

University of Kentucky College of Medicine Sponsored Research Administrative Services	Identification M-SRAS 009 Version 1		Contact: SRAS Manager
	Standard Operating Procedure	Date Effective: 07/28/2014 Review Date: 07/28/2015	

No-Cost Extension Requests for Sponsored Project Grants

Purpose: The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Sponsored Research Administrative Services (SRAS) staff (may be Grant Proposal Specialist, GPS, or Grant Analyst, GA), with regard to requests for No-Cost Extensions (NCE) for sponsored project grants.

Introduction: Grants and contracts for sponsored projects represent a contractual obligation between the grantor and the University for the performance of a specific activity through which the grantor, or sponsor, is entitled to receive some consideration or benefits. The University assumes full legal responsibility for complying with all requirements imposed by the grantor or sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit.

Many sponsors will allow expenditure of unobligated project funds beyond the original competitive segment end date of the project. As no additional funds are requested beyond the amount awarded in the notice of award, this is termed a No-Cost Extension.

No-Cost Extension requests may be appropriate when:

- No term of award specifically prohibits the extension.
- No additional sponsor funds are required.
- The project's originally approved scope will not change.

Procedure:

1. The PI is encouraged to notify the SRAS GPS at least 60 days prior to the end date of the project for which they would like to request a No-Cost Extension. The GPS will work with the PI to facilitate the request if less notice is given, but depending on the sponsor requirements, the option to do so may be limited. If the chair/center director and DA were not included on an email request, the SRAS GPS will copy them on the email response to the PI, and will include them on all future communications as the request progresses.
2. SRAS staff confirms the identity of the sponsor and the current end date of the project.
3. SRAS staff checks the account balance and confirms there will be unobligated funds in the account at the current end date.
4. SRAS staff determines if there have been any previous No-Cost Extensions for this project by checking the OSPA database and available sponsor resources.
5. SRAS staff reviews notice of award and other sponsor information to confirm there are no restrictions that prevent a request for a No-Cost Extension. Notes in the OSPA database should

be reviewed. The sponsor's award guidelines and notices of grant award should be reviewed to determine sponsor specific parameters and/or requirements for requesting a No-Cost Extension. (Language like "an unobligated balance may be carried forward without sponsor approval" is common.) Note any sponsor deadlines for requesting a No-Cost Extension and assess if the deadline can be met.

6. The SRAS staff will request the following from the PI:

- A scientific/programmatic-related reason need for the extension.
- The length of time the extension is needed.
- Effort details for the PI and other key personnel during the no cost extension period.

Additional information will be requested from the PI depending on the specific sponsor requirements.

7. The SRAS staff will advise the PI of the need to request sponsor permission for any effort changes proposed during the no-cost extension period. (For example, NIH allows the PI and another other key personnel named in the notice of grant award to reduce his/her effort by up to 25% without obtaining prior approval.)
8. If there will not be sufficient funds to direct charge the anticipated PI or other key personnel effort, the continuing effort will have to be cost shared during the no-cost extension period. The SRAS staff will prepare a financial estimate of the cost share commitment required, and facilitate approvals of the PI's department chair/center director and the Sr. Associate Dean for Research, or other institutional approvals as may be required.
9. Most NIH funded projects have authority to extend the final budget period of a project one time for a period of up to 12 months beyond the original project end date. This can be completed electronically via the era Commons No-Cost Extension feature within a specified sponsor-defined time frame. This process requires the PI to provide the details requested in item 6. The SRAS staff should confirm that the "Extension" link appears in era Commons for the project. If so, the No-Cost Extension will not require additional approval from NIH. OSPA staff will need to process the extension via this link, after steps 1-8 of the SOP have been completed.
10. For most NIH projects, prior approval by NIH will be required for a second (or beyond) No-Cost Extension. This cannot be done via electronic submission in eRA Commons. A letter requesting the second No-Cost Extension must be sent to the NIH Grants Management Specialist. Once steps 1-8 of this SOP are completed, the PI must prepare and sign a letter of request that includes the grant number, grant title, current end date and proposed new end date, and an approximate unobligated balance. An explanation of why funds have not been spent and planned activities during the extension should also be included. The letter must be signed by the PI, forwarded to the SRAS staff for review, and then to OSPA for the institution's signing official's signature and submission to NIH.

ROLES AND RESPONSIBILITIES

Principal Investigator (PI) is responsible for:

1. Notifying SRAS staff and DA that he/she would like to request a No-Cost Extension.
2. Providing reason additional time is needed to complete project.
3. Determining how many additional months are needed for project completion.
4. Providing details of any change in effort for key personnel during the no-cost extension period.
5. Preparing letter and scientifically-related supporting documents for the request for a no-cost extension.

Sponsored Research Administrative Services (SRAS) Staff is responsible for:

1. Confirming the current end date of the project.
2. Checking the account balance and confirming there will be unobligated balance after the current end date.
3. Determining if this request is for a first request for no-cost extension or a second (or later) request.
4. Reviewing Notice of Award/Contract. Confirming there are no restrictions that prohibit a no-cost extension. Identifying sponsor's requirements for request and assuring these requirements are met.
5. Notifying OSPA Research Administrator of request for no-cost extension and supplying any required information and documents.
6. Reviewing and approving letter and any supporting documents.