Responding to the requirements and guidelines associated with proposal submission for ARRA funds has been an on-going learning experience for everyone. Over the last two weeks numerous faculty members have been instructed by their NIH program officers to request no cost extensions (NCE) for their current research awards in order to position themselves appropriately to apply for either ARRA administrative supplements or competing revisions.

NIH allows for electronic notification of the first 12 month NCE or request for an additional 12 month NCE via eRA Commons. This feature becomes available 90 days prior to the end of the grant’s competitive segment. Those faculty members whose grants were not due to end in the next 90 days were unable to utilize Commons to make this request. ORS responded by drafting a letter of request and sending it directly to the NIH grants officer, explaining the need to make the request outside of Commons. Based on ORS submitting these letters, we have received a wide variety of responses back from NIH grants officials. They include one approval of the NCE request, several rejections with instructions to wait until the option is available in Commons (90 days prior to the end of the segment), and a few requests for detailed justifications. On April 6, NIH published guidance on exactly how no cost extensions play into the requests for administrative supplements and competitive revisions. This guidance can be found in a Q&A format at [http://grants.nih.gov/recovery/faqs_recovery.html](http://grants.nih.gov/recovery/faqs_recovery.html).

**Please note: NIH will only accept NCE requests made through eRA Commons. That means that faculty cannot request NCE’s earlier than 90 days before the end of the current competitive segment. NIH will not accept letters from ORS requesting early approval of a no cost extension request.**

There are key differences between the competitive revision funding mechanism and the administrative supplement mechanism regarding the no cost extension period.

Competitive revision applications, formerly termed competitive supplements, are to support a significant expansion of the scope or research protocol of approved and funded projects. Competitive revision applications must propose the same end date as the current project period. To be eligible, the parent grant must be active at the time the revision application is submitted, and the research proposed in the revision must be accomplished within the current competitive segment. That is, the period of support requested for the revision cannot exceed the current project period end date of the parent grant, including projects on a no-cost extension. Also, a no-cost extension must be in place before the revision application is submitted. If what is being proposed extends beyond the end date of the current project period, NIH guidance suggests that “perhaps a competitive revision
is not the best solution. “A PI should consider a traditional renewal application or perhaps one of the unique ARRA opportunities like the Challenge grant. And ARRA administrative supplement might also be an appropriate choice. **There is no option to submit an application for a competitive revision and propose that it extend into a no cost extension period that would be requested and established at some future date.**

Administrative supplements are for the purpose of accelerating the tempo of scientific research on active grants. Award periods for administrative supplements must be consistent with the time that is remaining on the original grant, not to exceed 24 months. Not all administrative supplements will be awarded for a full two years. If a project is close to the end of its project period (well into the last year of the competitive segment), the PI may indicate in the application for an administrative supplement that he will be exercising his option for a 12 month NCE or will be requesting a 12 month NCE from NIH (whichever is appropriate to the terms of the grant award) and therefore, the administrative supplement performance period would include that extension period (up to a maximum of 24 months). **There still is no option, however, to request early approval for a no cost extension.** This would be done in Commons in the customary way 90 days prior to the end of the original grant’s project period.

If you have questions regarding this guidance, please check the NIH FAQ’s at [http://grants.nih.gov/recovery/faqs_recovery.html](http://grants.nih.gov/recovery/faqs_recovery.html), which discusses specific situations and how they should be handled. If you still have questions, call your ORS pre-award contact person or contact Office of Research Support Services if you are with a department in the School of Medicine. Please remember that all proposals are due to ORS in complete and final form three business days prior to the application due date. Again I thank you for working with us to make sure we meet the requirements and follow the guidelines established for these ARRA programs.

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