

Sponsored Project Administration

Procedure: Transferring an Award to a PI's New Institution

Owner: Sponsored Project Administration Central RA Team

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Background

Awards are made by and between the UVM and the Sponsor. When a Principal Investigator plans to leave UVM prior to an award expiring, UVM may terminate the award early, nominate a new UVM Principal Investigator, or agree to transfer the award and equipment purchased using award funds to the PI's new institution. A transfer happens in two stages: UVM first relinquishes the award (and equipment, if applicable). Relinquishment is the formal process of ending an award intended for transfer. The relinquishing university identifies the date they have stopped working on the project, the amount of funds (out of the total originally awarded) that they have spent so far, and the progress they've made on the stated goals of the project. The sponsor then reviews this information against their own records to confirm. Once the relinquishment process is complete, the sponsor can make a new award to the new institution.

Purpose

This document sets forth the procedure for the <u>relinquishment of an award and equipment</u> that will be transferred to a PI's new institution.

Roles and Responsibilities

<u>Principal Investigator and Unit Administrator</u>

- Principal Investigators or Unit Administrator have the primary responsibility to initiate the award relinquishment process.
- Principal Investigator should consult and discuss with sponsor's program officer, Department Chair, SPA, RPO and Unit Administrators early and often when leaving UVM.
- PI will need to secure Department Chair written disposition instructions for each award.
- Work with SPA, RPO, OTC and other UVM units to properly close out existing awards and complete sponsor relinquishment forms, submit final invention statement and technical reports, as applicable.

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- Provide a detail list of the PI's active awards and pending proposals for discussion.
- Determine the amount available to transfer.



- Facilitate the relinquishing process. Review sponsor relinquishing guidelines.
- Work with PI and Unit Administrators to discuss any outstanding issues or action items.
- Assist with completing sponsor relinquishing forms and submit to sponsor.

Definitions

Relinquishing Statement: Official statement relinquishing interests and rights to a sponsored project, federal or non-federal.

SPA: Sponsored Project Administration

RPO: Research Protection Office

OTC: Office of Technology Commercialization

AA: Award Acceptance Officer

FA: Financial Analyst

RA: Central Research Administrator

PI: Principal Investigator

OSA: Outgoing Sub-Award Specialist

ARS: Accounts Receivable Specialist

UA: Unit Administrator (For the purpose of all procedures, SPA 2.0 pre-award specialist, Business Unit Administrator, Business Manager, Grant Administrator and Department Administrator are all used interchangeably and refer to the person assisting the PI in the Department.)

Procedure

PI and Unit Administrators Initiate Relinquishment

- PI or Unit Administrator should contact your <u>assigned SPA Research Administrator</u> for a list of active awards and pending proposals.
- SPA RA will assist with identifying any sponsor-specific relinquishing guidelines.
- PI should discuss with Department Chair and secure written disposition instructions for each award and pending proposal.
- PI in coordination with Unit Administrator(s) establish the relinquishment date for each award and alert anyone working on or supporting the project. This includes the PIs team as well as all pre- and post-award grant support staff. No spending may occur after the relinquishing date. The relinquishment date should be the final date of a pay period to ensure accurate effort accounting.
- Identify equipment purchased with award funds that will transfer to the new institution.
- The following information is required for each award that will be transferred to the PI's new institution:
 - o PI's name



- Sponsor name
- Grant/Award number
- o Amount of unobligated funds remaining (see below)
- Original Expiration date
- o Relinquishment date
- o Identify Equipment (>\$5,000) being relinquished.
- o Identify if a Subaward back to UVM is anticipated.
- Name of new Institution
- New Institution contact information (Grants Manager or Authorized Representative)
- o Include any special instructions.
- Signature of Principal Investigator
- Signature of PI's Department Chair, indicating Approval.
- Submit memo including all the details and approvals indicated above, along with any completed sponsor relinquishing forms to your <u>assigned SPA Central Research Administrator.*</u>
- SPA will review for completeness and accuracy, provide UVM approval, sign and submit to sponsor.
- PI and Unit Administrators begin the award closeout process as if the award had run to its natural
 end. This includes approval of effort reports, cost-sharing, and submission of a final progress,
 invention, and property report.

*When one PI will be transferring multiple awards, SPA is able to accept this information either as one memo wherein the details and approval for all applicable awards are included, or as separate memos for each award. In cases where decisions have been made about some but not all a PI's awards, it is better to move forward with those awards that have been decided than to wait until an agreement has been reached on a PIs entire portfolio.

Determining the Estimated Unobligated Balance

- SPA Financial Analyst working with the Unit Administrator calculates the estimated unobligated balance available to be relinquished, less any holdback.
- SPA will hold back a minimum of 10% of unobligated funds, plus any sub-recipient obligations not yet liquidated, to ensure that UVM has funds retained to meet obligations that may be pending in the UVM financial system and not yet charged to the award.
- Any unspent funds remaining after final close will be returned to the sponsor. The sponsor can then issue a new award to the new institution and those funds again become available to the PI for spending. UVM's official close occurs usually within 90-days from relinquishment date.

Notify Subrecipients of Early Termination

- SPA's outgoing Subaward Office upon notification of a relinquishment date will work with the PI
 and Unit Administrator to issue subaward amendments to each subrecipient, terminating the
 subaward early due to the award being relinquished.
- Subrecipients should issue a final invoice to SPA as soon as possible.
- New institution is responsible for arranging new subawards with subrecipients.

Complete Sponsor Relinquishing Statements and Reports

- PI with assistance from SPA RA will review the award conditions and complete relinquishing forms required for each sponsor.
- SPA signs and submits final relinquishing forms to Sponsor with a copy to the new institution.



• PI prepares and submits to the sponsor final programmatic report.

Transferring Equipment

Equipment Purchased from an Active Award being Relinquished.

- Equipment purchased on a single active award that has been approved for relinquishment may be transferred to the PI's new institution without reimbursement for the cost of the equipment to ensure the research can continue without interruption.
- If the equipment was purchased using funds from multiple awards, the determination will be made on a case-by-case basis. Contact SPA RA to discuss.
- The PI may be charged for ancillary costs such as dismantling or shipping and handling costs which should be paid for by the new Institution.

Equipment Purchased from Expired Awards

- Equipment purchased on expired awards or on any other funds will be reviewed on a case-by-case basis with the PI, Chair, Dean, SPA Director, and Cost Accounting.
- If the transfer is approved without charge, ancillary costs such as dismantling, shipping, and handling costs should be paid for by the new institution.
- If selling the equipment to the new institution, sponsor approval may need to be obtained. Please coordinate with SPA and UVM's Property Office.

Coordinate with Research Protections, Office of Technology Commercialization

- The PI in coordination with the Unit Administrator is responsible to ensure proper close out of all human subject, animal, and biohazard protocols with RPO.
- The PI in coordination with the Unit Administrator responsible to ensure proper closeout of intellectual property agreements and material transfer agreements with OTC.

Award Closeout and Final Financial Report

- SPA FA will coordinate with the Unit Administrator to ensure that all amendments and final invoices have been received from the Subrecipients.
- SPA FA will confirm with the Unit Administrator that all expenses have posted, and effort has been reviewed.
- SPA FA prepares the Final Financial Report (FFR) and submits to sponsor as outlined in award agreement terms and conditions.
- SPA ARR remits any unspent funds to the sponsor as outlined in the terms and conditions of the award. Unobligated balances are returned back to the sponsor, and the sponsor is responsible for releasing those funds to the new institution with a revised Notice of Award.
- SPA FA will perform final accounts receivable reconciliations and complete closeout procedure as appropriate in PeopleSoft.
- SPA AA processes written notice from the sponsor that clearly identifies the relinquishment amount and date. SPA AA will check with the FA and RA to confirm reporting & other requirements have been completed.
- SPA AA will complete a checklist to change the (1) end date (2) financial reporting milestones if indicated on sponsor's notice, and (3) billing limit.
- The checklist will be entered by the Set-up Specialist and a notification will be sent to the PI and Unit Administrators.



Process for Specific Federal Sponsors

National Institutes of Health (NIH)

- SPA RA submits the NIH Relinquishing Statement into eRA Commons.
- PI prepares and submits the NIH Final Invention Statement HHS 568, via eRA Commons. If inventions are disclosed all information needs to be confirmed by OTC prior to submission.
- SPA FA prepares and submits the Final Financial Report, via eRA Commons.
- NIH, upon receipt of new institution's transfer application, will issue a grant award.

National Science Foundation (NSF)

- The PI or the RA shall notify the cognizant NSF Program Officer and obtain informal approval of the transfer.
- PI with assistance from SPA RA initiates a PI Transfer Request within research.gov.
- SPA FA completes the funding and expenditure information with the transfer amount automatically calculated.
- SPA RA concurs with the transfer of the award by electronically forwarding the request to the new organization within research.gov.
- The new organization completes the request by providing a detailed budget for the transfer amount agreed to by both organizations and submits within research.gov.
- NSF will assign a proposal number at the time of submission. This proposal number will become the new award number when the transfer is approved by an NSF Grants and Agreement Officer.
- PI prepares and submits NSF "Annual Project Report" via research.gov.

All other Federal or non-Federal Sponsors

• Contact SPA RA and coordinate with program officer for sponsor-specific requirements.

Helpful Links

National Institutes of Health (NIH)

• Grants Policy Statement

National Science Foundation (NSF)

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Document Change Record

Date	Version	Author	Change Details
03/01/2018	1	SPA	Initial release
05/25/2018	1.1	SPA	Removed Inactive Link
4/29/2021	1.2	SPA	Link Update



7/25/2022	1.3	SAP	Corrected Background Section and Helpful Link Update