OSR-Chicago
Monthly Meeting

June 28, 2017
Agenda

• OSR Announcements
  • NCE procedure changes
  • NIH LRP
• COI Updates
• OSR Guidance on PI Departures and Adjunct Appointments
Effort Changes on NCE

New OSR procedures:
- Opening a new $0 Budget Period to extend the project end date
- Let OSR know updated effort for Key Personnel so that InfoEd is updated
NIH Loan Repayment

NIH LRP Programs:  [https://www.lrp.nih.gov/eligibility-programs](https://www.lrp.nih.gov/eligibility-programs)

Applications accepted: September 1 to November 15 8:00pm EST.

- Clinical Research:  [NOT-OD-17-077](#)
- Pediatric Research:  [NOT-OD-17-078](#)
- Health Disparities Research:  [NOT-OD-17-080](#)
- Contraception and Infertility Research:  [NOT-OD-17-079](#)
- Clinical Research for Individuals from Disadvantaged Backgrounds:  [NOT-OD-17-081](#)
NIH Loan Repayment

NIH LRP Programs: https://www.lrp.nih.gov/eligibility-programs

OSR Procedures: https://osr.northwestern.edu/policies/LRP

Step one:
- Applicant must submit the Northwestern Loan Repayment Program Certification Form during the application period (September 1 through November 15). The form must be completed, attested by the applicant, departmental administrator, department chair, and sent by email to lynda.wolter@northwestern.edu.
- Alternatively, paper forms can be hand delivered to:
  Executive Director, Office for Sponsored Research
  750 N. Lake Shore Drive, Rubloff Building 7th Floor, Chicago IL, 60611

Step two:
- Applicant is responsible for application submission via the LRP online site, National Institutes of Health Loan Repayment Program (LRP)
- Applicant should choose Lynda Wolter as Institutional Authorized Official using lynda.wolter@northwestern.edu as the email address. (Do not use the OSR-Chicago, general email address.)
OSR Guidance on PI Departures and Adjunct Appointments
Principal Investigator Departure

Events that are important for PI Departure procedures:
• Resignations
• Terminations/position elimination
• Leaves of Absences

Feinberg School of Medicine Faculty Departures procedures:
http://www.medicine.northwestern.edu/about/academic-affairs/departures.html

Office for Research Integrity Resource: Checkout Procedures for PI’s
https://sites.northwestern.edu/orintegrity/files/2017/01/Checkout_Procedures120815b-11h149y.pdf
Important Reminders

- Awards are made to Northwestern University, not directly to PIs
- Northwestern must agree to transfer awards if/when a PI moves to another institution
  - Exception for individual fellowships/career awards and certain institutional grants
- Awarding agency must also agree to the transfer
- Coordination between the PI, departmental staff, OSR and ASRSP is key
- Plan in advance – as soon as the plans are known – as there are circumstances when NIH may not transfer or significantly delay a transfer
Inventory of Current Awards

Create a master list of Current Awards and Subawards/subcontracts and determine the status with the PI for each Award and Subcontract

Most common options:
A. Transfer to new institution
B. Terminate project early
C. Transfer PI within Northwestern
D. Project remains at NU with Current PI
Procedures for PI Departures or Changes

• Meet with PI and review every open award/project
  • Will the project transfer to new institution?
  • Will project remain at NU with new PI or current PI?
    – If Current PI, work with Academic Affairs on appropriate appointment
  • Invite OSR GO if possible to this meeting if needed
• Document the plan with PI
• Notify OSR GO and ASRSP of plan
Procedures for PI Departures or Changes

Plan Implementation:

- PI prepare letters as needed to Award Agencies and route to OSR for institutional endorsements
- Notify OSR Subawards group of subawards that will transfer and new end dates
- PI should notify collaborating institutions that subawards will be amended and reissued from new institution
- PI needs to update IRB/IACUC protocols as appropriate
- Execute MOU’s (as needed) once Agency approves the plan
Transfer to New Institution

1. Review Awarding Agency policy regarding transfer applications
2. Contact the Awarding Agency for specific instructions
3. Provide the new institution contacts to OSR
4. Complete an ESPR for each award transferring
Transfer to New Institution

NIH Grant Policy Statement: 8.1.2.7 Change of Recipient Organization

1. Contact OSR GO
2. PI (with cc to OSR GO) or OSR GO notifies NIH GMO of the intent to transfer award
   A. Note that if requesting a transfer in the middle of a budget period or at the end of the Federal fiscal year, recipients should contact the awarding IC for IC-specific guidance on the timing and preparation of the change of institution application.
   B. Usually, equipment purchased for a grant that transfers will go with the grant.
   C. Other equipment, i.e. purchased on closed grants, must be negotiated between the P and Chair – and pay special attention to shared equipment. The title of all equipment is with the University.
3. OSR submits an electronic Relinquishing Statement via the Change of Institution link in eRA Commons. We must include a business official email for the new institution so that a notice is sent after NU submits.
4. Final FFR Expenditure Data and a Final Invention Statement are due to NIH from the relinquishing organization no later than 120 days after the end of NIH support of the project. Final FFR Expenditure Data should not be submitted until the original institution has received a revised NoA for the relinquished grant.
Terminate Project Early

- Notify Award Agency and seek instructions
- NIH: Notify the GMO who will provide closeout instructions
- Final FFR Expenditure Data and a Final Invention Statement are due to NIH from the relinquishing organization no later than 120 days after the end of NIH support of the project
Transfer PI within Northwestern

Any Change in PI will require **NIH Prior Approval** – this is generally true of all Award Agencies

**NIH Grants Policy: 8.1.2.6 Change in Status, Including Absence of PD/PI and Other Senior/Key Personnel Named in the NoA**

A. PD/PI withdraw from the project entirely
B. PD/PI be absent from the project during any continuous period of 3 months or more
C. PD/PI reduce time devoted to the project by 25 percent or more from the level that was approved
D. There is a change from a multiple PD/PI model to a single PD/PI model
   There is a change from a single PD/PI model to a multiple PD/PI model
E. There is a change in the number or makeup of the PD/PIs on a multiple PD/PI award
Project remains at NU with Current PI

Like transferring the PI, if the Project will remain at NU but the PI now will have a new appointment (e.g. Adjunct) or other status change, then NIH or Award Agency Prior Approval is required

Status changes may be:
• From Full time to Part time, e.g. Adjunct Appointment
• Reduced effort committed to the project
• Emeritus – less than full time
Faculty who hold a primary appointment at another institution or organization and remain based at that institution or organization but who contribute to the academic mission of the medical school will be appointed as adjunct faculty. This is a non-tenure track and generally an unpaid appointment. Any plans for NU compensation must be thoroughly reviewed for allowability and special permission of Chair and Faculty Affairs is needed. If their appointments are paid, they can have a maximum effort of 49%.
PI with Adjunct Appointment

If transferring to an Adjunct Appointment from a faculty or research faculty position, notification to the Award Agency of the change in status will be required as Adjunct appointments are less than full time and generally there will be obligations to the home institution, if there is one.

If a PI with an Adjunct appointment will remain PI on awards at NU, then a discussion and plan for the committed effort is required. A MOU with the new institution is then needed.
When an Adjunct Faculty is employed elsewhere, a Memorandum of Understanding is used to document the proposed activity. The form is available through OSR. In addition to the specific grant award’s title, sponsor and project period, the template form addresses the following:

1. Effort at Employer / Adjunct Effort at NU for the project (must equal 100%)
2. NU’s ownership of all project work
3. Signatures of NU Chair/Dean/OSR and Adjunct Faculty’s Employer

The fully-executed form must be returned to OSR and is included in the audit file.
PI Changes – Award Agency Prior Approval

Contact Award Agency for specific instructions

Generally, a letter by PD/PI and routed to OSR for institutional endorsement will be required. The same contents are generally required as for NIH Prior Approval
PI Changes - NIH Prior Approval

Letter by PD/PI and routed to OSR for institutional endorsement

Contents of letter:

• Request to change PD/PI or request approval for reduced effort
• Strong scientific justification related to the scientific project, including any proposed changes in scope,
• Biographical sketch of any new individuals proposed and other sources of support
• Budget changes resulting from the proposed change
• A new or revised Leadership Plan is required if the request is to change from a single PD/PI model to a multiple PD/PI model, or to change the number or makeup of the PD/PIs on a multiple PD/PI award
• The Commons ID must be provided for any new PD/PIs
Data Transfer in Event a Researcher Leaves

See: Research data: Ownership, Retention and Access Policy
http://research.northwestern.edu/sites/research/files/policies/Research_Data.pdf

Key points:
• University owns the “research data”
• PI’s are the stewards of the research data
• PIs are accountable for the stewardship of the research data
• Research data are to be accessible to members of the University community, external collaborators and others as appropriate
• Research data will normally be retained in the unit where they are produced.
  • See Policy on Retention of University Records for additional guidance
  • http://policies.northwestern.edu/docs/Retention_of_University_Records_030410.pdf
Data Transfer in Event a Researcher Leaves

See: Research data: Ownership, Retention and Access Policy
http://research.northwestern.edu/sites/research/files/policies/Research_Data.pdf

- Original data must be retained at Northwestern by the PI
- If PI leaves and project moved to new institution, ownership of the original data may be transferred upon PI’s request if:
  - Prior written approval of VPR
  - Written agreement from PI new institution that guarantees:
    - Its acceptance of ongoing custodial responsibilities for the data
    - NU having access to the original data should such access become necessary for any reason
    - Relevant confidentiality restrictions where appropriate

**Coordination is through OSR**
NU Financial Closeout

Coordination between PI, RA’s, OSR and ASRSP to meet agency requirements and deliverables

ASRSP Award Closeout Checklist:
http://www.northwestern.edu/asrsp/docs/closeout_checklist_current.xls

A PI Departure where the PI is taking the award to his/her new institution will trigger a full closeout
Closeout Workflow

- Dept. emails ASRSP GCFA’s
  - Note: ESPR form is not notification to ASRSP it is notification to OSR only, IRB, CCM etc. are not told either
- GCFA will help department begin to estimate costs and develop how much is being relinquished
  - ASRSP may begin processing a full workup of the financial reporting requirements at this time
- Depending on sponsor, some financial reports can be sent immediately for NIH see next slide
NIH Relinquishing Statement

- Form is filled out by department and reviewed by ASRSP to ensure the right amount is being relinquished
  - ASRSP creates a full FFR, reviews expenses etc. This takes time!
- Form is officially signed off by OSR
- NIH receives forms, process it, and eventually sends a revised NOA to NU
- NOA received and processed by OSR
- ASRSP at this time finalized FFR (requires another review of expenses), then submits Final Financial Report.
Questions??