Record Retention Requirements: Guidance for Human Subjects Research

This table will help investigators determine how long to keep research records based on the type of research and funding. For more information, see the University's Record Retention Policy.

Type of Record	Minimum Retention Period
COMIRB Responsibilities	
IRB Records (all records of communications with the IRB and all approval documents)	3 years after study closure
HIPAA Waiver IRB Determinations	6 years after study closure
Investigator Responsibilities	
Federally Funded Research	3 years after expiration of grant period
Other Funded Research	9 years after study closure (sponsors may have additional requirements to be followed)
FDA Regulated Research	2 years after marketing application is approved, or, if no marketing application is to be filed 2 years after the FDA is notified of study closure, *21 CFR 312.62 and 21 CFR 812.140*.
HIPAA Authorizations (combined with consent forms or stand-alone authorizations)	6 years after study closure
VA Research	All records regardless of format (paper, electronic, electronic systems) created in this directive must be managed per the National Archives and Records Administration (NARA) approved records schedules found in VHA RCS 10-1. *VHA DIRECTIVE 1200.05(1).*