



Research Operations Process – No Cost Extension for Sponsored Projects

Overview

A No-Cost Extension (“NCE”), sometimes referred to as a No Cost Time Extension (NCTE) is an extension of the period of performance beyond the end date of an award. Extensions are sometimes needed to allow the Principal Investigator (“PI”) to successfully complete the scope of work or research objectives. As the phrase “No Cost” suggests, there is no additional funding requested by the PI or provided by the Sponsor (federal agencies, state counties, foundation donors, etc.).

A No-Cost Extension 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.

Procedure for Departmental Research Administrators

3 months (90 calendar days) prior to the end date of an award, review the financial and programmatic status of the award. If the project is ending and has a remaining balance, reach out to the Post Award Team to:

- Inform the need for a NCE when there is a remaining balance
- Review the Notice of Award and governing award guidelines
 - Check if prior approval from the sponsor is required
 - Verify the required documentation/information necessary to request the NCE
 - Contact the Post Award Analyst if you have any questions or concerns about NCE terms and conditions
- Once a decision is made, coordinate with PI to gather required documentation
- Submit documentation to the Post Award Team for review and approval

Procedure for Research Operations Post Award Team

3 months (90 calendar days) prior to the end date of an award, review the financial and programmatic status of the award. If the project is ending and has a remaining balance, coordinate with the divisional research administrator and PI to:

- Determine if they require an NCE and if they will carry forward any portion of the remaining balance, as applicable
- If yes, review the Notice of Award and governing award guidelines

- Check if prior approval from the sponsor is required
 - Verify the required documentation/information necessary to request the NCE
 - Contact the sponsor for any questions or concerns
- Once a decision is made, coordinate with Division/PI to gather required documentation
- Submit documentation to the sponsor and inform the Division/PI on submission
- Follow-through with the sponsor for approval and any additional requirements
- Once NCE is approved, update the end date of the project on all required pages and notify Division/PI

Key Considerations

*If **no** prior approval is required*, additional documentation and a formal request may not be required for submission. However, the sponsoring agency must be notified of the extension and its duration (6 months, 12 months, etc.). This could either be a submission within the sponsoring agency portal or an email to the grants management officer. Notifying the sponsoring agency is necessary to confirm the new end date.

*If **prior approval is required***, Division/PI must submit a completed and signed Prior Approval Request form notifying the Post Award analyst of the intent to initiate NCE. Along with the form, the following additional documentation is required:

- *Award information*, including the award number, award title and sponsor name
- *Justification Letter*, detailing:
 - Details of the unexpected event(s) that delayed the progress and completion of the project
 - Steps being taken to address the delay
 - Details of the progress that will occur during the No-Cost Extension period to successfully complete the Scope of Work and research objectives
 - Justify how the No-Cost Extension will benefit the grant's objectives
- *Anticipated Remaining Balance*, that indicates the anticipated amount of funds remaining for the No-Cost Extension period
- *Compliance Information* (if applicable), detailing the protocol type (e.g., IRB, IACUC, REHS), number, title, and expiration date



Foundation Grants

For requesting NCE on foundation grants:

- If there are any questions or concerns, the departmental research administrator and the Post Award team will contact the Office of Foundation Relations in the CHLA Foundation Department.
- The departmental research administrator should submit the documentation to the Research Operations Post Award team. Upon review and approval, the Post Award team will coordinate with the Office of Foundation Relations to facilitate submission to the foundation donor.
- After submission, the Office of Foundation Relations will follow-through with the foundation donor for approval and any additional requirements and notify the Post Award Team and PI.

NCE requests on NIH awards

First NCE Request

NIH Standard Terms of Award include the provision for grantees to extend the final budget period of a previously approved project period **one-time** for a period of 1 to 12 months, without additional NIH funds, and without prior approval. This request will appear **90 days before** the project end date. This one-time request will be made available within eRA Commons for submission. Once submitted, the NCE request triggers an automated email notification to the grants management specialist and no further action is required by the recipient.

2+ NCE Request

Any NCE requests after the first time is classified as needing Prior Approval. This can be requested when there are **less than 90 days before** the project end date but should be submitted **at least 30 days before**. The request should be submitted with an official letterhead addressing the following items:

- Explanation on why more time is needed
- Indicate how long of an NCE is needed
- Indicate the estimated unobligated balance
- Detailed justification on how the unobligated balance will be utilized
- Address effort levels for Key Personnel

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.

For certain sponsors, when the authorized official is the Director of Research Administration, the Post Award Analyst will coordinate with the Grants team for signature and submission.

Generally, sponsors require NCE requests to be submitted prior to the award's current end date. In cases where prior approval is not required or expanded authority has been granted, notifying the agency of the new end date is still necessary.

Below is a matrix that provides general guidance of the prior approval requirements and timeline. **It is recommended to review the NOA/Agreement to confirm any award specific guidelines.** For example, within HHS, there are multiple offices that may deviate from the general due date guidelines.

Agency	1st NCE Request		Additional NCE Request		Resource Link
	Prior Approval Required	Deadline before Current End Date	Prior Approval Required	Deadline before Current End Date	
NIH	x	within 90 days	✓	at least 30 days	NIH - 8.1.2 Prior Approval Requirements
NSF	x	at least 10 days	✓	at least 45 days	NSF - Chapter VI, Section D.3.c
DoD	x	at least 10 days	✓	at least 21 days	DoD R&D - ONR Addendum
HHS	✓	at least 10 days	✓	at least 10 days	HHS Grants Policy Statement
DOJ	✓	at least 30 days	✓	at least 30 days	DOJ - 3.2 Period of Availability of Funds

Relevant Resources:

[eRA Commons - Prior Approval Module](#)

[NSF - Prior Approval Matrix](#)