

Federal Grant and Contract Records Management Policy

Purpose

The University governs its operations through ordinances, policies, procedures and guidelines. This policy complies with the Record Retention and Access requirements articulated in [2 CFR 200.333 – 200.337](#).

Scope

This policy applies to the University's responsibility for proper retention and disposition of records associated with Federally funded grants and contracts whether the University is a direct grantee or a subrecipient of an award.

Definitions

| Term | Definition |
|---------------------------|--|
| Records | Applications, financial records, supporting documents, statistical records, and all other records related to grant and contract awards made to the University by Federal entities. |
| Retention | The period of time during which all records related to Federally funded awards must be maintained. |
| Record retention schedule | Documentation identifying and describing the periods during which Federally funded records will be retained and the process for disposition once the retention period has passed. |
| Disposition | The process of destroying and/or discarding records once the retention period concludes. |

Policy

This policy applies to records that exist both in paper and electronic form. Records must be retained for a period of three years from the date of submission of the final expenditure report. For Federal awards renewed quarterly or annually, records must be retained for three years starting from the date that the quarterly or annual financial report is submitted. In the event that litigation, a claim, or an audit is started before the expiration of the three-year period, the records must be maintained until final disposition of the litigation, claim or audit.

Procedure

1. Upon submission of final report materials (both narrative and financial), the disposition date for records will be added to the Sponsored Research Office (SRO) Grants Dashboard spreadsheet, the SRO Google calendar, and the equivalent systems in University Advancement.
2. When the records disposition date arrives, records will be destroyed or discarded as follows:
 - a. Paper versions will be destroyed by shredding
 - b. Electronic versions will be removed from Google Drive (online and externally backed up) and deleted.

Implementation

The Sponsored Research Office and the University Advancement Office share joint responsibility for retention and disposition of records.

Effective Date/Approval

This policy follows the University Policy Framework adopted in 2015.

Effective date: July 29, 2020.