Coffee with ORPA 2022-2023
March 1, 2023

Everything You Want to Know about No-Cost-Extensions

Presented by ORPA:
Courtney Kohut, Training & Shared Services Manager
Ivy Mong'are, Grant & Contract Administrator
Anne Ochiai, Senior Grant & Contract Administrator

Paula Looney, Assistant Director
Maria Mendes Hartstein, Subcontracts Manager
Lisa Owen, Assistant Subaward Administrator

Office of Research and Project Administration
Hybrid Etiquette

In-Person:
- Presentation starts at 9:15 a.m. with breakfast beginning at 8:45 a.m.
- Moderators will repeat any questions for the online audience
- Wait for a microphone with any questions
- Sign-in at the back of the room

On-line:
- Presentation begins at 9:15 a.m.
- Raise your hand with any questions
- Make sure to mute yourself unless asked to un-mute for your question or comment
- Use the chat feature
Agenda

› What is an NCE?
› Where do I begin with my request?!
› Planning, Preparing and Submitting
   › Information Warehouse Reports
› OPAR Completion
› Sponsor Extension Requirements
   › NSF
   › NIH
   › Foundations
   › Department of Defense Agencies
   › Industry
› Nuances around Fixed Price Contract Requests
› Subawards & NCE’s
› ORPA Website Guidance
› Open Discussion and Q & A
What is a no-cost extension?

- Requesting additional time beyond the initial period of performance on an existing sponsored award.
- Does not include requesting additional funds.
- Additional time may be needed for one of many reasons and a justification for the extension will always be required by a sponsor.
- Extension requests are not automatic but may be automatically approved by a sponsor (expanded authority): an action must always occur, and documentation (OPAR) must be completed with the pertinent backup information.
  - Some agencies (NIH, NSF) allow a grantee to approve a first NCE, but there are processes that must take place.
- Must be a balance on an award to request additional time.
- Cannot make an extension request just to spend down funds – there must be a program-based reason.
Where do I begin?

- When does the award end?
- Is there a current balance?
- Do I have subs?
- Who is my sponsor and what is the process?
- Do I need sponsor approval?
- What paperwork do I need?
- Do I have a justification from my PI?
- Is it too late??
Preparing for an extension request

Normally occurs one of two ways:

- PI comes to you and asks for an extension
- You notice the period of performance is coming to an end and a balance remains

Be proactive:

- Know your PI’s portfolio (regularly run the Individual Portfolio Report).
- If a PI comes to you with an extension request, it may be too late and require additional steps and approvals.
- Knowing expiration dates & award balances helps plan for extension requests.
- Always keep in mind if large purchases were budgeted on an award – making large purchases in the last 90 days is not an allowable expense. (or if you ordered it months ago and it’s not yet been received).
- An OPAR is required in ALL cases of requesting a change to an award and is submitted to ORPA by the department administrator.
- All changes to an existing award will be documented on the Notice of Award (NOA) issued by ORPA.
- Sponsor’s presumptions are that committed effort levels stay the same in an NCE period unless noted/requested otherwise at the time of the NCE request.
- Consider protocol expiration dates and any needs for extensions.
EXAMPLE #1: PI comes to you with an extension request

➢ When does the award end?
➢ Is there a current balance?

1. Run the Notice of Award (NOA) – have we requested an NCE Previously?
   • Who is the sponsor? What steps are needed for an NCE?
   • What is the current end date?
   • Are there subs or multiple Princeton PI’s on the award?
   • Are we expecting additional increments or is this really the end of the award?
   • You will find the sponsor award number, the AWD and sponsor contact information on this document as well.

2. Run the **Sponsored Project Summary** for the AWD – will have to include with your OPAR
   • Expense vs. Variance column for current balance – do not look at spendable balance – there may be encumbrances
Notice of Award

Princeton University
Notice of Award

<table>
<thead>
<tr>
<th>Award Specifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award Title:</td>
</tr>
<tr>
<td>Sponsor:</td>
</tr>
<tr>
<td>Primary Sponsor:</td>
</tr>
<tr>
<td>Award Type:</td>
</tr>
<tr>
<td>Purpose:</td>
</tr>
<tr>
<td>Award PI:</td>
</tr>
<tr>
<td>Award Department:</td>
</tr>
<tr>
<td>NOA Recipient:</td>
</tr>
<tr>
<td>ORPA Representative:</td>
</tr>
<tr>
<td>Preaward Date:</td>
</tr>
<tr>
<td>Status:</td>
</tr>
<tr>
<td>Award:</td>
</tr>
<tr>
<td>Sponsor Award Number:</td>
</tr>
<tr>
<td>External Proposal:</td>
</tr>
<tr>
<td>Start Date:</td>
</tr>
<tr>
<td>End Date:</td>
</tr>
<tr>
<td>Record Retention Date</td>
</tr>
</tbody>
</table>

Additional Award Details

<table>
<thead>
<tr>
<th>Attribute Type:</th>
<th>FFATA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uniform Guidance</td>
<td>12/26/2014</td>
</tr>
</tbody>
</table>

Project Attributes

<table>
<thead>
<tr>
<th>Project</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>[redacted]</td>
<td>Manufactured Equipment</td>
</tr>
</tbody>
</table>
Notice of Award

Modification Comments:
7/30/19 This NOA funds grant in the amount of [redacted]

IMPORTANT: SEE DURIP-SPECIFIC FUNDING USE REQUIREMENTS for allowable and non-allowable costs.

DURIP EQUIPMENT MUST BE ORDERED PROMPTLY
Equipment orders should be placed as quickly as practicable after you receive this award. It is expected that all equipment is in place by the end of the period of performance. If there are any delays, you must contact the Grants Officer at least 30 days before award expiration to negotiate a resolution.

3/12/20 This NOA extends the award end date to 5/14/2021 per MOD P00001.

2/8/21 This NOA extends the award end date to 5/14/2022 per MOD P00002.

2/16/22 This NOA extends the award end date to 5/14/23 with final reports due 8/12/23 per MOD P00003.
# Sponsored Project Summary

<table>
<thead>
<tr>
<th>Activity: 101 F&amp;A: 62.0% - MTDC 10/01/2021 - 09/30/2024 Active</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Sponsored</th>
<th>Current Period</th>
<th>Grant Year to Date Expense 10/22 - 2/23</th>
<th>Inception to Date Budget (A)</th>
<th>Inception to Date Expense (B)</th>
<th>Expense vs Budget Variance (C) = (A - B)</th>
<th>Encumbrance (D)</th>
<th>Spendable Balance (E) = (A - B - D)</th>
<th>% Available (F) = (E / A)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary-DOF Other Staffs</td>
<td>0.00</td>
<td>0.00</td>
<td>104,086.00</td>
<td>17,349.72</td>
<td>87,536.29</td>
<td>87,536.28</td>
<td>0.00</td>
<td>87,536.28</td>
</tr>
<tr>
<td>Total Salaries and Wages</td>
<td>0.00</td>
<td>0.00</td>
<td>104,086.00</td>
<td>17,349.72</td>
<td>87,536.29</td>
<td>87,536.28</td>
<td>0.00</td>
<td>87,536.28</td>
</tr>
<tr>
<td>Employee Benefits</td>
<td>0.00</td>
<td>0.00</td>
<td>37,976.00</td>
<td>6,159.16</td>
<td>31,816.84</td>
<td>31,816.84</td>
<td>0.00</td>
<td>31,816.84</td>
</tr>
<tr>
<td>Total Employee Benefits</td>
<td>0.00</td>
<td>0.00</td>
<td>37,976.00</td>
<td>6,159.16</td>
<td>31,816.84</td>
<td>31,816.84</td>
<td>0.00</td>
<td>31,816.84</td>
</tr>
<tr>
<td>Domestic Travel</td>
<td>0.00</td>
<td>62.50</td>
<td>6,999.00</td>
<td>541.23</td>
<td>6,457.77</td>
<td>6,457.77</td>
<td>0.00</td>
<td>6,457.77</td>
</tr>
<tr>
<td>International Travel</td>
<td>0.00</td>
<td>0.00</td>
<td>4,500.00</td>
<td>0.00</td>
<td>4,500.00</td>
<td>4,500.00</td>
<td>0.00</td>
<td>4,500.00</td>
</tr>
<tr>
<td>Total Travel and Entertainment</td>
<td>0.00</td>
<td>62.50</td>
<td>11,499.00</td>
<td>541.23</td>
<td>10,957.77</td>
<td>10,957.77</td>
<td>0.00</td>
<td>10,957.77</td>
</tr>
<tr>
<td>Modified Total Direct Costs</td>
<td>0.00</td>
<td>62.50</td>
<td>154,321.00</td>
<td>24,050.11</td>
<td>130,270.89</td>
<td>130,270.89</td>
<td>0.00</td>
<td>130,270.89</td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>0.00</td>
<td>62.50</td>
<td>154,321.00</td>
<td>24,050.11</td>
<td>130,270.89</td>
<td>130,270.89</td>
<td>0.00</td>
<td>130,270.89</td>
</tr>
<tr>
<td>F&amp;A Charge</td>
<td>0.00</td>
<td>38.75</td>
<td>95,679.00</td>
<td>14,911.05</td>
<td>80,767.94</td>
<td>80,767.94</td>
<td>0.00</td>
<td>80,767.94</td>
</tr>
<tr>
<td>F&amp;A Costs</td>
<td>0.00</td>
<td>38.75</td>
<td>95,679.00</td>
<td>14,911.05</td>
<td>80,767.94</td>
<td>80,767.94</td>
<td>0.00</td>
<td>80,767.94</td>
</tr>
<tr>
<td>Total Sponsored</td>
<td>0.00</td>
<td>101.25</td>
<td>250,000.00</td>
<td>38,961.17</td>
<td>211,038.83</td>
<td>211,038.83</td>
<td>0.00</td>
<td>211,038.83</td>
</tr>
<tr>
<td>Subtotal Activity 101</td>
<td>0.00</td>
<td>101.25</td>
<td>250,000.00</td>
<td>38,961.17</td>
<td>211,038.83</td>
<td>211,038.83</td>
<td>0.00</td>
<td>211,038.83</td>
</tr>
</tbody>
</table>

| |
| 0.00 | 101.25 | 250,000.00 | 38,961.17 | 211,038.83 | 211,038.83 | 84% |
EXAMPLE #1 - Continued: PI comes to you with an extension request

› When does the award end?
› Is there a current balance?

3. **Have your PI provide a justification for the extension**
   • Cannot indicate that the PI just wants to spend down the remaining balance.
   • Justification should be conclusive enough to easily be cut and pasted into a sponsor portal – does the justification make sense?

4. **Sometimes a PI may have already received written approval for the extension via email**
   • Obtain any backup regarding the extension request from your PI as applicable to include with the OPAR, but additional steps still may be needed to make an official extension request.
   • Always check your sponsor requirements.
EXAMPLE #2: You run Information Warehouse report and identify awards ending in the next 90 days with large balances.

- When does the award end?
- Is this award truly ending?

1. Run the Information Warehouse report for your PI – Award Management Summary
   - Under Obligated Period Ending Report: Select 180 or 90 days, depending on how far out you wish to review.
   - Project status: Open
   - Project Type: Should be Government & Non-Government (is default)
   - Scroll down and select the appropriate Project PI or run by your entire department.
     - You can schedule this report to come to your inbox weekly, monthly, etc.
   - RUN
EXAMPLE #2 - Continued: You run Information Warehouse report and identify awards ending in the next 90 days with balances.

1. When does it end?
2. Is this the actual expiration of the award?
3. Balance?
4. Encumbrances?

<table>
<thead>
<tr>
<th>Activity Start Date</th>
<th>Activity End Date</th>
<th>Anticipated Start Date</th>
<th>Anticipated End Date</th>
<th>Obligated Start Date</th>
<th>Obligated End Date</th>
<th>Obligated Amount</th>
<th>Grant Year to Date Expense</th>
<th>Total Anticipated Funding</th>
<th>Inception to Date Budget (A)</th>
<th>Inception to Date Expense (B)</th>
<th>Unencumbered Balance (C) = (A - B)</th>
<th>Encumbrance (D)</th>
<th>Spendable Balance (E) = (C - D)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fabrication</td>
<td>Project ends 4/30/2023</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Force Office of Scientific Research</td>
<td>05/15/2023</td>
<td>05/14/2023</td>
<td>05/15/2019</td>
<td>05/14/2019</td>
<td>487,200.00</td>
<td>487,200.00</td>
<td>487,200.00</td>
<td>22,441.64</td>
<td>467,200.00</td>
<td>228,777.94</td>
<td>258,422.06</td>
<td>0.00</td>
<td>258,422.06</td>
</tr>
<tr>
<td>Defense Advanced Research Projects Agency</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>999,906.00</td>
<td>999,906.00</td>
<td>999,906.00</td>
<td>295,016.00</td>
<td>516,702.00</td>
<td>470,046.33</td>
<td>45,832.67</td>
<td>43,409.50</td>
<td>2,333.00</td>
</tr>
<tr>
<td>Defense Advanced Research Projects Agency</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>04/09/2021</td>
<td>999,906.00</td>
<td>999,906.00</td>
<td>999,906.00</td>
<td>295,016.00</td>
<td>516,702.00</td>
<td>470,046.33</td>
<td>45,832.67</td>
<td>43,409.50</td>
<td>2,333.00</td>
</tr>
<tr>
<td>Massachusetts Institute of Technology</td>
<td>03/01/2022</td>
<td>02/28/2023</td>
<td>03/01/2022</td>
<td>02/28/2023</td>
<td>150,000.00</td>
<td>150,000.00</td>
<td>150,000.00</td>
<td>22,430.10</td>
<td>150,000.00</td>
<td>423,420.10</td>
<td>127,569.82</td>
<td>7,775.00</td>
<td>119,793.82</td>
</tr>
<tr>
<td>NSF - National Science Foundation</td>
<td>05/01/2022</td>
<td>04/30/2023</td>
<td>05/01/2022</td>
<td>04/30/2023</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>150,000.00</td>
</tr>
<tr>
<td>NSF - National Science Foundation</td>
<td>05/01/2022</td>
<td>04/30/2023</td>
<td>05/01/2022</td>
<td>04/30/2023</td>
<td>134,655.00</td>
<td>134,655.00</td>
<td>134,655.00</td>
<td>134,655.00</td>
<td>134,655.00</td>
<td>134,655.00</td>
<td>54,543.50</td>
<td>52,210.58</td>
<td>2,324.00</td>
</tr>
</tbody>
</table>
EXAMPLE #2 – Continued: You run Information Warehouse report and identify awards ending in the next 90 days with large balances.

- Most of these sample awards have balances and are closing in the next 90 days – verify all applicable charges have been made
  - All applicable salary allocated?
  - Are any journals outstanding from the holding account?
  - Are there outstanding Concur charges?
  - Are there stockroom fees that have not been charged?
  - Review details early with your PI to identify whether an extension would be the best course.
Preparing for Submitting an Extension

After discussing details with your PI, it is determined an extension is necessary.

Obtain a justification for the period of performance extension & how long of an extension is needed (does not always have to be 12 months, but 12 months may be automatic for some sponsors).

Verify whether this is the first extension on this award – depending on the sponsor, there are varying steps – see NOA Award Comments!

Verify whether there are subs, and do they also need an extension (do they have a balance – do not always have to extend a sub if their tasks are complete).
Preparing for Submitting an Extension

- Print out the **Sponsored Project Summary** – this is required for every extension request, showing the current balance as of today.

- Keep in mind an extension request may not always be possible – sponsors may have their own restrictions based on the source of their funding, and if this a 2nd or even 3rd extension, the funding may no longer be available for the sponsor to allocate.
  - Discussions with program managers/officers would be advisable during subsequent extension request depending on circumstances.

- **Always check sponsor requirements** – be proactive and stay ahead of award expiration dates. Delays in submissions may result in award closures and loss of remaining balance.
ORPA Prior Approval Request or OPAR

▷ All requests requiring sponsor review and/or approval, require an OPAR.
Sponsored Project Summary

Once you run the report – go to the top of your screen and select the arrow =

Run the report by PS Award Number to capture ALL projects on an award.

Provide this version of the PDF – do not just print to PDF from the screens you are sending, or uploading – the format will be off.
NSF: 1st No-Cost Extension

- Does **not** require prior approval
- NSF does not issue amendments for grantee-approved extensions
  - The revised end date can be viewed on research.gov
- 1st NCE must be submitted at least **10 days** before the project end date
  - Late submissions require justification and NSF approval NSF will not allow an NCE request more than 12 months out
- NCE requests can be initiated on research.gov by the department!
  - NCE requests will automatically be routed to ORPA for AOR sign off
  - Remember to send the **signed OPAR & SPS report** to your GCA
- NSF will not extend an award with a $0 balance
NSF: 1st No-Cost Extension
NSF: 1st No-Cost Extension

[Image of a form related to NSF grants, highlighting the process for preparing a new notification or request for a no-cost extension.]
NSF: 2\textsuperscript{nd} No-Cost Extension

- **Does** require prior approval
- The 2\textsuperscript{nd} NCE must be submitted at least **45 days** before the project end date
  - All late requests must include a strong justification as to why it was not submitted earlier
- 2\textsuperscript{nd} NCE requests can be initiated by the department, and routed to ORPA for AOR sign off
  - Remember to send the signed OPAR & SPS report to your GCA
- All 2\textsuperscript{nd} NCE requests require a justification, and a plan for use of obligated funds
- If approved, NSF will issue an amendment to the grant specifying the new end date
NSF: 2nd No-Cost Extension
NIH: 1st No Cost Extension

- Does **not** require prior approval*
- Can be requested for a period of up to 12 months
- Must be initiated and submitted by ORPA
  - Departments submit NCE request, including **signed OPAR & SPS report**, to GCA
  - GCA will submit the NCE request using the *eraCommons Status module*
- 1st NCE can be requested from **90 days** before the project end date until midnight of the project end date.
- Once submitted on eraCommons, an email notification is automatically sent to the grants management specialist.

*Prior approval is not required provided the NOA does not prohibit the extension, and the project’s approved scope will not change.
NIH: 1st No-Cost Extension

Status Result - General Search

Request One-time Project Extension

This Award is eligible to be extended for up to 1 year by monthly increments. Only an SO has the ability to perform a one-time project extension; after that, they must use Prior Approval for any additional extension requests.

Application Details

<table>
<thead>
<tr>
<th>Award Number</th>
<th>PD/PI Name(s)</th>
<th>Proposal Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>3R35GM126975-05</td>
<td>Sched, Paul D</td>
<td>Genetic regulatory mechanism in development and differentiation</td>
</tr>
</tbody>
</table>

Months For Extension

This will extend the project to 1/31/2024

You have selected to extend the period of performance of this award up to 12 months. By checking this box, you acknowledge you are notifying the awarding Agency of this one-time extension of the period of performance, you certify that the extension is not: 1) being exercised merely for the purpose of using unobligated balance, 2) prohibited by the terms and conditions of the Federal award, or 3) requesting additional Federal funds. Further, it does not involve any change in the approved objectives or scope of the project.

Office of Research and Project Administration
NIH: 2\textsuperscript{nd} No-Cost Extension

- \textbf{Does} require prior approval
- 2\textsuperscript{nd} NCE can be requested from \textbf{90 days} before the project end date until midnight of the project end date.
- Must be initiated and submitted by ORPA
  - 2\textsuperscript{nd} NCE is submitted using the \textit{Prior Approval} module on \textit{eraCommons}.
- Once submitted, an email notification is automatically sent to the grants management specialist.
- NIH will revise the project end date and send a confirmation to the grantee.
NIH: 2nd No-Cost Extension
Foundations

- Guidance Varies
- Always Check Sponsor Guidelines
- Check award letter/agreement (comes with your NOA)
Foundation Examples

Simons Foundation

- Unless stated otherwise in the award letter, grantees are permitted a one-time extension, without additional funding, for a period of up to twelve (12) months. A No-Cost Extension Progress Report web form is due thirty (30) days prior to the end date of the funding year.

- In rare circumstances, requests for additional time beyond the established expiration date of the first extension may be approved. A formal request for a No-Cost Extension beyond the first extension is due thirty (30) days prior to the end date of the first extension. To request approval, manually add and complete the No-Cost Extension Request web form in the Deliverables section of the award in pC.

- An approval notification will not be sent for the first automatically approved No-Cost Extension.

John Templeton Foundation

- For guidance on requesting an amendment, for example for a no-cost extension of this Agreement or a supplement, the Grantee should contact the Grantor.
Only the PI or GCA can submit an extension via the portal
Requires OPAR & SPS to GCA to initiate
AFOSR

- AFOSR no longer accepts NCE requests via email
  - All NCE requests must be submitted on this website by PI or AOR: [https://community.apan.org/wg/afosr/p/nce_request](https://community.apan.org/wg/afosr/p/nce_request)

- NCE’s must be submitted at least **30 days** prior to end of grant

- All required previous annual reports must be submitted before requesting an NCE

- Approval of the 1st NCE request is **not** automatic. AFOSR will share approval and updated award letter by email
  - Requests will be denied for insufficiently detailed justification statements and requests not submitted on Official University Letterheads

- 2nd NCE requests require a higher level approval and will likely be denied
Required documents/information for an NCE request include:

- Award /Grant #
- Original Start Date of Grant
- Original Proposed End Date of Grant
- New Proposed End Date of Grant
- Length of Extension (# of months)
- Name of Program Officer
- Justification (1,020 character limit)
- SF425 showing the unexpended funds remaining
- A request (on Princeton University Letterhead) signed by ORPA
Used the term **No Funds Extensions (NFE)**

Pay attention to the period of performance

- It is the Grantee’s responsibility to be aware of their grant’s Period of Performances (POP) and to contact their designated ONR Regional Administrative Office if they do not receive notification that the grant will be ending soon. Notification of grant expiration should be received from the ONR Regional Administrative Office 30 days before the end of the grant’s POP.

- Should be submitted 60 days in advance of an expiration, but no later than 14 days

- Must be sent to/acknowledged by the ONR Regional Administrative Office

  - Only the ACO can approve the request for NFE and modify the grant.

- Must provide what tasks have been completed and what tasks will be performed during the extension period.
The Administrative Office in Block 23a. of the ONR Award Form (NAVONR 4206) has the authority to issue an award modification that, without additional funds, extends the period of performance beyond the expiration date of this award as follows:

- i. An initial request for a period not to exceed 90 days; or
- ii. An initial or subsequent request for a period not to exceed 15 months in the aggregate beyond the original period of performance end date upon concurrence from the Technical Representative (Block 21 of the ONR Award Form (NAVONR 4206)).
Contacts

The email address listed in 23a is the official way the extension must be requested.

<table>
<thead>
<tr>
<th>20b. TELEPHONE NUMBER:</th>
<th>20c. EMAIL ADDRESS:</th>
<th>21d. TELEPHONE NUMBER:</th>
<th>21e. EMAIL ADDRESS:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td><a href="mailto:KEVIN.R.LEONARD@NAVY.MIL">KEVIN.R.LEONARD@NAVY.MIL</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>22a. NAME: VERONICA Y LACEY</th>
<th>22b. CODE: 0253</th>
<th>23a. ADMINISTRATIVE OFFICE: ONR REG Office Boston</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office of Naval Research</td>
<td></td>
<td>Telephone: (617) 753-4004</td>
</tr>
<tr>
<td>875 N. Randolph Street Suite 1425</td>
<td></td>
<td>Email: <a href="mailto:ONR_Boston@navy.mil">ONR_Boston@navy.mil</a></td>
</tr>
<tr>
<td>Arlington VA 22203-1995</td>
<td></td>
<td>495 Summer Street, Room 627</td>
</tr>
<tr>
<td>703-696-2593</td>
<td><a href="mailto:VERONICA.LACEY@NAVY.MIL">VERONICA.LACEY@NAVY.MIL</a></td>
<td>BOSTON MA 02210-2109</td>
</tr>
</tbody>
</table>
Relies on the [Grant Terms and Conditions | Office of Naval Research (navy.mil)](navy.mil)

Initiation of no cost extensions:
- must be submitted 30 days prior to the award end date
- must be in writing to the sponsor’s Grants Officer
- PI request must provide the following information
  - revised end date (not to exceed a 12 month period)
  - estimate of award balance with brief budget justification
  - description of remaining scope of work
  - justification for the extension
Industry Extension

- All Industry Agreements are different
  - Extension language should include the reason that more time is needed
    - Context is important for many industry sponsors who may not be used to these types of requests
  - Extension language should be mindful of the type of contract!
    - Gift-like
    - Cost-reimbursable
    - Scheduled Payments
    - Fixed Price (to be discussed on a later slide)

- The details make a difference!
Industry Extension

Keep in mind with Industry federal flow through contracts, the industry sponsor may need to first request the NCE from their prime contractor before one is granted to us. Account for this with your request timeline.

Be mindful of incurring expenses after the end date, prior to getting the executed modification:

- Clause Example: *The Buyer shall not be obligated to reimburse the Subcontractor for any work performed or charges incurred before or after this time period, unless agreed to in writing by the Buyer’s designated Subcontract Representative.*

The sponsor always retains the right to say “no.” Examples of reasons to say no might include:

- An extension may not be granted solely because there is money left over. Programmatic benefit must be justified
- Funding may have come from a prior year’s appropriation and cannot be extended
- The amount requested in the extension request appears excessive to the sponsor
DARPA – See Agreement

- DARPA awards funds through other DOD agencies and Defense Contractors as grant/cooperative agreements & contracts
  - Agency Specific terms need to be checked for extension information
  - Contractor terms matter
  - Any extension to the period of performance typically requires written prior approval by the Administrative Grants Officer or Grants Officer for the award
- DARPA also awards funding via Other Transaction Agreements (OTAs)
  - Milestone based fixed price awards (to be discussed on a later slide)
Fixed Price Extensions

- Fixed Price awards are structured differently than a cost reimbursable grant.
- Payments are based off deliverables set forth in the contract.
- Scenarios you may find near the end of a project:
  - Need more time to complete deliverables
    - Review submitted deliverables, payments and determine from the PI the amount of time needed
    - Request extra time needed to complete outstanding deliverable
  - Need more time and funding to complete deliverables
    - The extra costs are the responsibility of the PI
    - Request extra time to complete a deliverable(s)
  - PI completed all deliverables, we are fully paid for the work and funding remains
    - Provide required detail to request the use of the residual funding via OPAR (policy in process)
      - All work was completed.
      - All required deliverables were submitted and/or accepted by the sponsor.
      - All expenditures are in accordance with the terms and conditions of the agreement and the approved project budget.
      - All applicable expenditures have been charged to the award and none remain outstanding.
Subawards & NCE’s

NO COST EXTENSIONS – ACTION REQUIRED

After OPAR submitted and approved and NOA received
Prepare NCE for subaward(s)

1. **Determine if Sub needs an extension**
   - There should be funds left
   - There should be additional sow or publication to be completed
   - Does the sub need the full or partial extension period

**NOTE:** Can’t extend just to spend out remaining funds or pay for equipment at end of the award/subaward
2. CREATE Amendment record in ERA

(i) Go to the original ERA number (record) and use the “create amendment” activity

ERA Training Manual on ORPA website – Amendments Section 4.2 – Pg. 38
3. ATTACH subaward amendment form to the ERA request
   (i) Include revised subaward end date
   (ii) IRB/IACUC – attach revised approval, if applicable

NOTE: Does the sub need additional funding during NCE – contact subs team
ORPA Website Sponsor Information

- New Sponsor Pages, with extension information
- FDP Prior approval matrix link now available!

Routing No Funds Extensions (NFE)

- Be aware of your awards period-of-performance (POP).
- Requests for extensions should be submitted to ONR 60 days in advance and no later than 14 days in advance of the POP expiration date. Date of NFE submission is based on acknowledgement of submission by the ONR Regional Administrative Office. Only the ACO can approve the request for NFE and modify the grant.
- If you did NOT receive an email notification from the ONR Regional Administrative Office, email the NFE request to the ONR Regional Administrative Office identified in block 23.a. of the grant.