

East Tennessee State University

Policy Title: Requesting a No-Cost Extension (NCE) of a Sponsored Project
Issued: 4/30/14
Responsible Official: Vice Provost for Research and Sponsored Programs
Responsible Office: Office of Research and Sponsored Programs

Policy Statement

Grants and sponsored agreements are awarded with the expectation that Project Director/Principal Investigator (PD/PI) will complete the sponsored project within a certain time frame. When that time frame cannot be met, the PD/PI may request a time extension at “no cost”, meaning additional time will be provided to complete the project, without additional funds. NCE requests are generally directed to the sponsor for approval. However, some sponsors permit the institution’s business representative, or the authorized institutional official, to approve or deny requests following sponsor-defined guidelines.

Purpose

The purpose of this policy is to outline when and under what conditions a no-cost extension of a sponsored project may be sought and the procedure for requesting a no-cost extension.

Definitions

Expanded Authority	The operating authorities provided to grantees under certain research grant mechanisms that waive the normally-required sponsor prior approval for specific actions. Under Expanded Authorities, the grantee (ETSU) may extend, one time only and without additional funds, the final budget end date by up to 12 months beyond the project's original expiration date as shown on the Notice of Award (NOA). 2 CFR 200.308
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No-Cost Extension (NCE)	<p>A no-cost extension is defined as an extension from the original award end date that does not require additional funding. These extensions are typically made for one year of additional time to assure adequate completion of the originally approved project.</p> <p>Examples of when such an extension may be requested are as follows:</p> <ol style="list-style-type: none">1. additional time is required to assure completion of the original approved objectives; or2. continuity of grant support is required while a competing application is under review; or3. extension is necessary to permit an orderly phase out of a project that will not receive continued support. <p><i>The fact that funds remain in the grant is not in itself justification for a no-cost extension.</i></p>
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Procedures

	PD/PI initiates all requests for extension of the project end date on a sponsored project by completing the Request for No-Cost Extension Form and submitting it to the ORSPA not less than 30 days prior to the project end date. The PD/PI must provide a clear justification for the request to extend the project period,
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	<p>sufficient for ORSPA staff to evaluate the request against the sponsor’s published conditions for granting an extension of the project. If the original award grants the institution expanded authority, ORSPA may approve an extension of the project period up to 12 months and will notify the sponsor accordingly. If the request requires the prior approval of the sponsor (i.e., in the case of a request for a second no-cost extension, even under expanded authorities), ORSPA staff will forward the request and justification provided by the PD/PI to the appropriate contact at the sponsor for review. The extension of effort of key personnel, in whole or in part, must be indicated on the Request for No-Cost Extension and approved by the cognizant department chair and dean. Any reductions in effort by senior/key personnel may require prior approval of the sponsor. ORSPA will notify Grant Accounting of the extension. Sponsor deadlines for final reports and closeout documentation will be extended accordingly.</p>
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Roles and Responsibilities	
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<p>Project Director/Principal Investigator (PD/PI)</p>	<p>The PD/PI is responsible for reviewing the sponsor’s policy regarding no-cost extensions and anticipating the need for a no-cost extension far enough in advance of the close date of the sponsored project to seek the necessary approvals. The PD/PI is responsible for initiating the request by completing the Request for No-Cost Extension Form, providing a legitimate justification for the request, and routing it for the necessary signatures prior to submitting it to ORSPA for review and approval. The PD/PI should allot at least 5 days for ORSPA’s review. The PD/PI is also responsible for responding to any sponsor inquiries regarding the request.</p>
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<p>Department/College</p>	<p>Department Chairs and Deans are responsible for reviewing the Request for No-Cost Extension prior to submission to ORSPA. Their signature on the Request indicates a confirmation and approval of the effort committed on the Request and an extension of the original commitment of resources made at the time of application.</p>
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<p>Office of Research and Sponsored Programs Administration (ORSPA)</p>	<p>ORSPA is responsible for reviewing the Request for No-Cost Extension against the sponsor’s guidelines and the Notice of Award (NoA). ORSPA will determine if the request requires prior approval. If the NoA extends expanded authorities to the institution, ORSPA will consider the justification for the request for no-cost extension and the unobligated balance of the award and allow or disallow the request. If the request requires prior approval from the sponsor, ORSPA is responsible for forwarding the request and the supporting information to the sponsor as soon as possible. If approved, ORSPA will notify the PD/PI, the sponsor, and Grant Accounting of the revised project end date.</p>
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<p>Grant Accounting</p>	<p>Grant Accounting is responsible for revising the project end date in the Banner system.</p>
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Related Forms	
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Request for No-Cost Extension Form	
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Links			
2 CFR 200.308			
Revision Dates			
3/9/15			
Subject Areas			
Academic	Research	Finance	Human Resources
✓	✓	✓	✓