



Policy 426
Record Retention
June 28, 2019

POLICY

Local WIC programs shall retain WIC records for the time period indicated.

PURPOSE

To ensure the orderly retention of WIC records for legal, fiscal, or administrative audits and monitoring, regardless of medium or physical format.

RELEVANT REGULATIONS

7 CFR §246.25(a)—Records and Reports: Record-keeping requirements

OAR 166-150-0065(20)—Oregon State Archive’s Rule for Health Departments Records on Public/Community Health Records; Public Health Service Records

OAR 166-150-0035(15)—Oregon State Archive’s Rule for Voter Registration Records

OAR 166-017—Electronic Records

OAR 166-020—The Protection and Storage of Public Records

OAR 166-300—State Agency General Records Retention Schedules

ANSI/AIIM MS44-R1993

OREGON WIC PPM REFERENCES

- ◆ [420—Approval Process for Local Program Policies and Procedures](#)
- ◆ [440—Staff Training Requirements](#)
- ◆ [480—Voter Registration: National Voter Registration Act](#)
- ◆ [650—WIC Transfers/VOC and WIC Overseas Program](#)

APPENDICES

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DEFINITIONS

Aggregate files: Any filing system where documents are sorted and filed by a method other than in individual participant paper charts.

CFRs: Code of Federal Regulations.

Last service: Date of last WIC service provided to the participant.

OARs: Oregon Administrative Rules.

Retention Period: The minimum length of time a record must be retained as authorized by an applicable retention schedule published in the Code of Federal Regulations (CFR) and

the State Archives Division in the Oregon Administrative Rules (OAR), or recommended by the State WIC Program.

WIC records: Documents containing information relating to WIC services provided to WIC participants; WIC program operations; and local program staff training, regardless of medium or physical form.

BACKGROUND

N/A

PROCEDURE

Retention period for participant records

- 1.0 Participant records are WIC records documenting the WIC services provided to participants. The OARs require the retention period for WIC participant records relating to certification that are not documented in TWIST be **six years after the last service**. These records include but are not limited to:
 - 1.1. Any form that requires the participant's signature such as:
 - 1.1.1. "Participant Signature Form" (form [57-629](#)): Participants sign this to indicate they have been notified of and understand their rights and responsibilities as WIC participants, as well as authorization and release of information and consent for services.
 - 1.1.2. "No Proof Form for Special Situations" (form [57-633](#))
 - 1.1.3. Any applicable local program forms
 - 1.1.4. WIC Transfer/VOC cards: Attach the Transfer/VOC card to the Rights and Responsibilities form signed by the incoming participant and file together. Please refer to [◆650—WIC Transfers/VOC and WIC Overseas Program](#).
 - 1.2. Medical Documentation forms (form [57-636](#)) from health care providers
 - 1.3. Medical correspondence from or to a participant and to or from a provider regarding a participant.
 - 1.4. Local agencies should not retain copies of proofs or other information that could be used for identity theft.

Retention method for participant records

- 2.0 All WIC participant records retained in paper form may be kept in aggregate files.
 - 2.1. Any WIC participant record retained in an aggregate file must be retrievable upon request.
 - 2.2. If aggregate files are used, the retention period should be based on the record of the youngest participant in the file. If the age and last service date of the youngest participant is not readily available, assume that the file likely contains a newborn with a last service equivalent to their fifth birthday and retain the file for eleven years from the date the file is collected.

Example: An aggregate file with participant records signed on July 15, 2010 would be retained until July 15, 2021. This includes five years for any newborn in the file to reach their fifth birthday and an additional six years for the required retention period.

2.3. Participant records may be kept electronically and must follow all relevant rules and regulations. Please refer to ♦OAR 166-017, OAR 166-020, and ANSI/AIIM MS44-R1993.

2.3.1 A written local agency policy and procedure is required to identify procedures for electronic record storage. This policy and procedure must be submitted to the State Agency prior to implementation. Please refer to ♦[420—Approval Process for Local Program Policies and Procedures](#). The policy and procedure must address the following items:

- Scanner inspection procedures:
 - Who will inspect the scanner to ensure it is working properly.
 - How often the scanner will be inspected.
 - How the scanner will be inspected to ensure it is working properly.
 - How the inspection of the scanner will be documented.
 - Who will ensure the scanned documents are readable and good quality.
 - How the scanned documents will be inspected to ensure they are readable and good quality.
- Security plan:
 - Where the electronic files will be stored.
 - How access to the files will be granted to ensure protection of confidential applicant and participant information.
 - How the electronic files will be kept secure physically and electronically.
 - How the electronic files will be named and organized for easy recovery.
- Backup and recovery plan:
 - Where the offsite storage of backup files will be located.
 - How the offsite storage backup files will be protected physically and electronically.
 - The type of fire-resistant structure the backup electronic files will be stored in.
 - How access to the backup files will be granted to ensure protection of confidential applicant and participant information.
 - How often a new backup copy of all files will be saved.
 - How the electronic files will be recovered if the main files are destroyed or lost.

Retention period for staff training records

3.0 Staff training records are WIC records documenting the completion of each training module by a local WIC program staff person.

- 3.1. The retention period for local WIC program staff training records is **three** years following the date of separation from service. Please refer to [◆440—Staff Training Requirements](#), for forms to be retained after completion of each training module.

Retention of other WIC records

- 4.0 Other WIC records are documents that may include information pertaining to WIC program operations. The CFRs require the retention for these documents be **three** years. These include but are not limited to:
- abuse or civil rights complaint logs;
 - civil rights and fair hearing procedures;
 - voucher signature stubs;
 - eWIC card inventory logs;
 - Farm Direct check registers;
 - quarterly individual time studies, or
 - breast pump loan agreements and breast pump release forms.

Retention of NVRA forms

- 5.0 The retention period for the declination portion of the “Agency Voter Registration Form” from the Elections Division is **two** years. Please refer to [◆480—Voter Registration: National Voter Registration Act](#).

Record retention schedule

- 6.0 Local programs shall retain WIC records according to the retention period indicated. Please refer to Appendix A for a listing of miscellaneous WIC records and their retention period.

Purpose for retention

- 7.0 Retain these WIC records in case of any litigation, claim negotiation, audits, and for local program reviews.

POLICY HISTORY

Date	* Major Revision, Minor revision
9/10/2015	Revised
6/28/2019	Major Revision

The date located at the top of the policy is the implementation date unless an “effective date” is noted on the policy. Policies will become compliance findings 6 months from the implementation date.

Release notes can be found in the corresponding document on the [Policy and Procedure Manual page](#).

**Major Revisions: Significant content changes made to policy.*

Minor Revisions: Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

Date of Origin: Date policy was initially released

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alternate format, please call 971-673-0040.**

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APPENDIX A

WIC Records Retention Schedule

Below is a list of forms or reports with the required retention period.

600 Series — Certification Forms & Applicant/Participant Materials		
Form Number	Form or Report Title	Retention Period
57-629	Participant Signature Form	6 years after last service for individual files or 11 years after last date of service for aggregate files. See ¶2.0 for more information.
57-633	No Proof Form For Special Situations & Income Averaging	
57-636	Medical Documentation Forms from health care provider	
700 Series — Nutrition Services		
57-750	Multi-User Electric Breast Pump Loan Agreement	3 years after last service for individual files. See ¶4.0 for more information.
57-751	Breast Pump Release Form	3 years after issuance. See ¶4.0 for more information.

Miscellaneous WIC Forms		
Form Number	Form or Report Title	Retention Period
SEL-503	Motor Voter: Agency Voter Registration Forms (Declination Form)	2 years
N/A	Quarterly Individual Time Studies	3 years
N/A	Staff Training Module or Online Course Completion Forms (Post-tests or completion forms for online courses and Competency Achievement Checklists for each required module or course)	3 years from date of separation of service

Miscellaneous WIC Reports and Records		
Report Number	Report Title	Retention Period
N/A	Voucher Stub	3 years
N/A	eWIC card inventory logs	
N/A	Farm Direct Nutrition Program Check Register/Issuance List	
N/A	Electronic Record Inspection Forms	