



## Sponsored Project Administration

Procedure:	No-Cost Extension
Owner:	Sponsored Project Administration
Effective date:	03/01/2018
Last Updated:	02/08/2023

## Background

Most awards received in support of sponsored projects are eligible for a no-cost extension (NCE) of time to the final budget period for the purposes of completing the sponsored project as originally proposed and awarded by the sponsor.

Some no-cost extensions require sponsor prior approval; others like most federal grants can be approved by UVM with notification to the sponsor. Each award must be reviewed to ensure the terms and conditions related to no-cost extensions are followed.

## Purpose

This document sets forth procedures for requesting a no-cost extension of time to a sponsored project.

## Roles and Responsibilities

### Principal Investigator (PI) and Unit Administrator (UA)

- Determine if there is an appropriate reason to request an NCE.
- Review award document to determine method and timeline of request to sponsor.
- Confirm the availability of sufficient funds remaining for the no-cost extension period.
- Review any change of effort commitment for key personnel.
- Review applicable compliance requirements are up to date (IRB, IACUC, FCOI, etc.).
- Prepare no-cost extension request form and if applicable, sponsor request letter.
- Submit NCE request with applicable documents via an award mod request (AMR) in UVMClick.
- Submit separate UVMClick AMR request to SPA Financial Analyst if Re-budget for cost share is needed.

### SPA Research Administrator (RA), Award Acceptance Specialist, and Outgoing Subaward Specialist (OSA)

- RA to review no-cost extension request for compliance with sponsor requirements.
- RA to provide approval with notification to sponsor or submit signed letter to sponsor for approval, as applicable.
- RA to complete and Approve UVMClick Award Mod to update the UVMClick record with the new end date.
- Award Acceptance Specialist to complete PeopleSoft setup and send Notification email to PI and UA.
- Outgoing Subaward Specialist to issue subaward amendments, if applicable.

## Definitions

**No-Cost Extension (NCE):** A no-cost extension extends the project period beyond the original project end date allowing the original scope of work funded by the sponsor to be completed.

There are two common methods to request a no-cost extension:

- UVM exercises sponsor's expanded authority to extend end date, to which SPA provides notification to the sponsor.
- Sponsor approved no-cost extension via formal request.



**SPA:** Sponsored Project Administration

**RA:** Research Administrator

**PI:** Principal Investigator

**OSA:** Outgoing Sub-Award Specialist

**UA:** Unit Administrator (For the purpose of all procedures, Business Unit Administrator, Business Manager, Grant Administrator, Pre-Award, Post-Award and Department Administrator are all used interchangeably and refer to the person assisting the PI in the Department.)

## Procedure

### Reminders

#### Determining when NCE is needed

This is accomplished during routine budget reviews between PI and UA, recommended no later than 90 days prior to the end date. This is a review of the funds remaining and effort needed to complete the work. The UA would initiate the NCE and/or the reduction of effort award mod request. The UA would also initiate a re-budget award mod request if additional cost share were needed during the NCE.

#### Deadlines for NCE Requests

No-Cost Extension requests should be submitted to RA no later than 60 days prior to the award's current expiration date. This allows RA time to review the award and the NCE for compliance with sponsor requirements, submit to sponsor or provide approval with notification to sponsor, as applicable.

#### If federal deadlines are missed

No-Cost Extension request or notification deadlines are determined by the terms and conditions of the agreement and applicable sponsor policies. If an NCE notification deadline is missed, RA may not be able to exercise its ability to extend the grant, without additional sponsor approval. If an NCE request deadline is missed, the sponsor may require additional justification explaining the delay.

#### Level of Effort Confirmation

It is recognized that during the NCE period a reduced level of effort will be devoted to the project from the PI and other named key personnel. If the reduction of effort of each of these individuals during the NCE period will result in a reduction of their cumulative time devoted to the project by 25% or more, please identify the individual and explain the reduction of effort that is occurring in the NCE request. This reduction of effort may require prior approval from the sponsor before NCE can be processed. This is determined by sponsor guidelines and will be reviewed by RA.

Upon approval of the NCE, the adjusted time commitment will be updated in UVMClick and PeopleSoft according to the NCE justification.

### UVM Authorized NCE (typically a first NCE)

RA may extend the final budget period of most federal grants, one time, for up to (12) twelve months beyond the original expiration date, as long as:

- 1) Sufficient funds are available
- 2) There is no change in the project's originally approved scope or objectives that would otherwise require sponsor approval
- 3) At least one of the following applies:



- Additional time beyond the established expiration date is required to ensure adequate completion of the originally approved project.
- Continuity of grant support is required while a competing continuation application is under review.
- The extension is necessary to permit an orderly phase out of a project that will not receive continued support.

To initiate NCE, the PI or UA must submit a UVMClick AMR with a completed [NCE Request Form](#) and any other documentation required by sponsor.

The NCE AMR submitted thru UVMClick will be delivered to the SPA RA, who reviews and coordinates the NCE to completion.

Submission of the AMR constitutes PI confirmation of the information and approval to proceed.

Notes:

- The fact that unspent funds are anticipated to remain is not a sufficient justification for an extension.
- Awards that have little to no available balance will not be extended.
- SPA does not require Chairs and Deans to approve a PI's request for a NCE unless cost sharing is required.

## Federal Sponsor Requirements and Systems

### National Institutes of Health – eRA Commons

#### National Science Foundation – Research.gov

- PIs complete a [NCE Request Form](#) and generates a UVMClick Modification Request.
- NIH/NSF requests should be submitted to RA at least 60 days prior to the end date of the grant. RA will complete the NCE process using the sponsor's electronic system.

If this is a 2nd NCE request, the following must be included:

- Number of months needed and the new project end date.
- The amount of unobligated money still available.
- Three PDF documents that will be uploaded to sponsor system.
  - 1) Progress Report
  - 2) Budget & Budget Narrative (NIH Format)
  - 3) Extension Justification Narrative
- RA will complete the NCE process using sponsor system.

### NASA - Shared Service System

- PIs complete the [NCE Request Form](#) and generates a UVMClick Modification Request.
- RA will complete the NCE process using NASA's Shared Service No-Cost Extension Request System.

### USDA – NIFA (email)

- PIs complete the [NCE Request Form](#) and generates a UVMClick Modification Request.
- RA will complete the NCE process and notify NIFA Awards Management.

### Other Federal Sponsors:

- PIs complete a [NCE Request Form](#) and generates a UVMClick Modification Request.
- RA will coordinate and complete the NCE process following the Sponsor's requirements for submission.



## Sponsor Approved No-Cost Extensions

NCE requests should be submitted to Sponsor within 60 days prior to the end date of the award following the sponsor's requirements. Coordinate the NCE request with your [assigned SPA Research Administrator](#).

Some sponsors have an online award management system through which the NCE request is initiated by the PI.

If the sponsor requires a formal letter from the RA as part of the NCE prior approval request, the PI is responsible for completing the following information in the provided letter template:

- The amount of additional time required to complete the project.
- Scientific/Programmatic Justification for the need of additional time.
- The budget amount remaining.
- Explanation of how the remaining budget will be used during the extension period.

Most NCE requests are to be countersigned by a SPA RA/Authorized Official prior to being sent to the sponsor.

PI or UA should submit a UVMClick AMR with the [NCE Request Form](#) and NCE request letter if applicable. The SPA RA will review the AMR and submit request to sponsor as applicable.

SPA recognizes some sponsors do not have a formal process for requesting and approving a NCE. In these cases, SPA will accept reasonable and appropriate documentation from sponsor authorized personnel that acknowledges NCE.

Upon sponsor's approval or concurrence, SPA will extend the project's end date, including any subprojects as defined on NCE form, as appropriate following and follow the standard award process and check all compliance requirements prior to completing setup.

### Subawards

The OSA will coordinate with the UA and generate the no-cost extension amendment for the subrecipient's needing additional time as identified in NCE form.

## FAQs

N/A

## Helpful Links

SPA [No-Cost Extensions](#)

### Federal Sponsors:

[NSF – Research.gov](#)

[NIH – eRA Commons No-Cost Extensions](#)

[NASA – No-Cost Extension Request](#)

[USDA – Grant Management FAQs](#)

[Prior Approval Matrix \(2020\)](#)



## Document Change Record

Date	Version	Author	Change Details
03/01/2018	1	SPA	Initial release
10/30/2018	1.2	SPA	NCE Form Updated 10/16/18
01/08/2019	1.3	SPA	Hyperlink Update
04/06/2020	1.4	SPA	Updated with UVMClick Information
02/01/2023	1.5	SPA	Updated Process