

## Checklist for Faculty Members and Other Principal Investigators Leaving the University

Faculty members and other Principal investigators leaving the University should consult with the relevant administrator(s) for their school and department to plan the relocation. If you need assistance in identifying these individuals Contact the [Office of Sponsored Programs](#).

### Archiving of Data

- All research records (including data) must be archived at the University in accordance with [Pitt Policy RI-14, Research Data Management](#). An inventory must also be included in the archived materials, allowing the content of the archive to be easily discerned. Optimally, the inventory will allow identification and retrieval of materials related to each published study.
- Investigators are permitted to take copies of the research records only if an agreement executed through the [Office of Sponsored Programs](#) is in place between Pitt and the new institution employing the investigator.
- If collaborators at the University may need access to research records in the future, they should be transferred to those collaborators, who will become the custodians of the records.
- An [archiving service](#) is available to secure electronic records for departing investigators to meet the University's data retention requirements, provided the archived records will not subsequently be needed by the investigators or their collaborators. If access to data will be needed in the future, investigators may take a copy (with an appropriate agreement), and collaborators at the University should also be provided a copy. Alternately, a responsible individual in a department or school may archive the electronic research records for a departing investigator.
- Many hard-copy records can be digitized using the [Perceptive Content / ImageNow service](#) managed through Pitt IT.
- Materials that cannot be converted to electronic format may be archived in repositories managed by the investigator's department. The University Library System also provides information about services for [archiving of research materials](#).

### Projects Under a Technology Control Plan (TCP) or those involving Controlled Unclassified Information (CUI)

If the departing individual's current research is covered under a TCP or involves CUI, the [Office of Research Security and Trade Compliance](#) must be contacted prior to departure to ensure compliance with all relevant compliance regulations and procedures prior to the transfer of items, technology, or data from the University of Pittsburgh or from the departing researcher to another University of Pittsburgh researcher.

## General Procedures for Closing Laboratories

- Develop an inventory of remaining chemical substances. Dispose of all unwanted chemicals through the Department of Environmental Health and Safety's (EH&S) Chemical Waste program at <http://ehs.pitt.edu> or (412) 624-9505. Prior to transferring any usable chemicals to internal colleagues, forward the comprehensive chemical inventory to EH&S for review. Highly toxic materials, peroxide forming chemicals, and chemicals which are on the [Department of Homeland Security's Chemicals of Interest list](#) should not be transferred.
- EH&S must be contacted for the disposal of chemicals before separating from the University. Once the faculty member has separated from the University, the respective department will be charged for chemical disposal costs.
- An online request for moving or relocating laboratory equipment must be submitted to [Surplus Property](#). Prior to relocation, equipment scheduled for delivery to Surplus Property or another laboratory must be cleaned and disinfected according to protocols listed in the [EH&S Safety Manual](#).
- Countertops, chemical fume hoods, and any other potentially contaminated surfaces in the vacated laboratory must be cleaned. All waste must be properly discarded. [EH&S](#) can provide further details about the required procedures.
- Biological safety cabinets must be decontaminated by a qualified vendor prior to being moved. Laboratory personnel are NOT permitted to perform or certify the decontamination of a biological safety cabinet (BSC) that is being moved. A qualified vendor must be contacted to conduct and document the decontamination process of the BSC prior to moving the BSC or closing the lab. Vendor documentation of decontamination will be requested by Surplus Property or other moving personnel prior to moving the BSC.
- A formal decommissioning plan must be developed with [EH&S](#) prior to vacating a BSL-3 laboratory.
- Remove regulators from all compressed gas cylinders, replace the protective cap, and ensure proper labeling of each cylinder. Contact the gas distributor to have the gas cylinders removed.

## DEA Controlled Substances

- DEA controlled substances must not be abandoned or left behind. The abandonment of DEA controlled substances is a violation of federal law.
- All DEA controlled substances must be properly disposed through a reverse distributor prior to separating from the University. EH&S must be contacted in advance to initiate disposal procedures. The quarterly controlled substance collection schedule is available at the EH&S web site (<http://www.ehs.pitt.edu>).
- While the transfer of DEA controlled substances from one licensed investigator to another is discouraged, it is permissible. The investigator wishing to transfer controlled substance(s) must have a currently active DEA license and must first contact the Pittsburgh DEA Field Office at 412-777-1870 to ensure that all required transfer documentation is obtained. The receiving investigator must also have a currently active DEA license that permits the storage and use of the particular controlled substances(s) being transferred.

## Radiation-Producing Devices and Materials

- If there are any radiation-labeled work areas (e.g. room, bench) or equipment (e.g. freezer, centrifuge, liquid scintillation counter, fume hood) the [Radiation Safety Office](#) must be contacted at (412) 624-2728 for final

survey and de-certification.

- If any radiation-emitting equipment (e.g., x-ray device) will be removed, relocated, or discarded, the [Radiation Safety Office](#) and the [Office of Research Security and Trade Compliance](#) must be notified.
- If any radioactive material is stored in the laboratory, the [Radiation Safety Office](#) must be contacted, to coordinate its removal, transfer, or disposal.
- If any departing personnel hold Access Cards to secured areas containing radiation-emitting devices (e.g., gamma irradiators, gamma knife), the [Radiation Safety Office](#) must be informed of the individual's departure. Access Cards cannot be transferred to another investigator; they must be returned to the [Radiation Safety Office](#) upon departure of the initially assigned holder.

### **Studies Using Recombinant DNA**

All protocols approved by the [Institutional Biosafety Committee](#) (IBC) for which the departing investigator is designated as the PI must be terminated, or an alternate PI should be designated via a protocol modification. Contact the IBC for further details about these procedures at (412) 383-1768 or [ibo@pitt.edu](mailto:ibo@pitt.edu).

### **Studies Approved by the Human Stem Cell Research Oversight Committee (hSCRO)**

All hSCRO-approved protocols, including protocols that do not require Committee approval, for which the departing investigator is designated the PI must be terminated, or an alternate PI should be designated via a protocol modification form. The [IBC](#) can be contacted at (412) 383-1768 to provide further details about these procedures.

### **Studies Using Animal Subjects**

All [Institutional Animal Care and Use Committee](#) (IACUC) protocols for which the departing investigator is designated the Principal Investigator (PI) must be terminated, or an alternate PI should be designated via a protocol modification form. The [IACUC Office](#) can be contacted at (412) 383-2008 or [iacuc@pitt.edu](mailto:iacuc@pitt.edu) to provide further details about these procedures.

- Prior to terminating [IACUC](#) protocols, all animals assigned to those protocols must be euthanized as specified in the protocol, transferred to another investigator's protocol, or exported to the institution to where the PI is relocating.
  - Animals can only be transferred if they have not, as yet, undergone manipulation, or the recipient protocol specifies the same manipulation procedures as the original protocol.
  - If the animal is a proprietary model, which the University purchased or received from a third party, check with the [Office of Sponsored Programs](#) to determine whether the University can transfer the animals to a third party.
  - To transfer animals to another Pitt PI's protocol, the PI must submit the transfer via the DLAR's [comprehensive animal management software](#) (CAMS).
  - To export rodents to another institution, the PI must submit an Animal Import/Export Request by downloading from <http://www.dlar.pitt.edu> the "Animal Import/Export and Third Party Project

Application” and submit it to [import@dlar.pitt.edu](mailto:import@dlar.pitt.edu) .

- If any departing personnel hold Access Cards to secure animal housing facilities, the [DLAR](#) must be informed of the individual’s departure. Access cards cannot be transferred to another investigator; they must be returned to the individual’s department administrator who is to discontinue access and destroy the ID badge.

### **Studies Using Human Subjects**

- PIs leaving the institution are responsible for notifying the Human Research Protection Office (HRPO) at [www.hrpo.pitt.edu](http://www.hrpo.pitt.edu) or (412) 383-1480 well in advance of their departure so that arrangements can be made to either close the study or name another appropriately qualified individual currently at the institution to serve as the PI.
- Tissue transfer must be carried out as described in the policy “[Management and Use of Human Biological Materials for Research Purposes](#)”.
- Research drug supplies should be disposed of as indicated by the sponsor of the study. If no such agreement exists, the investigator should contact the Investigational Drug Service at [pharm-IDS@upmc.edu](mailto:pharm-IDS@upmc.edu) for instructions on drug disposition.

### **Studies Conducted Under a University-based, Sponsor-Investigator Investigational New Drug (IND) or Investigational Device Exemption (IDE) Application**

If the departing investigator is currently the sponsor of an IND or IDE application, one of the following steps should occur:

- Withdrawal of the application if clinical studies being conducted under the application have been completed or will be terminated;
- Transfer of the application to another University investigator if clinical studies being conducted under the application will continue at the University and will not be opened at the new institution;
- Transfer of the application to the new institution if the clinical study will be opened there.

Contact [IIS@pitt.edu](mailto:IIS@pitt.edu) or 412-383-4311 for further details about these procedures.

### **Fiscal Matters**

Take action to complete all effort certification responsibilities. Please certify all effort statements currently available in ECC for yourself and all personnel working on your sponsored projects. If work has continued beyond the end date on your last certified effort statement(s), please work with your department administrator to complete the paperwork needed for a Proxy/Designee and to document your confirmation of effort expended through your final working day.

With respect to all fiscal matters, and research grant and contract matters arising from the departure of an investigator and the potential need to notify sponsors of a change in PI, the department research administrator should contact the [Office of Sponsored Programs](#) to complete necessary paperwork. The Office of Sponsored Programs will also assist with any needed Material Transfer Agreements (MTAs) or other agreements to transfer University research materials including research records and data. No University research materials including data may be taken to a new institution without an approved MTA or other agreement in place. Permission of

Chair or Institute Director is required for the relinquishment of any grants, or the transfer of any data, equipment or materials.

### **Intellectual Property and Rights in Data**

- For investigators with invention disclosures, patent applications in prosecution or those receiving proceeds from licensing of intellectual property, please contact the Innovation Institute at <http://www.innovation.pitt.edu/resources/> or (412) 383-7670 to provide contact information and a point of contact for the technology transfer office at the new institution.
- The University of Pittsburgh retains ownership of the research data generated by University faculty. Data access, retention and transfer is addressed in [Policy RI-14, Research Data Management](#)
- For information on transferring copies of data, contact the [Office of Sponsored Programs](#).

### **Studies Registered on ClinicalTrials.gov**

If the departing individual is the Sponsor or Investigator of a study registered in the University of Pittsburgh PRS account, the Sponsor, Responsible Party or Sponsor Organization may need to be changed. Send an e-mail to [ctgov@pitt.edu](mailto:ctgov@pitt.edu) well in advance of departure to discuss options and required changes.

## **Links**

### **Policies**

- [RI-10, Intellectual Property](#)
- [RI-14, Research Data Management](#)

### **Offices and Committees**

- Clinical Trial Registration: <https://www.ecshsr.pitt.edu/ct>
- Division of Laboratory Animal Resources: <http://www.dlar.pitt.edu>
- Environmental Health and Safety: <http://ehs.pitt.edu/>
- Human Research Protection Office: <http://www.hrpo.pitt.edu/>
- Human Stem Cell Oversight: <https://www.ibc.pitt.edu/human-stem-cell-research-oversight-hscro>
- Innovation Institute: <http://www.innovation.pitt.edu/resources/>
- Institutional Animal Care and Use Committee: <http://www.iacuc.pitt.edu/>
- Institutional Biosafety: <http://www.ibc.pitt.edu/>
- Investigator-Sponsored IND and IDE Support: <https://www.ecshsr.pitt.edu/ind-ide-support>
- Office of Sponsored Programs: <https://www.osp.pitt.edu/>
- Radiation Safety: <http://www.radsafe.pitt.edu/>
- Research Security and Trade Compliance: <https://www.tradecompliance.pitt.edu>

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