RUTGERS

Research & Sponsored Programs Procedure
No Cost Extension (NCE) Request

1. Overview

No Cost Extension (NCE) is an award provision that allows the Principal Investigator (PI) or Project Director (PD) to request additional time beyond the end of the project period to successfully complete the projects scope of work. Each Sponsor has specific requirements for when and how to request an extension, the additional time is usually up to twelve (12) months and as the phrase "no cost" suggests, there is no additional funding provided by the Sponsor.

2. Purpose

This procedure outlines expectations and requirements for No Cost Extensions and to provide guidance to faculty/project directors regarding the process for requesting and successfully obtaining a project extension. It also provides guidance to faculty/project directors to submit their requests as expeditiously as possible to avoid delays, interruptions and project performance. This procedure identifies when an NCE should be requested and what information should be included. These requests are reviewed and managed via Research and Sponsored Programs (RSP).

3. Who Must Comply

Principal Investigators
Project Personnel/Staff
Deans Directors, Chairs and Department Heads
Department Personnel
Business Managers
Research and Sponsored Programs
Office for Research

4. Definitions

Prior approval request: Advanced request for Approval/Denial from applicable sponsor. Commonly required if institutional authority if not provided. This will be noted in Sponsor award notice.

Expanded Authority: Commonly referred to as Institutional Expanded Authority. Provides the institution authority to complete certain actions without sponsor prior approval. First NCE initiated during appropriate timeline is authorized by Institutional Expanded Authority for many federal sponsors.

5. Procedure

Principal Investigator/Project Directors must monitor and review sponsored programs timelines and end dates. As the end date of the project period is nearing, PI/Project director will need to make a determination whether sufficient time and resources are available to complete the project. The award document or the sponsor's terms and conditions should indicate the process for obtaining an NCE. Typically, an NCE may be requested by the PI when **all three** of the following conditions are met:
- The end of the project period is approaching; AND
- There is a programmatic need to continue the research; AND
- There are sufficient funds remaining to cover the extended remaining effort, note that funds remaining on the award is not a sufficient reason to request a NCE

First No Cost Extension (1ˢᵗ NCE) - Process and Requirements:

Upon determination that an NCE is required, please contact your RSP Grants Specialist via email with the following information:

1. *Award information*, including the award number, award title and sponsor name
2. *Justification Letter*, detailing:
   - what unexpected event(s) delayed the progress and completion of the project;
   - how the unexpected events were remedied;
   - what progress will occur during the NCE period to successfully complete the Scope of Work (SOW); and,
   - how the NCE will benefit the award's results
3. *Anticipated Balance*, indicating the anticipated amount of funds remaining for the NCE period
4. *Compliance Information* (if applicable), detailing the protocol type (e.g., IRB, IACUC, REHS), number, title, and expiration date
5. *Justification for the late request (if the extension time frame has lapsed)*

Extensions may be requested ONLY FOR PROGRAMMATIC reasons, such as the work took longer than expected. However, it is appropriate to state that sufficient funds remain to support the project for the additional period of time.

No-Cost Extension Deadlines:

Sponsors require NCE requests be submitted prior to the award's current end date. Notify the RSP Grant Specialist as soon as possible upon determining the need for an NCE request in order to ensure that there is adequate time for review, approval and adherence to Sponsor-specific guidelines and electronic systems. Review the award document terms and conditions to determine applicability and prior approval requirements. A few examples of Sponsor deadlines for NCE requests are presented below:

Award Type	Detail	Example Deadlines
Federal One-time Extension (*with institutional expanded authority*)	Some federal sponsors have delegated the responsibility for approving NCEs for awards to the Institution. For example, NSF, NIH, ARO, AFOSR, NEA, NEH, DOE and DoED allow an Institution to internally approve a one-time request to extend the end date of the project period up to an additional 12 months, unless otherwise noted in the award terms and conditions. Prior approval is required for any subsequent extension(s)	For NIH, request is due between 0-90 days prior to award expiration. For NSF, request is due at least 45 days prior to award expiration
Federal, State, Municipalities, and Not-For-Profit Entities with *Prior Approval Required.*	Other federal, state, municipalities and not-for-profit sponsors require prior approval for NCE requests. For example, ONR and State of New Jersey general require prior approval for NCE request. If the sponsor has not delegated approval authority to the Institution, a written prior approval must be obtained by the Sponsor.	These requests should be submitted at least 45 days prior to award expiration

Note: *NIH and NSF require the NCE requests be submitted via the sponsor electronic system (NIH via eRA commons and NSF via Research.gov).*

Outcome of NCE Requests:

Federal Sponsors noted above allow Institutions under expanded authority to process and approve the 1st NCE requests in the relevant sponsor system. These requests are approved automatically as long as the request is initiated, submitted and acknowledged by the sponsor system prior to the project end date.

All other federal agencies, state, local and private sponsored projects, require prior approval from the sponsors for a NCE. A formal letter/e-mail should be forwarded to RSP for review and approval prior to submission to the sponsor. Rutgers will need to wait for the appropriate response regarding approval or denial from sponsor before processing the new end date.

The RSP Grant Specialist will notify the PI if the Sponsor approves or rejects the NCE request. The Sponsor always retains the right to deny a NCE request. Examples of reasons to deny might include:

- An extension may not be granted solely because there is money left over. Programmatic benefit must be justified.
- Funding may have come from a prior year's appropriation and cannot be extended.
- The amount requested in the extension request appears excessive to the Sponsor.
- Request falls beyond the required NCE request deadline.

It is best to request the NCE ahead of time to manage an orderly accomplishment of project work and to have a contingency plan in case the Sponsor does not approve the extension.

Also note: First NCE requests under expanded authority that are not submitted within the appropriate timeline, will need to be submitted as a Second No Cost Extension request. Sponsor systems are only available for a limited amount of time and the award will move toward closeout if an extension is not requested in a timely manner. There is still a chance to request an NCE if deadline has passed but should be used only under extreme circumstances (at risk for denial).

Subawards: If there are subawards under this prime award, they will not automatically be extended. Subaward modification checklists must be completed by the PI and department in order to flow down the revised end date to the subawardee.

Second No Cost Extesion (2nd NCE) - Process and Requirements:

Occasionally, there is a need beyond the first NCE for additional time on the project. This will necessitate the need for a second NCE request. It is important to note that 2nd or 3rd No Cost Extensions are not guaranteed. PI should reach out to the sponsor program officer ahead of time if they anticipate needed additional time beyond a first no-cost extension.

Depending on the sponsor the requirements for a second NCE require a much more detailed review:

1. *Award information*, including the award number, award title and sponsor name
2. *Justification Letter*, detailing:
     - what unexpected event(s) delayed the progress and completion of the project;
     - how the unexpected events were remedied;
     - what progress will occur during the NCE period to successfully complete the Scope of Work (SOW); and,
     - how the NCE will benefit the award's results;
3. *Anticipated Balance*, indicating the anticipated amount of funds remaining for the NCE period;
4. *Compliance Information* (if applicable), detailing the protocol type (e.g., IRB, IACUC, REHS), number, title, and expiration date;
5. *Justification for the late request (if the extension time frame has lapsed)*

Extensions may be requested ONLY FOR PROGRAMMATIC reasons, such as the work took longer than expected. However, it is appropriate to state that sufficient funds remain to support the project for the additional period of time.

If you have any questions/concerns regarding any of the information included herein, please contact your RSP Grant Specialist for further assistance.

6. Roles and Responsibilities

Department Personnel	• Support the current PI with the request for No Cost Extensions • Provide guidance on Department/School policy for additional No Cost Extension review.
Principal Investigators	• Monitor project timelines and review sponsor policies on NCE request • Review budget expenditure balances and expense projections • Submit request via e-mail to RSP Grants Specialist • Make sure to include appropriate information/documentation with request. • Complete subaward modification checklist if NCE is approved to flow down extension subawardee.
Research and Sponsored Programs	• Support the PI in the NCE request review and submission. Determining sponsor and internal requirements. Processing First NCE via Sponsor Portal or submitting for sponsor prior approval. • Update the RAPSS Award record via an Award Modification to indicate approval of NCE.

7. Resources

    a. RSP website for NCE guidance
    b. Subaward Processing