



## **Document Management Policy**

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**Revised: May 2017**

**On December 26, 2014, the federal government implemented new guidelines for the management of grants, referred to as the Uniform Guidance (2 CFR §200), that replaced OMB Circulars A-21, A-110 and A-133. Awards issued prior to this date will continue to be managed under OMB Circulars. This document is applicable to grants awarded after December 26, 2014 and references the Uniform Guidance.**

### **DESCRIPTION**

This document outlines the policy governing the retention and destruction of records maintained by the Office of Research and Sponsored Programs (ORSP), with references to related policies in Fiscal Affairs and Human Resources regarding their management of contract and grant related records. ORSP adheres to federal regulations regarding retention and access requirements for records. ORSP retains documents for three (3) years (effective 90 days from the date of submission of the final expenditure report), unless the award terms and conditions specify a different period.

### **POLICY**

#### **Office of Research and Sponsored Programs**

#### **Fiscal Affairs**

Fiscal Affairs is responsible for maintaining official University records related to financial transactions for sponsored projects. Records for a given sponsored project may include budget information, financial reports, invoices, copies of checks, Procurement card receipts/reports, reimbursement records (including travel and hospitality), and other miscellaneous financial information related to the sponsored project. For more information, refer to <http://www.calstate.edu/recordsretention>.

#### **Human Resources**

Human Resources is responsible for maintaining personnel and payroll records for individuals hired to work on sponsored projects, as well as all appointment information relating to sponsored projects.

#### **Principal Investigators**

Faculty/Pis are responsible for maintaining documents related to their research. This may include financial and administrative records, documentation involving their research methods, and progress / performance / technical / Intellectual Property (IP) / etc. reports required by the sponsor for their sponsored project(s). They are responsible for notifying campus officials (ORSP, their College Dean and/or other administrative official(s)) when they submit reports or deliverables to a sponsor.

## ORSP

ORSP will maintain original documentation for proposal submissions, subrecipient and vendor contracts, time and effort certification, subrecipient monitoring, financial conflict of interest, responsible conduct of research, and cost share monitoring.

### Grant and Contract Project Files

- A Pre Award file is created upon receipt of a PI Checklist (submitted by the PI via an online form) to collect some of the records related to a given proposal submission. This file includes a copy of the PI Checklist and a copy of the funding announcement (if available). If applicable, the file folder will also contain a *Notice of Cost Sharing/Matching Contribution* form and documentation related to any Subrecipients named in the proposal. Proposal-related documents are saved electronically, although GAs may also choose to print copies for the Pre Award file folder.
- Once an award/contract is issued, an ORSP project is setup and a Post Award project file is created, beginning with the proposal budget, the award/contract notice, and the *Budget Request form* (to setup the project's budget). ORSP project files contain a range of documents, which will vary per project folder based upon the administrative needs of the specific award/contract.
  - A. Unless an agency specifically requires that award/contract records be kept for a longer period of time, ORSP maintains a set of documents for three years following the submission of the final financial/expenditure report. After three years, records are removed and processed for destruction.

### Human and Animal Protections (HAP)

HAP records include copies of all research protocols and approved informed consents, adverse reaction reports and documentation of IRB review, reports of adverse events, serious unanticipated problems, non-compliance issues, suspension or termination of IRB approval, protocol violations, and protocol deviations if serious and/or continuing or deliberate. These records shall be retained for at least three years after completion of the research.

The following timeline for document retention and purging applies to all records maintained by ORSP:

Type of record	Document filing and destruction
HAP files	<ul style="list-style-type: none"><li>- Retained for 3 years after completion of research</li><li>- Files are then purged, according to current procedures</li></ul>
Grant & contract files	<ul style="list-style-type: none"><li>- Files are kept for 3 years following the submission of the final financial/expenditure report, according to current procedures</li></ul>

## RELATED DOCUMENTS

[Code of Federal Regulations Title 2 Subtitle A Chapter II Part 200](#)