Departing Principal Investigator with Sponsored Research
Standard Operating Procedure

1. Purpose

When a Principal Investigator (PI) departs from Weill Cornell Medicine (WCM), whether to join another institution or transition to the private sector, there are required steps to ensure proper management and closure of the PI's research portfolio in compliance with all applicable institutional policies, sponsor requirements, and federal regulations.

The exiting PI, in coordination with their Departmental Administrator (DA), is responsible for conducting a comprehensive review of all active and pending research activities, including grants, contracts, and reporting obligations. This review ensures that all necessary internal and sponsor-related actions – such as submission of final reports, transfer of award responsibilities, or completion of outstanding deliverables – are properly addressed prior to or promptly following the PI's departure.

2. Scope

This standard operating procedure (SOP) applies to PIs, Academic Departments, and the Office of Sponsored Research Administration (OSRA) in managing and supporting the departure of a PI from the institution. It defines the roles and responsibilities of PIs and their DAs in coordinating with OSRA to ensure proper transfer, continuation, or closeout of awards and sponsored research projects.

The specific actions required will vary depending on the PI's research portfolio and the Department's transition plans. PIs and DAs should consult with their assigned OSRA Specialists, who will coordinate with all relevant stakeholders to confirm and authorize the necessary steps for each sponsored research project.

OSRA policies do not govern financial reporting or transactions. Any matters related to financial management of awards must be addressed directly with the Department and the appropriate Grants and Contract Accounting (GCA) team within the Department of Finance.

3. Prerequisites

The prerequisite for this SOP is a PI with an active research portfolio. That portfolio may include applications pending review, active awards or contracts, and recently completed awards with outstanding closeout activities.

4. Definitions

Authorized Organizational Representative (AOR): The institutional official authorized to submit applications, certifications, assurances.

CDA – Confidential Disclosure Agreement.

CTL – Center for Technology Licensing.

DA – Department Administrator or departmental grants support staff.

DUA – Data Use Agreement.

eRA Commons – Electronic Research Administration system used by NIH and other U.S. Department of Health and Human Services agencies for grants administration.

GCA – Grants and Contract Accounting.

HRP – Human Research Protections.

IACUC – Institutional Animal Care and Use Committee.

IRB – Institutional Review Board.

ITS – Information Technologies & Services.

MTA – Material Transfer Agreement.

OSRA – Office of Sponsored Research Administration.

PI – Principal Investigator; for this SOP, a faculty member, instructor, fellow, or graduate student responsible for an active sponsored research award or contract, or a research application pending review.

WCM Leadership – The applicable Department Chair and Research Deans.

WIDRR – Weill Cornell Medicine Institutional Data Repository for Research.

5. Policy

All sponsored research projects are issued by sponsors to WCM. All communications to sponsors must be submitted in writing by OSRA, or by other parties with copy to the OSRA institutional listserv and must be approved by the Department Chair and Research Deans ("WCM Leadership").

When a faculty member serving as PI on a sponsored research project separates from WCM, a formal determination must be made regarding the disposition of each project. Sponsored projects may be relinquished, transferred to another institution, or retained at WCM under a new PI. The exiting PI must comply with all applicable WCM policies and sponsor requirements governing the termination, transfer, or continuation of sponsored research.

The Department Administrator (DA) must notify the assigned OSRA Specialists as soon as a PI's departure is confirmed, including the PI's anticipated last day at WCM. The OSRA Specialists will

provide the DA with a list of the PI's active awards/contracts and pending proposals, along with an Outgoing PI Project Tracker template (Appendix A). The DA is responsible for completing the tracker to document the proposed disposition of each award/contract and application as soon as possible.

Once plans are approved by WCM Leadership, the tracker will be used to coordinate and monitor all actions required to terminate, modify, or transfer an award/contract.

The OSRA Specialist will advise on sponsor-specific requirements for award or contract termination or transfer and ensure compliance with WCM policies. Award transfers and terminations typically require coordination among the PI, the sponsor's representative, the PI's Department, OSRA, GCA, and, when applicable, HRP, IACUC, and contracts and grants personnel at the PI's new institution.

The DA is responsible for confirming whether the exiting faculty member serves as key personnel on another PI's project and coordinating with relevant colleagues to determine whether sponsor notification is required. The DA must also verify whether the exiting faculty serves as a mentor on any active fellowship or career development awards and notify OSRA of any changes in mentorship so that the sponsor can be appropriately informed.

6. Roles and Responsibilities

Roles	Responsibilities
Exiting Principal Investigator (PI)	Review active and pending research with the DA; comply with approved project dispositions and sponsor requirements; complete required progress and technical reports; share sponsor transfer guidance with the Department and OSRA; coordinate protocol, data, materials, equipment, and intellectual property transitions.
Department Administrator (DA) / Department	Notify OSRA promptly of the departure and anticipated last day; complete and maintain the Outgoing PI Project Tracker; obtain Department Leadership approval; coordinate project actions, key-personnel and mentorship changes, subrecipient notifications, financial review with GCA, and required consultations with other WCM offices.
WCM Leadership (Department Chair and Research Deans)	Approve project disposition plans, outbound transfers, and sponsor communications. The Department Chair must ensure outstanding required reports are completed if the exiting PI does not submit them.
OSRA Specialists / Authorized Organizational Representative (AOR)	Provide the portfolio list and tracker; advise on sponsor requirements; coordinate institutional reviews and sponsor communications; prepare, submit, or countersign required requests; facilitate transfers, relinquishments, replacement-PI requests, amendments, terminations, and closeout actions.
OSRA Subawards Team	Coordinate subaward amendments to de-obligate unneeded funds and revise the period of performance, as appropriate.

Grants and Contract Accounting (GCA)	Work with the Department to review balances, commitments, payroll and effort charges, invoices, receivables, cost sharing, and unreconciled expenses; establish cutoff dates; support adjustments, financial reporting, relinquishment information, and financial closeout.

7. Grant Transfer Scenarios

When a PI with an active award plans to leave an organization, the organization may choose to terminate the grant, appoint a replacement PI, or transfer the grant to the PI's new organization.

Use Section 7.a for early termination, Section 7.b for appointment of a replacement PI at WCM, and Section 7.c for transfer to the PI's new organization. All actions must be carried out in collaboration with OSRA after WCM Leadership has approved the plans for each award.

7.a. Grant to Be Terminated Early

Sponsors (both federal and non-federal) must be notified in advance when a PI plans to depart WCM and the award will be terminated prior to the original end date. This notification is essential to ensure all required administrative steps are completed and to avoid legal issues, such as grant awards carrying binding obligations that must be fulfilled before the PI's official resignation.

In cases of early termination or PI Transfer, all required reports (e.g., financial, technical, property and patent) must be submitted to the sponsor. Departments should also consider whether early termination could negatively affect the sponsor's willingness—or contractual obligation—to issue final payment on any outstanding invoices.

Once the plan is approved by WCM Leadership, OSRA will work with the department to confirm the status of project deliverables and formally notify the sponsor of the early termination.

7.b. Grant to Remain at WCM with a Replacement PI

Sponsors (federal and non-federal) must be notified in advance of a PI's departure from WCM and the request to assign a new PI. At a minimum, this request must include a formal letter signed by the current PI and the proposed new PI and countersigned by OSRA.

Following approval by WCM Leadership, OSRA will coordinate with the department to prepare and submit the request to the sponsor.

All requests must be submitted at least 30 days before the PI's departure date.

- **NIH**: OSRA must submit the formal request letter through the Prior Approval module in eRA Commons. The request must include the proposed new PI's biosketch and current and pending (other) support documentation.

- **NSF**: OSRA must submit a formal request letter through Research.gov. The request must include the proposed new PI's biosketch and current and pending (other) support documentation.

- **DOD**: OSRA must submit a formal request letter to the DOD Grants Specialist. The letter must be signed by the current PI, the proposed new PI, and the AOR, and must include the proposed new PI's biosketch and current and pending (other) support documentation.

- **All other sponsors:** the award/contract terms must be reviewed to determine the given sponsor's process.

7.c. Grant to Be Transferred to the PI's New Organization

All outbound transfers must receive approval from WCM Leadership prior to initiating any formal action with the sponsor.

The National Institutes of Health and the National Science Foundation have established procedures for transferring active awards. For all other sponsors, departments must consult the sponsor directly to obtain applicable guidance.

If the PI has communicated with a grants manager at the sponsoring agency and received recommendations or additional instructions regarding the transfer process, this information must be shared with both the Department and OSRA.

For NIH grants, refer to the most recent Change of Recipient Organization Parent Announcement.

For NSF awards, refer to the most recent Proposal & Award Policies & Procedures Guide.

8. Funded Research Agreements

A complete inventory of all active funded agreements (e.g., sponsored research agreements, service agreements, research collaboration agreements, and similar funding arrangements) must be compiled and reviewed. Each agreement must be evaluated to determine the appropriate disposition, including whether the award will remain with the institution, be transferred (if permitted), be relinquished and reissued, amended, or terminated.

The terms and conditions of each agreement must be reviewed to identify any restrictions, obligations, or requirements related to transfer, reassignment of work, amendment, or termination. Particular attention should be given to sponsor approval requirements, change of principal investigator provisions, assignment restrictions, reporting requirements, intellectual property terms, data ownership and access provisions, and any other contractual or regulatory requirements that may be impacted by the proposed transition.

In parallel, all associated financial and compliance considerations must be assessed by the DA in conjunction with their assigned GCA accountant, including project balances, outstanding commitments, effort commitments, pending invoices, and other project-specific obligations.

OSRA, in collaboration with the Principal Investigator (PI), the Department, and applicable central offices, will coordinate the review of each funded agreement and facilitate any required sponsor

communications, award transfers, relinquishment actions, amendments, closeout activities, or terminations. All required institutional approvals, financial reconciliations, and supporting documentation must be completed prior to the execution of any transfer or closeout activities.

9. Non-Funded Research Agreements

A complete inventory of all active non-funded agreements (e.g., MTAs, DUAs, CDAs, and similar agreements) must be compiled and reviewed. Each agreement must be evaluated to determine the appropriate disposition, including whether it will remain with the institution, be transferred (if permitted under the agreement terms), amended, or terminated.

The terms and conditions of each agreement must be reviewed to identify any restrictions or requirements related to transfer, assignment, amendment, or termination. Particular attention should be given to assignment provisions, ownership and custody of materials or data, confidentiality obligations, notice requirements, and any requirements for sponsor, provider, or third-party consent.

Based on the scope and disposition plan for each agreement, consultation with other Weill Cornell Medicine (WCM) offices may be required, including but not limited to the Center for Technology Licensing (CTL), Information Technologies & Services (ITS), and other relevant administrative or compliance offices.

OSRA, in collaboration with the Principal Investigator (PI) and the Department, will coordinate and facilitate any required amendments, transfers, or terminations and will ensure that all necessary institutional reviews, approvals, and documentation are completed.

10. Monitoring the Process

Upon notification to OSRA of a PI departure, the Department Administrator will receive a list of the PI's active and pending sponsored research portfolio, as well as access to the Outgoing PI Project Tracker (Appendix A), which is used to identify and coordinate the tasks required for each project.

The DA will populate the tracker with the planned actions for each project. Once these plans are approved by WCM Leadership, the tracker will serve as the official reference document for all parties involved to monitor and manage the required steps for each project.

11. Award Management Considerations

- Any subawards issued under an award that the PI is transferring to a new institution must be terminated and closed prior to transfer. Subrecipients should be notified of the PI's departure as soon as possible to ensure timely termination.
- The exiting PI and their department are responsible for ensuring that all required progress and technical reports – on both active and expired awards under the exiting PI's direction – are submitted and approved by the Sponsor prior to the PI's departure and

prior to any award transfer. Submission of reports that were due while the award was administered by WCM remains the responsibility of the WCM department, even after the PI has left. If the exiting PI does not submit all required reports, the Department Chair shall ensure their completion by either preparing and submitting the reports or assigning this responsibility to a qualified individual within the department. Failure to submit required reports to a sponsor may result in adverse consequences for the institution, including potential loss of future funding.

- The PI and the Department Administrator(s) are advised to carefully monitor expenditures to avoid incurring unallowable costs under any circumstances. When a PI is no longer actively managing a project, continued charges may be subject to review by the Sponsor and/or auditors. Failure to properly notify the Sponsor of a PI change may result in financial consequences for the Department and the University.

12. Process Metrics

OSRA must be notified immediately upon the department's awareness of a PI's intent to leave the institution. Timely notification is required to facilitate an efficient and seamless transition process.

Award transfers often require significant lead time and may take longer than initially anticipated. Accordingly, transition planning should begin as early as possible once a PI's departure is known.

A sponsoring agency cannot approve the transfer of an active award to a different institution until the original institution has completed all required project closeout activities. Due to these sequential requirements, the full transfer process may take approximately 3–9 months to complete, depending on sponsor requirements and project complexity.

13. Special Considerations

Relinquishment of Pending Awards: Any pending proposals that may be selected for funding must be documented in the Outgoing PI Project Tracker and approved by WCM Leadership. WCM is responsible for submitting to the sponsor either a relinquishment statement or a letter confirming its agreement to relinquish such pending proposals. The receiving institution is responsible for initiating and preparing the transfer application in accordance with all applicable sponsor requirements and guidance.

Relinquishing Rights to Resubmission/Renewal Application: If a PI transfers to a new institution and the new institution will submit a resubmission or renewal of a proposal originally submitted by WCM, sponsors such as NIH may require documentation confirming WCM's relinquishment of rights to the subsequent submission. This is typically provided as a formal letter from OSRA, after approval is verified with Department leadership. Best practice is to include this letter in the resubmission or renewal cover letter; however, if it is not included at submission, the sponsor may request it during the initial application review stage.

Relinquishing Equipment: As part of the transfer process, any equipment purchased in whole or in part with grant funds must be reviewed and documented. The original institution is responsible for identifying such equipment in the transfer package, and the receiving institution must indicate whether it will accept and assume responsibility for the items.

Equipment included in the transfer is typically transferred along with the award when it is necessary for continuation of the research. This is coordinated through the formal relinquishment process at the original institution with the Budget and Planning Office.
NIH (and applicable sponsors) retains the authority to review and approve the disposition of grant-funded equipment to ensure appropriate use in support of the funded project.

All equipment transfers should be clearly listed and agreed upon by both institutions as part of the transfer application to support a smooth transition of the research program.

Awards with Subrecipients: Clear and timely communication with the subrecipient is essential to ensure proper termination of the subaward. The department must provide all necessary instructions and information regarding the termination process. If obligated funds remain on the subaward, the department must coordinate with the OSRA Subawards Team to amend the agreement. This amendment should de-obligate any unneeded funds and revise the period of performance as appropriate. If no funds are to be de-obligated, the department must obtain a final invoice from the subrecipient. Receipt and processing of the final invoice is required to formally close out and terminate the subaward. For this purpose, Department Administrators must communicate with their GCA accountant.

Exiting Mentor/Sponsor: If the exiting faculty member serves as a mentor or sponsor on any active fellowship or career development awards, the department must consult with OSRA to discuss whether a replacement mentor/sponsor is required or whether the individual will continue in that role from their new institution.

14. Coordination with Other WCM Offices

Departments and exiting faculty are responsible for coordinating directly with the appropriate WCM offices to ensure all applicable departure requirements are met. Certain departure activities are administered by these offices and fall outside OSRA's authority. The office-provided guidance below identifies initial steps for applicable activities; it is provided for reference only and does not supersede the policies or procedures of the responsible office.

Human Research Protections:

If the departing faculty member serves as key research personnel on any active human subjects research protocols, they must notify the Human Research Protections (HRP) office and, if applicable, any outside IRB service vendor well in advance of the departure.

For instances in which the exiting faculty member serves as the Principal Investigator on human subjects research protocols reviewed and approved by the WCM IRB, he/she/they must either:

- Transfer leadership to a new, appropriately qualified WCM Principal Investigator by submitting an amendment and updating any affected study documentation,
- Close the study by submitting a closure report to the WCM IRB, or

- Transfer oversight of the research to a new institution by submitting a new IRB application at the incoming institution and transferring data or materials through agreements.

The exiting faculty member must ensure data sharing, data use agreements, or material transfer agreements are established before moving any research records or biological samples to a different institution.

For instances in which the exiting investigator is listed as a study team member on one or more active human subjects research protocols, this person is responsible for notifying the Principal Investigator of their departure and a study team member must submit an amendment removing this person from the study team and updating any affected study documentation.

There may be circumstances when reliance may be appropriate for the transfer of an IRB protocol from one institution to another. Please contact the HRP office for more information.

Animal Research Management:

Principal Investigators with active IACUC protocols who intend to leave the institution, or their designated Department Administrator, are required to notify the IACUC Office promptly upon becoming aware of the planned departure. Additional information regarding the transition of active protocols can be found in the IACUC Guide for a PI Leaving WCM.

Finance-GCA:

The Department Administrator must coordinate with the assigned Grants and Contract Accounting (GCA) accountant to review each affected award's financial status and complete all required financial actions. This review should include available balances, outstanding commitments, payroll and effort charges, open purchase orders, subaward obligations, pending invoices, cost sharing, equipment, accounts receivable, and potentially unallowable or unreconciled expenses.

The Department and GCA should establish appropriate spending and payroll cutoff dates; process necessary cost transfers and adjustments; confirm that final invoices and financial reports are accurate and timely; and complete financial closeout requirements. For awards being transferred, GCA will support the financial reconciliation and preparation of relinquishment information, as applicable. Financial matters must be resolved in coordination with GCA before an award is transferred, terminated, or closed.

Center for Technology Licensing:

Any faculty member who intends to transfer, retain, or otherwise take intellectual property, software, research materials, data, or other university-related assets to a new institution must schedule an exit consultation with the Center for Technology Licensing (CTL) prior to their departure. During this consultation, CTL will review the nature and ownership of the intellectual property, data, software, and materials; assess any contractual, regulatory, sponsor, or institutional obligations; and provide guidance regarding the appropriate transfer, licensing, retention, or disposition of such assets. Faculty are responsible for ensuring that any transfer of materials, data, or intellectual property is approved and conducted in accordance with university policies, applicable agreements, and legal requirements.

Environmental Health & Safety:

Any faculty member with a laboratory that is closing or relocating must follow EHS's Laboratory Move and Closeout Procedure.

Samuel J. Wood Library:

Principal Investigators (PIs) and Department Administrator are responsible for ensuring compliance with Cornell Data Retention Policy 4.21, which requires the preservation and retention of research data. Prior to a PI's departure from the institution, and upon the completion or closure of any research project (funded or non-funded), all raw research data must be archived in the Weill Cornell Medicine Institutional Data Repository for Research (WIDRR) in accordance with institutional policy.

For exiting PIs, a WIDRR record must be created no later than 60 days prior to the PI's departure date. PIs and Departments should begin planning for data archival as early as possible to ensure sufficient time for data inventory, organization, and submission.

For research projects reaching completion or closeout, a WIDRR record must be created within 30–60 days following the project closure date.

In addition, for manuscripts, books, or other scholarly publications resulting from research conducted at WCM, a WIDRR record should be created within 30–60 days following the publication date.

PIs and Department Administrators should use the WCM Institutional Data Repository for Research (WIDRR) to document and archive research data and related metadata in accordance with applicable institutional, sponsor, regulatory, and record-retention requirements.

15. Related Documents

- Prior Approval Requests (OSRA0015)