

There are a number of official retention schedules governing University records. Consequently, record retention is addressed in multiple ASU Policy Manuals and reconciling the requirements can be challenging. A separate schedule governing sponsored award records mandates the retention requirements for sponsored activity. Record retention periods for sponsored research records vary depending on the type of sponsor (Federal, state, other) and the type of record.

Each record type has a custodian charged with responsibility for maintaining the official record and ensuring its timely destruction. For sponsored research records, custodial responsibility resides primarily with Principal Investigators, Lead Units and Research Operations. In general, the party who generates a record is responsible for its retention and destruction.

Expenditure allowability rules unique to sponsored projects can result in requirements for documentation beyond what is generated for financial transactions on non-sponsored accounts. For example, CAS exceptions require written justification to deviate from direct vs. indirect charging norms; and, documentation of personnel charges should include PI authorization. Any documentation generated to meet the additional requirements unique to sponsored projects should be retained with, and for the time period applicable to, the standard transaction records.

It is also important to note that individual sponsors can deviate from these norms and specify retention periods unique to a sponsor, program, award or record type.

The [Sponsored Projects Records Retention Table](#) recaps the applicable retention period as defined by [Schedule Number 999-15-20](#) for Arizona State University Research Operations. This schedule issued by the Arizona State Library, Archives and Public Records division on January 8, 2015 supersedes prior retention schedules under Arizona State University, Office for Research and Sponsored Projects Administration, # 999-07-15, 10/24/2007 and Vice President for Research, Animal Care Program, (12/9/1991).

For questions related to specific documents or projects, please contact the assigned AMT GCO.

| Record Type | Record Custodian | | | Sponsor Type | Sponsored Retention Period |
|---|------------------------|------|---------------------|--------------------------------|---|
| | Principal Investigator | Unit | Research Operations | | |
| Sponsored research records: Lab notebooks, research data, technical reports, et al. | X | | | All | Governed by 'the standards of a faculty member's respective discipline'; must minimally meet requirement for sponsor type if award-specific |
| Sponsored award purchasing card transaction records | | X | | All | 5 Years after submission of the final project financial report |
| Sponsored award records (other than agreements, modifications, and purchasing card transactions) directly associated with unique sponsored awards. ¹ | | X | X | Federal | 3 Years after the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, 3 years from the date of submission of the quarterly or annual financial report |
| | | | | State | 5 Years after award end date |
| | | | | Other (Non-Federal, Non-State) | 3 Years after award end date |
| Sponsored research records not directly associated with unique sponsored awards, i.e., records not individually identifiable with a single award ² | | X | X | N/A | 3 Years after fiscal year created or received |
| Sponsored award agreements and modifications | | | X | All | 33 Years after award end date |

1 This category refers primarily to financial records as addressed in FIN 103 for non-sponsored accounts. Generally, the party that creates the document retains the document as the office of record. For example, the Unit creates a PV and therefore is the office of record for that document. Research Operations creates a J1 to adjust F&A; therefore, it retains that document as the office of record. Financial Services (including Property Control and HR-Data Management) retains copies of some associated financial records; Purchasing retains copies of some associated procurement records; and, OHR retains copies of some personnel records.

2 This category refers to records that are associated with multiple sponsored accounts. For example, consortia documents would be Unit-retained records within this category and MOU's would be Research Operations-retained records within this category.



**ARIZONA STATE
LIBRARY, ARCHIVES AND PUBLIC RECORDS**
A DIVISION OF THE ARIZONA SECRETARY OF STATE



**Arizona State University
Research Operations**

**Schedule Number:
999-15-20**

- Authority:** Pursuant to ARS §41-151.12, the retention periods listed herein are the minimum amount of time records may be kept. Keeping records for a time period shorter than their approved retention period is illegal.
- Only the Arizona State Library, Archives and Public Records has the authority to extend or decrease records retention periods. If it is believed that special circumstances warrant that records should be kept longer or shorter times than the time period listed in this schedule, contact the Records Management Center to request a change to the retention period.
- Records required for ongoing or foreseeable official proceedings such as audits, lawsuits or investigations, must be retained until released from such official proceedings, notwithstanding the instructions of this schedule.
- Archival Value:** Records designated as Permanent on the retention schedule must not be destroyed (ARS §39-101). If it is believed that special circumstances warrant other records to be retained permanently, contact the Arizona State Archives for assistance in determining historical or archival value. All records created prior to 1912 must be retained permanently. This retention schedule does not authorize the transfer of records to any repository other than the Arizona State Archives (ARS §41-151.09).
- Disposition:** This schedule is used in conjunction with the Report/Certificate of Records Destruction. All records disposed under this schedule must be reported on the Report/Certificate of Records Destruction, unless transferred to the Arizona State Archives.
- Format:** Retention periods listed on this schedule apply to all records regardless of physical form or characteristics. Records, regardless of format (including electronic, paper, microfilm, etc.) not listed in this schedule or on the approved General Retention Schedule, are not authorized to be destroyed.
- Copies:** Additional copies created for convenience or reference purposes should not be retained longer than the record copy listed in this schedule. Copies do not need to be reported on the Report/Certificate of Records Destruction when they are disposed.
- Supersedence:** This schedule supersedes Arizona State University, Office for Research and Sponsored Projects Administratin, # 999-07-15, 10/24/2007; and Vice President for Research, Animal Care Program, 12/9/1991.

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|--|---------------------|--|-------------------|
| Approval Recommended by: | Date: 11/14/2014 | Approval Authorized by: | Date: 1/8/2015 |
| Rob Spindler, Records Officer, Arizona State University | | Joan Clark, State Librarian and Director, Library, Archives & Public Records | |
| Retention review and approval by: | Date: 11/25/14 | Archival review and approval by: | Date: 1/7/2015 |
| Karen Gray, Records Analyst, Archives & Records Management | | Melanie Sturgeon, State Archivist & Director, Archives & Records Management | |

RECORDS MANAGEMENT CENTER

**Records Retention Schedule for
Arizona State University
Research Operations**

| <u>Item #</u> | <u>Records Series</u> | <u>Retention (Yrs.)</u> | <u>Remarks</u> |
|---------------|--|-------------------------|--|
| 1. | Institutional Review Board (IRB) and Institutional Animal Care and Use Committee IACUC Protocols, Training and Supporting Records | 3 | After protocol terminated 45 CFR 46, US Code Title 7; Public Health Service (PHS) Policy, PL 99-158 |
| 2. | Inspection Records, Reports and Supporting Documentation | 3 | After final report issued US Code Title 7, Public Health Service (PHS) Policy, PL 99-158 |
| 3. | Biosafety Disclosures and Supporting Records | 3 | After protocol terminated 2 CFR Part 200.333 |
| 4. | Financial Conflict of Interest Disclosures and Supporting Records | 3 | After final expenditure of award or proposal termination 42 CFR 50 |
| 5. | Export Control Records, Reports, Licenses and Supporting Documentation | 5 | After final report issued or termination International Traffic in Arms Regulations (ITAR) 22 CFR 122.5(a) and 22 CFR 762.6(a); Bureau of Industry and Security (BIS) 15 CFR 762.6; Office of Foreign Assets Control (OFAC) 31 CFR 501.601 |
| 6. | Security Clearance Records | 7 | After submission National Industrial Security Program Operating Manual (NISPOM) 2006 |
| 7. | Misconduct in Science Records | 3 | After final report issued 45 CFR 74.53 |

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|---------------|---|-------------------------|--|
| 8. | United States Department of Agriculture (USDA) Annual Reports and Licenses | 3 | After final report issued US Code Title 7 |
| 9. | Public Health Service, Office of Laboratory Animal Welfare (PHS OLAW) Assurance | 3 | After termination Public Health Service (PHS) Policy, PL 99-158 |
| 10. | Compliance Office and Animal Care Regulatory Correspondence | 3 | After protocol termination US Code Title 7, Public Health Service (PHS) Policy, PL 99-158 |
| 11. | Animal Care Association for Assessment and Accreditation of Laboratory Animal Care International (AAALACi) Accreditation Records, Reports and Supporting Documentation | 3 | After termination US Code Title 7, Public Health Service (PHS) Policy, PL 99-158 |
| 12. | Animal Care—Animal Procurement and Disposition Records | 3 | After protocol terminated US Code Title 7, Public Health Service (PHS) Policy, PL 99-158 |
| 13. | Animal Care—Animal Medical Records | 3 | After final disposition of the animal Section 2143, 9 CFR 2, 9 CFR 3, USDA Animal Care Resource Guide 03- 25-2011, US Code Title 7, Public Health Service (PHS) Policy, PL 99-158 |
| 14. | Animal Care—Controlled Drug Records | 2 | After protocol termination Drug Enforcement Administration (DEA) Practitioner's Manual |
| 15. | Animal Care—General Records | 2 | After creation |

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|---------------|---|-------------------------|---|
| 16. | U.S. Centers for Disease Control (CDC) Animal Care Autoclave Records | 3 | After inspection report issued 9 CFR 331, USDA and DOJ Requirements for Select Agent Program |
| 17. | Sponsored Award Agreements and Modifications Records directly associated with unique sponsored awards. | 33 | After award end date IRS Regulations, 26 CFR 1.6001.1(e) (tax exempt bond transactions); 26 CFR 1.148-5(d)(6)(iii)(E) of the arbitrage regulations |
| 18. | Federally Sponsored Award Records Other than Award Agreements and Modifications Records directly associated with unique federally sponsored awards. | 3 | After the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report 2 CFR Part 200.333 |
| 19. | State Sponsored Award Records Other than Award Agreements and Modifications Records directly associated with unique state sponsored awards. | 5 | After award end date ARS 35-214 |
| 20. | Non-Federal, Non-State Sponsored Award Records other than Award Agreements and Modifications Records directly associated with unique non-federal, non-state sponsored awards. | 3 | After award end date |
| 21. | Sponsored Research Records not Directly Associated with Unique Sponsored Awards | 3 | After fiscal year created or received |

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|---------------|---|-------------------------|--|
| 22. | Indirect Cost Rate Computations or Proposals, Cost Allocation Plans, and any Similar Accounting Computations Submitted for Negotiation | 3 | After submission date 2 CFR 200.333 |
| 23. | Indirect Cost Rate Computations or Proposals, Cost Allocation Plans, and any Similar Accounting Computations NOT Submitted for Negotiation | - | After end of fiscal year covered by the proposal, plan or other computation 2 CFR 200.333 |