



## **Principal Investigator/Project Director Transfer Policy**

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**Policy Number:** 600-011  
**Effective Date:** April 3, 2007  
**Last Updated:** April 3, 2009  
**Issuing Authority:** Vice President for Research and Compliance  
**Responsible Offices:** Office of Sponsored Programs/Research Administration, Academic Department, and Grant Contract Accounting

### **Purpose:**

To provide guidance regarding the transfer of a sponsored program in instances of a Principal Investigator/Project Director (PI/PD) that transfers one or more awards to or from Howard University and all related entities, business units, subsidiaries and affiliated organizations including, but not limited to, Howard University Hospital (hereinafter referred to collectively as "Howard University").

### **Policy:**

It is Howard University policy to allow the transfer of externally funded sponsored program awards to or from Howard University with the consent of the award sponsor, the PI/PD's Howard University school/college Dean, and the Office of Sponsored Programs Manager. Externally sponsored programs are typically awarded to an institution, not directly to a PI/PD. Therefore, it is within the discretion of Howard University to determine whether to retain, relinquish, or transfer an award to another institution in instances in which a PI/PD elects to transfer to another institution.

### **Business Process Description:**

If a PI/PD is transferring to/from Howard University, an institutional decision is made regarding whether to transfer the sponsored program. Some awards are less likely to be transferred. These may include awards that support a number of investigators (such as a Center Grant or Program Project) and awards that provide more general institutional support (such as Ruth L. Kirschstein National Research Service Awards). Additionally, sponsors may decline to transfer awards that are near the end of the budget period or project period. The Office of Sponsored Programs/Research Administration (OSP/RA) helps to interpret the specific terms and conditions of an award related to the transfer and facilitates any necessary discussions to complete a desired transfer. The processes for transferring sponsored programs to/from Howard are described below.

### **PI/PD Transfers From Howard University**

For cases in which a PI/PD is transferring from Howard University and the award is NOT expected to follow the PI/PD, the sponsoring agency is contacted with a request to change the project's PI/PD.



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If the transfer of a sponsored project from Howard University is desired, the PI/PD requests the approval of the Dean as well as the OSP Manager. To request this transfer, the PI/PD completes the *PI/PD Transfer Request Form* (TO BE DEVELOPED) with his/her Dean's approval and submits it to OSP/RA for any additional approvals that may be appropriate.

The sponsor's Grants Management Specialist or Contracting Officer should be contacted by OSP/RA at the initial stage of the transfer process. This ensures that any complications or concerns are addressed in a timely manner. When the approval of the transfer of the sponsored award is obtained, OSP/RA coordinates the transfer process with the sponsor and the receiving institution. This process typically involves terminating the research award at Howard University (see [Award Closeout Policy](#)) and the subsequent awarding by the sponsor of a new grant or contract to the receiving institution. As necessary, OSP/RA coordinates with the PI/PD and assists with any of the sponsor's concerns during this process.

When the PI/PD transfers the award from Howard University, he/she is responsible for the following tasks:

1. Contacting OSP/RA, as soon as possible, preferably several months prior to the anticipated transfer so that OSP/RA can begin the transfer process, including contacting the sponsor's Grants Management Specialist or Contracting Officer.
  2. Notifying the Department Chair and the Program Officer at the awarding agency of the anticipated transfer.
  3. Discussing any technology or intellectual property developments with OSP/RA.
  4. Reviewing the original award documentation for sponsor requirements, including cost sharing requirements. NOTE: This information is also reviewed and approved by OSP/RA prior to submission of the request to the sponsor to relinquish the award.
  5. Determining the amount of the cost sharing commitment to be transferred to the other institution, with guidance from OSP/RA.
  6. Working with OSP/RA to close out any subcontracts or other agreements related to the award.
  7. Completing the *PI/PD Transfer Request Form* and obtaining approval from Dean and the OSP Manager.
  8. Completing any relinquishing forms required by the sponsor and submitting to OSP/RA one or more of the following forms as it relates to the sponsored program:
    - NIH (PHS) – PHS 3734: "Official Statement Relinquishing Interests and Rights in a Public Health Service Research Grant." (<http://grants1.nih.gov/grants/phs3734.pdf>)
    - NSF – NSF 1263: "Grant Transfer Request" (<http://www.nsf.gov/pubsys/ods/getpub.cfm?form1263>)
    - All other funding agencies: Signed agency/corporation/foundation forms as identified by the agency
- NOTE: A relinquishment form typically includes the date of relinquishment, the estimated unexpended direct and F&A cost balances from the current budget period, and a statement of intent concerning the transfer of equipment. **This amount should include any expenses, and**



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**the applicable F&A cost, that have not posted. Failure to do this will delay the relinquishment of the award.** The relinquishing forms are reviewed and approved by OSP/RA prior to submission to the sponsor.

9. Submitting the Final Invention Statement and Technical Report to the sponsor.

The PI/PD transferring to another institution or college may want to take the equipment provided under a grant/contract to the new laboratory and, under certain circumstances, may be permitted to do so. Title to most equipment purchased under a U.S. government grant, cooperative agreement or contract normally vests in the sponsoring agency, and thus approvals to transfer the title of this property are sought from the sponsoring agency. All such requests and approvals are channeled through OSP/RA. The PI/PD creates a list of the equipment purchased during the award period and obtains approval from the Dean authorizing the transfer.

If at any time during the transfer process OSP/RA or the PI/PD's college/school identifies open issues related to the transferred award or related subcontracts, these parties work together to resolve the issues. When OSP/RA and the PI/PD's college/school reach a resolution related to these open issues, the RA circulates the resolution to all relevant parties, including the PI/PD, Grant and Contract Accounting (GCA), and the new institution, if applicable.

GCA prepares a final financial report and coordinates with OSP/RA to ensure that all amendments and final invoices are received from subcontractors, if any, before the final financial report is submitted. **All normal award closeout policies apply.**

### PI/PD Transfers To Howard University

In instances in which a PI/PD transfers to Howard University from another institution, it is within the discretion of the originating institution to transfer the sponsored program. If the transfer is authorized by the originating institution and the sponsor, the PI/PD transferring into Howard University is required to follow the proposal submission policy and the award acceptance and set-up policies. **All policies governing new awards apply.** OSP/RA is available to work with the other institution and the sponsor to help facilitate the transition. Once the transferring award is identified, OSP/RA meets with the PI/PD to review the PI/PD's current sponsored program portfolio, discuss any remaining obligations, and determine the next steps.

The PI/PD must obtain approvals from the school/college's Deans and Associate Vice President of Sponsored Programs prior to effectuating the transfer of each award. (See Proposal Development & Submission Policy and Award Acceptance & Set-up Policy for further guidance.)

**The PI/PD transferring to Howard University must submit the appropriate documentation in compliance with the Proposal Development and Submission Policy:**



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- A complete proposal
- An Application to Seek Off-Campus Funds form to OSP/RA
- Any required institutional clearances (e.g. IRB, IACUC, and Bio-Safety) to the institutional committee for approval
- All other requirements of the Proposal Development and Submission policy

In accordance with the sponsor's procedures, OSP/RA will generally submit a new application to the sponsor formally requesting the award and the remaining funds. This application may not generally be processed until the original institution has submitted their *relinquishing statement*. OSP/RA maintains a copy of the *relinquishing statement* in the award file and sends a copy to GCA.

In response to Howard University's application, when a transfer of a sponsored program is received OSP/RA will obtain an award notice from the sponsor reflecting the fund balance of the award being transferred. If so, the award is processed in accordance with the Award Acceptance, Negotiation and Set up Policy. Prior to this, if OSP/RA has a strong indication that the sponsor intends to transfer the award to Howard University, the PI/PD may submit a request for an Advance Account (see Advance Account/Pre-award Spending Policy for further guidance).

### **Roles and Responsibilities:**

#### **Academic Department**

- **Principal Investigator/Project Directors (PI/PDs):** The PI/PD has the ultimate responsibility for providing transfer information to the Dean and OSP/RA personnel, to ensure that the transfer of an award is completed and in accordance with all applicable Howard University policies as well as federal and sponsor requirements. The PI/PD is responsible for ensuring all applicable expenses have been allocated to the project prior to relinquishment. In order to request the transfer, the PI/PD completes the *PI/PD Transfer Request Form* and submits it, along with all sponsor-required forms, to OSP/RA for the appropriate approvals. The PI/PD is also responsible for completing any required technical reports.
- **Dean/Department Chairperson:** The Dean and Department Chairperson must approve all transfers (institutional approval from the OSP MANAGER is also required).

#### **Office of Sponsored Programs/Research Administration**

- **Research Administrator (RA):** The RA works closely with the PI/PD, and the sponsor's Grants Management Specialist or Contracting Officer, to assist with transferring the sponsored program to or from Howard University as described in this policy.

#### **Office of the Vice President for Research and Compliance**



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- **(Office of Sponsored Programs Manager):** The OSP Manager reviews and may provide institutional endorsement for each sponsored program transfer. The OSP Manager participates in the initial meetings with the PI/PD transferring to Howard University and discusses the steps required to transfer all or some of his/her awards. The OSP Manager provides institutional approval for the all transfers.

### **Grant Contract Accounting (CA)**

- **Assistant Director:** The Assistant Director reconciles the financial aspects of the awards and completes the final financial statements as quickly as possible after termination of the award.

### **Related Processes/Events:**

- Financial Status Reports Policy
- Award Closeout Policy
- Accounts Receivable Policy
- Residual Funds Policy
- Proposal Development and Submission Policy
- Award Acceptance, Negotiation and Set-up Policy
- Equipment Management Policy

### **Forms and Links:**

- OSP/RA Website: <http://ovprc.howard.edu/>
- Application to Seek Off-Campus Funds form
- PI/PD Transfer Request Form (to be developed)
- NIH (PHS)-PHS 3734: "Official Statement Relinquishing Interest and Rights in a Public Health Service Research Grant."  
(<http://grants1.nih.gov/grants/phs3734.pdf>)
- NSF-NSF 1263:"Grant Transfer Request: <http://www.nsf.gov/pubsys/ods/getpub.cfm?form1263>