


## Digitization and Electronic Record-Keeping Policy #P-6-7.22

Re: Digitization, electronic record-keeping in CWDS, and the secure handling, transmission, and destruction of digital records.

Updated February 27, 2026  
Revision Approved: N/A

Originated: September 25, 2022  
Approved: November 11, 2022

References: WSP 01-2015  
CWDS FR 11.3 WIOA Title I Verification Details

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### I. **Policy:**

- A. All staff must upload digitized verification source documents to CWDS to complete WIOA Title I application eligibility verification details.
- B. All files digitized for upload must also be retained in hardcopy in accordance with the current recordkeeping requirements and procedures.
- C. The steps to upload verification source documents can be found in the CWDS FR 11.3 instructional guide, as referenced above.
- D. CWDS provides secure storage, and the Commonwealth and contractor staff who access uploaded documents are bound by an agreement to protect participants' privacy.
- E. SCPa Works' PII Policy is vitally important and must be strictly followed regarding the digitization of records.
- F. Digital records should be scanned directly to a designated folder on a secure internal network, uploaded to CWDS, validated for successful submission to CWDS, and immediately deleted from the designated folder.
  1. The designated folder should serve only as a temporary holding location on a secure hard drive to temporarily store documentation containing PII.
    - a. The designated folder should be emptied at the end of every business day to ensure that all participant data is secure.
  2. Scans may not be saved or stored electronically for more than the time it takes to upload the documentation to CWDS.
    - a. Action to permanently delete scans must occur immediately after verification of successful upload to CWDS.
      - i. SCPa Works Compliance Team conducts reviews of the designated folder during scheduled monitoring visits to ensure the destruction of PII documents.

SCP a Works File Management Policy #P-36-1.24 ~ SCWDB Approved August 1, 2024





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- b. All contracted service providers must develop their own internal protocols per this policy and the PII Policy.

**II. 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
07/25/2022	Saranne Miller 	Added content under Section I(H) and (F) to further detail the secure handling of electronic record keeping.	11/11/2022
07/18/2023	Saranne Miller 	Reviewed for updates. Completed grammatical edits.	07/18/2023
01/14/2024	Saranne Miller 	Reviewed for edits. No revision necessary. Re-formatted header page.	01/14/2024
02.27.2026	Saranne Miller 	Reviewed for updates. Added new footer. Approval not necessary.	02.27.2026

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