No Cost Extensions Routing, Submission and Updates

Starting December 2010, No Cost Extension requests will be routed and managed using WISPER. Under this new process, RSP pre-award will review and submit all requests for extensions to all agencies. In addition, RSP pre-award will update all of the PeopleSoft fields on the project, award, and SFS extensions. RSP post-award will update the PeopleSoft contract.

1. Request for all no cost extensions are to be routed via WISPER
   a. The request should include all information as outlined at http://www.rsp.wisc.edu/awardmgt/nocost.html
   b. In the WISPER record
      i. Please be certain to indicate the document type as NO COST EXTENSION “NoCostExt”
      ii. General information page should be completed.
         1. Budget details can remain blank
         2. Outgoing subaward question must be answered
         3. Deadline for submission of the request to the Sponsor & the method entered in the Submission Instructions section
         4. Compliance answers responded to and compliance details including protocol number and dates should be completed.
      iii. Project details including proposed commitments for all Key Personnel during the extension period and related cost sharing sources if applicable should be completed.
         1. The PI must have a commitment during the extension period
         2. This should match the information provided in the no cost extension request letter or justification communicated to the Sponsor.
   c. The Request
      i. A template request letter is located on the RSP website at: http://www.rsp.wisc.edu/forms/nceletter.doc and should be used as the basis for all requests requiring approval.
      ii. Should be attached in the WISPER attachment section
      iii. Recommended language for inclusion in the letter to indicate only the minimal amount of effort will be guaranteed during the extension period: “The Key Personnel have met or are in the process of meeting their effort commitments to this project. Upon satisfying those obligations, the commitment will be reduced to the minimum required 1% for the Principal Investigator and 0% for all other key personnel. “
   d. RSP recommends searching the existing commitment inquiry in WISPER to confirm that the appropriate current commitment is being used as a baseline for adjustments during the extension period.
   e. By choosing the “VALIDATE TO REQ PROJECT/AWARD FINALIZED OF SPO,” any potential commitment overlap will be identified as an error. Such errors should be addressed by reducing effort in the extension period or sending through a commitment update form for other overlapping projects as an additional attachment on this WISPER record.
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f. Each Division will determine whether PI signature is required and whether any additional departmental approvals are required before submitting to RSP.
   i. Division will override signatures using DIVISION ACTION tab if determined to meet Division Guidelines
   ii. RSP will simply require that the WISPER record be “SUBMITTED TO SPO”. If the Division does such, RSP will not require additional approvals or signatures.

g. After SUBMITTED to SPO, all WISPER records will be assigned to Charlie Giese in status 3 for team assignment.

2. Prior to submission of the notification or request, RSP will review the request and award to:
   a. Ensure positive award balance anticipated as of current award end date.
   b. Ensure the amount indicated as the award balance as of award end date actually matches WISDM’s projected balance.
   c. Ensure commitments are appropriate during the extension period and that the Key Personnel have the ability to meet this commitment. Ensure anticipated budget balance as of award end date can cover commitments as detailed in the request using the salary encumbrance tools.
   d. If there is mandatory cost sharing, determine if that financial obligation has been met before confirming the level of effort and commitment offered. If the mandatory cost sharing obligation has been met, cost sharing for non-key personnel should not be extended.
   e. If the commitment is acceptable, submit the extension request.
      i. For Federal awards, determine if it is a notification or request
         1. If award is under FDP or the Research Terms & Conditions and this is the first extension, follow e.i.i. notifications. (Except DOD which requires approval for all extensions)
         2. If award is under FDP or Research Terms & Conditions and this is the second extension OR the award is not under FDP, follow e.iii. request.
      ii. For Federal Award (except DOD) Notifications – If the intent is to reduce the level of effort from Key Personnel listed on the Notice of Award by more than 25% during the extension period, there must be prior approval from the Grants Management Specialist of such a reduction at the time of the notification. Standard text to include in such communication will be provided to RSP staff to ensure that a negative approval is needed. This should increase the efficiency of the process.
      iii. For Federal Award (except DOD) Requests – If the intent is to reduce Key Personnel effort, this information should be included in the request letter attached in WISPER.
      iv. Non-Federal and DOD Awards: Since there are no unilateral extensions for these awards, either explicit reduction of the unmet commitment or inclusion of the language under 1.a.1 above to reduce the overall level of commitment and
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institutional cost share required should be included in the letter requesting the extension.

NOTE to RSP Staff: Question the items listed above (lack of reduction in commitments, over commitments or lack of budget to cover commitments) before submission but NEVER miss a deadline for lack of update. Instead include information that we expect a reduction in effort during the extension period and follow up later.

3. Submit request
   a. NSF – FastLane
      i. NSF notifications and requests are submitted in FastLane. The PI may initiate but a WISPER record is still required. In FastLane, changes in commitments should be reflected in the time extension justification text box.
   b. NASA
      i. Enter NCE details on web site
         https://www.nssc.nasa.gov/Procurement/NCE.cfm both for first time FDP extension notification and to request second extensions. Include PI letter in the attachments.
      ii. STSCI – Space Telescope Science Institute requests are submitted electronically through the STGMS system. The justification for changes in commitments should be included in this system request.
   c. DHHS Agencies
      i. HRSA: The Electronic Handbook (EHB) electronic system is used to request extensions. The UW has three different organization codes and multiple profiles. The profile particular to the award must be used to submit the extension. Crystal Gaston is an excellent contact.
      ii. AHRQ: Letter to GMS. No electronic system.
      iii. NIH – Commons
         1. First request is notification. If commitments change by greater than 25%, a written letter of request (negative approval language to be included) must be sent to the Grants Management Officer per e.ii. above with copy to the Program Officer.
         2. Second request is a request. If changes in commitments, that information should be included in the written letter of request and is assumed approved when the extension is approved.
         3. T32 - When requesting an extension of a T32 the award will only be extended through the month of the last trainee’s appointment end dates, not necessarily a whole year. If there are no active trainees there is no need for an extension, and the award will not be extended. Upon receipt of the NCE request RSP personnel will verify the trainee appointment dates via xTrain in Commons, and adjust the request dates accordingly.
            a. Example: Current end date of 5/31/2011. Request for extension is routed to RSP via WISPER. RSP verifies via xTrain the
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appointment ends dates for all current trainees. The last trainee’s end date is 2/18/2012; RSP will adjust the requested end date to 2/29/2012.

d. NOAA

i. If 15 CFR 14.25 (2) applies, prior approval for a one-time extension of up to 12 months is waived. It is still required to notify the Program Officer in writing (email) of the extension and the supporting reason. Sending the PO the PI’s request letter suffices and be sure to disclose that the UW is extending the award dates in Grants Online.

ii. In Grants Online, search for the award and “Create an award action request”. Select either the “prior approval waived” or the “requires approval” no-cost version depending on the terms. Enter the justification and attached the PI’s request letter and snapshot of the remaining balance in WISDM. Click “Save and start workflow” and then submit the “Forward to agency” action. If prior approval is waived, a link to a PDF of the award action face page is immediately available for processing.

e. DOD Agencies - All of the DOD agencies require agency approval for the initial no cost request. A letter must be submitted to the Grant Management Specialist as any non-FDP award would require.

f. OTHER SYSTEMS OR AGENCY SPECIFIC PROCESSES – Preaward will engage postaward in identifying those systems and processes as quickly as possible.

g. All other requests should be submitted per the award notice through email or hard copy letter as required. Information on the content of the letter and a template is available at: http://www.rsp.wisc.edu/awardsmgmt/nocost.html

h. A copy of the request should be loaded into the WISPER attachments section.

4. Updating SFS

a. If the request is a notification and no Sponsor approval is required the WISPER record will enter directly from status 3 into status 5. See step 5. If the request is an approval, the requestor will retain the WISPER record in a status 4.5 negotiation to track the return approval of the Sponsor. When the Sponsor approves, the record enters into status 5.

b. Once extension is approved (or once notification submitted)

i. Review per the compliance guidance documents. Use the WISPER Project Setup Approval to gather any missing information.
   1. IRB
   2. IACUC
   3. Biosafety
   4. Stem Cells
   5. Effort Commitments met
   6. OAR submitted
   7. (PHS agencies) Start FCOI review process after all key persons entered on projects tab. Once completed submit necessary reports to sponsor.
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8. Effort over-commitments
9. Cost share is appropriate to salary type and source

ii. Update commitments in SFS extensions per the information confirmed in the WISPER project details. If cost sharing, confirm the source provided is available and then update the SFS Extensions detail appropriately.

iii. Update protocol information on Award certifications page

iv. Extend end dates
   1. Project end date on Award funding page
   2. KK dates
   3. Project team dates
   4. Award dates on Award Modification page

v. Upload appropriate notification or approval to the Project Attachments

vi. Perform award modification using Award Modification type No Cost Extension

vii. Close out the pending WISPER record including the Award ID

viii. Provide file and award summary the next day to the accountant for updating the contract, invoicing, etc.

5. Provisional Extensions

   a. After submission of a no cost extension request, should there be a wait for Sponsor response; RSP will assume the Sponsor will ultimately approve the request. Upon submission of the extension request, RSP will update the UW-Madison accounting system to allow expenses to continue to post. The actual project and award end dates, as well as the commitment information, will be updated upon Sponsor approval of the extension request.

   b. When for any reason a request letter cannot be prepared before the PI, department and Dean’s office desire to extend the end date, a provisional extension request may be submitted.

      i. Create the WISPER record per item 1 above
      ii. The Division should “REQUEST ADVANCE ACCOUNT OF SPO” rather than “SUBMIT TO SPO.” This indicates that the Division has not completed the process and the request letter is not yet ready.
         1. Based on this “ADVANCE” division request, RSP will update the accounting system to allow expenditures to post
         2. RSP will notify campus of this completion by sending a PROVISIONAL EXTENSION Award Email.
      iii. The NCE request will remain in status 4 – Sent to Sponsor until step iv.
      iv. When the request letter is prepared, the Division should attach the request and send an approval to Kurt McMillen at RSP for assignment to review and submit in accordance with steps 2 & 3 above.
      v. RSP will then update the WISPER record to status 4.5 indicating submission of the No Cost Extension request and complete processing per steps 3 & 4 above.