



Research and Sponsored Programs Procedure

No Cost Extension (NCE) Requests

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 project's 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 provides guidance to faculty/project directors regarding the process for requesting and successfully obtaining a project extension. It also provides guidance to faculty/project directors on submitting their requests as expeditiously as possible to avoid delays, interruptions, and adverse impacts on 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

This policy applies to all members of the University community involved in sponsored projects that include or may include fabricated equipment, including:

- Principal Investigators
- Project Personnel/Staff
- Department Personnel
- Deans, Directors, Chairs, and Department Heads
- Research and Sponsored Programs (RSP)
- Office for Research

4. Definitions

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

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

5. Procedure

The Project Director/Principal Investigator (PD/PI) must monitor and review the timelines and end dates of sponsored programs. As the end of the project period approaches, the PI/Project director will need to determine 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. The remaining funds on the award are not sufficient reason to request an NCE.

A. First No Cost Extension

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

- Award information, including the award number, award title, and sponsor name
- 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)
 - How the award's results will benefit from an NCE.
- Anticipated Balance, indicating the anticipated amount of funds remaining for the NCE period
- Compliance Information (if applicable), detailing the protocol type (e.g., IRB, IACUC, REHS), number, title, and expiration date
- Justification for the late request (if the extension time frame has lapsed)

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

B. Second No Cost Extension

Occasionally, there is a need beyond the first NCE for additional time on the project. This will require 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 needing additional time beyond a first no-cost extension

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

- Award information, including the award number, award title, and sponsor name
- Justification Letter, detailing:
 - Any 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)
 - How the award's results will benefit from an NCE.
- Anticipated Balance, indicating the anticipated amount of funds remaining for the NCE period
- Compliance Information (if applicable), detailing the protocol type (e.g., IRB, IACUC, REHS), number, title, and expiration date
- Justification for the late request (if the extension time frame has lapsed)

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

C. No Cost Extension Deadlines

Sponsors require NCE requests to 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 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).	<ul style="list-style-type: none"> 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). 	<ul style="list-style-type: none"> For NIH, the request is due between 0-90 days prior to the award expiration. For NSF, the request is due at least 45 days prior to the award expiration.
Federal, State, Municipalities, and Not-For-Profit Entities with Prior Approval Required.	<ul style="list-style-type: none"> Other federal, state, municipal, and not-for-profit sponsors require prior approval for NCE requests. For example, the ONR and the State of New Jersey generally require prior approval for NCE requests. If the Sponsor has not delegated approval authority to the Institution, the Sponsor must obtain prior written approval. 	<ul style="list-style-type: none"> These requests should be submitted at least 45 days prior to the award expiration.

Note: NIH and NSF require the NCE requests to be submitted via the sponsor's electronic system

- NIH: via eRA Commons.
- NSF: via Research.gov.

D. 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 automatically approved if they are 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 an 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 sponsor's response regarding approval or denial before processing the new end date.

The RSP Grant Specialist will notify the PI of the Sponsor's approval or rejection of the NCE request. The Sponsor always retains the right to deny an 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 in advance to ensure an orderly completion of project work and to have a contingency plan in case the Sponsor does not approve the extension.

Note: First NCE requests under expanded authority that are not submitted within the appropriate timeline must be submitted as a Second No Cost Extension request. Sponsor systems are available for only a limited 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 the deadline has passed, but it should be used only under extreme circumstances (at risk of denial).

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

6. Roles and Responsibilities

A. Internal Transfer – Change in Principal Investigator or Program Director

Department Personnel	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Monitor project timelines and review sponsor policies on NCE requests. • Review budget expenditure balances and expense projections. • Submit request via e-mail to RSP Grants Specialist. • Make sure to include appropriate information/documentation with the request. • Complete the subaward modification checklist if NCE is approved to flow down the extension subawardee.
Research and Sponsored Programs	<ul style="list-style-type: none"> • Support the PI in the NCE request review and submission. Determining sponsor and internal requirements. Processing First • NCE via the Sponsor Portal or by submitting for sponsor prior approval. • Update the RAPSS Award record via an Award Modification to indicate approval of NCE.



7. Resources

- [Research & Sponsored Programs website](#)
- [No Cost Extensions](#)
- [FDP Prior Approval Matrix](#)
- [Roles and Responsibilities Matrix](#)

8. Contact

- [Research and Sponsored Programs](#)