Objective

While it is the sponsor’s expectation that programmatic work will be completed by the project’s end date, occasionally extra time is needed to complete project objectives. If approved by the sponsor, a no-cost extension (NCE) allows additional time to complete the existing scope and objectives of the project without the need for additional funds to do so. Although a NCE may not be requested for the sole purpose of expending remaining funds, it is allowable to expend remaining funds during the NCE period. A NCE request may require prior approval from the sponsor (Sponsor Approved) within a specific timeframe. Under certain circumstances and under expanded authority, the institution is authorized to approve a NCE up to one full year (Duke Approved). The type of approval (Duke Approved or Sponsor Approved) depends on the type of award and any sponsor-specific terms, conditions or policies.

**STEPS FOR GRANT MANAGERS**

**At least 90 days prior to project end date:**

Grant Manager should run the “Projects Approaching End Date” report in Duke@Work to identify upcoming closing projects. For any projects appearing on this list, Grant Managers should reach out to the PI to determine if a NCE is needed and appropriate.

For those projects requiring additional time to complete, Grant Manager should review sponsor-specific guidelines and project award documents for appropriate procedures for requesting a NCE. Additionally, the following checklist provides a general list of questions and actions that Grant Managers should review and confirm when requesting a NCE.

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<th>A. <strong>PROGRAMMATIC</strong> <em>(in coordination with PI)</em></th>
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<td>1. Why is additional time needed?</td>
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<td>2. How much additional time is needed? (enter time in months, generally not to exceed 12 months)</td>
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<td>3. Are there any planned changes to the Scope of Work (SOW) during the NCE period?</td>
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<td>4. Do any subawards <strong>not</strong> require additional time?</td>
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before a modification will be issued to a subrecipient the SIR (ORA) or subrecipient progress report (ORS) must be completed indicating the necessary agreement changes.

5. Do all Duke personnel on the project who have a role in the design, conduct, analysis or reporting of results of research have an updated FCOI disclosure on file? □ YES □ NO

B. **ADMINISTRATIVE** *(in coordination with Institutional offices)*

1. Does this award require sponsor approval for NCE (not subject to expanded authorities)? □ YES □ NO

2. What # NCE is this? #

3. Are there any sponsor special instructions or specific restrictions for requesting a NCE? □ YES □ NO

4. Does this project include a supplement that requires a separate NCE request? □ YES □ NO

   - If yes, and supplement also requires an extension, prepare a separate NCE request.

5. Is there any human subject (IRB) work, including any use of identifiable private information for research purposes, being conducted during the NCE period? □ YES □ NO

   - If yes, ensure that all protocols cover the NCE period or request extensions to protocols as needed.

6. Is there any animal subject (IACUC) work being conducted during the NCE period? □ YES □ NO

   - If yes, ensure that all protocols cover the NCE period or request extensions to protocols as needed.

7. Is there any biosafety (IBC) work being conducted during the NCE period? □ YES □ NO

   - If yes, ensure that all protocols cover the NCE period or request extensions to protocols as needed.

C. **FINANCIAL**

1. What is the current estimated unobligated balance of the award? $

2. Based on the current burn rate, are there enough funds to carry out the project work through the life of the NCE? □ YES □ NO

   - If no, what is the plan?

   - Review the current backstop code and change if necessary.

3. Is a rebudget or revised budget required for the proposed NCE period? □ YES □ NO

   - If yes, a CAS/Rebudget form must be submitted after NCE is approved.

4. Are there any significant changes in sponsor key effort commitments (e.g., >25%) □ YES □ NO

   - If yes, obtain explanation for change in effort and submit notification of effort change to sponsor if necessary.

Submit NCE Request Form **at least 15 days prior to sponsor’s required submission date** or Project End Date, whichever is earlier. ORA/ORS/DOCR will review NCE requests within 7 business days.
PROCEDURES FOR COMPLETING NCE REQUESTS:
DEPARTMENT AND CENTRAL OFFICE RESPONSIBILITIES AND TIMELINES

For “Duke Approved” NCEs:
Upon review and approval of the request, ORA/ORS/DOCR will update the status in SPS to “Duke Approved” and notify TBS to update the project end dates. The Grant Manager who initiated the NCE Request Form will receive an email notification upon this status update which indicates that work and spending can continue on the project. Contact TBS for SAP or ORA/ORS/DOCR for SPS if the project end dates have not been updated within 5 business days from email notification.

If warranted, the form will be “Returned for Changes” or “Denied” with comments from ORA/ORS/DOCR.

For “Sponsor Approved” NCEs:
Upon institutional review and approval of the request, ORA/ORS/DOCR will update the status in SPS to “Approved for Sponsor Submission”. If contact information has been provided by the Department, ORA/ORS will request the NCE according to sponsor guidelines and copy or notify the Grant Manager who initiated the NCE Request Form on any email correspondence. ORA will also copy gcmail@mc.duke.edu.

If ORA/ORS is to make the request to the sponsor, the Department must provide the appropriate name(s) and email address(es) of the sponsor’s Administrative contact(s). For example, for NIH, provide the name and email address of the Grant Management Specialist (GMS). If others are to be copied on the request, those names and email addresses will need to be provided as well. This information should be communicated in the Internal Comments of the NCE Request Form. Any undeliverable emails will be forwarded to the Grant Manager for Departmental follow up with the appropriate sponsor contact. Any additional correspondence or messages unrelated to the NCE should be addressed by the Department.

If the Department is to make the request to the sponsor, they must copy their ORA/ORS administrative contact. For ORA, gcmail@mc.duke.edu should also be copied.

If warranted, the form will be “Returned for Changes” or “Denied” with comments from ORA/ORS/DOCR.

Once the sponsor approval is received, ORA/ORS/DOCR will update the status to “Sponsor Approved”, notify TBS to update the project end dates, and attach final sponsor approval documentation in the SPS Award record. The Grant Manager who initiated the NCE Request Form will receive an email notification upon this status update which indicates that work and spending can continue on the project. Contact TBS for SAP or ORA/ORS/DOCR for SPS if the project end dates have not been updated within 5 business days from email notification.

Departments are responsible for initiating any follow up needed if a response from the sponsor is not received. Requests in the “Approved for Sponsor Submission” status are outstanding, and Departments can monitor requests in this status for their BFRs along with a time stamp of when the approval was requested. Engage with your pre-award office for assistance as needed.

For Industry Contract NCEs:
The SPS NCE Request Form should be used for extensions to industry contracts that do not have a definitive end date (e.g., “study will continue until all work complete”). Follow the general guidelines for submitting a “Duke Approved” NCE request.
If the industry contract has a definitive end date, any sponsor-initiated extension will be treated as an amendment and managed through the contracting process at OCRC. No NCE Request Form is needed in this case and ORA/DOCR will extend the project period in SPS and will send the documentation to TBS for fund code extension once the amendment is fully executed. If, however, both parties’ obligations under the contract have been met and final payment received, then no amendment from the sponsor is necessary and the extension request should proceed through the “Duke Approved” NCE request process in SPS. The finality of the contract with the sponsor should be documented in the NCE request justification.

**Extending external subawards:**

Pre-award offices will issue new external subawards with extended end dates for all subs that are receiving NCEs within 6 weeks of submission of SIR (ORA) or subrecipient progress report (ORS).

**Discontinuing Closeout Notifications:**

Submission of the NCE Request Form serves as notification to the Implementation Teams to disable CONS notifications. A separate communication to the Implementation Teams or OSP is no longer needed.

**Additional Resources:**

- [No-Cost Extension Checklist Video](#)
- [No-Cost Extension: SPS Web Request Form Quick Reference Guide](#)