

SPONSORED PROJECTS ADMINISTRATION POLICY ON RECORDS RETENTION

**Effective Date: May 2011
Revision: July 2015**

Policy Statement

Pursuant to Columbia University's Records Retention policy, this Policy establishes the Records Retention Schedule (the "RRS-SPA) for Sponsored Projects Administration ("SPA"). The RRS-SPA lists the types of University records for which SPA is the Office of Record and their retention periods. It is based upon legal and operational requirements and provides a framework for the life cycle management of University records.

Reason(s) for the Policy

This Policy is intended to assist the University in properly protecting and managing the records it needs to maintain, while eliminating the records that are no longer legally or operationally required. This will help to ensure that the University is following all applicable laws and regulations governing records retention and eliminating unnecessary records storage costs.

Primary Guidance to Which This Policy Responds

This Policy responds to applicable local, state, and federal statutes and regulations and internal policies that apply to records retention.

Roles and Responsibilities

Office of Record

The Office of Record is responsible for identifying the records to be retained and determining, in collaboration with the Office of the General Counsel ("OGC"), the period of retention. The Office of Record must also make arrangements for the proper storage of records and coordinate with outside vendors for that purpose, where appropriate. Finally, the Office of Record arranges for the handling of the disposal of records whose retention period has expired.

Office of the General Counsel

OGC is responsible for providing guidance regarding the legal retention requirements for documents and coordinating document holds when litigation is ongoing, pending, threatened, or likely. The University's General Counsel will designate one or more individuals to serve as the point of contact in OGC.

Responsible University Office

Sponsored Projects Administration

Revision History

This Policy revises an earlier version, dated May 2011.

What Is Governed By This Policy

The specific records covered by this Policy are listed in the RRS-SPA. Any record not listed on the RRS-SPA is *not* covered by this Policy, including but not limited to records containing personal health information.¹ This Policy applies to all University employees, including student workers and temporary workers, who create, use, or store the University's records for which there is a legal, regulatory, or management retention requirement. It also applies to any contractors, consultants, vendors involved in the creation, use, or storage of any records that belong to the University.

Who Should Know This Policy

All University employees, including student workers and temporary workers
All contractors who create, use, or store University records
All consultants who create, use, or store University records
All vendors who create, use, or store University records

Exclusions and Special Situations -- Document Holds

Any records relevant to pending or ongoing litigation, government investigation, or audit **MUST BE RETAINED** until such matters have been resolved, all appeals have been exhausted, and the applicable retention period has expired. All disposal of relevant records must cease, including the disposal of records following approved retention periods, when such a document hold is in place. In cases where litigation is threatened or likely, consult the OGC to determine whether a document hold is required.

Policy Text

Each RRS lists records that are specific to the particular Office of Record.

The Office of Record is the department that is fully responsible for the "official" copy of a record for the duration of the total retention period. Other departments that may have a copy of these records should retain the copy only as long as it is useful, except to the extent the records are subject to a document hold (see Exclusions and Special Situations – Document Holds above).

A. Defining a Record

Records are documents and parts of documents contained in any media and in any format That are made or received by the Office of Records; provide evidence of its operations; document business decisions; and/or have value requiring their retention for a specific period of time.

Examples include, but are not limited to:

- Letters, memoranda and correspondence
- Policies, procedures and manuals
- Invoices and receipts
- Purchase orders, contracts and certificates
- Tax forms

¹ For additional requirements for records associated with bond issuance, please see the [Post-Issuance Compliance Policy \(Tax Exempt Bond Financings\)](#)

- Data stored in computers, data processing equipment, and off-line media
- Computer programs and documentation
- Memory in pagers, cell phones and PDAs

The RRS-SPA can be found in Appendix A to this Policy. The RRS-SPA includes a description of the record, the department responsible for the record and the retention schedule for that record.

Note: This list is for purposes of this Policy only, and is not meant to provide a comprehensive list of records for purposes of any document hold. Recipients of a document hold should refer to the text of the hold itself for instructions regarding what types of records must be retained.

Non-Records:

Non-records are copies of records maintained in more than one location (provided such records are not subject to a document hold (see Exclusions Special Situations – Document Holds above) or materials available from public sources that can be disposed of at the discretion of the user. They include:

- Duplicates of original records, including:
 - Information copies of records maintained by departments that are not the Office of Record

Note: In some instances, annotated copies of records may necessitate that they be maintained

- Preliminary drafts including:
 - Drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps and/or decisions in the preparation of the official record
- Books, periodicals, manuals, training binders, newspapers, and other printed material obtained from outside sources and retained primarily for reference purposes
- Materials not filed as evidence of a department’s operations that have no informational value
- Spam, junk mail, and Listserv messages
- Blank forms

Note that disposition of records created, retained, or stored in information systems or computers should proceed on the same basis as traditional paper records. Digital or electronic records that are not covered by a schedule associated with this Policy, such as e-mail, should be deleted promptly. See email the University’s Email Usage Policy for more specific guidance.

B. Maintaining the RRS

SPA is responsible for ensuring the review and revision, if applicable, of the RRS-SPA. Periodically, it may be required that new records be added or that records that are no longer applicable be removed. It is recommended that SPA review its RRS-SPA every three years for accuracy.

C. Disposal of Records

Records should not be retained by SPA beyond their retention periods, as defined in the approved RRS-SPA, unless there are valid business reasons for their continued retention or they are required to be held under a document hold (see Exclusions and Special Situations –

Document Holds above). Disposal of records pursuant to this Policy should occur regardless of the medium in which records appear or their location.

As a general rule, records may be disposed of if:

- They have outlived their retention period per the approved RRS-SPA, AND
- Continued preservation is not required per a current document hold.

All disposal of records, whether paper or electronic, must be accomplished pursuant to the University's Sanitization and Disposal of Information Resources Policy.

(<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>). That Policy provides for particular methods of disposal (e.g., cross-shedding and/or approved electronic disposal) either on-site or through an approved outside vendor for records that may contain any sensitive or identifying personal information, to ensure that unauthorized individuals cannot access the information.

Sensitive or identifying personal information includes, but is not limited to, social security number, driver's license number, mother's maiden name, account numbers or codes, personal financial information, and/or protected health information.

D. Ongoing Retention of Records

Unless required to be retained pursuant to the approved RRS-SPA or a document hold, records should be purged of extraneous materials (e.g., non-current drafts of documents, rough notes, routine email, etc.) on a regular basis.

E. Retention of Records in Storage

SPA is responsible for ensuring that the disposal of records in archive storage for which it is the Office of Record takes place unless a document hold is in effect.

Contacts

Any questions or inquiries with respect to the administration of this Policy should be directed as follows.

Questions regarding the application of the policy:

Please submit inquiries via an Incident in Service Now:

Web form: <http://finance.columbia.edu/content/finance-service-center>

University Records Retention Policy (<http://policylibrary.columbia.edu/records-retention-policy>)

Cross References to Related Policies (<http://policylibrary.columbia.edu/>)

Sanitization and Disposal of Information Resources Policy

(<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>)

Email Usage Policy

(<http://policylibrary.columbia.edu/email-usage-policy-1>)

Appendix A – Records Retention Schedule

Record	Office of Record	Retention Period	Notes
Award and Contract Documents	Sponsored Projects Administration	Award date +11 years	
Award related Sponsor Correspondence	Sponsored Projects Administration	Award date +11 years	
Closeout Documents	Sponsored Projects Administration	Award date +11 years	
Proposal on Awarded Grants and Contracts	Sponsored Projects Administration	Award date +11 years	
Subaward Agreements	Sponsored Projects Administration	Award date +11 years	