



## Office of Sponsored Research

### Records Retention for Sponsored Programs

#### 1. Overview

As a recipient of sponsored funds, Phronetik is responsible for ensuring that records of sponsored programs are maintained in compliance with institutional, state, federal, and sponsor regulations, including Uniform Guidance (2 CFR 200.333). The Financial Services (FS) team, Principal Investigators (PIs), department personnel, and Office of Sponsored Research (OSR) work collaboratively to meet these requirements. When an award is accepted or set up, OSR informs relevant parties, including PIs and FS, of any record retention periods that exceed Phronetik's standard three-year requirement.

#### 2. Purpose

This document provides guidance on maintaining appropriate records for sponsored programs and supplements any other guidance provided by Phronetik's Office of Research Administration (ORA).

#### 3. Who Must Comply

This policy applies to:

- Department Personnel
- Financial Services (FS)
- Principal Investigators (PIs)
- Office of Sponsored Research (OSR)

#### 4. Definitions

- **Record Retention Period:** The time during which records of Phronetik's business activities must be maintained to ensure compliance with institutional, state, federal, and sponsor regulations.
- **Record Retention and Disposal Schedule:** A list of official records for each major administrative department, prescribing the retention periods and disposal methods.
- **Office of Record:** The designated division or department responsible for retaining and disposing of Phronetik's records in accordance with policy.

#### 5. Procedure

Phronetik adheres to all regulations concerning record retention for sponsored programs. Generally, records are retained for three years after submitting the final financial report. However, records may be retained for longer if:

- Sponsor regulations specify a retention period longer than three years.
- The sponsor's terms and conditions dictate a longer retention period.
- A sponsor formally requests an extended retention period.
- Legal action, claims, or audits arise before the end of the three-year period; in such cases, records are retained until all actions are resolved.



Additional guidelines for specific sponsored program activities include:

- **Capital Equipment:** Retain records for three years following the final disposition date.
- **State Specific Sponsored Programs:** Retention periods vary by document type. Refer to specific program terms for guidance.
- **Program Income Activities:** Retain records for three years after the fiscal year in which income was earned.
- **F&A Proposals and Cost Allocations (Federal):** Retain records for three years after acceptance.
- **F&A Proposals and Cost Allocations (Non-Federal):** Retain for three years after the fiscal year in which they were used.

To ensure compliance, PIs and department personnel are responsible for maintaining appropriate records that supplement pre-award records from OSR and post-award records from FS.

### Disposal

Once the retention period is complete, records are promptly destroyed. Clinical trials and programs involving human subjects follow Health Insurance Portability and Accountability Act (HIPAA) guidelines, requiring that paper documents containing protected health information (PHI) be destroyed through pulping, shredding, or incineration. Electronic records are cleared, purged, or destroyed by methods such as disintegration, pulverization, or shredding.

## 6. Responsibilities

- **Department Personnel**
  - Maintain documentation of sponsored program activities for the retention period.
  - Promptly destroy records after the retention period concludes.
- **Financial Services (FS)**
  - Retain documentation for the required retention period.
  - Provide guidance to PIs and department personnel on record retention and destruction.
  - Promptly destroy records after the retention period concludes.
- **Principal Investigators (PIs)**
  - Familiarize themselves with sponsor and federal requirements for record retention and disposal.
  - Maintain documentation for the required retention period.
  - Destroy records promptly once the retention period ends.
- **Office of Sponsored Research (OSR)**
  - Retain documentation of program activities for the retention period.
  - Ensure prompt destruction of records once the retention period is complete.

By following these protocols, Phronetik upholds compliance in records retention, reducing risks of non-compliance while protecting future funding opportunities.