GCCSA Federal Grant Records Retention Procedure

Retention Responsibilities and Procedure

Grant Program Managers (GPMs) and, the Accountant, and the Administrative Team are responsible for obtaining and preserving all pertinent programmatic and financial grant records for federal grants assigned to them or their offices and schools.

The following procedures must be followed:
- The Administrative Team, GPMs and grant personnel 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.
- The Director 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, the Director will perform periodic checks of grant record files to verify that they are complete, current and compliant.
- It is the responsibility of GPMs, the Director,the accountant, and the Administrative team to maintain all grant files in a coherent structure, preferably matching the life cycle of a grant.

Records Access

GCCSA must allow the awarding agency complete access to any books, documents, papers, or other records of recipients which are pertinent to the award in the event the awarding agency needs to conduct monitoring. This access also applies to the pass-through entity (if applicable), or any of their authorized representatives. The right of access must not be limited to the required retention period but as long as the records are retained.

The following grant-related records may be retained along with any other pertinent records which relate to and/or evidence use of Federal funds:

Financial records Š
- Invoices, copies of paid bills, and receipts Š
- Time and attendance records Š
- Bank statements Š
- Contracts and subgrant documents Š
- Prior authorization approval documents

Procurement records Š
- Backup for contract type selection Š
- Basis for contractor selection Š
- Rejection or basis for contract price

Real Property Records

Property records should contain the following data:

- A description of the property which contains a unique identifier such as a serial number
- The cost and source of the property, for example, the vendor name if purchased
- Who holds the title, in other words, who owns the property: the Federal government or the grantee?
- The date the property was acquired and the percentage of Federal participation in the acquisition cost
- The current location of the property
- The current use and condition

If the property is not in use:

- The disposition instructions
- The date of disposal
- The sales price received from the disposal, if applicable

Other records
- Evidence of subrecipient monitoring (A-133 Audit Reports) Š
- Indirect cost rate proposals Š
- Cost allocation plans Š
- Cost-share documentation Š
- Compliance records