



U.S. DEPARTMENT OF
ENERGY

Nuclear Energy

PI Move Guidance

October 2017

PI Move Request

Policy Drivers

- The CINR is a competitive funding opportunity announcement (FOA), which abides by financial assistance regulations.
- Financial assistance must have a competition between similar proposals for funding decisions to be made.
- DOE-NE awards cooperative agreements to non-Federal entities, not individuals. Applicants to the FOA are universities, not people.
- Universities, as the awardee, hold responsibility for the ultimate execution of the work.
- There are financial and regulatory drivers that require that the awarded institution completes the work.
- An award transfer from one institution to another is not allowable.

Policy Applicability

The PI move policy applies as follows:

- Changing the PI specified in an application (pre-award)
- Changing the PI specified in the award document (post-award)
- Adding or deleting a Co-PI – any change in a key person requires prior DOE approval
- Disengagement from the project for more than 3 months, or a 25% reduction in time devoted to the project by the approved PI
- Transfer of any part of the research or programmatic effort to another institution (or sub-awarding), unless already described in the application and in the approved award
 - ✓ *Not applicable for acquisition of supplies, materials, equipment, or general support services.*

NOTE: *Final approval is required for any of these requests by a DOE Contracting Officer.*

Options for Institutions of Higher Education

When a PI is exiting a University (University “A”) and moving to another (University “B”)...

Option 1: University “A” requests approval from DOE to assign a new PI at University “A”

- New lead PI takes over the R&D project. (If not approved by DOE, University “A” can submit another PI, or move to another option.)

Option 2: University “A” requests approval from DOE to assign a new PI at University “A”, assign exiting PI from University “A” moving to University “B” as a Co-PI and University “B” added as a sub-awardee to the award.

- Workscope and funding can be reassigned to University “B” through a sub-award.
- New lead PI at University “A” involvement can be negotiated between the original PI (now University “B”) and new PI (now University “A”)
- New lead PI (now University “A”), at a minimum, must submit quarterly progress updates about the project if technical scope is being managed and completed by the old lead PI (now University “B”).

Option 3: Cancel the award (pre-award) / terminate the award (post-award)

Alternate Option: Adjunct Faculty Position

- A PI (original at University “A”) may get approval from the institution to maintain an adjunct faculty position with the university. These typically last under 1 year so this option would only be available for projects that are close to completion.
- Rules for adjuncts vary widely by institution so please ensure that this is a viable option in your circumstance.

Assigning a New PI (University “A”)

- A formal, written request must be sent to the Contracting Specialist* for the award. The request should contain the following information:
 - Identify a new PI for University “A” and provide rationale/justification for the change.
 - If pursuing the sub-award request option, a description of the proposed sub-award to the new university (University “B”) including supporting documents (budget, budget justification, capabilities, etc.)
 - ✓ *Same information as required in the original FOA.*
 - A justification for why the project can still be successful.
- The request will be reviewed by the Contract Specialist, Contracting Officer, and Technical Project Officer to determine if the request has merit and remains within programmatic boundaries for DOE-NE.
- DOE will accept or reject the proposed plan. There is opportunity to rewrite the arrangement if it is not acceptable.

* Your Office of Sponsored Programs will have contact information for the Contract Specialist⁵

What Happens to Sub-Awards?

- Typically, no action happens with existing sub-awards
- Universities holding the prime award (University “A”) must submit a new budget for their newly added sub-awardee (University “B”), and new master budget for the award. (Sub-awardees will be approved in the same way a new PI is approved, as described in the previous slide.)
- If a Co-PI leaves a sub-award institution, prime award holders:
 - Have the sub-awardee remain in place asking sub-awardee to suggest a replacement Co-PI. DOE Contracting Officer approval is necessary.
 - ✓ *Submit new sub-award budget to Prime awardee, if necessary.*

NOTE: If the collaborator is from a national laboratory, the funds will stay with the national laboratory and a new Co-PI/collaborator will be assigned.

Summary

- Applications submitted to the CINR FOA are awarded to the applicant institution and cannot be transferred to another if a lead PI changes institutions.
- PIs or Co-PI's that are moving from one institution to another during and/or after the CINR review process are subject to the DOE's PI Move/Change Policy which is explained at www.NEUP.gov.
- Awards are made to the applying institution and will remain at that institution for the entirety of the project.
- Any additional changes to partners/collaborators need prior approval by the DOE Contracting Officer.