



Department Administrative Policy and Procedures

Subject: **PI/Award Transfer to Another Institution**

Effective Date: **June 1, 2020**

I. PURPOSE

The purpose of this policy is to provide guidance on University of Wyoming (“University”) and Federal standards and procedures for faculty transferring sponsored projects when departing the University for another institution.

II. DEFINITIONS

The transfer of an award from one institution to another can be a time-consuming action. In order to minimize this, a number of potential issues should be addressed prior to the transfer.

A. Relinquishment of Federal Awards

Federal grants and contracts are awarded to the University, not directly to Principal Investigators (PIs). If a PI changes institutions, the University will determine on a case-by-case basis whether it will retain, transfer, or terminate the award. As the grantee institution, the University must approve the relinquishment of the award and formally relinquish the award and equipment to the PI’s new institution. The awarding agency or sponsor must also approve all grant/contract transfers.

B. Sponsor Approval Process

To initiate a transfer, the University first submits a transfer request using a process defined by each sponsor. If the sponsor approves the request, the sponsor will begin the process of closing out the award at the University. At the same time, the new institution will submit a proposal to the sponsor for the remaining funds. After completing both the closeout and proposal review stages, the sponsor will issue a new award to the new institution. This can take two to three months. It is important to initiate the request well ahead of the expected start date at the new institution.

C. Approval Process Checklist

The following factors should be considered as a part of the process. A more detailed checklist is appended to this procedure.

1. Will the grant be transferred, or will a new PI be named at the University?

2. If there are project staff members remaining at the University, will there be a new subaward issued back to the University from the new institution?
3. Are there subawards on the current award? All active subawards will need to be closed out prior to the transfer (Note: Closeout of a subaward requires the receipt of an invoice from the subawardee marked "Final.")
4. What will be the relinquishment date (generally the last day at the University)?
5. 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 amount will be verified by the Office of Sponsored Programs (OSP).
6. Are there any cost sharing obligations under the award?
7. Has there been any intellectual property developed?
8. Is there any equipment associated with this award that is to be transferred to the new institution (refer to procedure for Transfer of Equipment with Departing Faculty)?
9. Are there any compliance protocols (IRB, IACUC, rDNA, etc.) to close out?
10. Is there a lab to be closed?
11. Will any related project staff members, such as graduate students, transfer to the new institution with the PI?

III. POLICY

A. Procedure for Transferring an Award

1. Stop all spending on the award as soon as is practical.
2. Notify the Office of Research and Economic Development (ORED) as soon as possible.
3. Complete the Exit Checklist (attached). This must be complete before ORED can submit any transfer to the sponsor.
4. For those sponsors that require a letter of request, ORED - Research Services and the authorized official who signs on behalf of the University will prepare on University letterhead a letter addressed to the Sponsor's grants specialist or contracting officer and program manager. The relinquishment letter will contain the following:
 - The sponsor's award number
 - The effective date of the relinquishment

- A statement of intent concerning the transfer of equipment (see UW procedure for Equipment Transfers for Departing Faculty)

5. Repeat this process for all awards to be transferred.

B. Transfer of Contracts

While federal grants are often transferred between institutions based on the relocation of a PI, contracts are generally not transferrable, but instead may be terminated completely and re-issued to a new institution. Sponsors may also require the University to retain the original contract and issue a new subcontract to the PI's new institution. This may also occur on grants and cooperative agreements. The steps outlined above, should be followed regardless of the award type. Questions regarding this process should be directed to ORED.

C. Process for Specific Sponsors

Contact ORED for guidance for specific sponsors.

Responsible Division/Unit: Administration / Office of Research and Economic Development,
Office of Sponsored Programs

Links:

Associated Regulations, Policies, and Forms: UW Principal Investigator Transfer Checklist

University of Wyoming Principal Investigator (PI) Transfer Checklist

This Exit Checklist is intended to serve as an aid for Principal Investigators who are transferring from the University of Wyoming to another institution. This checklist is to be used in coordination with the guidance titled “PI/Award Transfer to Another Institution” available on the Office of Sponsored Programs website. A legend identifying the acronyms used in the Responsibility column is available at the end of this Checklist.

Area	Checklist	✓	Responsibility
Assigned -Staff -Students -Property/ Equipment	Work with Department Head/Director (DH) to develop a proposed transition plan for assigned staff, students and Department Head agrees with or modifies plan		PI & DH
	Plan should address the following:		
	-Transfer of staff/students to another Investigator at UW and how salaries will be paid, or		PI/DH and
	-Follow procedures to discontinue employment of staff and student employees		Human Resources
	-Disposition or transfer of property/equipment (see below)		Property Management (PM)
	- Determine how sponsored program projects will be handled, e.g. terminated, transferred, etc. (see below)		ORED
	- Turn-in/transfer lab keys; computers; office equipment, etc.		DH
Chemical Safety	Arrange for lab closeout and transfer of chemicals including controlled substances per UW and federal policy		PI and Safety Office
Radiation Safety	Arrange for transfer of materials, sources, and/or equipment to another investigator at UW (or other licensed facility) with an approved permit or arrange for disposal per UW policy, and		PI and ORED, Research Integrity and Compliance Office, Radiation Safety Office,
	Decommission the work area		http://www.uwyo.edu/safety/radiation/

Biosafety	Arrange for transfer of active protocols to another investigator at UW (transfer requires IBC review and approval; may not be to an adjunct professor), or		PI and ORED, Research Integrity and Compliance Office, Biological safety Office, http://www.uwyo.edu/safety/biological/
	Destroy biological materials safely, or		
	Close the protocol		
Human Subjects	Arrange for transfer of active protocols to another investigator at UW (transfer may not be to an adjunct professor) , or		PI and ORED, Research Integrity & Compliance Office, https://www.uwyo.edu/research/compliance/human-subjects/index.html
	Close the protocol, or		
	Arrange for review/approval of the protocol at new institution		
Animal Subjects	1. Disposition of Protocol		PI and ORED, Research Integrity & Compliance Office, https://www.uwyo.edu/research/compliance/animal-care/index.html
	-Arrange for transfer of active animal protocols to another investigator at UW (transfer may not be to an adjunct professor), 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 UW PI/protocol, or		
	-Arrange for the transfer of animals to another Institution		

Disposition of Equipment	Contact Property Management office for list of assigned equipment and determine appropriate disposition instructions.		PI
	Determine title to equipment before any disposition or transfer of equipment. Any disposition must be approved using Property Transfer Request Form.		PM
	If new institution is willing to purchase and UW is willing to sell, a fair market value must be determined.		DH
	If transfer of equipment to a new institution is approved by UW, shipping should be arranged and paid by new institution.		PI/UW Operations
	If Equipment is staying on campus; arrange for internal transfer (other PI) or other disposition of equipment and associated maintenance records (if applicable).		PI/DH/ PM
	Check with ORED, Research Integrity & Compliance Office and Safety Office regarding equipment containing, or used to store, chemicals, biological agents, or radioactive materials.		PI/ORED, Research Integrity and Compliance Office
Intellectual Property, Material Transfer Agreements & Data Management	Ensure all IP matters (including copyrights registered or that need to be registered, if any) covered by a patent application or issued patent are resolved.		PI/Technology Transfer and Research Products Center
	Submit IP Disclosure Form for any previously undisclosed intellectual property.		
	Ensure any co-inventions with other institutions are appropriately managed.		
	Terminate or transfer MTA responsibilities to new institution (if materials can be transferred).		ORED, Research Integrity & Compliance Office, Technology Transfer and Research Products Center
	Review and NDAs put into place with Technology Transfer and Research Products Center to assure no further action is necessary.		
Export Controls	Ensure all restricted material currently under a technology control plan is transferred to a new responsible individual or disposed of properly. Notify and/or work with the UW Legal Office.		PI/UW Legal Office

Proposal and Award Management	Notify ORED, Research Services that a PI is departing UW as soon as possible and no later than 90 days in advance of departure.		PI
	Determine the disposition of any pending proposals (for example, withdrawing the UW proposal, and resubmitting the proposal and budget through the new institution)		PI/ORED, Research Services http://www.uwyo.edu/research/proposal-development/
Transfer	If UW agrees to award transfer to new institution, contact Sponsor and coordinate request and timing of award transfer.		PI/ORED, Research Services
	If award will remain at UW until end date, arrange for a change in PI at UW and initiate request for change to Sponsor; or initiate award termination.		DH/ ORED, Research Services
Terminate	Determine what actions will be taken regarding any sub-award (e.g., continue, transfer, terminate).		PI/DH/ ORED, Research Services
	Advise PI and DH regarding Sponsor requirements for award transfer.		ORED, Research Services
Change PI	Ensure salary certification requirements have been met prior to faculty departure from UW.		DH
	Coordinate with Office of Sponsored Programs (OSP) to ensure proper and accurate reconciliation of accounts, completion of financial reports, and close-out of awards.		PI/DH/Office of Sponsored Programs (OSP) https://www.uwyo.edu/administration/financial-affairs/sponsored-programs/
	Coordinate with Asset Management to update custody and/or location of equipment in fixed asset records system.		OSP/Asset Management
	Return unexpended start-up, retention, or other funds to funding source.		DH
	Ensure technical and patent reports are complete and have been submitted prior to faculty departure from UW.		PI/ DH

Other Contractual Commitments	Terminate or transfer responsibilities for other contractual arrangements (e.g. no cost collaborations, equipment loan agreements, data use agreements, non-disclosure agreements) to the move to new institution; inform sponsor of the change and inform ORED, Research Services of agreed upon plans for the disposition.		PI/DH/ORED, Research Services
	Coordinates with other party to amend or terminate agreements as necessary.		ORED, Research Services
Data Retention and Management	Ensures that the PI has developed an inventory of research data and other materials developed while at UW and that UW retains copies of research data developed by the PI and his/her lab while at UW.		PI/DH
Data Retention and Management Record Retention	Ensure appropriate/required records are retained by UW. Informs PI of the UW's data management policy and requirement to provide sponsors with copies of data as needed. UW's policy is based on the NIH definition of "data," which is defined as recorded information, regardless of the form or media on which it may be recorded, and includes writings, films, sound recordings, pictorial reproductions, drawings, designs, or other graphic representations, procedural manuals, forms, diagrams, work flow charts, equipment descriptions, data files, data processing or computer programs (software), statistical records, and other research data. The policy is available at: http://www.uwyo.edu/research/policies-and-procedures/research_data_policy_march_2015.pdf		DH
	Ensure appropriate/required records are retained by UW.		PI/DH
	Acronym Legend: PI = Principal Investigator DH = Department Head PM = Property Management ORED = Office of Research and Economic Development OSP = Office of Sponsored Programs		