



University of Nebraska-Lincoln PI Regulatory Off-boarding Checklist

This checklist is intended to be used as a guidance for off-boarding investigators and ensuring compliance with applicable regulations and policies.

The Office of Research and Economic Development's (ORED) offices and [policies and procedures](#) should be referenced when using this checklist.

Sponsored Projects

Do you wish to transfer awards?

Awards are made to the institution and not the faculty member. Your department and/or college must agree to the transfer of the award.

At UNL:

- At least 90 days prior to the planned transfer date, work with your department and Sponsored Programs (OSP) post-award specialist to determine if award(s) are eligible to transfer to another institution.
- If eligible, complete the [UNL Award Relinquishment Request Form](#) and submit to your OSP post-award specialist who will work with the sponsored programs contact at your new institution to facilitate the transfer. You will need to stop charging to the project for a period of time before the transfer can be initiated. The transfer process can take up to several months depending on the sponsor.
- If any portion of the award will remain at UNL, the department must name a replacement PI using the [Internal PI/Key Personnel Change Request Form](#). This may be subject to sponsor and applicable research regulatory body approval. If needed, UNL OSP will request that approval.
- UNL OSP will notify awarding agency of the change and obtain their instructions to process the transfer.
- Clarify with your department whether or not you (PI/researcher) will remain at UNL through an adjunct appointment.

At your new institution:

- Work with your new departmental and sponsored program contacts to prepare necessary documents for that institution to be ready to receive the transferred award.

Will materials or equipment be transferred?

At UNL:

- To transfer material, you may need to establish a Material Transfer Agreement (MTA). Notify NUtech Ventures that you plan on taking material(s) with you so that this agreement can be initiated as appropriate. (Outgoing MTA).
 - Materials that could require an MTA typically include cell lines, tissues, sera, DNA, transgenic animals, plasmids, vectors, etc. or other research materials such as compounds, sensors, and software etc.

- Work with your current department to complete an Equipment Transfer form, per [UNL Procurement policy](#).
 - Prior to transferring, you must ensure you notify Export Control staff if any of your equipment is export controlled.
 - Note that equipment purchased with Federal funds must receive approval from the federal sponsor prior to transfer of equipment. This approval can take up to 120 days. UNL OSP will initiate the correspondence requesting approval for transfer.

At your new institution:

- Work with your new department to properly record transferred equipment.

Will data (physical or electronic) be transferred?

At UNL:

- If you are sharing or transferring data, you may need to establish a Data Use or Data Transfer Agreement (DUA/DTA) between UNL and your new institution. A DUA/DTA will be needed if the receiving institution is taking on the data retention responsibility of a sponsored agreement or if the data is sensitive, identifiable, involves intellectual property, or has other restrictions (e.g. HIPAA data, export controlled data). Contact UNL OSP if a DUA/DTA is needed for these cases. If there are export control issues on this data or the data contains PHI (without the use of human subjects), a DUA/DTA may also be needed. Sponsored Programs will consult with appropriate offices when agreements involve this type of data in order to meet specific requirements for the transfer.

These agreements usually fall into two different categories:

1. Non-human subject data or completely de-identified human research participant data (as determined by UNL's IRB). Your current department will keep a copy of this data. Please work with your current department on how this will be accomplished and contact UNL OSP if a DUA/DTA is needed.
2. Human research participant data which could include Protected Health Information (PHI). This includes data which constitutes a Limited Data Set as defined by HIPAA. UNL IRB will notify Sponsored Programs awards team regarding agreements that involve this type of data and advise on specific requirements for the transfer.

- Work with your department to ensure original research records are maintained by UNL. PIs may take copies of research records, but the original data remain the property of UNL, in accordance with the UNL Research Data & Security requirements.

At your new institution:

- Work with your new department to properly safeguard research records.

Institutional Review Board (IRB)

Does your work involve human research participants?

- Compile a listing of all human subjects research protocols and identify how they will be managed or what level of engagement may continue. Once this list is compiled, contact the IRB directly (irb@unl.edu) to discuss appropriate steps for close-out or transfer.
- Notify your new institution's IRB or Ethics Committee and communicate regarding what type of human subjects research security/approvals they may require.
- Identify any protocols that may have required ClinicalTrials.gov registration and discuss this with the IRB accordingly regarding close-out or transfer of responsibility.

Institutional Animal Care Program (IACP/IACUC)

Does your work involve animal subjects?

- Compile a listing of all animal subject research protocols and ensure they are closed-out or transferred appropriately.
- Notify your new institution's IACP/IACUC and communicate regarding what type of facilities/security/approvals they may require.

Institutional Biosafety Committee

Do you have an active IBC protocol?

- Submit Annual Update forms for all active IBC protocols and indicate the work is no longer active if the work at UNL is terminating. If students and/or staff are remaining at UNL, contact the IBC at ibc@unl.edu to inquire about keeping the protocol(s) active.

Research Safety

Do you work with chemical, biological, radioactive or other hazardous materials?

- See the EHS SOP **Laboratory Decommissioning** for procedures to follow concerning shutting down your laboratory and properly disposing of hazardous chemicals.

Intellectual Property/Start-ups

- Compile a listing of any applicable patents/inventions/start-ups and contact NUtech Ventures to ensure continued development or completion of work is managed appropriately.

Conflicts of Interest/Commitment (COI/COC)

- If you have had a management plan while at UNL, be sure and alert your new institution and ensure you understand their disclosure requirements so that they can identify how your information may or may not transfer to their processes and procedures.

Export Control Compliance Program (ECCP)

Does your work involve export controls?

- Compile a listing of any applicable export controlled projects or activities (technology control plans/determinations) and contact the ECCP to ensure they are closed-out or transferred appropriately.
- If you were involved in an export controlled protocol that has an active technology control plan (TCP), you must complete the Termination Departure Statement. Contact Export Control staff to initiate this process.
- Ensure research project equipment, items, and information are accounted for, transferred, disposed of, and documented appropriately.

Human Resources (HR)

- Contact HR and ensure you understand what access you may or may not have to UNL systems upon your departure. Consider completing their employee offboarding checklists, which can be accessed on HR's above linked website.