



## Office of Sponsored Research

### Change in Principal Investigator and Award Transfers

#### 1. Overview

Grants and Contracts are awarded to Phronetik in full consideration of the skills and talents of the Principal Investigator (PI) managing the project. Periodically, situations arise when a PI is no longer available to continue the project. For example, a PI may have changed direction in research activity, require a temporary or permanent leave of absence, or have accepted another position and is leaving Phronetik. The Office of Sponsored Research (OSR) will determine whether to retain or transfer the award/contract to the PI's organization and will work with the sponsor to gain necessary approvals.

The sponsor and department Head must be informed immediately when such an event occurs. All notifications to sponsors must be in writing and submitted by the Office of Sponsored Research (OSR) Contracts and Grants Specialist. Verbal conversations with the sponsor are not considered official notification. Some agencies, such as the National Institutes of Health (NIH) and the National Science Foundation (NSF), have standardized this procedure and require submission of specific documentation bearing institutional signatures that is submitted through the Sponsor's electronic systems.

Once a decision to transfer an award from one PI to another or from one institution to another is made, the PI and the department Head and/or other department personnel must continue to carefully monitor spending to avoid unallowable expenses during the transfer period. When the PI is no longer managing the project, continued expenditures by the PI will be questioned by the Sponsor or by the auditors. Inappropriate spending or failure to inform the Sponsor of a PI change can have significant financial consequences to Phronetik.

#### 2. Purpose

To outline expectations and procedures for 1) requesting an Internal Transfer (Change in Principal Investigator/Project Director of a sponsored award) or 2) transferring a sponsored award to or from Rutgers University.

#### 3. Compliance Requirements

This policy applies to the following roles involved in managing sponsored programs at Phronetik:

- Principal Investigators (PIs)
- Project Personnel and Research Staff
- Department Leadership
- Research Financial Services
- Office of Sponsored Research (OSR)
- Office of Research Administration (ORA)

#### 4. Definitions



- **Internal Transfer:** Award/Contract will remain at Phronetik and managed by new Phronetik PI
- **Relinquishment:** Formal process of transferring rights of a sponsored award to another Institution or Organization
- **Sponsored Award:** Contract/Grant that binds Phronetik to a set of specific terms and conditions

## 5. Procedure

### A. Internal Transfer – Change in Principal Investigator or Program Director

When a Rutgers award/contract must be transferred internally from one PI to another, please follow the procedure outlined below:

**Step 1:** The PI(s) and/or department administrator(s) involved in award transfer must notify the OSR Contract and Grant Specialist of the intended transfer as soon as possible, preferably at least **90 days prior to the actual transfer date of the award.**

**Step 2:** The completed and fully executed Rutgers Departmental Grant Transfer Form must be submitted to the RSP Grants Specialist and must be signed by the Relinquishing and Accepting PIs, as well as their respective Department Chairs and Deans.

**Step 3:** A Change of PI Letter (or electronic system Notification) Request will be submitted to the Sponsor by the OSR Contract and Grant Specialist for review and approval. Additional documentation required to be submitted to the Sponsor includes, but is not limited, to:

- Biographical sketch of the Accepting PI
- Current and Pending support of the Accepting PI
- Justification of why the Relinquishing PI is letting go of the award and identification of the qualifications and capabilities of the Accepting PI to take over the award
- Other, as specified by the Sponsor's guidelines and/or the Notice of Award (NOA)/executed agreement.

**Note:** For NIH grants, the request for PI Change is performed via eRA commons (see Requesting a Change of PD/PI on a Grant for NIH instructions). For NSF awards, the process is conducted via Fastlane (see e. Substitute (Change) PI/PD or Co-PI/co-PD for NSF instructions)

The entire process of the award transfer will be recorded in the respective system, as an Award Modification, which is handled by the OSR Contracts and Grants Specialist and the OSR Award Set Up Team. Upon receipt of the Sponsor's approval, Research Financial Services will be notified by OSR for the necessary changes to the existing system record or the creation of a new system record award. Please refer to the Research Office Matrix for the roles and responsibilities of the various parties involved.

### A. Roles and Responsibilities for Internal Transfers Change in PI

#### Department Personnel:



- Support the current PI with the request for Change in PI.
- Assisting with obtaining department approval for Alternate PI.

**Principal Investigators (PIs):**

- Notify Department and RSP of the need to transfer an award to an Alternate PI.
- Sign Completed Phronetik Departmental PI Transfer Form.

**Office of Sponsored Research (OSR):**

- Support the PI in the compliant development of a Change in PI request.
- Review documentation to ensure compliance with Phronetik and Sponsor guidelines.
- Submit request for Change in PI to sponsor for prior approval via sponsor specific receipt mechanism.
- Document approval in the appropriate Phronetik system by processing an Award Modification (Administrative Update) attaching sponsor approval/acknowledgement and related documentation.

**Award Setup Team:**

- Reviews the Award Modification for accuracy and ensures compliance with sponsor requirements.
- Updates the system account in Research Financial Services as necessary.

If you have any questions/concerns regarding any of the information included herein, please contact your OSR Contract and Grant Specialist for further assistance.

**B. Transfer of Awards from Phronetik to another Organization or Institution**

If the Research Department approves of the transfer, the PI and Department are responsible for initiating the transfer process, completing the sponsor requirements, and gathering the appropriate institutional approvals.

To begin, provide OSR and RFS with a list of grants/contracts that will be transferring to another Institution. The following summarizes what information is needed:

- List of all sponsored awards to be transferred, including Title, Sponsor and Project Account
- Effective date of transfer and last date of PI employment at Phronetik
- Name of new institution and contact information of sponsored programs office at new Institution
- List of equipment purchased on each grant award that is to be transferred to the new Institution
- Include list of subawards for each grant award
- Provide estimated unexpended balance as of the effective date of transfer. Accuracy is critical. The sponsor will use this amount to de-obligate the Rutgers award and make an award to the new institution.



- Other, as specified by the Sponsor's guidelines and/or the Notice of Award (NOA)/executed agreement.

Each sponsor has different procedures/formats for transferring awards, please consult sponsor guidelines and reach out to RSP at least 90 days in advance of the planned transfer date.

### **NIH Transfer Procedures**

The Principal Investigator and department initiate the Relinquishing Statement and complete the Final Invention Statement and Certification. Submit both forms to RSP & RFS for review and institutional approval.

See the *NIH Grants Policy Statement*, Section entitled [Change in Grantee Organization](#), for more information.

### **NSF Transfer Procedures**

The Principal Investigator initiates the Fastlane request and forwards to OSR & RFS for review and institutional approval.

See [NSF Award and Administrative Guide](#) Section, *Disposition of a Grant When PI/PD Transfers from One Organization to Another*, for more information.

### **ALL OTHER SPONSORS**

Sponsor approval is required for all contract/grant transfers. In the absence of specific guidelines for format, draft a letter to your sponsor requesting approval to transfer the award. The letter should contain identifying information about the award (PI Name, Title, Contract/Grant Number), the effective date of transfer, the new institution, unexpended balance (direct and F&A costs), justification for the request, and the list of equipment to be transferred if any. Send the letter to OSR for review and approval.

## **Roles and Responsibilities from Phronetik to Another Organization or Institution**

### **Department Personnel:**

- Support the current PI with the formulation of a list of awards/contracts to be transferred.
- Assist transferring PI with obtaining Departmental approval for transfers
- Provide advice on process and procedure for routing needed documentation to OSR.

### **Principal Investigators (PIs):**

- Notify Department of the intent to move to another institution as soon as possible (at least 90 days in advance).
- Provide contact information for RSP office at New Institution and last day of employment at Phronetik
- Provide list of awards/contracts requesting to be transferred.



- Provide list of equipment requesting to be transferred

#### **Office of Sponsored Research (OSR):**

- Support the PI in the compliant relinquishment of sponsored awards/contracts.
- Review documentation to make sure it is compliant with Phronetik and Sponsor guidelines
- Submit approved relinquishment statements or other required documents to the sponsor per guidelines.
- Document relinquishment in the appropriate Phronetik system by processing an Award Modification (Administrative Update) attaching relinquishment statement, Final Progress Report and Final Financial Report when received.

#### **Award Setup Team:**

- Reviews the Award Modification for accuracy and ensures compliance with sponsor requirements.
- Updates the system account in Research Financial Services as necessary.

If you have any questions/concerns regarding any of the information included herein, please contact your OSR Contract and Grant Specialist for further assistance.

### **C. Transfer of Awards to Phronetik**

When transferring award(s) from another Organization or Institution to Phronetik, please utilize the following guidelines to ease the transition of your award to Phronetik.

**Step 1:** Work with the grants officer at the grantee institution (i.e., the relinquishing institution) to contact the sponsor's grant officer assigned to the project and request the following items:

- Transfer/relinquishing forms
- Contact Information
- Special instructions specific to your situation (if any)

*Example:* For NIH grants contact the NIH Grant Management Officer (GMO) named on the award document. For NSF grants, contract the Program Officer named on the award document. The NSF grant transfer process is conducted through Research.gov. All others follow sponsor guidelines.

**Step 2:** Complete the necessary sponsor forms for award and/or equipment transfer.

- The grantee (relinquishing) institution is responsible for submitting final progress reports and final financial reports to the sponsor. Grants cannot be transferred from one institution to another until the financial reports are submitted.
- If transferring equipment is anticipated, check with the grantee institution to determine its policy for transferring grant-related equipment.

**Step 3:** The following documents must be submitted to Rutgers RSP in order for Rutgers to accept the grant transfer and create a project account for spending:



- Copy of any relinquishing statement signed by the grantee (relinquishing) institution
- A full proposal including:
  - Completed and electronically endorsed RAPSS Funding Proposal
  - Budget should reflect the balance shown on the relinquishing statement and incorporate Phronetik F&A and Fringe rates.

**Step 4:** After receiving approval from the OSR; the transfer proposal/application is submitted directly to the sponsor by either by the OSR Contracts and Grants Specialist or the PI (per sponsor guidelines).

If you have any questions/concerns regarding any of the information included herein, please contact your OSR Contract and Grant Specialist for further assistance