University of Denver
Office of Research and Sponsored Programs
Records Retention
(Updated July 1, 2011)

I. PURPOSE

Under the legal terms of awards to the University, sponsors and auditors have the right to access to all official University records associated with a project. The University is obligated to make such records readily available for examination.

II. REQUIREMENTS

Sponsored Program Grants and Contracts:
OMB Circular A-110 outlines specific requirements for record retention practices for Federal award recipients. The Circular outlines that “financial records, supporting documents, statistical records, and all other records pertinent to an award must be retained for a period of three 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 report.

Indirect Cost Proposals:
OMB Circular A-110 – 3 years from proposal submission date

Human Subjects Research:
45 C.F.R – 3 years from the end of the research activity

Animal Research:
Office of Laboratory Animal Welfare (O.L.A.W.) Guide – 3 years from the end of the research activity

III. POLICY

The University and ORSP will establish and maintain a records retention schedule (Attached) that complies with the Federal requirements detailed in the above section. The records retention policy (and schedule) will apply to all sponsors (federal and non-federal).

ORSP and University Departments will establish, maintain and retain records in accordance with the records retention schedule:

ORSP
- Official documentation and records for awarded grants and contracts
- Official documentation and records for institutional review committees
- Research PI conflict of interest disclosures
- Indirect Cost Proposals (including data and calculations)
PI's
- Scientific records and data
- Human and animal subject research data, forms, and materials

Departments
- Personnel and financial records

The appropriate record categories and applicable records are detailed on the Records Retention schedule. This schedule can be found on the ORSP website www.du.edu/orsp and is also included and published on the University master records retention schedule at www.du.edu/bfa/records/.

IV. PROCEDURES

A. RECORD STORAGE

Records are to be maintained and stored so they can be produced completely and efficiently upon requests for examination. When requested, records should be produced and delivered as and when requested, within reason. Records should be categorized and retained according to the “Record Storage” guidelines on the Record Retention schedule. This includes electronic records which are to be stored on the University’s network drive.

B. RETENTION PERIOD AND RULES

1. Records are to be maintained and accessible at minimum as long as the “Retention Period” noted on the schedule.
2. Records past the Retention Period are to be destroyed at least annually according to the “Retention Rules”. ORSP destroy date is annually in December.
3. During award closeout, the ORSP Project Administrator will designate the ORSP destruction date for Banner FRAGRNT record and hard file storage. The destruction date is to be December of the year the “Retention Period” ends. For example: Award end date was January 31, 2006. The destruction date designated by ORSP will be December 2010.
4. By December each year ORSP will produce reports for ORSP personnel and departments noting all files eligible for destruction that year:
   a. Grants/Contracts – awards with destruction date of current year
   b. Committee protocols – all protocols that retention period expired in current year
   c. Rejected proposals – all proposals that retention period expired in current year
5. Departments may establish their own destruction dates as long as records retained full retention period. However, departments are encouraged to follow ORSP annual schedule for consistency and ease of destruction. All records eligible for destruction each December are to be destroyed by June 30 of the following year.
C. RECORD DESTRUCTION

1. When destroying records, all applicable records are to be destroyed. This includes hard copy files, scanned documents retained in Banner, electronic documents and workpapers maintained in network directories.
2. Hard copy files are to be shredded either internally or using outside vendor.
3. Banner scanned documents are to be deleted from Document Extender feature of Banner.
4. Electronic protocols are to be purged from database.
5. Electronic documents and workpapers are to be deleted from the network drive. It is recommended that all documents be electronically filed in a folder as noted on the retention schedule so the entire folder and contents can be easily deleted.

D. APPLICABILITY

This Record Retention policy and procedures apply to all records established, maintained or retained on or after July 1, 2011. Records retained prior to this date that are being retained under previous schedules and procedures may follow their original schedule and procedures as long as retention meets the Federal requirements.