

Lewis & Clark College
Grants Records Retention Guidelines
April 2016

Documents and records relating to proposals and sponsored projects must be retained according to sponsor and Lewis & Clark College guidelines. During the course of proposal development and the life of a grant or sponsored project, a variety of documents are generated including formal proposals, email communications, invoices, purchase orders, financial and technical reports, and lab notebooks. Due to the variety and range of records generated during the sponsored award life cycle, records retention and maintenance at Lewis & Clark is a shared responsibility including but not limited to Principal Investigators (PIs), grants offices (Sponsored Research and Corporate and Foundation Relations), the Business Office, and Human Resources. The following guidance is intended to clarify the requirements and roles and responsibilities for retaining records on externally sponsored projects at Lewis & Clark College.

Retention Period

As per the College's Records Retention Policy, Lewis & Clark will retain records pertinent to federal grants for a period of three years from submission of the final project and expenditure reports, and records pertinent to private grants for a period of six years from submission of the final project and expenditure reports. Two exceptions exist regarding retention of records pertinent to federal grants:

- If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.
- If an awarding agency has made special arrangements for a Contractor to transfer to the awarding agency any records that are continuously needed for joint use (to avoid duplicate recordkeeping), the three-year requirement is not applicable to the Contractor.

Types of Grant-Related Records and their Custodians

Grant records may include research data, materials, documents, and information that relate to the administrative, financial, human resource management, reporting of research results, sponsored award applications, cost or pricing, or other management information that has been gathered or used in research activity. Duplicate Records may be held.

Grants Office (CAS Sponsored Research or Corporate and Foundation Relations) -

The submitting grants office is the official custodian of the non-financial grant related records, including non-funded proposals. Non-Financial Grant Records to be retained by Grants Offices include Final Proposals and related correspondence, including notice of award or declination (both funded and not). Post-award documentation may include project summaries, grant authorizations, contract documents; project budget change and adjustment forms; vendor telephone contact logs; subcontracts or sub-award agreements; grants and contracts monthly budget summary statements; patent/invention reports; related documentation and correspondence; FCOI disclosures; grant change request form; no cost extension; final programmatic reports. A retention schedule, which includes a list of all external awards and the date those records may be destroyed, will be maintained by each grants office; each grants office is responsible for maintaining their list based on proposals submitted by that office.

Principal Investigators (PIs) –

PIs are responsible for the overall fiscal and technical administration of their sponsored projects and have obligations to record, maintain, and retain research data and related records. Non-Financial Grant Records to be retained by Principal Investigator include technical/scientific/research records. Documentation of research activity associated with the grant. May include scientific and technical research data, working papers, research/activity reports, summary reports, and related documentation and correspondence; research data; progress reports; and publications.

The Business Office -

The Business Office is the official custodian of all financial records related to the establishment and administration of individually sponsored grant and contract restricted funds and accounts. These records document compliance with fiscal reporting requirements and include related documentation and correspondence. Financial records may also include billing information for accounts receivable from sponsoring agencies and departments; expenditure data; invoices; receipts; accounts payable and purchasing records, including p-cards; purchase orders; prior approval request forms; account request forms; vendor telephone contact logs; subcontracts; SF272 reports for grants and contracts that are operating on direct payments; final financial reports; property reports; contractor's release reports; assignment of refunds and rebates; equipment disposition reports; records for income transactions; real property and equipment; indirect cost rate proposals; cost allocation plans; cost transfer documentation; program income reports; vendor contracts; written price or rate quotations; procurement records; sole source form and documentation; sealed bids; competitive proposals; requisition forms; vendor invoice; independent contractor W-9 form; expense reports; participant list – funds received; capital equipment inventory; and audited financials of sub-awardees or subcontractors; reimbursement requests

General Counsel –

Non-financial records to be retained by General Counsel include patent applications and related documentation, and invention disclosure forms.

Human Resources (HR) –

HR maintains all personnel records and effort certification records. Records to be retained by Human Resources include but are not limited to time and effort reports, payroll timesheets, job descriptions, position description questionnaires, personnel action forms and training records.