

# Effort Commitments during No-Cost extension periods

## June 1, 2007

### Introduction:

It is not unusual for a PI to need a no-cost time extension to complete the work on a project or gather the data and prepare the final report, etc. When this situation arises and a no-cost extension is granted the requirement for faculty effort during the extension period is oftentimes overlooked.

This document explains the processes and procedures the university is following to support compliance with federal requirements dealing with faculty effort during a no-cost time extension period.

### Background:

In a question and answer session with Joe Ellis, Acting Director, NIH, Office for Policy on Extramural Research, the following question was posed.

#### “Scenario C

*A Principal Investigator was awarded at 10% effort on his/her NIH grant. The grant period is coming to an end and the institution is approving a 12-month no-cost extension under Expanded Authorities. The PI plans to complete the study and prepare the Final Report during the no-cost extension period. During the no-cost extension period the PI will devote “As Needed” effort.*

*Question: Does the original 10% effort commitment extend to the no-cost extension period? Does the PI need to request permission to reduce his/her effort? Or, does the institution have the authority to approve the reduction of effort when approving the no-cost extension?”*

*Answer: From a strict policy standpoint, the terms and conditions continue unless amended, so one could argue that the 10% commitment stands. In the real world it is acknowledged that effort commitments during no-cost-extensions when funding and other resources are limited may vary. There may be advantages to documenting reduced effort commitments, and the negotiation of overlap is a prime example.*

*K awards present a particular case as they generally carry the requirement for a 75% commitment of total professional effort. Again this is a case when communication to the IC on the change will be very useful. Even if a response is received that approval is not required, it will clearly provide the authority to take the actions required.*

This same question was posed recently to NIH and NSF officials at the regional National Council of University Research Administrators (NCURA) conference. Both officials reiterated that the commitments contained in the original proposal or any approved changes during the award period remain in effect during the no-cost extension period.

The NIH Grants Policy Statement (GPS) states, "Grantees are reminded that all terms and conditions of the award apply during the extended period." The GPS also states; "The grantee is required to notify the GMO in writing if the PI or key personnel specifically named in the NGA will withdraw from the project entirely, be absent from the project during any continuous period of 3 months or more, or reduce time devoted to the project by 25 percent or more from the level that was approved at the time of award. NIH must approve any alternate arrangement proposed by the grantee, including any replacement of the PI or key personnel named in the NGA."

**Process:**

The Office of Sponsored Programs has modified the no-cost extension request form to address this area. Two questions have been added to the process. They are:

10. Will the effort of any key personnel be reduced during this no-cost extension period?

Yes  No

If yes, please identify those whose effort will be reduced and the proposed new level of effort. (Note: A reduction of 25% or more of the originally proposed effort may require prior approval from the sponsor.)

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This question addresses both paid and cost shared effort. A reduction in effort by the PI or other key persons named in the award will normally require sponsor approval. If the "yes" box is checked OSP will determine if sponsor approval is required and work with the department to notify the sponsor and request approval as appropriate. (NOTE: it is expected that some measurable level of effort will be directed towards the project during the no-cost extension period, paid by the award or cost shared.)

11. Will the effort commitments included in the original proposal and not paid by the award continue during this no-cost extension period?

Yes  No

If yes, please have a GC-1 Addendum for this cost sharing available for submission upon request from OSP.

This question addresses the cost share associated with committed effort that is not paid through the award. If the original proposal contained a commitment of effort that is to be cost shared that commitment is expected to continue through the no-cost extension period.

In order to record the commitment in the budget driver so that it is reflected on the faculty effort report (FEC), a GC1 addendum is needed.

If the answer to this question is no the effort commitment will not continue, refer to question 10. If the commitment is continuing at the original level or being reduced but not eliminated a GC1 addendum is needed to record the new cost share commitment.

**Procedure:**

Departments submit a request to OSP for a no cost extension on the form from the OSP web site. (<http://www.washington.edu/research/osp/nocost.php>)

If effort funded by the university (i.e. cost shared) will continue during the no-cost extension period, a GC1 addendum for the extension period is submitted to OSP along with the request for a no cost extension.

If approved, OSP will notify the sponsor of the approved no-cost extension and submit a Notice to Establish Account (NEA) with the revised end date to GCA along with the GC1 Addendum, if applicable.

GCA will update the end date of the budget and enter the cost share from the GC1 Addendum into the Budget Driver. The new cost share will then be reflected in the FECs. After the budget is updated, a copy of the NEA is sent to the department.