

Date: May 5, 2015

To: All WIA/WIOA Delegate Agencies

From: Chicago Cook Workforce Partnership

Subject: WIA Case File Maintenance, Security and Disposal Procedures

## **Procedures for WIA Case File Maintenance, Security and Disposal**

### **Maintenance and Security**

All WIOA/WIA customer case files shall be maintained in a locked, temperature controlled, safe and secure location. Great care must be taken to ensure that customer's private information is protected. Files should be stored in a location that makes them readily accessible if requested for audit purposes.

### **Disposal of file procedures**

#### **1) Determine if a file qualifies for disposal**

To qualify for disposal, the case files must meet all of the following requirements:

- The customer must have been exited from WIA/WIOA in IWDS,
- the customer case file is not part of any ongoing investigation, audit, litigation, negotiation and/or claim, and
- the customer has been exited for period of time long enough to qualify for disposal (see the chart below).

The chart below identifies the length of time that an exited case file must be securely retained before an agency can request approval from The Partnership to dispose of that case file. For the purpose of using this chart, the calendar year in which an exit occurs will be used and not the program year. For example if a customer was exited on 1/16/2013, then the calendar year of exit would be 2013. The same would hold true if the customer exited on 11/26/2013, the calendar year of exit would be 2013. Based on the chart, a case file exited in 2013 may be disposed of on 8/15/2018.

#### **2) Request approval to dispose of file(s)**

In addition to waiting the required retention period, an agency must receive the approval of The Partnership before the disposal of the file may occur. To request approval, the agency must complete the attached "**Request for Approval to Dispose of Case File**" form. Per the form, the agency must supply the customer's full name, last four of SS#, date of exit, agency name, and, if applicable, name of original agency if possession of file was transferred at some time.

<b>WIA Case File Destruction Cart</b>	
<b>Calendar Year of Exit</b>	<b>Disposal Date This is the date after which the case can be considered for Disposal</b>
2008	8/15/2013
2009	8/15/2014
2010	8/15/2015
2011	8/15/2016
2012	8/15/2017
2013	8/15/2018
2014	8/15/2019
2015	8/15/2020
2016	8/15/2021
2017	8/15/2022
2018	8/15/2023
2019	8/15/2024
2020	8/15/2025

### **3) Proper disposal methods**

Upon receiving approval from the Partnership to dispose of a file, the agency must dispose of it in a manner that ensures the protection of all private information contained in the case file. The Partnership requires shredding to ensure that the case file is thoroughly destroyed beyond recognition.

### **4) Maintain disposal records**

The agency should maintain a list of all case files that have been disposed of. The list should include the date when the files were disposed of and the method used. The agency must keep the Partnership's "disposal approval" with these records accessible for audit purposes (can be in electronic (PDF) format).