



Principal Investigator/Project Director Transfer Policy

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Effective Date: April 3, 2007
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Issuing Authority: Vice President for Research and Compliance
Responsible Offices: Office of Sponsored Programs/Research Administration, Academic Department, and Grant Contract Accounting

Purpose:

To provide guidance regarding the transfer of a sponsored program in instances of a Principal Investigator/Project Director (PI/PD) that transfers one or more awards to or from Howard University and all related entities, business units, subsidiaries and affiliated organizations including, but not limited to, Howard University Hospital (hereinafter referred to collectively as “Howard University”).

Policy:

It is Howard University policy to allow the transfer of externally funded sponsored program awards to or from Howard University with the consent of the award sponsor, the PI/PD’s Howard University school/college Dean, and the Office of Sponsored Programs Manager. Externally sponsored programs are typically awarded to an institution, not directly to a PI/PD. Therefore, it is within the discretion of Howard University to determine whether to retain, relinquish, or transfer an award to another institution in instances in which a PI/PD elects to transfer to another institution.

Business Process Description:

If a PI/PD is transferring to/from Howard University, an institutional decision is made regarding whether to transfer to the sponsored program. Some awards are less likely to be transferred. These may include awards that support a number of investigators (such as a Center Grant or Program Project) and awards that provide more general institutional support (such as Ruth L. Kirschstein National Research Service Awards). Additionally, sponsors may decline to transfer awards that are near the end of the budget period or project period. In addition, awards with increments yet to be funded can be approved, and then the award is transferred. The Sponsored Programs Office (SPO) helps to interpret the specific terms and conditions of an award related to the transfer and facilitates any necessary discussions to complete a desired transfer. The processes for transferring sponsored programs to/from Howard are described below.

PI/PD Transfers From Howard University

For cases in which a PI/PD is transferring from Howard University and the award is NOT expected to follow the PI/PD, the sponsoring agency is contacted with a request to change the project’s PI/PD.

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Principal Investigator Transfer

If the transfer of a sponsored project from Howard University is desired, the PI/PD requests the approval of the Dean as well as the SPO Manager. To request this transfer, the Dean/Department Chairperson submits a OoR Ticket, selecting PI Transfer OUT, and attaches and/or provides disposition information related to all active awards requested by PI.

The sponsor's Grants Management Specialist or Contracting Officer should be contacted by SPO at the initial stage of the transfer process. This ensures that any complications or concerns are addressed in a timely manner. When the approval of the transfer of the sponsored award is obtained, SPO coordinates the transfer process with the sponsor and the receiving institution. This process typically involves terminating the research award at Howard University (see [Award Closeout Policy](#)) and the subsequent awarding by the sponsor of a new grant or contract to the receiving institution. As necessary, SPO coordinates with the PI/PD and assists with any of the sponsor's concerns during this process.

When the PI/PD transfers the award from Howard University, he/she is responsible for the following tasks:

1. Contacting SPO, as soon as possible, preferably several months prior to the anticipated transfer so that SPO can begin the transfer process, including contacting the sponsor's Grants Management Specialist or Contracting Officer.
2. Notifying the Department Chair and the Program Officer at the awarding agency of the anticipated transfer.
3. Discussing any technology or intellectual property developments with SPO.
4. Reviewing the original award documentation for sponsor requirements, including cost sharing requirements. NOTE: This information is also reviewed and approved by SPO prior to submission of the request to the sponsor to relinquish the award.
5. Determining the amount of the cost sharing commitment to be transferred to the other institution, with guidance from SPO.
6. Working with SPO to close out any subcontracts or other agreements related to the award.
7. Completing the OoR Ticket and obtaining appropriate all required approvals.
8. Completing any relinquishing forms required by the sponsor and submitting to SPO one or more of the following forms as it relates to the sponsored program:
 - NIH (PHS) – PHS 3734: "Official Statement Relinquishing Interests and Rights in a Public Health Service Research Grant." (<https://grants.nih.gov/grants/phs3734.pdf>)
 - NSF – NSF 1263: "Grant Transfer Request"
 - All other funding agencies: Signed agency/corporation/foundation forms as identified by the agency

NOTE: A relinquishment form typically includes the date of relinquishment, the estimated unexpended direct and F&A cost balances from the current budget period, and a statement of intent concerning the transfer of equipment. **This amount should include any expenses, and the applicable F&A cost, that have not been posted. Failure to do this will delay the**

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relinquishment of the award. The relinquishing forms are reviewed and approved by SPO prior to submission to the sponsor. The amount to be transferred must be agreed to by all parties and is final once the transfer action is approved. There are no changes to the amount transferred once it's been approved by the cognizant sponsors' grants officer.

9. Submitting the Final Invention Statement and Technical Report to the sponsor.

The PI/PD transferring to another institution or college may want to take the equipment provided under a grant/contract to the new laboratory and, under certain circumstances, may be permitted to do so. Title to most equipment purchased under a U.S. government grant, cooperative agreement or contract normally vests in the sponsoring agency, and thus approvals to transfer the title of this property are sought from the sponsoring agency. All such requests and approvals are channeled through SPO. The PI/PD creates a list of the equipment purchased during the award period and obtains approval from the Dean authorizing the transfer.

If at any time during the transfer process SPO or the PI/PD's college/school identifies open issues related to the award to be transferred or related subcontractors, these parties work together to resolve the issues. When SPO and the PI/PD's college/school reach a resolution related to these open issues, the RA circulates the resolution to all relevant parties, including the PI/PD, SPO, and the new institution, if applicable.

SPO prepares a final financial report and coordinates with SPO to ensure that all amendments and final invoices are received from subcontractors, if any, before the final financial report is submitted. **All normal award closeout policies apply.**

Note: NSF will waive the final project report requirement at the time the transfer is approved. The reporting requirements convey to the new award transfer and institution.

PI/PD Transfers To Howard University

In instances in which a PI/PD transfers to Howard University from another institution, it is within the discretion of the originating institution to transfer the sponsored program. If the transfer is authorized by the originating institution and the sponsor, the PI/PD transferring into Howard University is required to follow the proposal submission policy and the award acceptance and set-up policies. **All policies governing new awards apply.** Dean or Dean's office submits an OoR Ticket, selecting PI Transfer, and includes all contact information for PI, PI's old institution contracting office, and hire details (if available). SPO and PI coordinate with PI's previous institution to complete all necessary paperwork and award transfer requirements.

The Dept. Chair and Dean review and approve the proposal including the change of institution request in Cayuse. (See Proposal Development & Submission Policy and Award Acceptance & Set-up Policy for further guidance.

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The PI/PD transferring to Howard University must submit the appropriate documentation in compliance with the Proposal Development and Submission Policy:

- A complete proposal
- An application to Seek Off-Campus Funds form to SPO
- Any required institutional clearances (e.g. IRB, IACUC, and Biosafety) to the institutional committee for approval
- All other requirements of the Proposal Development and Submission policy

In accordance with the sponsor's procedures, SPO will generally submit a new application to the sponsor formally requesting the award and the remaining funds. This application may not generally be processed until the original institution has submitted their *relinquishing statement*. SPO maintains a copy of the *relinquishing statement* in the award file.

In response to Howard University's application, when a transfer of a sponsored program is received, SPO will obtain an award notice from the sponsor reflecting the fund balance of the award being transferred. If so, the award is processed in accordance with the Award Acceptance, Negotiation and Set up Policy. Prior to this, if SPO has a strong indication that the sponsor intends to transfer the award to Howard University, the PI/PD may submit a request for an Advance Account (see Advance Account/Pre-award Spending Policy for further guidance).

Roles and Responsibilities:

Academic Department

- **Principal Investigator/Project Directors (PI/PDs):** The PI/PD has the ultimate responsibility for providing transfer information to the Dean and SPO personnel, to ensure that the transfer of an award is completed and in accordance with all applicable Howard University policies as well as federal and sponsor requirements. The PI/PD is responsible for ensuring all applicable expenses have been allocated to the project prior to relinquishment. The PI/PD is also responsible for completing any required technical reports.
- **Dean/Department Chairperson:** The Dean and Department Chairperson complete and submit the OoR Ticket, along with all sponsor-required forms, to SPO for the appropriate approvals.

Sponsored Programs Office (SPO)

SPO reviews and provides institutional endorsement for each sponsored program transfer. SPO participates in the initial meetings with the PI/PD transferring to Howard University and discusses the steps required to transfer all or some of his/her awards. SPO provides institutional approval for all transfers. SPO reconciles the financial aspects of the awards and completes the final financial statements as quickly as possible after termination of the award. **All outstanding concerns about the transfer amount must be finalized before the transfer is submitted to the sponsor for concurrence.**

Related Processes/Events:

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- Financial Status Reports Policy
- Award Closeout Policy
- Accounts Receivable Policy
- Residual Funds Policy
- Proposal Development and Submission Policy
- Award Acceptance, Negotiation and Set-up Policy
- Equipment Management Policy

More Information at:

- Office of Research Website: [Sponsored Programs | Howard University Office of Research](#)
- Support at OOR ticket System: <https://ticketingresearch.howard.edu/ticketingsystem/>