



## **THINKING OF MOVING: A GUIDE FOR TRANSFERRING AN NIH GRANT TO A NEW INSTITUTION**

It is not unusual for NIH funded Principal Investigators (PIs) to move from one institution to another. We fully expect that these changes provide positive value to the research projects supported by the NIH. However, these moves may cause challenges for the PIs, their institutions, and the NIH. In order to help make moving easier, we encourage you to keep the following suggestions and best practices in mind when considering transferring a grant.

**Notify the NIH program official and grants manager of the proposed move as soon as possible.** NIH prior approval is required for the transfer of a grant, so discuss your planned move with your program officer and grants manager. As soon as the NIH is informed of the proposed move, plans can be made to process the transfer in the most efficient manner. Your grants manager will be your advocate and help walk you through the NIH administrative process. This notification should happen at least three months prior to the date of transfer. Any notification after this time may cause delays which could adversely impact the research.

**Close out the grant at the old institution before moving.** The grant belongs to the grantee institution and they have the right to either relinquish it or to keep it and name a new PI. Therefore, it is prudent to deal with issues affecting the old institution while you are still there. You and your institution should be in clear agreement as to how much of the grant funds have been spent and how much they are relinquishing. Discuss what equipment will be transferring with the grant as title to equipment purchased with the grant vests in the institution, and the transfer of equipment to the new institution may be included as part of the relinquishing statement. Otherwise, NIH reserves the right to transfer title to equipment purchased with grant funds to the new institution.

**Consider the timing of a transfer.** Our goal is that your grant funds arrive at your new institution close to the time you begin your new appointment. The cleanest approach to transferring a grant is when the transfer takes place on the anniversary date. Transfers that are proposed within three months of the end of the budget period will generally be negotiated to correspond with the anniversary date. Timing is critical; therefore it is vital that the NIH grants manager be contacted immediately so that funding is not delayed.

Once approval to transfer the grant has been received, NIH will terminate the grant at the old institution on the date of relinquishment and award the next year's non-competing continuation at the new institution on the anniversary date. The old institution will submit a final Financial Status Report, and any unspent funds will be transferred to the grant account at the new institution through the Payment Management System. This type of transfer requires submission of a full progress report in the transfer materials from the new institution and the transfer and the non-competing continuation are done in one step and with one award to the new institution. The old institution will receive a revised Notice of Award reflecting the transfer.

A transfer that occurs other than on the anniversary date is a mid-year transfer. The funds originally awarded to the old institution for a budget period will be split between the old and new institution. Mid-year transfers require the new institution to submit a non-competing progress report 45 to 60 days prior to the next budget start date. Depending on when the mid-year transfer occurs, this may be due shortly after the award of the transferred grant. The transfer of a grant with less than three months left in the project period requires exceptional justification that there are adequate resources and work remaining to warrant the transfer. Only in rare circumstances will NIH transfer a grant in a no-cost extension, or with a small balance of funds remaining.

*Important to Note: Despite the best efforts of all parties, there may be delays in getting the transfer funds awarded to the new institution. Keep in mind that grantee institutions have the authority for pre-award costs, which can cover expenses during that time. Some PIs have commented they found it useful to plan for a short gap in funding when managing their transition and restarting their work. Also keep in mind that transfers occurring to or between foreign institutions require additional approvals and clearances, and therefore take considerably more time to process.*

**Work closely with the sponsored programs office at your new institution.**

Your new institution views the transfer as new support and there are protocols they must follow to properly accommodate the grant. This part of the process is particularly tricky because you will have to manage it from afar. The sponsored programs office can serve as your advocate during the process. You must also remember that if your research requires approvals for humans or animals you will need to request and receive the required approvals before the research can fully begin.

**Submit the entire transfer package together.** Ideally, the submissions should be coordinated so that the old and new institutions submit all of the required documentation in one package. This minimizes the risk that individual pieces will get misplaced or lost and facilitates a timely and efficient transfer. After review and approval of the complete

package, NIH staff will promptly issue the Notice of Awards to the old and new institutions.

The most important factor in the transfer process is timely and effective communication. Timely communication with NIH, your old institution, and the new one is essential to avoid delays and facilitate continuation of the research project. NIH policy does not allow awards to be backdated prior to the date the new application was signed and submitted; therefore, notifying NIH of the move early on will help ensure a seamless transfer. By following these suggestions and best practices as well as the following procedures, the transfer process should be accomplished with a minimal amount of inconvenience and interruption to the goals of the research.

## THE PROCEDURES

NIH prior approval is required for the transfer of the legal and administrative responsibility for a grant-supported project or activity from one legal entity to another before the expiration date of the approved project period.

A complete package of materials is needed in order for NIH to transfer a grant from one organization to another.

The old institution must submit the following documentation:

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.

This form 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.

*Important to Note: The Form 3734 requests “the unexpended balance on the termination date of \_\_\_\_\_ calculated on the basis of the total amount awarded for the grant year.” A common error is to include the total balance from all grant years (including carryover); however, this estimate should come ONLY from funds awarded in the budget period being relinquished.*

*Form 3734 should be completed as soon as possible and always before the PI moves. While some grantees will wait until all charges are cleared, this significantly delays the process. If there is an underestimation of expenditures, the awards will be revised.*

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.

*Important to Note: The FSR should be submitted on time. Its acceptance triggers transfer of unexpended funds to the new institution. FSRs must be submitted electronically via the eRA Commons. See NIH Guide Notice [OD-07-078](#) for additional details on this requirement. Also be reminded that the final Federal Cash Transactions Report (PMS 272) for the grant must match the expenditure information provided on the final FSR.*

The new institution must submit a transfer application, which should be provided in PDF format (preferably 300 DPI resolution or better) to the grants manager at the applicable funding Institute or Center (I/C) at NIH. The application from the new institution should include, at a minimum:

1. Application face page (PHS Form 398) with "CHANGE OF GRANTEE INSTITUTION" typed in capital letters across the top of the page. (Note these form page references still reflect paper submission using the PHS398. Transitioning this process to electronic submission using the SF424 (R&R) is in process; however, no firm transition date is known. Until then, all transfers should continue to be paper submissions based on the PHS398).
2. PHS398 Form Page 2—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. For modular grants, only narrative budget information, including total direct costs and F&A costs is required.

*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 rate.*

8. Updated biographical sketches for new key personnel.
9. Updated other support pages for all key personnel, if applicable.
10. A checklist page, which should include information on the basis for computing F&A costs for the transfer period and all future years.
11. Human and Animal Assurances and IRB and IACUC approval dates.
12. Human subjects education certification for key personnel, if applicable.
13. 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.

Basic procedures for change of institution are also outlined in the NIH Grants Policy Statement at [http://grants.nih.gov/grants/policy/nihgps\\_2013](http://grants.nih.gov/grants/policy/nihgps_2013). Forms can be found at <http://grants.nih.gov/grants/forms.htm>.

## TRANSFER “*TO DO*” LIST

- 1. Inform your old institution’s sponsored programs office of your proposed move
  - Are they willing to relinquish the grant?
  - Any equipment transferring?
  - Consider timing of transfer: will it be a mid-year or anniversary date transfer?
  - Balance of funds remaining to be transferred?
  
- 2. Contact your NIH program officer and grants manager
  - What does NIH need/what are the rules and regulations?
  - Discuss specifics on timing, budget, equipment
  
- 3. Facilitate completion of the relinquishing statement (PHS 3734) and the final invention statement (PHS 568) by your old institution
  
- 4. Facilitate completion of a new application by your new institution
  - IRB reviews, IACUC reviews, human subjects education assurances
  
- 5. Send complete package to the NIH grants manager
  
- 6. Follow-up with the old institution to ensure timely submission of the Final Financial Status Report (SF 269)

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