



Policy # 81004

Retention of Sponsored Awards Records

Effective Date: September 1, 2023

Responsible Office: Sponsored Programs

Division: Research and Sponsored Programs

I. PURPOSE/OBJECTIVE

This document outlines the policy and procedures governing the retention and disposition of records related to grants and other sponsored agreements (including sub-awards) carried out under the auspices of GSU and any of its academic or administrative departments and units. The purpose of this policy is to set forth the requirements and procedures for retaining and destroying financial and other documents from sponsored agreements in accordance with GSU, federal, and other sponsor guidelines

II. APPLICABILITY

This policy is applicable to all schools, departments, units and personnel of the University involved in managing and administering sponsored awards including: Research and Sponsored Programs (RSP), Business and Financial Affairs/Financial Services, principal investigators, and staff assigned to assist PIs with sponsored projects.

III. STATEMENT OF POLICY

Grambling State University's (GSU) policies regarding records retention are in accordance with university and federal guidelines. Records originating from or pertaining to federally sponsored awards are to be managed in accordance with [Uniform Guidance 2CFR 200.334](#).

IV. RETENTION REQUIREMENTS FOR RECORDS

§ 200.334 Retention requirements for records.

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

- a. If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

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- b. When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
 - c. Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
 - d. When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.
 - e. Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
 - f. Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: Indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 1. *If submitted for negotiation.* If the proposal, plan, or other computation is required to be submitted to the Federal Government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.
 2. *If not submitted for negotiation.* If the proposal, plan, or other computation is not required to be submitted to the Federal Government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, **plan, or other computation.**

V. REVISION/REVIEWED