

SPA Internal Procedure Name: Award Relinquishment/Transfer Procedure	Effective Date: June 26, 2008
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PURPOSE

When a Principal Investigator (PI) announces his resignation from OHSU, sponsor approval is required for the transfer of legal and administrative responsibility of affected sponsored awards. If OHSU decides a suitable replacement for the investigator cannot be found, the PI has the option to transfer the award to another institution or to terminate the award. The roles and responsibilities of parties involved for a PI transfer to a new institution are defined below.

RESPONSIBILITIES

Principal Investigator (PI)

The Principal Investigator is responsible for notifying the appropriate parties and supplying those parties with necessary information in a timely manner, review and approval of estimated amount of award to transfer, review of equipment requested to transfer, and the submission of certified effort (if applicable), technical and invention reports.

Department/Unit Administrator

The Departmental staff is responsible for working with the PI to supply SPA with the estimated award amount to transfer, certified effort report (if applicable) and requested list of equipment to transfer.

Sponsored Projects Administration (SPA)

SPA is responsible for facilitating the transfer process by coordinating with the PI, Department, other OHSU units, and new institution, as needed, to ensure all requirements within the relinquishment process are met.

PROCESS

Initial Notification

1. Department or PI informs the SPA Analyst and the Sponsor's Program Official as early as possible that a PI is transferring and provides information regarding the date of transfer, what awards the PI expects to transfer, and the name of the new institution. The transfer/relinquishment date should be the last date the PI is to be employed with OHSU to coincide with the day significant programmatic interest is no longer performed at this institution. If some work is expected to continue after the PI has left OHSU, the PI should work with the new institution and Research Grants & Contracts (RGC) to establish a subaward as a mechanism for reimbursement for any expenses incurred at OHSU after the relinquishment date.
2. The SPA Analyst will facilitate the transfer process, based on receipt of the above information, by coordinating with the PI and other OHSU units to assemble and submit the necessary documents required for the transfer.

Equipment Transfer

3. If the PI is expecting to transfer equipment to their new institution, the Department or PI will follow the instructions outlined in the Fixed Asset Guidelines.

4. The SPA Analyst is responsible for reviewing the applicable sponsor's equipment disposition guidelines to ensure OHSU has the authority to transfer equipment indicated. The Analyst will initial next to the SPA Director's signature on the equipment relinquishment letter, forward for the Director's signature, and return to Fixed Assets for processing.

Grant Transfer

5. The SPA Analyst will perform an analysis of the PI's portfolio, determine the transfer procedure, if a set transfer procedure for the sponsor exists, work with the Department to estimate the account expenditures at the time of the transfer (plus ten percent), and ask the Department which accounts the Chair will agree to be transferred. The department will work with RGC if there are any subawards that need to be terminated.
6. The PI will submit all non-financial documents requested as soon as possible. This may include, but is not limited to a progress report, final invention statement, certified effort report, as well as any award application documents required to be submitted from the new institution.
7. The SPA Analyst will prepare the relinquishing documents in accordance with sponsor requirements or use the Non-Federal Relinquishment Letter if the sponsor does not have an established transfer procedure. Completed documents are sent to the PI and Department allowing five days grace before assumed concurrence, and then submitted to the corresponding sponsor immediately. The SPA Analyst maintains contact with each sponsor and PI to ensure documents are received and processed in a timely manner. The PI should be kept informed of the progress as needed.
8. Once the sponsor has officially relinquished the award, the SPA Analyst will prepare and submit all final financial reports and close the OGA award.

SELECTED GUIDANCE FOR SPECIFIC TASKS

DHHS

Department of Health & Human Services (DHHS), requires the following forms:

- Form PHS3734 ("Relinquishing Statement") – sample attached
The Department provides a reasonable estimate of the unexpended balance to the SPA Analyst. The SPA Analyst completes the form and electronically sends it to the Department and PI for concurrence. Upon actual, or assumed concurrence after a five day grace period, the form is initialed by the SPA Analyst and given to the Director of Sponsored Projects Administration for signature as the Finance Office. Upon return, the form is then taken to RGC for signature from the Manager/Director as the Official Authorized to Sign Application. Once all signatures have been obtained, the SPA Analyst submits the form to the Grants Specialist.
- Form HHS568 (Final Invention Statement) – sample attached
SPA Analyst emails form to PI, requests its completion, and asks that the PI sign the form and return it to the SPA Analyst. The SPA Analyst then takes the form to Technology & Research Collaborations (TRC) for review and signature from the Director, as the Official Authorized to Sign on Behalf of the Institution. Once both signatures have been obtained the SPA Analyst submits the form to the Grants Specialist.

NSF

National Science Foundation (NSF) requires relinquishment information be submitted online via FastLane. NSF will consider the amount estimated for transfer as the final. If final expenses are underestimated, NSF expects OHSU to contact the new institution for reimbursement.

Contracts and Subcontracts/Subawards

Contracts and subcontract/subawards will need to be amended to reflect the new end date. The department should work with RGC to submit amendments to the sponsor to terminate the award. If the award will be transferred, the PI will need to work with the new institution to initiate a new agreement.

Subouts

All work subcontracted out to another institution will need to be terminated if the award is ending or will not stay with OHSU. The department will need to work with RGC to have any subouts terminated.

Not Specified

When a sponsor does not have a specified relinquishment procedure, the SPA Analyst will prepare and submit a Non-Federal Relinquishment Letter. The SPA Analyst should contact the sponsor to verify there is no set procedure before the relinquishment letter is submitted, as most agencies will require additional information.

SPA Unrestricted

Program Development Accounts will not be transferred to another institution, including a Foundation. Any remaining funds will be transferred to the Departmental PDA. The SPA Analyst should notify the PDA SPA Analyst of the PI's departure for action.

New Awards/Renewals

Occasionally, a new award or project will be scheduled to start near the time the PI is terminating.

- Account Setup, No Activity - If an OGA account has been setup, but no activity has occurred due to the PI's transfer, the SPA Analyst should contact the sponsor to see what the relinquishment process is. If the sponsor does specify that documents need to be submitted, the SPA Analyst will close the project in OGA. If the sponsor requires documentation, the SPA Analyst will request the project be put on hold, prepare and submit the documents, then close the OGA project.
- Renewals – If the PI is terminating on the last day of the budget year in a competitive segment, the SPA Analyst will request a Partial account not be setup, if possible. All relinquishment documents and information will be kept in the prior year's file, even if it is related to the next budget year.

- New Award - If the application is in RGC and has not been sent to SPA, the SPA Analyst should not take action unless requested by the sponsor. If the sponsor requests relinquishment paperwork be submitted, the documents will be kept in RGC's file instead of SPA setting up a new OGA project that wouldn't be referenced for post award activities.

Balance Estimation

Because the Department or PI should be aware of any unposted charges, such as vacation cash out, it is the Department or the PI's responsibility to supply the SPA Analyst with a reasonable estimate of the unexpended balance to be provided on the relinquishment paperwork. It is recommended that ten percent is added to the estimated balance to account for any additional unforeseen charges that may post. Although this is an estimate, the amount should be the lowest likely balance as of the date of the transfer. Since this amount may be transferred to the new institution before the final FSR is submitted, reporting an unreasonably high balance can lead to a shortfall of funding at OHSU. While a final balance higher than estimated on the Relinquishing Statement will be transferred to the new institution, it may not be possible to recover costs resulting in a balance lower than estimated on the Relinquishing Statement. In the event the Department does not provide the balance estimation in a reasonable amount of time, the SPA Analyst will prepare an estimate, and send it to the Department and PI for approval. If a response is not received within five business days, the SPA Analyst will assume concurrence.

Changes to OGA

The SPA Analyst should have the end dates changed on all awards to be transferred as soon as a date is known, so that spending will be stopped. The change is done via the Internal Change Form; please attach any documentation that verifies the termination date. In the case of NIH, a copy of the relinquishment letter would suffice.

Relinquishments on Closed Awards

For any transfer of equipment that was purchased on an award that is now closed, the relinquishment must be co-signed by both the CFO and SPA.

RELATED DOCUMENTS

PHS 3734

HHS 568

Equipment Transfer Request Form

Relinquishment/Transfer Letter

Non-Federal Relinquishment Letter

Internal Change Form

Relinquishment Tasks Matrix

REVISION HISTORY