Virginia Commonwealth University No-Cost Extension Procedures:

Principal Investigators (PI) with externally funded research projects at Virginia Commonwealth University are expected to complete work under their awards within the project period specified within their award. There are times, however, where the PI needs additional time in order to complete the approved scope of work without additional funding. Under these circumstances, the sponsor may consider a request to extend the expiration date of the award at no additional cost.

Funds remaining in the account is not a justifiable reason for requesting an extension. Extensions may be requested only for programmatic reasons (such as the work took longer than expected). However, it is appropriate to state that sufficient funds remain in the account to support the project for the additional period of time. If the project involves human subject research or animal experimentation, updated approvals valid for the length of the extension are necessary. If the portion of the work involving human subjects or animal experimentation has ended, a statement to this effect should be provided.

Special attention should be given to sponsor guidelines covering percent effort/person months for key personnel during an extension period. Many sponsors including NIH and NSF require prior approval if the percent effort/person months for key personnel are reduced more than 25% from what was approved for the most recent budget period. In short, all terms and conditions in effect during the original project period will continue through the extension period. All applicable compliance approvals must be maintained through the extension period.

Investigators should continue to report applicable effort on Other Support documentation during no-cost extensions.

Procedure: The University's standard No-Cost Extension Request Form should be completed, which can be found at: http://www.research.vcu.edu/forms/no_cost_extension_form_sept2011.pdf. The form should be filled out, saved to a pdf file, and forwarded, with any required attachments as outlined below, via e-mail to dirospa@vcu.edu. OSP will then electronically submit the extension request or notification to the sponsor. When approved, OSP will notify the PI/department. OSP will also advise the Grants & Contracts Accounting Office so that the end date on the research account can be extended.

Federal Awards:

Most federal agencies have delegated the responsibility for approving no-cost extensions for grants to the institution. NSF, NIH, ARO, AFOSR, NEA, NEH, DOE and DOED allow the Office of Sponsored Programs (OSP) to internally approve a one-time request to extend the end date of the project period up to an additional 12 months.

Note: Other federal agencies, including ONR, still require agency approval for no-cost extensions. Follow the procedure for Non-Federal Awards below.

Exception for NSF awards: NSF requires that notification of extensions be submitted through FastLane. The PI or research administrator should initiate the notification procedure through FastLane, then push the Submit to SRO button to alert OSP that a notification is waiting to be processed. OSP will forward the notification to NSF via FastLane.

Timing: In most cases, the sponsoring agency must be informed about the extension well before the original expiration date. Therefore, requests for extensions should be processed at least four (4) weeks before the grant period ends.

Non-Federal Awards:

When it is necessary to request a no-cost extension from a non-federal sponsor or from a federal agency that requires agency approval for extensions (ONR), the PI should write a letter to the appropriate official as identified in the award document (usually Program Officer or Grants Management Officer) The letter should include: 1) justification for the no-cost extension; 2) the sponsor's award number; 3) the new requested expiration date; 4) Principal Investigator signature; and 5) OSP countersignature. Submit the letter to OSP with the standard No-Cost Extension Request Form.

When approval for the extension is received from the sponsor, OSP will inform the PI/department and advise the Office of Grants & Contracts Accounting to change the project end date.

For non-federal contracts such as pharmaceutical company clinical trials that do not specify an end date in the contract, the University's standard No-Cost Extension Request Form should be completed and forwarded to the OSP for review and approval. All applicable compliance forms are still required.

Explanation: Funds remaining in the account is not a justifiable reason for requesting an extension. Extensions may be requested for programmatic reasons only. Some sponsors may request information about the amount of funds remaining in the account and others may request a budget indicating how funds remaining at the end of the original project period will be spent during the extension. When in doubt, consult the original award and/or the Office of Sponsored Programs.

Timing: The letter requesting approval for a no-cost extension must reach the sponsor well before the expiration date in order to allow the sponsor time to process the request and inform VCU of the approval before the project period ends. Please refer back to the sponsor agreement or guidelines if there are any questions regarding timing.

Second No-Cost Time Extensions

For all Sponsors, the Principal Investigator must prepare a letter requesting a second extension, providing full justification, and include a detailed budget for the remaining funds. The letter must be countersigned by OSP prior to submission to the Sponsor. The letter must be received by the Sponsor well before the end date to be eligible for consideration. Requests for extension should be processed at least four (4) weeks before the grant period ends. **Submit the letter to OSP with the standard No-Cost Extension Request Form.**