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DATE: April 5, 2017
TO: WIC Coordinators
FROM: Nutrition & Clinic Services Unit
SUBJECT: WIC Release of Information Form – Updates

The MDH WIC Office has sent out information to Local Agencies on requirements for protecting private data and on the federal WIC regulations governing Release of Information. The federal requirements *have not changed*. However, we have identified some options that provide more flexibility and added convenience.

Disclosure of private WIC data for any purpose *other than* in the case of mandatory reporting by the WIC Local Agency of child abuse or neglect, or in response to a court order, **requires a signed release** from the participant or legal guardian/parent, in the case of a child.

The MN Operations Manual, [Section 1.7 Data Privacy](#), provides [Exhibit 1-C](#), a sample release form that meets WIC requirements.

Recently MDH WIC became aware that a Release of Information would meet state and federal requirements with the following options:

- **A medical clinic and specific health system** (e.g. Mayo Clinic-Austin or Allina-Woodbury) named in place of, or in addition to, a specific individual health care provider; and
- **An authorization period of up to five years.** Local Agencies using a single Release of Information valid for more than one year, *must evaluate* that the authorization remains in effect at recertification appointments. Also, whenever data is to be shared, staff must first determine whether the clinic/provider to whom the information is being released, is still appropriate. A new release *must* be completed if there are any changes.

These are options that may be used if they better meet participant and local agency needs.

Why a change?

- MDH WIC recognizes that health care systems and clinics are sharing data so that a patient's chart follows the individual. Participants might see a health care provider who is part of a team and might not see the same provider for all of their care. Additionally, they may be referred to other care providers within the system for specialized care.
- Extending the time period over which a Release of Information is valid can reduce the administrative burden for local agencies.

Notify your State WIC Consultant if you would like to update or change your agency's Release of Information or if you have questions about this change.