

# m e m o

**DATE:** May 1, 2020  
**TO:** WIC Coordinators  
**FROM:** State WIC Staff  
**SUBJECT:** Flexibility for Written Release of Information

Minnesota WIC has requested and obtained flexibilities for a written Release of Information. The purpose is to facilitate referrals to health care providers and other programs during the COVID-19 Response.

**With this flexibility, the options for obtaining a Release of Information (ROI) during the COVID-19 Response are the following:**

1. **Written ROI:** Local agencies are encouraged to obtain a written ROI if possible. A written ROI enhances the participant's understanding of what private data they are releasing and who will be receiving that data. Additionally, a written ROI generally covers a longer period than option 2 below, reducing redundancies. See the April 29, 2020 Wednesday Update [WIC Referrals during the COVID-19 Response](#) for ideas for obtaining a written Release of Information.
2. **Verbal ROI:** If obtaining a written ROI will delay a referral to the health care provider or another program, use a temporary verbal release. WIC staff must assure the participant understands the release purpose and process. To obtain a verbal ROI:
  - Discuss the benefits/need for referring the participant to the health care provider or identified program.
  - Inform the participant that their WIC data is private and a release is necessary to share their data with the health care provider or identified program. See [Data Privacy, MOM Section 1.7](#).
  - Ask the participant if you may share private data with a verbal release. If the participant agrees to the verbal release, inform the participant of:
    - What data will be shared
    - The purpose of releasing the data and how it will be used
    - To whom the data is being released
    - That declining to agree to the release will not impact their eligibility
  - **Document** the temporary verbal ROI in a General Note. Select note subject **ROI Verbal**. This new note subject will be available Monday May 4, 2020. Document the date and the name of the health care provider or program receiving the referral information.
    - The verbal release will be in effect until their next in-person visit. Create an alert that staff need to obtain a written, signed ROI at that time.

**Other considerations for a verbal ROI:**

- Refer to your agency's ROI for specific language.
- Follow your local agency procedures regarding whether the release is at the individual or household level. Document the verbal ROI in all applicable household member records.
- If your Release of Information is available on your website, encourage participants to review the ROI before their appointment. Alternatively, the agency might consider emailing a copy of the ROI to participants for their review.