

Division of Biology and Medicine No-Cost Extension Guidance

Federal agencies have waived certain prior approval requirements for increased flexibility and to lessen PI administrative burden. One requirement waived is *one-time* authority to extend without funds the final budget period of a grant project period from a sponsoring agency (No-Cost Extension/NCE).

While sponsors expect Principal Investigators (PI) to complete projects by the specified end date, occasionally extra time is needed. A NCE gives the PI extra time to complete the scope and objectives of the project without additional funds provided by the sponsor. Although requests may not be made for the sole purpose of spending remaining funds, remaining funds may be spent during the no-cost extension period.

The authority to approve one-time NCE assumes an internal review and approval process has taken place at the grantee institution. Brown University assures this process by using the University Prior Approval System (UPAS) found at [Brown University UPAS Form](#). Once the UPAS/NCE request is reviewed and approved the extension is processed through the appropriate agency system. The NCE must be requested in advance of the end date of an award. Thirty (30) days in advance is recommended as a best practice and should include:

1. A scientific rationale for extension.
2. Indication that the work on the project is not yet complete. Some examples of reasons include:
 - Additional time is needed to assure completion of the original approved project scope and objectives.
 - To repeat tests to obtain results lost due to extenuating circumstances.
 - Extensive delay in production or shipment of key equipment, reagents, supplies, etc.
 - Delay in hiring of technical staff
 - Loss of a key project participant, or time lost due to illness of a key project participant.

3. All original terms of the award remain in effect during a no cost extension period:

- PI effort: active awards must have a measureable level of effort. When submitting NCE state the level of effort for all key personnel. ***NIH does not require prior approval for the reduction in effort for Senior/Key personnel** with the exception of grants that have an effort requirement, or where terms and conditions prohibit such reductions ([NIH GPS 8.1.1.3 Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds](#))

- All certifications and assurances must be up to date.
 - All protocols (i.e., IACUC, IRB, etc.) must be up to date and active during the NCE.
4. Funds must be available to cover costs during the no cost extension period.
 - **Note:** some agencies/sponsors, such as NSF, will not extend awards with a zero balance.
 5. Extensions may not be exercised merely for the purpose of using unobligated balances.
 6. All NCE requests must include approval of department chair.
 7. Forward approved NCE to BMRA for submission to the agency/sponsor (OSP if decentralized).

**Change applies to all NIH grants and cooperative agreements for budget periods beginning on or after October 1, 2015.*

DIVISION REQUIREMENTS CHANGE IN PI EFFORT

Cost share approval is required from Chair and Associate Dean of Biology if effort cannot be paid from grant.