

Record Retention for Sponsored Programs

1. Overview

As the recipient of sponsored funds, the University is responsible for ensuring that sponsored program records are maintained in compliance with funder, University, State and Federal regulations. This includes but is not limited to Uniform Guidance (2 CFR 200.333) and Rutgers Record Management Policy (30.4.5).

Research Financial Services (RFS), Principal Investigators (PIs), department personnel, Research and Sponsored Projects (RSP) and other stakeholders collaborate to maintain compliant sponsored program records. At the time of award acceptance and/or setup, RSP notifies the PI, department personnel, RFS and any other relevant parties of any record retention periods that exceed Rutgers' standard three-year requirement.

2. Purpose

Provide guidance to the University on maintaining appropriate sponsored program records. This document supplements the guidance issued by Rutgers Institutional Planning and Operations (IPO) on this topic.

3. Who Must Comply

Department Personnel
Research Financial Services
Principal Investigators
Research and Sponsored Programs

4. Definitions

Record Retention Period: The period of time for which records of University business must be maintained to ensure compliance with University, State, Federal and sponsor regulations and requirements.

Record Retention and Disposal Schedule: A list of official records for each major administrative department in the University that prescribes the periods of authorized retention and how the record is to be disposed of after the required retention period.

Office of Record: The designated division, department, unit or individual, as identified in the Records Retention Schedule, responsible for both the retention and timely destruction of University records in accordance with this policy

5. Procedure

As outlined in Rutgers Record Management Policy (30.4.5), the University adheres to all applicable regulations related to sponsored program record retention. Rutgers retains all sponsored program records for a period of three (3) years after filing the final financial report. Rutgers may extend the record retention period if required to do so by any of the following:

- Sponsor regulations require a record retention period of greater than three (3) years

- Sponsored program terms and conditions require a record retention period of greater than three (3) years
- Sponsor directs Rutgers in writing to apply a record retention period of greater than three (3) years
- If a legal action, claim or audit is initiated prior to the end of the three (3) year retention period, then Rutgers will retain all records until the actions is fully resolved.

In addition to record retention for standard sponsored program activities, PIs and departments shall familiarize themselves with sponsor mandated record retention policies, specifically, what types of documentation need to be retained, for how long, and guidance on how and when they should be destroyed. They should also keep the following in mind:

- **Capital equipment purchased with sponsored funding:** The record retention period is three (3) years after the final disposition date.
- **Sponsored program activities funded by the State of New Jersey:** The record retention period for State-sponsored programs varies by document type. Staff should refer to the sponsored program terms and conditions to identify the applicable retention period.
- **Program Income Activities:** if program income is earned after award period, the record retention period is three (3) years after the end of the fiscal year in which the income was earned.
- **F&A Proposals and Cost Allocations submitted to the Federal government:** The record retention period is three (3) years after the date of acceptance.
- **F&A Proposals and Cost Allocations not submitted to the Federal government:** The record retention period is three (3) years after the end of the fiscal year in which the costing allocation was used.

To ensure that the University meets its requirements related to records retention, PIs and department personnel will maintain appropriate programmatic and activity records that supplement RSP's pre-award records and RFS' post-award and financial records.

Disposal

The University will promptly destroy sponsored program records once the retention period is complete.

Clinical trials and other sponsored programs with human subjects shall adhere to Health Insurance Portability and Accountability Act (HIPAA) requirement that all paper documents containing protected health information (PHI) be destroyed by pulping, shredding, or incineration. Electronic documents shall be cleared, purged, or destroyed by disintegration, pulverization, melting, incinerating, or shredding of the actual media.

6. Responsibilities

Department Personnel	<ul style="list-style-type: none"> • Maintain appropriate documentation of sponsored program activities for the record retention period • Promptly destroy records once the record retention period is complete
Research Financial Services Accountant	<ul style="list-style-type: none"> • Maintain appropriate documentation of sponsored program activities for the record retention period • Promptly destroy records once the record retention period is complete • Provide guidance to PIs, department personnel and other University stakeholders regarding adhering to record retention requirements related to sponsored programs

Principal Investigators	<ul style="list-style-type: none">• Understand sponsor and federal record retention and disposal requirements• Maintain appropriate documentation of sponsored program activities for the record retention period• Promptly destroy records once the record retention period is complete
Research and Sponsored Programs	<ul style="list-style-type: none">• Maintain appropriate documentation of sponsored program activities for the record retention period• Promptly destroy records once the record retention period is complete

7. Resources

Related Procedures

Uniform Guidance (2 CFR 200.333)

Rutgers Record Management Policy (30.4.5).