



Incoming/Outgoing Key Person Procedures for Sponsored Awards

The transfer of an investigator and their portfolio 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 for any key personnel on a project (i.e. PI, Co-PI, Sr./Key Personnel).

Sponsored awards, such as grants, cooperative agreements, and contracts, are awarded to institutions and organizations, not to the Principal Investigator (PI). When an investigator 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 Key Person Actions

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. That submission follows standard CSU [proposal submission guidance and timelines](#), including the routing of a KRPD record. 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. Internal CSU documents (as applicable) such as COI, cost-sharing, and compliance protocols need to be finalized.

If the new CSU investigator will bring equipment to CSU, they will need to 1) work with their old institution's Sponsored Programs and Property Management groups to obtain any required approvals for transferring the equipment to CSU, and 2) work with their department/unit/college property manager, CSU Property Management, and OSP to properly record title (Sponsor, Federal, CSU-Conditional, CSU-Unconditional) to any incoming equipment and, if necessary, to associate it with the sponsored project if title is not CSU-unconditional.

Outgoing Key Person Actions

When an Investigator is leaving CSU the steps below should be taken. Please note that the exact considerations and plan may depend on the role (PI, co-PI, Sr. Key Personnel etc.) of the Investigator on each project in their portfolio.

1. **Determine the plan:** Investigators leaving CSU with an active award should consult their Fiscal Officer and cognizant department chair or equivalent to determine the disposition plan (see below for options).
2. **Spending:** If an Investigator leaving CSU has the role of Principal Investigator (PI) on a project and it is determined that an award will be transferred with them, all spending on the award should cease as soon as possible so that all final expenditures can post in preparation of the closeout transfer.
3. **Communicate the plan and document approvals:** To obtain all necessary approvals, PI or DRA must complete the ['Key Person Transfer Out' form in Quali Build](#). This form will then route to OSP FRA before routing to Department and College approvers for sign off before coming to SRA for final review and next steps.
4. **Implement the plan:** Once the plan has been approved, the OSP SRA will track the disposition via a KR Negotiations record and work with the Key person and Department Administrators to implement the disposition plan, ensure all sponsor approvals obtained, and all sponsor obligations have been met.

Disposition Plan Options:

If a Key Person leaves the institution and has an active sponsored award, the following disposition actions will be considered:

- No action: The commitment is complete and awaiting final financial and administrative closeout at CSU
- Complete project before leaving CSU: The project will be completed, and the Outgoing Key Person must ensure final costs will post and complete all reporting requirements including any technical, intellectual property, equipment, effort reporting, or other requirements.
- Assign new CSU PI/Key Person: The project will remain at CSU and CSU will assign a new PI or other Key Person to take over the project, with the consent of the sponsoring agency. There is no future involvement of the outgoing Key Person on the project.
- Assign new CSU PI, Subaward to new Institution: CSU will assign a new PI to take over the project, and issue a subaward, approved by the sponsoring agency, to the transferring PI's new institution.
- No new CSU PI, Subaward to new Institution: In the case of a Co-PI transfer, the CSU PI will remain the same and CSU will issue a subaward, approved by the sponsoring agency, to the transferring Co-PI's new institution.
- Other: Certain agreements may require different actions than those defined here. As an example, Federal contracts are generally not transferable but may be terminated and re-issued to a new institution/organization. In those cases, the project is not complete, but will close at CSU. CSU will work with the sponsoring agency to relinquish the award so that the sponsoring agency can reissue it to the new institution. The Outgoing Key Person must still ensure final costs will post and complete all reporting requirements including any technical, intellectual property, equipment, effort reporting, or other requirements.

Outgoing Key Person Additional Information and Considerations

To determine the disposition plan, consider the following:

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?

Items to determine when an award is to transfer organizations:

1. 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 'Final' and any other required reports or deliverables defined in the subagreement.*)
2. 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.*)
3. 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.
4. 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)?

5. 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
6. Are there any compliance protocols (IRB, IACUC, IBC, etc.) to close out? Contact the appropriate unit.
7. Is there a lab to be closed that includes the disposal of chemicals, biological materials, etc.? Contact [Environmental Health Services](#).
8. Has there been any intellectual property developed? If so, [CSU Strata](#) needs to be notified.
9. Has OSP been provided a copy of the programmatic reports? In accordance with [CSU](#) and federal policies ([2 CFR 200.334](#)), CSU must retain all documents pertinent to the federal award, including programmatic reports.
10. Consider data and lab notebooks generated by the key person while at CSU. CSU, not the Key Person, owns research data and lab notebooks generated under sponsored projects, and sponsors require the **original institution** to retain all original data and notebooks for a period after closeout. If a key person is leaving CSU must retain **original data** for records retention and audit purposes. Typically, investigators may take copies of research data necessary to continue the project at the new institution. In addition, depending on project type, data might require:
 - a. IRB approval before transfer
 - b. Amendment to the IRB protocol
 - c. Updated consent language for future use
 - d. Export control review
 - e. Data use or data transfer agreements
 - f. If students are involved, also consider FERPA requirements, co-authorship rights, Advisor/committee approval for thesis-related research

Award Transfer Timeline

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.

Outgoing Key Person Checklist for Sponsored Awards

Each sponsored award is unique. This checklist can be used as a baseline list of possible actions needed when a Key Person and an award is transferring from CSU to another institution or organization. The checklist is to be used in coordination with the Key Person'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'.

Area	Exit Checklist	√	Party/Parties Involved
Commitments -Technical reports - Final costs - Effort Certifications -Cost share -Balances -Intellectual Property	Work with department/unit and OSP to ensure all final technical and financial reports are submitted to the sponsor with a copy of technical reports provided to OSP; ensure final effort certifications have been made; 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		
	-Determine how sponsored projects will be handled, e.g. terminated, transferred, etc.		OSP
	-Turn in/transfer lab keys; computers; office equipment, etc.		Chair
Property/ Equipment	Arrange for the transfer, retirement, or sale of any equipment that was purchased on the award, complying with the award terms and conditions.		PI Department/Unit Property Management (under BFS) OSP
	Surplus property must be contacted, and the Asset/Retirement/Disposal Instructions and Authorization Request Form should be completed		Surplus Property
	For transfer, a Letter of Release signed by the department head and a Letter of Acceptance from the accepting agency		PI/Chair New Institution
Chemical Safety	Arrange for lab closeout and transfer of chemicals including controlled substances per CSU and federal policy		PI and Environmental Health Services (EHS)

Radiation Safety	Arrange for the transfer of materials, sources, and/or equipment to another eligible CSU Investigator (or other licensed facilities) with an approved permit or arrange for disposal per CSU policy, and		PI and Environmental Health & Safety (EHS)
	Decommission the work area		
Biosafety	Arrange for the transfer of active protocols to another eligible CSU Investigator (transfer requires IBC review and approval), or		PI and Biosafety Office
	Destroy biological materials safely, and/or arrange for an audit by EHS/BSO		PI and Environmental Health & Safety (EHS)
	Close the protocol		
Human Subjects	Arrange for the transfer of active protocols to another eligible CSU Investigator, or		PI and the Institutional 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 Research Collaboration and Compliance
	-Arrange for the transfer of active animal protocols to another eligible CSU investigator, or		
	-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 PI/protocol, or		
	-Arrange for the physical transfer of animals to another Institution, or		
	-Arrange for humane euthanasia of animals with IACUC approval		