

MI-WIC POLICY

Administration

1.0 Administration

1.06 Record Retention and Destruction

Effective Date: 02/25/2014

PURPOSE: The purpose of this policy is to identify recordkeeping retention and destruction requirements for WIC records. WIC records provide documentation of WIC services and expenses.

A. POLICY

1. Records, whether electronic or hard copy, that contain confidential client information must be stored in a secure manner. All records and reports that contain confidential client information shall be stored or kept in a locked area. Electronic records shall be kept under direct supervision at all times. Electronic communications containing client information shall be encrypted prior to transmittal. See Policy 1.03 Confidentiality.

Note: There is no requirement for printing reports or records from the MI-WIC data system except where necessary for documentation of compliance investigations.

2. Michigan WIC Employee Signature forms must be retained in the employee's personnel file according to State of Michigan Records Management Services' requirements. Additional copies maintained by other personnel may be discarded 3 years, 150 days after the completed fiscal year*.
3. Local Agencies must retain the following WIC records for 3 years, 150 days after the completed fiscal year*:
 - a. Laboratory Logs. See MI-WIC Policy 2.16 Hematological Risk Determination.
 - b. Returned Formula Logs. See MI-WIC Policy 8.05 Returned Formula.
 - c. Michigan WIC Bridge Card Inventory and Issuance records. See MI-WIC Policies 8.08 Michigan WIC Bridge Card Security and 8.09 Michigan WIC Bridge Card Issuance.
 - i. Michigan WIC Bridge Card inventory (bulk and daily use)
 - ii. Michigan WIC Bridge Card issuance logs/signature forms.
 - d. Dual Participation materials (see MI-WIC Policy 3.03 Dual Participation):
 - i. Paper reports or investigation materials generated by the agency that documents verification of WIC/WIC and WIC/Focus: HOPE dual participation.
 - ii. Documentation materials used for identification/investigation of dual enrollment/participation with Commodity Supplemental Food Program (CSFP) not including Focus: HOPE.
 - e. Compliance Investigation/Sanction materials not retained in the MI-WIC system. See MI-WIC Policies 9.01 Client Compliance, 9.03 Employee Compliance.
 - f. Fair Hearing requests and documentation. See MI-WIC Policy 1.04 Fair Hearing Procedures for Clients.
 - g. Quality Assurance: Records from quality assurance activities, clinic reviews

- and observations. See MI-WIC Policies 1.05 Management Evaluation and 1.11 Annual Quality Services Review.
- h. Single-certifier audit tools.
 - i. Staff credentials verifications. See MI-WIC Policy 1.07 Local Agency Staffing.
 - j. Local Agency Training Records not recorded in MI-WIC.
 - k. Program Records: Agency specific records, contracts, budgets and administrative hearing records.
 - l. Equipment Inventory. See MI-WIC Policy 10.01 Equipment Inventory.
4. Voter declination forms must be kept for 2 years from the date of completion. See MI-WIC Policy 1.10 Voter Registration.
 5. The following records may be destroyed after use or after the data/documents have been entered/scanned into the MI-WIC system:
 - a. Client and Family Health and Diet Assessment or other records used to gather information and subsequently recorded in MI-WIC.
 - b. Scanned Documents:
 - i. Documents (e.g., Medical Documentation forms, Breastpump issuance/return records) scanned for retention in MI-WIC.
 - ii. Verification of identification, residency, income or pregnancy for clients enrolled by a “single certifier”. See MI-WIC Policy 9.03 Employee Conflict of Interest.
 - c. Printed dual participation reports if the agency documents follow-up and resolution in the client’s MI-WIC record. See MI-WIC Policy 3.03 Dual Participation for WIC/WIC and WIC CSFP dual participation procedures.
 6. Prior to destruction of WIC records, the local agency must determine that all agency audits and litigation pertaining to the information are completed for the period of these records.
 7. If an audit or litigation is pending for the period of the records, the records must be retained until completion of the audit or litigation process.
 8. Records created prior to MI-WIC implementation may be destroyed.
 9. All records and printed reports containing client identifiers (e.g., names, addresses, phone numbers, and client IDs) must be destroyed in a manner that protects confidentiality. 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 containing client information that are to be recycled must be shredded or made unreadable prior to recycling.

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

Reference:

Federal Regulations 246.25(a)
State of Michigan Records Management Services, Retention and Disposal Schedules, Web. October 2013, <<http://www.michigan.gov/recordsmanagement>>

Cross Reference:

1.03 Confidentiality
1.04 Fair Hearing Procedures for Clients
1.05 Management Evaluation
1.07 Local Agency Staffing
1.10 Voter Registration
1.11 Annual Quality Services Review
2.16 Hematological Risk Determination
3.03 Dual Participation
8.05 Returned Formula
8.08 Michigan WIC Bridge Card Security
8.09 Michigan WIC Bridge Card Issuance
9.01 Client Compliance
9.03 Employee Compliance
10.01 Equipment Inventory Policy