



**NORTH CAROLINA DEPARTMENT OF COMMERCE
DIVISION OF WORKFORCE SOLUTIONS**

DWS POLICY STATEMENT NUMBER: PS 09-2013

Date: July 12, 2013

Subject: Electronic File Storage and Retrieval of Workforce
Investment Act (WIA) and Other Federal Funds Records

From:

Roger Shackleford

Roger Shackleford, Assistant Secretary

Purpose: To provide guidance on the use of electronic image storage and retrieval of Workforce Investment Act (WIA) and other Federal funds' participant, program and financial documents; and to remind Local Area Issuance No. 2011-07.

Background: Local Workforce Development Areas and the North Carolina Division of Workforce Solutions (DWS) must maintain many forms of documentation and data for Federal funds purposes. These documents and data may be stored electronically and must have the potential to be retrieved as per guidance in this Policy Statement.

Action: Local Workforce Development Areas and DWS offices using electronic file storage and retrieval systems must meet the minimum requirements as outlined in Attachment I of this Policy Statement. The electronic storage of all financial documents must allow for a complete audit trail.

Effective Date: Immediately

Expiration: Indefinite

Contact: Field Services Program Staff

Attachment: North Carolina Guidance for Workforce Investment Act and Other Federal Funds Electronic Image Storage

**NORTH CAROLINA
GUIDANCE FOR WORKFORCE INVESTMENT ACT (WIA)
AND OTHER FEDERAL FUNDS ELECTRONIC IMAGE STORAGE**

At a minimum, Local Workforce Development Areas' Electronic Storage and Retrieval Systems must:

- Ensure the integrity, accuracy, authenticity, and reliability of the records kept in electronic format;
- Be capable of retaining, preserving, retrieving, and reproducing the electronic records;
- Be able to update/convert the records as new technology develops;
- Organize documents in a manner consistent with applicable Division of Workforce Solutions policies;
- Ensure that financial and program records maintain a completeness of documentation, are organized by Program Year, and are sufficient for a complete audit trail;
- Have adequate disaster recovery plans, including proper anti-virus protection, tamper proof secondary/supplementary data storage facilities such as regular backup in an external hard drive, and stored in a safe location;
- Ability to convert paper originals stored in electronic format back into legible and readable paper copies; and
- Have adequate records management practices in place.

Before implementing the use of an Electronic Storage and Retrieval System, Local Workforce Development Areas must have:

1. Electronic Data Storage and Retrieval Policies, Procedures and/or Guidelines as submitted to and reviewed by the North Carolina Division of Workforce Solutions (DWS).
2. Adequate computer hardware necessary for implementation, including scanner and/or signature pads.
3. Established file structure, which includes Data Validation codes, as required and approved for participant records by DWS.
4. Appropriate electronic document storage and retrieval software to include capacity to scan and retrieve documents in universally accepted file format such as PDF.
5. Adequate organization server storage capacity which complies with record retention and access regulations as outlined by the Workforce Investment Act of 1998, Public Law 105-220, Section 185.
6. Adequate security measures, for example, password protected assigned access.
7. Documented compliance with vendor recommendations regarding security and login identification and conformity with all software vendor licensing guidelines.
8. Appropriate licensure for software including adequate user licenses as recommended by vendor.
9. Appropriate archiving procedures for storing outdated and/or no longer useful documents.
10. Access capability for DWS and Federal officials for Data Validation, monitoring, and auditing as needed.