



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ACADEMIC SENATE POLICY

Policy on RSP Records Retention

Policy #: SP 13-14

Drafted By: Research and Sponsored Programs

Approval Date: 04/29/14

Effective Date: Fall 2014

Purpose: This document outlines the policy and procedures governing the retention and disposition of records related to grants and sponsored programs conducted under the auspices of CSU Channel Islands and its auxiliaries. This makes reference to existing federal and CSU guidelines as well as CI's fiscal records policy. This policy identifies records responsibilities of the following units: Research and Sponsored Programs Office (RSP), Business and Financial Affairs/Financial Services, principal investigators, and Staff assigned to assist PIs with sponsored projects (subsequently referred to as "Staff").

RSP follows regulations contained in OMB Circular A-110 Subpart C-53 pertaining to the retention and access requirements for records associated with grants and sponsored programs. Following the project closeout process, RSP and others identified herein are responsible for records retention of documents for three years from the date of submission of the final expenditure report, unless the award terms and granting agency specify an extended period.

Background:

This policy is required by CSU Executive Order No. 890, Article 3.6.2. This policy applies to RSP and specifies other custodians with responsibility for maintaining records pertaining to sponsored programs at CSU Channel Islands. The policy specifies the period of time and indicates who is responsible for each type of record. The policy includes the role of PI's in maintaining scientific and technical reports, and notifying RSP when they submit those reports to funding agencies.

Accountability:

Research and Sponsored Programs
Business and Financial Affairs/Financial Services
Principal Investigators & Staff
CI Foundation

Applicability:

RSP/CI Foundation and other administrative units that have responsibility for externally sponsored financial and contractual obligations.

Faculty and staff who have post-award responsibility for grants and sponsored programs.



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Definitions:

Custodian: The designated unit that maintains the official/original copy of the record/information.

Disposition: A range of processes associated with record/information retention, destruction, and transfer decisions that are documented in this records retention policy.

Staff: A staff member (regular or temporary) who is assigned to assist the PI with post-award administration of a grant or sponsored program.

PI: Principal investigator. The PI is the CI faculty or staff member who is awarded the grant or sponsored program.

Project (or award): Grant or sponsored award, identified by number, funded by an agency external to the university.

Record/Information: Every means of communication or representation related to a grant or sponsored program to include physical and electronic documents or other means to engage in business, regardless of media.

Retention Period: The period of time that a record is kept. This may be divided into active retention period (post award) and inactive retention period (following PI submission of final financial report).

Record Value: The worth, merit, or importance of a record or information pertaining to one or more of the following areas (based on the CSU Records Retention Policy):

- **Operational:** required by a campus or unit to perform its primary function.
- **Legal:** required to be kept by law, litigation, or government investigation.
- **Fiscal:** related to the financial transactions of a campus, especially those required for audit or tax purposes.
- **Historical:** of long-term value to document past events. This may arise from exceptional age and/or connection with some significant historical event or person associated with the CSU and/or CI.
- **Vital:** critical to maintain to ensure operational continuity for the CSU and/or CI after a disruption or disaster. Vital records or information may fall into any one of the above value categories.



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Policy:

RSP Records Retention and Disposition

California State University Channel Islands (CI) Research & Sponsored Programs (RSP) records retention is distributed by function among the various offices involved in managing sponsored programs. Below is a breakdown of records retention by office.

Research & Sponsored Programs (Project File):

- Project file created immediately upon award notification includes a copy of the Letter of Award, approved proposal & budget, executed contract/agreement or other official notification, and pre-award institutional approvals/certifications/assurances for the application submitted to the funding agency.
- RSP maintains the Project file in the RSP office for the life of the project which includes additional documents such as: the any contractual modifications/amendments, budget revisions, PI meeting checklist, and other important non-financial compliance documentation. This documentation is retained for a minimum of three years following the submission of the final report, or as long as required by the sponsor.
- Following the closing of a contract or grant, files are transferred to the RSP storage area where they are stored for a minimum period of three years. Files may be kept for a longer period of time when required by the sponsor (for example, non-governmental sponsors typical require documentation to be kept for a period of 7 years following project closure). After three years (or after sponsor-specified timeframe), records are removed and processed for destruction.

CI Foundation (Program File):

- Responsible for maintaining records in accordance with the CI records retention schedule and policy for any CI Foundation sponsored program records.
- Responsible for passing on all documentation (incoming and outgoing) to stateside departments and for ensuring retention of relevant pre-award and post-award non-financial documents.

Business and Financial Affairs/Financial Services (Financial File):

- Copies of all grant-related financial reports are retained by Financial Services for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.
- Financial supporting documentation received for expenses billed to grants are retained for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.
- Copies of all signed grant effort reports and cost match documentation are held for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.



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- Grant close out documentation is maintained by Financial Services held for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.

Departmental Level (Program File):

Principal Investigators/Faculty:

- PI's are responsible for maintaining copies of their scientific or technical reports, research records (lab notes, data, etc.) and are responsible for notifying campus officials when they submit their reports or deliverable to funding agencies.
- PI's must notify RSP when they submit technical or scientific reports to funding agencies, and must provide RSP with a copy of the report.
- PI's are responsible for maintaining all programmatic files, specific compliance documentation (i.e. IRB approvals, Environmental Health & Safety Approvals, etc.), and back-up justification documentation for expenses billed to grants for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.
- If a PI leaves the university prior to the end of the retention period, disposition of the PIs grant records will be decided during the PI transfer process.

Assigned Project Staff (Program File):

- Back-up justification documentation received for expenses billed to grants are retained by the PIs academic program area or department for a minimum period of three years following the submission of the final report, or as long as required by the sponsor.
- For sponsored projects that have a temporary Staff position funded by the grant: All documentation of expenses billed to grants will be transferred to the departmental level (for research grants) or home AVPs office (for institutional grants or multi-departmental grants) upon closure of the grant.



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The following dispositions apply to all grants and contract records:

	Type of record	Filing and disposition
1	Grant & Contract active award files	Maintained in RSP (and/or CI Foundation when appropriate) for the entire performance period of the project.
2	Grant & Contract closed project files	Kept in RSP (and/or CI Foundation when appropriate) storage for three years from the date of closing (or longer if required by sponsor).
3	Grant & Contract financial reports	Maintained in Financial Services for three years from the date of closing (or longer if required by sponsor).
4	Grant & Contract expense back-up and justification documentation	Maintained by the PI and assigned project Staff for three years from the date of closing (or longer if required by sponsor). If the assigned Staff position is temporary, then files are transferred to the Department or the home AVP's office upon closure of the grant.
5	Grant & Contract research documentation (lab notes, data records, etc.), scientific & technical reports.	Maintained by the PI in Departmental files.
5	Contract and Grant closed project files after three years from the date the final expenditure report is delivered (unless otherwise required by the sponsor).	Destroyed following administrative guidelines for disposition of administrative records after the date of the final expenditure report is delivered.

Institutional Review Board (IRB)

IRB 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.

IRB records shall be retained for at least three years after completion of the research (or longer if required by sponsor). Copies of IRB approvals should be retained a) by the PI, b) in the grant award file, and c) in the IRB files.



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Procedures for Research and Sponsored Programs Records Retention and Destruction

These procedures are outlined in a separate document, included in the Reference section below.

Disposition Schedule by Record Title

Disposition schedule and custodian by type of record for grants and sponsored programs is attached.

EXHIBIT(S):

- OMB Circular A-110
- CSU Executive Order 1031
- CSU Executive Order 890
- CI RSP Records Retention Schedule
- Procedures for CI RSP Records Retention and Destruction