

PI Transfer to New Institution

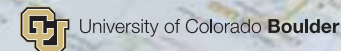
Mapping Responsibilities and Procedures

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SPONSORED PROJECTS



Whose award is it?

Grants and contracts are awarded to the Institution, not to individual Principal Investigators (PIs). When a PI's affiliation with the Institution dissolves, the Institution has the option to retain, relinquish or terminate the award with the Sponsor.

Retain Award

Courtesy Appointment

Departing Researcher remains on the project as PI for the Institution with a courtesy appointment approved by their department. The intent is for the PI to oversee research activity performed by other personnel.

New PI Assignment

Departing Researcher does not maintain PI status at Institution; Department Chair or Dean must name a replacement PI for the award. If the project has an assigned Co-PI, that would be the first option; if no Co-PI, then the Department Chair will need to find another qualified PI. Change in key personnel status typically requires prior approval from the Sponsor.

New Subaward

Departing Researcher intends to continue to collaborate on the project as a sub-awardee Co-PI from their new Institution. Departing PI cannot be the PI on the Institution's award and PI on sub-award to the new Institution. A new PI assignment must occur prior to sub-award being issued.

Relinquish and Transfer Award

Determine Procedures

Varies depending on Sponsor and award type. Sponsor Program Officer and Contractual Officer will need to provide direction and approval prior to transfer.

Determine Final Balance

Close out requisitions/purchase orders and ensure all expenditures are finalized. Remaining balance will be the amount that is transferred to the new Institution.

Relinquishment

Release award and Sponsor obligation. Award to the new Institution cannot be issued until the original award is relinquished.

New Institution Proposal

New Institution's responsibility and is the basis of their award.

Terminate Award

Determine Final Balance

Close out requisitions/purchase orders and ensure all expenditures are finalized.

Relinquishment

Release award and Sponsor obligation.

PROPERTY

What is considered property?

Defined by CFR 200.33: Equipment and 200.94: Supplies. The Institution, not the PI, is the custodian of all property and has the option to retain, relinquish or dispose of property. Consideration of title to property may vary depending on acquisition.



Retain Property

Titled Capital Equipment

Property that is titled to the Sponsor must remain with the location of the sponsored project.

New Location

Property that is transferring within the Institution should be cataloged to new lab or facility.

Relinquish and Transfer Property

Titled Capital Equipment

Property can be acquired through a variety of funding sources, and as such, title to property must be evaluated prior to relinquishment.

Value

Consideration should be made to the depreciated value of the item.

Transfer Agreement

Current Institution and new Institution must agree on price, moving costs, liability and other details as it relates to the transfer of title of identified property.

Discard Property

Surplus

Item has potential alternative use within the Institution or resale to the public.

Dispose

Item is no longer operational or suitable for reuse.



When do you get involved?

The transfer process is coordinated through several units and authorized officials. Various offices, units, and individuals contribute to the process depending on their role, the Institution's policies and decisions made regarding sponsored projects and lab facilities.

Departing Researcher

Principal Investigator, Co-Investigators, or Key Personnel who have established lab facilities and/or whose departure from their current Institution would have significant impact on the continuation of a sponsored research project. As the primary person responsible for a lab or research activity, they must notify the appropriate officials to begin the transfer process. Departing Researcher's involvement in the decisions made to sponsored projects, property and other considerations is required throughout the process.

Department Unit

Department Administrators coordinate the transfer activity between the Departing Researcher and other applicable units. Dean and/or Chair approvals are obtained per Institutional policy.

Central Administration

Research Administration Office and Sponsored Projects Accounting Office are the authorized officials for the Institution as it regards contractual and financial obligations. These offices coordinate with the Sponsor, as necessary, for any final determinations made in relation to a sponsored project.

Compliance

Offices that are responsible for Environmental Health and Safety, IACUC, Animal Use, IRB, and Export Control must be notified for the proper closure of protocols to ensure safety and compliance.

Other Units

Units specific to certain actions and decisions such as property, technology transfer and human resources become involved as it is applicable to the Departing Researcher's active projects and facilities.

Sponsor and New Institution

The Sponsor must be contacted for initial direction and approval for decisions regarding sponsored projects. Responsibility of Sponsor requirements transfers to the new Institution once the award is relinquished.

Why is this important?

Several other considerations must be made regarding the Departing Researcher's affiliation with the Institution. Usually this is in respect to the Institution's compliance policies and procedures, as well as federal regulations.



Animal and Human Research

Protocols associated with the Departing PI's research need to be updated to ensure compliance with IRB and IACUC regulations. For animal research, all remaining animals must be transferred in accordance with Institutional procedures or otherwise disposed of in accordance with established protocol.

Environmental Health & Safety

Laboratory facilities should be appropriately cleared of all hazardous materials (biological, chemical and radiological materials). Any item used in conjunction with hazardous materials must be decontaminated prior to transfer or disposal.

Export Control

Authorized officials need to evaluate all export control matters to ensure compliance with Federal Export Control regulations. This includes inventory of export controlled materials and Active Technology Control Plans (TCPs), which will need to be updated or closed out. Government export authorizations are written for specific participants and specific scopes of work and can only be transferred under certain conditions.

Intellectual Property

All Intellectual Property (IP) created by the Departing Researcher during his/her time as an employee of the Institution must be disclosed to the Technology Transfer Office (TTO) so they can manage the Institution-owned IP going forward. If the Departing Researcher or new Institution wants to use Institution-owned IP, TTO can assist with establishing the proper licenses or contracts to govern the use of the IP.

Personnel

Personnel actions should be completed in accordance with the Institution's human resources policies and procedures. All personnel appointments and project assignments working under the direction of the Departing Researcher need to be modified in accordance with continuation of effort determinations.

Other Contractual Obligations

Any agreements executed on behalf of the Departing Researcher need to be evaluated to determine if the agreement should be terminated, transferred or modified.

ROLES & RESPONSIBILITIES

COMPLIANCE & OTHER CONSIDERATIONS