No Cost Time Extension

Policies
UM Accounting Policy Manual: APM 60.52, Period of Availability

Forms
No Cost Time Extension Request

Overview
A No Cost Time Extension (NCTE) is an action to extend the period of availability without receiving an increase in funding from the sponsor. NCTEs are requested when a project cannot be completed within the original period of availability. OSPA may request a NCTE on behalf of a Principal Investigator (PI) for programmatic reasons; examples include time to ensure completion of the original project scope or to compensate for delays due to situations such as losing key personnel, locating graduate students, obtaining a fully-executed award document timely, producing equipment, or receiving supplies. Awards have varying conditions in order to request a NCTE. Therefore, all NCTE requests should be made as soon as the need is identified.

Note: A NCTE should not be requested solely to spend down remaining funds. Generally, final reports will not be submitted if a NCTE is requested.

Risk
If a NCTE is not granted, costs incurred past the end date are unallowable. If the NCTE is not requested in a timely manner, the request may be denied and unspent funds deobligated. A NCTE may also be denied if there is not adequate justification for the request.

Procedure
Principal Investigator (PI) – The PI determines that a NCTE is needed and then informs his/her Departmental Research Administrator (Department).

Timing: The PI/Department should notify OSPA that a NCTE is needed prior to the end date of the award. Many sponsors require a NCTE request 30 to 45 days prior to the expiration date of the award. However, each award may differ greatly. OSPA will submit the request in accordance with the sponsor- and award-specific requirements.

Note: Only OSPA should submit the official NCTE request to the sponsor as OSPA is the Authorized Official on behalf of the Board of Curators of the University of Missouri.

Department – When informed by the PI, the Department should assist the PI in notifying the OSPA Post-award Team using the No Cost Time Extension Request form.

OSPA Post-award Team – The OSPA Post-award Team reviews the NCTE request and asks for additional information if necessary. The OSPA Post-award Team confirms that all compliance certification approvals are active prior to processing the request, making updates to the certification panel in the PeopleSoft Grants Module and reminding the PI of renewal requirements as needed.
Note: Projects involving animals require review for Animal Care and Use Committee (ACUC) approval prior to account setup or expenditure of funds. Projects involving human subjects require review for Institutional Review Board (IRB) approval prior to account setup or expenditure of funds. Projects intended for NSF funding or funding subject to 42 CFR Part 50, Subpart F (PHS Revised Federal Regulation on Financial Conflict of Interest) require review for MU Conflict of Interest (COI) Office approval prior to account setup or expenditure of funds. See Related Topics below.

The OSPA Post-award Team then prepares the request for submission to the sponsor, using the sponsor’s specifications, and routes to the OSPA Compliance Team for University Authorized Signature.

OSPA Compliance Team – An Authorized Signer reviews, signs, and returns the NCTE request to the OSPA Post-award Team.

OSPA Post-award Team – The OSPA Post-award Team submits the request to the sponsor according to method specified in the sponsor requirements. Once approval is received or a fully-executed amendment is processed granting the NCTE, the OSPA Post-award Team updates the PeopleSoft Grants Module and then notifies the PI/Department by distributing a new Grant Award Summary electronically, including a copy of the amendment as applicable.

Responsibilities

Below is an outline of responsibilities as they relate to this procedure.

PI:

- Determines the need for a NCTE and submits NCTE form to OSPA in a timely manner.
- Provides programmatic justification for the NCTE request.
- Notes if there will be a significant change in the level of effort for key personnel (>25%), scope of work, deliverables, or budget.
- Ensures all certifications are in place to cover the new period of availability.
- Requests extension of subaward(s), if applicable.
- Bears responsibility for all programmatic and financial aspects of an award.

OSPA:

- Reviews, approves, and submits NCTE requests.
- If applicable, notifies COI Office through eCompliance of anticipated NCTE; awaits COI Office/COIC approval prior to issuing a revised Grant Award Summary.
- Reviews start and end dates of certifications to ensure they are active at the time of the NCTE request; notifies PI of renewal requirements, as needed.
- Processes subaward extension requests/amendments, as needed.
- Updates the PeopleSoft Grants Module and issues the revised Grant Award Summary.
COI Office (if applicable):

- Initiates COI review process upon notification of anticipated NCTE.
- Confirms that the Investigator Form and Scope of Work on file are complete and accurate for the anticipated continuation period.
- Notifies OSPA of COI Office/COIC approval.

Need Help?
If you have questions or comments about this procedure or the required form, contact OSPA at muresearchospa@missouri.edu or (573)-882-7560.

Related Topics
Animal Research and Animal Care and Use Committee (ACUC) Approval (in development)
Financial Conflict of Interest in NSF-Funded Research
Financial Conflict of Interest under the 2011 Revised PHS Regulation
Human Subjects Research and Institutional Review Board (IRB) Approval (in development)

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