This guidance, procedures and process map are to be used by Drexel University Researchers when a faculty member is departing the Institution or undergoing a change in status, e.g., full-time to adjunct faculty, retired faculty, emeriti faculty. The numbered sections of the diagram are hyperlinked to below sections of the full ORI-003 guidance for direct link to the corresponding checklists.
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1. Overview

Purpose

This guidance outlines the procedures related to the departure of faculty members who are involved in research activities from Drexel University. In addition, the guidance applies to faculty members, mentoring faculty, and research professionals undergoing a change in status at the University, e.g., full-time to adjunct faculty, retired faculty, emeriti faculty, in concurrence with the Office of Research & Innovation (ORI) Standard Operating Procedure (SOP), ORI-002, Principal Investigator Eligibility and Responsibilities. The procedures will ensure notification of the appropriate central research offices and promote continuity in research activities.

Prior to faculty members leaving Drexel University, Department Heads/Departmental Associate Deans for Research (ADR) (or their designee) must ensure that appropriate offices have been notified at least 60 days in advance of departure, that all protocols, grants, and contracts are transferred or terminated, and that all materials, data, and equipment have been disposed of in accordance with university policy.

This guidance is limited to Drexel University’s Office of Research & Innovation (ORI) functional groups and does not preclude other Drexel University or Human Resources requirements for departing faculty. This document does not limit a school’s ability to create their own guidance to support the transition of research projects of departing faculty members.

2. Office of Sponsored Programs

If the departing faculty is involved in funded projects, either as Principal Investigator (PI), mentoring faculty, co-Investigator, or as key personnel or collaborator, notify the Office of Sponsored Programs (OSP) of the faculty member’s anticipated departure date and the affected projects, including pre- and post-award submissions, contracts and agreements.

The Department Head/ADR (or designee) will work with the central OSP grants and contracts administrators to close or transfer awards and agreements as applicable.

2.1 OSP Checklist

Email: Current OSP Grants Administrator with a cc: to DUResearch@drexel.edu

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<th>□</th>
<th>Provide OSP with the following information:</th>
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<tr>
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<td>• Active sponsored project(s) in which you are a PI, Co-PI, listed as key personnel or collaborator</td>
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<td>• Have committed (cost share) and/or actual effort on a sponsored project</td>
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<td>• Sponsored projects that include sub-awards</td>
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<td>• Pending proposals that are likely to be funded and/or agreements pending execution</td>
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<td></td>
<td>• Any active contractual agreements (Federal/State funded grants, cooperative agreements/contracts, subcontracts)</td>
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### Investigator Guidance – Departing Faculty Checklist

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<th>Document No.: ORI-003</th>
<th>Edition No.: 001</th>
<th>Effective Date: 11/01/2023</th>
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- **For active external awards, notify OSP which awards will be:**
  - Transferred to new institution
  - Relinquished prior to departure
  - Remain at the Institution under a new PI of record

- **Once OSP confirms which grants will be transferred to another institution, OSP will provide Research Accounting Services (RAS) with a list of projects to be transferred. The PI will work with the department administrator and RAS to complete all financial reports and financial transfers prior to departure.**

- **Provide OSP with information on any expected Date Use Agreements needed related to departure (incoming and outgoing)**

- **Complete and submit all required progress reports and final progress reports as required by the award terms and conditions**

- **Work with departmental personnel to ensure effort reports are completed prior to departure**

### 3. Export Control & Research Security

If the departing faculty has participated in any type of export-controlled or restricted research or project, the Export Control designee should be notified of their departure with appropriate plans for transferring data, equipment, materials, etc., as applicable. If it is unknown if the departing faculty member has participated in export-controlled or restricted research, please contact export@drexel.edu for verification.

The Export Control designee must confirm authorization to remove export-controlled materials prior to shipment from Drexel University to a foreign destination and receive copies of all export licenses or other authorizations.

#### 3.1 Export Control Checklist

**Email:** export@drexel.edu

- **If the departing faculty has participated in any type of export-controlled or restricted research or project, the Export Control designee should be notified of their departure. If it is unknown if the departing faculty member has participated in export-controlled or restricted research, please contact export@drexel.edu for verification.**

- **The departing faculty must work with the Export Control designee to determine what (if any) data may be transferred to a foreign country/entity. Export-controlled data may not be transferred out of the country without review and approval from the Export Control designee.**

- **If the departing faculty intends to transfer export-controlled equipment, materials, biologics, and/or data to another institution/entity, they must work with the Export Control designee to ensure that all documentation and requirements are met. The Export**
4. Applied Innovation
If the departing faculty holds Intellectual Property (IP), patents, copyrights, trademarks, licensing agreements under the purview of Drexel Applied Innovation (DAI), notify DAI of the faculty member’s anticipated departure date and the affected projects, licenses, agreements, etc.

4.1 DAI Checklist

<table>
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<tr>
<th>Email: <a href="mailto:applied_innovation@Drexel.edu">applied_innovation@Drexel.edu</a></th>
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5. Research Business Operations & Technology
If the departing faculty is included in the submission routing process of electronic systems, such as the department approver for COEUS records, contact the Research Business Operations & Technology (RBOT) office.

5.1 RBOT Checklist

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Note: If the departing faculty member is only listed as the PI and has appropriately closed all submissions and protocols or a new Drexel PI has been approved, notification to RBOT is not required.

6. Human Research Protection Program
If the departing faculty is involved in Human Subjects Research as a study PI, notify the Human Research Protection Program (HRPP) of the faculty member’s anticipated departure date and the affected studies.

Prior to the PI’s departure, with approval of the Department Head/ADR (or designee), the IRB protocols should be closed or appropriately transferred to a new Drexel PI or new Institution.

6.1 HRPP Checklist

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Provide the HRPP with protocol numbers of studies where the departing faculty member is the Principal Investigator

Submit a modification requesting closure of the study if all study activities have been completed

For studies that will be transferred to the PI’s new institution, a reliance agreement must be in place to cover IRB oversight of the study during the transition to the new institution

Consult with the HRPP for consultation if the Drexel IRB is providing IRB oversight for a multisite study, e.g., Drexel site will close but the Drexel IRB is the IRB of record for additional sites

Consult with the HRPP if you will be transferring specimens or any data from subjects. Please note that the IND/IDE and the Certificate of Confidentiality, if applicable, transfer with the protocol and the appropriate agencies (i.e., FDA, NIH) should be notified of the change in Institution

Update the status of any studies that are registered on ClinicalTrials.gov where the departing faculty is listed as PI, record owner, or otherwise named in the ClinicalTrials.gov posting, including the Contact/Location section of each record to reflect the new institution or closure of the study

For studies that will continue at Drexel, submit a Change of Principal Investigator Form, Form HRP-207, naming a new qualified Drexel PI and remove the departing PI from the study personnel

For faculty whose role is other than the PI, remove name from study personnel

### 7. Animal Care and Use

If the departing faculty is involved in Animal Care and Use research as a study PI, notify the Institutional Animal Care and Use Committee (IACUC) of the faculty member’s anticipated departure date and the affected studies.

Prior to the PI’s departure, with approval of the Department Head/ADR (or designee), the IACUC protocols should be closed or appropriately transferred to a new Drexel PI or new Institution.

Prior to the closure of a protocol, all animals must be transferred to another protocol, exported to another institution, or euthanized as per approved procedures within the protocol. Animal euthanasia must be conducted humanely and in accordance with the Drexel IACUC Euthanasia Policy.

#### 7.1 IACUC Checklist

Email: iacuc@drexel.edu
Provide IACUC with the protocol numbers for which the departing faculty member is the Principal Investigator and the expected final date for animal work

For each closing protocol, once animals are dispositioned, the IACUC Protocol Close Out Request Form must be completed and submitted

To export animals to another institution, complete the IACUC Animal Transfer Form and obtain approval from the University Laboratory Animal Resource (ULAR). The receiving institution must approve receipt of animals and coordinate shipment with ULAR. If animals are exported internationally, the PI must contact Export Control export@drexel.edu.

To transfer animals to another PI’s protocol within the Institution, the PI must initiate the process with ULAR by completing and submitting the ULAR Animal Transfer Internal Form

For studies that will continue at Drexel or protocols that need to remain open to accommodate animal shipment scheduled after the PI’s departure, submit an amendment naming a new qualified Drexel PI and remove the departing PI from the study personnel. The amendment to change the PI must be submitted and approved prior to the departure of the PI. Special attention must be given to the IACUC significant amendment submission calendar as this amendment needs to be reviewed by the full committee at a convened IACUC meeting

8. Institutional Biosafety Committee (IBC)

If the departing faculty’s research involves the use of biological hazards such as recombinant DNA, pathogenic organisms, human/primate samples, chemical carcinogens and cytotoxic agents under the purview of the Drexel University IBC, the IBC should be notified of the change in status of the research or the change in responsible personnel.

8.1 IBC Checklist

Provide IBC with the protocol numbers for which the departing faculty member is the PI and the expected final date for the research projects

For each closing protocol, once biohazard agents are dispositioned, the IBC Protocol Close Out Request Form must be completed and submitted to biosafety@drexel.edu

For studies that will continue at Drexel, submit an amendment naming a new qualified Drexel PI and remove the departing PI from the study personnel. The amendment to change the PI must be submitted and approved prior to the departure of the PI. Special attention must be given to the biosafety submission calendar as this amendment needs to be reviewed by the full committee at a convened IBC meeting
9. Environmental Health & Radiation Safety (EHRS)

If the departing faculty will be decommissioning or vacating laboratory space on campus, EHRS must be notified prior to vacating the space in order to minimize hazards to University employees and to maintain compliance with all applicable federal, state and local regulations. If the laboratory space is being transferred to a new PI, the new PI assumes responsibility of the laboratory space, including management of agents and hazards.

9.1 EHRS Checklist

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Email: ehrs@drexel.edu

- Notify EHRS thirty (30) days prior to vacating the space if decommissioning or relocating a laboratory due to the departure of the faculty member.

- Provide EHRS with a current chemical inventory with the notice of intent to vacate the space.

- EHRS will conduct a pre-inspection of the laboratory space with the PI and identify all chemical, physical, biological, and radiological hazards within the space to be managed prior to decommissioning the laboratory space.

- If the laboratory space is being transferred to a new PI, notify EHRS of the transfer of responsibilities and the date of transfer.

10. Responsibilities

10.1 Office for Research & Innovation Responsibilities

The ORI is responsible for maintaining this guidance document, applicable tools, training, granting exceptions, and monitoring. For inquiries regarding these procedures, please contact the Associate Vice Provost for Research Compliance and Regulatory Affairs, as part of the ORI.

The designated ORI Offices (OSP, DAI, HRPP, IACUC, etc.) are responsible for assisting, completing reviews, and providing guidance for departing faculty and Department Heads to promote continuity in research activities.

10.2 Departing Faculty Responsibilities

The departing faculty member is responsible for notifying their Department Head/ADR and appropriate ORI functional groups of their anticipated departure date and for coordinating appropriate project closures or transfers in collaboration with the Department Head/ADR (or designee). Notify applicable ORI offices at least 60 days prior to the departure of the faculty member.

10.2.1 Data Retention Requirements

The Drexel PI is the custodian of research data. These include paper files, digital data, and any items produced during the conduct of the research. The Drexel records
management policy, the data retention policy enforced by applicable funding agencies, and the data retention requirements as approved by the HRP or IACUC (if applicable) dictate how long data must be preserved. Please contact the HRP and IACUC offices to verify data retention requirements for specific protocols. Research data generated at Drexel may not leave the Institution without applicable agreements, e.g., DUA with the PI’s new Institution.

Minimum retention quick reference for human subjects research:

- Human research records, including signed and dated consent documents 3 years after completion of research
- If research has FDA oversight, 2 years following the date a marketing application is approved for the drug for the indication for which it is being investigated; or, if no application is to be filed or if the application is not approved for such indication, until 2 years after the investigation is discontinued and FDA is notified
- Signed and dated HIPAA authorizations and consent documents that include HIPAA authorizations 7 years after completion of research
- Research data involving minors 7 years after the minor reaches the age of 18.
- Research involving pregnant women 7 years after any child born to the research subject during the research reaches the age of 18

Minimum retention quick reference for animal use studies:

- IACUC records and reports that relate directly to proposed activities and proposed significant changes as approved by the IACUC must be retained at a minimum of 3 years after the completion of the activity.

10.3 Department Head/ADR (or designee) Responsibilities

The Department Head/ADR (or designee) should ensure that appropriate offices have been notified, that all protocols, grants, and contracts are transferred or terminated, and that all materials, data, and equipment have been disposed of in accordance with university policy, prior to faculty members leaving Drexel University. Notify applicable ORI offices at least 60 days prior to the departure of the faculty member. This checklist is provided to Department Heads to ensure an appropriate discussion is held on the relevant points for the protection of both the faculty member and the department.

11. Resources

- ORI-002 Principal Investigator Eligibility and Responsibilities
- Intellectual Property Policy
- HRP-070 Investigator Obligations
- HRP-207 Change in Principal Investigator
- IACUC/ULAR Animal Transfer Request Form
- IACUC/ULAR Animal Transfer Internal Form
- IBC Charter and Guidelines
- EH&S Lab Safety Manual
- EH&S Service Requests and Forms
12. Revision and Workgroup Members

12.1 Revision

Version 001/Effective Date 11/01/2023 - Original Document- Procedures and Guidance for Drexel University Research Community.

12.2 Workgroup Member

The Office for Research & Innovation appreciates the following individuals who served as Workgroup Members:

<table>
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<th>Work Group Members</th>
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<td>Executive Director of Human Research Protections Program Office of Research &amp; Innovation</td>
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<td>Director, Research Business Operations &amp; Technology Office of Research &amp; Innovation</td>
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