

SPONSORED PROJECT TRANSFER – IN AND OUT OF UGA



Sponsored Projects Administration
UNIVERSITY OF GEORGIA

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Last Reviewed: 09/23/2022
Owner: Jill Frazier Tincher
Area: Sponsored Projects Admin
Applicability: UGA System-Wide

POLICY AND PROCEDURE

PURPOSE:

The purpose of this policy is to ensure compliance with the standards set forth in the Federal Office of Management and Budget 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), Federal and State regulations, and sponsor-specific requirements. This policy provides guidance which will assist University of Georgia (UGA) personnel proposing, performing, and managing sponsored activities.

Failure to comply with UGA policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities (i.e., research, public service and outreach, instruction, and cooperative extension).

SCOPE:

All UGA personnel must be aware of the complex and detailed rules provided under Federal and State regulations, as well as terms and conditions of individual sponsored activities.

POLICY:

Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific transfer policies. When a PI intends to relocate, he/she must consider each sponsored project and recommend their appropriate disposition. Potential dispositions include:

1. Complete all work and close the sponsored project prior to departing;
2. Recommend the sponsored project transfer to another PI at the existing institution;
3. Recommend the sponsored project transfer to the new institution; or
4. Close the sponsored project without completing all work.

When assessing if a sponsored project should transfer from one institution to another, please consider: when the project is ending; what funds are remaining; if co-investigators are involved; if/how many subrecipients are involved; if graduate students will continue their education at the original institution; and if the project involves unique populations/samples (human subjects, animals, etc.). All of these can influence if the sponsored project transfer should/can occur.

This policy is applicable to the University of Georgia facilitating sponsored project transfers – into and out of UGA – as appropriate.

When a Principal Investigator (PI) intends to relocate **from** UGA and **to** a new institution, it is the PI's responsibility to work with his/her college/school/unit to submit a

request through Sponsored Projects Administration (SPA) for the relinquishment of each sponsored project. Sponsored Projects are awarded to UGA/UGARF, not the PI; therefore, UGA/UGARF have the ultimate authority to determine if the sponsored project is retained or relinquished to the PI's new institution. If it is determined that the sponsored project will transfer to another institution, the PI/college/school/unit will work with SPA to reconcile and close out each project reflective of work/expenses incurred at UGA. Then, SPA will work with the sponsor and new institution to facilitate the transfer. When a PI intends to relocate **from** another institution and **to** UGA, it is the PI's responsibility to provide his/her college/school/unit the necessary sponsored project information. The college/school/unit will work with SPA to provide the necessary documents and approvals. Then, SPA will work with the sponsor and the prior institution to facilitate the transfers.

PIs (Principal Investigators) are encouraged to start the process as early as possible to ensure timely processing and a smooth transition. SPA recommends the PI/college/school/unit consult with SPA at least 120 days in advance of the transfer date to ensure a smooth transition. Sponsor-specific requirements on grant transfers vary widely from sponsor to sponsor. SPA will determine whether the requirements and terms of the sponsored project allow the project to be transferred and then will work with their counterparts to affect the transfer. The transfer process involves various steps and interactions with many stakeholders. As a result, transfers can take approximately 6 months.

DEFINITIONS:

Department Administrator has responsibility for assisting PIs in discharging their monitoring responsibilities, for reviewing invoices from subrecipients, and seeking clarification on questionable expenditures, if/when necessary, and for maintaining appropriate documentation.

Principal Investigator (PI) has primary responsibility for overseeing the scientific and financial aspects of a sponsored project including monitoring subrecipients to ensure compliance with Federal regulations regarding both prime and subrecipient award terms and conditions.

Sponsored Projects are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, Federal/State regulations, and UGA policy. Sponsored Activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service, and other activities.

Sponsor-Specific Requirements include requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

A subrecipient is a third-party, non-Federal entity that receives a subaward from a pass-through entity to carry out part of a sponsored project; but does not include an individual that is a beneficiary of such project. A subrecipient may also be a recipient of other awards received directly from a third-party.

PROCEDURE:

1. Incoming and outgoing PIs are strongly encouraged to review their sponsored portfolio and each sponsor's requirements to identify the recommended disposition for each of their sponsored projects.
 - a. For PIs leaving a prior institution and joining UGA:

- i. PI should provide unit/SPA a list of projects transferring to UGA. This list should include the following information for each project:
 1. Sponsor Name
 2. Sponsor Grant/Contract Number
 3. If cost share obligations remain, the value and type of cost share required;
 4. Date of PI's arrival at UGA;
 5. Amount of unobligated funds anticipated to transfer;
 6. Number/name of subrecipients included;
 7. Copy of the most recent award document;
 8. Copy of the most recent monthly financial statement; and
 9. Name/phone number of grants administrator at former institution.
 - ii. Unit/SPA will collaborate with former institution obtaining necessary information/documents and follow the [UGA Proposal Submission Policy](#) based upon work/funds to be transferred to UGA. PI/Unit are encouraged to request [Pending Awards & Pre-Award Costs](#) and utilize the [Proactivity for Award Set-Up tool](#) which will allow for timely set-up and work to continue and expenses to be incurred while grant transfers are in process.
 - iii. SPA will update PI/Unit on the progress of each transfer. SPA will request additional information/documentation from PI/unit as needed.
- b. For PIs leaving UGA to join a new institution:
- i. PIs prepare and submit a transfer request letter to their dean/chair of the recommended disposition plan. PI/Dean/Chair discuss. This letter should include the following information for each project:
 1. Sponsor Name
 2. Sponsor Grant/Contract Number
 3. UGA project identifiers – proposal, award, and project id
 4. If cost share obligations exist, whether those cost share obligations have been met; and
 5. Date of PI's last day of employment at UGA;
 6. Amount of unobligated funds;
 7. Requested date of award termination at UGA;
 8. Recommended Disposition
 9. Name/phone number of grants administrator at future institution.
 10. For any project recommended to be transferred to another institution, also include:
 - a. Institution where project will be transferred;
 - b. Names of students/faculty that could be affected by the transfer;
 - c. List any equipment requested to transfer to the new institution.
 11. Signatures of PI/Department Chair reflecting their agreement with this recommendation.
 - ii. When PI/school/college agree with this recommendation, the final and unit-approved letter should be routed to SPA for review and consideration.

- iii. SPA will assess each sponsored project and solicit required institutional approvals. If approval is not obtained, the PI will need to revise the plan accordingly.
- iv. SPA will update PI/unit on the disposition of their request.
- v. Based upon each sponsored project disposition, SPA will work with PI/unit to close/report each project financially and technically, as well as prepare/submit all sponsor required documents.
 - 1. PI/unit will work with UGA Asset Management related to requesting/obtaining approval for the transfer of equipment.
 - 2. PI/unit/SPA will notify active subrecipients of PI's impending move. All related UGA subrecipient agreements will be terminated and, if necessary, reissued by the new institution.
- vi. PI/unit will work with UGA's Innovation Gateway related to any technology developments.
- vii. PI/unit will ensure compliance with the [Compensation & Payroll Certification Policy](#) and [Compensation & Payroll Certification Job Aid](#) prior to PI's departure.
- viii. If there are questions, please contact SPA for clarification.
- ix. SPA/PI/unit will work with new institution providing all necessary information/documentation to effectuate the grant transfer to their new institution and ensure a smooth transition.

RESOURCES:

2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards



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Sponsored Projects Administration | 706-542-5939 | <http://spa.uga.edu>
