



<b>New Jersey Institute of Technology</b>	<b>Number:</b>	<b>12-07</b>
<b>University Policies and Procedures</b>	<b>Date of Issue:</b>	<b>October 12, 2011</b>
<b>Subject: GRANTS AND CONTRACTS - RECORDS RETENTION</b>		

**A. OVERVIEW**

Records related to Federal and State grants and contracts are retained in accordance with the requirements established by Office of Management and Budget (OMB) Circular A-110. Records related to classified documents are retained in accordance with the guidelines established by the National Industrial Security Program Operating Manual. Compliance is the responsibility of the Principal Investigator, Sponsored Research Administration, Grant and Contract Accounting, and other university departments.

**B. PURPOSE**

The purpose of this policy is to ensure that:

- The university is in compliance with Federal and State records retention requirements,
- Critical records are maintained and are available for operational needs,
- Use of space is optimized,
- Records retention costs are minimized,
- Records with no continuing value are destroyed.

**C. DEFINITIONS**

OMB Circular A-110	Standards for obtaining consistency and uniformity among Federal agencies in the administration of grants to and agreements with institutions of higher education, hospitals, and other non-profit organizations. <a href="http://www.whitehouse.gov/omb/circulars/a110/a110.html">http://www.whitehouse.gov/omb/circulars/a110/a110.html</a>
FSO	Facilities Security Officer
GCA	Grant and Contract Accounting Department
PI	Principal Investigator
SRA	Sponsored Research Administration

#### **D. PROCEDURES**

Records related to grants and contracts will be retained for a period of three (3) years from the last day of the fiscal year in which the final expenditure report was submitted to the awarding agency. For those grants and contracts that are renewed quarterly, semi-annually or annually, records will be retained for a period of three (3) years from the last day of the fiscal year in which the quarterly, semiannual or annual report was submitted to the awarding agency.

Records for real property and equipment acquired with Federal or State funds shall be retained for a period of three (3) years from the last day of the fiscal year in which the real property or equipment is disposed of.

The existence of any litigation, claim or audit will result in the extension of the three year retention period to the last day of the fiscal year in which the matter is resolved and final action is taken.

The three year retention period will not apply to those records which are transferred to, or maintained by, the awarding agency.

Indirect cost rate proposals, including all supporting documentation such as space survey analyses and cost allocation computations, will be retained for three (3) years from the end of the fiscal year in which the indirect cost rate proposal is submitted to the U.S. Department of Health and Human Services, the university's cognizant federal agency.

An awarding agency may require that records related to a specific grant or contract be retained for a period other than that set forth above. In such a case the records are to be retained for the longer of the period required by the specific grant or contract or the period set forth above.

#### **E. RESPONSIBILITY**

Responsibility for adherence to this bulletin is spread among the many individuals and departments associated with specific grants and contracts.

The PI is responsible for the retention of all documents related to his/her grant and contract activities. Such documents include, but are not limited to, technical documents regarding the methods used to conduct the research, results of the research, and progress and performance reports.

SRA is responsible for the retention of all documents related to the administration of grants and contracts. Such documents include, but are not limited to, pre-award documentation, proposals, notifications of award, grant and contract agreements, subcontracts, and correspondence with the awarding agency.

GCA is responsible for the retention of all documents related to the financial and control aspects of grants and contracts. Such documents include, but are not limited to, award budgets, financial reports, invoices to the awarding agency, and time and effort certifications.

Other university departments are also responsible for the retention of grant and contract award documents. The Human Resources Department is responsible for the retention of documents related to the work status of employees, including PIs, faculty and staff members, working on grants and contracts, including, but not limited to, Forms I-9, Personnel Action Forms, and appointment letters. The Payroll Department is responsible for the retention of documents related to the compensation of employees, including, but not limited to, salary information and pay data. The Accounts Payable Department is responsible for the retention of documents supporting expenditures for purchases of equipment, materials and services, and for travel expenditures.

#### **F. OWNERSHIP OF RECORDS**

Records related to grants and contracts are the property of the university. They do not belong to the employees who helped create such records. Employees have no personal or property right to any records of the university. No employee may remove or copy a university record for personal use.

#### **G. DESTRUCTION OF RECORDS**

Upon the completion of the records retention period, records are to be destroyed in a manner that ensures that documents of a confidential nature will no longer be able to be read or interpreted. The following methods of destruction are to be used:

- Paper records will be shredded,
- Electronic records will be erased,
- Audio, video, or film recordings will be physically destroyed.

Records that are not of a confidential nature can be disposed of or recycled.

## **H. CLASSIFIED DOCUMENTS**

The university is classified as a Cleared Facility under a Department of Defense Security Agreement and a Department of Defense Form 254, *Contract Security Classification Specification*, which authorizes the possession of classified documents at the Confidential and Secret levels. Consequently, the university is required to follow the records retention guidelines outlined in the National Industrial Security Program Operating Manual, which sets forth the regulatory issues involved in the management, retention, and destruction of classified material.

The university's FSO has the overall responsibility for document management, which includes receiving, storing, distributing, collecting and destroying classified documents.

Certain documents classified at the Confidential and Secret levels are received via a U.S. Post Office Box dedicated to this purpose. These documents are stored in a secure container maintained in a locked SRA office which is protected by an intrusion detection system that is monitored by the NJIT Police Department.

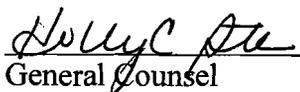
These classified documents can only be viewed inside of the locked room, and only by employees who are working under the current contract, are cleared at the appropriate security level, and have a "need to know." The date and time duration of access to these documents is recorded and initialed by the viewing employee and the FSO.

All classified documents must be retained in the secure container for a period of two (2) years after the completion of a classified contract.

Destruction of classified documents is accomplished by shredding and burning them upon the completion of the retention period.

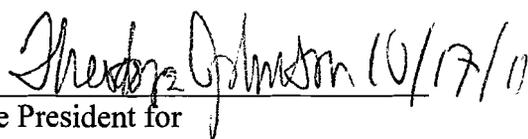
The FSO will maintain a file recording all of the above procedures, including the details of the destruction of the classified documents, for a period of at least two (2) years after the destruction of the classified documents.

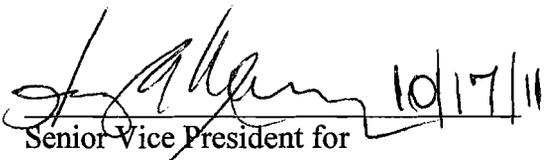
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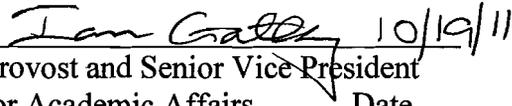
  
General Counsel                      10/17/11  
Date

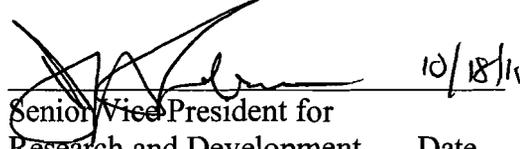
  
President                                      10/18/11  
Date

**Approval:**

  
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Vice President for  
Human Resources                      Date

  
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Senior Vice President for  
Administration and Treasurer      Date

  
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Provost and Senior Vice President  
for Academic Affairs                  Date

  
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Senior Vice President for  
Research and Development          Date