Prior Approvals: No Cost Extension, Carry Forward, and Relinquishment
What is a Prior Approval?
The NIH Definition

Written approval by an authorized HHS official, e.g., a designated IC GMO, evidencing prior consent before a recipient undertakes certain activities or incurs specific costs
Examples of activities that require Prior Approval:

1. Change in PD/PI or senior/key personnel named in the NOA
2. First NCE
3. Additional no-cost extension, extension greater than 12 months, or late notification of initial no-cost extension
4. Carryforward of unobligated balances
5. Change of Grantee Organization – Transferring a grant out to new institution – Relinquishing a grant
No Cost Extensions (first request) - NIH

- Not technically a prior approval as the approver is the Institution not the sponsor
- **Request can be made as early as 90 days prior to the project end date and as late as 10 days prior to the project end date**
- **Request must come from the PI**
  - Full grant number
  - Routing number
  - Length of extension (1-12 months)
  - Brief justification
- OGC PostAward reviews/approves
- AOR submits approval via the Commons
PI sends NCE request info to xenia@ucdenver.edu

NCE request is sent to OGC Postaward for review

OGC Postaward approves

YES

PI or Dept Admin revises NCE request

NO

AOR submits approval of NCE via the Commons

NIH sends confirmation email with new project end date to AOR and PI

Confirmation email is forwarded to award Setups

New project end date is reflected in eRA Commons

Award Setups extends project period

NIH First NCE
Additional no-cost extension, extension greater than 12 months, or late notification of initial no-cost extension - NIH

• Formal request
  • Budget for the unobligated balance on PHS 398 form set
  • Budget justification on PHS 398 form set
  • Checklist PHS 398 form set

• PI sends documents to the xenia email box

• OGC PreAward processes

• OGC PostAward reviews and approves

• OGC PreAward reviews, signs, and sends email to NIH
Carryforward - NIH

• Formal request
  • Budget for the unobligated balance on PHS 398 form set
  • Budget justification on PHS 398 form set
  • Checklist PHS 398 form set

• PI sends documents to the xenia email box

• OGC PreAward processes

• OGC PostAward reviews and approves

• OGC PreAward reviews, signs, and sends email to NIH
PI or Dept Admin creates request documents

PI or Dept Admin sends request documents to xenia@ucdenver.edu

request is sent to OGC Postaward for review of financials

OGC Postaward Approves

YES

AOR reviews request documents

AOR Approves request documents

NO

PI or Dept Admin revises applicable request documents

Sponsor approves request

Sponsor approves request

AOR submits request to sponsor

Requested UOB is added to current budget year for CF; Email approval for additional NCE

YES

AOR Approves request documents

NO

Sponsor reviews request

Sponsor reviews request

YES

CARRY FORWARD and Additional/Late NCE REQUEST
NIH - Change of Grantee Organization – Relinquishing a Grant

1. UCD has a formal, internal approval process
2. Please notify OGC as soon as possible when you know a PI will be leaving UCD
Process for Relinquishing a Grant

• Starts with the PI/Department
• PI receives Prior Approval from PO/GMS/NIH to transfer the grant out
• Internal transfer approval form is completed by PI/Department
• PI/Department works with OGC PostAward to determine transfer amount
  • Transfer amount cannot exceed the current year’s award
  • Transfer amount must be provided to OGC PreAward (direct, indirect, total cost) by department and approved by OGC PostAward
• PI/Department sends information regarding the new institution to the xenia email box:
  • Official Name
  • DUNS Number
  • IPF Code
  • Contact email at the institution
  • Requested Termination Date
  • Will there be equipment costing $5,000 or more to transfer? If so, please provide list.
• AOR approves, generates, and submits the Relinquishing Statement (DHHS PHS3734) via eRA Commons.
Take-away:

• Refer to the NOA and the sponsor’s standard terms and conditions first and foremost to determine whether a Prior Approval is needed and to find out what the sponsor’s requirements are for requesting a Prior Approval
• Not all sponsors will require institutional approval
• All NIH Prior Approval requests must be submitted by the AOR
• Request first NCE (NIH) prior to the project end date
• Previous year’s FFR must be approved by the NIH before a CF can be requested for the current year
• Please notify OGC PreAward immediately when you know a PI will be leaving UCD
Questions – OGC PreAward

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