

No Cost Extension Requests



Northeastern
University

May 14, 2020

Learning Objectives

- Purpose of No Cost Extensions (NCEs)
- Understand elements required to submit/complete request
- Review Examples (NIH, NSF, NEH, DOJ/NIJ)

What is a No Cost Extension(NCE)?

- A request to extend the project period end date by up to 12 months if additional time beyond the established end date is required to assure adequate completion of the original scope of work within the funds already made available.
- No additional funds may be requested.
- NCEs are permitted, provided the Notice of Award does not prohibit the extension and the project's approved scope will not change.
- NCEs may not be exercised merely for the purpose of using the unliquidated balances.
- NCEs are ordinarily not authorized to extend an award that contains a zero balance.

Expanded Authorities

Uniform Guidance [2 CFR §200.308](#), paragraph (d)(2) permits federal agencies to waive prior approvals for certain actions, such as initial NCEs.

Grantees must **notify** the Federal awarding agency in writing with the supporting reasons and revised period of performance specified in the Federal award. This one-time extension may not be exercised merely for the purpose of using unobligated balances.

With this additional flexibility, Grantees may initiate a one-time extension of the period of performance by up to 12 months unless one or more of the following conditions apply.

Extensions require **explicit prior Federal awarding agency approval** when:

- (i) The terms and conditions of the Federal award prohibit the extension.
- (ii) The extension requires additional Federal funds.
- (iii) The extension involves any change in the approved objectives or scope of the project.

Transaction Form

NU Research Enterprise Services Transaction Form

Log #
For NU-RES use only

PI: PI ID: Funding Agency:
 Dept Admin: ePAWS#: Funding Agency Award#:
 Dept: Banner G#: G0000 Prime Funding Agency:
 Org Code: Fund#: Total Project Award Period: Start: End:

Fields outlined in red are required. Guidance on this form, including when a chair signature is required, is on the how-to guide. Contract intake information (page 2) does not require any signatures.

Submit completed form to NU-RES@northeastern.edu. All required documentation must be attached.
If funding agency approval is required, please include a draft letter, addressed to the funding agency contact, in a Word file.

Advance Account Funding Agency Allowability: New Fund # Required: NU-RES Use Only: AIR Account
 Effective Date for Pre-Award Charges: Dept Account#: Cost-Share Account#:
 Not To Exceed Amount: \$ Attach: 1) written confirmation of the intent to fund the project; 2) budget matching the *not to exceed* amount; 3) Copies of applicable approvals (i.e. IRB/IACUC/IBC).

Carryover Attach: 1) explanation for the the unobligated balance; 2) revised budget and justification matching the carryover amount.

Rebudget New fund # Required: Rebudget is part of a project scope change:
 Attach: 1) revised budget (based on available funds; 2) if applicable, documentation of the change in project scope.

No Cost Extension Current End Date: Requested End Date:
 If there are changes in effort for key personnel or other compliance approvals, during the NCE period: provide details of the changes below.

Change in PI or Org/Dept Changing the: For PI Change: indicate the PI name, PI ID and Org Number. For Org change: indicate the Org/Dept Number.
 Changing FROM: Changing TO:

Other Action Please summarize the action / request here:

This Action Impacts the Following Approvals N/A or None List subaward(s) impacted by this request:
 fCOI IRB/HSDf IACUC IBC DURC SCRO sUAS

Effort During NCE

- Terms and conditions of the award should be reviewed to determine sponsor requirements regarding effort during the NCE.
- In accordance with sponsor guidelines, effort updates should be outlined on the Transaction form.
- Measurable effort during the NCE is typically required for Key Personnel.
- **NIH:** With the exception of grant programs that have an effort requirement, or where terms and conditions prohibit such reductions, NIH will not require prior approval for the reduction in effort for Senior/key personnel named in the Notice of Award (NoA) during a no-cost extension.
 - **However, consistent with the NIH Grants Policy Statement Chapter 8.1.1.3, for active NIH awards, the PD/PI and other Senior/key personnel named in the NoA must devote a measurable level of effort.**
- **NSF:** According to [NSF FAQs](#), additional effort on the part of the PI beyond what was initially funded in the proposal is not implied by a NCE. Generally, a NCE is a rearrangement in the timing of when the effort will take place.

NIH No-Cost Extensions

[NIH Grants Policy Statement Section 8.1.1.3](#)

May extend the final budget period one time for a period of up to 12 months beyond the original completion date shown in the NoA if:

- no term of award specifically prohibits the extension,
- no additional funds are required to be obligated by the NIH awarding IC, and
- the project's originally approved scope will not change

Initial NCEs:

NU-RES will use the eRA Commons No-Cost Extension feature to electronically **notify** NIH that NU is exercising its **one-time authority** to extend without funds the completion date of an award.

- Extension feature becomes available in eRA Commons 90 days before the project period end date.
- Notification must be made before the last day of the current project end date.

NIH No-Cost Extensions

Initial NCEs, Late Submission:

eRA Commons No-Cost Extension feature cannot be used.

The extension notification **becomes a request and that requires the approval** of the [IC](#) GMO (see below).

Subsequent (and late initial) NCE Requests ([NIH GPS Section 8.1.2.2](#)):

Additional NCE **requests**, as well as late initial requests, must be submitted to NIH as a written [prior approval](#) request to the NIH awarding [IC](#) for consideration. (See [Administrative Requirements-Prior Approval Requirements](#) for extension requiring additional funds.)

Subsequent NCE requests should be submitted at least 30 days before the current end date.

*Note, the awarding agency may request additional information, such as a progress report, a budget document, and/or a justification document.

Transaction Form must include:

- A description of the project activities that require support during the extension and a statement about the funds available to support the extension;
- The revised period of performance; and
- Unobligated balance

NSF No Cost Extensions

Grantee-Approved Extension (Notification) [PAPPG Ch.VI\(D\)\(3\)\(c\)](#)

- Grantees may authorize a **one-time extension** of the end date of the grant of up to 12 months
- **At least 10 calendar days prior to end date**, the grantee shall notify NSF of the above information.

NSF-Approved Extension (Request):

- Subsequent (and late) requests for additional time beyond the extension provided by the grantee must be submitted as a formal request, signed and submitted by the AOR via use of NSF's electronic systems.
- **Submitted to NSF at least 45 days prior to the end date of the grant.**
- All late requests must include a strong justification as to why it was not submitted earlier.
- The request must explain:
 - Need for the extension;
 - Include an estimate of the unobligated funds remaining and a plan for their use; and
 - Confirmation that the plan adheres to the previously approved objectives of the project.
- NU-RES and PI will be electronically notified of approval /rejection of this request
- If approved, NU-RES will receive an amendment to the grant specifying a new end date.

NSF No Cost Extensions

Reminders:

- Extension is necessary to assure adequate completion of the original scope of work within the funds already made available.
- May not be exercised merely for the purpose of using the unliquidated balances.
- Sufficient funds remain (Grantees are not authorized to extend an award that contains a zero balance).
- All grantee-approved extension notifications must be signed and submitted by the AOR via use of NSF electronic systems.
- No amendment will be issued for Grantee-Approved NCEs. The revised end date can be viewed via NSF's electronic systems.
- Subsequent NCEs will typically be communicated by amendments to the award or written approval from NSF.
- Grantees are cautioned not to make new commitments or incur new expenditures after the end date of the award in anticipation of a no-cost extension.

Transaction Form must include:

- Supporting reasons / justification for the extension;
- The revised period of performance; and
- Unobligated balance

NEH No Cost Extensions

National Endowment for the Humanities (NEH): [General Terms and Conditions, Art. 12](#)

Initial NCEs- *Notification*:

Grantees have the authority to approve a **one-time extension** of the end date of the period of performance **of up to 12 months** if:

- Additional time is required to complete the original scope of the project;
 - Within the funds already made available; and
 - may not be exercised merely for using the unliquidated balance of project funds.
- **At least 30 calendar days before** the end of the original period of performance the institutional grant administrator must notify the NEH Office of Grant Management in writing via eGMS Reach of the new expiration date **and must provide justification** for the extension period.

Transaction Form must include:

- Supporting reasons / justification for the extension;
- The revised period of performance; and
- Unobligated balance

NEH No Cost Extensions

National Endowment for the Humanities (NEH): [General Terms and Conditions, Art. 12](#)

Subsequent NCEs (and NCEs Greater than 12 months)- *Request:*

- Initial NCEs for greater than 12 months **and** subsequent NCEs require **approval** from the NEH Office of Grant Management.
- A written prior approval request must be submitted to the NEH Office of Grant Management via eGMS Reach **at least 30 calendar days prior to the end of the current period of performance.**
- The request must be submitted by the institutional grant administrator and **must include:**
 - Detailed justification for the extension;
 - An estimate of the unexpended award funds; and
 - Plan of work for the activities that will be undertaken during the requested extension period.

Transaction Form must include:

- Supporting reasons / justification for the extension;
- The revised period of performance; and
- Unobligated balance

DOJ No Cost Extensions

Department of Justice (including NIJ): [DOJ Grants Financial Guide, Ch.III](#)

Generally, the following shall apply to all grants and cooperative agreements:

- No more than one NCE may be made to an award
- Submit the GAN via GMS at least 30 days prior to the end of the award period
- NCE may not exceed 12 months and may only be approved if:
 - the period of performance has not expired;
 - no significant performance or compliance issues;
 - purpose of extension is not merely for the purpose of the enabling the recipient to use unobligated balances
 - All applicable Federal Financial Reports and Progress Reports must be on file and current.
 - All special conditions attached to the award must be satisfied, except for those conditions that must be fulfilled in the remaining period of the award.

A narrative justification must be submitted with the project or program extension request. Complete details must be provided, including the justification and the circumstances which require the proposed extension.

DOJ No Cost Extensions

Department of Justice (including NIJ): [DOJ Grants Financial Guide, Ch.III](#)

A NCE may be made **only if supported by a robust narrative justification** which establishes:

- The need for the extension
- Indicates the additional time required the extension
- The extension is for the benefit of the Federal government; and
- Contains a plan and timeline.

In addition, the recipient must explain the effect a denial of the request will have on the project or program.

A response should be received from the awarding agency within 15 working days of receipt of the request.

Transaction Form must include:

- Supporting reasons / justification for the extension;
- The revised period of performance; and
- Unobligated balance

Summary



- ✓ Transaction form must include:
 - ✓ All required fields completed
 - ✓ Supporting reasons/ justification for extension
 - ✓ Unobligated balance
 - ✓ Any other agency-specific requirements
 - ✓ Adjustments of effort

- ✓ Terms and conditions of the award should be reviewed to determine sponsor requirements regarding effort during the NCE.

- ✓ Measurable effort during the NCE is typically required for Key Personnel.

Questions? Contact Us!

General Mailbox: NU-RES@northeastern.edu

Staff by Portfolio Assignment:

<https://research.northeastern.edu/nu-res/search-by-department-college/>

Satellite Hours:

Each Thursday, NU-RES staff hosting [Virtual Satellite Hours](#) via Teams 1:30-2:30pm