

<b>Policy on Record Retention</b>	<b>Effective Date:</b> <b>July 15, 2014</b>
<b>Related Policies and Procedures:</b>	

## **I. GENERAL STATEMENT**

This Policy sets forth the requirements for effectively retaining and managing records and ensuring access to records is granted in accordance with applicable law, regulation, and sponsor policy. This Policy applies to all Principal Investigators (PIs), co-PIs, and any other person with a role or responsibility in the application for, receipt of, or administration of sponsored projects.

## **II. DEFINITIONS**

- A. OMB Circular A-110: The document published by the federal government's Office of Management and Budget establishing uniform administrative requirements for grants to and agreements with institutions of higher education, hospitals, and other non-profit organizations.
- B. Principal Investigator: The individual designated by the University as responsible for the scientific or technical direction of the sponsored project. The Principal Investigator is also part of the University team responsible for a sponsored project's financial and administrative compliance.
- C. Record: Financial, supporting, or statistical information that is pertinent to a sponsored project and that is either tangible or stored electronically on any media or in any format including, but not limited to: paper, writings, emails with attachments, electronic or microfilm document, photograph, blueprint, or audio or video recording

## **III. PROCEDURE**

### **A. Retention Period**

Unless sponsor terms and conditions provide for a longer retention period, the appropriate University official will retain financial records, supporting documents, statistical records, and all other records pertinent to a sponsored project for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report.

Copies of original records may be maintained in place of the original records if authorized by the sponsor.

#### B. Exceptions to Retention Period

Records must be maintained beyond the three year retention period if any of the following situations apply:

1. If any litigation, claim, or audit commences before the expiration of the three year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
2. Records for real property and equipment acquired with Federal funds shall be retained for three years after final disposition of the real property or equipment.
3. Indirect cost rate proposals and cost allocation plans should be retained in accordance with OMB Circular A-110.

#### C. Access to Records

The award sponsor or duly authorized representative will have timely and unrestricted access to any books, documents, papers, or other records of recipients that are pertinent to the awards, in order to make audits, examinations, excerpts, transcripts and copies of such documents. If the sponsored project was Federally-funded, the Inspector General, Comptroller General of the United States, or any of their duly authorized representatives will have this same right of access.

This access right also includes timely and reasonable access to the University's personnel for the purpose of interview and discussion related to such documents.

The University will make records or personnel available in accordance with any sponsor terms or conditions exceeding the foregoing, which is derived from OMB Circular A-110.

#### D. Disposal of Records

If, consistent with this Policy, it is appropriate to dispose of any sponsored project records, these records should be destroyed using one of the following methods:

1. Recycle non-confidential paper records;
2. Shred or otherwise render unreadable confidential paper records; or
3. Erase or destroy electronically stored data with assistance from the Office of Information Technology.

University records should be reviewed to determine whether disposal is appropriate no less than once every 2 years.

E. Failure to Comply with Retention of and Access to Records Policy

Failure to comply with the Policy set forth above may result in disciplinary action up to and including termination of employment.

**IV. EMPLOYEES OF OTHER DISTRICT OF COLUMBIA AGENCIES**

To the extent the foregoing Policy is relevant to employees of District of Columbia agencies over whom the University lacks personnel authority, the University will work in good faith with those employees to effectuate adherence to the Policy.

**V. CONTACTS**

University Office of Sponsored Programs

**VI. COMMITTEES REVIEWING/APPROVING PROCEDURE:**

Sponsored Programs Policy Committee  
Audit, Administration and Governance Committee of the Board of Trustees  
Board of Trustees of the University of the District of Columbia

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**HISTORY/REVISION DATES**

**Last Amended Date: July 10, 2014**

**Next Review Date:**