

## **POLICY**

### **Records Retention and Destruction**

Topic: <b>Sponsored Awards Admin</b>	Department: <b>Grants</b>	Policy No: <b>5.20.02</b>	Effective Date: <b>12/26/14</b>	Page No: <b>1 of 2</b>
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**Purpose:** Boyce Thompson Institute for Plant Research (BTI) has established a Records Retention and Destruction Policy to maintain, protect or dispose of BTI records in accordance with OMB Circular A-122, A-110 (prior to 12/26/14), and 2 C.F.R. 200 Uniform Administrative Requirements for Federal Awards (effective 12/26/14), as well as terms of the individual contract or grant. This policy refers specifically to the Sponsored Awards Section. See 1.30.015, BTI's General Records Retention Schedule Policy for any additional information.

**Policy:**

1. It is the policy of BTI to retain records as required by law and to destroy them by means of shredding when appropriate.
2. Financial records, supporting documents, statistical records, and all other non-BTI records pertinent to a federal award must be retained for a period of 3 years (unless otherwise stated in terms of the award) from the date of submission of the final expenditure report and other close-out required documents, or for federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report as reported to the federal awarding agency or pass-through entity in the case of a recipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon BTI. The only exceptions are:
  - If any litigation, claim, or audit is started prior to the expiration of the 3 year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
  - When BTI is notified in writing by the federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for Facilities and Administrative Costs (IDC), or pass-through entity to extend the retention period.
  - Records for real property and equipment acquired with federal funds must be retained for 3 years after final disposition.
  - Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. When there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of BTI's fiscal year in which the program income is earned.
  - IDC rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: IDC rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
    - If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the federal government (or to the pass-through

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entity) to form the basis for negotiation of the rate, then the 3 year retention period for its supporting records starts from the date of such submission.

- If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the federal government (or to the pass-through entity) for negotiation purposes, then the 3 year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year covered by the proposal, plan, or other computation.
3. The federal awarding agency must request transfer of certain records to its custody from BTI when it determines that the records possess long-term retention value. To avoid duplicate recordkeeping, the federal awarding agency may make arrangements for BTI to retain any records that are continuously needed for joint use.
  4. Methods for collection, transmission, and storage of information must adhere to the May 2013 Executive Order on Making Open and Machine Readable the New Default for Government Information Act whereby whenever practical, collect, transmit, and store federal award-related information in open and machine readable forms rather than in closed formats or on paper. When original records are paper, electronic versions may be substituted through the use of duplication providing reasonable safeguards against alteration.
  5. The federal awarding agency, Inspectors General, the Comptroller of the United States, and the pass-through entity, or any of their authorized representatives, have the right to access any documents pertaining to the award, in order to make audits, examinations, excerpts, and transcripts. This includes access to BTI personnel for discussion related to such documents. The rights of access last as long as the records are retained.
  6. No federal awarding agency may place restrictions on BTI that limit public access to the records of BTI pertinent to a public award, except for protected personally identifiable information or when the federal awarding agency can demonstrate the need of such records to be kept confidential.