

PROCESS FOR REQUESTING A FIRST NO-COST EXTENSION ON MOST FEDERAL GRANTS (INCLUDING NIH)

- ORPA has the authority to approve a first no-cost extension on most federal grants, including NIH. For audit purposes though, the PI must email their ORPA RA with a scientific justification for the extension. A no-cost extension can be requested and processed if:
 - 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.

The fact that funds remain at the expiration of the grant is not, in itself, sufficient justification for an extension without additional funds.

- In addition, the email should clearly note if a 6, 9 or 12 months no-cost extension is needed. If the grant involves human subject research and/or animals, the ORPA RA will need current IRB or IACUC approvals before they can process the extension.

- And finally, the email should also clarify the proposed effort to be devoted during the no-cost extension period of all key personnel named on the sponsor's Notice of Award (the PI is always key but sometimes, the Sponsor identifies other investigators as key). Unless we notify the sponsor otherwise, it is assumed that effort will remain the same during that period. If effort will be significantly reduced (i.e. a reduction of 25% or more from what was originally approved), we will need to request approval for the reduction in effort from the sponsor at least 30 days prior to the end date.

If effort will not be significantly reduced, the department will need to determine if sufficient funds remain in the grant account to cover that effort during the whole no-cost period. If insufficient funds remain, an internal cost-sharing form will need to be completed and sent to the ORPA RA.

- The request for the extension should be provided to the ORPA RAs at least 20 business days prior to the projected end date.

For second no-cost extensions, prior approval from sponsor is always required. Contact your ORPA RA for additional guidance on second no-cost extension requests.