

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

AWARD MAINTENANCE

OFFICIAL AWARD FILE AND RECORD RETENTION

EFFECTIVE 12-01-08, REVISED 12-26-2014

POLICY #26

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PURPOSE:

To establish a policy and procedure for the content, organization, location, and retention of the university's official sponsored project award files. The award file is known as the Official Award File. This file does not replace or accumulate source documentation maintained in such offices as the Payroll Department, Accounts Payable Department, Office of Procurement Management, Contracts and Grants Accounting Department, etc. Modern technology enables, if the sponsor permits, the acceptance and storage of electronic data as primary documentation sources. Whenever necessary and/or appropriate, the university manages its financial storage and retrieval utilizing electronic mediums in lieu of original paper records.

DEFINITIONS:

Official Award File: The Office of Sponsored Programs (OSP) is responsible for maintenance and retention of all documents relating to the sponsored award and that would be subject to audit. The documents required to be maintained in this file are described below.

POLICY:

The OSP is responsible for maintaining an Official Award File for each sponsored award. This file, along with financial records maintained in Contracts and Grants Accounting Department (CGA) and programmatic records maintained by the Principal Investigator/Project Director (PI/PD), contains essential data for reporting, billing, and audit purposes. These records will be retained as required by the sponsor's policies, regulations, and laws and in accordance with university policies. The Official Award File originates with the proposal and is updated through the conclusion of the project, including post-project period activity, closeout and audit.

REFERENCES:

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- OMB Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>
- NIH Grants Policy Statement, <http://grants.nih.gov/grants/policy/policy.htm#gps>
- NSF Proposal and Award Policies and Procedures Guide, <http://www.nsf.gov/bfa/dias/policy/>
- HHS Grants Policy Statement, <http://www.hhs.gov/grants/grants/policies-regulations/index.html>
- Federal Acquisition Regulations (FAR), Title 48 C.F.R.
- NSU Records Management and Destruction Policy, www.nova.edu/records

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PROCEDURES:

Official Award File

1. Once an award is accepted, the Official Award File will be created by OSP. All essential non-financial data related to the award are to be filed in the Official Award File, which is maintained electronically on the OSP shared drive (Official financial records are maintained by CGA).
2. Upon completion of the project, the Official Award File is archived and is moved to a closed file and kept in accordance with the retention policy outlined below.
3. The Official Award File is comprised of eight sections as described below:

Section I - Pre Award

- Request for Proposal, Request for Application, Agency Announcement, etc.;
- Proposal and any revisions to the proposal;
- Internal compliance forms (Proposal Approval Record (PAR), Facilities and administrative (F&A) cost waiver; PHS Assurance, PI/PD Responsibilities on Sponsored Projects, Cost Share Approval Form, etc. as applicable);
- Award Review and Approval Form
- Correspondence related to proposal submission

Section II - Sponsor

- Original award document (i.e., Notice of Grant or Cooperative Agreement Award, contract, purchase order) including all terms and conditions (which may be incorporated by reference)
- Subsequent amendments and modifications
- All correspondence with the sponsor except for those related to reporting (Section VI) or compliance (Section V) actions

Section III - Project Digest & Budget Related Items

- Banner Index Number Assignment Request
- Project Digest including summary of all pertinent information concerning the award that contains award attributes, PI, project title, NSU index number, NSU departmental contact, award reference number, funding amount, effective project and budget dates, technical and fiscal reporting requirements, IRB requirements, administrative regulations, and line item budget with revenue and expense object codes.
- Re-budgeting Requests
- Request for Use of an Unobligated Balance from a Fixed-Amount Award
- Applicable internal correspondence related to Project Digest and Budget actions

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Section IV - 3rd Party Agreements

- Original outbound subaward, fee-for-service or consulting agreement issued by OSP
- Amendments and modifications
- Restricted Parties Screening
- 3rd party insurance and audit documentation
- Correspondence with 3rd parties
- Applicable internal correspondence

Section V - Assurances, Certifications & Compliance

- IRB and IACUC documentation, if applicable
- Conflict of Interest Form(s)
- Audit submission(s)
- Submission of NSU insurance certificates, if applicable
- Internal and sponsor correspondence related to compliance actions

Section VI - Reports

- Technical progress reports
- Applicable internal forms related to progress report submission
- Final invoice and/or financial report (all financial records are maintained by CGA)
- Other required reports, as applicable
- Internal and sponsor correspondence related to reporting actions

Billing and Financial Reporting - These records are maintained by CGA and include but are not limited to:

- Monthly, quarterly, semi-annual, or annual financial reports/invoices
- Reports and supporting documents used in billing preparation
- Final financial report/invoice

4. The electronic files are subject to periodic quality control review by OSP staff to ensure completeness, reasonable safeguards against alteration, and readability of the records.

Record Retention

1. Records related to sponsored programs will be retained in accordance with the Nova Southeastern University *Records Management and Destruction Policy* and as required by sponsors' policies and regulations.