
Record Retention and Access
Effective Date: August 10, 2022

Purpose:

This policy provides overarching guidelines related to record retention and access to records for the Northern Middle TN Workforce Board (NMTWB).

Background:

Uniform Guidance at 2 CFR 200.302 states that the financial management system of each non-Federal entity must provide for the following:

- Retention requirements for records – 2 CFR 200.334
Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award.
- Requests for transfer of records – 2 CFR 200.335
- Methods for collection, transmission and storage of information – 2 CFR 200.336
Records will be sufficient to provide periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.
- Access to records – 2 CFR 200.337
The Federal awarding agency, Inspectors General, the Comptroller General of the United States, the pass-through entity, or any of their authorized representatives will have the right of access to any documents, papers, or other records pertinent to the federal award, in order to make audits, examinations, excerpts, and transcripts. This right also includes timely and reasonable access to personnel for the purpose of interview and discussion related to such documents. Only under extraordinary and rare circumstances would such access include review of the true name of victims of a crime. Rights of access are not limited to the required retention period but last as long as the records are retained.
- Restrictions on public access to records – 2 CFR 200.338
Restrictions to public access to the records of NMTWB pertinent to a Federal award will not be limited, except for protected personally identifiable information or other confidentiality exceptions or exemptions.

Resources:

2 CFR 200.302; 2 CFR 200.334-338

Policy:

Northern Middle TN Workforce Board will abide by record retention and access requirements of Uniform Guidance and will also abide by any additional requirements, terms or conditions of the Tennessee Department of Labor and Workforce Development

(TDLWD). Where requirements differ, records will be retained under the requirements which are most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

Sub-Recipient record retention and access

It is the intent of Northern Middle TN Workforce Board that sub-recipients

- a. Meet record retention and access requirements stated at 2 CFR 200.334-338 and any additional requirements, terms and conditions of the Tennessee Department of Labor and Workforce Development (TDLWD),
- b. Are aware of the record retention requirements, and
- c. Attest to compliance with these requirements.

Where federal and state requirements differ, records will be retained under the guidance which is most stringent. See also, TDLWD and NMTWB's Electronic Case Files policies.

Contact:

For any questions related to this policy please contact Ginger Fussell, Fiscal Director at gfussell@workforceessentials.com.

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Updated: July 1, 2019; June 1, 2020, August 10, 2022

Duration: Indefinite



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