



UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL

TITLE:	No Cost Extension Policy	REFERENCE:	New
CATEGORY:	Office of Research Administration	PAGE:	1 of 2
		SUPERSEDES:	New
APPROVER:	Barbara A. Cole Associate Vice President Office of Research Administration	VERSION:	New
		EFFECTIVE:	March 31, 2016

PURPOSE:

The purpose of this policy is to establish uniform guidelines for no cost extensions (NCE) for sponsored activities at UM in accordance with 2 CFR 200, Federal and State regulations, as well as sponsor terms and conditions.

Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

SCOPE:

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:

A NCE may be requested from the Office of Research Administration (ORA) by the Principal Investigator (PI) when all three of the following conditions are met:

- The end of the project period is approaching; AND
- There is a programmatic need to continue the research; AND

- There are sufficient funds remaining to cover the extended effort.

Sponsor requirements regarding prior approvals vary and must be observed when planning a NCE request. Unless a longer period is required by the sponsor, the first NCE request for up to twelve months must be submitted to ORA for approval a minimum of 30 days prior to the end of the current budget period. If prior sponsor approval is required, ORA will submit the request to the sponsor. All second NCE requests or requests for extensions exceeding twelve months must be submitted to ORA for approval a minimum of 60 days prior to the end of the current budget period.

Extensions may be requested only for programmatic reasons (such as the work took longer than expected). Funds remaining in the account is not a justifiable reason by itself for requesting an extension, however, it is appropriate to state that sufficient funds remain in the account to support the project for the additional period of time.

All requests should include a brief statement of the need, an estimate of total funds that will remain unspent as of the current expiration date, an indication of how the balance will be used during the extension period, the number of additional months required, limited to 12 months.

Sponsors expect that the original award terms and conditions will extend throughout the project period, including a no-cost time extension period. This would include commitments of effort for the PI and other named key personnel on the proposal. Some agencies allow for a reduction of effort for senior/key personnel during this time period; however, the effort should be measurable. In this regard, Federal, State and sponsor specific regulations should be reviewed.

DEFINITIONS:

Please refer to UM's ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: <http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf>

PROCEDURE:

UM personnel are to use [UM's ORA website](#) for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on [UM's ORA Contacts Webpage](#).