Carrying Forward of Funds From One Year to Another and No-Cost Extensions on Sponsored Projects

Presented by
Linda Serrantonio & Joshua Tyack

The University of Vermont
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Agenda

• Welcome and introductions

• Carryforward on Sponsored Projects

• No-Cost Extension process

• Educational resources available
Purpose of the Presentation

• Overview of the process flow for both carryforward of an unobligated balance and No-Cost extension on a sponsored project.

  ➢ Understand when a carryforward request is appropriate and when prior approval is required.
  ➢ Understand when a No-Cost extension request is appropriate and when prior approval is required.
  ➢ Roles and responsibilities for each process.
**UVM Sponsored Project Life Cycle**

- **Apply**
  - Find opportunities
  - Application forms
  - Budget development
  - Proposal routing
  - Submission

- **Award**
  - Award receipt
  - Award acceptance
  - Set up notification
  - Subawards issuance

- **Manage**
  - Scope performed
  - Budget revisions
  - Budget projections
  - Project changes

- **Report**
  - Technical reports
  - Effort & cost sharing
  - Acct. payable (subs)

- **Close**
  - Budget closeout
  - Final project, and property reports
  - Patent report
UVM Research Community

- **300+** Active Principal Investigators (PIs)
- **100+** Departments with Sponsored Projects from **300+** Sponsors
- **$130M+** annual volume of awards on **700+/-** award actions
  - ✔️ 127 No-Cost Extensions processed to date in FY19
- **300+** subawards issued annually
- Office of Vice President for Research
- Many supporting departments
UVM Sponsored Project Administration Organization

Sonya Stern
Director, Sponsored Project Administration

Mercy Whittle
Compliance Analyst Senior

Sally Roberts
Operations & Office Support

Julie Macy
Team Lead
Proposal Submission & Award Administration

Emily Trantum
Team Lead
Award Acceptance, Set up & Outgoing Subawards

Linda Serrantonio
Team Lead
Research Finance & Reporting

Lana Metayer
Team Lead
Sponsored Revenue & Cash Management

Josh Tyack
Research Administrator Sr.

Deb Cannon
Research Administrator

Gretchen Argraves
Research Administrator

Bernie Caffrey
Set Up Specialist

Molly Epstein
Outgoing Subaward Specialist

Travis Morrison
Award Acceptance Officer

Kim Dutton
Financial Analyst Senior

Sue Lalumiere
Financial Analyst

Ken Viglucci
AR/BI Subject Matter Expert

Maggie Hall
Billing Analyst

Paul Sebastiano
AR Specialist

Jeri Anderson
Award Acceptance Officer

Tam Truong
Financial Analyst

Tiffany Stewart
Financial Analyst

Jennifer Purvee
Financial Analyst

Kathy McConnell
Financial Analyst

Updated 01/07/2019
What is a Carryforward (a.k.a. Carryover)?

- Carryforward is a process through which unobligated funds remaining at the end of the budget period may be carried forward to the next budget period. The carryforward of funds allows the Grantees to use the unused prior year funds in the current budget period.
What is an Unobligated Balance (UOB)?

- Unspent funds or budget remaining at the end of the budget or project period.
- UOB = Budget – Expenditures – Unliquidated/Pending Obligations.
- UOB is the official balance reported on the financial report or final invoice at the end of the budget year or project period by the SPA Financial Analyst.
Managing UOB Components

- Budget (What makes up the period budget)
  - Awarded funds per notice of grant award (NGA)
  - Automatic carryover or approved carryover from prior periods
  - Unliquidated obligations per prior year financial report
Managing UOB Components Cont.

- **Expenditures**
  - Allowable costs incurred in budget period and posted to the general ledger.

- **Unliquidated Obligations (only allowable for annual reports)**
  - Obligations incurred by the non-Federal entity for which an expenditure has not yet been recorded.
    - Subrecipient/consultant outstanding charges when invoice is received but not posted.
Example of an Official UOB per SF-425

<table>
<thead>
<tr>
<th>Federal Expenditures and Unobligated Balance:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>d. Total Federal funds authorized</td>
<td>644,215.43</td>
</tr>
<tr>
<td>e. Federal share of expenditures</td>
<td>591,987.19</td>
</tr>
<tr>
<td>f. Federal share of unliquidated obligations</td>
<td>28,952.86</td>
</tr>
<tr>
<td>g. Total Federal share (sum of lines e and f)</td>
<td>620,940.05</td>
</tr>
<tr>
<td>h. Unobligated balance of Federal funds (line d minus g)</td>
<td>23,275.38</td>
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</tbody>
</table>
When is Prior Approval Required?

- Treatment of UOB is determined by (in increasing order):
  - Uniform Guidance - 2 CFR 200.308
  - Agency policy and terms & conditions
  - Program requirements
  - Award terms & conditions
When is Prior Approval Required? Cont.

- May be available for spending without approval:
  - Automatic carryover mentioned (i.e. NIH SNAP)
  - UOB is not restricted

- Requires prior approval before available for spending:
  - Prior approval required (i.e NIH Non-SNAP)
  - UOB restricted
Example of Automatic Carryforward – Federal:

(See NIH Home Page at http://grants.nih.gov/grants/policy/awardconditions.htm for certain references cited above.)

Research and Development (R&D): All awards issued by the National Institutes of Health (NIH) meet the definition of "Research and Development" at 45 CFR Part 75.2. As such, auditees should identify NIH awards as part of the R&D cluster on the Schedule of Expenditures of Federal Awards (SEFA). The auditor should test NIH awards for compliance as instructed in Part V, Clusters of Programs. NIH recognizes that some awards may have another classification for purposes of indirect costs. The auditor is not required to report the disconnect (i.e., the award is classified as R&D for Federal Audit Requirement purposes but non-research for indirect cost rate purposes), unless the auditee is charging indirect costs at a rate other than the rate(s) specified in the award document(s).

An unobligated balance may be carried over into the next budget period without Grants Management Officer prior approval.

This grant is subject to Streamlined Noncompeting Award Procedures (SNAP).
Example of Automatic Carryforward – Federal Pass-through:

Attachment 4
Reporting and Prior Approval Terms

Subrecipient agrees to submit the following reports (PTE contacts are identified in Attachment 3A):

**Technical Reports:**

- Monthly technical/progress reports will be submitted to the PTE’s Administrative Contact within 15 days of the end of the month.
- Quarterly technical/progress reports will be submitted within 30 days after the end of each project quarter to the PTE’s Administrative Contact.

- Annual technical/progress reports will be submitted within 60 days prior to the end of each budget period to the PTE’s Principal Investigator. Such report shall also include a detailed budget for the next Budget Period, updated other support for key personnel, certification of appropriate education in the conduct of human subject research of any new key personnel, and annual IRB or IACUC approval, if applicable.

- A Final technical/progress report will be submitted to the PTE’s Principal Investigator within 60 days of the end of the Project Period or after termination of this award, whichever comes first.

- Technical/progress reports on the project as may be required by PTE’s Administrative Contact in order for the PTE to satisfy its reporting obligations to the Federal Awarding Agency.

**Prior Approvals:**

- Carryover: Carryover is automatic

**Other Reports:**
Example No Automatic Carryforward – NIH:

Research and Development (R&D): All awards issued by the National Institutes of Health (NIH) meet the definition of “Research and Development” at 45 CFR Part § 75.2. As such, auditees should identify NIH awards as part of the R&D cluster on the Schedule of Expenditures of Federal Awards (SEFA). The auditor should test NIH awards for compliance as instructed in Part V, Clusters of Programs. NIH recognizes that some awards may have another classification for purposes of indirect costs. The auditor is not required to report the disconnect (i.e., the award is classified as R&D for Federal Audit Requirement purposes but non-research for indirect cost rate purposes), unless the auditee is charging indirect costs at a rate other than the rate(s) specified in the award document(s).

Carry over of an unbudgeted balance into the next budget period requires Grants Management Officer prior approval.

This award is subject to the requirements of 2 CFR Part 25 for institutions to receive a Dun & Bradstreet Universal Numbering System (DUNS) number and maintain an active registration in the System for Award Management (SAM). Should a consortium/subaward be issued under this award, a DUNS requirement must be included. See http://grants.nih.gov/grants/policy/awardconditions.htm for the full NIH award term implementing this requirement and other additional information.
Example No Automatic Carryforward – Federal Pass-through:

**Special terms and conditions:**

1. **Copyrights**
   Subrecipient ___ grants / _X_ shall grant (check one) to Pass-through Entity an irrevocable, royalty-free, non-transferable, non-exclusive right and license to use, reproduce, make derivative works, display, and perform publicly any copyrights or copyrighted material (including any computer software and its documentation and/or databases) first developed and delivered under this Subaward Agreement solely for the purpose of and only to the extent required to meet Pass-through Entity’s obligations to the Federal Government under its Prime Award.

2. **Data Rights**
   Subrecipient grants to Pass-through Entity the right to use data created in the performance of this Subaward Agreement solely for the purpose of and only to the extent required to meet Pass-through Entity’s obligations to the Federal Government under its Prime Award.

3. **Automatic Carry Forward:**  
   [ ] Yes  
   [X] No
   *(If No, Carry Forward requests must be sent to Pass-through Entity’s Administrative contact, as shown in Attachment 3)*
When Carryforward is Automatic:

- No need to submit carryforward request to sponsor.
- UOB is available in full.
- Note – for NIH, if the balance is greater than 25% of the budget, a justification should be included in the RPPR submitted by the PI or justification will be required.
When Carryforward is not Automatic:

- Prior approval request must be approved by the sponsor before UOB is available in the next budget period.

- Once approved, a rebudget will be completed in PeopleSoft to move the budget to the new chartstring.
Roles & Responsibilities when Prior Approval is Required:

- Principal Investigator (PI) and/or Unit Administrator (UA):
  - Confirms amount of UOB from the expired budget period with SPA FA.
  - Prepares carryover request being submitted to the sponsor.
  - Submits carryforward request and all supporting documentation to SPA FA.
  - Communicates carryforward status as appropriate with UA and SPA FA for follow up action.
Roles & Responsibilities when Prior Approval is Required:

- SPA Financial Analyst (FA):
  - Completes financial report to determine UOB available.
  - Works with the PI/UA as appropriate to prepare carryforward request letter.
  - Submits carryforward request to sponsor as outlined in award guidelines.
Roles & Responsibilities when Prior Approval is Required:

- SPA Financial Analyst (FA):
  - Receives sponsor decision and communicates carryforward status as appropriate with PI/UA.
  - Processes approved carryforward change in PeopleSoft.
Carryforward Request:

- PI creates a formal letter addressed to the sponsor’s grant officer with the following information:
  - PI Name
  - Grant number
  - Carryover dates or years (from/to)
  - Amount of UOB to be carried over (broken out between direct and indirect (F&A))
Carryforward Request Cont.

- Reason for the UOB
- Reason the carryforward funds are needed to accomplish the grant work and why the grant work could not be accomplished by rebudgeting current period funds.

- Sample Carryforward Request template letter to sponsor
Sample Carryforward Request Letter

DATE

[Sponsor/Contact]

Re: Carryover Request for Grant [Grant number]
   Sponsor Name: [Sponsor]
   PI: Dr. [PI name]

Dear [Sponsor Contact],

We are writing to formally request your approval for carryover of an unobligated balance of [$ amount] total cost for project [($ direct cost; $ F&A costs)] for [Grant Number], entitled ["Grant Title"] from budget year [#] to budget year [#].

The unobligated balance exists due to [explain why there is a balance]. This carryover is essential for the successful completion of the project. Use of the unobligated balance will ensure our ability to fulfill the specific aims of the project... [provide specifics of how will carryover be utilized, why is it necessary].

Attached please find a detailed carryover budget, budget justification, checklist (if NIH) and a copy of the Federal Financial Report (if NIH) for your review.

Should you have any questions or concerns regarding this request, please contact Sponsored Project Administration at spa@uvm.edu or the PI at [email].

We look forward to your reply.

Sincerely,

[PI Name & Contact Information]

I concur,

[SPA Name & Contact Information]
Attachments Required with Carryforward Request:

- Detailed total budget for UOB being requested.
  - Includes direct costs plus indirect costs using the F&A rate in effect for the current budget period.
    - For NIH use the 2590 detailed budget forms and the checklist page reflecting the requested F&A rate and F&A amount.
  - Budgetary and scientific justifications.
Carryforward Request Submittal:

- SPA will review, verify and sign as the authorized business official.
- SPA FA will submit request to the sponsor, along with a copy of the grant’s latest financial report, as appropriate.
  - If the financial report has not been completed, SPA FA will need to confirm the UOB prior to submitting the request.
Carryforward Request Completion:

- Once approval is received by the sponsor, SPA FA will work with the UA to rebudget the funds in PeopleSoft from the old budget period into the current budget period.
  - The funds are now available for spending per the approved budget included in the carryover request.
What is a No-Cost Extension (NCE)?

- An action that extends the project period beyond the original project end date with no additional funding allowing the original scope of work funded by the sponsor to be completed.

  ✓ Only to be used at the end of an award period, not when we expect additional funding increments.
When is an NCE Appropriate

- When additional time is needed to:
  - Allow the original scope of work funded by the sponsor to be completed.
  - Allow continuity of grant while waiting on competitive renewal; or
  - Allow for the orderly phase out of a project that will not receive continued support.
When is an NCE not Appropriate

- Unspent funds remain on the award.
- Award has little to no available balance remaining.
- Extension should be tied to a programmatic justification.
NCE Requirements

- SPA will need the following information:
  - Sponsor approval or sponsor notification.
  - Completed NCE request form sent to SPA Research Administrator.
- NCEs always require sponsor approval *unless* award waives that requirement.
NCE Request Form

University of Vermont
Sponsored Project Administration
No Cost Extension Request

To: Sponsored Project Administration (SPA)
From: Principal Investigator (PI)
Date: (Click here to enter a date.)
Re: No Cost Extension Request

This is to request that a no-cost extension be granted for the following project:

- **InfoEd Number**: (Click here to enter text.)
- **Project Title**: (Click here to enter text.)
- **Sponsor Name**: (Click here to enter text.)
- **Current End Date**: (Click here to enter a date.) (maximum is 12 months from current end date)
- **New End Date**: (Click here to enter a date.)

We are requesting the no-cost extension for the following reasons (check all that apply):

- 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
- Other (please describe): (Click here to enter text.)

During this no-cost extension, the project's originally proposed scope of work will:

- Not Change
- Change (If checked prior approval from the sponsor is required. Please contact your SPA Research Admin.)
NCE Request Form Cont.

Effort for PI and all key personnel named in the grant award will:

- Continue at the same level as the current funding period from the same funding source. If different funding source identify new chartstring: Click here to enter text.
- Be reduced as follows
  (If the reduction of effort for PI or named key personnel during the NCE period will result in a reduction of their cumulative time devoted to the project by 25% or more, please identify and explain the reduction of effort this may require prior approval from the sponsor before NCE can be processed.)

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<th>Revised Effort</th>
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<td>Click here to enter text.</td>
<td>Click here to enter text.</td>
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<td>Click here to enter text.</td>
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Budget balance:

- We have verified there is a sufficient budget balance in my project to cover this effort.
- There is not a sufficient budget balance in my project to cover this effort. It will be cost shared with the following chartstring: Click here to enter text.

If Cost share is required approval signature of covering unit is required

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<th>Approval</th>
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<tbody>
<tr>
<td>Name: __________________ Signature: __________________ Date ____________</td>
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* Sponsor prior approval may be required for effort reductions. Please contact your SPA Research Administrator for assistance.

Subcontracts:

- Please extend the following subcontracts:
Completing NCE Request Form

- List all key personnel effort changes.

- If cost share effort will be changing, include the following on the form:
  - New cost share chartstring.
  - Budget amounts for each chartstring.
  - Signature of unit covering cost share.
Completing NCE Request Form Cont.

- If insufficient budget balance remains to cover project expenses, include the following on the form:
  - Cost share chartstrings, including budget categories.
  - Budget amounts for each chartstring.
  - Signature of unit covering cost share.

- Note: Anytime cost share (or salary cap) will continue during the NCE period, chartstrings and new budget amounts should be included on the NCE form.
UVM-authorized NCE

- Most federal sponsors waive the requirement to approve first time NCEs.
- For sponsors like NIH, NIFA, NSF, and NASA, UVM can exercise a one time NCE of up to 12 months.
- SPA RA will exercise this extension using the required system of each sponsor with receipt of a complete NCE form and sufficient justification.
Examples: UVM-authorized NCE

- USDA-NIFA agreement language:

No-cost Extension of Time
If a no-cost extension of time is approved in accordance with 2 CFR 200.308(d)(2), recipients must notify NIFA that they are exercising their authority to extend without funds the completion date of an award. Notifications must be submitted as a pdf attachment to an email sent to awards@nifa.usda.gov.
Examples: UVM-authorized NCE

NIH agreement language:

8.1.1.3 Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds

The recipient may extend the final budget period of the previously approved project period one time for a period of up to 12 months beyond the original completion date shown in the NoA if:

- no term of award specifically prohibits the extension,
- no additional funds are required to be obligated by the NIH awarding IC, and
- the project’s originally approved scope will not change.

Such an action affirms that additional work remains to be completed on the project and that resources are available to continue to support the project, or that additional time is needed to provide for an orderly closeout. The fact that funds remain at the completion date of the grant is not, in itself, sufficient justification for an extension without additional funds.
Deadlines for NCEs that Require UVM Approval

- Departments should send an NCE Request Form to SPA RA at least 30 days prior to award end date.

- NSF requires notifications be sent at least 30 days prior to end date, please allow for extra time for NCE requests on NSF funded projects.
Effort Changes on NCEs Requiring UVM Approval

- PI and/or UA should complete the effort change portion of the NCE Request Form.
  - NIH does not require prior approval for changes in effort to named key personnel during NCE period absent a change in scope.
  - Other federal sponsors have unclear guidelines, work with SPA RA to submit prior approval requests as needed.
NCEs that Require Sponsor Approval

- We must receive approval for NCEs on all subawards, non-federal sponsors, and some federal sponsors, for example USDA-NRCS and USGS.
- We must receive approval for a second NCE for any award where we have already exercised a UVM approved NCE.
- Requirements to extend award end dates are found in the award document.
- NCE request form should be Sent to SPA at least 45 days prior to award end date.
Example: Sponsor Requirements

e. No-Cost Extensions of Time.—When a no-cost extension of time is required, the recipient must submit a written request to the NRCS administrative contact no later than 30 calendar days before the expiration date of the award. The request must contain the following:

- The length of additional time required to complete the project and a justification for the extension
- A summary of progress to date
- An estimate of funds expected to remain unobligated on the scheduled expiration date
- A projected timetable to complete the portions of the project for which the extension is being requested
- Signature of the grantee and the project director
- A status of cost sharing to date (if applicable)

Note: An extension will not exceed 12 months. Requests for no-cost extensions received after the expiration of the award will not be granted.
Request Letter for NCE

- In most cases when sponsor requires a request from SPA, PI must send SPA RA a letter that includes the following:
  - The amount of additional time required to complete the project.
  - Scientific/Programmatic Justification for the need of additional time.
  - A budget with the amount remaining on the project.
  - How the remaining budget will be used during the extension period.
  - Any effort changes that would require prior approval.
  - Any additional requirements the sponsor has outlined in the award document.
Request Letter for NCE Cont.

- SPA RA will review and work with the PI/UA on any changes required.
- Most NCE requests will be signed by the SPA RA and PI prior to being sent to the sponsor.
- Letter should come from UVM as an institution and be addressed to the sponsor’s grant management or administrative contact.
Sample Request Letter for NCE

[Date]

[Sponsor Address]

Re: No-Cost Extension Request to Award [Number]
Sponsor Name: [Sponsor]
    InfoEd [Number]
    PI: [PI name]

Dear [Sponsor Contact],

We would like to request the above subject award be extended to [requested end date]. The no-cost extension will allow us to [Provide a clear justification statement, summary of progress to date].

The current estimate of funds remaining of [amount] will be used to support the activities [or provide some additional details] being conducted during the extension period.

[If the commitment for any key person named in the award is being reduced from what was originally budgeted, indicate the new commitment during the extension period and the reason for the reduction.]

Thank you for considering this request. You may notify us of your decision or if you have any questions by sending an email to Sponsored Project Administration at spa@uvm.edu.

We look forward to your reply.

Sincerely,

[PI Name & Contact Information]  UVM Signing Official,  [SPA Name & Contact Information]
Sponsor Approval of NCE

- Most sponsors will issue UVM an amendment to authorize an NCE.
  - SPA will accept reasonable and appropriate documentation from sponsor personnel that acknowledges NCE depending on language in award document.
Subawards During NCE

- The PI/UA should identify any subawards that should be extended on the NCE Request Form.
  - Subawards that are not identified will not be extended.
- Outgoing subaward specialist will coordinate with the UA and generate the no-cost extension amendment for those subrecipients needing additional time.
Completing NCE Set-Up in PeopleSoft

Once the SPA RA has received appropriate sponsor approval and a complete and accurate NCE Request Form, SPA will complete the process in PeopleSoft.

- It is important that approval (by signature) for all new cost share chartstrings has been provided in the NCE request form to expedite this process.
Q: How do I figure out the unobligated balance of my award?

A: The unobligated balance (UOB) = Budget - Expenditures - unliquidated obligations.
   
   - Contact your SPA FA if you need assistance determining this amount.
Carryforward FAQ

Q: When carryforward is automatic, does the sponsor need to be contacted?

A: No, the UOB is available in full and can be rebudgeted into the next budget period by working with your SPA FA.

- Note – for NIH, if the balance is greater than 25% of the budget, justification must be provided in the RPPR.
Q: I have leftover money from my agreement, can I have a NCE?

A: Yes, so long as you need extra time to complete the approved scope of work, to receive renewal funding, or for an orderly close out of an award.

- An NCE is not appropriate just for the sole purpose of spending down the grant.
Q: My sponsor told me my NCE is approved, do you need anything else?

A: If the agreement specifies we need sponsor approval in writing, then an email from an authorized individual is all we need. But most awards will require our sponsor to issue UVM an amendment.
Resources for Answering Questions

• Sponsor Guidelines

• SPA Carryforward of Unobligated Balances Procedure: https://www.uvm.edu/uvmweb/sponsored_programs/spa-procedures

• SPA No-Cost Extension Procedure: https://www.uvm.edu/uvmweb/sponsored_programs/spa-procedures

• Uniform Guidance Budget Revisions: 2 CFR 200.308

• NIH No-Cost Extension: https://www.niams.nih.gov/grants-funding/post-award-grants-administration/no-cost-extensions-final-budget-period

• NIH: Changes in Project and Budget
The National Council of University Research Administrators (NCURA) strives to make advances in the field of research administration through professional development, the sharing of knowledge, and by fostering a sense of community via multiple venues:

https://onlinelearning.ncura.edu/ Tutorials, on-line publications, magazine, industry news are available to NCURA members

http://www.ncura.edu/travelingworkshops/Home.aspx These workshops are taught by experienced leaders in the areas of compliance, department research administration, global research management, post-award administration and pre-award administration; the expertise depends on the workshop.

https://onlinelearning.ncura.edu/free-resources Education available to the public at No-Cost, NCURA membership is not required
Research Administrators Certification Council (RACC) is an independent non-profit organization composed of active certified research administrators whose role is to certify that an individual, through experience and testing, has the fundamental knowledge necessary to be a professional research or sponsored programs administrator.

http://www.cra-cert.org/
Federal Demonstration Partnership (FDP) is a cooperative initiative among 10 federal agencies and 154 institutional recipients of federal funds and is a program convened by the Government-University-Industry Research Roundtable of the National Academies. Its purpose is to reduce the administrative burdens associated with research grants and contracts. Many institutions utilize FDP’s templates, including one for outgoing subawards [http://thefdp.org/default/subaward-forms/](http://thefdp.org/default/subaward-forms/).

National Institute of Health publishes YouTube videos which cover all sorts of information relevant to NIH grants [https://www.youtube.com/user/nihgrants](https://www.youtube.com/user/nihgrants).
Some universities have developed educational videos on various aspects of sponsored research administration, which they make accessible to the public. Vanderbilt University offers a “Getting Started in Sponsored Research” series of webinars at No-Cost. [http://www.vanderbiltlinkages.org/gssr-1/]