



Document Management Policy and Procedure

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PURPOSE

This document outlines the policy and procedures governing the retention and destruction of records within the Office of Research and Sponsored Programs (ORSP) and makes references to the existing policies in Fiscal Affairs and Committee for the Protection of Human and Animal Subjects with respect to contract and grant financial records. Under this policy, Principal Investigators are responsible for maintaining technical reports and supporting documentation for sponsored projects as well as keeping ORSP and College Deans informed about their records.

ORSP follows regulations contained in OMB Circular A-110 Subpart C-53 pertaining to the retention and access requirements for records. Following the project closeout process, ORSP retains documents for three years effective 90 days from the date of submission of the final expenditure report, unless the award terms and conditions specify a different period.

SCOPE

This policy applies to ORSP as the central administrative unit with responsibility for maintaining records pertaining to sponsored programs at San Francisco State University (SFSU). The policy specifies the period of time and indicates who is responsible for records management. The policy includes the role of PI's in maintaining scientific and technical reports, and notifying the campus when they submit those reports to agencies.

POLICY

ORSP Records Retention and Disposition

Currently, ORSP maintains the following records:

- At the onset of a new project, a Pre-Award file is created immediately upon the PI submitting a Project Checklist. The Pre-Award file includes a copy of the proposal and the approvals for the application to be submitted to the funding agency.
- Once an award is issued, ORSP creates a Post-Award file based on the Letter of Award, an executed contract, or other official notification.
- For the duration of an award, ORSP maintains the entire set of documents for three years following the termination of the project. Files are available to ORSP staff in the ORSP office.
- Following the closing of a contract or grant, files are transferred to the ORSP storage area where they are stored for a period of three years. After three years, records are removed and processed for destruction.
- Whenever an agency requires that records be kept for a longer period of time, ORSP honors the agency's requirement.

Faculty/Principal Investigators

1. PI's must notify ORSP and their College Dean when they submit technical or scientific reports to funding agencies.
2. PI's are responsible for maintaining copies of their scientific or technical reports, and are responsible for notifying campus officials when they submit their reports or deliverable to funding agencies.

Other campus units

In addition to ORSP, other campus units and individuals have responsibility to maintain sponsored program-related records:

- Fiscal Affairs
- Internal Audit
- Committee for the Protection of Human and Animal Subjects

These units comply with federal, State of California, and CSU requirements.

The following dispositions apply to all records maintained by ORSP:

	Type of record	Filing and disposition
1	Contract and Grant active award files	Maintained in ORSP for the entire performance period of the project
2	Contract and Grant closed project files	Kept in ORSP storage for three years from the date of closing
3	Contract and Grant closed project files after three years from the date the final expenditure report is delivered	Destroyed following administrative guidelines for disposition of administrative records after the date of the final expenditure report is delivered

1. **Fiscal Affairs Records Policy for all sponsored programs (federal, state, local and private)– records (including 269 &272).**

- All records for contract and grants shall be retained for a period of three years from the date the final expenditure reports are submitted.
- All State–Trail Balance, Budget Reports, Statement of Changes in Fund Balance, statement of Financial Condition and Reconciliation of State Controller's Accounts with Agency shall be retained for two years after audit or four years without audit, whichever occurs first.
- General and Subsidiary Ledgers will be retained for no less than two years at the end of the last entry.
- Accounts Receivable Aging Reports, Remittance to State Treasury, Notice of Transfer of Funds and Escheat of Cancelled Warrants will be retained two years after audit or four years without audit.
- All Title IV Programs will be retained for three years from the end of the award year in which the report was submitted except for Perkins Loans.
- Perkins Repayment Records will be retained for three years from the date on which the loan is assigned to ED, cancelled or repaid.

This Fiscal Affairs procedure was last revised in May 2006.

2. Committee for the Protection of Human Subjects (CPHS)

- CPHS records shall include copies of all research proposals reviewed, scientific evaluations, if any, that accompany the proposals, approved sample consent documents, progress reports submitted by investigators, and reports of injuries to subjects.
- The records required by this regulation shall be retained for at least three years after completion of the research.

PROCEDURE

A. Archiving Files

The ORSP Special Projects Manager supervises this activity and assigns it to a staff member, who is responsible for the following steps:

1. Selects award files for projects that have expired, are closed out, 90 days after SFSU has submitted the final expenditure report.
Frequency: every quarter at March, June, September, December intervals, by the 30th of the month.
2. Reviews each file to verify if the funding agency specifies any special requirements on document retention. If special requirements call for a different document retention period, staff assigns such a period to the file(s).
3. Selects files for disposition according to the Document Management and Retention Policy.
4. Enters document disposition data into the Document Management Database, ensuring that the information reflects the corresponding award. The data recorded in the database includes:
 - a. Project Title
 - b. Project ID
 - c. PI
 - d. Project Performance Dates
 - e. Storage Date
 - f. Disposition Date
 - g. Disposition Completed
 - h. Initials
 - i. Notes
5. Labels each box with dates scheduled for purging.
6. Transfers file boxes to assigned storage for ORSP.

B. Purging Files

1. Checks database for files that are ready to be purged.
Frequency: every quarter at March, June, September, December intervals, by the 30th of the month.
2. Contacts the University contractor for document shredding, indicating the number of boxes to be retired and their location. The contractor issues an estimate. Staff processes a request for payment.
3. Pulls files from labeled boxes and turns them to the contractor.
4. The contractor purges the files.

RELATED DOCUMENTS

- *Federal*
 - [OMB Circular A-110, Subpart C .53](#)
 - [Sarbanes-Oxley Act of 2002, Section 802 \(Criminal Penalty for Altering documents\)](#)
 - [U.S. Securities and Exchange Commission, 2003-11: Rule 2-06](#)

- *State*
 - [California Government Code, Section 14755, 14756 \(Financial Code\)](#)
 - State University Administrative Manual (SUAM), Sections 4801, 4863, 4864
 - [State Education Code, Section 89045](#)
 - [California Records and Information Management, Records Retention Handbook](#)

- *SFSU*
 - [Fiscal Affairs Record Retention Policy](#)
 - [Fiscal Affairs Record Retention Schedule](#)

**San Francisco State University
Office of Research and Sponsored Programs
Document Disposition Form**

This form is to track information regarding document storage and disposition.

Project Title:

Project ID:

PI:

Project Performance Dates:

Document Disposition Date:

Notes:

Signature: