

SPO Document Retention Guidelines

Research Administration Forum

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Objective:

- To address department questions regarding sponsored program document retention
- Explain SPO document retention processes
- Provide resources to inform departmental document retention

SPO's Record Retention Policy

Sponsored Program's record retention policy is a combination of the following entities, always following the strictest policy for each award type:

- Sponsor Agencies
- UCOP Record Retention Schedule
- Code of Federal Regulations
- UC Davis approved procedures

SPO Retention & Destruction Basics

Definitions:

- **Retention** = archived until or if a destruction date is reached
- **Destruction** = confidential file shredding

SPO Retention & Destruction Basics

- **Unless an award has special retention and destruction requirements, the award is deemed “standard”**
- **Standard Award Files: 6-year file retention, then destruction**

SPO Retention & Destruction Basics

Non-standard Award Files:

- Clinical Trials: Do Not Destroy—archived until further review by SPO
- Industry/For-profit Sponsor: Do Not Destroy—archived until further review by SPO
- State Water Resources Control Board: 36-year retention, then destruction

SPO Retention & Destruction Basics

- Radioactive Materials:

If sponsor = Dept. of Energy

AND

Datasheet/Cayuse IPF radiation question = YES,
then the file must be reviewed for inclusion of radioactive material on
project.

YES for radioactive material: Do Not Destroy

NO for radioactive material: Standard 6-year retention then destruction

SPO Retention & Destruction Business Process Details:

In accordance with the UCOP Records Retention Schedule and the Code of Federal Regulations, the SPO Closeouts business process must follow these rules:

1.) If the “Project Type” = “**Clinical Trial**,” then set file aside for further review by SPO. Keep an inventory which is inside of or adhered to each box.

These files will be retained for 2 years following marketing application approval date for the drug/device; or if IND application is filed, for two years after the investigation is discontinued and the FDA is notified. If no notification of any one of these activities occurs, then retain these records for 6 years after the expiration/termination of the project.

SPO Retention & Destruction Business Process Details:

2.) If the sponsor is **industry/for-profit**, then box record for storage and permanent retention. Keep an inventory which is inside of or adhered to each box.

SPO Retention & Destruction Business Process Details:

4.) For all other award files, if such award expired or was terminated more than six (6) years prior, shred the file and document the shred date on an inventory. The closeout analyst needn't review these files.

Why timely destruction of award files is important:

- Failure to carry out timely destruction can lead to the unnecessary expenditure of resources to store, maintain, search for, and produce records.
- When records may be destroyed at the end of the retention period but are not, such records remain subject to future requests under statute or legal proceedings (e.g., California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding).

SPO Retention/Archive/Storage Guidelines:

- SPO Award files are boxed by award type (standard, clinical trial, industry/for-profit sponsor, State Water Resources Control Board, etc.)
- Archive boxes labeled and numbered, with scheduled destruction date included
- Maintain inventory of all closed awards on spreadsheet containing the following information:
 - SPO #, Award #, PI Name, Sponsor, Project Title, File Location (archive box #)

Document Retention Best Practices & Resources for Departments:

- Check out the UCOP resources on this subject. The university maintains a record retention schedule that defines the period of time that records should be retained and when they should be destroyed.

Link here: <https://recordsretention.ucop.edu/>

Document Retention Best Practices & Resources for Departments:

[UCOP Retention Schedule \(see link for complete list\)](#)

Research enterprise-related records that are covered by the record retention schedule include:

- Institutional Animal Care and Use Committee (IACUC)
- Conflict of Interest (COI)
- Agreements, Awards & Contracts
- Institutional Review Board (IRB)
- Health Insurance Portability And Accountability Act (HIPAA)
- Research Misconduct
- Biohazard Use

Read the UCOP Records Retention Schedule:

<https://recordsretention.ucop.edu/>

UNIVERSITY OF CALIFORNIA Records Retention Schedule

SEARCH THE SCHEDULE

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RESOURCES

[Retention Schedule FAQs \(PDF\)](#)
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ANNOUNCEMENTS

[6/11/2019 \(PDF\)](#)
[4/12/2017 \(PDF\)](#)
[3/21/2014 \(PDF\)](#)
[8/1/2013 \(PDF\)](#)

About the Schedule

Knowing what records to keep and for how long is challenging. A records retention schedule defines the period of time that records should be retained and when they should be destroyed. Various requirements based in law and university policy govern the retention of administrative records. A retention schedule is critical for promoting responsible records management, mitigating risk, and ensuring consistent compliance across UC. The University Records Management Committee (RMC) is charged with developing and maintaining the universitywide records retention schedule. To gain an understanding on how to use the schedule, review this [webinar](#). Questions regarding the schedule should be directed to the appropriate [campus Records Management Coordinator](#).

It is important for all members of the University community to adhere to the retention periods in the schedule (except in the cases of a records hold). The schedule serves as the lawful authorization for the disposition of records; consequences of not following the schedule may include court-imposed legal sanctions.

Schedule update project

The RMC currently is conducting a systemwide project to update the records retention schedule. See [Schedule Update Project](#) for more information.

Records included in the schedule

Per University policy, RMP-1, "University Records Management Program," and except as superseded by federal laws and regulations, and university contracts, the retention schedule applies to all administrative records, regardless of their medium, owned by the

- University of California campuses and the Office of the President,
- University of California health sciences centers, and
- Department of Energy laboratories managed by the University of California.

The schedule does not apply to

- Administrative records held by the Principal Officers of The Regents.
- Teaching and research records (e.g., library materials, faculty research and teaching materials, student examinations), or
- Records pertaining to individual patient care (medical records).

Records holds

If pending, foreseeable, or ongoing litigation; an investigation; or an ongoing audit pertaining to the records is taking place, the records cannot be destroyed until these actions have been completed or resolved. For information about records holds, contact your [campus records management coordinator](#).

Appreciation goes to the University of Denver, the National Historical Publications and Records Commission, and Harvard University for their free, open-source, web-based software tool, which UC enhanced to use for managing, and distributing the UC records retention schedule. See <http://library.du.edu/collections-archives/digital/recordsauthority.html> and <http://code.google.com/p/records-authority/> for more information.

UCOP Records Retention Schedule:

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Search the Records Retention Schedule

- 01. General Routine Office Transitory Records
- 02. Program Administration Records
- 03. Payroll and Benefits Records
- 04. Human Resources Records
- 05. Financial and Procurement Records
- 06. Compliance Records
- 07. Public Safety Records
- 08. Capital Resources Records
- 09. Information Technology Records
- 10. Academic Records
- 11. Student Records
- 12. Research Administration Records
- 13. Risk Management Records
- 14. Intellectual Property Records
- 15. Environmental Health & Safety Records
- 16. Academic Personnel Records
- 17. Library Administration Records
- 18. Legacy Systems
- Admin: Applications, Requests
- Admin: Certificates, Licenses, Permits, Registration, Warrantees
- Admin: Leases
- Admin: Other
- Admin: Reports, Rosters
- Enterprise: Garage
- Enterprise: Storehouse and Receiving

UCOP Records Retention Schedule:

Function:

05. Financial and Procurement Records

Function Description:

→ These are records that document the financial and procurement activities of the University. These records relate to the bond financing, lending and banking, accounting, procurement, travel management, asset management and tax activities of the University. The records may include but are not limited to documentation of accounts receivable and payable records, deposit records, capital equipment and fixed asset inventories; and other related records.

Category:

A. Accounts Payable/Receivable, Procurement and Banking/Cash Handling Records

Category Description:

Accounts Payable/Receivable, Procurement and Banking/Cash Handling Records document the payment of bills and the receipt of revenues owed to the University. The records also document the procurement, billing, collection, and reconciliation of moneys and the status of funds, and other accountings of University funds, including auxiliary services. (Records that document competitive bidding records, including RFIs, RFIs, RFQs and all responses are

UCOP Records Retention Schedule:

Retention Period:



Official Record: Retain records for 5 years after the end of the fiscal year in which the bond matures, or 10 years after the end of the fiscal year following completion of the project - whichever is longer. All Other Copies: Copies are considered non- records, and should be retained only until their usefulness has passed, but never any longer than the official record.

Retention Rule:

Delete or destroy after the retention period has lapsed

Primary Owner:

Public Retention Schedule - Approved Date:

2020-05-04

Research Admin Record Disposition:


- Administrative Records Relating to Research: Retention & Disposition Requirements

[https://www.ucop.edu/research-policy-analysis-coordination/ files/retention disposition 2015-update.pdf](https://www.ucop.edu/research-policy-analysis-coordination/files/retention_disposition_2015-update.pdf)

Research Admin Record Disposition:

Administrative Records Relating to Research: Retention and Disposition Requirements

Last Updated: December 2016

Record	Retention Period	Primary Source / Secondary Source
RECORDS RELATING TO AGREEMENTS, AWARDS AND CONTRACTS		
 Financial records pertinent to an award (Federal, State and Private)	Retain records for 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer.	UC Records Retention Schedule, 0005A1*
Fiscal Reports, Federal Research	Retain records for 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer.	UC Records Retention Schedule, 0005A1*
Statistical records and supporting documents pertinent to an award (Federal, State and Private) for FDA Regulated Sponsored Projects for Investigational New Drugs Applications	Retain records for 2 years following the date a marketing application is approved for the drug for the indication for which it is being investigated; or, if no application is to be filed or if the application is not approved for such indication, until 2 years after the investigation is discontinued and FDA is notified. If no notification of any of these	UC Records Retention Schedule, 0012A2*

For Research Admin Community:

- Do you want to share how your department ensures proper retention of documents?
- Is everyone working with electronic files?

Resources:

- UCOP Records Management Committee:

<https://www.ucop.edu/information-technology-services/initiatives/records-management/records-management-committee.html>

- UC Davis Records Management Coordinator:

Kelley Walker, Records Manager, Office of the Campus Counsel

kniwalker@ucdavis.edu

Resources:

- UCOP Records Retention Schedule:

<https://recordsretention.ucop.edu/>

- Code of Federal Regulations:

<https://www.govinfo.gov/app/collection/cfr/2020/title2>

- Administrative Records Relating to Research: Retention & Disposition Requirements

https://www.ucop.edu/research-policy-analysis-coordination/files/retention_disposition_2015-update.pdf