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No-Cost Extension Application Policies and Procedures

Introduction
The purpose of this memo is to inform the Principal Investigator (PI) and his/her research team of the policies and procedures that apply to no-cost extension requests. A no-cost extension is defined as an extension of the award end date without additional funds from the extramural funding agency.

This memorandum is organized in the following sections:

The sections in this memo highlighted in orange are instructions on placement of documentation in InfoEd.

Please contact your assigned GCO Grants Specialist for any questions you may have. For a listing, please click here:

I. Extramural Funding Agency Policies and Procedures
Policies and procedures for no-cost extension requests vary from funding agency to funding agency. Many agencies include the information in a notice of award (NOA), sponsored project agreement, and/or policy and procedure documents available on their website. Some funding agencies may require a formal request letter endorsed by an Authorizing Organization Representative (AOR) several days or several months prior to a project end date whereas others may not allow a project to continue past its approved end date. It is important to refer to the agency's guidelines to determine eligibility.

II. NIH Policies and Procedures
A. Eligibility
   Most NIH awards are eligible for no-cost extensions. To obtain a no-cost extension on a NIH grant, the following statement must be true:
   - No term of award specifically prohibits the extension.

   In addition, one or both of these statements must also be true:
   - Additional work needs to be completed on the project and resources are available to continue to support the project, or
   - Additional time is needed to provide for an orderly closeout.

B. ISMMS's Authority to Approve Initial No-Cost Extension
    NIH allows the grantee institution to approve an initial no-cost extension for a period of up to 12 months beyond the original expiration date. GCO can approve the NCE request after confirming eligibility (see section II.A) and the following condition:
    - The project has not expired.
    If the project has expired, see additional guidance in section II.C, below.

    1. GCO Initial No-Cost Extension (NCE) Request and Progress Report Form for NIH Grants
    PIs may use the "GCO Initial No-Cost Extension (NCE) Request Form for NIH Grants" to prepare the request to the GCO. This optional form includes the following sections:
    - Brief overview of progress to date
    - Scientific justification for no-cost extension / brief overview of activities to be accomplished

    In addition, the form includes sections for the PI to inform the GCO of the following plans and activities:
    - Length of no-cost extension request
    - Extension of the NCE to the subaward(s); form includes a list of required subaward documentation
    - Change in scope of approved project

    Upload GCO's form in the Progress Report tab of your InfoEd application. If you do not use the form, please address the bullet points above as applicable.   Upload the progress report in the Progress Report tab of your InfoEd application and administrative information in the Internal Documents tab.

C. NIH Prior Approval Required for Other No-Cost Extension Requests
    NIH must approve the following types of no-cost extension requests:
    - Late Request of Initial No-Cost Extension
    - Additional No-Cost Extension Request after Initial Request
    - NCE Requests for NIH Awards that Do Not Allow Automatic Approvals by GCO

    This prior approval request is due to the NIH 30 days in advance of the proposed change. In the case of late initial no-cost extension requests, please do submit as soon as possible.

    ISMMS does not have the authority to approve these requests. There are two submission methods to the NIH: 1. Letter/E-Mail; 2. eRA Commons Prior Approval Module. Please check with your designated GCO Grants Specialist on the preferred method (i.e., email or eRA Commons).

    1. Letter/E-Mail
        Please prepare a letter or e-mail that will be countersigned by the PI and the AOR (i.e., GCO representative). Contact information is provided in each NOA and available by logging into eRA Commons and locating your award. Address the communication to your Grants Management Specialist and cc the Program Officer. Please include the following information in your request:
        - PI Name, Tel No., Fax No., and E-Mail Address
        - NIH # and Grant Title
        - Length of no-cost extension request and no-cost extension end date
        - Approximate total cost balance

- Brief overview of work to date
- Description of project activities that require support during the extension
- Description of the use of funds during the NCE (e.g., 10% of PI time, 25% for research coordinator, $s for assays, etc.)
- PI Maintaining Measurable Effort: Y/N
- Budget and budget justification

2. eRA Commons Prior Approval Module
   The Prior Approval module allows institutions to submit prior approval requests via eRA Commons. The designated AOR logs in to eRA Commons and initiates, uploads the documentation, and submits the request in the Prior Approval module. The PI/Delegate do not initiate the request in Commons.

   When the request is submitted on the Prior Approval Module, below are the additional details and documents required for the request. Please send the all required documentation to the GCO separately as they are also uploaded separately, please refer to eRA Commons screenshots below.

   Submit the following details about the no cost extension to the GCO:

   - Number of Months
   - Amount of Unobligated Balance
   - Does PI Maintain Measurable Effort

   Submit the following documents to the GCO:
   - Progress Report
   - Budget Document
   - Justification Document

No Cost Extension eRA Commons Screenshots

NOTE:
- A remaining balance at the project period end is not in itself sufficient justification for a no-cost extension.   Please refer to the NIH Grants Policy Statement, Section 8.1.1.3 entitled "Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds" for further information.
- All award terms and conditions continue during the NCE period.

- NIH prior approval for reduction in key personnel effort of 25% or more is <u>not</u> required in the no cost extension period. See NOT-OD-16-030 for non-competing budget periods that begin after 10/1/15.
- PIs do not submit an Annual RPPR application to the NIH. Also please note that PIs have up to 120 days after the grant expires to submit the Final RPPR to the NIH. Click on the NIH RPPR webpage for more information.

III. GCO Submission Policies and Procedures

  A. GCO Application Submission Process
Refer to GCO's Application Submission Checklist (ASC) and Instructions and follow the appropriate steps.. All no-cost extension applications must be prepared in InfoEd and routed for approval through the department(s) in which there are key personnel and/or faculty. Simply requesting and obtaining a no-cost extension approval from the funding agency is not sufficient. In InfoEd, you will need to create an additional non-system to system submission and you will choose the "Non-Competing Continuation (non-S2S, no budget)" option when prompted in the initial setup tab.   Any documents that the funding agency requests from you, you must also submit those to the GCO as part of your InfoEd application.

  B. Length of No-Cost Extension
No cost extensions are typically requested for one year; however, they can be shorter depending on the time needed to ensure adequate completion of the approved project.

  C. Projects with Subawards
Projects with continuing subawards must also include the following documents:
- Signed Statement of Intent to Establish a Consortium Agreement
- Statement of Work (SOW) <u>or</u> a confirmation statement from the PI that the SOW has not changed.

In accordance with NIH notice NIH Final Updated Policy Guidance for Subaward/Consortium Written Agreements (NOT-OD-23-182), foreign subaward institutions must provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, to the primary recipient with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. Such access may be entirely electronic, but will be via a method determined by the Prime Institution.

Foreign subaward institutions must either use Mount Sinai's subward letter of intent or include the equivalent language above.

  D. Request Letter / Approval Letter from the Funding Agency
Please include the no-cost extension request and the agency's approval notification, if you received that as well.
Please upload the document (s) in the Internal Documents tab of your InfoEd application. In cases where the progress report is incorporated in the no-cost extension request, please upload this document in the Progress Report tab of InfoEd. For NIH grants, see section II above.

  E. Progress Report and Other Agency Specific Documentation
All no-cost extension applications must include a progress report following the funding agency specifications. For NIH grants, see section II above. If the funding agency does not require a progress report, please include at a minimum the following information for GCO review:

- Brief overview of progress to date
- Scientific justification for no-cost extension / brief overview of activities to be accomplished

> Please upload the progress report in the Progress Report tab. Please upload any other documentation the funding agency requires in the Progress Report tab or the Internal Documents tab.

IV. Roles and Responsibilities

A. PI/Department Administration

The PI and the department confirm through the InfoEd no-cost extension submission process that resources are available to continue the project. PIs may inquire with their administrator regarding any other departmental policies and procedures.

B. GCO

During GCO's review process, the GCO Grants Specialist reviews the NOA and/or any other documentation as written in section I. above to determine whether the request is in compliance with the funding agency's terms and conditions.   He/she also reviews the PI's progress report to confirm that additional work needs to be completed. GCO may also submit the request to the funding agency depending on their requirements. For funding agencies that require endorsement by an institutional official, GCO's Authorizing Organization Representative (AOR) is also responsible for endorsing the request.

V. Submission and Approval Steps

Step 1 - PI Reviews the Extramural Funding Agency's Policy on No-Cost Extension
Funding agencies may require a no-cost extension request days or months prior to a project end date. See section I and II for additional information on funding agency requirements.

Step 2 - PI Inquires with Department Administration on Standard Operating Procedures (SOPs)
PI may inquire in his/her department regarding the time needed to review and approve the InfoEd no-cost extension application as well as any other departmental policies and procedures.

Step 3 – PI Submits Compliance (PPHS and/or IACUC) Application to Compliance Office, if applicable
Many projects share the same yearly start and end dates as the GCO / InfoEd submission. In these cases, a corresponding PPHS/IRB or IACUC submission is required prior to InfoEd submission. In other cases, the PPHS yearly start and end dates are different from the GCO / InfoEd yearly submission dates. In the case that they are not in sync, submission of an upcoming year's PPHS application may be premature. Please check when your IRB approval ends. IRB submissions are submitted generally 8 weeks prior to expiration.

Step 4 - PI Submits InfoEd Application and Routes to the Department

Step 5 - Department(s) Reviews and Approves InfoEd Application and Routes to the GCO
Please allow for review and approval time at the department level.

Step 6 - GCO Reviews and Processes NCE Request
GCO requires the COMPLETE AND FINAL InfoEd application, including completed and signed Conflict of Interest and Suspension and Debarment forms as appropriate, 1 business day prior to the extramural funding agency deadline. See other requirements in sections I-III above.

Step 7 - GCO Receives Extramural Funding Agency's Approval and Activates the NCE
GCO updates the status of the no-cost extension request from pending to active/awarded after receipt of funding agency's approval.

If the funding agency sends the approval notification to the PI bypassing the GCO, please e-mail it to grants@mssm.edu and include the project's GCO # in the e-mail.

For initial NIH NCE requests submitted prior to the grant's expiration, GCO has the authority to approve the NCE on eRA Commons. Once GCO approves, the PI and the GCO then receive a system generated e-mail from eRA Commons confirming that the grant end date has been extended.

Step 8 - GCO Notifies Finance
GCO informs Finance of the no-cost extension. Finance extends the fund account end date and begins the process of extending the subaward agreements as applicable.

VI. Additional Resources
- GCO Application Information Website
- GCO Application Submission Checklist and Instructions
- GCO Guidance on NIH Prior Approval Requirements
- NIH Policy Guide - Section 8.1.1-8.1.3 includes information about no-cost extension requests

VII. Significant Changes to this Document from Prior Versions

Date	Description
11/2023	Added option of submitting no cost extension (NCE) other than initial NCEs via the eRA Commons Prior Approval module Added required certification for foreign subawards.