

X. Monitoring and Audits

10.1.070 Local Agency Record Retention and Destruction/Audit Letter

Authority 2008 7 CFR 246.25(a) & Mo. State Statutes 516-105

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POLICY: The local agency (LA) shall maintain records concerning WIC program operations pertaining to fiscal operations, food delivery systems, food instrument issuance and redemption, equipment purchases, and inventory, certification, nutrition education, civil rights fair hearing procedures and complaint information by and about the participant.

All records shall be retained for a minimum of three years following the date of submission of the final expenditure report for the period to which the report pertains or until any litigation, claim, negotiation, audit or other action involving the records, which was started before the end of the 3-year period has been resolved.

LA WIC records shall be maintained until the SA sends the LA an audit clearance letter authorizing record destruction. Local health agencies shall retain health and nutrition assessment records upon recommendations of their governing board and the board attorney. Refer to [Missouri State Statute RSMo 516.105](#).

Records must be destroyed in a manner that protects the confidentiality of WIC participants and vendors by the following methods: shredding, supervised burning or incineration.

PROCEDURES:

- A. State statutes require maintenance of medical records for a period longer than the WIC three-year guideline. The LA shall consult with the agency legal counsel and governing body for a decision regarding whether or not WIC participant charts are considered medical records.
- B. The LA will use and must retain, as applicable, paper copy or electronic version of the following records in accordance with this policy:
 1. Computer printouts or electronic reports for HANDS and MOWINS that serve as payment and/or source documents:
 - a. HANDS Food Instrument Registers - Manual & Computer
 - b. Participation by Service Delivery Month, Priority and Race (837-01 for HANDS)
 - c. Participation Totals Reported - Final report of fiscal year only (425-01 for HANDS)
 - d. Dual Issuance Report
 2. Forms, which serve as payment and source documents:
 - a. WIC-24 - Monthly Administrative Cost Report

- b. DH-70 - Professional Services Contract
 - c. DH-71 - Contract Amendment
3. Other materials and information, which serves as source documents:
- a. Correspondence from SA
 - b. Equipment inventory
 - c. Evaluations of LA Plans (LAP)
 - d. Financial source documentation
 - e. LAP
 - f. Monitoring reports, corrective action plan (CAP) and CAP approvals
 - g. News releases submitted to local media
 - h. Outreach documentation
 - i. Audit documents
 - j. HANDS Food instrument inventory records
 - k. Complaint information by and about the participant
- C. Complete participant files may require longer retention due to state statutes related to medical records. Refer to A. above. These include:
- 1. WIC-1 - WIC Certification-Women Only (HANDS)
 - 2. WIC-2 - WIC Certification-Infant/Child (HANDS)
 - 3. WIC-10 - Rights and Responsibilities Participant Signature (HANDS-direct entry agencies)
 - 4. WIC-19 - Notification of Ineligibility (HANDS)
 - 5. HWPR - Certification Summary (HANDS)
 - 6. All materials used to assess, determine eligibility, or prove service offered, such as:
 - a. Growth charts
 - b. Physician documentation & referral
 - c. High-risk care plans
 - d. Nutrition education documentation forms
 - e. WIC-30 - Income Assessment Worksheet
 - f. Documentation for special food packages issued
 - g. Nutrition Assessment forms
 - h. WIC-29 - Special Formula Documentation Form
 - i. Proxy notes

- D. As a permanent record, the LA shall maintain documentation of the destruction including all of the following:
 - 1. Overall content of records destroyed.
 - 2. Period covered in records destroyed.
 - 3. Method, place, and date of destruction.
 - 4. At least one signature of staff participating in destruction.
- E. Documentation may be maintained directly on the audit closure letter.
- F. If instructed to do so by the SA or FNS, the LA shall not destroy program records of historical interest, but shall forward such records to the SA.
- G. The audit closure letter will:
 - 1. Be signed by the State WIC Director.
 - 2. Specify the exact time period for which records may be destroyed.
 - 3. Be posted on the WIC Updates website on the WIC web pages.
- H. When the letter is received, the LA may destroy all WIC records covered by the time period specified unless otherwise restricted by local or state statutes. (See A above.)