



## **POLICY & PROCEDURE DOCUMENT**

NUMBER: 3.2642  
2.2642

DIVISION: Finance and Administration  
Research

TITLE: Grants and Contracts Accounting - Closeout and Record Retention

DATE: June 30, 2014

REVISED: May 9, 2016, May 3, 2021

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### **I. Purpose and Scope**

This document outlines the policy and procedures to follow when closing out an award along with record retention requirements for closed out awards.

### **II. Policy**

1. It is the Principal Investigator's (PI) responsibility to ensure all objectives of the project are carried out as agreed upon and within the time frame established between Western Kentucky University (WKU) and the funding agency.
2. The PI is to oversee proper close out by:
  - a. being aware of the upcoming end date,
  - b. properly preparing for the close out, and
  - c. ensuring that all project related expenses are incurred and paid according to WKU policies and procedures and/or as stipulated by the funding agency.
3. The PI is to prepare all technical, narrative or progress reports.
4. The Grants and Contracts Accounting (GCA) office is responsible for filing all financial reports within the time frame established by the funding agency. If the funding agency

does not stipulate a final due date or language to the contrary, GCA will file the final report within 90 days following project end.

5. Closeout

It is the responsibility of GCA to make sure that all final invoices and financial reports are submitted, paid and that awards are closed in a timely manner.

6. Retention

- a. In compliance with current state & federal regulations, WKU will maintain all financial records, supporting documentation, and other records pertinent to a restricted project for at least three years from the date the final external audit was performed after the close of the award. If legal action, claim, or audit is started prior to the expiration of this retention period, WKU will maintain all records until final action has been taken and the matter resolved. Certain sponsors may require a longer retention policy than the standard three years.
- b. It is the responsibility of the PI and their office staff to maintain their own records for each award. They should be aware of the retention requirements for all of their awards. Certain documents such as pro-card receipts are held solely in their possession and in the event of an audit they may be required to produce such documents. The PI or their office associates can contact GCA with any questions regarding retention requirements for specific awards.

### **III. Procedures**

Once an award has ended and all invoices have been paid, GCA is responsible for the close-out of the award with the Sponsor and in Banner, the retention of the physical files, and file destruction when appropriate. Electronic files will remain in the financial system and are available for viewing at anytime.

More information can be found at the WKU Records Management website:  
<http://www.wku.edu/library/archive/rm.php>

### **IV. Reason for Revision**

May 2016

Non-substantive changes as a result of the five year policy review per Policy 0.000V Policy on Policies.

May 2021

Revisions made to Section III and non-substantive revisions made as part of the fifth-year policy review in accordance with Policy 0.000V Policy on Policies.

### **V. Related Policies**

All 3.25xx, 3.26xx and 3.27xx policies