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	<i>Revised Date:</i>	<i>Section # & Title:</i> 400- Strengthening Working Families Initiative Grant	
Phoenix Business and Workforce Development	<i>Date Approved:</i> 05.09.19	<i>Subject # & Title:</i> 410 Records Retention Policy	

I. STATEMENT OF POLICY

This Records Retention Policy covers all the City of Phoenix’s records and documents of all fiscal and program activities conducted under the U.S. Department of Labor H-1B funded Strengthening Working Families Initiative (SWFI) grant. This policy contains the minimum requirements and timeframes for the management and retention of certain documents and how records should be destroyed. The policy is designed to ensure compliance with federal, state, and city laws and regulations, to eliminate accidental destruction of records and to facilitate the operation of the SWFI program by promoting efficiency, preserving valuable storage space and decreasing costs.

II. ADMINISTRATION

The designated Records Officer shall administer this Policy and ensure the Records Retention Schedule follows federal, state and city laws and includes the appropriate document and record categories for City of Phoenix Human Services Department Business and Workforce Development Division (HSD BWD). The Records Officer is also authorized to monitor internal compliance with the policy and annually review the record retention and destruction program.

III. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

No director, officer, employee, volunteer or agent of the City shall destroy, dispose of, conceal, or alter any record or document while knowing that it is or may be relevant to an anticipated or ongoing investigation or legal proceeding conducted by or before a federal, state or local governmental agency, anticipated or ongoing internal investigation, audit or review conducted by the City. “Agency” includes regulatory agencies, law enforcement agencies, and criminal and civil courts.

References: 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements, subpart E and Appendices I through XI, including any exceptions identified by the Department at 2 CFR part 2900.

IV. RECORD STORAGE AND ACCESSIBILITY

The U.S. Department of Labor and/or the City and any of their authorized representatives have the right of timely and reasonable access to any books, records, papers or other records that are pertinent to the grant. (20 CFR §627.460(e)) Records shall also be made available to the public subject to City of Phoenix Administrative Regulation 1.60 Revised and Arizona Revised Statute §39-121-161 (20 C.F.R. §627.463). Records must be transmitted within the period stated by HSD BWD and must be properly labeled and filed in accordance with City of Phoenix Administrative Regulation 1.61.

Records shall be maintained and stored in a manner which preserves the integrity and admissibility as evidence in any audit or proceeding (20 CFR §627.460(d)).


V. SUBRECIPIENTS

HSD BWD requires all subrecipients to include record retention requirements in its contractual agreement and will ensure compliance through monitoring. In the event of termination of the relationship with a subrecipient, HSD BWD is responsible for the maintenance and retention of participant records. Any property returned to HSD BWD must be accompanied by all original records, or certified copies thereof, pertaining to the property. HSD BWD prohibits subrecipients from disposing of any records without the prior written consent of HSD BWD (20 CFR §627.460).

VI. RETENTION SCHEDULE

A. Financial Records

HSD BWD will retain all financial records pertinent to grants and agreements, including supporting documentation for a period of three years following the date on which the final expenditure report is submitted to the U.S. Department of Labor (29 CFR §97.42). These documents include but are not limited to:

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- Check register and checks
- Bank deposits and statements
- Chart of accounts
- General ledgers and journals (includes bank reconciliations)
- Expense analysis/expense distribution schedules
- Invoices
- Accounts Receivables
- Petty cash vouchers
- Purchase orders
- Requisitions
- Vouchers for payments to vendors, employees, etc.
- Labor market analyses and reports

B. Property Records

HSD BWD will retain all nonexpendable property records for a period of three years from the date of final disposition of property. Property records consist of purchase documents, inventory records, and disposition documents (29 CFR §95.53).

C. Participant Records

BWD, and subrecipients as applicable, will retain all participant records and supporting documentation pertinent to the SWFI grant for a period of three years following the date on which the final expenditure report is submitted to the Department of Labor (29 CFR §97.42) or when the participant exits the program, whichever occurs last.

D. All Other Documentation

All other documentation not specially noted above will be retained in accordance with the city's record retention schedule be maintained for a period of six years after expired, canceled or revoked.

VII. POLICY MANAGEMENT REQUIREMENTS

This policy will be reviewed on an annual basis. Recommendations for revision will be submitted to Phoenix Business and Workforce Development Board's Executive Director.

VIII. ATTACHMENTS

- SWFI Records Retention Management Procedure