

Section 1.14: Record Retention

5/2019

References: CFR 7 246.25 (a) (2); Agreement for the Administration of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC Program); MDH Master Grant Contracts; and [Section 1.7 Data Privacy](#), Minnesota Statute 16B.98.

Policy: Records concerning WIC Program operations are retained according to State and Federal regulations.

Purpose: To ensure that WIC records are retained according to regulations and available for review during management evaluations.

Procedures

- Retain all WIC records concerning Program operations for a minimum of six (6) years from the end of the grant agreement end date.
- Retain participant data for 6 years from the date of the last participant activity, then destroy.
- When duplicate records exist, only one form, either paper or electronic, must be retained.

Records (either paper or electronic) to be retained

Program Operations:

- Monthly Claim for Reimbursement and documentation of amounts claimed
- Civil rights and fair hearing records, if applicable (reviewed at Management Evaluation)
- Inventory Logs:
 - Equipment Purchase and Inventory Logs
 - Exhibit 7-I: [Returned Formula Log](#)
 - Benefit Stock Packing Slips (pre- eWIC)
- Benefit Issuance (eWIC cards) Inventory

Participant Data:

- Participant certification records not documented in the WIC Information System

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- Other participant records or documents pertinent to the record such as Medical Formula Documentation Form ([Minnesota WIC Program Request for Medical Formula](#)) and [Minnesota WIC Program Request for Medical Follow-up](#) (MOM Exhibit 5-Y)
- Documentation of participant violation, including duplicate participation, lost or stolen food benefits, other types of participant violations
- Agencies that administer Peer Breastfeeding Support Programs: records with participant confidential information such as peer referral forms and client contact logs, including closed records.

Record Storage

- Records should be available **during business hours** for authorized representatives of the Minnesota Department of Health, the state Legislative Auditor, the USDA and/or General Accounting Office of the United States for purposes of inspection, auditing and copying.
 - When storing records, use practices to ensure data privacy ([Section 1.7: Data Privacy](#)).

Record Destruction

- Due to the confidentiality of some records, care must be taken to ensure that those records are shredded or destroyed, or purged from electronic files in a way that protects confidentiality.
- Document the name of the record and date of destruction according to your agency policies.

Guidance

- Records should be stored so that they can be easily retrieved. At least three years of records should be on site, if space permits, or stored electronically.
- Records may be kept longer if required by local agency policy.
- Other records not noted in this policy (Management Evaluations, Financial Reviews, CPA Performance Evaluations, etc.) should be stored and retained as long as they are useful.
- Although an inventory of only “Capital Equipment” is required to be kept, it may be advantageous to keep a simple inventory of WIC equipment for tracking equipment purchased with WIC funds and owned by the Program. This inventory may be kept as part of the large agency inventory, as long as WIC equipment is designated.

Records to be retained for biennial Management Evaluation review:

- [Civil Rights Training Log](#)
- [Security Training Module Tracking](#)

- [Documenting Clinic Scale Testing](#)
- [Returned Formula Log](#)
- [Breastpump Issuance and Inventory Log](#) (if applicable)
- [WIC Capital Equipment Inventory Log](#) (items valued at \$5,000 or more)
- Outreach Log
 - see [Section 1.6: Public Notification and Outreach](#) for example
- [Local Agency Chart Review Form](#)
- New Staff Training Log
 - see [New Staff Training](#) for more information
- Separation of Duties (SOD) Review
 - See [Local Agency Internal Chart Review for One-Staff Certifications](#) for an example, per Local Agency SOD plan ([Section 1.18: Separation of Duties to Assure Program Integrity](#))
- Voucher Stock Packing Slips (pre-eWIC)
- Benefit Issuance (eWIC cards) Inventory

Reference – Complete Listing of Hyperlinks

[Section 1.7 Data Privacy](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_7.pdf)

[Returned Formula Log](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex7/7i_fill.docx)

[Minnesota WIC Program Request for Medical Formula](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex7/7d.pdf>)

[Medical Formula Documentation Form](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex7/7d.pdf>)

[Minnesota WIC Program Request for Medical Follow-up](#)

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5y.pdf>)

[Section 1.7: Data Privacy](#)

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_7.pdf)

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Civil Rights Training Log

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/civilrights/docform.docx>)

Security Training Log

(<https://www.health.state.mn.us/docs/people/wic/localagency/infosystem/training/security/track.docx>)

Scale Testing Log

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5k.pdf>)

Breastpump Issuance and Inventory Log

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex6/6g1.pdf>)

WIC Capital Equipment Inventory Log

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex2/2f.pdf>)

Section 1.6: Public Notification and Outreach

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_6.pdf)

Local Agency Chart Review Form

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex4/4j.pdf>)

New Staff Training

(<https://www.health.state.mn.us/people/wic/localagency/training/nst.html#NaN>)

Local Agency Internal Chart Review for One-Staff Certifications

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex/1q.docx>)

Section 1.18: Separation of Duties to Assure Program Integrity

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_18.pdf)

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