

# Grant/Contract Records

Exactly How Long Do I Keep Them?

Records Management Services  
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# ***IN THE BEGINNING.....***

## ***WHAT IS A RECORDS RETENTION PERIOD?***

A records retention period tells you how long to keep records before they can be destroyed.

## ***WHO DETERMINES THE RETENTION PERIOD?***

Retention periods are based on state, federal, and private sponsor requirements. These requirements are identified by the UW Records Management Office and approved by the State Records Committee.



# ***WHAT DOES A RETENTION PERIOD LOOK LIKE?***

***A retention period is comprised of 2 parts:***

- The cut-off
- The retention number

ex: 6 years after submission of financial status report

ex: 3 years after final termination of grant/contract

# FINANCIAL RECORDS



# ***G/C FINANCIAL RECORDS***

## ***WHAT DOES “SUBMISSION OF FINANCIAL STATUS REPORT” MEAN?***

A financial status report is submitted as specified by your sponsor, typically annually, but always at the end of a funding period.

You can find information on when this report was submitted in Grant Tracker.



# ***SPONSORED BUDGETS***

## ***ARE FINANCIAL REPORTS SUBMITTED EVERY YEAR?***

1. Reporting frequency is specified in each award document. There are some awards that require financial reports that extend beyond a year.
2. You always must plan to retain appropriate supporting documentation within your department that fulfills the needs for that award.
3. In cases when financial reports extend beyond a year, for records that are found on MyFD and in Ariba, you must retain your own copies (paper or digital) of the reports and supporting documentation.
4. If award requirements are not met, departments need to be prepared to assume the risk of not being able to provide the documentation should it be requested.



## **Billing Source Documents for Grants/Contracts:**

Documentation used by UW Recharge/Cost/Service Centers to prepare Cost Transfer Invoices (CTIs), Internal Sales Documents (ISDs), recharge documents, journal vouchers, or invoices for the purpose of charging other budgets or non-UW entities for services or supplies. May describe in greater detail than billing document the service or supplies provided. May include work orders, service requests, logs of goods/services provided, etc.

Official Copy: Any Issuing Office

Retention: **6 years submission of financial status report**

Disposition Method: Recycle

Other Copy: Any Receiving Office

Retention: **3 years after submission of financial status report**

Disposition Method: Recycle

# 3 YEARS AFTER SUBMISSION OF FINANCIAL STATUS REPORT

**Financial Records for Grants/Contracts:** Records of financial transactions on grants and contracts including non-FEC (Faculty Effort Certification) cost share documentation.

Cash Transmittals	Requests for Authorized Recharges
Cost Transfer Invoices (CTIs)	Requests to Transfer Expenses
Journal Vouchers (JVs)	Requests for Reverse Expenditures
Vendor Invoices	Memo to Request an Advance Notice
Purchase Requisitions	TRANSPASU Form (parent to sub budget)
Travel Records	eProcurement Invoices
ProCard Credit Card <i>Statements</i>	Financial statements and reports of expenditures to sponsoring agencies
<i>Non-ProCard</i> Credit Card Slips	



# ***6 YEARS AFTER SUBMISSION OF FINANCIAL STATUS REPORT***

## **Packing Slips from Outside**

### **Vendors for Grants/Contracts:**

A record of departmental receipt of goods or equipment.

## **Petty Cash (Revolving Fund) Records:**

Records of expenditure from a grant or contract revolving fund. May include Application for Revolving Fund; Petty Cash Vouchers with supporting documents such as sales slips, cash register receipts, paid invoices; Receipt for Petty Cash Advance; bank records such as deposit tickets, cancelled checks, statements, reconciliations, etc.

## **Purchase Records – Internal:**

Documents departmental approval and receipt of purchases. Includes memos or forms routed within a department for approval of purchases prior to generation of a Purchase Requisition. Applies to ProCard transactions. Includes Delegation of Authority.

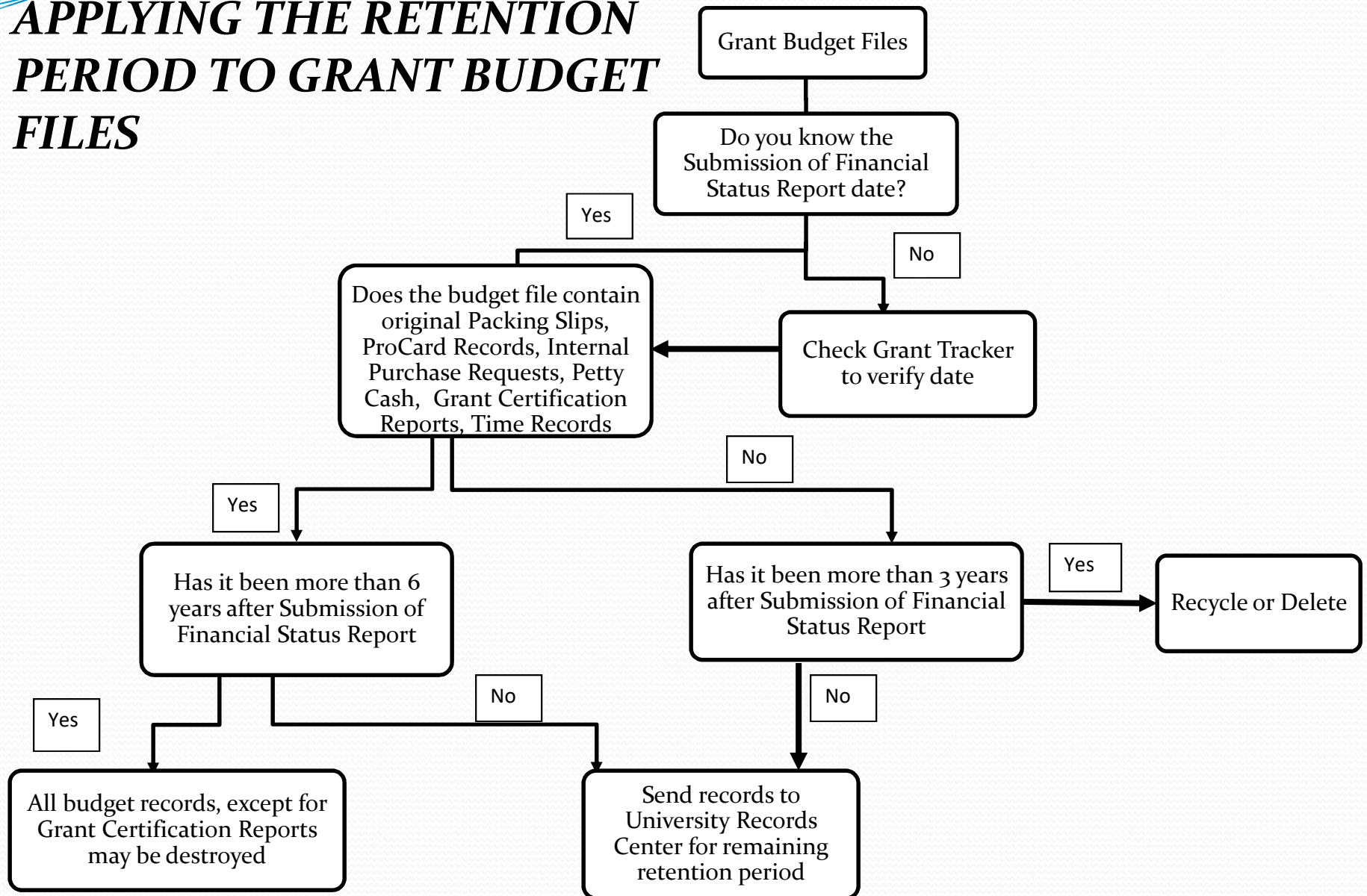
## **ProCard Approvals:**

Provides a record of Procurement Card (ProCard) transaction approval, reconciliation, and receipt of goods or equipment. Includes reviewed and signed Transaction Detail Report, invoices received, and packing slips.

## **Grant Certification Reports:**

Signed report which provides a means of payroll verification for Principal Investigator of a grant or contract.

# APPLYING THE RETENTION PERIOD TO GRANT BUDGET FILES





## FAQ

*So, I have a grant that started in 1962. Don't I have to keep the financial reports from the beginning of the grant?*

Not unless you have never submitted a financial status report to your sponsor. Once the financial status report is submitted, state and federal auditors have a 6 year window of opportunity to audit financial records. If records are not audited by the end of the 6 year period, they can be destroyed.



## **FAQ**

***What happens if I am not required to submit a financial status report to my sponsor until the end of the grant/contract?***

These cases are rare but they do happen. (ex: SNAP grants) In this instance you would keep your records until that report was finally submitted and then start counting down on the retention. We would still use the normal retention period of 3 years or 6 years.

The difference is you don't hit the cut-off until several years pass.



# FAQ

## *ARE THERE ANY EXCEPTIONS?*

Yes, if you are being audited or have received notice of an audit, if there is litigation regarding the records, or if there is a public records request involving the records—they should not be destroyed until the matter is resolved and their retention period has ended.



## **FAQ**

***DOES THIS MEAN THAT I STOP COUNTING THE RETENTION PERIOD WHEN AN AUDIT STARTS AND START UP AGAIN AFTER THE AUDIT ENDS?***

Not exactly. The retention clock keeps ticking through the audit. If it ends when the audit ends, you can destroy the records at that time—unless there was an audit finding.



# ADMINISTRATION RECORDS

## RESEARCH RECORDS



# ***COMMON CUT-OFFS***

## Final Termination of Grant/Contract

- Used for Administrative Records—Awarded
- Includes proposal, award letter/notice
- Includes supplements or amendments
- Includes all renewals

## Close of Study

- Used for Research Records and Consent Forms
- Includes all renewals





# ***RENEWAL AWARDS***

*How does “close of study” or “final termination of grant/contract apply to renewals”?*

Since a renewal is an authorization for follow-up support to a project, for administrative records and research data, the retention period begins *after the final renewal ends*.

Renewals have no impact on financial records.

# ***RESEARCH DATA RETENTIONS***

- Non-Biomedical Treatment or Intervention (Non Drug, Device or Surgical Procedure/Intervention)
  - 6 Years after close of study
- Biomedical Treatment or Intervention (Drug, Device or Surgical Procedure/Intervention)
  - 30 Years after close of study
- Drug Development
  - 30 years after close of study
- Clinical Trials Phase I-IV Research Data
  - 30 years after close of study
- Sponsor Required Contractual Obligation
  - 15 years after close of study
- Exempt from Human Subjects Review
  - 6 years after close of study

# ***CONSENT FORM RETENTION***

**Consent Forms for Research -- Adults:** A record of permission supplied by adult subjects to participate in a research program which falls under the category of **Non-Biomedical Treatment or Intervention.**

Official Copy: Principal Investigator

Retention: **6 years after the close of study**

**Consent Forms for Research -- Minors:** A record of permission granted by parent or guardian for children to participate in a research program which falls under the category of

**Non-Biomedical Treatment or Intervention.**

Official Copy: Principal Investigator

Retention: **10 years after last contact with subject, or 3 years after subject reaches age 18; whichever is longer**

**Consent Forms for Research-- Biomedical Treatment or Intervention** A record of permission supplied by adult subjects or by the parent or guardian of minor subjects to participate in a research program which includes **Biomedical Treatment or Intervention.**

Official Copy: Principal Investigator

Retention: **30 years after close of study**

# ***JURISDICTION***

- There are actually two records management programs which serve the UW community.
  - Records Management Services
  - Hospital Records Management

When dealing with Human Subjects research, because of jurisdiction, we must always begin with a question--When is a patient a study subject?

- Is the study information contained in a Patient Chart?
- How did you recruit study subjects?
  - Advertising
  - Word of mouth
  - Referral by a physician
  - Patient file



# ***ANYTHING NEW?***

- Revised Storage Request Form
  - To help resolve some of the confusion around “submission of financial expenditure report”
  - Now includes a column which asks that question specifically



# FAQ

***BY THE WAY, WHERE DO I FIND THE RETENTION PERIODS FOR ALL MY GRANT/CONTRACT RECORDS?***

Retention periods for all grant/contract records are found in section 07 of the University General Records Retention Schedule. Records are listed in alphabetical order.

<http://f2.washington.edu/fm/recmgt/retentionschedules/gs/general/uwgs7>

**QUESTIONS?**

# Contact Information

- **Barbara Benson** 206.543.7950  
[bbenson@uw.edu](mailto:bbenson@uw.edu)
- **Cara Ball** 206.543.6512  
[ballc2@uw.edu](mailto:ballc2@uw.edu)
- **Andrea Watts** 206.543.0573  
[wattsa@uw.edu](mailto:wattsa@uw.edu)

