



FEDERAL AWARD RECORD RETENTION POLICY

Policy No.: CU-OSP-80

Section 1. General

- 1.1 Scope: This policy applies to all sponsored projects, contracts, and/or grant award records received in the Concord University Office of Sponsored Programs. This policy is applicable to grants awarded after December 26, 2014.
- 1.2 Authority: W. Va. Code § 18B-1-6; 2 CFR 200, referred to as “The Uniform Guidance on Federal Awards.”
- 1.3 Effective Date: June 03, 2025
- 1.4 Purpose: The purpose of this policy is to establish protocols for the retention of data and records pertaining to University sponsored projects, contracts, and/or federal grant awards.

Section 2. Policy

- 2.1 In compliance with the Uniform Guidance of Federal Awards, it is the policy of Concord University to retain records pertaining to all sponsored activities for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient, unless otherwise noted in the contract and/or award document. All exceptions to this policy are noted and limited to those outlined in 2 CFR 200.334.
- 2.2 Memorandums of Agreement or Memorandums of Understanding will be retained for a period of three (3) years after the submission of the final financial report if fiscal management is a result of the agreement. When no fiscal management is required, the Memorandum will still be retained for three (3) years.
- 2.3 If the Memorandum is part of a funded contract, project, and/or grant, the Memorandum will be retained as long as the grant’s file is maintained in the Office of Sponsored Programs.

Section 3. Definitions

Record – A record is any document, electronic file, book, paper, photograph, sound recording, or other material, regardless of physical form or characteristics, made or received in connection with the transaction of official state government business.

Section 4. Responsibility for Implementation

The Office of Sponsored Programs shall have primary responsibility for implementation and review of the developed procedures along with monitoring and updating this policy in accordance with federal award requirements.

Section 5. Amendments

This Policy may be amended to change or update any and all West Virginia Code citations, names, titles, links to information, grammar, and spelling without going through the rulemaking process.

Federal and State laws, rules and regulations change. The Board may modify any portion of this policy to conform with the University's practices with such changes. Subject to the University's rulemaking policy, the University will change this policy to conform to the most current laws, rules, and regulations within a reasonable time of discovering the change.

Approval:

Intent to Plan approved by Board of Governors: October 17, 2024

Policy approved by the Board of Governors: June 03, 2025