	SOP: ORSP Record Retention of Research Data and Materials Responsible Office: Office of Research and Sponsored Programs			
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I. Purpose

The purpose of this procedure is to provide guidance to the Office of Research and Sponsored Programs as it relates to the retention of all research data and materials generated with the support of Lehigh research. This procedure is a subset of the Lehigh University Records Management and Retention Policy.

II. Scope

This procedure and the associated policy statement in the Lehigh University policy applies to all Lehigh faculty, staff, students, consultants and any others involved in the design, conduct or reporting of research.

III. Relevant University Policy

[Lehigh University Records Management and Retention Policy](#)

IV. Procedure

1. Record Retention Period

Research data and materials related to grant proposals, awards and supporting documentation must be retained by Lehigh ORSP for three (3) years from the date of the 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. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

- (a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- (b) When notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period."

Longer retention periods may be required by Lehigh policy or non-federal sponsors in some circumstances. Lehigh researchers and ORSP are responsible for consulting these requirements and research data must be retained in accordance with those more stringent requirements. These include, but are not limited to, any specific requirements of patentable inventions resulting from the work; research involving human subjects; and capital equipment purchased on the award. Please refer to the University retention matrix found in the above policy.

2. At completion of Award


At the close of a sponsored award, once the final expenditure report is submitted to the sponsor, the purge date is calculated and marked on the file. Purge dates are set as stated in IV.1 above and according to Lehigh University policy.

The ORSP Post Award Coordinator then places the file in the "Archive" files, which are sorted by the purge date fiscal year, or as "Do Not Destroy – Equipment" or "Do Not Destroy – Invention".

3. Annually at the end of each fiscal year

The ORSP Pre and/or Post Award Coordinator pulls any files that have reached the disposal date for that year from the Archive files and disposes of them based on the University policy for disposal and destruction of records.

V. Roles and Responsibilities

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Responsible Party <i>(alphabetical order)</i>	List of Responsibilities
Office of Research and Sponsored Programs – Contract and Grant Specialist	<p>Ensure final expenditure report is submitted timely</p> <p>Prepare file for archiving including determining terms of sponsor and/or type of data to ensure retention based on results of the award (e.g. inventions, capital equipment purchases)</p> <p>Document disposal date on file or mark “Do Not Destroy”</p> <p>Provide closed file to Post Award Coordinator as part of the close out process</p>
Office of Research and Sponsored Programs – Pre/Post Award Coordinator	<p>Annually at conclusion of the fiscal year:</p> <ul style="list-style-type: none"> Review archive files for disposal date Dispose of any current dated files as described in Lehigh University record retention policy disposal process
Office of Research and Sponsored Programs – Post Award Coordinator	File “Closed” files with Archived files according to purge date fiscal year.
Researcher	<p>Timely completion and submission of Progress/Technical reports.</p> <p>Ensure the retention of original data and materials according to legal requirements, Lehigh policy and the terms and conditions of sponsored awards.</p>

VI. Definitions (optional)

Term <i>(alphabetical order)</i>	Definition
Active Records	Records needed to support the current activity on research awards.
Archived Records	Records for which the active period has passed and which are being held for the remainder of the specified retention period.
Office of Research and Sponsored Programs	Responsible office who serves as the owner of institutional business processes as it relates to research management. Serves as authorized official for acceptance of sponsored awards and disposition of related data and materials
Researcher	Most commonly the Principal Investigator of the sponsored award who is responsible for the design, conduct and reporting of the research.
Record Management and Retention Policy	An internal control document that indicates how records should be handled after the period of their active use.
Record Retention period	The minimum required length of time for which ORSP (for purposes of this procedure) is responsible for the maintenance of the records.