University of Pittsburgh No-Cost Extension Procedures:

Federal Awards:

Principal Investigators (PI) having externally funded research projects at the University of Pittsburgh 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. 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 Research (OR) 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.

Procedure for Internal Approval: The University’s standard No-Cost Extension Request Form should be completed. The form, which can be found at: [http://research.pitt.edu/formstemplates](http://research.pitt.edu/formstemplates), requires signatures from the PI, the Chair and the Dean. Once signed, the form should be sent to OR for review and approval. The OR will then electronically submit the extension request to the sponsor if required. When approved, the OR will notify the PI/department. The OR will also advise the Office of Research/Cost Accounting so that the end date on the research account can be extended.

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 the OR that a notification is waiting to be processed. The No-Cost Extension Request Form should be sent to OR as usual. However, the form in this case is needed only to capture internal approvals and applicable compliance forms since the justification for the request is being submitted through FastLane. In lieu of the No-Cost Extension Request Form, an electronic verification process is also available, but must be arranged with the department’s assigned Grants and Contracts Officer in OR prior to circulation. Once all information has been received and the request has been approved, OR will forward the notification to NSF via FastLane.

Explanation: The University’s standard No-Cost Extension Request Form contains two questions that when answered completely provide the necessary justification for the extension. 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 notification if the percent effort/person months for key personnel deviate 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.

**Timing:** In most cases, the sponsoring agency must be informed about the extension no later than 10 days prior to the original expiration date. Therefore requests for extensions should be processed at least two 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, such as ONR, that requires agency approval for extensions, the PI should write a letter to the Program Officer stating the reason why an extension is necessary. This letter should be signed by the PI, department chair and dean of the school before sending to the OR.

The letter should clearly indicate the sponsor’s award number and the requested expiration date. The format included in the standard No-Cost Extension Request Form can be used, but it is not mandatory. The letter should be forwarded to the Office of Research for review and counter-signature prior to the department sending the request to the sponsor. When approval for the extension is received from the sponsor, OR will inform the PI/department and advise the Office of Research/Cost 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 OR for review and approval. All applicable compliance forms are still required.

For non-federal projects having separately received an amendment or modification extending the award without additional money, OR will require internal signatures either through the University’s standard No-Cost Extension Request Form or another comparable method that documents the necessary internal approvals. 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 Research.

**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 Pitt of the approval before the project period ends. Please refer back to the sponsor agreement or guidelines if there are any questions regarding timing.