

Record Retention and Destruction Policy

Revised: May 2018

PURPOSE

The purpose of this policy is to establish procedures for the disposal of grants and contracts records containing information of a proprietary, confidential, or highly sensitive nature and ensure that these records are adequately protected and properly maintained and retained for a period of three years after the grants closure, unless a longer period is mandated by the funding agency. The established procedures will also strengthen safeguards against the unauthorized or accidental disclosure of confidential records and information.

This Policy also contains Records/Information Retention and Disposition Schedule in accordance with Uniform Guidance 2 CFR 200.33 and the Integrated CSU Administrative Manual (ICSUAM) policy 11002.07 and herein incorporated as an Attachment Appendix "A".

Exception for Grants and Contracts Records

If any litigation, claim or audit is started before the expiration of the three-year period, records must be maintained until all litigation, claims and findings have been resolved and final action taken. The Grant Administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

ADMINISTRATION

Attached as Appendix A is a Record Retention Schedule that sets forth the length of time records are recommended to be retained. The schedule is intended to cover all Grants and Contracts records for which there is a legal, regulatory or management retention requirement. Similarly, records that are duplicates should be disposed of as early as practicable, unless the retention schedule requires otherwise. The Office of Sponsored Research and Programs shall be in charge of the administration of this Policy pertaining to Grants and Contracts Records and the implementation of processes and procedures to ensure that the Record Retention Schedule "A" is followed. The Foundation Executive Director shall at the same time be in charge of the administration of all payroll/personnel records and fiscal records.

The Director of Office of Sponsored Research and Programs is authorized to make modifications to the Record Retention schedule from time to time to ensure that it is in compliance with local, state and federal laws affecting record retention.

DESTRUCTION AND AUTHORIZATION

The destruction and disposition of records is handled by the Analyst after notifying the Director of the Office of Sponsored Research and Programs.

SAFE AND SECURE DISPOSAL

Disposal of confidential records shall be in a manner or methods that will not permit recovery, reconstruction and future use of confidential information. An overview of these methods follows below.

Paper Records containing confidential information should be shredded and/or pulped, not simply thrown out with other classes of records or with miscellaneous trash. It is recommended that confidential destruction services, including shredding and pulping, be arranged through the university records department if available. Otherwise, the same shall be assigned to authorized OSRP staff.

Digital or Electronic Records Disposition of records created, retained, or stored in information systems or computers should proceed on the same bases as traditional records. Digital or electronic records for which there is no retention requirement, such as e-mail, should be deleted promptly.

Electronic or Machine-Readable Records containing confidential information requires a two-step process for assured, confidential destruction. Deletion of the contents of digital files and emptying of the desktop “trash” is the first step. Commercially available software applications must be utilized to remove all data stored on a “hard drive” to prevent reconstruction of any data previously stored. Floppy disks and back-up tapes must be physically destroyed, not simply thrown away.

Confidential Destruction by Commercial or Non-Profit Vendor

Confidential destruction may also be performed by approved commercial or non-profit vendors subject to the approval of the Director of the Office of Sponsored Programs.

DESTRUCTION RECORD

A destruction record is an inventory describing and documenting those records, in all formats, authorized for destruction, as well as the date, agent, and method of destruction. The destruction record itself shall not contain confidential information. It is anticipated that in most cases two copies of the destruction record shall be retained: one in the Grants and Contracts Office and one in the Director of Business and Finance Office. The destruction record may be retained in paper, electronic, or other formats.

Appendix A—Record Retention Schedule

RECORD CATEGORY	RETENTION SCHEDULE
<u>Grant Records</u>	
Original grant proposal	3 years after completion of grant period **
Grant Agreement, contracts and Subsequent modifications	3 years after completion of grant period
Final grantee reports, both financial and narrative.	3 years after completion of grant period
All pertinent formal correspondence relating to the grant.	3 years after completion of grant period

**"Completion of grant period" refers to the period after the final close out of the grant and after all final documents have been submitted and accepted. These submitted documents include Financial Status Report, Final Narrative Report, Invention Report and Property Reports, if any.