

This guidance provides a roadmap for investigators and department administrators of the necessary notifications, processes and policies applicable to departing researchers. Individual departments and colleges may have additional requirements, and should be consulted.

ORPA GUIDANCE FOR PRINCIPAL INVESTIGATORS AND ADMINISTRATORS WHEN A PI IS LEAVING THE UNIVERSITY

Generally:

A change of grantee request will be permitted only when all permanent benefits attributable to the original project can be transferred. This may include equipment purchased in whole or in part with grant funds.

Approval by the Chair must be obtained for any project transfer.

If a project is an NIH Multiple PI (MPI) Grant, all MPIs must agree with the transfer.

Transfers must be completed prior to the expiration of the approved transfer period.

Failure to provide timely notification of a project transfer may result in a delay in processing.

Notification to ORPA

PI must provide the following information to ORPA:

- Firm departure date
- Departmental and institutional contact information at the new institution
- Plan for current sponsored projects
 - Will all projects transfer to the new institution?
 - If projects will remain at UR – who will be the new UR PI?
 - Will a portion of the project be subcontracted back to UR from the new institution?
 - Will PI maintain an appointment at UR? Will that appointment be a paid or unpaid appointment?

Department administrator may assist by:

- Contacting other faculty/departments currently supported by PI's sponsored projects
- Notifying ORPA

Transfer procedures for sponsored projects vary by sponsor. Please work with your ORPA Research Administrator (RA) to determine what information each sponsor requires. However, generally, the following must occur:

ORPA will work with PI to notify sponsors whether the project transfers or a new UR PI is named.

- If project is to remain at UR, a new PI must be named and a justification letter, signed by both PI (and ORPA RA), must be sent to sponsor for review and approval, A biosketch for the new PI must be included with the letter.
- If PI is transferring the project to the new institution, PI must notify the Program Officer/Sponsor of their intent to transfer the project. If project is transferring, ORPA, ORACS and the department administrator will work on the closeout and relinquishment of project. This may involve the completion of a relinquishing form that will involve estimation of remaining funds, invention(s) reporting and accounting for any equipment

purchased with sponsored project funds. The relinquishing form may require the written approval of the Department Chair/Center Director, as well as ORACS and ORPA.

- If project is terminating early, seek Department Chair/Center Director approval and involve your ORPA RA to notify the sponsor.
- If there are subagreements on any of PI's awards, the subrecipient site(s) must be notified of PI departure. If grant is being relinquished by UR, subagreement modifications must be completed by UR to terminate work by the subrecipient.
- Any pending grants must be officially relinquished by UR.

Transferring data

- PI should be familiar with the University of Rochester's Access to and Retention of Research Data policy, particularly the section on investigator responsibilities when leaving the University, http://www.rochester.edu/orpa/assets/pdf/policy_retent.pdf
- If PI is planning to transfer research data involving human subjects, contact the Research Subjects Review Board and check the Guideline for Investigators Leaving the Institution at:
http://www.rochester.edu/ohsp/documents/ohsp/pdf/policiesAndGuidance/901_GDL_Inv estigators_Leaving_Institution.pdf
- If PI has entered into any Data Use Agreements (DUAs), these must be terminated and data disposed in accordance with the DUA.

Laboratory and Animal Transfer, Closeout or Disposal

- For PI's using animals in their research, contract the University Committee on Animal Resources (UCAR) at <https://www.urmc.rochester.edu/ucar.aspx> for information and guidance regarding transfer or euthanasia.
- If closing a laboratory or planning to transfer lab material, contact Environmental Health and Safety <http://www.safety.rochester.edu/index.html> for decommissioning instructions.

Effort Reporting

- Prior to leaving UR, PI must certify their final effort/payroll allocation
- Department administrator must process a termination PAF and have the PI certify the final effective effort/payroll allocation for all affected laboratory personnel. The effective date of the PAF is the date of termination
- If PI leaves UR before certifying final effort/payroll allocation, a responsible person with sufficient knowledge and means of verification of the work performed, may sign the certification. In such circumstances, proof of suitable means of verification must be maintained.
- See more on effort certification at
http://www.rochester.edu/orpa/assets/pdf/policy_EffortReportingPolicy.pdf

Other Compliance Issues

- If PI is leaving for a foreign institution, check export control policies and guidelines, available on ORPA site at <http://www.rochester.edu/orpa/compliance/#export>
- Check with RSRB and UCAR regarding any open protocols
- Environmental Health and Safety (<http://www.safety.rochester.edu/>) should be involved in any laboratory closeout process to assist in the disposal of chemical substances.
- Environmental Health and Safety/Radiation Safety must be involved to remove radiation-emitting equipment, coordinate transfer or removal of radioactive material and/or to decertify of the lab.

- Protocols using recombinant DNA approved by the Institutional Biosafety Committee (IBC) for which the departing investigator serves as PI must be terminated or an alternate PI must be named. See the IBC home page at <http://www.safety.rochester.edu/homepages/ibchome.html>
- The Embryonic Stem Cell Research Oversight Committee (ESCRO) must be notified of the departure of any PI with an approved protocol. It can be reached at: <https://www.urmc.rochester.edu/stem-cell/escro.cfm>
- If the departing PI is the sponsor of an IND or IDE application, the application should be withdrawn if the clinical studies under the application have been completed, or transferred to another University PI if the studies are to continue.
- Research drug supplies utilized in a sponsored study should be disposed of as indicated by the sponsor of the study.
- If any inventions have resulted from PI's sponsored projects, UR Ventures should be contacted at <http://www.rochester.edu/ventures/>. Also see PowerPoint Presentation entitled, "IP Issues When a PI Leaves" on ORPA website under Policies (<http://www.rochester.edu/orpa/policies/>)
- If any research materials will be transferred to new institution, Material Transfer Agreements (MTA's) should be started. See MTA checklists at <http://www.rochester.edu/orpa/forms/#mta>.
- If the PI has entered into an MTA for material transferred from another institution, this must be terminated or amended.
- PI must be current on all required reports prior to departure, including any outstanding final or progress reports
- ID Card access to secure space by PI and other departing lab personnel must be discontinued
- University ID cards for the PI and other departing lab personnel must be collected and destroyed
- Record Retention: The PI may take all pertinent scientific documents related to past or current grants as long as the materials remain secure and available to UR in the event of an audit. Refer to most recent UR Record Retention policies. http://www.rochester.edu/orpa/assets/pdf/policy_retent.pdf

Equipment (including computers)

PI must discuss any intent to take equipment to the new institution with their Department Chair/Center Director who must approve of the transfer of equipment. (Most federal sponsors reserve the right to transfer title of equipment bought with NIH funds to the new organization.)

- Transferred equipment purchased with sponsored funds must be listed on the relinquishment form for any sponsor
- Department administrator should work with PI to determine the original source of support for each piece of equipment
- Property Accounting must be involved for equipment transfers and the University Equipment Inventory should be updated accordingly.

Personnel

- If the departing PI is listed on the awards of other UR PI's, those PI's must be informed of the departing PI's termination.
- A list of personnel supported by the PI should be developed including timelines, plans for layoffs, termination letters, and payouts
- Any immigration issues must be addressed

Subagreements/Contracts

- Any subrecipients, contracted service or commodity providers involved with PI's projects must be notified of the pending transfer and the University relationship (subcontracts, consulting arrangements, etc.) must be terminated to allow for the process to begin for a timely close-out of expenses and subsequent payments.
- ORPA and/or Purchasing can assist to get modification paperwork submitted

Award Closeout

- Ensure all closeout costs have been processed prior to PI termination. Terminate as soon as possible, SOLO, PMM, and P-Card charges or accounts; standing or blanket orders, etc.
- Ensure all cost sharing commitments have been completed and documented
- In some cases, look for revised notice of award
- Ensure all program income has been deposited and reported

UR has 120 days to fiscally close-out some federal grants; time frame varies with other sponsors and for federal contracts.

ORPA 1/2016