



Record Retention Desk Reference

National Telecommunications and Information Administration (NTIA) Consolidated Appropriations Act, 2021 (CAA) Grant Programs

This document is intended solely to assist recipients in better understanding National Telecommunications and Information Administration (NTIA) Office of Internet Connectivity and Growth (OICG) Consolidated Appropriations Act, 2021 (CAA) grant programs and the requirements set forth in the Notice of Funding Opportunity (NOFOs) for these programs. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFOs. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFOs, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.



Record Retention Requirements for Federal Awards

Maintaining proper records is a critical part of complying with federal award regulations. It ensures transparency, accountability, and effective oversight.

Role of the Federal Awarding Entity (NTIA)

The National Telecommunications and Information Administration (NTIA) supports record retention compliance by:

- Monitoring grant recipients' efforts to retain all relevant award-related records in accordance with 2 CFR § 200.334.
- Ensuring records are accurately stored in the appropriate repositories or data management systems.



Retention and Access

Once the Period of Performance (PoP) ends, grant recipients must continue to retain all relevant records. Award records must remain accessible for review or inspection by NTIA.

- **NTIA is responsible for identifying federal award records with historical value and ensuring their archival preservation.**



Retain all records for three years.

All NTIA grant recipients must retain award records for a minimum of three years after submitting the final financial report (2 CFR 200.334) and provide the agency timely access to recipient's personnel for records-related interviews and discussions.

NTIA must notify grant recipients of federal record retention requirements, including what to keep, how long the documents must be kept, and that records must be available upon request.

- NTIA's right to access these records continues for as long as the records are retained, even beyond the required three-year period in some cases. However, NTIA cannot impose additional access requirements beyond what is permitted under 2 CFR 200, Subpart D.
- In cases where litigation, claims, or audits are initiated prior to the expiration of the three-year period, records must be retained until completion of the action and resolution of any issues associated with it or the end of the three-year retention period, whichever is later.
- Records to be retained include, but are not limited to financial records, supporting documentation, and statistical records.

Grant recipients must have record retention policies and procedures that dictate what federal award records to retain, the retention period, and the records storage standards and process.

There are four document categories that NTIA will monitor for record retention compliance:

Pre-Award & Award Records

1

Records of the development and submission of a funding request and documents used to ensure all preliminary steps and requirements were met.

Post-Award Records

2

Documents used to record performance, compliance, and financial management.

Closeout & Audit Records

3

Documents that record and confirm that all obligations were fulfilled, deliverables achieved, and any findings resolved.

Other Records

4

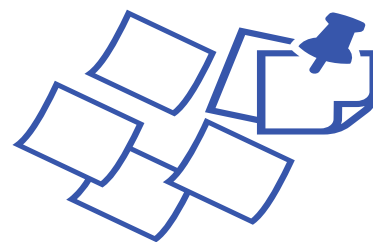
Supportive documents that don't fit into standard categories like financial, legal, or human resources records that are essential to retain for compliance, operational needs, or historical reference.

1

Grant recipients must retain both pre-award and award records to ensure regulatory compliance, support audits, and document the grant process.

Pre-Award and Award Records:

- ✓ Funding and award notices (NOFO, CD-450/CD-451, Notice of Award (NoA), signed contracts)
- ✓ Negotiation records
- ✓ Subaward and tribal-state agreements
- ✓ Budget documents and pre-award cost approvals
- ✓ Federal assistance applications (SF-424)
- ✓ Lobbying disclosures and certifications (SF-LLL, SF-424 forms)
- ✓ Subrecipient risk assessment and monitoring plans (as applicable)



Grant recipients must retain post-award administrative records to show compliance with the NOFO, relevant laws, regulations, and award terms. These records demonstrate fiscal and administrative oversight of the award.

2

Monitoring & Technical Assistance Records:

- ✓ Communications regarding monitoring and technical assistance with NTIA or subrecipients (calls, emails, meeting records)
- ✓ Monitoring reports and supporting documents
- ✓ Subrecipient training and technical assistance materials

Uniform Administrative Records

- ✓ Specific Award Conditions (SACs)
- ✓ Contracts, subcontracts, and amendments
- ✓ Fraud, waste, and abuse prevention measures
- ✓ Record transfer requests
- ✓ Data collection, transmission, and storage methods
- ✓ Subaward documentation and oversight
- ✓ Open Network compliance



Grant recipients must retain all records for **three years** after project closeout, including **records associated with the closeout period**. Also, if the program is audited during the period of performance or prior to the end of the three-year retention period, the grant recipient must keep all award-related records until the audit is closed.

Closeout Records : 2 CFR 200.344 and 2 CFR 200.345

- ✓ Performance Reports
- ✓ Closeout Notice
- ✓ Qualitative Narrative
- ✓ Record of disposition of Real Property, Equipment and Supplies
- ✓ Report of Inventor, Patents, Copyrights
- ✓ Closeout Summary Letter/Final Closeout Letter
- ✓ Proof of liquidating all financial obligations
- ✓ Proof of refunding any unobligated cash balances
- ✓ Any Uniform Commercial Code (UCC) Filings required for closeout.

Audits Records: 2 CFR 200.501

- ✓ Financial records and statements reviewed during the audit
- ✓ Proof of internal controls and procurement procedures documentation
- ✓ Final audit report



Grant recipients must retain **all other records** associated with their grant that do not fall into standard categories. These are the records that help clarify processes, explain program changes, or support requests for technical assistance. These records may include, but are not limited to:

Other Records:

- ✓ Records of Subrecipient Monitoring
- ✓ Successful outcome stories for all projects supported by the award
- ✓ Emails, Notification Letters, Conference Call Notes, Training Invitations, Technical Assistance Resources, Maps and Pictures
- ✓ Evidence of unintended program accomplishments

Personnel Records:

- ✓ Company Organizational Chart (including consultants, contractors, and interns)
- ✓ Project-related job descriptions
- ✓ Project Employees Resumes, Licenses, and Certifications
- ✓ List of Board Members and Contact Information
- ✓ Board Meeting Notes, Agendas and Vote Details
- ✓ Human Resources, Employee Records, Confidentiality Agreements (NDA)
- ✓ Employee Handbook



Record Retention Standards

NTIA will monitor grant recipients' record maintenance during the preparation for and execution of site visits, desk reviews, conference calls, or closeout.

NTIA, along with the Inspector General, the Comptroller General of the United States, or other authorized representatives, has the right to access the books, documents, papers, infographics, and other records of the grant recipient that pertain to the federal award. This allows for the examination, extraction, and transcription of records.

Retention Period ([2 CFR 200.334](#)):

- ✓ Grant recipients must keep records until any and all litigation, claims, or audits are resolved if initiated within the three-year retention period. Records must be retained until completion of the action and resolution of any issues associated with it or the end of the three-year retention period, whichever is later.
- ✓ Grant recipients must retain real property and equipment records for three years after final disposition.
- ✓ Grant recipients must retain records of program income earned after the PoP for three years from the fiscal year-end in which it was earned.
- ✓ Grant recipients must retain indirect cost rate proposals and cost allocation plans for three years:
 - From submission date if negotiated.
 - From fiscal year-end if not submitted.

Transfer Standards ([2 CFR 200.335](#)):

- ✓ NTIA may request records from the grant recipient if they have long-term value or may allow the awardee to retain the records if they remain continuously accessible to the federal government.

Record Collection, Transmission, and Storage ([2 CFR 200.336](#)):

- ✓ NTIA and grant recipients should collect, transmit, and store federal award-related information in open and machine-readable formats rather than in closed formats or on paper

Records Access ([2 CFR 200.337](#)):

- ✓ "Access to records is not limited to the required retention period; it will continue as long as the records are retained
 - ✓ Access extends to all forms of records, including electronic files, media, faxes, paper documents, and images.
 - ✓ Access may include interviews and discussions with recipient's personnel related to records of federal funding with the grant recipient.

Public Access to Records ([2 CFR 200.388](#))

- ✓ The Freedom of Information Act (5 U.S.C. 552) (FOIA) does not apply to records that remain under a grant recipient's control except as required under [2 CFR 200.315](#). Unless required by federal, state, local, and tribal statute, non-federal entities are not required to permit public access to their records.
- ✓ The grant recipient's records provided to NTIA generally will be subject to FOIA including applicable exemptions from disclosure.

Key records that grant recipients must retain throughout the grant lifecycle for compliance, transparency, and accountability include administrative, financial (use of funds), procurement (acquisition of goods/services), and property records (federally-funded assets).

Administrative Records

2 CFR 200.329:

- Baseline Reports
- Performance (Technical) Reports (Semi-Annual, Annual, and Final)
- Real Property Status Reports (SF-429)
- Tangible Personal Property Reports (SF-428)
- Tangible Personal Property Final Reports (SF-428 -B)
- Tangible Personal Property Report Supplemental Sheets (SF-428 - S)
- Conference call, site visit, desk review, and other technical assistance records (including communications and findings reports)
- Network Service Validation reports & attestations
- Federal Financial Reports (SF-425)
- Final Federal Financial Reports (SF-425)
- Annual Reports
- Research Performance Progress Reports (RPPR)(If applicable)

Financial Records

2 CFR 200.302:

- Budget Revisions & supporting documents
- Automated Standard Application for Payments (ASAP) drawdown documents including procedures
- Payroll and Financial Management Policies and Procedures
- Automated Clearing House ACH Vendor Form (SF-3881)
- Reimbursement/Drawdown Request (SF-270)
- Advance Payment Request and justification
- Payment records & ledgers (payroll/general)
- Rent, mortgage, and utility bills (project-related payments)
- Insurance (fidelity bond)
- Bids, quotes, invoices, cancelled checks, and purchase orders
- Timesheets and Personnel Activity Reports (PAR)
- Bank and credit card statements
- Non-construction forms (SF-424A/B)
- Travel authorizations and expenses
- Indirect cost documentation
- Program income details
- Prior authorizations (contracts, waivers, SAC)
- Construction forms (SF-424C/D)
- Funding match documents

Real Property & Equipment Records

2 CFR 200.311 and 2 CFR 200.313

- Descriptions of property and equipment
- Costs and sources of property or equipment
- Procurement date of property or equipment
- Current locations, asset tracking information, and serial numbers of property or equipment
- Purchase invoices and receipts
- Proof of payment (e.g., bank statements, cleared checks)
- Procurement documentation (e.g., bids, quotes, contracts)
- Title or deed documents for real property
- Depreciation schedules (if applicable)
- Use and disposition records
- Maintenance and repair logs
- Federal Interest Documentation (e.g., notices of federal interest, if required)
- Disposition Records Including:
 - Sale Price and Purchase Details (if applicable)
 - Method of Disposition
 - Date of Disposal

Procurement Records

2 CFR 200.318 and 2 CFR 200.501(g)

- Procurement policies and procedures (grant recipient, federal, and state)
- Request for Funding Proposals (RFPs), Request For Quotes (RFQs), Memorandums of Understanding (MOUs)
- Quotes and advertisements
- All executed contracts, bids, supporting competitive acquisitions or sole source justification, subcontracts, and consulting records
- Licenses, permits, certifications, and proof of insurance for all contracts and subcontracts
- Data mapping and environmental review clearance (if applicable)
- Backup and basis for contract selection
- Notice to Proceed (if applicable)
- Proof of reasonableness, basis for contract price
- Proof of Domestic Preference for Procurements (Buy American) compliance (as applicable)
- Proof of Davis Bacon Act compliance (if applicable)