

This step-by-step checklist covers a full range of considerations when a CU Boulder Principal Investigator (PI) decides to dissolve or temporarily change their affiliation with CU Boulder. Not all areas will be applicable to every situation. Reference the full PI Departure from CU Procedural Statement for more details.

The diagram below provides a broad overview of PI transfer considerations. You will find detailed items in the checklist that correspond to the Sponsored Projects, Property and Compliance sections below.

## **ROLES & RESPONSIBILITIES**

Various offices, units, and individuals contribute to the transfer process depending on their role, the Institution's policies and decisions made regarding Sponsored projects and lab facilities.

- Departing PI
- Department Unit (Administrators, Dean and/or Chair)
  - Central Administration (OCG & Campus Controller's Office)
- Compliance Units (EH&S, IACUC, OAR, IRB, Export Controls, etc.)
- Other Units (Property, Venture Partners at CU Boulder, Human Resources, etc.)
- Sponsor
- New Institution

# SPONSORED PROJECTS

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
- New PI Assignment
- New Subagreement

## Relinquish & Transfer Award

- Determine Procedures
- Determine Final Balance
- Relinquishment
- New Institution Proposal

## **Terminate Award**

- Determine Final Balance
- Relinguishment

## **COMPLIANCE**

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

#### Considerations include:

- Animal and/or Human Research
- Environmental Health & Safety
- Export Controls
- Intellectual Property
- Personnel Actions
- Other Contractual Obligations

### **PROPERTY**

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.

#### **Property includes:**

- Capital equipment
- Non-capital property, including laptops
- Supplies

## **Considerations:**

- Titled
- Value
- Transfer Agreement
- Surplus
- Dispose

(✔)	Checklist Item	Responsibility	Point(s) of Contact	
	Start Here: These items apply to all Departing Pls with Sponsored project awards and/or proposals			
	Complete Web Submission Form.  Notifies applicable Research Administration Offices that Researcher is departing CU.	Departing PI or designated DRA	Office of Contracts & Grants Grant or Contract Officer	
	Determine if <b>proposals</b> currently under consideration by a Sponsor need to be transferred to New Institution.	Departing PI or designated DRA	Office of Contracts & Grants Proposal Analyst assigned to department can assist with determinations, as needed	
	Complete and submit all <b>reports</b> up to the date of transfer.	Departing PI or designated DRA	Office of Contracts & Grants Compliance Team ocgcompliance@colorado.edu	
	Complete <b>Effort Certification</b> and certification for all direct reports, for all reporting periods required, prior to Departure Date.  This may be ongoing for all projects where Departing PI has a Courtesy Appointment.	Departing PI or designated DRA	Campus Controller's Office epers@colorado.edu	
	Coordinate with Area Accounting to ensure proper and accurate:     Reconciliation of accounts and expenditures (including subs)     Completion of financial reports     Closeout of awards	Departing PI or designated DRA	Campus Controller's Office  accounting@Colorado.EDU  Routed to assigned Area Accountant  Office of Contracts & Grants Compliance Team  ocgcompliance@colorado.edu  Office of Contracts & Grants Contract, Grant and/or Subcontract Officers as needed	
	Work with <b>Subcontract Officer</b> for awards that contain subs to ensure proper de-obligations and closeouts are complete.	Departing PI or designated DRA	Office of Contracts & Grants Subcontract Officer assigned to department	
	Work with <b>Campus Controller's Office Cost Share Accountant</b> to reconcile accounts, cost share obligations and certify to Sponsor.	Departing PI or designated DRA	Campus Controller's Office Cost Share Accountant accounting@colorado.edu	
	Reconcile infoED record	OCG	Office of Contracts & Grants Contract, Grant and/or Subcontract Officers	

(✓)	Checklist Item	Responsibility	Point(s) of Contact	
	RETENTION OF AWARD (These items apply when the award stays at CU Boulder)			
	Subject to Department Chair/Dean's approval, obtain <b>Courtesy Appointment</b> if Departing PI is to remain on award as CU's PI.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Proposal Analyst, Contract Officer, Grant Officer and Subcontract Officer for department	
	As applicable, Department Chair needs to name a replacement CU PI if the award is remaining at CU and the Departing PI will not remain as CU PI (may be subject to Sponsor approval).	Department Chair / Dean		

	<ul> <li>If Departing PI will continue work as Sub Co-PI:         <ul> <li>Gain Sponsor approval and submit the request for an outgoing subagreement.</li> </ul> </li> <li>NOTICE: Departing PI cannot be the PI on the CU Award and PI on subagreement to the New Institution.</li> <li>Obtain the necessary subrecipient/transfer documentation.</li> <li>Forward to OCG for review and submission to the Sponsor.</li> </ul> <li>Newly assigned CU Boulder PI and DRA will need to coordinate with OCG Proposal Analyst and Grant/Contract Officer to initiate</li>	OCG Proposal Analyst, Grant, Contract & Subcontract Officers  Departing PI or designated DRA  Departing PI or designated DRA	Campus Controller's Office accounting@colorado.edu  Departing Pl's New Institution
	the sub process, including revision to the prime budget.  Departing PI should coordinate with New Institution to create required subagreement proposal documents.	Departing PI or designated DRA	
	RELINQUISHMENT OF AWARD (These items apply wh	en the award transfer	s to the New Institution)
	<b>Determine if award is eligible for transfer</b> to another institution per the Sponsor's policies and/or terms and conditions.	OCG Grant / Contract Officers	Office of Contracts & Grants Assigned Contract Officer or
	<b>Gain all approvals</b> from both institutions, as applicable, including Department Chair/Dean, Institute/Center Directors, and OCG.	Departing PI or designated DRA	Grant Officer for department
	Prepare the necessary <b>transfer documentation</b> .  • Forward to OCG for review and submission to the Sponsor.  NOTICE: Once the award has been terminated, standard closeout procedures will be initiated (including signed relinquishment letter from Department Chair/Dean once final balance is determined).	Departing PI or designated DRA	Campus Controller's Office accounting@colorado.edu  Departing Pl's New Institution
	Deobligate and closeout all subagreements.	Departing PI or designated DRA	Office of Contracts and Grants Assigned Subcontract Officer
	Determine if all reporting requirements have been met. For example: Annual and final technical reports.	Departing PI	Office of Contracts and Grants Assigned Compliance Officer
	Departing PI must coordinate with their New Institution to <b>prepare</b> and submit any required proposal documents associated with the award that the New Institution will be receiving.	Departing PI or designated DRA	Assigned Compliance Officer
	TERMINATION OF AWARD (These items apply when no	transfer is applicable)	
	<b>Determine the final balance of the award</b> with Area Accounting <b>NOTICE:</b> The same cost categories as detailed in the Relinquishment of Award should be considered.	Departing PI or designated DRA	Campus Controller's Office accounting@colorado.edu
	Once final balance has been determined, work with OCG Grant or Contract Officer assigned to the Department to <a href="complete internal relinquishment letter">complete internal relinquishment letter</a> with Departing PI and Department Chair/Director signature.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Contract Officer or Grant Officer for department
	OCG Grant/Contract Officer will work with Sponsor to obtain formal relinquishment of the award.	OCG Grant / Contract Officers	
(🗸)	Checklist Item	Responsibility	Point(s) of Contact

## **TERMINATION OF AWARD - CONTINUED**

	Once the Award has been terminated, standard closeout procedures will be initiated.  Departing PI is responsible for all deliverables required up to the date of award termination.	Departing PI or designated DRA OCG Grant / Contract Officers	OCG Compliance Team Ocgcomplinace@colorado.edu	
	CONSIDERATIONS FOR LABS/FACILITIES (CU B			
	Complete the forms and actions identified in this section if Departing I any CU Boulder property, other equipment or supplies.	PI is responsible for a	lab/facility or would like to transfer	
	Complete List of Tagged Fixed Assets and/or Untagged Non-Consumable Property Form for tagged equipment and/or untagged non-consumable property.  Complete List of Untagged Consumable Material and/or Supplies Form for all other items in the lab.  Have Department Chair or Institute Director sign the forms.  Submit to OCG Property and EH&S.	Departing PI or designated DRA	Office of Contracts & Grants Property Compliance Officer ocgproperty@colorado.edu  And CCO property@colorado.edu Environmental Health & Safety EHSbio@colorado.edu EHS@colorado.edu	
	Work with OCG Compliance Officer to determine if equipment is eligible for disposal or for transfer internally or externally.  NOTICE: Approval from Sponsor may be needed prior to disposal or transfer of items.	Department Chair OCG Property Officer	Office of Contracts & Grants Compliance Officer ocgproperty@colorado.edu	
	Complete the forms and actions identified in this section if Departing PI has any CU Discoveries or would like to transfer Tangible Research Materials to New Institution.			
	Complete an inventory of all Tangible Research Materials and CU Discoveries using the Tangible Research Materials and CU Discoveries Form.  Submit a copy to OCG Contract Administrator and Environmental Health & Safety.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Contract Administrator for department ocgcontracts@colorado.edu	
	Items obtained elsewhere: CU may need to terminate or transfer contractual responsibilities to New Institution.  Items developed solely at CU: Work with OCG Contract Administrator to execute MTA between CU and New Institution.	Departing PI or designated DRA OCG Contract Administrator	Environmental Health & Safety  EHSbio@colorado.edu  EHS@colorado.edu	
	ENVIRONMENTAL HEALTH & SAFETY/BIOSAF	<b>FETY</b> (Laboratory C	loseout)	
	Work with EH&S to begin the Laboratory Closeout Process.	Departing PI or	Environmental Health & Safety	
	Close out any active IBC, RAD protocols or applications	designated DRA	EHSbio@colorado.edu	
	As needed, work with Biosafety and ChemSafety to ensure proper transfer or destruction of material(s).  NOTICE: May require an MTA – see Tangible Research Materials transfer steps in the previous section.  Read Lab Closure and Decommissioning Instructions and		EHS@colorado.edu  Office of Contracts & Grants Assigned Contract Administrator for department	
	complete EH&S Laboratory Decommissioning Checklist		ocgcontracts@colorado.edu	
(✔)	Checklist Item	Responsibility	Point(s) of Contact	

	EXPORT CONTROL		
	Departing PI must <b>sign Export Control Exit Certification</b> stating they will not distribute controlled devices, software, and/or information.  Any electronic devices need to be wiped/cleared.	Department Chair	Export Controls Office  OEC-OCG@colorado.edu
	Departing Pls with Active Licenses		
	Work with Export Control Office to arrange for transfer of active protocols to another investigator at CU Boulder, <i>or</i>	Departing PI or designated DRA	
	Close the protocol, or		
	Arrange for resubmittal of license application under New Institution registration.		
	Departing Pls with Technology Control Plans		
	Arrange for transfer of active protocols to another investigator at CU, or	Departing PI or designated DRA	
	Close the protocol		
	ANIMAL SUBJECTS		
	Disposition of Protocol		
	Arrange for transfer of active protocols to another investigator at CU, or	Departing PI or designated DRA	IACUC iacucoffice@colorado.edu
	Close the protocol, or		
	Arrange for review/approval of the protocol at New Institution		
	Disposition of Animals		
	Arrange for transfer of animals to another CU PI / protocol, or	Departing PI or designated DRA	Office of Animal Resources oaroffice@colorado.edu
	Arrange for transfer of animals to another institution. <b>NOTICE:</b> May require an MTA – see Tangible Research Materials transfer steps in the previous section.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Contract Administrator for department <a href="mailto:ocgcontracts@colorado.edu">ocgcontracts@colorado.edu</a>
	HUMAN SUBJECTS		
	Work with CU Boulder's IRB to discuss transition plan with regard to management of human research projects.	Departing PI or designated DRA	CU Boulder Institutional Review Board (IRB)
	Termination of the Project		irbadmin@colorado.edu
	Departing PI may choose to terminate the protocol if work on the project is completed or the research project is not to be continued.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Grant Officer,
1	Transition of Project to New CU Boulder Researcher		Contract Officer or Contract Administrator for department
	If research (enrollment, follow-up, or analysis) is ongoing at CU Boulder, Departing PI or Department Chair/Dean will need to assign new CU Researcher.	Departing PI or designated DRA	Office of Contracts & Grants Compliance Team ocgcompliance@colorado.edu
(√)	Checklist Item	Responsibility	Point(s) of Contact

Transition of Project to New CU Boulder Researcher - Continued		
<ul> <li>If Departing PI plans to stay on as a collaborator:</li> <li>Secure new human subject research approval at New Institution or obtain additional consent of the subject, dependent on scope of work.</li> <li>Work with CU IRB and OCG to determine if additional agreements (such as data use agreements, tissue transfer agreements, etc.) are needed between CU Boulder and the New Institution.</li> <li>NOTICE: Any data or human tissue samples that Departing PI plans to transfer must be listed on the Tangible Research Materials and CU Discoveries List.</li> </ul>	Departing PI or designated DRA	CU Boulder Institutional Review Board (IRB)  irbadmin@colorado.edu  Office of Contracts & Grants  Assigned Grant Officer,  Contract Officer or Contract  Administrator for department
PERSONNEL ACTIONS		
Complete Human Resource Exit Checklist  If applicable, set up temporary 0% appointment.	Departing PI or designated DRA	
INTELLECTUAL PROPERTY		
<ul> <li>Work with Venture Partners to ensure that all matters related to CU discoveries and Intellectual Property are resolved. These include:         <ul> <li>Disclosing all discoveries in accordance with the Regent Policy 5J and APS1013 policies</li> <li>Executing all outstanding patent related documents such as assignments and declarations</li> <li>If departing PI has any active inventions on file with Venture Partners, provide an updated e-mail address and contact information for future correspondence to vpcontact@colorado.edu</li> </ul> </li> <li>Sign acknowledgement statement that Departing PI has disclosed to Venture Partners at CU Boulder all Discoveries, including all inventions and software programs, required under CU IP policy through their end-date.</li> <li>Provide copy to OCG Compliance.</li> </ul>	Departing PI or designated DRA	Venture Partners at CU Boulder vpcontact@colorado.edu  Office of Contracts and Grants IP Legal Counsel  Office of Contracts & Grants Compliance Team ocgcompliance@colorado.edu
OTHER CONTRACTUAL OBLIGATIONS		
Terminate or transfer responsibilities for other contractual obligations to the New Institution. (e.g. no cost collaborations, bailment agreements, data use agreements, non-disclosure agreements)  Inform Sponsor of the change and inform OCG of agreed upon plans.	Departing PI or designated DRA	Office of Contracts & Grants Assigned Contract Officer for department
Notify Facility Security Officer (FSO) in OCG if CU holds an active security clearance for Departing PI.	Departing PI or designated DRA	Office of Contracts & Grants FSO or Assistant FSO

## **Glossary of Terms**

**Departing PI** referenced in this document includes any faculty or staff engaging in sponsored projects in a Key Personnel role that plans to dissolve their affiliation with CU Boulder. This term is not limited to just the named Principal Investigators on a sponsored project.

**Courtesy Appointment** is an appointment for a PI who has awards staying at CU Boulder to support students, Research Associates or Professional Research Assistants. Typically a 0% appointment receiving no salary.

**Property** includes all items acquired under a Sponsored project, such as: supplies, materials, capital and non-capital equipment, computers, and electronic devices.

**CU Discoveries** means any inventive idea and/or its reduction to practice which relates to, but is not limited to: new processes or methods of producing a new and useful industrial result; any composition of matter, including chemical and biological compounds; any new devices; any new plant; any new design in connection with the production or manufacture of an article; any new computer hardware and/or software programs; any know-how supporting these inventive ideas, systems, devices, compositions, programs or processes; and any new use or improvement of existing systems, devices, compositions, programs, or processes.

**Tangible Research Property** means a tangible physical or biological entity that is, or may be, useful in research. Examples include models, devices, designs, avatars, computer software, storage media containing machine instructions, text, tissues, serum, fluids, organs, cell lines, antibodies, recombinant materials, chemical compounds and compositions, formulations, plant varieties, laboratory notebooks, clinical information, records, and data related to discoveries. Tangible Research Property does not include Intellectual Property that is considered Educational Material (Regent Policy 5k).