Sponsored Project Administration

Procedure: No-Cost Extension
Owner: Sponsored Project Administration
Effective date: 03/01/2018
Last Updated: 01/08/2019

Background

Most awards received in support of sponsored projects are eligible for a no-cost extension of time to the final budget period for the purposes of completing the sponsored project as originally proposed and funded 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 and Unit Administrator

- Confirm the availability of funds remaining.
- Review any change of effort commitment for key personnel.
- Provide chartstring for cost share, as applicable.
- Coordinate with Sponsored Project Administration.
- Prepare No-Cost Extension requests.
- Submit to Sponsored Project Administration for further processing.

Sponsored Project Administration

- Review no-cost extension request for compliance with sponsor requirements.
- Provide approval with notification to sponsor or submit to sponsor for approval, as applicable.
- Provide Authorized Official Signature.
- Upon approval update the UVM systems with the new expiration date.

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 options to have a no-cost extension approved:
1) UVM authorized no-cost extension, with SPA providing notification to the sponsor.
2) Sponsor approved no-cost extension

**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 and Department Administrator are all used interchangeably and refer to the person assisting the PI in the Department.)

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**Procedure**

**Reminders**

**Deadlines for NCE Requests**

No-Cost Extension requests should be submitted to RA no later than 30 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**

When federal and the first NCE, RA must provide written notification to the sponsor grant officer of the UVM approved extension at least (10) ten days prior to the original expiration date. If this notification deadline is missed, RA may not be able to exercise its ability to extend the grant, without sponsor approval.

**Level of Effort Confirmation**

It is widely 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 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.

Upon approval of the NCE, the adjusted time commitment will be updated 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 sufficient funds are available and no change in the project’s originally approved scope or objectives that would otherwise require sponsor approval, and 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 to your assigned SPA Research Administrator a completed NCE Request Form.

Submission of the NCE form to RA by email from the PI or UA constitutes PI confirmation of the information and approval to proceed.

Notes:
- The fact that funds are anticipated to remain unspent 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 PIs request for a NCE unless cost sharing is required.

**Federal Sponsor Requirements and Systems**

**National Science Foundation – Research.gov**
- PIs complete a NCE Request Form and emails to your assigned SPA Research Administrator.
- NSF requests should be submitted to RA at least 30 days prior to the end date of the grant.
- RA will complete the NCE process using Research.gov.

**National Institutes of Health – eRA Commons**
- PIs complete a NCE Request Form and emails to your assigned SPA Research Administrator.

  If this is a 2nd NCE request, include the following:
  - Number of months needed and new the project end date.
  - The amount of unobligated money still available.
  - Three PDF documents that will be uploaded to Commons:
    1) Progress Report
    2) Budget & Budget Narrative (NIH Format)
    3) Extension Justification Narrative
  - RA will complete the NCE process using NIH eRA Commons.

**NASA’s - Shared Service System**
- PIs complete the NCE Request Form and submit to your assigned SPA Research Administrator.
- 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 submit to your assigned SPA Research Administrator.
- SPA will complete the NCE process and notify NIFA Awards Management.

**Other Federal Sponsors:**
- PIs complete a NCE Request Form and submit to your assigned SPA Research Administrator.
- RA will coordinate and complete the NCE process following the Sponsor’s requirements for submission.

**Sponsor Approved No-Cost Extensions**

Coordinate the NCE request with your assigned SPA Research Administrator. Some sponsors will have an online award management system through which the NCE request is initiated by the PI.
Pay attention to Sponsor deadlines. NCE requests should be submitted to Sponsor within 45 days prior to the end date of the award.

In most cases when requesting a sponsor approved extension when not using an electronic system, the PI should construct a letter or email addressed to the sponsor’s contracting officer.

The letter should provide the following information:

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

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

PIs or UA should email the NCE Request Form to your assigned SPA Research Administrator for review, signature and submission to the sponsor.

SPA recognizes some sponsors are less formal than others. In these cases, SPA will accept reasonable and appropriate documentation from sponsor personnel that acknowledges NCE.

Upon sponsor’s approval or concurrence, SPA will extend the project’s end date, including any subprojects, as appropriate following award process by checking all compliance requirements.

**Subawards**

The OSA will coordinate with the UA and generate the no-cost extension amendment for those subrecipient’s needing additional time.

**FAQs**

N/A

**Helpful Links**

SPA No-Cost Extensions

Federal Sponsors:

NSF - FASTLANE

NIH – eRA Commons No Cost Extensions

NASA - No-Cost Extension Request

USDA – Grant Management FAQs

**Document Change Record**

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