

Prior Approvals: No Cost  
Extension, Carry Forward, and  
Relinquishment

What is a Prior Approval?

# The NIH Definition

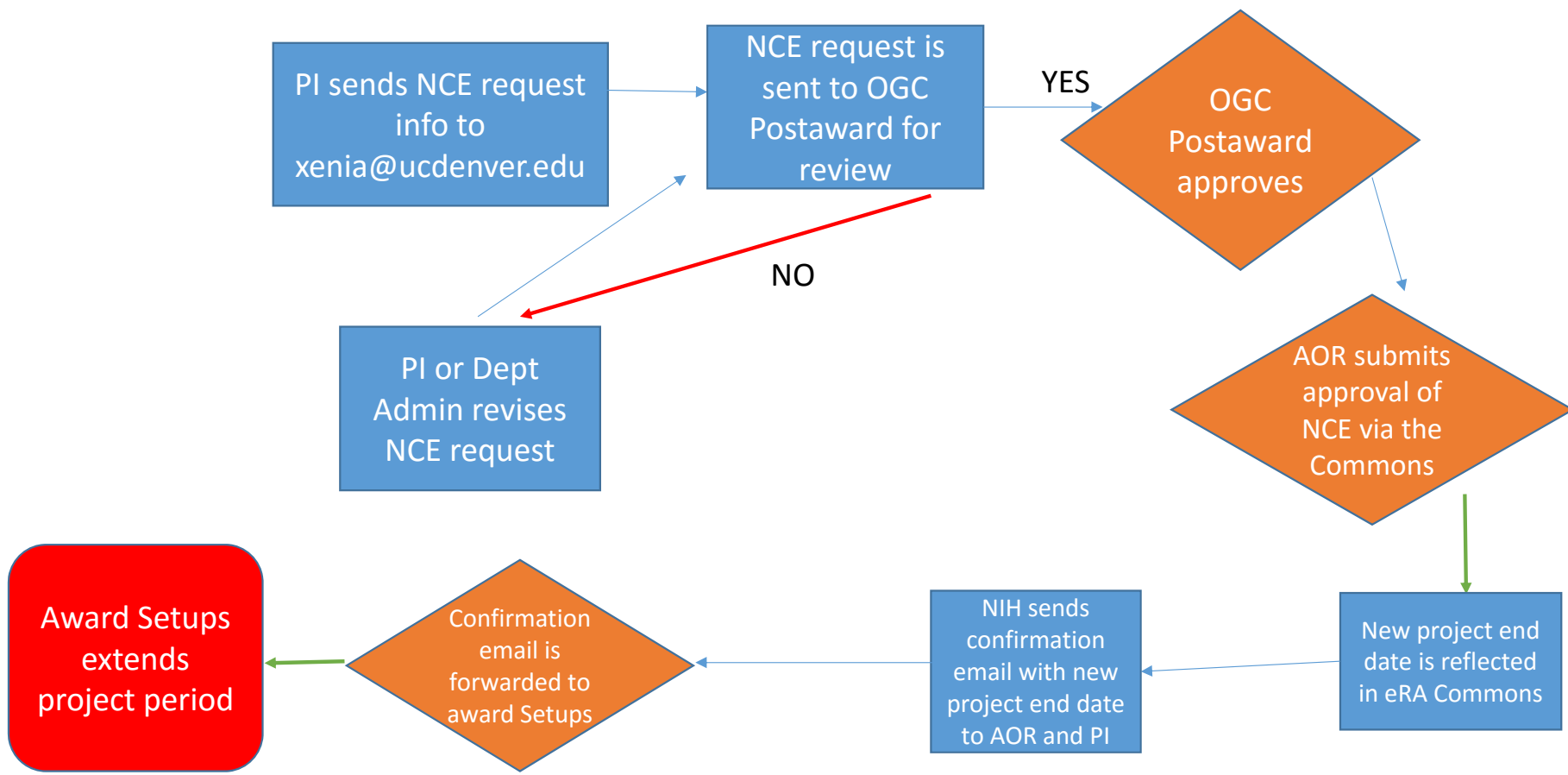
Written approval by an authorized HHS official, e.g., a designated IC  
GMO, evidencing prior consent before a recipient undertakes certain  
activities or incurs specific costs

# 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



**NIH First NCE**

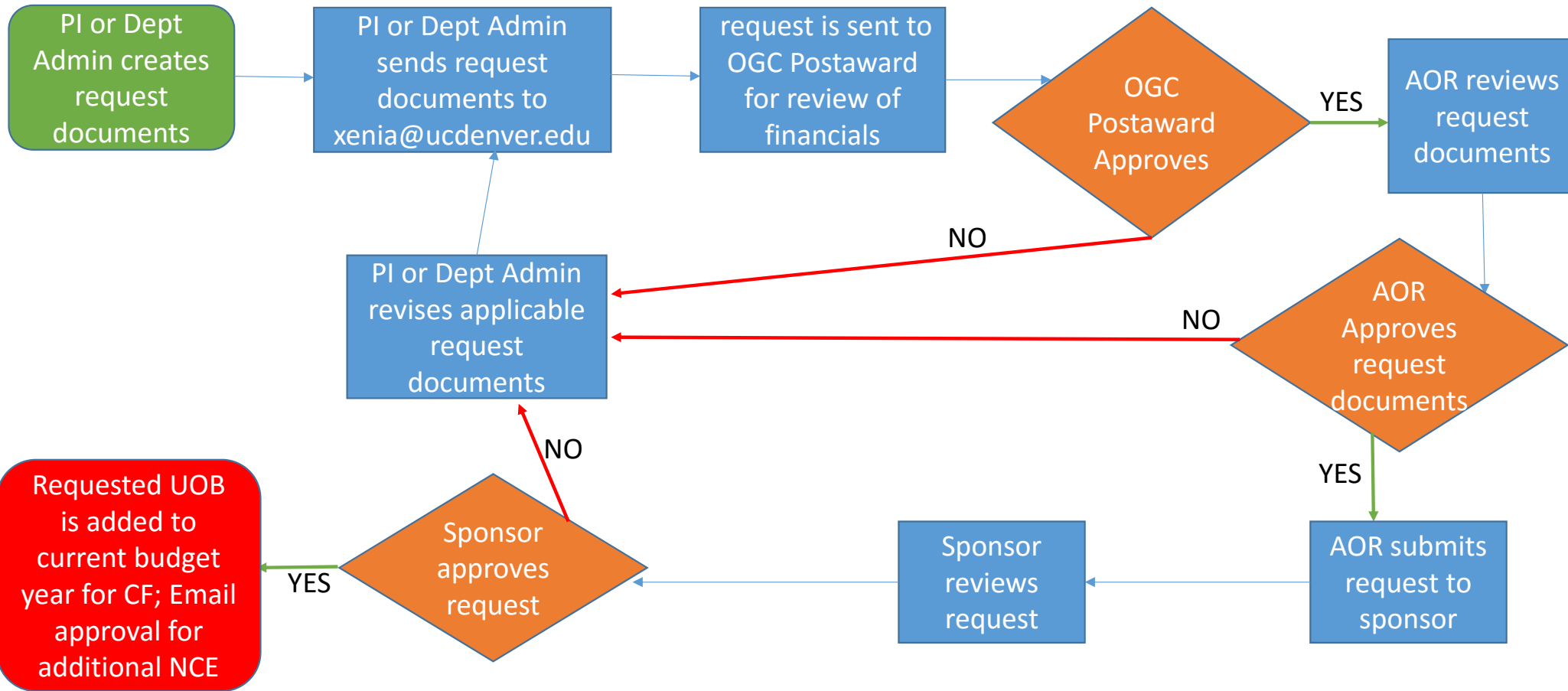
Additional no-cost extension, extension greater than 12 months, or late notification of initial no-cost extension - NIH

- 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





## 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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