



CENTRAL REGION

**Central Virginia Workforce Development Board**

**Workforce Innovation and Opportunity Act (WIOA) Administrative Policy #208**

**Subject: Custody of Records**

**Date of Issuance: March 19, 2019**

**Purpose:**

This policy is intended to provide guidance pertaining to the custody, confidentiality and integrity of participant records.

**Requirements:**

Program Contractors will abide by the following guidelines when transferring participant records to the custody of Central Virginia Workforce Development Board (CVWDB):

- The contractor will provide CVWDB with a list of active participants to include: first and last name, state ID number, program, and location of file.
- The contractor will provide CVWDB with a list of inactive participants (follow-up or exited) to include: first and last name, state ID number, program, and location of the file.
- The contractor will provide CVWDB with a current VaWC Client Listing Report which indicates all the participants who are active in the program at the time of the transfer.
- The contractor will provide CVWDB with a completed Chain of Custody form (attachment A).

Chain of Custody Form

- The Client Listing Report should be compared with the actual files being transferred. Any missing or unaccounted for files should be indicated on the Chain of Custody form.
- The Chain of Custody form should include the date of transfer, the recipient and number of files being transferred. (An explanation of missing files should be included.)
- The Chain of Custody form should be signed by the contractor, recipient and CVWDB. A copy will be given to the recipient (new contractor) and the original will be retained by CVWDB.

## Record Security

- All forms must be stored in locked file cabinets when not in use.
- Any information that describes an individual's medical condition or disability must be maintained in a separate locked file consistent with policies and procedures.
- All guidelines set forth in policy AP 202 Confidentiality and Document Retention must be adhered to.