



Purpose: An established business process around no cost extensions (NCE) ensures that compliance aspects are adhered to and that appropriate records are kept in GMAS. The risks of not adhering to this process include that the NCE may not be approved and that unallowable costs are incurred.

Standards of Service: The department will send the NCE request to SPA 5 days prior to the required or desired submission date. SPA will review and submit or provide feedback within 2 business days. The GMAS Operations team will send out the action memo within 5 days once the NCE is approved.

Considerations:

- a) Institutional review: SPA should review all NCE requests prior to submission to sponsor.
- b) Terms: Sponsors expect that the original award terms and conditions extend throughout the project period, including a no-cost extension (NCE) period.
- c) Due dates: Often times sponsors will indicate due dates by which requests can be made, including no cost extensions. Be aware of important due dates!
- d) Change in status: For NIH awards, with the exception of grant programs that have an effort requirement or where terms and conditions prohibit such reductions, NIH will not require prior approval for the reduction in effort for Senior/key personnel named in the Notice of Award (NoA) during a NCE. However, consistent with the NIH Grants Policy Statement ([Chapter 8.1.1.3](#)), recipients are reminded that for active NIH awards, the PD/PI and other Senior/key personnel named in the NoA must devote a measurable level of effort. For other HHS agencies, consult your NoA or agreement as they may require prior approval for key personnel named in the proposal.
- e) Human subjects & animal approvals: If human subjects or animal research is occurring, it is essential to ensure that protocols are extended for the life of the project, including during the NCE period. No animal or human subject’s research expenses can be incurred if a protocol is expired.
- f) Subagreement & part of accounts: It is important to inform SPA whether subcontracts or other part of accounts will be extended as well. If not, appropriate action should be taken to close out these accounts.

Step	Role	Task/Activity
1	PI	Determines NCE is needed and informs GM.
2	GM	Checks with PI to determine if PI’s level of effort will change during the NCE. If effort reduction requires prior approval from sponsor, informs PI and works on request letter with PI and SPA.
3	GM	a) <u>For NIH when HSPH has approval to extend in eRA Commons:</u> Enters request into GMAS, including a programmatic explanation in the justification box.
		b) <u>For all other awards:</u> Enters request into GMAS and uploads into the document repository any other documents required by sponsor with a note in the justification box that says “Please see document(s) in request repository.
4	GM	Informs SRA that the request is ready for review.
5	SRA	Reviews request and provides feedback to GM.

6	GM	Locks and routes request for signatures. Obtains PI and other department signatures.
7	SRA	<u>If NIH 1st NCE</u> : Signs request in GMAS, Enters NCE in eRA Commons and sends eRA Commons confirmation email to OPS team for processing.
	GM/SRA	<u>For all other NCEs</u> : Follows sponsor guidelines for process and required documents to submit an NCE.
	AD	Reviews and signs in GMAS.
	GM/SRA	Forwards NCE approval to nga@hsph.harvard.edu.
8	OPS	Updates GMAS and issues Action Memo.