Procedures for requesting extensions of time on a sponsored project

Overview

This is a guide for Principal Investigators (PIs) and Departmental Research Administrators (DRAs) when submitting a request for either an At-Risk Extension or a No-Cost Extension (NCE) for a sponsored project or award. These requests are intended to bridge a time gap between the currently authorized end date of an award and the receipt of the official award action from the sponsor. Extension requests should be submitted only after the department has accepted the risk that additional funding and/or time may not be approved by the sponsor. In such a situation, any costs incurred during the extended time are the financial responsibility of the department. Refer to the Fiscal Management of Sponsored Projects Policy and the U.S. Office of Management and Budget’s Uniform Guidance (2 CFR 200).

The Campus Controller’s Office (CCO) and the Office of Contracts and Grants (OCG) can answer questions on this process.

Definitions

At-Risk Extension Request

- This type of extension may be requested during the life of an award when a PI anticipates a sponsor will provide official documentation of a new end date, with or without additional funding. This is a CU Boulder action only and does not involve a request sent to the external sponsor.
- Examples include CU as sub recipient, contracts with options, etc.
- This form is mandatory.

No-Cost Extension Request (NCE)

- This type of request extends the project period beyond the original project end date. As the phrase “no cost” suggests, there is no additional funding. Upon receipt of this request, three conditions must be met before a NCE will be considered:
  - 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
- This form is mandatory.
Period of Performance (PoP)

- **Authorized** – timeframe in which we are able to bill, invoice, draw, recognize revenue. This is the contractual period of performance for awards that are not incrementally “timed.”
- **Anticipated** – period of performance for awards in which we receive incrementally “authorized subsets of time.”
Procedure

At-Risk Extension Request Process

Step 1: Award Review – As an award end date approaches, the PI/DRA begins to proactively review their awards to determine if an At-Risk extension should be requested. CCO sends notifications at 90, 60, and 30 days prior to the award end date to serve as a reminder of awards that may be ending.

Step 2: At-Risk Extension Request – If it is determined the award will be ongoing, the PI/DRA submits the extension form. This is a mandatory form. Each department should determine who is responsible for submitting the extension form. The At-Risk Extension requires a departmental guarantee SpeedType and an authorized person to allow the use of that SpeedType in the event the extension is disallowed by the sponsor.

Step 3: Form routing/notification – The form will automatically route to CCO, with copies to the requestor and departmental guarantee approver.

Step 4: Award provisionally extended – CCO reviews and processes the At-Risk Extension Request and adjusts the project end date in PeopleSoft. This *is an internal extension and should not be interpreted as authorization by the sponsor.*

Step 5: Monitoring – CCO monitors the award until sponsor approved documentation is received. Monitoring is in conjunction with OCG and the department.
Step 6: **Receipt of sponsor-approved modification** – OCG will receive and process the sponsor-approved modification in *infoEd*, then route to CCO.

Step 7: **Award is officially extended** – CCO updates the award date and related dates in PeopleSoft. This triggers a system email notification to the PI and Fiscal Manager of the changes.

**What happens after an At-Risk Extension is granted by CCO?**

- The 90-60-30-day notifications will continue until the formal sponsor authorization (mod) is processed, or the end date passes, whichever comes first. These notifications are triggered by the Award end date in PeopleSoft and serve as a reminder that an extension is still provisional.
- The system will not prohibit spending, however any funds spent during the at-risk extension timeframe will be department’s financial responsibility if the award is not extended or funded by the sponsor.

**What happens if an At-Risk Extension is not approved by CCO?**

- The PI may spend using other departmental resources and transfer expenditures upon receiving formal authorization from the sponsor.
- CCO’s decision is based on risk criteria and you can contact CCO to discuss why the extension was not approved.
Step 1: **Award Review** – The PI/DRA receives the 90-60-30-day end date notifications and reviews those awards to determine if a No-Cost Extension (NCE) Request needs to be sent to the external sponsor.

Step 2: **No-Cost Extension Request** – The PI or DRA submits the NCE form. Effective 10/1/18, this is a mandatory form when submitting an NCE.

Step 3: **Form routing/notification** – OCG and CCO simultaneously receive the extension request, and a confirmation is sent to the form’s requestor.

Step 4: **Award is reviewed and provisionally extended** – OCG processes the paperwork to submit the extension request to the sponsor. At the same time, CCO reviews the request for consideration and adjusts the project date in PeopleSoft.

Step 5: **Monitoring** – CCO monitors the award until the sponsor-approved extension is received.

Step 6: **Receipt of sponsor-approved modification** – OCG will receive and process the sponsor-approved modification in *infoEd*, then route to CCO.

Step 7: **Award is officially extended** – CCO updates the award date and related dates in PeopleSoft. This triggers a system email notification to the PI and Fiscal Manager of the changes.