Award Transfer Process Overview.

Awards granted to Temple University by Sponsors rely on the expertise of the Principal Investigator (PI) overseeing the project. If the PI becomes unavailable due to a change in focus, leave of absence, or position change, Sponsors must be promptly notified in writing by the Division of PreAward. Certain agencies, like the NSF and NIH, require institutional signatures or electronic submissions for these notifications. This ensures the Sponsor can determine whether another Temple PI can fulfill the project's objectives or if the project should transfer with the PI to another institution. Failure to notify Sponsors can result in significant financial and compliance issues for both the department and the University.

If a PI plans to leave an organization during the awarded period of performance of a grant and/or contract, the organization has the prerogative to nominate a replacement PI, request that the grant be terminated, or transfer the grant to the PI's new organization. Replacement PIs are subject to sponsor's approval. In those cases where a particular PI's participation is integral to a given project and the PI's original and new organizations agree, a grant transfer request shall be submitted via the sponsor's system and/or e-mail.

This process should be completed at least three (3) months before the award transfer date, but no less than thirty (30) days prior to the PI's departure from Temple University.

The <u>Departing PI - Award Disposition Notification</u> form facilitates notifying the PreAward division about a PI's departure from Temple, whether for internal transfers, external transfers, or award terminations. This form should be initiated as soon as departure details are known. For questions or assistance, departments can consult their assigned PreAward staff. Further details and specific guidance can be obtained based on the type of award transfer needed.

Incoming award transfers occur when a PI brings a sponsored award to Temple University from another institution. The previous institution must notify the Sponsor of the transfer intent, and the PI must submit the necessary documentation to formally request the award's transfer. Transferring a PI's awards, whether incoming to Temple or outgoing to another institution, involves collaboration with the Research Administration Office to ensure eligibility and compliance throughout the process. Close monitoring of expenses during this transition is critical to avoid unallowable charges that may be scrutinized by Sponsors or auditors.

Termination of Existing Awards (+)

Transfer of Award(s) to a Different Institution (Outgoing Transfers) (+)

Equipment Transfers (+)

Assigning a new PI/Keeping the Award at the Temple (+)

Pending Proposals (+)

Transfer of Awards to Temple (Incoming Transfers) (+)

Termination of Existing Award(s)

Prior sponsor approval must be obtained from federal and non-federal sponsors if the Principal Investigator (PI) is terminating their award early before the project ends. Possible reasons for early termination include:

- The PI has expended all the awarded funding in compliance with the award terms and conditions.
- The PI has submitted all project deliverables.
- The PI is leaving Temple, and the project will not be transferred or assigned to a new PI.
- The sponsor has requested an early termination.

Procedures:

Principal Investigator must complete the <u>Departing PI - Award Disposition Notification</u> form. Please note that the entire portfolio of grants/contracts, whether terminating, transferring to another PI or to another organization can be done on the same form.

Once the form has been signed by all appropriate parties, the PreAward Office within Research Administration will notify the sponsor. When approval to terminate these awards are in hand, the PreAward office will ensure that all documents have been uploaded into the ERA proposal/award record and to change the status of the record to "Closed".

Important to note: In the event of early termination, all required reports (e.g., financial, technical, property and patent), must be provided to the sponsor. Departments should also be mindful of whether an early termination may negatively impact the sponsor's willingness or contractual requirement to make final payment on outstanding invoices.

This process should be completed at least three (3) months before the award transfer date, but no less than thirty (30) days prior to the PI's departure from Temple University.

Transfer of Pending Proposals and Active Award(s) to a Different Institution (Outgoing Transfers)

Pending Proposals

When leaving Temple University, a PI may have pending proposals that have a chance of being funded, or that they wish to formally resubmit from their new institution. Some sponsors require that Temple University relinquish their interest in these proposal(s), so that if funded, the new institution will receive the award; or if not funded, the PI and the new institution my pursue a formal resubmission. Contact the PreAward office, if the sponsor requests a letter relinquishing your proposal to the new institution.

Active Awards

Procedures

Approval: Once the PI knows that they will be requesting an award to be transferred to a new institution, the following Award components must be reviewed by the Department or School level Business Administrator and the PI to ensure that all compliance requirements are met according to the terms and conditions of the Award. Not all documents and/or reconciliations need to be submitted or reported to OVPR Research Administration with the Departing PI – Award Disposition Notification form, only those indicated as being required.

This process should be completed at least three (3) months before the award transfer date, but no less than thirty (30) days prior to the PI's departure from Temple University.

The Principal Investigator along with their Business Administrator must conduct this review:

Component	Requirement
Budget	Consider using the awarded budget per the sponsor's guidelines to
	reconcile the account as close as possible to the end of the period. If
	there are no funds remaining in the award account, but out year
	increments remain; determine the approximate amount to be relinquish
	to other institution. We request that you build into your approximation
	a 5 -10% amount for unknown trailing costs.
Cost Sharing	Note that if the PI's original award was submitted in response to a
Commitments	program solicitation that required cost sharing as part of the award, this
	cost sharing requirement also must be addressed by the new
	organization in the budget portion of the transfer request. The cost
	sharing will be reflected as a condition in the award at the new grantee
	organization, if applicable.
Equipment	As noted in the Notification form, you must Include a list of equipment
	that is transferring to the new institution.
Effort Reporting	Ensure that all effort for the current PI to date has been completed in
	ERS.

Export Controls	If project involves export controls follow the export controls guidance and discuss EAR, ITAR, Software, Data Sharing /Data Use Agreements or other issues that may impact the transferring of award.
Foreign Institutions	If award is to be transferred to a foreign organization agency, confirm that the sponsor allows awards to be transferred to a foreign institution, if applicable [Non-US Federal Foreign]
IACUC Approvals	Additional information may be required for certain types of proposals, such as those involving vertebrate animals. Such proposals may require supplementary documents be submitted in conjunction with the transfer request, if applicable
Inventions/Patent Reports	Submit all final patent reports for PI and subrecipients
IRB Approval	Additional information may be required for certain types of proposals, such as those that involve human subjects. Such proposals may require supplementary documents to be submitted in conjunction with the transfer request. In addition, ensure that the PI will continue to work on human subject's research without interruption. This may require that the PI request his IRB protocols be extended beyond the termination date to ensure that IRB requirements are met. Please refer to the IRB policies and procedures. Contact both respective IRB office for smooth transition of awards.
PI Rights and Appointment	Discuss any special circumstances regarding PI rights and appointment with current and other institution
Period of Performance (POP)	Discuss if there will be any gaps in the Period Of Performance between the time the PI's appointment ends and PI start at the new Institution, if applicable
Personnel (i.e., Postdoc & Grad Students)	Discuss how all personnel will be handled or transitioned as part of the early termination or PI transfer, if applicable
Relinquishing Statement and/or Final Figure	Assist in completing the relinquishing statement as required by sponsors and reconcile the accounts and determine the final figures, as applicable
Reporting Requirements	Ensure that all Final Financial and Progress Reports are submitted to sponsor
Subrecipients	If the award has a subrecipient component, assist in helping to provide information to PreAward to issue amendments to terminate subs and request final invoices.

Once the review of the components above has been completed, and no less than 30 days before the Principal Investigator is to leave, the <u>Departing PI - Award Disposition Notification</u> form must be completed and submitted with the PI signature, and the signature of the Associate Dean for Research which indicates College/School approval of this transfer to the Office of the Vice President for Research (<u>OVPR@temple.edu</u>) for final review and Institutional approval. Please

note that the entire portfolio of grants/contracts, whether terminating, transferring to one or more PIs or to another organization can be done on the same form.

If approved for transfer to the new institution, each transferring award will be handled on a case-by-case basis in accordance with the sponsor's instructions. Included below are the steps to be taken for NSF, NIH and other sponsors who do not have a stated process.

Responsibilities

The department must initiate and complete the <u>Departing PI - Award Disposition</u>

Notification form at least three (3) months before the award transfer date, but no less than thirty (30) days prior to the PI's departure. The form requires reconciliation of each project to determine the amount of funding, including direct and indirect costs, to be relinquished by Temple. Also, any equipment that is included with the transfer request, whether part of an active grant and/or contract, must be listed and justified why such equipment transfer is necessary. For more than four (4) FOAPALs, additional details should be attached on a separate piece of paper.

Once completed, the form must be signed by the PI and the Associate Dean for Research. The signed form should then be submitted to the PostAward office for review and confirmation before being forwarded to the OVPR office for final approval. If approved, the OVPR office will forward the form to the PreAward office to begin the notification process to the sponsor.

The PreAward office upon receipt of the notification form will notify via email, Compliance offices of the award transfer, ensuring protocols are addressed with the current PI and school and/or department administration. Once the PreAward office has notified the compliance offices via email, the appropriate actions stated in the notification form will be reviewed and processed..

Meanwhile, the PI is responsible for submitting final technical and invention reports for awards terminating or affected by the transfer and providing copies to the PreAward office. Additionally, the department must manage subrecipients by notifying them, requesting final invoices, ensuring final payments, and submitting a Subaward Request form to terminate the agreements early.

At the new institution, the PI must coordinate with their Research Administration office to handle any Sponsor-required forms and documents. This ensures a smooth transition of responsibilities and compliance with all Sponsor requirements.

Sponsor Specific procedures:

NIH Transfer Procedures

Before initiating paperwork to transfer an NIH grant, the Principal Investigator (PI) must consult with their Program Officer. When the Program Officer has been informed, the PI and/or Department should complete the <u>Departing PI - Award Disposition Notification</u> form. Upon completion of that form which indicates that Temple has agreed to transfer the award to the new

institution, the PreAward office will initiate the <u>relinquishing statement</u> in eRA Commons. The PI and department must also assist the PreAward office in completing the <u>Final Invention</u> <u>Statement and Certification</u>. For details, see the [NIH Grants Policy Statement, <u>Section 8.1.2.7</u>, Change of Grantee Organization]

NSF Transfer Procedures

If a Principal Investigator (PI) plans to leave Temple during their grant period, they must notify their Program Officer. Once the Program Officer is informed, the PI and/or Department administrator will complete the <u>Departing PI - Award Disposition Notification</u> form. Upon completion of that form which indicates that Temple has agreed to transfer the award to the new institution, the PI initiates a FastLane transfer request and electronically submits it to the PreAward Office for review and approval. PI and/or department administrator must follow the <u>FastLane PI Transfer Instructions</u>. Transfer requests cannot be submitted until all expenses have posted. If time and funds remaining are modest, Temple and the new organization may agree to issue a subaward to complete the project, with alternatives discussed with the NSF Grants and Agreements Officer.

Please review your sponsor guidelines to determine if they have a processes for transferring or terminating the awards

If the sponsor does not have specific format/guidelines, use these instructions.

For sponsors without specific transfer instructions, contact your PreAward team with the required transfer information. Sponsor approval is mandatory for all grant/contract transfers. PI and/or department must complete the <u>Departing PI - Award Disposition Notification</u> form. Once the form has been completed, the PreAward office will recommend how to notify the sponsor. But in most cases, The PI and/or Department will draft a letter requesting transfer approval, including the award's identifying details (PI name, title, grant/contract number), transfer effective date, new institution, unexpended balance (direct and F&A costs), and any equipment to be transferred. Submit the letter to the PreAward office for review, approval and submission.

What happens next?

The PI and Research Administration offices will be required to complete final progress reports (PI) and financial reporting (PostAward). PostAward will refund the unexpended balance to the sponsor, if applicable.

In general, when the sponsor approves of the transfer, they will:

• Issue a revised award or modification to the old institution (original grantee) that shows the revised end dates and deobligate the unexpended balance, if any. The deobligation amount is the unexpended balance reported to the sponsor when the transfer was requested. At that time, the Post Award office will complete all Final Financial Reports unless the sponsor instructs them differently.

•	Issue an award to the new institution. The award will include the unexpended balance from the Temple, and may include reference to future funding, if applicable.

Assigning a new PI/Keeping the Award at the Temple

The administering Temple department, in consultation with the Office of the Vice President for Research, has the option of nominating a replacement PI to take over responsibility for the award. If needed, a subaward agreement can be issued to the transferring PI to complete research at their new institution.

The preponderance of activity should determine whether an award is transferred to a new institution and a subaward issued back to Temple, or if the award is kept at Temple and a subaward issues to the new institution. The sponsor must approve either arrangement.

Procedures

Responsibilities

If the PI is leaving and not requesting transfer of the awards currently under their direction and/or the Department, School/College and OVPR determine that the awards must stay at Temple, a new PI must be named. The PI leaving Temple should have discussed this with their Department and their College/School Associate Dean for Research before completing the form. The PI and/or department is responsible for initiating and completing the <u>Departing PI - Award Disposition Notification</u> form. This process should happen at least three (3) months prior to the actual transfer date of the award but no less than thirty (30) days prior to leaving.

Once the form has been approved by all parties, including PostAward and received by PreAward, the PreAward office will consult sponsor guidelines on their policies on PI changes. The PreAward Office will convey that information to the Department and College/School. At that time, the Department will determine whom the new PI will be. Department Administration will complete the Forms and Documentation that are required by the Sponsor and submit to the PreAward office for review, approval and submission. Usually, the change in PI requires the following:

- A formal letter requesting the change of PI.
 - o Biographical sketch of the Accepting PI
 - Current and Pending support of the Accepting PI
 - Justification of why the Relinquishing PI is letting go of the award and identification of the qualifications and capabilities of the Accepting PI to take over the award
 - Other, as specified by the Sponsor's guidelines and/or the Notice of Award (NOA)
 / executed agreement.

Upon receipt of the documentation, the PreAward office will submit the paperwork to the Sponsor.

Note: For NIH grants, the request for PI Change is performed via Commons. For NSF awards, the process is conducted through Research.gov.

Once the documentation has been approved by the Sponsor, the PreAward office will upload all documents into ERA and change the record to the new PI. The documents will then be submitted to PostAward. PostAward will create a child FOAPAL account to the existing record. This new FOAPAL will be assigned to the PI, their Department and College.

Equipment Transfers

Equipment purchased with sponsored funds for use on a specific project normally remains available for use for the duration of the project. Principal Investigators who are continuing the project that included funding for equipment and who will continue the project at a new institution may, with sponsor support, arrange to have the equipment transferred with them. Remember, however, that if the transfer is to an entity outside the United States, an export license may need to be obtained from the United States government. Approval of the Department Chair, Dean and/or Associate Dean for Research, PreAward office, and the Vice President for Research is needed before the equipment may be transferred. All equipment purchased with sponsored funds, state funds, and/or a combination of funding sources require review of sponsor guidelines on ownership and transfer.

- Equipment purchased on grants and contracts may still be titled to the sponsor agency. When this is the case, Temple must obtain sponsor approval for transferring it to another institution.
- Only the Vice President for Research as the Chief Research Offer for Temple, is authorized to give approval for transferring grant/contract-related equipment to another institution.
- Transfers of equipment and technology outside the United States may require prior United States government approval (contact <u>Temple Export Control</u>).
- It is important to begin the approval process early, since it may take time to move the request through the University process and obtain the appropriate government approvals, if required.
- Research equipment cannot be transferred to a for-profit institution, unless approval is given by all appropriate parties.
- Begin the request to transfer equipment to a new institution using the Sponsored Equipment Transfer Form. Please note, the sponsor may have additional forms that may need to be submitted at the time of relinquishing the award. This form will be shared with the Controller's office so that the equipment that has been approved to be transferred will be removed from inventory.

Transfer of Awards to Temple (Incoming Transfers)

For all incoming transfers, the Department must begin the process by routing the new "proposal". The documentation needed to begin this process often involves a letter from prior institution, a revised budget reflecting the updated project needs, and any other Sponsor-required forms. The Sponsor will then review the transfer request to ensure all compliance requirements are met and, if approved, will issue an award to Temple, allowing the project to proceed without interruption.

Proposal Development and Routing

Temple uses ERA for proposal development and internal routing. Any new proposal or incoming award must first be routed in ERA. If the incoming PI does not currently have a Temple ID, they must work with their incoming Department to obtain a Temple ID via Information Technology. The Department will work with the PreAward office to determine what documentation will be needed to submit to the Sponsor for approval and transfer to the award to Temple.

Transfer proposals

Sponsor requirements vary for transferring an award from one institution to another. The following information is helpful for determining sponsor requirements and entering the proposal in ERA:

- Copies of current award documents (grants or agreements) for all active awards
- Copies of the most recent proposal or progress report
- Contact information for each sponsor (if not included with award document)
- Information about pending proposals that are likely to be funded
- Contact information for the institutional sponsored programs representative at the former institution

A proposal must be routed for each transferring award. In addition, if you will receive a subaward from your former institution for ongoing collaborative work, you will need to route the scope of work and budget for each of those projects as well.

Budget and Financial Issues for Transferring Awards

Work with your department administrator to develop budgets for each of the awards to be transferred. The PreAward office can provide guidance regarding sponsor policies or Temple procedures, but responsibility for budget development rests with the department.

• Budget period: Usually from date of transfer to Temple through the end of the current budget period for the award.

- Budget amount: Total amount (direct plus F&A costs) on these transfer applications should equal the total amount of unobligated balance that will be reported by the former institution (amount remaining at time of termination from former institution) for the current budget period.
- Temple facilities and administrative (F&A) costs must be used within the budget, even though the rate will be different than the prior institution.
- Temple fringe benefit rates must be used even if the rate is higher than the previous institution.
- Effort commitment: The percent effort (person-months) committed by the PI and by any key personnel who will remain on the budget should be consistent with the effort committed in the original proposal, unless a reduced percent effort has been approved by the sponsor. This is essential for federal awards and many foundation-funded awards; for other projects, discuss questions or concerns with the PreAward office.
- Proposed subawards: A completed subrecipient form, budget, budget justification,
 Attachment 3b page 1 and 2, Biographical Sketch of all key personnel and scope of work
 are required from each proposed subrecipient. Please note, the sponsor may require other
 documents no listed here. For federal proposals, if the subrecipient has a federal
 negotiated F&A rate agreement, the subrecipient must also provide a copy or a link to the
 document as noted in the Subrecipient commitment form

Award Set up

The Award set up will follow the procedures set forth when a new award is received at Temple. The PreAward office in connection with PostAward office will review the NOA and set up the award in ERA and in Banner.