

McCormick Research Administration Checklist:

No-cost Extension Requests

No Cost Extension (NCE) requests are a common, routine post-award action, but there are still risks associated with extending projects and submitting incomplete or inaccurate information with the request. It's important to research the questions below before filling out a NCE Change Request (CR) and to pay close attention to the information you include with it.

Questions to Consider:

1. Is the award under FDP/RTC terms?
2. What is the submission method for the NCE request?
 - a. Is there a deadline for submission (e.g. 10 days before the original end date)?
3. How many months is the requested extension?
4. What number NCE on the award (first, second, etc.) is the current request?
5. What is the unobligated balance on the account and how does it compare with the time remaining and "burn rate" for the project?
6. Are there any subcontracts, and does the PI want to extend them?
 - a. If Yes to these questions, does the PI want to issue additional funding during the NCE?
7. Are there any subprojects, and does the PI want to extend them?
8. Is re-budgeting or a budget for the proposed NCE needed?
9. What are the current key personnel effort commitments and salary recover plans, and will there be any significant ($\geq 25\%$) reductions?
 - a. If yes, what is the justification for the significant reduction(s)?
10. Is there animal or human subjects work on the project, and if so will it continue during the NCE?
 - a. If yes, do existing protocols cover the NCE period or are extensions needed?
11. What is the reason for the delay?
12. What will be done during the extension period?

Items to Include with the Change Request (in addition to the system-required fields):

1. Copy of the GM045 showing the current project balance and for any subprojects, if any.
2. If applicable, copy of any updated/extended IACUC and/or IRB approval letters.
3. If the request submission method is not standard (e.g. NSF request submitted via Fastlane), information and/or documentation explaining what OSR should do (e.g. printout of an email from a foundation explaining what to include in the request).
4. Include any documentation for Sponsor requirements/deadlines to submit the NCE.

General Reminders on NCEs:

NCE Justification

"I should get an extension because I have money left over" is NOT an acceptable justification for a no-cost extension; the justification should be technical in nature. NCE justifications generally briefly summarize the reasons for the project delay and the project aims intended for completion with the remainder of the project funds in the extended budget period.

Effort on NCEs

Per NU Effort Reporting Policies (page 9), investigators' effort levels during no-cost extension periods are assumed by the sponsor to remain at the previously-established levels of the immediately preceding budget period. This is true regardless of the amount of funds being carried into the NCE period.

A low level of NCE funds may factor in to the PI's decision to a) formally lower his/her effort during the NCE period; b) request a shorter NCE of sponsor; or c) request that the department/school contribute all or some part of the NCE effort.

Per NU Effort Reporting Policies, at the time of an NCE request, notification/approval of sponsor regarding an investigator's effort must also be sought when effort will decrease by 25% or more in NCE period.

For more information about NU effort reporting policies, please see:

<https://www.northwestern.edu/coststudies/effort.html>