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Policy or Procedure:				
Procedure: Implementing a No-Cost Extension				

Purpose

This procedure accompanies the OSP Policy for Prior Sponsor Approval Requests for Extramural Awards and is written to ensure that no-cost extension requests are managed effectively and in accordance with applicable sponsor requirements.

Reason for Procedure

Principal Investigators (PI) having externally funded projects at Northern Illinois University are expected to complete work under their awards within the project period specified within their award. There may be situations, however, when additional time is needed for the PI to complete the approved scope of work without the need for additional funding. Under these circumstances, the sponsor may consider a request to extend the expiration date of the award at no additional cost. This procedure serves as guidance for PI's who have determined a no-cost extension is necessary and wish to extend their project.

Reminder: The fact that funds remain at the expiration of the grant is not, in itself, sufficient justification for a no-cost extension.

Intended Audience

- Dean
- Senior Administration—Vice Provosts, Associate Deans
- Director, Department Chair, Division Head
- Faculty
- Departmental/Divisional Administrators
- Finance Personnel—Research Accounting, Accounting Services
- Grants & Contracts Personnel
- Research Compliance Personnel
- Research Integrity Personnel
- All Employees
- Information Technology Personnel
- Human Resources Personnel

Procedure

Federal Awards under Expanded Authorities

Many federal sponsors, including NIH, NSF, DOE, and USED have delegated to the grantee (NIU) the ability to internally approve an initial no-cost extension of up to twelve (12) months beyond the project period end date to complete the approved scope of work. This delegation is commonly referred to as “expanded authorities.”

NSF Awards: NSF requires notification of extensions be submitted through Fastlane **at least** ten (10) days prior to the project end date. The PI should initiate the notification procedure through Fastlane, and then push the “Submit to SRO” button to alert OSP that a notification is waiting to be processed. The IPAS form should be completed and submitted as stated in the step by step procedure below. It is not necessary to re-type the justification on the IPAS form if the PI attaches a print out of the justification entered into Fastlane. In this case, the IPAS is used primarily for internal approvals and compliance review. Once OSP receives the IPAS form and the extension has been submitted to the SRO (this is OSP), OSP will forward the notification to NSF via Fastlane and send an internal email to the PI, Department, College, and GFA indicating the extension is in place and the grant account will be extended accordingly.

NIH Awards: In accordance with NIH Notice OD-11-098, effective October 1, 2011, all grantees will be required to use the No-Cost Extension feature in the eRA Commons. After October 1, 2011 NIH will no longer accept these notifications via other communication channels (email, hard copy letter). The IPAS form should be completed and submitted as stated in the below procedure. OSP will submit notification of the extension to NIH via the eRA Commons upon receipt and review of the IPAS form and will send an internal email to the PI, Department, College, and GFA indicating the extension is in place and the grant account will be extended accordingly.

Non-Federal Awards and Federal Awards Not Under Expanded Authorities:

When it is necessary to request a no-cost extension from a non-federal sponsor or federal agency that requires approval for extensions, the PI should write a letter to the Program Officer stating the reason the extension is necessary. It is important that this letter clearly identify the sponsor award number, justification for the request, and requested expiration date. The letter should include a signature block for the signature of the Authorized Organizational Representative (AOR). The AOR is Dr. David A. Stone, Associate Vice President for Research. Your GFA administrator or OSP Development Specialist can provide you with a template letter. Note however that the content for these requests can vary by sponsor. Some sponsors may require information about the amount of funds remaining in the account and others may request a detailed budget indicating how funds remaining at the end of the original project period will be spent during the extension. When in doubt, ask your GFA administrator or OSP Research Development Specialist before you begin preparing your request.

The IPAS form should be completed and submitted with the original letter in accordance with step by step procedure below. Upon OSP final review, the letter will be endorsed by the AOR and submitted directly to the sponsor from OSP. OSP will send an email notifying the PI, Department, College, and GFA that the extension has been submitted. When approval for the extension is received from the sponsor, OSP will send an internal email to the PI, Department, College, and GFA indicating sponsor approval and the grant account will be extended accordingly. If the extension is not approved, the PI should begin preparing the

final progress report and any other reports that may be required of the award and GFA will initiate the close out process for the grant.

NSF Approved No-Cost Extension: NSF must approve no-cost extensions beyond the initial twelve (12) months available under expanded authorities (commonly referred to as a “2nd no-cost extension”) and when extensions under expanded authorities (commonly referred to as a “1st no-cost extension”) are not submitted within the required timeframe.

NSF approved no-cost extension requests must be submitted via Fastlane **at least** 45 days prior to the project period end date. NSF will require an estimate of the unobligated funds remaining and a plan for their use to be included in the request submitted via Fastlane. Contact your GFA administrator to discuss this information before developing your request. The IPAS form should be completed and submitted as stated in the procedure below.

NIH Approved No-Cost Extension: As with NSF, NIH must approve no-cost extensions beyond the initial twelve (12) months available under expanded authorities and when the initial extension is not submitted to NIH within the required timeframe.

NIH approved no-cost extensions should be submitted **at least** 45 days prior to the project period end date but **no later** than 30 days before the end date. The procedure below should be used for submitting a NIH approved no-cost extension. NIH will require an estimate of the unobligated funds and a detailed plan outlining how the funds will be used during the extension period. Contact your GFA administrator to discuss this information before developing your request.

Steps to Request a No-Cost Extension:

PI's are *strongly* encouraged to initiate the approval process for a no-cost extension within sixty (60) days prior to the project end date but *no later than twenty (20) days before the project end date*. This timeframe is necessary to ensure adequate review prior to submission and/or notification to the sponsor. NIU loses the ability to approve a no-cost extension if the notification is not completed within the sponsor's required timeframe. Most sponsors require notification *at least* ten (10) days prior to the project end date. If NIU does not submit notification of the extension within the sponsor's required timeframe, the sponsor will have to approve the extension.

1. Complete the Institutional Prior Approval (IPAS) form. This form can be found on both the Office of Sponsored Projects (OSP) and Grants Fiscal Administration (GFA) websites under the Forms section of each website. The IPAS form includes three (3) sections to determine whether:
 - Sufficient funds remain in the account to support the project for the additional time period;
 - Appropriate compliance protocols remain in place if the project involves human subject research, animal use, or biosafety hazards;
 - A significant change in key personnel effort is planned during the extension period.
2. After the IPAS form is completed and the PI and Chair have signed, the form should be sent to the PI's GFA administrator.

3. The GFA administrator will review the request to confirm that adequate funds remain and will forward the request to OSP for final approval and to notify the sponsor of the extension.
4. After OSP approves the request and notifies the sponsor of the extension, OSP will notify the PI, PI's Department Chair, College, and GFA via email so the end date on the grant account can be extended.

*The IPAS serves as a reminder to PI's that **all** terms and conditions in effect during the original project period will continue through the extension period.*

Contact Information:

Subject	Contact	Phone	E-mail
Policy Questions	Dara Little, Associate Director, OSP	(815) 753-9285	dlittle@niu.edu
OSP Approvals	Dara Little	(815) 753-9285	dlittle@niu.edu
Grants Administration	LaRonda Thuestad, GFA	(815) 753-1576	grantsfiscal@niu.edu

Frequently Asked Questions (FAQ's)

When should I request a no-cost extension?

While individual sponsor requirements vary, most sponsors require notification of a no-cost extension be made at least ten (10) days prior to the project end date. For extensions that require sponsor approval, the request should be submitted at least thirty (30) days before the project period end date. OSP recommends initiating the no-cost extension process at least sixty (60) days prior to the project end date to allow the NIU grants staff sufficient time to review and approve the request and to provide the sponsor with adequate review time as well.

How long of an extension can I request?

You should request the actual amount of time needed to complete the project. Most sponsors will not allow more than twelve (12) months per request. We suggest twelve (12) months, but no less than six (6) months.

My sponsor allows me, the PI, to go directly into their grants system and submit a no-cost extension request or notification. Do I still need to complete the IPAS form and go through this process?

Yes, the IPAS process should still be followed before you put forth a request or notification for a no-cost extension. The IPAS is intended to ensure all appropriate parties are aware of the planned project change and for grants staff to screen for any potential compliance concerns.

Is this IPAS form submitted to the sponsor?

No, the IPAS is not submitted to the sponsor. It is an internal approval document, similar to the OSP System Tracking and External Project (STEP) form that is routed with proposals. This IPAS is intended to ensure all appropriate parties are aware of the planned project change and for grants staff to screen for any potential compliance concerns. For changes such as no-cost extensions that can be approved at the Institutional level (e.g. those considered under "expanded authorities"), the IPAS form captures the information required by sponsors for NIU to approve the change.

What are appropriate reasons for requesting a no-cost extension?

Some examples for justifying the need for a no-cost extension include:

- Additional time is needed to assure completion of the original approved project scope and objectives.
- Lack of success in locating a graduate student with suitable capabilities.
- Extensive delay in production or shipment of key equipment or supplies.
- Transfer of a key project participant, or time lost due to illness/injury of a key project participant.
- Continuity of grant support while competitive continuation is under sponsor review

Wouldn't I save time if I sent my request directly to the sponsor?

In some cases yes. However, many sponsors require that the Authorized Organizational Representative (AOR) countersign the request before submission. Also, it is generally advantageous to receive Institutional approval of the extension even when sponsor approval is not required. Therefore, all requests

should be submitted through the IPAS procedure so the grants staff can determine the most appropriate method of approval.

What if I need more time beyond my first 12 month no-cost extension? Can I request a second no-cost extension?

Yes. However, some federal sponsors will not consider a request for a second extension. When a second request is allowed, it usually requires direct review by the sponsor and a lead-time of approximately 60 days. For more information, consult the terms and conditions of your award agreement, sponsor guidelines, or contact your GFA administrator or OSP for guidance.

Do I have to continue to commit effort on the project during the extension period?

Yes. The terms and conditions of your original award, including your original commitment of effort, continue unless amended.