**Lincoln University of Pennsylvania**

UNIVERSITY GRANTS AND CONTRACT POLICIES

Title: Record Retention Policy

Effective Date: June 04, 2020

Supersedes: N/A

Issuing Authority: Office of Research and Sponsored Programs

Responsible Officer: Vice President for Finance & Administration

Policy

It is the policy of Lincoln University (“the University”) that all grant-related records and supporting documentation for Federal awards are retained in accordance with the Federal Office of Budget and Management Uniform Guidance **(**[**OMB Uniform Guidance**](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) **2 CFR 200)** unless a longer duration is required by the sponsor. For all other awards, records should be retained in accordance with sponsor requirements.

**Purpose of this Policy**

The purpose of this policy is to set forth the requirements for record retention and destruction of sponsored award records in accordance with Lincoln University, Federal and sponsor terms and conditions.

**Scope of this Policy**

This policy is applicable to all colleges, departments, units and personnel of the University involved in managing and administering sponsored awards.

**Procedures of Implementation**

Departments are responsible to ensure that personnel who handle records are aware of the record retention policy and that supervisors are overseeing compliance with the policy requirements. Copies of original records, either in paper or in computer or electronic format, may be substituted for the original records.

For Federal awards, financial records, supporting documents, statistical records and all other records pertinent to an award shall be retained for **three (3) years** from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as prescribed by the sponsor. The only exceptions are the following:

* If any litigation, claim, or audit is started before the expiration of the three-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
* Records for real property and equipment acquired with Federal funds shall be retained for three years after final disposition.
* When records are transferred to or maintained by a Federal sponsor, the three-year retention requirement is not applicable for Lincoln University.
* Indirect cost rate proposals:
  + If submitted for negotiation, the three-year retention period for its supporting records starts on the date of such submission.
  + If not submitted for negotiation, the three-year retention period starts at the end of the fiscal year (or other accounting period) covered by the proposal.

For non-Federal sponsors, retention requirements will vary with the sponsor. The grant award should specify the specific timeframe.

**Sponsor Rights to Access Documentation and/or Interview Personnel**

The Sponsor and other government entities have the right of timely and unrestricted access to any records of Lincoln University that are pertinent to the awards, for the purpose of audits and examinations. This right also includes timely and reasonable access to University personnel for the purpose of interview and discussion related to such documents. In order to avoid disallowance of expenses against grants and contracts, proper financial records must be maintained for compliance and audit purposes. The financial records of each department must be maintained in accordance with OMB Uniform Guidance requirements, unless a longer duration is required by the Sponsor. If no retention period is indicated in the award document, documentation should be retained for three years after the final financial report is submitted to the sponsor.

**Departmental Responsibilities**

Departments must maintain any documentation, including emails, to support charges to a sponsored project that were not previously submitted through University administrative process and/or systems. All Departments must retain documentation for purchases irrespective of the procedures outlined for all other sources. Documents may be imaged provided information is legible and not missing any pages.