

## Record Retention

- I. WIC files must be kept for Federal or State auditors' review for the length of time specified below:
  - a. Participant files for women, infants and children may be destroyed after 4 years following the end of the fiscal year when the files were closed.
  - b. All other files and reports including, but not limited to, information pertaining to financial operations, food delivery systems, food instrument and cash value voucher issuance and redemption, equipment purchases and inventory, certification, nutrition education, civil rights and fair hearing procedures may be destroyed after 4 years.
  - c. Electronic records within the VISION system are maintained by the state agency for at least a minimum of four years.
- II. If any litigation, claim, negotiation, audit or other action involving the records has been started before the end of the 4 year period, the records should be kept until all issues are resolved.
- III. If electronic images of historical documents are maintained, then hard copies do not need to be retained. Any hard copy documents that were scanned into the VISION system do not need to have the hard copies retained on file. These may be shredded after they are scanned.
- IV. Specific procedures must be followed prior to destroying any WIC files.
  - a. Describe all files to be destroyed on a log. This log should be kept in the clinic for review. The log must contain:
    - i. Record types to be destroyed
    - ii. Record dates or fiscal year closed
    - iii. Date destroyed
    - iv. Method of destruction
    - v. Signatures of two persons witnessing destruction.
  - b. Destruction should be completed according to local health department policy.
    - i. Shredding or burning are acceptable methods of destruction.
    - ii. Disposal of records at a dumpsite is not an acceptable method of destruction.
    - iii. Destruction may be completed by a third party contractor if approved by local health department policy. Two witnesses must sign the log that the documents to be destroyed were deposited to the contractor.

- c. When it is the county/agency policy to send records to archives that will later be destroyed by the archiving agency, maintaining documentation on file of records that were sent to archives is sufficient to meet the document destruction log requirement.
- d. It is acceptable but not required to request permission of the State office to destroy documents as long as the destruction is completed according to policy.