NIH Second No-Cost Extension Policies

- Second no-cost extensions requests must be brought to NIH for prior approval.
- Request the department to prepare the following:
  - Progress Description to Date
  - Progress Description to be completed in the NCE period
  - The estimated amount of funds available during the NCE period
  - A budget and budget justification of the estimated amount of funds available
- Locate the Grants Management Specialist (GMS) e-mail address in the NOA
- E-mail the second no-cost extension request to the GMS
  - The e-mail must come from an Authorized Organization Representative (AOR)
    - The approval/AOR status must be obvious in the e-mail (Example: Title in signature block; "I am requesting on behalf of the PI…" language in e-mail body)
  - The subject line must include the full sponsor number (found on NOA, not in Coeus)
  - The e-mail must contain: the name of the grantee, the PI & AOR's telephone number, fax number, and e-mail address.
  - The request must be sent no later than 30 days before the current end-date of the award
  - Official, signed memos from the GCO and/or PI are not required
  - Include all of the items listed in the "Request the department to prepare the following" section above – otherwise, the GMS will request the additional missing information.

ORSPA-specific Policy Interaction with NIH Second No-Cost Extension Policies

- Confirm that a first no-cost extension has already been processed
- Request department to provide all of the information in the "Request the department to prepare the following" section above before processing the OAF any further
- Confirm that the estimated amount of funds that will be available is reasonable
- Submit the request even if it is late – NIH has some leniency.
- Discontinue processing the request if there are no total project costs remaining to expend in the project

NIH Grants Policy Statement: Applicable Language
EXCERPTED FROM: http://grants.nih.gov/grants/policy/nihgps_2010/nihgps_ch8.htm

8.1.1.3 Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds

The grantee may extend the final budget period of the previously approved project period one time for a period of up to 12 months beyond the original expiration date shown in the NoA if

- no term of award specifically prohibits the extension,
- no additional funds are required to be obligated by the NIH awarding IC, and
- the project's originally approved scope will not change.

Such an action affirms that additional work remains to be completed on the project and that resources are available to continue to support the project, or that additional time is needed to provide for an orderly closeout. The fact that funds remain at the expiration of the grant is not, in itself, sufficient justification for an extension without additional funds.

8.1.2.1 Additional No-cost Extension or Extension Greater Than 12 Months or Late Notification of Initial No-Cost Extension

…Any additional project period extension beyond the initial extension of up to 12 months requires NIH prior approval. The request should include a description of the project activities that require support during the extension and a statement about the funds available to support the extension. Further any late notification of the initial no-cost extension provided by the NIH Standard Terms of Award also requires prior approval.

8.1.3 Requests for Prior Approval

All requests for NIH awarding IC prior approval must be made in writing (including submission by e-mail) to the GMO no later than 30 days before the proposed change, and signed by the AOR. If the request is e-mailed, it must provide evidence of the AOR's approval; a cc to the AOR is not acceptable. Failure to obtain required prior approval from the appropriate awarding IC may result in the disallowance of costs, termination of the award, or other enforcement action within NIH's authority.

E-mail requests must be clearly identified as prior approval requests, must reflect the complete grant number in the subject line, and should be sent by the AOR to the GMO that signed the NoA. Contact information is provided on each NoA and is also available in the eRA Commons. E-mail addresses for NIH staff can be also obtained from the NIH Enterprise Directory at: https://ned.nih.gov/search/. E-mail requests must include the name of the grantee, the name of the initiating PD/PI, the PD/PI's telephone number, fax number, and e-mail address, and comparable identifying information for the AOR.

The GMO will review the request and provide a response to the AOR indicating the final disposition of the request, with copies to the PD/PI and to the cognizant NIH PO….

…If an action by a consortium participant will result in a change in the overall grant project or budget requiring NIH approval, the prime grantee must obtain that approval from NIH before giving its approval to the consortium participant.