
300.30

Document Retention

Overview

Introduction

All records pertinent to a USDA grant must be available to representatives of the state or federal government for purposes of making an audit, examination, excerpts or transcripts.

Determining the retention period

All WIC documentation records must be retained for a minimum of five years following the date of submission of the final expenditure report for the period to which the report pertains. Therefore, for practical purposes, the retention period is six years from the beginning of the 12-month contract period.

Example

A 12-month contract period is October 1 to September 30. The final expenditure report for that grant is submitted in December - when the five-year retention period begins. The retention period is approximately six years from the beginning of the contract period.

Reference: Iowa Department of Public Health General Conditions

Exceptions

If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the five-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular five-year period, whichever is later.

Documents may also be retained beyond the five-year period when a contract agency's internal policies dictate.

Records included

See page 2 for a list of records subject to the five-year retention period, and a list of additional documents that have varying retention periods.

Contract and Clinic Documents

Records to be retained Contract management, clinic services documents and other supporting documents, breastfeeding peer counseling program reporting documents, copies of subpoenas and search warrants and statistical records pertinent to the WIC contract must be retained for the minimum period.

Note: In no case should these documents be disposed of prior to the five-year requirement.

Contract management The following contractual, accounting and personnel records must be retained for the minimum period:

- WIC proposals, applications, contracts and related correspondence
 - WIC Time Study Reports and actual daily time records
 - Action plans
 - Staff training and education records
 - Contracts and agreements with other providers
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Clinic services The following clinic services records must be retained for the minimum period:

- Rights and Responsibilities
- Notice of termination
- Notice of ineligibility
- Proxy cards
- Precertification forms
- Signed statement forms (no proof of documentation)
- Missed prenatal appointment logs,
- Special Food and Formula Documentation forms,
- Food instrument issuance and redemption records,
- Participant violation, disqualification, and restitution forms,
- Participant complaints,
- Custody documentation,
- Verification of Certification forms received, and
- Breastpump loan agreements

Note: Immunization records and referral forms are not required to maintain, but would be helpful to maintain for future reference.

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Contract and Clinic Documents, Continued

Method of storing clinic services records

Depending on the document, clinic services records may either be maintained by electronically scanning the document into the Focus system, documenting via electronic signature, or by placing a comment/alert in the data system verifying that the participant received the document. Please follow the following requirements below when maintaining clinic records.

- Rights and Responsibilities – Electronic signature from participant
 - Notice of termination – Comment/alert in the data system
 - Notice of ineligibility – Electronic signature from participant and comment/alert in the data system.
 - Proxy cards – Scanned document
 - Precertification forms – Scanned document
 - Signed statement forms (no proof of documentation) – Scanned document
 - Missed prenatal appointment logs – Scanned document
 - Special Food and Formula Documentation forms – Scanned document
 - Food instrument issuance and redemption records – Information stored within the data system
 - Participant violation, disqualification and restitution forms
 - Participant violation and disqualification forms: Electronic signature from participant,
 - Restitution form: Scanned document
 - Participant complaints – Scanned document if possible, otherwise comment/alert in the data system
 - Custody documentation – Scanned document
 - Verification of Certification forms received – Scanned document
 - Breastpump loan agreements – Scanned document
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Scanned clinic services records

Documents that are scanned and saved into the data system must be

- Deleted from the computer and
- Shredded immediately

Forms should be saved using consistent language (example: name of form, participant first name, date).

WIC data system reports

It is unnecessary to retain most WIC data system reports.

Participant Records

WIC participant records

WIC-only records are non-medical and must be retained for a period of five years from date of termination.

Combined records

Combined WIC/MH or WIC/CH records are considered medical records and must be retained for a period of six years from submission of the final expenditure report or in the case of a minor client, for a period of one year after the client attains the age of majority, whichever is later or until transfer or the Department authorizes disposal.

Reference: Iowa Department of Public Health General Conditions

Access to records

Direct access to the WIC data system and participant records is limited to WIC staff due to security access. Sharing of information across the Maternal or Child Health (MCH) programs within the same agency is permitted without a written agreement to ensure continuity of care and avoiding duplication of services.

Outreach information, including participant name, address, phone number, date of birth, and WIC participant category, may be shared with all Head Start programs and MCH programs located outside of the local WIC agency. However, sharing of additional information requires a release of information with a participant signature.

Note: See Policy 215.95 and 245.05

HIPPA

The Health Insurance Portability and Accountability Act (HIPPA) does not apply to or require compliance by the WIC Program.

References: WIC Final Policy Memo #2002-2; <http://aspe/hhs/gov/admnsimp/>
