Overview of Procedure

The District is responsible for retaining the programmatic and financial records of federal and non-federal grants for a minimum of six (6) years. Grant Program Managers (GPMs) and Principals are responsible for obtaining and preserving all pertinent programmatic and financial grant records for federal and non-federal grants assigned to them or their offices and schools. Other District offices and departments involved in federal and non-federal grant implementation and execution including Grant Fiscal Services (GFS) Grant Budget Analysts (GBAs), Grant Compliance Office (GCO) Grant Compliance Monitors (GCMs), the Grant Accounting Unit in Finance are responsible for retaining the records that substantiate and support their grant related job responsibilities.

Files are expected to be kept current and easily accessible, and grant management staff must be prepared to produce grant records upon request. The ability to produce such records upon request is to consider those records to be in an “audit ready” status. In addition, the GCO must be notified when a new GPM or school Principal is assigned to a school or office with grant management responsibilities, and will assign a GCM to work with the departing and incoming managers to ensure all relevant grant files are accounted for and accessible. The GCM will also assess the grant management training needs of incoming managers and arrange for appropriate instruction on specific grant requirements and on policies and procedures in general. Finally, GCMs will perform periodic checks of grant record files to verify that they are complete, current and compliant.

Finally, the Office of Grant Development and Compliance (OGDC) has implemented a key compliance document collection, storage and retrieval system to ensure that relevant information is maintained for future reference. However, this system is an additional support and is not designed or intended to replace the assigned responsibilities as documented in these policies and procedures for record retention.

Procedure Details

The required documentation checklists in the Forms Section below should be used by the departments and schools responsible for federal and non-federal grant management to ensure that adequate and appropriate record documentation is captured and retained in accordance with the GPI400 District's Documentation and Record Retention Policy. The GCO does not prescribe a specific file folder structure for hard copy or electronic grant files. However, it is the responsibility of GPMs and school principals to maintain all grant files in a coherent folder structure, preferably matching the life cycle of a grant (e.g., Award, Program Plan and Budget, Budget Amendments, Journal Vouchers, Financial Reports, Employee Time and Effort Records / Supplemental Pay Events, Program Results and Evaluations, etc.). Other offices and departments are encouraged to use the checklists to create an internally consistent record retention structure (hard copy or electronic) for use by staff.

The checklists in the Form Section below also serve as a transition tool for departing and incoming GPMs and school Principals and other personnel and therefore contain transition signatures. See the GP2400 Monitoring Grants Management and Compliance for transition process details. Some of the items noted on the checklists may not be relevant for all grants and some grants may have additional record retention requirements, such as for Title I documents in schools.
Policy
• GP1400: Documentation and Record Retention

Forms
Grant Program Managers and Principals
• GPM / School Principal Checklist

Grant Fiscal Services
• Grant Budget Analyst Checklist

Grant Accounting Unit
• Grant Accounting Record Retention Checklist

Office of Research and Evaluation
• Office of Research and Evaluation Record Retention Checklist

Definitions
Records are information, regardless of physical form or characteristics, that document a transaction or activity of the District and that is created, received or retained pursuant to law or in connection with a transaction, business or activity of the District. The term includes a document, paper, letter, information stored or maintained electronically and a data-processed or image-processed document.

Contacts
• Grant Compliance Office
• Records Management Office
• Office of Grant Development
• Grant Accounting Unit
• Grant Fiscal Services

Frequently Asked Questions

Related Information
• SRC Policy 800, Records Management
• District’s Records Center User Guide
• District’s Administrative Records Retention Schedule
• 2 CFR Part 200.333 through 200.337
• GP2400 Monitoring Grants Management and Compliance

History
Amended:
• Amended on 10/24/13 to include reference to the OGDC scanned document database of key compliance files.
• Amended on 4/27/2015 to make UGG reference updates and technical adjustments.