

## SAN JOAQUIN COUNTY WORKNET EMPLOYMENT AND ECONOMIC DEVELOPMENT DEPARTMENT POLICIES AND PROCEDURES DIRECTIVE

DIRECTIVE NO.	EFFECTIVE DATE	APPLICABILITY	PAGE
25-07	July 1, 2025	Departmental	1 of 5
SUBJECT: <b>RECORD RETENTION</b>			

### I. PURPOSE

This directive establishes the policy and procedures governing record retention for programs administered by the San Joaquin County Employment and Economic Development Department (EEDD), ensuring compliance with applicable Federal, State, and San Joaquin County regulations. The policy ensures that records are retained for their legal, operational, fiscal, or historical value and authorizes the timely destruction of records that have met their retention requirements.

### II. GENERAL INFORMATION

Proper record retention ensures transparency, protects personal and organizational rights, supports oversight functions, and reduces storage burdens. A record includes any form of recorded information related to public business created or maintained by EEDD staff or subrecipients, regardless of format (e.g., paper, electronic, audio/video, social media, etc.). This includes case files, reports, correspondence, financial documents, personnel files, and communications. Drafts or working copies not needed for ongoing business are not considered official records.

Because EEDD administers a variety of programs and the variety of Federal, State, and County policy, the procedures for record retention will vary by program.

#### References

- [Workforce Innovation and Opportunity Act \(WIOA\), Public Law 113-128 Section 116\(i\), Fiscal and Management Accountability Systems and Section 184, Uniform Administrative Requirements](#)
- [2 CFR Part 200, Uniform Administrative Requirements](#)

- [2 CFR Part 2900, Department of Labor \(DOL\) Exceptions](#)
- [13 CFR Part 307, Economic Adjustment Assistance Investments](#)
- [22 CCR 4442, Record Keeping](#)
- [WSD16-05, WIOA Closeout Requirements](#)
- [San Joaquin County Administrative Manual, Section 2729, Records Retention](#)

### III. POLICY

Unless otherwise specified by Federal or State requirements:

#### General Retention Period

All financial, administrative, and programmatic records related to a Federal award shall be retained for five (5) years from the date of submission of the final expenditure report for that program, or longer if specified by grant terms or if an audit, litigation, or claim is ongoing.

Exceptions to the 5-Year Rule Include:

- Litigation or Audit: Records must be retained until all findings, claims, or litigation are resolved and final action is taken.
- Extended Retention Notification: If instructed in writing by federal or state agencies, retention may be extended.
- Real Property and Equipment: Retain for five years after final disposition.
- Program Income: If program income is earned post-period of performance, retain for five years from the fiscal year in which it was earned.
- Indirect Cost Proposals/Cost Allocation Plans:
  - If submitted for negotiation: 5 years from the date of submission
  - If not submitted: 5 years from the end of the applicable fiscal year

If any program's retention requirement is greater than five years, that longer period shall apply. Where records are governed by a lesser retention period under another agreement, EEDD's five-year standard will prevail unless otherwise required by law or contract.

### IV. PROCEDURE

#### WIOA Adult, Dislocated Worker, Youth

Participant case files and supporting documents must be retained for five years from the date of final closeout of the subrecipient's contract. All participant information and documentation should be maintained in CalJOBS to ensure secure and consistent recordkeeping. In cases where there are unresolved audits,

litigation, or grievances, records must be retained until all issues are fully resolved, regardless of the original retention period.

If a subrecipient ceases operations, they are required to notify EEDD and deliver all records to a secure location designated by the EEDD. The destruction of any records must comply with EEDD policies for protecting personally identifiable information (PII) and may only occur with authorization from the division manager.

### Non-WIOA Grants

For non-WIOA federally funded grants, the standard record retention period follows the WIOA guideline of five years, unless otherwise specified in the grant agreement. All record destruction procedures must comply with internal policies governing the secure handling of personally identifiable information (PII) to ensure confidentiality and data protection.

### CalWORKs Job Search/Job Readiness

CalWORKs Job Search/Job Readiness participant records must be retained for five years from the closeout date of the subrecipient's contract. In cases involving litigation, records are to be retained for five years from the date of the final federal reimbursement claim.

### AB109

AB109 records must be retained for five years from the date of final cost report submission or until all related audits and exceptions are fully resolved. These records must be made available upon request to authorized representatives of the County, State, and Federal oversight authorities.

### Revolving Loan Fund

Revolving Loan Fund (RLF) closed loan files, and all related documentation must be retained for five years from the date of final loan disposition. The grantee is required to maintain adequate accounting records and loan system documentation throughout the duration of RLF operations. All such records must be made available to the Economic Development Administration (EDA) or federal auditors upon request.

### Employment Training Panel

Employment Training Panel (ETP) records, including all training, payroll, and financial documentation, must be maintained for five years following the final payment or the termination of the agreement, whichever occurs later. In cases involving litigation or audits, records are to be retained for five years from the final

resolution of such matters. All training records must comprehensively document trainer and trainee names, training dates, signatures, hours attended, course types, and, where applicable, evidence of competency attainment. These records must be kept accessible for review and are subject to audit by ETP representatives at any time.

### Destruction of Records

Upon expiration of the retention period and clearance of any audit or legal hold, records shall be securely destroyed in accordance with EEDD's PII procedures and the following disposal requirements:

1. **Authorization:** Before any disposal occurs, the division manager or designated authority must formally authorize the destruction of records. Staff should confirm that all applicable retention periods have expired and that no outstanding audits, litigation, claims, or grievances are associated with the records.
2. **Verification:** Conduct a thorough review to ensure records are eligible for disposal. This includes verifying that no records are subject to extended retention due to open investigations, federal reimbursement claims, or exceptions listed in grant-specific guidance.
3. **Secure Disposal:** All records containing Personally Identifiable Information (PII), confidential participant data, or sensitive financial and programmatic information must be destroyed in a secure manner. This includes:
  - **Paper records:** Shred using a crosscut shredder or dispose through a certified document destruction service that provides a certificate of destruction.
  - **Electronic records:** Use secure data-wiping software to permanently delete files. For physical media (e.g., hard drives or flash drives), degaussing, physical destruction, or certified e-waste services must be used.
4. **Documentation:** Maintain a destruction log that records:
  - Description of the records destroyed
  - Date of destruction
  - Method used
  - Staff involved
  - Authorizing official's name and signature

5. **Compliance with Internal Policies:** All disposal procedures must comply with EEDD's internal data protection and PII handling policies, as well as any additional guidance from oversight agencies such as EDD, DOR, or ETP.

Access to Records

All retained records shall be stored in a manner that allows timely retrieval and must be made available to authorized representatives of the State, federal agencies, and EEDD monitors upon request.

V. QUESTIONS REGARDING THIS DIRECTIVE

May be referred to the Executive Director of EEDD via Managers or designee.

VI. UPDATE RESPONSIBILITY

The Executive Director of EEDD and/or designee shall be responsible for updating this directive, as appropriate.

VII. APPROVED



PATRICIA VIRGEN  
EXECUTIVE DIRECTOR

PV:jl

Attachment 1: San Joaquin County Records Retention Schedule

**SUB-SECTION:****PAGE 1 of 4**

2729 Records Retention

<b>Item No.</b>	<b>Records Series/ Description</b>	<b>Dept Holding Official/ Original Record</b>	<b>Retention Official Holder</b>
	<b>AUDITING/FISCAL</b>		
1.	<u><b>Audits</b></u>  Reports, Correspondence, working files on internal audits.	Clerk of the Board has the original Report.  Auditor-Controller has report and backup information.	Retains Permanently.  Retains for 2 years.
2.	<u><b>Billings</b></u>  Interdepartmental billings include Service & Stores Fund Transfers; any inter-fund transfers; also backup and support information i.e. motor pool monthly mileage reports.  Outside billings-revenue generating accounts.	Auditor-Controller.	Retains for 5 years and until audited per Govt. Code 26907.
3.	<u><b>Budget and Revenue Detail</b></u>  Monthly report showing Y.T.D. totals of encumbrances, expenditures and revenues, and unencumbered appropriations and estimated revenue balances respectively. Also shows details of current month's transactions.	Auditor-Controller.	Retains for 5 years or until audited.
4.	<u><b>Budget Reports</b></u>  Final budget for the fiscal year is adopted by the Board of Supervisors.	Clerk of the Board.	Retains permanently.
5.	<u><b>Cash Receipts (Departmental)</b></u>  Records of cash received. Includes journals, receipt books, printouts. Actual receipts retained by departments are the duplicate originals, since the original receipt is given to customer paying fee.	Any department receiving cash.  Auditor-Controller.	Retains records showing cash received and monthly totals until expiration of term of officer. Govt. Code 24352 requires each officer who receives cash to keep that record available for public inspection. That record to be delivered to the Auditor on expiration to the term of the officer. Other cash receipt records to be retained until audited.  Retains for 5 years after receipt from departments per Govt. Code 26907.

Item No.	Records Series/ Description	Dept Holding Official/ Original Record	Retention Official Holder
6.	<b><u>Claims/Invoices/Billings Paid</u></b>  Includes invoices covered by purchase orders, billings not covered by regular purchase orders, claims for payment submitted with paid claims form, and expense reimbursement claims. Also any supporting documentation.	Auditor-Controller.	Retains 5 years and until audited per Govt. Code 26907.
7.	<b><u>Encumbrance Request</u></b>  Request to Auditor-Controller to carry portion of current year's appropriation to next fiscal year. Includes supporting data.	Auditor-Controller.	Retains 5 years or until audited per Govt. Code 26907.
8.	<b><u>Inventory Records</u></b>  Inventory of all departmental fixed assets and property; oath accompanies Inventory of County Property form.	Auditor-Controller.	Retains 5 years and until audited per Govt. Code 24051.
9.	<b><u>Petty Cash Records (Departmental)</u></b>  Includes pre-numbered vouchers, supporting data and daily reconciliations.	Any department with petty cash records.	Retains 5 years or until audited.
10.	<b><u>Treasury Deposits</u></b>  Receipt to show amount of money received by a department to be deposited and account to be credited.	Departments with copies of Treasury Deposits.  Auditor-Controller has duplicated Originals.	Retains for 5 years. Govt. Code 36907.2 requires that <u>copies</u> of deposit receipts be retained for 5 years.  Retains for 10 years.
<b>ADMINISTRATION</b>			
11.	<b><u>Conflict of Interest</u></b>  Statements of Economic Interest (financial disclosure statements) as completed by individuals required to file.	Registrar of Voters is the filing officer for the County of San Joaquin and certain elected officers.  (Fair Political Practices Commission is the filing officer for certain elected officers.)  Districts act as their own filing officers.	Retains indefinitely.

Item No.	Records Series/ Description	Dept Holding Official/ Original Record	Retention Official Holder
12.	<p><b><u>Correspondence</u></b></p> <p>General, routine correspondence issued and/or received by department. Filed in alphabetical order by subject matter then by year.</p>	Departments.	At the discretion of the department head. However, any information on taxation and assessments should be retained for 7 years per Revenue and Taxation Code 465.
13.	<p><b><u>Travel Requests</u></b></p> <p>Requests for travel with supporting data.</p> <p>- Departmental.</p> <p>- Board-approved.</p>	<p>Auditor-Controller.</p> <p>Departments.</p> <p>Clerk of the Board.</p>	<p>Retains any travel requests with expense reimbursements for 5 years and until audited.</p> <p>Retains for 2 years.</p> <p>Retains permanently.</p>
<b>BOARD OF SUPERVISORS</b>			
14.	<p><b><u>Board Agenda Packets</u></b></p> <p>Agenda item information as submitted by a department for consideration by the Board. Letter with attachment, Board Order, Resolution, staff report and other supporting documents, grant applications, contracts/agreements.</p>	Clerk of the Board.	Retains permanently, may be microfilmed or stored digitally.
15.	<p><b><u>Board of Supervisors Agenda</u></b></p> <p>Informational copy of weekly Board of Supervisors' meeting agenda.</p>	Clerk of the Board.	Retains permanently.
16.	<p><b><u>Board of Supervisors Minutes</u></b></p> <p>Informational copy of board of Supervisors' meeting minutes.</p>	Clerk of the Board.	Retains permanently.
17.	<p><b><u>Contracts and Agreements</u></b></p> <p>Rental, leases, maintenance, service, consulting agreements with supporting data.</p>	<p>Clerk of the Board holds Board-approved contracts and agreements.</p> <p>Purchasing holds all other contracts and agreements not approved by the Board.</p>	Retains permanently.



<b>Item No.</b>	<b>Records Series/ Description</b>	<b>Dept Holding Official/ Original Record</b>	<b>Retention Official Holder</b>
	<b>PERSONNEL/PAYROLL</b>		
18.	<b><u>Accident Reports</u></b>  Forms, correspondence and reports relating to employees' claims regarding work-related accidents.	Human Resources.	Retains for 5 years from date of incident.
19.	<b><u>Attendance Records</u></b>  Includes overtime earned/time off request forms and time cards submitted by employees.	Departments.	Retains for 5 years or until audited.
20.	<b><u>Organizational Charts</u></b>  Shows organization of County departments.	Human Resources .	Retains permanently.
21.	<b><u>Payroll Certification Reports</u></b>  Certified report of weekly record of employees' attendance submitted to Auditor-Controller every pay period.	Human Resources.	Retains permanently, may be microfilmed.
22.	<b><u>Personnel Files</u></b>  Includes personnel action documents (PAD), employee reviews, and other pertinent information concerning an employee.	Human Resources.	Retains for 5 years after employee's termination.
23.	<b><u>Personnel Requisitions</u></b>  Forms and correspondence regarding filling of departmental positions.	Human Resources.	Retains for 5 years (EEO specifies 2 years or if charge brought, until final disposition of the matter.)
24.	<b><u>Salary Tables</u></b>  Rates of pay for all job classifications.	Human Resources.	Retains permanently.
	<b>PURCHASING/SUPPLIES</b>		
25.	<b><u>Purchase Orders</u></b>  Includes rapid purchase orders, check p.o.s., term agreements. Forms and correspondence relating to acquisition of supplies, equipment, agreements, services, etc. with vendors.	Purchasing has duplicate original.	Retains for 5 years until audited.
26.	<b><u>Purchase Requisitions</u></b>	Purchasing.	Retains for 5 years and until audited. Govt. Code 25501.5 requires Purchasing Agent to retain for 3 years.