PI Transfer Procedures for Sponsored Awards



The transfer of a sponsored award from one institution to another can be a complicated and time-consuming action. This guidance seeks to streamline the steps and considerations for transferring a sponsored award to (incoming) or from (outgoing) CSU.

Sponsored awards, such as grants, cooperative agreements, and contracts, are awarded to institutions and organizations, not to the Principal Investigator (PI). When a PI changes institutions or organizations, the awardee organization will determine whether it will retain, transfer, or terminate the award. CSU must approve the acceptance or relinquishment of the award and associated equipment. The sponsoring agency must also approve all award transfers.

Incoming Awards

Investigators coming to CSU with an active award should coordinate with their previous institution and their new CSU departmental/unit/college support staff on the proposal that CSU will need to submit to the sponsoring organization for the project awarded to be issued to CSU. The previous institution must relinquish its award so it can be issued to CSU or be granted permission from the sponsoring organization to issue a new subaward to CSU. Before a CSU account can be created, the newly issued award or new subaward needs to be reviewed, possibly negotiated, and accepted by an official Office of Sponsored Programs representative and internal CSU documents (as applicable) such as COI, cost-sharing, and compliance protocols need to be finalized.

If the new CSU investigator will be bringing equipment to CSU, they will need to 1) work with their old institution's Sponsored Programs and Property Management groups to get any required approvals for transferring the equipment to CSU, and 2) work with their department/unit/college property manager to get the incoming equipment properly recorded in CSU's property management system.

Outgoing Awards

To initiate a transfer, CSU must submit a transfer request to the sponsoring agency using the process defined by the sponsor. If the sponsor approves the request, the sponsor will begin the process of closing out the award at CSU. Simultaneously, the new awardee organization will submit a proposal to the sponsor for the remaining funds. After completing both the closeout and proposal review, the sponsor will issue a new award to the new organization. This process can take 2-3 months or more depending on the sponsor, so it is important to initiate the request well in advance of the new expected start date.

CSU Award Transfer Procedures

If the PI leaves the institution and has an active sponsored award, the award action will fall into one of four categories:

- CSU will work with the sponsoring agency to relinquish the award so that the sponsoring agency can reissue it to the new institution.
- CSU will assign a new PI to take over the project, with the consent of the sponsoring agency.
- CSU will assign a new PI to take over the project, with the consent of the sponsoring agency, and issue a subaward, approved by the sponsoring agency, to the transferring PI's new institution.
- The project will close, and the PI must complete all reporting requirements including any technical, intellectual property, equipment, COI and effort reporting requirements. (Note: Federal contracts are generally not transferable but may be terminated and re-issued to a new institution/organization.)

Investigators leaving CSU with an active award should consult their cognizant department chair or equivalent to ensure that the unit is willing and able to relinquish the award. Investigators should also meet with their unit Fiscal Officer and the Office of Sponsored Programs Team to ensure all sponsor obligations have been met and to initiate the approved transfer. As a reminder, the sponsoring agency will have to approve the transfer.

If it is determined that an award will be transferred, the following actions should occur:

- 1. All spending on the award should cease as soon as possible.
- 2. The PI should complete the attached Exit Checklist. The checklist must be completed before the OSP can submit a transfer request to the sponsor.
- 3. For sponsors that require a letter of request, the OSP will prepare the letter and an authorized CSU official will sign on behalf of the Institution. The relinquishment letter shall contain:
 - The sponsor's award number
 - The effective date of relinquishment
 - A statement of intent concerning the transfer of equipment

PI Transfer Checklist for Sponsored Awards

This checklist is for use by Principal Investigators (PIs) who are transferring from CSU to another institution or organization. The checklist is to be used in coordination with the PI's department chair or equivalent, the unit's fiscal officer, the Office of Sponsored Programs (OSP), and other units as identified under areas of 'Responsibility'.

PI Transfer Considerations

In addition to the PI checklist, the following factors should be considered as part of the PI transfer process.

- 1. Will the project be transferred, or will a new PI be named at the CSU?
- 2. If project staff members remain at CSU, will there be a new subaward issued back to the CSU from the new institution?
- 3. Will any related project staff members, such as graduate students, transfer to the new institution with the PI?
- 4. Are there subawards on the current award? All active subawards will need to be closed out before the transfer (*Note: Closeout of a subaward requires the receipt of an invoice from the subrecipient marked 'Fina' and any other required reports or deliverables.*)
- 5. What will be the relinquishment date? (Generally, this is the last day of the PI at the University and cannot be any later than the PI's last day of employment at CSU.)
- 6. What is the unobligated balance to be transferred to the new institution? This is the amount unspent/unencumbered at the relinquishment date and may involve some estimates by the PI. This number must be determined accurately, as it must be submitted to the sponsoring agency at the time the transfer is requested and any additional spending beyond the amount indicated to the sponsor will cause problems with the transfer because that amount is what the new institution will use in creating their budget for the new award that the sponsor will issue to them. This amount should be verified by the department or unit and communicated to OSP. All expenditures must be posted to the account by the relinquishment date. Any expenditures beyond the unspent/unencumbered amount reported to the sponsoring agency will likely have to be covered by the PI's unit.

- 7. Are there any cost-sharing obligations under the award? If so, have they been met in accordance with the terms and conditions (e.g. the prorated amount up to the relinquishment date)?
- 8. Is there any equipment associated with this award that is to be transferred to the new institution or sold? If transferred, the Department Head may need to sign a Letter of Release and the new institution may need to sign a Letter of Acceptance. Additionally, the terms of the sponsored project must be abided by to determine if the property can be transferred or sold to the institution or if sponsor approval must be obtained. If sold, Surplus Property would arrange for the sale of the equipment and the 5-3 account, if still active, may need to be reimbursed. Refer to FPI 4-5 (Capital and Non-Capital Equipment Inventory) and the Property and Plant Manual on the BFS website at http://busfin.colostate.edu/Resources/Fin Rules Procs.aspx
- 9. Are there any compliance protocols (IRB, IACUC, IBC, etc.) to close out? Contact the appropriate unit.
- 10. Is there a lab to be closed that includes the disposal of chemicals, biological materials, etc.? Contact Environmental Health Services.
- 11. Has there been any intellectual property developed? If so, <u>CSU Strata</u> needs to be notified.

Area	Exit Checklist	√	Party/Parties Involved
Commitments -Technical reports -Cost share -Balances -Intellectual Property	Work with department/unit and OSP to ensure all final technical and financial reports are submitted to the sponsor; ensure all cost share obligations have been met and that unobligated balances to be transferred have been verified by the department, and that any required final Intellectual Property reports have been submitted.		PI Department/Unit OSP
Assigned -Staff -Students	Work with Department Chair or equivalent to develop a proposed transition plan for assigned staff, students		PI
	The plan should address the following:		
	-Transfer of staff/students to another eligible CSU Investigator and how salaries will be paid, or		PI/Chair and Human Resources
	-Follow procedures to discontinue the employment of staff and student employees		OSP Chair
	-Determine how sponsored projects will be handled, e.g. terminated, transferred, etc.		
	-Turn in/transfer lab keys; computers; office equipment, etc.		
Property/ Equipment	Arrange for the transfer, retirement, or sale of any equipment that was purchased on the award,		PI
	complying with the award terms and conditions.		Department/Unit
			Property Management (under BFS)
			OSP

	Surplus property must be contacted, and the	Surplus Property
	Asset/Retirement/Disposal Instructions and	
	Authorization Request Form should be completed	
	For transfer, a Letter of Release signed by the	PI/Chair
	department head and a Letter of Acceptance from	New Institution
	the accepting agency	
Chemical Safety	Arrange for lab closeout and transfer of chemicals	PI and Environmental
	including controlled substances per CSU and	Health Services (EHS)
	federal policy	
Radiation Safety	Arrange for the transfer of materials, sources,	PI and Environmental
	and/or equipment to another eligible CSU	Health & Safety (EHS)
	Investigator (or other licensed facilities) with an	
	approved permit or arrange for disposal per CSU	
	policy, and	
	Decommission the work area	
Biosafety	Arrange for the transfer of active protocols to	PI and Biosafety Office
	another eligible CSU Investigator (transfer requires	
	IBC review and approval), or	
	Destroy biological materials safely, and/or arrange	PI and Environmental
	for an audit by EHS/BSO	Health & Safety (EHS)
	Close the protocol	
Human Subjects	Arrange for the transfer of active protocols to	PI and the <u>Institutional</u>
	another eligible CSU Investigator, or	Review Board
	Close the protocol, or	
	Arrange for review/approval of the protocol at the new institution	
Animal Subjects	1. Disposition of Protocol	PI and the Office of
	-Arrange for the transfer of active animal protocols to	Research Collaboration
	another eligible CSU investigator, or	and Compliance
	-Close the protocol, or	
	-Arrange for review/approval of the protocol at new institution	
	2. Disposition of Animals	
	-Arrange for the transfer of animals to another eligible CSU Pl/protocol, or	
	-Arrange for the physical transfer of animals to another Institution, or	
	-Arrange for humane euthanasia of animals with IACUC approval	