
FOOD AND NUTRITION SERVICES MANUAL
GENERAL PROCEDURES & REQUIREMENTS
FNS 130 RECORDS RETENTION, OWNERSHIP, AND DOCUMENTATION

FNS 130 Records Retention, Ownership, and Documentation

Change #1-2021

May 1, 2021

130.01 RETENTION OF RECORDS

- A. All programs must follow the guidance provided by the controller's office to determine the required length of record retention.

The record retention schedule can be viewed at:

<https://www.ncdhhs.gov/about/administrative-offices/office-controller/records-retention> .

The county Department of Social Services (DSS) keeps records and submits accurate and timely reports and other information as may be required from time to time by the State and Food and Nutrition Service (FNS).

1. Certification Records - Certification records are available for review and audit by FNS or the United States Department of Agriculture (USDA) for a period of three years from the month of origin of each record. The three-year retention is required by federal regulations and applies regardless of whether or not an audit or review is performed in the three-year period.
 - a. North Carolina Controller's Office may require longer retention for certification records. Refer to DHHS Records Retention and Disposition Schedule at web address listed above.
 - b. Records containing an Intentional Program Violation (IPV) disqualification and/or an IPV claim must be retained indefinitely.
 - c. Records entered into NC FAST cannot be deleted at the county department of social services level. They will be retained in NC FAST until all audits have been completed and time-limits have been met.
2. Fiscal Records - Fiscal records and accountable documents must be retained for three years from the date of fiscal or administrative closure. Refer to DHHS Records Retention and Disposition Schedule at web address listed above. Fiscal closure means that obligations for or against the federal government have been liquidated. Administrative closure means that the State agency has determined and documented that no further action to liquidate the obligation is appropriate.

130.02 RECORD OWNERSHIP

- A. All client files are the property of the county DSS, and employees of the agency must safeguard the confidentiality of information in the files. The requirement that the confidentiality of client information be safeguarded applies regardless of whether the caseworker is working in the agency or at home.
- B. The agency must provide a secure place or places with controlled access for the storage of records. Only individuals who must access client information in order to carry out

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assigned duties or who are approved by the agency shall have access to the record storage areas. Only authorized individuals may remove a client record from the storage area. The authorized individual is responsible for the security of the record until it is returned to the storage area.

- C. The agency is responsible for establishing security procedures to prevent unauthorized disclosure of client information from automated systems. The county DSS director is responsible for ensuring that all authorized individuals are informed of the confidential nature of client information and that training is provided for all persons with access to client information.
- D. Volunteers, interns and contract employees are treated the same as county DSS employees for the purposes of confidentiality and security of records.

130.03 CASE RECORD DOCUMENTATION

- A. Verifications are the means by which points of eligibility are determined to be accurate.
- B. Documentation means the type of verification and a summary of the information obtained has been entered in the appropriate evidences and/or case notes in NC FAST.
 - 1. Documentation must be detailed so that a County, State, or Federal reviewer is able to determine the reasonableness of the determination.
 - 2. Documentation also applies to updating the case record to reflect that all program requirements have been met in the processing of an application, redetermination, or change in circumstances impacting eligibility.