

Research & Sponsored Programs Procedure Change In Principal Investigator and Award Transfers

1. Overview

Grants and Contracts are awarded to Rutgers, The State University of New Jersey 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 Rutgers. The University will determine whether to retain or transfer the award/contract to the PI's new institution and will work with the sponsor to gain necessary approvals.

The sponsor and department Chair or Dean must be informed immediately when such an event occurs. All notifications to sponsors must be in writing and submitted by the Research and Sponsored Programs (RSP) 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 administrator(s) 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 the Department and University.

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. Who Must Comply

Principal Investigators Project Personnel/Staff Department Personnel School/Institute/Center leadership Research Financial Services (RFS) Research and Sponsored Programs (RSP) Office for Research

4. Definitions

Internal Transfer: Award/Contract will remain at Rutgers and managed by new Rutgers PI

Relinquishment: Formal process of transferring rights of a sponsored award to another Institution

Sponsored Award: Grant/Contract that binds the University to a set of specific terms and conditions

5. Procedures

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 RSP Grant Specialist of the intended transfer as soon as possible, preferably at least three 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 RSP 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.

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

The entire process of the award transfer will be recorded in the respective RAPSS AWD record, as an Award Modification, which is handled by the RSP Grants Specialist and the RSP Award Set Up Team.

Upon receipt of the Sponsor's approval, RFS will be notified by RSP for the necessary changes to the existing ORACLE award or the creation of a new ORACLE award.

Please refer to the Research Office Matrix for the roles and responsibilities of the various parties involved.

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.
	•	Assist current PI in developing request for Change in PI. Provide advice on process and procedure for routing documentation needed to RSP.
Principal Investigators	•	Notify Department and RSP of the need to transfer an award to an Alternate PI.
	•	Sign Completed Rutgers Departmental Grant Transfer Form.

Research and Sponsored Programs	•	Support the PI in the compliant development of a Change in PI request. Review documentation to ensure compliance with University and Sponsor guidelines. Submit request for Change in PI to sponsor for prior approval via sponsor specific receipt mechanism. Document approval in the University RAPSS system by processing an Award Modification (Administrative Update) attaching sponsor approval/acknowledgement and related documentation.
Award Setup Team	•	Review Award Modification for completeness and accuracy.
	•	Process to Post Award for RFS Oracle Account update.

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

Resources

- a. <u>Research & Sponsored Programs website</u>
- b. Rutgers Departmental Grant Transfer Form
- c. Research Office responsibility Matrix

B. TRANSFER OF AWARDS FROM RUTGERS TO ANOTHER INSTITUTION:

If the Department and School approve 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 RSP 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 Rutgers
- 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 <u>Change in Grantee Organization</u>, for more information.

NSF Transfer Procedures

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

See <u>NSF Award and Administrative Guide</u> 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 grant/contract 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, Grant/Contract 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 RSP for review and institutional approval.

Roles and Responsibilities for Transfer from Rutgers to Another University

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 RSP.
Principal Investigators	•	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 Rutgers
	•	Provide list of awards/contracts requesting to be transferred.
	•	Provide list of equipment requesting to be transferred
Research and Sponsored	•	Support the PI in the compliant relinquishment of sponsored awards/contracts.
Programs	•	Review documentation to make sure it is compliant with University and Sponsor guidelines
	•	Submit approved relinquishment statements or other required documents to the sponsor per guidelines.

 Document relinquishment in the University RAPSS system by processing an Award Modification (Administrative Update) attaching relinquishment statement, Final Progress Report and Final Financial Report when received. 	
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Award Setup	•	Review Award Modification for completeness and accuracy
Team	•	Process to Post Award for RFS Oracle Account update.

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

C. TRANSFER OF AWARDS TO RUTGERS UNIVERSITY:

When transferring award(s) from another University to Rutgers, please utilize the following guidelines to ease the transition of your award to Rutgers.

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 Rutgers F&A and Fringe rates.

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

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

Resources

- d. <u>Research & Sponsored Programs website</u>
- e. Research Office responsibility Matrix
- f. <u>NIH Change of Institution User Guide</u>