

# HRB Policy on No-Cost Extensions

## Version 4.0

*Effective from 1 January 2025*

### Purpose

This policy provides details on those instances where the HRB may authorise an extension to the duration of the Term of a Grant within the funds already made available in the Grant Agreement. It also sets out the procedures and timelines for requesting a no-cost extension (NCE).

### Policy

1. The HRB may authorise requests to extend the duration of the Term of an active HRB Grant within the funds already made available in the Grant Agreement for a maximum period of 12 months beyond the End Date where it is warranted and justified. This includes the following:
  - Delays in receiving ethical or regulatory approvals.
  - Patient/participant recruitment delays.
  - Staff, including PhD candidates, recruitment delays (where multiple key posts are not all activated at the same time), or gaps occur during the grant (for example a postdoctoral fellow leaving).
  - Achievement of objectives not yet achieved but funding remaining.
  - To facilitate open access publications from the grant activities.
  - To facilitate completion of dissemination activities included in the original Grant Agreement.
  - Facilities being shut down/refurbished or other changes at research sites.

To minimise administrative burden over the lifetime of a Grant, and for the avoidance of any doubt, the HRB wishes to advise that in instances such as those described above\*, and where the Host Institution is satisfied that the extension request is justified, that it does not alter the Grant Funded Activities as set out in the Grant Agreement and it is feasible within the funds already made available, requests do not need to be submitted to the HRB as they arise. Instead,

the Host Institution can complete a Grant Amendment Request Form to request a NCE of up to 12 months (which may arise due to one or more reasons) and submit it to the HRB **no earlier than 12 months and no later than three months** before the original Grant end date.

\*Where delays in staff recruitment occur, including for PhD candidates, Host Institutions may wish to issue a contract of employment that goes beyond the original Term of the Grant as set out in the HRB Grant Agreement and they may require assurances that the HRB are agreeable to an extension to the Grant Term. In such instances, the Host Institution should contact [grantchanges@hrb.ie](mailto:grantchanges@hrb.ie) setting out the nature of the request and a **Letter of Comfort** can be provided promptly by the HRB, confirming the HRBs agreement to an extension. The Letter will note that this change should be included in a NCE request to be submitted by the Host Institution further into the Grant Term, but no later than three months prior to the original Grant End Date.

2. Exceptions to the maximum period of 12 months will be considered in cases of periods of statutory leave.
3. If any other exceptional circumstances arise, the Host Institution should contact the HRB and the HRB will assess on a case-by-case basis.
4. Requests from the Host Institution for a NCE must provide adequate justification for the extension and assurances that it is required to ensure completion of the previously agreed Grant Funded Activities set out in the Grant Agreement. The fact that funds are remaining in the Grant is not in itself sufficient justification for requesting an extension.
5. The HRB will not process any requests for NCE submitted later than three months before the Grant end date. In such cases, all HRB funding remaining unspent at the end of the Term of the Grant must be returned to the HRB.

## Process

### Request for No-Cost Extension

1. The Host Institution must submit a HRB Grant Amendment Request Form to [grantchanges@hrb.ie](mailto:grantchanges@hrb.ie).

This should include:

- (i) Details of the Grant and justification for the proposed no-cost extension.
- (ii) Assurances that the extension does not alter the Grant Funded Activities set out in the Grant Agreement.
- (iii) A revised budget including the budget details for the proposed no-cost extension should be submitted where the term of the no-cost extension is for 6 months or more, or involves an allocation of €50,000 or more. The NCE must be feasible within the funds already made available.

- (iv) Assurances regarding any changes to animal licences, ethics or any other approvals resulting from the NCE.

The HRB may request additional information as required to process the NCE request.

2. Please note that a NCE request may involve a request to move funds from one budget category to another and in such instances, the Budget Reallocation Request section of the HRB Grant Amendment Request Form should also be completed.
3. Once a NCE is approved by the HRB, the HRB will communicate formally with the Host Institution to specify the new Grant end date and any other variations to the Grant Agreement.

For the avoidance of any doubt, the Terms and Conditions of the original Grant Agreement still apply during the period of the NCE.

#### **Request for a Letter of Comfort**

1. If a Host Institution requires a Letter of Comfort as described above, an email (with “Letter of Comfort” in the Subject Line) should be submitted to [grantchanges@hrb.ie](mailto:grantchanges@hrb.ie) with the following information:
  - (i) Grant reference number and PI.
  - (ii) Details setting out the nature/type of delay that has occurred, e.g. staff or postgraduate researcher recruitment delays, or gaps in staffing.
  - (iii) Details of the extension required and confirmation that this is feasible within the funds already made available (a detailed budget summary and expenditure plan is not required at this juncture) and does not alter the Grant Funded Activities set out in the Grant Agreement
  - (iv) Assurances that all resultant changes to personnel forms, animal licences, ethics or any other approvals will be provided to the HRB, as required.
  - (v) Confirmation that this change will be included in a subsequent NCE request later in the Term of the Grant.
2. Once a request is reviewed by the HRB, the HRB will communicate formally with the Host Institution.

Ends.