

## No-Cost Extensions Policy

If project work is on-going and funds remain available to cover project expenses, it may be appropriate to request a no-cost extension. Considerations include award terms, funding for committed effort on the project, timing, and approvals required. It is not allowable to simply request a no cost extension based on availability of funds; rather, extension requests must be based on additional time needed to complete the aims of the project.

While OSP encourages PIs to communicate progress on sponsored projects to program officials, **formal requests for no-cost extensions must be submitted to the sponsor by OSP following internal review.**

Considerations in requesting a no-cost extension:

- I. **Direct award terms:** The Notice of Award/Contract/Award Document should provide information as to whether or not sponsor prior approval for a no-cost extension is required. This information is based on the following review of the award terms and conditions.
- II. **NIH grants under expanded authorities:** Most NIH grants allow Lurie Children's to approve, internally, ONE extension of up to 12 months. Subsequent extensions require sponsor approval. PIs should facilitate approval below to request extensions to NIH awards within the 30-day period leading up to the end date, and no later than 15 days prior to the end date.
- III. **Clinical study agreements:** Many CSAs do not include an end date. If there is no specified term of agreement or end date, then the project dates can be extended while the study is active, with internal approval.
- IV. **Subrecipient agreements, corporate agreements, federal contracts, and other awards:** Sponsor approval is required, in accordance with award or subaward terms.
- V. **Committed effort:** Unless otherwise notified, sponsors, particularly Federal agencies, expect PIs (and other key personnel) to provide the level of effort outlined in proposal budgets. For Federal awards, the Principal Investigator and Key Personnel are expected to maintain the same, committed level of effort throughout a project, including a no-cost extension period.

## **Procedure for requesting a No Cost Extension:**

1. **PI review with OSP post-award staff:** 30 days prior to the end date of the study, PI/delegate must send an email to the OSP post-award staff contact and the Director, Office of Sponsored Programs, requesting an extension. PIs are encouraged to work with OSP post-award staff on extension period budget projections prior to this request. The following information must be included in the request:
  - Fund Number
  - Current End Date
  - Requested New End Date (limit up to 12 months)
  - Reason for the no cost extension
    - Additional time needed beyond the expiration date is require to assure completion of the original approved scope of work
    - Continuity of grant support is required while a competing application is under review
    - The extension is necessary to permit an orderly phase out of the project that will not receive continued support
    - Other Reason not listed
  - Detailed budget for no cost extension period
  - Level of effort charged for key personnel on this project will remain throughout the no cost period unless approval is requested to change/reduce level of effort charged to project and/or cost shared.
  - NOTE: If your project involves human subjects or animals, you must also ensure that you have current approval that will cover the additional extension period.
  - Effort Reports for no cost extension period will reflect new end date of project and level of effort approved.
2. **Request to sponsor:** Following OSP review and approval, OSP staff contact the sponsor in accordance with award terms, to request the no-cost extension. OSP will facilitate communication between the PI and sponsor if additional documentation is requested, through approval or disapproval by the sponsor.
3. **Award update:** Following sponsor determination, OSP will facilitate extension of the current award or initiate closeout of the award.