Introduction

When a Principal Investigator / Project Director (PI/PD) who receives externally funded research transfers in or out of Utah State University, Sponsored Programs is available to act as a resource to help facilitate this process in the most efficient way possible. Much of the administrative work to assist with the transfer of extramural research funding will be initiated by the PI/PD who is changing institutions as well as the PI/PD’s Department. Sponsored Programs will coordinate this process and will provide the review and institutional endorsement of the official paperwork that is needed to transfer the research funding.

When the PI/PD is transferring into or out of USU, a decision must be made as to whether the research will stay with the original institution or will be transferred to the new institution. A PI/PD will usually prefer to transfer most or all awards to the new institution, and both institutions and the sponsor generally support this desire. Some awards may not be transferred to a new institution. These may include awards that support a number of investigators or provide more general institutional support. Some sponsors will also decline to transfer awards that are near the end of the project period. Sponsored Programs can help to interpret the specific terms and conditions of an award related to the transfer and can help to facilitate discussions necessary to complete a desired transfer.

In those cases where an award is not expected to follow the PI, the sponsoring agency should be notified to request a change in the PI/PD. In some instances, the original institution may decide to allow the PI/PD to establish a sub-award in order to continue work at his/her new institution. Sponsored Programs will assist in facilitating this process including drafting and/or reviewing agreements with the other institution.

In cases where the award will be transferred to the PI/PD’s new institution, a request for transfer of an award should be discussed with the funding agency’s program officer as early in the process as possible so that any complications or concerns can be addressed in a timely manner. Sponsored Programs is available to help make this a smooth transition, and therefore it is very beneficial for the Department Business Staff or PI/PD to notify Sponsored Programs of the research funding transfer early in the process so that Sponsored Programs can help make the transfer happen smoothly.

Sponsored Programs’ procedures on the transfer of research awards are described below:

Responsible Parties:

Principal Investigator / Project Director (PI/PD) have the ultimate responsibility for providing information about the move to Departmental and Sponsored Programs personnel in a timely manner and ensuring that the transfer of the award is completed in accordance with all applicable sponsor regulations. The PI/PD must work with Departmental Business Staff and Sponsored Programs Accounting to assure expenditures are completed and accurate so the final financial
reports can be completed in a timely manner. The PI/PD is also responsible for completing any required technical reports.

Departmental Business Staff have the responsibility to conclude transactions and make any necessary adjustments to award accounts for departing PIs and to assist incoming PIs with applications.

Sponsored Programs shall review and institutionally endorse each sponsored program transfer. When a PI/PD is leaving the institution, Sponsored Programs shall also obtain signed amendments ending any outstanding subcontracts or other agreements. When a PI/PD transfers into the institution, Sponsored Programs will assist in reviewing and institutionally endorsing applications. Before these applications are awarded, Sponsored Programs may also assist by setting up a Letter of Guarantee so the PI/PD can begin research.

The Controller’s Office (Sponsored Programs Accounting (SPA)) has the responsibility to reconcile the financial aspects of the awards and to complete the final financial statements as quickly as possible after termination of the award. SPA also performs the financial functions necessary to set up a Letter of Guarantee.

Procedures:

A. To facilitate transfer of an award to another institution:

1. **Principal Investigator/Department Business Staff Responsibilities:**
   a. Contact Sponsored Programs as soon as possible, preferably several months before anticipated transfer.
   b. If Sponsored Programs or the Department identifies open issues related to the transferred award or related sub-awards at any time during the transfer process, they should work together to modify their action plan. When Sponsored Programs or the Department reaches a resolution related to these open issues, they circulate this resolution to all relevant parties, including the PI/PD, SPA, and the new institution as necessary.
   c. Notify the Department Head of the anticipated transfer.
   d. Notify the Program Officer at the sponsoring agency of the anticipated transfer.
   e. Discuss any technology developments with the Technology Commercialization Office (TCO).
   f. Review the original award documentation. Pay particular attention to the following:
      i. Review cost sharing requirements to determine if these have been met. Determine what cost sharing requirements, if any, will transfer to the new institution.
      ii. Review the agreement for equipment, produce a list of equipment purchased on the current awards. Discuss with Equipment Management (Controller’s Office), and obtain signature from the Department Head authorizing the transfer of equipment. Any movement of equipment that has not been purchased with this award must be approved by the Department Head and should also be facilitated by the Equipment Management Office. Refer to agency guidelines for specific requirements.
   g. Submit information to Sponsored Programs to complete the Relinquishing form for the sponsoring agency.
      i. NIH (PHS) – PHS 3734: “Official Statement Relinquishing Interests and Rights.”
      ii. NSF – Fastlane (Notifications and Requests)
iii. All other funding agencies: A signed sponsor/corporation/foundation form(s) as identified by the sponsor.

*This information provided should include the following:

- The effective date of relinquishment
- The estimated unexpended direct and F&A cost balances from the current budget period
  *Note – Try to error on underestimating the amount to be relinquished to allow for more expenses than anticipated before closeout at USU.
- A statement of intent concerning the transfer of equipment.

h. Following termination, submit the final Invention Statement if applicable and the Final Technical Report to the awarding sponsor.

2. **Sponsored Programs Responsibilities:**
   
   a. Contact all sub-awardees to let them know that there is an anticipated change to their contracted end date. Determine the current level of funding and anticipated expenditures and let them know that they will receive an amendment as soon as an end date is known.
   
   b. If Sponsored Programs or the Department Business Staff identifies open issues related to the transferred award or related sub-awards at any time during the transfer process, they should work together to modify their action plan. When Sponsored Programs or the Department Business Staff reaches a resolution related to these open issues, they circulate this resolution to all relevant parties, including the PI/PD, SPA, and the new institution as necessary.
   
   c. Review, institutionally endorse, and submit the relinquishment statement, forms and the memo with the information provided from the PI/PD. The estimate should be conservative to ensure that there are sufficient funds retained to meet all obligations that may develop. Forward a copy to SPA so that they know to expect final invoices from the sub-awardees. When reviewing the Relinquishing Statement, Sponsored Programs should:
      
      i. Determine the amount of unexpended or unobligated funds. These estimates can be determined talking to the Department Business Staff, and discussing anticipated expenditures with sub-awardees.
      
      d. Review commitments to personnel such as graduate students. If these individuals will still be working on the project, the PI/PD and the new institution will need to work together to make a sub-award back to the original institution once the award is transferred.
      
      e. Obtain signed amendments from the sub-awardees as soon as the end date is known to terminate USU’s legal and financial liability for the research. Amend end date and request final invoice. Send to SPA when the signed amendments are received to adjust the end date for each of the sub-awards.
      
      f. With the PI/PD’s permission, send a copy of the Relinquishing Statement to the new organization.
      
      g. Complete SP-02 once the revised award document is received from the sponsoring institution to de-obligate the funds and adjust the end date for the award.

3. **Controller’s Office (SPA) Responsibilities:**
   
   a. Following termination, issue final financial report. SPA should coordinate with Sponsored Programs to ensure that all amendments and final invoices have been received from the sub-awardees before the final financial report is submitted.

B. **To facilitate transfer of an award from another institution to USU:**
a. When a PI/PD is transferring into USU, Sponsored Programs will help to ensure that equivalent of the above steps have taken place at the original institution and that the originating sponsored research office has been in contact with Sponsored Programs. When the PI/PD is transferring into USU, an initial meeting is recommended with Sponsored Programs, SPA and Department Business Staff, to go over the incoming PI/PD’s portfolio and to determine necessary action steps or remaining financial issues.

b. Sponsored Programs will work with the originating institution and sponsor to confirm the transfer of the project and to determine the appropriate transaction for transfer. This will generally involve the relinquishment of the award by the originating institution and transfer of the award to USU by the sponsor. In some cases, such as transfer of an award close to the end date, the sponsor may prefer the original institution sub-award to USU rather than relinquish the award. Fellowship awards may require that the fellow remain a fellow of the originating institution when the sponsoring faculty member moves to USU, even if transferring physically. This will require clear communication with the fellowship office of the originating institution.

c. If the project involves human participants, live vertebrate animals, or any other controlled items identified on the SP-01 compliance section, Sponsored Programs should ensure that the PI/PD has drafted the necessary protocols and submitted them to the appropriate USU committee for review and approval or required training.

d. The PI/PD who is transferring to USU should submit a proposal/application through USU Sponsored Programs in accordance with the sponsor policies. This cannot be processed until the original institution has submitted the Relinquishing Statement. Sponsored Programs should also maintain a copy of the Relinquishing Statement in the award file. If the PI/PD needs any assistance with this application, Sponsored Programs is available to assist in any way possible.

e. Once the above steps are completed, Sponsored Programs will receive an award notice reflecting the estimated balance of the award funding to be transferred.

f. If the Department Business Staff submits a signed request for a Letter of Guarantee and Sponsored Programs has also received a copy of the Relinquishing Statement from the original institution, Sponsored Programs will work to facilitate the Letter of Guarantee so that the PI/PD can continue his or her research. The PI/PD, the Department Head / Center Director and the Dean shall approve and sign the Letter of Guarantee request.

g. After the original institution has submitted their final financial statement, the awarding agency may issue USU a revised notice of award to reflect a change in funding. This amount may be more or less than the original estimate. When applicable, Sponsored Programs completes the SP-02 to inform SPA of these changes.