

#### **Sponsored Awards Record Retention**

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#### Purpose & Scope:

To ensure that necessary records and documents related to sponsored awards are adequately protected and maintained for required retention periods in compliance with state and federal regulations and sponsor requirements. Additionally, to ensure that records that are no longer needed or are of no value are properly destroyed and at the appropriate time. This policy covers §200.334 - 200.338 of Uniform Guidance.

This policy applies to all OSP staff, Principal Investigators (PIs), Project Directors (PDs), and any staff administering, using, or authorizing the use of federal funds. This also applies to all records, regardless of format, whether they be paper, electronic, or microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), and other more traditional media. This policy applies except when prohibited by university policy or by federal or state law.

## Record Retention Requirements for Records Pertinent to Federal Awards

All records (financial, supporting documents, statistical records, etc.) pertaining to a federal award will be retained for **six (6) years** from the date that all terms and conditions are met under the award. For awards that are renewed quarterly or annually, all records will be retained for the same amount of time, but from the date quarterly or annual reports are submitted to the awarding agency or pass-through agency (when applicable).

## Collection, Transmission, and Storage of Records Pertinent to Federal Awards Methods

Whenever practical, the University will collect, transmit, and store federal award-related information in open and machine-readable formats. Records will be converted and kept in an electronic format if possible. Electronic media used to store such records must be subject to periodic quality control reviews and provide reasonable safeguards against alteration.

Colorado Mesa University's efforts to maintain records in accordance with the regulations is a shared responsibility between OSP and the PI/PD. Below is a breakdown of these duties.

#### Office of Sponsored Programs

A Grant or Project File is created upon award notification and stored electronically via secure servers. This includes all pertinent information to the award, such as the Notice of Award (NOA), approved proposal and budget, the executed agreement, copies of financial and technical reports, source documentation, etc. All additional documentation or reports created throughout the life of the award will be stored in the file, which includes closeout documentation.

# Principal Investigators and Project Directors (PI/PDs)

PI/PDs are responsible for maintaining copies of their scientific or technical reports, research records (lab notes, data, etc.), programmatic files, compliance documentation (IRB approvals, EHSA approvals, etc.), and back up justification documentation for expenses billed to the grant(s). They are tasked with notifying OSP when technical, scientific, or deliverables to funding agencies are submitted and providing OSP with a copy of the report(s). This information is stored for the aforementioned six (6) years or as long as the sponsor requires, whichever is longer.



Should a PI/PD leave the University prior to the end of the retention period, they must forward legally compliant copies of program files to OSP during the PI/PD transfer process.

## **Access to Records Pertinent to Federal Awards**

Upon request, the University will provide any authorized entities, departments, and individuals as deemed by the sponsor timely access to any documents, reports, or other records applicable to the sponsored award. Access to appropriate University personnel for interview and discussion is also included under this policy. This aligns with Uniform Guidance <a href="2 CFR \sigma 200.337">2 CFR \sigma 200.337</a> and serves to comply with any audits or examinations conducted by the sponsor.