



# EFFORT COMMITMENTS DURING NO-COST EXTENSIONS

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## Overview

After a thorough analysis of sponsor policies and Federal regulations, it has been concluded that a no cost extension (NCE) simply provides additional time during which the originally proposed effort can be expended, therefore, Sponsored Project Administration (SPA) and Financial & Cost Accounting (FCAS) will no longer require that effort commitments be updated when requesting or receiving a no cost extension, except for grant programs that have a specific minimum effort requirement that must be maintained during the no cost extension period (e.g., NIH K type awards).

## Discussion

The release of the Uniform Guidance (2 CFR 200) in December 2013, and the subsequent issuance of agency specific terms and conditions compliant with 2 CFR 200, provided an opportunity for the University of Vermont to review its effort policies and procedures. SPA and FCAS have carefully assessed the Uniform Guidance and agencies' terms and conditions and determined that adjusting our institutional process for tracking effort commitments during a no cost extension period is acceptable and appropriate.

In October 2015, the National Institutes of Health published a Notice ([NOT OD 16 017](#)) announcing significant changes to the Grants Policy Statement for FY 2016. One such change



was that the NIH no longer requires prior approval to reduce effort during a no cost extension (NCE).

Another policy document taken into consideration during the review of effort policies and procedures is guidance from the National Science Foundation on the level of commitment required during a no cost extension period. In the [Frequently Asked Questions on NSF's Revised Cost Sharing Policy, Updated January 2013](#), the NSF clarified the effort commitment required during a no cost extension:

