

**1.04**

**Record Retention**

---

**POLICY:**

The Local Agency will maintain full and complete records concerning Program operations in accordance with Federal guidelines.

**PROCEDURE:**

**A. Retention of Records**

Records maintained by the Local Agency will include, but not be limited to information pertaining to:

- Financial operations;
- Food delivery systems;
- Food benefit issuance;
- Equipment purchases and inventory;
- Certification;
- Nutrition Education;
- Civil rights;
- Fair hearing procedures; and
- Correspondence from the State Agency.

**B. Duration of Retention**

1. All records will be retained for a minimum of three (3) years and one-hundred fifty (150) days following the date of submission of the final expenditure report for the period to which the report pertains.
2. If any litigation, claim negotiation, audit or other action involving the records has been started before the end of the three (3) year and one-hundred fifty (150) day period, the records will be kept until all issues are resolved, or until the end of the regular three (3) year and one-hundred fifty (150) day period, whichever is later.
3. Records for nonexpendable property acquired in whole or in part with Program funds will be retained for three (3) years and one-hundred fifty (150) days after its final disposition.

**1.04 Record Retention**

---

**C. Access to Records**

All records, except medical case records of individual participants (unless they are the only source of certification data), will be available during normal business hours for representatives of the Department of Comptroller General of the United States to inspect, audit and copy.

**D. Disposal of Records**

Disposal of participant records will be restricted to methods (i.e., incineration or shredding) that will ensure confidentiality.

**E. Retention of Legacy System (STORC) Chart Records**

The Crossroads System does not require paper records; however, legacy system (STORC) chart records will be maintained for the required three (3) years and one hundred and fifty (150) days.

**REFERENCES:**

1. WIC Regulations 246.25, Records and Reports
2. FNS Instruction 817-1, Accessibility of Records