PURPOSE

The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Research Administrator (RA), with regard to the successful transfer of sponsored projects from VCU to another institution.

INTRODUCTION

The relinquishment of a sponsored project and its transfer to a new institution is typically initiated by the decision of an investigator to relocate his or her research program and often coincides with the acceptance of an offer of employment at a new institution. Because sponsored projects represent a contractual obligation between the sponsor and the University, and because the University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of the award, all requests to transfer a sponsored project out of VCU and to another institution must be approved by the Department Chair, the School of Medicine, and the Office of Sponsored Programs. Depending on the sponsor the PI will need to secure advance approval from it as well.

PROCEDURE

Internally, advance notice is extremely important when initiating the process of relinquishing and transferring an awarded sponsored project from VCU to a new institution. The entire process often takes several months to complete, particularly when awards and contracts from Federal agencies are involved. As soon as a DA or RA becomes aware that a faculty member with active research is moving to a new institution, this process should begin.

The RA will work with the PI to develop a plan for relinquishing and transferring each active sponsored project, to include:

- **Effective date**
  - Confirm effective date of transfer to new institution. Consider the investigator’s last day as a VCU employee and the first day of their new appointment at the new institution. Consider the current project end dates for all active sponsored projects. Each project that is being relinquished will need to have an effective date of relinquishment – this drives when expenses will stop on those projects here at VCU, when they will be picked up by the new institution once the award is transferred, etc.

- **Working with the new institution**
  - Provide as much information as you can to the new institution for each award that is being transferred, such as: copies of the initial proposal, initial and/or latest notice of award, last progress report submitted to sponsor, subcontractor information (as applicable) and any completed relinquishment forms (when final).

- **Projected remaining available balance**
  - For all awards that will be transferring, determine the projected remaining available balance as of the effective date of transfer. Take into account all salary and fringe commitments as well as any outstanding invoices from vendors or subawardees. Work with Grants & Contracts
Accounting to document how you are calculating the projected final unobligated balance for relinquishment purposes and be prepared to provide this information to Office of Sponsored Programs.

Projects with subawards
- If the transferring project has active subawards, work with OSPAWARD team to modify the termination dates and award amounts for all subaward agreements between VCU and other institutions. Notify subaward PI and administrative staff of the upcoming grant transfer.

Research team staff
- If any research staff are transferring to the new institution, as well, they must be terminated in the HR system at VCU. Discuss with the Department Administrator the plans for all VCU staff currently paid from the sponsored projects.

Work continuing at VCU
- If work remains to be done at VCU, consider that a subaward may need to be issued BACK to VCU from the new institution to support any aspects of the project that will not be moving. Work with Office of Sponsored Programs to submit a subaward proposal to the new institution.

Effort and monthly expense report certification
- Ensure the investigator certifies all outstanding effort reports in the ECRT System and reviews and certifies all monthly expense reports in the PI Dashboard. Once all aspects of the award transfer are complete, have Grants & Contracts Accounting update the Expenditure End Date on all associated grant indexes using the effective date of the transfer (this will keep monthly expense reports from generating in the Dashboard after the PI has left VCU).
- If the PI is unable to certify Monthly Expense Reports in the PI Dashboard OR is unresponsive to DA and RA requests to do so, contact SOMRESADMIN@vcuhealth.org for assistance.

The PI and RA will work to complete all required documents – both required by VCU and the sponsor, to include:

Any sponsor required documents
- Complete all sponsor required relinquishment documents. For NIH, this includes the PHS 3734 Official Relinquishing Statement which must be signed by Office of Sponsored Programs. Non-federal sponsors’ required documents vary so contact the sponsor to determine what is required.

Data access and ownership
- Draw up a data ownership, retention, and access agreement, keep on file in the department, and provide to the new institution as applicable. A template for this data agreement can be found attached to the VCU policy “Research Data Ownership, Retention, Access, and Security.”

Equipment
- List any equipment that will be transferring with the award. This list must be reviewed and counter-signed by both the Department Chair and the School of Medicine Dean’s Office. Contact SOMRESADMIN@vcuhealth.org for an example equipment transfer list.

Transfer of research materials
- Execute a material transfer agreement, if needed. Work with Office of Sponsored Programs’ Gray Team to develop and execute an agreement to transfer any materials (biological, etc.) that will be physically transferred from VCU to the new institution.
**Intellectual property**
- If any intellectual property has been created from the sponsored project, contact the VCU Innovation Gateway office to make them aware of the award transfers.

**IRB and IACUC protocols**
- If none of the research will continue at VCU, close out all IRB and IACUC protocols. If IRB or IACUC protocols need to remain open at VCU, work with the Office of Research to designate new protocol PIs.

In order to secure School of Medicine and Office of Sponsored Programs approval of the relinquishment and transfer of the sponsored project, the RA will submit an Administrative Action (AA) in RAMS-SPOT for a Grant Relinquishment.

- Complete the Office of Sponsored Program’s “Grant Transfer Between Institutions Form,” gather PI and Department Chair signatures, and upload the form to the AA in RAMS-SPOT prior to routing for internal approval.
- In addition, upload any sponsor required relinquishment documents, the signed data access and ownership agreement, and the list of equipment that will transfer to the new institution (signed by the Department) to RAMS-SPOT prior to routing.
- When the Administrative Action is routed to School of Medicine for review and approval, SOM will facilitate the SOM Dean’s signature and re-upload the form to the AA before routing to Office of Sponsored Programs for final review and approval. Do not send the “Grant Transfer Between Institutions Form” to any other email address or drop off at the SOM Dean’s Office. The form must be routed to SOM via the AA in RAMS-SPOT.

**RESPONSIBILITY**

**Principal Investigator (PI)** The PI is primarily responsible for:

- Providing as much advance notice to the DA and RA as possible and any other requested information in a timely manner
- Working with the RA to draft the data ownership, retention, and access management agreement, the equipment list to be approved by the Department Chair and SOM Dean’s Office, and Material Transfer Agreements for any material that must be moved
- Ensuring that all active IRB and IACUC protocols are either closed or transferred to a new PI prior to the sponsored projects being transferred to the new institution
- Reviewing and certifying all effort reports and Monthly Expense Reports in the PI Dashboard
- Any outstanding items where signature is required after the transfer date

**Research Administrator (RA)** The RA is primarily responsible for:

- Creating a plan with the PI for successful and timely completion of all required steps for relinquishing and transferring active sponsored projects to a new institution
- Providing administrative and budget information as needed
• Submitting the Administrative Action in RAMS-SPOT to gather School of Medicine and Office of Sponsored Programs approvals
• Working with G&C any VCU closeout internal forms that are required (90 day notice, Final Expenditure Report, etc)

**Department Administrator (DA)** The DA is primarily responsible for:

• Alerting the RA of the PI’s intention to terminate from the University and providing a termination date
• Facilitating closeout of lab space and accounting for all equipment and/or materials remaining at the University