

Procedure for Grant Relinquishments/Transfers from UMMS

I. General Guidelines

This guidance document describes the procedures associated with the relinquishment of grant awards back to a sponsor when a Principal Investigator (PI) transfers from UMMS to a new institution as well as the responsibilities of those involved in the process. This guidance should be used in conjunction with the UMMS Departing PI – Award Transfer Notification/Department Checklist to facilitate award relinquishments from UMMS.

A PI's UMMS Research Trust Fund (RTF) accounts, earned clinical trial balances and fixed price residuals are institutional funds and will remain with UMMS when a PI leaves.

Adherence to these procedures will ensure that the PI and UMMS meet sponsor requirements as well as institutional policies/guidelines when relinquishing grants.

II. Reason for Procedure

Federal grants and contracts are awarded to UMMS, not directly to Principal Investigators, thus the University will determine on a case-by-case basis whether it will retain, terminate or relinquish the grant of a departing PI. As the grantee institution, UMMS must approve the relinquishing of the grant to the awarding agency and any related equipment to the PI's new institution. The awarding agency must also approve all grant/contract transfers from one institution to another.

III. Relinquishment of an Award from UMMS to the Awarding Agency

Initiating the Relinquishment

It is the responsibility of the departing Principal Investigator to contact the Department Chair and Department Administrator as soon as they know they will be leaving UMMS to discuss what awards they would like to transfer to their new institution. For most awards, the decision on whether to relinquish will be at the discretion of the Department Chair.

Completing Federal Requirements

Once the Chair has approved what awards will be relinquished, the Principal Investigator should contact their Agency Program Officer to initiate the transfer discussion and provide RFS with the date the award(s) will be relinquished, the new institution's administrative contact information and disposition instructions for any existing subcontracts. In addition, the PI will need to communicate whether any portion of the transferring project will need to be subcontracted back to UMMS by their new institution. The PI will work with the Department Administrator to ensure that any committed cost sharing requirements have been met.

Agencies generally need at least 90 days to complete the process of transferring an award from one institution to another. Some agencies, including NIH, will generally not agree to transfer an award within the last six months of a project period, although they may permit the original grantee to issue a subcontract to the principal investigator's new institution to allow completion of the original project.

The PI and/or the Department Administrator should complete the appropriate Agency Relinquishing Statement and Final Invention Statement or Project Report. The relinquishing form should include the following:

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- Effective date of relinquishment
- Estimated unexpended direct & F&A cost balances from the current budget period (carry-over funds from previous budget periods should not be included in these amounts)
- A statement of intent concerning the transfer of equipment

For NIH awards, the appropriate forms can be found at the following websites:

PHS 3734 Official Statement Relinquishing Interest and Rights in a PHS Research Grant (<http://grants1.nih.gov/grants/phs3734.pdf>)

HHS 568 Final Invention Statement and Certification (<http://grants1.nih.gov/grants/hhs568.pdf>)

See agency specific instructions/forms for non-NIH awards.

Depending on sponsor requirements, a final UMMS progress report may be needed separate from the grant transfer process. The PI should work with the Department Administrator and RFS to complete this closeout activity.

Internal Processing Activities

The Department Administrator and the PI should use the UMMS Departing PI – Award Transfer Checklist as guidance for the most common requirements that must be completed prior to departure.

The checklist contains questions relating to personnel working on projects to be transferred, as well as other compliance items such as Human Subject Research, Biohazardous Materials, etc. The appropriate UMMS contact information is included for each area of concern. PI's and Department Administrators should take note that the requirements for termination notices vary for staff versus post doctoral staff and faculty members.

RFS will provide additional guidance to the Department Administrator and PI to determine any necessary steps or issues related to the disposition of the grant portfolio. Upon the PI's request, RFS will terminate subrecipient agreements or modify the end dates to align with the PI's termination. It will be the responsibility of the PI's new institution to initiate new subagreements once the transfer has been approved by the awarding agency.

The Department Administrator will forward the relinquishing documents to Grant Accounting, which is responsible for reviewing the unexpended or unobligated funds included on the Agency Relinquishing Statement. The estimate should be conservative to ensure there are sufficient funds to meet all obligations that may occur during the transfer period.

Final Relinquishing Activities

Once Grant Accounting approves the Relinquishing Statement, the form is routed back to RFS for signature by the UMMS Authorized Official. For NIH relinquishments, RFS will upload the signed relinquishing statement to the eRA Commons. Notification will be sent to the PI via email once the Authorized Official has submitted. A

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scanned copy of the Relinquishing Statement will be sent to the Department Administrator. For non-electronic submissions, RFS will return the signed form to the Department Administrator for submission to the sponsor.

Following the relinquishment of the grant, Grant Accounting will submit the final financial report (FFR) to the sponsor. The department should coordinate with Grant Accounting to ensure all final invoices have been received from subrecipients before the final financial report is submitted. Once the sponsor approves the FFR, any unobligated balance is released and the sponsor is responsible for issuing the funds to the new Institution with the revised Notice of Grant Award.

RFS will then work with the Administrator and PI to secure the Final Invention Statement and closeout of the transferred grant.

Responsibilities	PI	Dept Admin	Research Funding (RFS)	Post-Award Admin & Compliance	Faculty Affairs
Contact the Sponsoring Agency, Department, and RFS in advance of the transfer date	P	S			
Complete the Agency Relinquishing Statement	P	S	S	S	
Submit hard copy relinquishing statement to sponsor (non-NIH)		P			
Submit relinquishing statement via eRA Commons for NIH awards			P		
Complete the Final Invention Statement	P	S	S		
Complete the final progress report (if applicable)	P	S	S		
Include appropriate paperwork with requests to transfer the grant, including detail of any materials or equipment	P	S		S	
Contact all subrecipients to let them know that there is an anticipated change to their contracted end date and request amendment to the contract	S		P		
Review UMMS Departing PI – Award Transfer Notification/Department Checklist to and discuss any outstanding issues or action items	S	S	P	P	
Issue final financial report to sponsors				P	
Terminate any faculty and staff appointments and payroll		P			S

KEY	
P =	Primary Responsibility
S =	Secondary Responsibility