

# Procedure for Incoming Grant Transfers from another Institution

## I. General Guidelines

This document describes the procedures associated with the incoming transfer of a grant into UMMS for a newly hired Principal Investigator (PI) as well as the responsibilities of those involved in the process. This guidance should be used in conjunction with the UMMS Incoming PI Award Checklist.

## II. Reason for Procedure

Adherence to these procedures will ensure that the PI and UMMS meet sponsor requirements as well as institutional policies/guidelines when transferring awards and facilitate both the acceptance and set up process.

## III. Transfer of an Award to UMMS from the Original Recipient/Awarding Agency

Transferring a research grant from another institution to UMMS requires coordination between the incoming PI, the original grantee institution, and the funding organization (NIH, for example). The PI's prior grantee institution must relinquish the grant back to the sponsor for approval before the sponsor can approve the transfer of the award and any equipment (if applicable) to UMMS.

In many cases, sponsors will allow grants to be transferred when a PI leaves their institution. However some sponsors may impose limitations on grant transfers, such as permitting transfers only on the anniversary date of the original award or disallowing transfers late in the budget period. The transfer process should be started as soon as the incoming investigator knows the award will be transferring since the transfer may potentially involve movement of animals, materials, personnel, and the establishment of subcontracts or MTAs.

In addition to obtaining approval from the relinquishing institution and the funding organization, the PI *must also meet all UMMS administrative requirements (including IACUC and IRB approvals) before a transferred award can be accepted.* It is critical that the process of transferring grants is initiated as early as possible after the recruit commits to moving to UMMS.

### Initiating the Transfer

To transfer awards to UMMS, the incoming Investigator should initiate discussion on the status of their awards and plans for the future with the sponsor, their new UMMS and prior institution departments and the UMMS Office of Sponsored Programs (OSP).

In order to serve as a Principal Investigator at UMMS, the incoming faculty member must read and sign the UMMS Participation Agreement, indicating acceptance of the institutional intellectual property policy. This is a one-time requirement that must be addressed before any proposals can be submitted. The Participation agreement and the UMMS Intellectual Property Policy are available at:

<http://www.umassmed.edu/uploadedFiles/UMW%20Participation%20Agreement%20Packet.pdf>.

If transferring an NIH award, the incoming PI will need to have their eRA Commons ID affiliated with UMMS. In order to do this, contact the Office of Sponsored Programs at 508-856-2119 or via email at [research.funding@umassmed.edu](mailto:research.funding@umassmed.edu) and provide us with the Commons ID that requires affiliation.

In most cases, equipment purchased with funds awarded on an active grant will transfer with the PI when changing Institutions. All equipment transfers to UMMS need to be coordinated with the Department of Asset Management

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in the Financial Services Office. The Equipment Transfer/Receipt form can be found on the Financial Services intranet at (<http://inside.umassmed.edu/financialservices/Financial-Forms/>).

For NIH awards, the equipment intended to transfer must be listed on the Relinquishment form (PHS 3734) completed by the prior institution. Asset Management compares the equipment listed on the Relinquishment form with the UMMS receipt form to ensure the same items are included. The equipment should also be included in any new proposal submitted to the sponsor by UMMS as this represents acceptance of the title to the transferred equipment. Once on site at UMMS, the transferred equipment is tagged by Asset Management staff for tracking and inventory purposes.

The incoming Investigator may need to prepare a new proposal (refer to sponsor guidelines) after receiving the unobligated balance for each sponsored project from their prior institution.

The proposal usually consists of:

- A revised budget showing UMMS salaries, fringe benefits, and F&A costs.
- A budget justification.
- A project description that usually consists of a progress report and a description of the work that remains to be completed on the project.
- Appropriate sponsor forms (e.g., PHS)
- Internal Forms with appropriate signatures (listed below).

### **Proposal Routing Form (PRF)**

A routing (transmittal) form is required with every research proposal or agreement. Routing forms for new and competing renewal proposals are generated in PeopleSoft. Please contact your departmental administrator so they can generate the PRF for the incoming project.

### **Summary Disclosure of Financial Interests (SDFI) Form**

Federal regulations and institutional policy require Investigators applying for or receiving federal sponsored research funding to complete a financial conflict of interest disclosure at the application stage. UMMS captures these disclosures via the SDFI form. For the purposes of the disclosure, Investigator is defined as any individual responsible for the design, conduct, or reporting of the results of work performed or to be performed under the sponsored project. This includes, but is not limited to the Principal Investigator, Co-Investigators, and any other individuals (including personnel from other institutions) who are involved in accomplishing project objectives. It may include students, graduate and undergraduate, and other personnel who may be listed as authors on project results, even if they are not paid from the project.

Award transfers most frequently follow one of two options:

#### **Option 1: Full transfer of remaining award to UMMS**

When the remaining award is to be transferred in its entirety to UMMS, the PI's previous employer must formally relinquish the award and provide the sponsor with the unobligated balance. The PI may be required to submit a new UMMS proposal to the sponsor. The sponsor then awards the project to UMMS.

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If a portion of the work will remain at the prior institution they will be required to submit a proposal to UMMS that would be incorporated into the UMMS proposal submitted to the sponsor. Once the award is received by UMMS, a subaward will be negotiated with the prior institution for their component of the project.

### Option 2: Subaward to UMMS

When only a portion of the work is to be transferred, a new principal investigator is named at the former institution (with the approval of the sponsor) and the original PI submits a proposal through RFS to his or her former institution which will then issue a subcontract to UMMS.

### Internal Processing Activities

The Department Administrator and the PI should use the UMMS Incoming PI – Award Transfer Checklist to guide them through the most common requirements that are needed to complete the transfer.

The checklist outlines what is needed from the relinquishing Institution (e.g., contact information and grant related documentation) as well as hyperlinks to the compliance offices responsible for reviewing and approving human subject and animal research, biohazardous materials and the use of radioactive materials.

All potential subawards must be submitted to OSP for review/approval. The Proposal Routing Form (PRF), SDFI, budget and justification, scope of work, Letter of Intent or a PHS398 face page are required. Applicable human subject or animal protocols should also be submitted with the proposal packet. This would apply to both incoming and outgoing subawards.

### Provisional Accounts (Pre-Award Account Setup & Spending Authorization)

If the incoming PI needs to access project funds in advance of receiving the award, a New Award Provisional Sponsored Account Request (NAPSAR) Form can be used to request the establishment of a chartfield in PeopleSoft to facilitate the initiation of the sponsored project prior to receiving the award or official notice from the sponsoring agency. New Award Provisional Sponsored Accounts must be secured by an institutional unrestricted account. If an award is not received, or expenditures processed are determined to be unallowable due to the conditions of award, this account will provide the funding sources for these expenditures. The form can be found on the OSP website: <http://www.umassmed.edu/research/rfsform.aspx>.

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Responsibilities	PI	Dept Admin	Research Funding (OSP)	Post-Award Admin & Compliance	Faculty Affairs	Human Resources
Contact the Sponsoring Agency, Department, and OSP in advance of the transfer date	P	S				
Submit Participation Agreement for incoming PI	P	S				
Gather relinquishing documents from previous Institution	P	S	S			
Submit the new proposal/subaward documents to the sponsoring agency	P	S	S S			
Complete FCOI Training and Forms for Investigators identified on each project	P	S	S			
Complete the UMMS Incoming PI-Award Transfer Checklist and initiate the forms/processes needed for any applicable compliance areas (ex. IRB, Equipment etc.)	P	S	S	S		
Initiate subawards off of award transferred to UMMS	P	S	S			
Setup a provisional account for projects in advance of receiving sponsor agreements	S	P	S	S		
Initiate any new faculty and staff appointments with payroll/benefits	P	S			S	
Initiate any new staff appointments with payroll/benefits	P	S				S

KEY	
P =	Primary Responsibility
S =	Secondary Responsibility