NIH No-Cost Extension Request Submissions

No-Cost Extension

A No-Cost Extension (NCE) is the granting of additional time to complete the programmatic aims of a sponsored project without any additional funding. NIH lifted the special award conditions (SACs) in early 2020, allowing most first NCE requests to be approved through Duke’s internal review process. Details related to NCE requests that require prior approval by NIH can be found on page three.

Requirements by Request Type

NCE Requests should be submitted with the information listed below via the NCE module in SPS. Refer to the NCE SPS Web Request Form Quick Reference Guide for guidance on using the SPS NCE Tool.

Duke Approved

1. SPS submission via NCE module
   • Details related to extension request
   • Confirmation of financial support and PI’s measurable effort via NCE form
2. Progress Report
   • NIH form PHS2590
   • Requires additional section for justification

See detailed guidance below and on page 2

Sponsor Approved

1. SPS submission via NCE module
   • Requirements same as Duke Approved requests
2. Approval to Spend form
3. Budget and Budget Justification
   • NIH form PHS2590
4. Progress Report
   • NIH form PHS2590
5. Scientific Justification Document
   • Formal letter with introductory sentence

See detailed guidance on pages 3 - 5

Duke Approved:
Submission Components for NCE Requests NOT Requiring Prior Approval

CAMT/ORA will review the NCE request submission via SPS. Once approved, the extension will be processed in eRA Commons and follow up will be communicated with all impacted partners.

NCE Request Form in SPS

• Project information
• Length of the requested extension period
• Estimated unobligated balance amount
• Confirmation that PI measurable effort will be maintained
• Institutional assurance approval dates, if applicable (e.g. IACUC, IRB)
• Completed Progress Report and Scientific Justification
• Guidance on NCE Tool in SPS is available at NCE SPS Web Request Form Quick Reference Guide

Progress Report

Required format is NIH PHS2590 “Form Page 5: Progress Report Summary” (https://grants.nih.gov/grants/funding/2590/2590.htm)

Scientific Progress Details

• Describe scientific progress since the last reporting period
• Incorporate charts, images, diagrams, etc., as needed
• Ensure consistent with progress described in previous reports

Justification for Additional Time

• Summarize the scientific activities that require support during the extension period
• Provide details on how the planned activities relate to the original aims and scope of the project

See Progress Report example on page 2
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Duke Approved NCE request documentation requirements

Below is an example of the Progress Report required for first-time NCE requests that can be approved by the Duke internal review process. Access form links, examples and templates via myRESEARCHpath.

Key Elements of the Progress Report

- Complete project related data fields
- Date range for activities described in report (not dates of NCE being requested)
- Describe progress since last submission
- Refer to specific goals & aims of the project
- Include images, graphs, charts, and diagrams as needed
- Detail activities and goals to be achieved during extension period

IMPORTANT NOTE:
Consistently relate progress and extension activities to the original scope and aims of the project

myRESEARCHpath provides examples & templates of required documentation
NCE requests requiring sponsor prior approval

NCE requests that require NIH prior approval should be submitted internally via the NCE module in SPS. CAMT (Campus/PAMC) or ORA (SOM/SON) will review and submit the request to NIH via eRA Commons. A comprehensive submission is essential for NCE requests requiring NIH approval. Specific formatting and documentation is needed for these requests. NIH responses and questions related to the submission will be coordinated by CAMT or ORA, partnering with the appropriate central offices and department as needed.

Sponsor Approved:
Submission Components for NCE Requests Requiring NIH Approval

NCE requests should be submitted with the information below via the NCE module in SPS. Submission requirements for NCE requests submitted to NIH for Prior Approval are described below.

### Required Documents for Duke Review

<table>
<thead>
<tr>
<th>NCE Request Form in SPS</th>
<th>Approval to Spend Form</th>
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</thead>
<tbody>
<tr>
<td>• Project specific information</td>
<td></td>
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<tr>
<td>• Length of the requested extension period</td>
<td></td>
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<tr>
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<tr>
<td>• Institutional assurance approval dates, if applicable (e.g. IACUC, IRB)</td>
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<tr>
<td>• Completed Progress Report, Scientific Justification, and Budget, Justification &amp; Checklist</td>
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<tr>
<td>• Internal form that must be signed by the Business Manager or Chief Administrator</td>
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<tr>
<td>• Confirmation the department authorizes project activities to continue beyond project end date and will cover any costs incurred if the NCE request is not approved</td>
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<tr>
<td>• Completed form must be attached in the ‘Supporting Documentation’ section of the NCE request tool in SPS</td>
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</tr>
<tr>
<td>• Access form via myRESEARCHpath or click <a href="#">here</a></td>
<td></td>
</tr>
</tbody>
</table>

**myRESEARCHpath** provides examples & templates of required documentation

### Required Documents for NIH Submission

**Progress Report**

The Progress Report is a detailed description of scientific progress since the last progress report was submitted with similar information and composition when included with an RPPR.

**Key Information:**
- Provide information using the NIH Form PHS2590
- Complete of the project related data fields, i.e. grant # & PI name
- Align the date range with the period of time related to the activities described (not dates being requested for NCE)
- Refer to specific goals & aims of the project
- Ensure progress presented aligns with previous reported achievements as well as planned activities for the reported period
- Include images, graphs, charts, and diagrams as needed
- Use a continuation page (PHS2590) if needed

*insert page numbers in footer when adding additional pages*
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NIH Approved NCE request documentation requirements

Below are key elements for the required documents for NCE requests requiring prior approval from NIH. Access form links, examples and templates via myRESEARCHpath.

Budget Documents (Budget, Budget Justification & Checklist)

Three budget documents are required: a detailed budget, budget justification & checklist. The information provided should detail how the unobligated balance will be used to support the planned activities described in the Scientific Justification.

Key Information:
- Use NIH Format PHS2590 for all 3 documents (see examples below)
  1. Form Page 2: Detailed Budget for Next Budget Period
  2. Form Page 3: Budget Justification (insert continuation page if needed)
  3. Form Page 6: Checklist
- Ensure information is consistent among all documents
- Provide an itemized breakdown of budget categories exceeding $1,000 in the Budget Justification

Scientific Justification

The scientific justification provides a summary of the activities planned for the NCE period as they relate to the original aims and scope of the project.

Key Information:
- Provide on departmental letterhead
- Address to the current GMS, found in eRA Commons
- Include PI name, grant number and document name
- Use intro statement that provides general information related to the request (see template for example)
- Ensure PI signature is included

IMPORTANT NOTE:
Consistently relate progress and extension activities to the original scope and aims of the project
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Consortium Budget Document Example

Each sub is required to submit the three required budget documents. The proposed budget should align with the activities requiring support described in the Scientific Justification.

Key Information:

- Use NIH Format PHS2590 for all 3 documents for EACH sub (see examples below)
  1. Form Page 2: Detailed Budget for Next Budget Period
  2. Form Page 3: Budget Justification (insert continuation page if needed)
  3. Form Page 6: Checklist
- Ensure information is consistent among all documents

Parent Budget Docs

- Include total of all sub budgets on Detailed Budget for NCE Period in the specified fields on budget page (circled in red on right)
  IMPORTANT: These totals should align with the direct totals on sub budgets and F&A cost totals on sub’s checklist (circled in red below)

- Confirm all F&A calculations are appropriately estimated & recorded

Sub’s Budget Docs

- Request information from the sub in advance of submission of NCE request
- Include a detailed budget, budget justification & checklist for each sub (same as parent requirement)
- Confirm details align with the planned activities described in the Scientific Justification for sub

Form Page 2: Detailed Budget for NCE Period
Form Page 3: Budget Justification with Continuation Page
Form Page 6: Checklist

* All administrative correspondence with NIH should be coordinated with CAMT or ORA *