

Procedure for NIH Grant transfers to the Division of Biology & Medicine at Brown University from another Institution

I. General Guidelines

This document describes the procedures associated with the transfer of a grant to Brown University for a newly hired Principal Investigator (PI). This guidance should be used in conjunction with the specific terms and conditions of award.

II. Reason for Procedure

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

III. Transfer of an Award to Brown University from the Original Recipient/Awarding Agency

Transferring a research grant from another institution to Brown University requires coordination between the incoming PI, the original grantee institution, the funding organization (NIH, for example) and Brown University. 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 Brown.

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 Brown University administrative requirements (including IACUC and IRB approvals) before research on the transferred award can fully begin. It is critical that the process of transferring grants is initiated as early as possible after the investigator commits to moving to Brown University.

In most cases, equipment purchased with funds awarded on an active grant will transfer with the PI when changing Institutions. All equipment transfers to the Division of Biology and Medicine need to be coordinated with the Director, Office of BioMed Facilities, Planning and Operations (Tel # 863-2483) and the Property Compliance Manager in the Office of Sponsored Projects (Tel # 863-2777).

For NIH awards, the equipment intended to transfer must be listed on the Relinquishment form (PHS 3734) completed by the original institution. The equipment should also be included in any new proposal submitted to the sponsor by Brown University as this represents acceptance of the title to the transferred equipment. Once on site at Brown University, the transferred equipment is affixed with an asset tag for tracking and inventory purposes.

Steps for Transferring a National Institute of Health (NIH) Grant

The original grantee institution must submit the following:

1. Relinquishing Statement (PHS Form 3734) or signed letter in lieu of the form (only if transfer is taking place prior to award of competitive application). If applicable, include a list of equipment that is transferring to the new institution. The relinquishing statement gives information about the date the investigator proposes to leave the old institution and proposes to start at the new institution. It provides an estimated amount of funds to be relinquished in the current grant year. The relinquishing statement can be completed and submitted in hard copy using PHS form 3734 or via [eRA commons](#). If submitted via Commons contact email for the Division of Biology and Medicine is Mary_Norton@brown.edu
2. Final Invention Statement (PHS Form 568)
3. The Final Financial Status Report (FSR) (SF 269) is required for grant closeout and is due 90 days following the termination date of the project at the original institution.

Brown University must submit the following:

A Transfer application can be submitted electronically via the Change of Grantee FOA [PA-18-590](#) if the current award activity code has transitioned to electronic submission process. If the application has not transitioned then submit using the paper-based PHS 398 Application. The incoming PI will need to have their eRA Commons ID affiliated with Brown University. In order to do this, complete the [Brown University eRA Commons User ID Request form](#).

The following variations to standard electronic submission instructions apply to transfer applications:

SF 424 (R&R) Cover Form Change of grantee organization applications submitted electronically should have the grant number (e.g. CA987654) of the current award entered in Field 4 (Federal Identifier); be marked as a "Revision" in Field 8 (Type of Application) on the R&R Cover Page, and then mark "E. Other" and insert "Change of Grantee Organization" in the corresponding text field.

PHS398 Research Plan Form Change of institution applications must include a statement indicating whether the overall research plans/aims have changed from the original submission. If the overall research plans/aims have changed, provide updated information. If the overall research plans/aims have not changed, provide the original research plans/aims. If transferring on the anniversary date, include the progress report for the current year that includes a statement regarding the goals for the upcoming year. If transferring during the budget period (i.e., a mid-year transfer), contact the awarding IC to determine if a progress report is required. If required, the progress report should be included in the Research Strategy section.

Senior/Key Personnel Profile Form Include updated biographical sketches for the PD/PI and existing senior/key personnel, biographical sketches for any proposed new senior/key personnel, and updated "other support" page(s) as necessary.

SF424 Other Project Information Form Human Subjects section: Provide OHRP assurance number and IRB approval for the new organization, if applicable; Vertebrate Animals

section: Provide OLAW assurance number and IACUC approval for the new organization, if applicable; Facilities & other Resources: Include probable effect of the move on the project; Equipment: Include detailed list of any equipment purchased with grant funds to be transferred to the new organization (inclusion of this list in the transfer application from the new organization indicates its acceptance of title to that equipment);

R&R Detailed Budget Form the R&R Detailed Budget form must be used, regardless of the form used for the initial application for current award. The budget should be based on the direct costs relinquished by the original grantee organization, unless otherwise instructed by the awarding IC. Even if the budget for the original award was submitted in a modular format, the R&R Detailed Budget form must be used for an electronic application for change of grantee organization. For these awards, grantees may either complete all of the fields in the R&R Detailed Budget as appropriate or, they may complete only the costs for the PD/PI (Section A), and include the remainder of the direct costs under Section F (Other Direct Costs) Item 8, and Section H (Indirect Costs).

Important to Note: Generally, the negotiated F&A cost rate on file with the DHHS for the new institution will be applied to the direct costs for the grant, regardless if the rate is higher or lower than that of the old institution. If there are major increases in F&A costs in the current grant year, increases in the award will be contingent upon availability of funds. Future year F&A costs will be provided at the appropriate negotiated

Division review and approval

All proposals must be routed and approved via COEUS, Brown's grant management system 5 full business days before the sponsor due date. COEUS allows system-to-system submission of grants.gov applications and serves as the grant/contract repository for all application and award information at Brown University. Investigators should work with their departmental grant coordinator & BioMed Research Administration staff to complete Sponsor proposal requirements and institutional requirements in COEUS.

Documentation Checklist when transferring award to Brown University

Principal Investigator _____	eRA Commons ID: _____	Brown University Start Date: _____
Sponsoring Agency _____	Agency Award No. _____	

Relinquishing Institution Information

Institution Name: _____	Administrative Contact: _____
Date Award will be relinquished: _____	Contact Phone: _____ E-mail: _____

Relinquishing Institution Documentation

- | | | |
|----|--------------------------------------------------------------------|--------------------------|
| 1. | Copy of original proposal | <input type="checkbox"/> |
| 2. | Copy of original award notice | <input type="checkbox"/> |
| 3. | Copy of latest progress report | <input type="checkbox"/> |
| 4. | Copy of Relinquishment letter or signed agency relinquishment form | <input type="checkbox"/> |

Compliance Information

	YES	NO
Are Human Subjects Involved? If yes, contact the IRB to begin the protocol review and approval process.	<input type="checkbox"/>	<input type="checkbox"/>
Are Vertebrate Animals involved? If yes, contact the IACUC Office to begin protocol review and approval process.	<input type="checkbox"/>	<input type="checkbox"/>
Does project involve biohazardous materials/recombinant DNA? If yes, contact the EHS Office for assistance.	<input type="checkbox"/>	<input type="checkbox"/>
Does the project involve the use of radioactive materials? If yes, contact the Radiation Safety Office .	<input type="checkbox"/>	<input type="checkbox"/>
Brown faculty and investigators must comply with Brown's FCOI policy. The policy and forms are available at: Brown's Conflict of Interest Policy . Additionally NIH investigators must complete FCOI training prior to engaging in NIH funded research. Brown will confirm that the required FCOI training is current for all identified Investigators. Training must be current before the award can be approved for set up.		

Subaward/Subrecipient Information

	YES	NO
Will the incoming grant transfer require any subawards? If yes, identify below.	<input type="checkbox"/>	<input type="checkbox"/>
Subrecipient 1: _____ Contact: _____ E-mail: _____		
Subrecipient 2: _____ Contact: _____ E-mail: _____		
Subrecipient 3: _____ Contact: _____ E-mail: _____		

Material Transfer Information

	YES	NO
Will any material(s) be provided from the original institution? If yes, please contact Industry Engagement and Commercial Venturing (IECV) to initiate the transfer of the materials.	<input type="checkbox"/>	<input type="checkbox"/>

Equipment Information

	YES	NO
Will any equipment be transferred from the prior institution? If yes, provide a list and include said equipment in relinquishing statement	<input type="checkbox"/>	<input type="checkbox"/>

Transfer Application Consisting of the following elements

1. Application face page/cover page
2. Updated Project Performance Site Primary Location information.
3. A progress report for the current year, including a statement regarding the goals of the upcoming year. This is required for anniversary transfers and is strongly encouraged for mid-year transfers.
4. A statement concerning the current research plan and an indication of whether the original plan has changed. If changed, appropriate details should be provided.
5. If the application involves Multiple Principal Investigators, include a revised Multiple PD/PI leadership plan indicating how the transfer will affect the governance and organization of the leadership team.
6. A resources page including a description of the facilities at the new institution and the probable effect of the move on the project.
7. Budget pages. If the grant is transferring in the middle of a budget period, a partial year direct cost budget, at the relinquished direct cost level is required. For grants transferring on their anniversary date, a full year budget, at the committed direct cost level is required. Future year budget pages should also be provided at the committed direct cost level.
8. Updated biographical sketches for PI, existing Key personnel and for any proposed new key personnel.
9. Updated other support pages for all key personnel, if applicable.
10. Human and Animal Assurances and IRB and IACUC approval dates.
11. Human subjects education certification for key personnel, if applicable.
12. A list of equipment, as presented on the old institution's Relinquishing Statement, to be transferred. Such a listing in the application represents acceptance of title to the transferred equipment.
13. If project involves subawards, provide LOI, budget, justification and SOW for each.
14. If original award had cost-sharing senior officer approval of how that cost-share will be fulfilled at Brown is needed.