

# New York University

## UNIVERSITY POLICIES

<b>Title:</b>	No-Cost Extension Policy for Sponsored Programs
<b>Effective Date:</b>	December 1, 2017
<b>Supersedes:</b>	September 1, 2013
<b>Issuing Authority:</b>	Sponsored Programs Administration
<b>Responsible Officer:</b>	Assistant Vice President for Post-Award Administration

### **Policy**

It is the policy of New York University (NYU, “the 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 Principal Investigator (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 PIs, 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**

PIs 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 No-Cost Extension Request

Prior approval for post award changes on sponsored projects, including no-cost extensions, must be requested by the PI (or his or her designee) to the Office of Sponsored Programs. NYU has implemented a Prior Approval Matrix that will document whether prior approval is required from the sponsoring agency or whether NYU has approval authority for post award changes or actions. The Prior Approval Matrix contains all the information necessary to make this determination. The Prior Approval Matrix can be found on the OSP website at:

<https://wikis.nyu.edu/pages/viewpage.action?spaceKey=RES&title=Research+Terms+and+Conditions+Prior+Approval+Matrix>.

- The Prior Approval Matrix should be used for all federally funded awards
  - The Prior Approval Matrix identifies a wide range of possible actions, including no-cost extensions
  - For non-federally funded awards, OSP will follow the sponsor's specific requirements regarding actions requiring prior approval
- All requests for post award changes must be made in a timely manner. 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.
- All requests must provide sufficient justification and supporting documentation
- All requests must reference the CAYUSE award number to which the post award action applies
- When completed, the request should be emailed to [osp.agency@nyu.edu](mailto:osp.agency@nyu.edu).
  - The request should cc the PI, Department Chairperson, Department Administrator and the Dean or his/her designee
- The OSP Project Officer assigned to the award's unit will review the request and determine if any further information is needed. Upon completion, the Project Officer will submit the request to the sponsoring agency if necessary. If internal approval is appropriate, OSP will notify the sponsoring agency of the approved action.
- Those changes requiring approval from the awarding 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 the OSP Director. Once the letter has been approved, OSP will forward the request to the sponsor. In lieu of a signed letter, many agencies will now accept an email from OSP.
- The OSP Project Officer assigned to your unit will provide assistance and answer any questions regarding this procedure

## 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  
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/charging-administrative-expenses-to-federal-awards-policy.html>
- Costing Policy  
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/costing-policy.html>
- Research Terms and Conditions Prior Approval Matrix  
<https://wikis.nyu.edu/pages/viewpage.action?spaceKey=RES&title=Research+Terms+and+Conditions+Prior+Approval+Matrix>

## Federal Regulations

- OMB Uniform Guidance  
[http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)