

RECORD RETENTION FOR EXTERNALLY FUNDED SPONSORED ACTIVITIES

Policy Number: 5.0.10

Version Number: 01

Classification: Post-Award Administration

Effective Date: July 25, 2025

Responsible University Office: Grants and Contracts Administration

1.0 Purpose

The University is committed to the collection, maintenance, and safeguarding of research records in an accessible format. This policy provides the framework around the retention of documentation related to externally funded sponsored activities to ensure documentation is readily available for review and is in accordance with several regulatory citations. Retention of research records associated with sponsored activities is achieved and complimented by electronic systems of record, such as CONCUR for travel and an approved financial system to track and record transactions in separate accounting sources, as well as pdfs of award documentation, data files/reports from accounting systems, and more.

2.0 Applicability

This policy applies to all awards for sponsored activities, regardless of funding source/sponsor.

3.0 Governing Rules and Regulations

Federal Regulations: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UG) 2 CFR Part 200.334 – states records must be retained for three (3) years from the date of submission of the final financial report. For awards which are renewed quarterly/annually, records must be retained for three (3) years from the date of submission of the quarterly/annual financial report.

2 CFR Part 200.334 (a) – states records must be retained until all litigation, claims or audit findings are resolved, when the actions noted here are started before the expiration of the three (3) year period.

2 CFR Part 200.334 (b) – states when a recipient of federal funding is notified in writing by the sponsor or sponsor's cognizant agency to extend the record retention period, the recipient must comply.

State/Institutional Regulations: Clemson University, as a State of South Carolina institution, is required to abide by the records retention schedule found at this link for the General Records Retention Schedule for South Carolina State Colleges and

Universities: [textSCU](#) – Page 34; Subarticle 12-812.8 - Project Grant Awards and Contacts

This section of the General Records Retention Schedule for State Colleges and Universities requires records must be retained for three (3) years after expiration of funding or termination of contract and until no longer needed for reference.

Sponsor Regulations: Individual sponsors, via their agreed upon terms and conditions, often include their expectation of a retention period, specifically to the funding awarded. Records/documents will be retained for the specified period of time.

4.0 Definitions:

Sponsored Activities: Any externally funded research, public service, or scholarly activity having a defined scope of work often including a set of specific programmatic objectives and/or deliverables, a line-item-based budget, providing the basis for sponsor expectations and awardee accountability (i.e., a reciprocal transfer of something of value). Sponsored programs are funded through agreements that usually include terms and conditions for the disposition of tangible properties and outcomes (e.g., equipment, records, specified technical reports, theses, or dissertations) or intangible properties and outcomes (e.g., rights in data, copyrights, and inventions). **Note:** The terms sponsored activity, sponsored program, sponsored award, grant, contract, cooperative agreement, and/or research award are often used interchangeably.

Research Record: A university transaction or document including, but not limited to sponsored activities, whether funded or unfunded; progress and other scientific reports; financial transactions; invoices and financial reports; laboratory notebooks; correspondence; videos; photographs; slides; biological materials; computer files and printouts; manuscripts and publications; equipment use logs; laboratory procurement records; animal facility records; human and animal subject protocols; etc. Research records include any data, document, computer file, or any other written or non-written account or object that reasonably may be expected to provide evidence or information regarding the proposed, conducted, or reported research.

5.0 Policy

Records/documents related to the financial and technical work conducted for a sponsored activity are subject to many regulations. These include Federal, State and Sponsor as identified in section 3.0 above. When applicable regulations are not in agreement, the university will retain records in accordance with the most restrictive/longest time.

Example: A contractual agreement with the Department of Defense requires a ten (10) year retention period at the expiration of the award and final submission of financial deliverables. *Since this retention period is longer than other regulatory guidance, records/documents related to this one sponsored activity will be held for the required ten (10) years.*

Records and documentation meeting the minimum required retention threshold(s), without the presence of litigation, claims or audit findings and after all litigation, claims or audit findings are resolved, can be permanently destroyed/purged by the university after the applicable retention period has been reached.

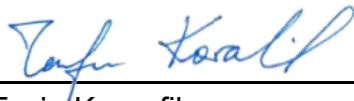
Records and documentation created during the life of an externally sponsored award are the property of the university and must be retained in accordance with the regulatory guidance above.

6.0 Responsibilities

It is the shared responsibility of PIs, departments, colleges and central offices to ensure records and documents are retained in accordance with the most restrictive time period when considering the regulatory documents above.

7.0 Signature Approvals

This policy has been approved by:



Tanju Karanfil

Senior Vice-President for Research and Creative Endeavors

Revision History

| EFFECTIVE DATE | REVISION NUMBER | MODIFICATION |
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| 7/25/2025 | 0000 | |
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