

WIC WIC POLICY AND PROCEDURE MANUAL

Michigan Department of Community Health

Chapter/Section: 1.10

Effective Date: 12/6/91

Issue Date: 12/6/91

1. GENERAL ADMINISTRATION

1.10 Records Retention and Destruction

FINAL

A. POLICY

- 1. The local agency must retain all hard copy inactive participant records, dual participation reports and program records in the local agency for at least 3 years and 150 days after the completed fiscal year.***
 - a. Participant Records: Including but not limited to income determination, nutrition care plans, CDE/worksheet copies, dietary questionnaires/evaluation forms, fair hearing records, child abuse and neglect reports, health history forms, and notification of termination or ineligibility. If documentation of nutrition education and referrals is maintained in participant's chart, these are considered to be participant records also.**
 - b. Dual Participation Reports: Dual participation reports for WIC P16107 and Focus:HOPE/CSFP P16196.**
 - c. Program Records: Agency specific records, contracts, budgets and administrative hearing records.**
 - d. Coupon Registers and Coupon Register Copies: Automated coupon registers P16276 and coupon register copies (yellow). See Policy 8.22, Coupon Copy Retention.**
- 2. Prior to destruction of WIC records, the local agency must determine that all agency audits and litigation are completed for the period of these records.**
- 3. If an audit or litigation are pending for the period of the records, the records and reports must be retained until completion of the audit or litigation process.**
- 4. The following records and reports may be destroyed in accordance with Policy Statement #7, when their usefulness is completed:**
 - a. Numerical Listing P16102**
 - b. Participant Profile P16191 (Form H-289) if not used for nutrition education documentation**
 - c. Alphabetic Listing P16505**

***USDA requirement regarding record retention. This may not reflect other federal or state record retention laws or requirements.**

- c. Alphabetic Listing P16505**



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- d. Subsequent Certification Due Listing P16102
 - e. Update Transaction report P16504
 - f. Edit reports P16193
5. Reports that may be discarded when their usefulness is completed are listed below. No special safeguards or destruction methods are required.
- a. Participation and Enrollment by Priority reports, P16115 and P16111
 - b. Racial/Ethnic Participation and Enrollment reports, P16116 and P16110
 - c. Vendor Number Listing report P16411
6. Records and reports not listed in this policy may be subject to retention. As new reports are generated, retention instructions will be provided.
7. Participant records, dual participation reports and identified program records must be destroyed in such a way that they are no longer reproducible. The approved methods to accomplish this are:
- a. Shredding
 - b. Incineration
 - c. Landfill

NOTE: Please assure that records are securely stored prior to destruction. This applies especially to records that go to a landfill. Records that are to be recycled must be shredded or made unreadable prior to recycling.

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B. GUIDANCE

- 1. MDPH WIC Division will issue a letter to local agencies each March stating the time period for which participant records and dual participation reports may be destroyed.**
- 2. Prior to destruction of participant records and dual participation reports, the local agency must determine if all agency audits and litigation are completed for the period of these records.**
 - a. If audit and litigation process are completed, the records and reports may be destroyed.**
- 3. Records which report group data and contain no individual participant identification may be discarded or recycled. Destruction methods described in Policy Statement 7 are not required for these records. Example: Participation and Enrollment by Priority reports P16115 and P16111 may be discarded or recycled without destruction.**

Reference:

Federal Regulations 246.2 (5)(a)(2)

Cross Reference:

Policy 8.22