Title: No-Cost Extension Policy for Sponsored Programs

Effective Date: September 1, 2013

Supersedes: N/A

Issuing Authority: Sponsored Programs Administration

Responsible Officer: Assistant Vice President for Post-Award Administration

Policy

It is the policy of New York University ("University") that all costs proposed or incurred on a sponsored project must comply with sponsor terms and conditions, NYU policies and procedures, and applicable Federal, state and local regulations. The PI is ultimately responsible to ensure appropriate financial management and compliance with sponsor terms and conditions, including those associated with no-cost extensions.

Purpose of this Policy

The purpose of this policy is to assist Principal Investigators, schools, departments, units and personnel of the University to effectively manage the finances of sponsored program awards by providing guidelines and procedures for obtaining no-cost extensions.

Scope of this Policy

This Policy is applicable to all schools, departments, units and personnel of the University involved in administering sponsored awards.

Procedures for Implementation

Principal Investigators (PI’s) or their designees must obtain approval for a no-cost extension from the Office of Sponsored Programs (OSP). OSP will contact the sponsor for approval of the no-cost extension.

To initiate a one-time extension of the award expiration date of up to 12 months, the sponsor must be notified of the extension at least ten days prior to the original termination date. This extension may not be exercised merely for the purpose of using any unobligated balance.

Making a Request under the Prior Approval System (PAS)

- Internal prior approvals (including requests for no-cost extensions) will be made on a University PAS form. See instructions and form at: [http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf](http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf).
Approval for any changes must be received prior to implementing those changes. Generally, requests for approval of changes that have already occurred will not be reviewed and cannot be approved by the University.

The Office of Sponsored Programs Projects Officer must be consulted before submitting the PAS.

A no-cost extension must be approved in advance of the original date of project termination, to allow adequate time for sponsor notification under the terms and conditions of the award.

The signatures of the Principal Investigator, Department Chair/Designee, Dean/Designee and OSP are required to complete the PAS approval.

Principal Investigators should complete and sign the PAS forms before securing the signatures of the department chair and Dean or Dean’s designee. The request is then submitted to the Director of Office of Sponsored Programs for final approval.

Each request must include a detailed justification explaining the reason for a deviation from the original, approved budget and/or work plan.

Each request will be reviewed for appropriateness in relation to the objectives of the project and for compliance with the regulations, policies and procedures of both the University and the sponsor.

Once a PAS request has been approved, Sponsored Programs Administration will be notified, and the appropriate changes will be reflected in Budget Summary Report (BSR).

Principal Investigators should refer to specific terms and conditions from the sponsor that may be attached to the initial award letter or award notice for further details on budget restrictions and/or post-award changes.

Making a Request to the Awarding Sponsor

Those changes requiring approval from the sponsor should be described in a letter from the Principal Investigator to the appropriate sponsor official. The Director of Sponsored Programs in OSP will review each request. The letter must be approved/signed by both the PI and OSP Director. Once the letter has been approved, the Office of Sponsored Programs will then forward the request to the sponsor.

Policy Definitions

| No-Cost Extension | An extension of the date at which the project ends that does not involve additional funding. |
Related Policies

- **Charging Administrative Expenses to Federal Awards Policy**

- **Costing Policy**
  - [http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/costing-policy.html](http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/costing-policy.html)

- **Institutional Prior Approval System (PAS) for Management of Federal Grants**
  - [http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf](http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf)

- **Request for Prior Approval of Changes in Federal Grants**
  - [http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf](http://www.nyu.edu/content/dam/nyu/research/documents/OSP/pas99.pdf)

Federal Regulations

- **OMB Circular A-21**

- **OMB Circular A-110**
  - [http://www.whitehouse.gov/omb/circulars/a110/a110.html](http://www.whitehouse.gov/omb/circulars/a110/a110.html)