



PROCEDURE TITLE:

No-Cost Extension for Sponsored Awards

APPLIES TO:

All principal investigators (PIs) and departmental staff managing externally sponsored projects

ADMINISTRATIVE AUTHORITY:

Office of Research & Innovation

Sponsored Programs

Office of the Provost and Vice President of Academic & Student Affairs

APPROVED BY:

President Koffi C. Akakpo

EFFECTIVE DATE:

June 23, 2025

NEXT REVIEW DATE:

June 23, 2027

PROCEDURE STATEMENT:

This procedure outlines the process for requesting a no-cost extension (NCE) for an externally sponsored project. An NCE extends the project's end date, allowing for the completion of the original scope of work using unexpended funds, without requesting additional funding from the sponsor. All NCE requests must be submitted to the sponsoring agency by KSU's authorized organizational representative (AOR) and require institutional review and approval prior to submission.

DEFINITIONS:

Authorized Organizational Representative (AOR)

A designated official in the Office of Research & Innovation (ORI) who has the legal authority to act on behalf of KSU in matters related to sponsored projects.

No-Cost Extension (NCE)

An extension of the period of performance of a sponsored award beyond the original expiration date to allow for the completion of the approved project scope, without requesting additional funds from the sponsors.

Principal Investigator (PI)

The individual with primary responsibility for the design, execution, and management of a sponsored project.

PROCESS:

1. Justification for a No-Cost Extension

A request for an NCE must be based on a clear, project-related need. The PI must provide a scientific or programmatic justification for the extension.

- **Valid Justifications:** Valid reasons for an NCE include, but are not limited to, delays in hiring personnel, unforeseen delays in acquiring equipment or supplies, or other unanticipated circumstances that have delayed the completion of the original project objectives.
- **Invalid Justification:** An NCE may not be requested for the sole purpose of expending an unobligated balance of funds.

2. Submission Timeline

To ensure adequate time for institutional review and sponsor consideration, the PI must submit a complete NCE request to the Office of Research & Innovation (ORI) at least forty-five (45) days prior to the project's current end date. Requests submitted with less than 45 days remaining will be reviewed on a case-by-case basis and may not be approved for submission if there is insufficient time for sponsor review.

3. Required Documentation

The PI is responsible for preparing and submitting the following documents to ORI:

- A formal NCE request letter or the sponsor's required form.
- A clear justification explaining the need for the extension and how the remaining work will be completed within the extended timeframe.
- An estimate of the remaining funds and a brief plan for their use during the extension period.
- The requested new end date.

4. Institutional Review and Submission

- ORI will review the NCE request to ensure the justification is sound, sufficient funds remain, and the request complies with sponsor and institutional policies.
- Once the request is finalized, ORI will route it for any required internal signatures.
- The AOR in ORI will officially submit the approved request to the sponsoring agency. ORI will manage all communications with the sponsor regarding the request.

Responsibilities

- **Principal Investigator (PI):** Responsible for monitoring project progress, identifying the need for an NCE in a timely manner, preparing the required documentation and justification, and submitting the request to ORI by the internal deadline.
- **Office of Research & Innovation (ORI):** Responsible for reviewing NCE requests for compliance, providing guidance to PIs, obtaining institutional approvals, and officially submitting the request to the sponsor. ORI is also responsible for updating KSU records upon receipt of sponsor approval.

REFERENCES AND RELATED MATERIALS:

- Uniform Guidance, 2 CFR § 200.308, “Revision of budget and program plans”
- KSU Budget Modifications Procedure

CONTACTS:

| Subject | Office | Telephone | E-mail |
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HISTORY:

| Revision Type | Date of Issuance/Revision | Drafter(s)/Editor(s) |
|------------------------|---------------------------|-------------------------------|
| Issued (New Procedure) | June 2025 | Dorothy Daley and Zach Atwell |
