

**Indiana WIC Program
Indiana State Department of Health**

Clinic Records Storage, Retention and Disposal

Policy

The local agency shall maintain complete records concerning program operations. Prior approval from the state agency shall be obtained before any clinic records are destroyed.

Authority

7 CFR Part 246.25(a)(1)(2)
IC 16-39-7-1 (Medical Record)
IC 12-32-1-6 (Restrictions on Public Benefits-maintain verification)

Procedures

- I. The Communications screen of the INWIC displays the record of documents at the household and the client level. The documents shown on the Communications screen are retained indefinitely.
 - A. Records saved at the client level will transfer electronically when the client changes households.
 - B. Records saved at the household level will stay with the household with in-state transfers.
- II. Electronically signed (e-signed) documents display on the Communications screen at the household level. Electronically signed records include:
 - A. WIC Signature Page for Certification – Step 2: Consent for Services,
 - B. WIC Signature Page for Certification – Step 3: Rights and Obligations, and
 - C. No Proof Letter.
- III. System generated documents display on the Communications screen at the client level. These documents include:
 - A. Verification of Certification (VOC)
 - B. Notice of Certification Expiration

- IV. Scanned documents display on the Communications screen, based on the document, at either the household level or the client level. These documents include:
- A. Communications for Household
 - 1. WIC Signature Page for Certification – Step 1: Eligibility for Public Benefits (used for applicants 18 years of age or older at time of Certification)*
 - 2. Attachment A (if applicable to the agency)
 - 3. Sanctions Due to Program Violations**
 - B. Communications for Client
 - 1. 30 Day Benefit Notification
 - 2. Breast Pump Agreement
 - 3. Custody Papers (if provided)
 - 4. Medicaid Letters (Denial/Approval of exempt infant formula or WIC eligible nutritionals)
 - 5. Notice of Ineligibility
 - 6. Physical Presence Statement (provider statement)
 - 7. Provider prescription or Medical Documentation form
 - 8. WIC Release of Information
 - 9. Sanctions Due to Program Violations
 - 10. Termination Letter
 - 11. Waiver of Bloodwork
- *A copy of the WIC Signature Page for Certification – Step 1: Eligibility for Public Benefits, will be filed in the Daily file.
- **A copy of the Sanctions Due to Program Violations will be filed in the Client Sanction file.
- V. The local agency will determine a method of filing hard copy clinic records (e.g. by the month or by the day) that is most efficient for the agency.
- A. The same filing method must be implemented in all clinic locations within the agency, except hospital clinic sites.
 - B. Files must be stored in locked cabinets, or in a locked file room or area that is not accessible to persons not employed in the WIC program. The cabinets or room/area must be locked at the end of each clinic day.

VI. In addition to records maintained on the Communications screen, each clinic site must maintain the following hard copy records after implementation of INWIC:

- A. Daily file – all WIC Signature Page – Step 1: Eligibility for Public Benefits after scanning into INWIC.
- B. Client Sanction file – all Sanctions Due to Program Violations forms after scanning into INWIC.
- C. Transmittal of Voter Registration Materials (VRG-9) and Receipt file.
- D. Returned formula log file.
- E. Unusable eWIC Card Log file.
- F. WIC Temperature, Cleaning and Control Log file.
- G. Client complaint file.
- H. Subpoena, Search Warrant, Court Order file.
- I. Breast Pump Logs.

VII. During times when the e-sign or scanning method is inoperable staff will utilize manual hard copies. The hard copies will be maintained in the Daily file. Medical documentation forms or physician prescriptions will be scanned into the client record once scanning regains function.

VIII. Records will be retained based on Federal Regulation and/or State Code requirements.

- A. Transmittal of Voter Registration Materials (VRG-9) and Receipt file must be retained for two years from the date of the transmittal.
- B. Records that must be retained for three years beyond the closeout of the fiscal year include but are not limited to:
 - 1. Release of Information file prior to FY17 closeout,
 - 2. food instrument issuance records/check records generated prior to FY17 closeout,
 - 3. food instrument inventory records generated prior to FY17 closeout,
 - 4. unusable eWIC Card Log file,
 - 5. Letter E (Lost/Stolen/Destroyed Checks) issued prior to FY17 closeout,
 - 6. Client Sanction file,
 - 7. Staff in-service education attendance records,
 - 8. Civil Rights and fair hearing records,
 - 9. Subpoenas, search warrants and court orders, and
 - 10. Client complaint file.

- C. Records that must be kept for five years beyond the closeout of the fiscal year include:
1. Daily file
 2. Ineligible/Terminated file [i.e. Ineligible/Terminated]
- D. Records that must be kept for seven years beyond the closeout date for the fiscal year include:
1. Prescription file (considered a medical file) prior to FY17 closeout.
 2. Returned formula log
- E. Infant and child paper records must be held for seven years beyond the closeout date for the fiscal year in which the child turned five.

To determine purge dates:

During 2nd Qtr. of FY	Purge Files with				
	Paper Records of Infants/ Children* Born during FY	Limit of 2 years from date of Transmittal Voter Registration Transmittal Files	Limit of 3 years from CO for FY	Limit of 5 years from CO for FY	Rx and Returned Formula Logs for FY
2016	2003	2013	2012	All Daily, Terminated and Ineligible Files	2008
2017	2004	2014	2013		2009
2018	2005	2015	2014		2010
2019	2006	2016	2015		2011
2020	2007	2017	2016		2012
2021		2018	2017	2015	2013
2022		2019	2018	2016	2014
2023		2020	2019	2017	2015
2024		2021	2020	2018	2016
2025		2022	2021	2019	2017
2026		2023	2022	2020	2018
2027		2024	2023	2021	2019
2028		2025	2024	2022	2020

*Paper records for Infants and Children were discontinued in 2007.

- IX. Approval must be received from the Indiana WIC Office before destroying any records.
 - A. Requests must be submitted to the Indiana WIC Office using the Request for Disposition of Records (SF48055).
 - B. Records must be disposed of through incineration or shredding. Under no circumstances may records be disposed of through trash removal.