

## File Management Policy #P-36-1.24


Date: January 10, 2024

Re: File Management

Policy Approved: February 8, 2024

References: 29 CFR §38.41(b)(3)  
29 CFR §95.53  
29 CFR §37.39  
SCPa Works PII Policy #P-3-2.22

Attachments: Case Record Format (*Attachment I*)

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### I. Overview

- A. SCPa Works requires all Title I grant subrecipients to maintain electronic and hard copy files for all participants who receive services and have yet to be called for archiving.
- B. Each participant hard copy file will include the following:
  - 1. Eligibility Verification Documentation
  - 2. Contact Information
  - 3. Release of Information
  - 4. Credentials/Certifications
  - 5. Supporting Documentation for all Expenditures
- C. WIOA Youth Participant Files will include the following additional items:
  - 1. Application  School Records
  - 2. Work Experience Documentation
  - 3. Assessments (objective and basic skills)
  - 4. Portfolio & Activities Materials
  - 5. Exit/Performance Measures

### II. File Management Compliance

- A. The maintenance of electronic and hard copy files must adhere to all file management practices included in the SCPa Works Personally Identifiable Information (PII) Policy #P-3-2.22.
- B. Case notes will be printed and added to each hard copy file.
- C. Hard copy files must be prepared for all WIOA Adult, Dislocated Worker, and Youth participants following eligibility determination and enrollment before receiving and documenting the first basic or individualized career service.

### III. Medical and Disability Information; SCPa Works PII Policy #P-3-2.22 Section VI

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*Equal Opportunity Employment/Program ~ Auxiliary aids and services are available upon request to individuals with disabilities.*

- A. Participant files and electronic records must not contain any medical information.
- B. Whether written or oral and regardless of format, staff must maintain the confidentiality of the following:
  - 1. Personal and confidential information that contains health information related to a physical or mental disability, medical diagnosis, or perception of a disability related to the individual **must be kept in a separate locked file** and apart from working files.
  - 2. Personal and confidential information that contains health information related to a physical or mental disability, medical diagnosis, or perception of a disability related to the individual contained in case notes **must be redacted** from the participant file; the original notes must be placed in the participant's medical file.
- C. Access to the medical files:
  - 1. Must be limited and should only be accessed **with the approval of program management** and when such access is necessary to facilitate a participant's access to services or to support an ongoing service plan or
  - 2. First aid and safety personnel may be provided access to a participant file if medical information is needed in the event of an emergency; or
  - 3. Local, state, or federal monitors in compliance with 29 CFR Part 32.44(c) and 29 CFR Part 38.60 may have access to medical files for monitoring purposes.
  - 4. When a request for medical records is initiated, a WIOA/TANF participant must sign and date the SCPa Works Consent to Release Information form.
    - a. This signed form will be maintained in the participant's physical case record file.
- D. When all services, including follow-up services, are complete and the participant file is ready to be archived, participant medical and disability-related information previously filed separately from the active file must be placed in a sealed envelope and marked "Medical and Disability Information."
  - 1. The sealed "Medical and Disability Information" will be secured in the participant file.

**IV. File Maintenance**

- A. Subrecipients will update files with appropriate and relevant documentation per SCPa Works policies to ensure that hard copy files are aligned with electronic records and that all aspects of file maintenance are up-to-date.

**Summary of Changes:** This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date