No-Cost Extensions (NCEs) Webinar

September 19, 2024

Connecting Minority Communities (CMC) Pilot Program



DISCLAIMER

This resource is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the specific requirements set forth in program Notice of Funding Opportunities (NOFO), existing Department of Commerce (DOC) Grants and Cooperative Agreements Manual (Grants Manual) requirements, or other Departmental Administrative Orders (DAOs) and Federal Circulars. Similarly, this guidance document does not supersede or supplement National Institute of Standards and Technology (NIST) or National Oceanic and Atmospheric Administration (NOAA) Grants Management Division (GMD) policies and procedures related to their work on financial assistance awards.

In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this guidance.

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Overview of AARs

Award Action Requests (AARs) = Unfunded Grant Actions (UGAs) = Prior Approvals

- An AAR is the mechanism a recipient uses to propose a change to their award. An AAR submission prompts the Grants Officer (GO) to amend an award, with approval provided through a CD-451 form or a Non-Funded Administrative Change Letter; which documents the approved amendment to the Financial Award (CD-450).
- Department of Commerce (DOC) awards can only be amended, changed or modified by the assigned National
 Institute of Standards and Technology (NIST) Grants Management Division (GMD) GO
- AARs include, but are not limited to:





Changes in Scope



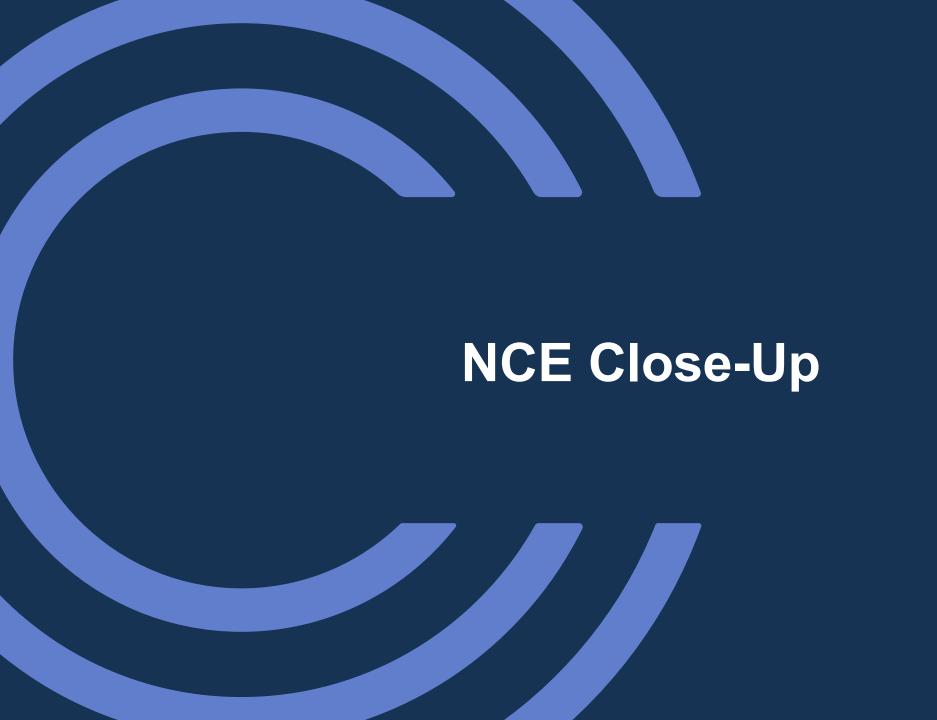
Subrecipient Changes



Changes in Key Personnel



Budget Modifications



No-Cost Extension

A **No-Cost Extension** AAR **extends a project's period of performance** without granting additional funds. An extension may only be granted if permissible under the program's statutory authorization, and certain extensions require the approval of the NTIA Administrator. For example:



Due to supply chain issues, the shipment of the devices (or equipment) purchased by the recipient has been delayed for 9 months, postponing the implementation of the project.



Due to an unexpected hiring freeze that lasted 6 months, the recipient has not been able to hire sufficient project staff to support the project, therefore delaying implementation.

No-Cost Extension: Program-Specific Guidance



CMC

The eligible recipient may submit a request for an extension no later than **ninety (90)** calendar days before the end of the award period.

No-Cost Extension: Program-Specific Guidance continued...

Requirements for submission of a No-Cost Extension AAR (as listed in the NOFO):

For CMC, the eligible recipient must certify within the AAR submission that:

- They have a plan for use of the grant funds;
- The execution or implementation of the project is underway; and/or
- Extenuating circumstances require an extension of time to allow the project to be completed.

No-cost extensions should be reviewed in-line with your program-specific NOFO, Specific Award Conditions (SACs) and the DOC Financial Assistance Standard Terms and Conditions.

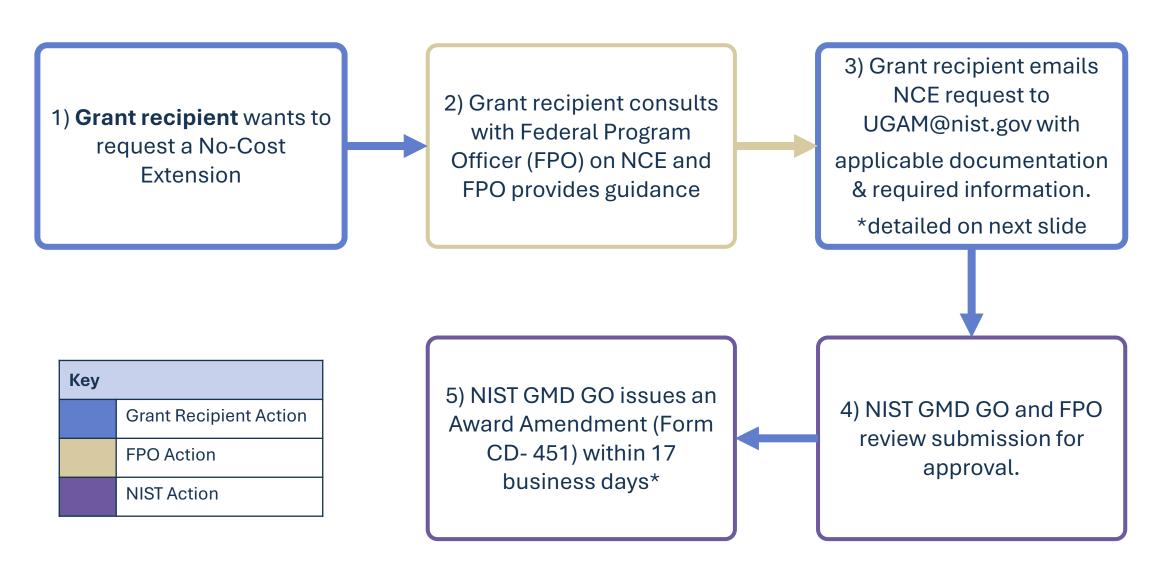
NIST Required Documents

Under DOC rules, No-Cost Extensions result in an **Award Amendment (CD-451)** if the AAR is approved:

AAR Type	Description	Required Documents to Update & Submit
No-cost extensions	A no-cost extension is an amendment that extends a project's period of performance (PoP) without granting additional funds. No-cost extensions do not change the original award amount, do not permit recipients to perform activities that are not described in the approved project narrative, and may not be exercised merely to utilize unliquidated balances.	 A detailed explanation of why the project could not be completed by the approved end date Description of the project activities that require support during the extension Revised period of performance An OMB-Approved Budget Form (SF-424C for construction programs; SF-424A for non-construction programs) and a detailed budget narrative broken out by cost category for the balance of funds to be carried over into the extended project period NCE request signed by the Authorizing Official Certification for extension per requirement in the NOFO



NCE Process



Recipient Email Submission to UGAM (Step 3 in AAR Process)

- The Authorized Organizational Representative (AOR) is responsible for formally submitting the AAR.
- Send your AAR to <u>UGAM@nist.gov</u> with your FPO copied (cc'd).
- The email subject line must include the following:
 - Recipient Name
 - Award Number
 - Authorized Organizational Representative (AOR) or Principal Investigator/Project Director
 - Action being requested (e.g., no-cost extension, change in key personnel, etc.)
- The email body must contain your request and supporting documentation and related correspondence, including justification to support the request.
- Attach the required documents for the AAR type being requested to the email.



AARs Resources

Below are the current AAR resources available for NTIA recipients, by program.

- Program Recipient Handbook
 - o CMC
- Notice of Funding Opportunity (NOFO)
 - o CMC NOFO
- SACs within your CD-450 under "Prior Approvals"
- eCFR: 2 CFR § 200.308 -- Revision of budget and program plans.
- Department of Commerce (DOC) Financial Assistance Standard Terms and Conditions





THANK YOU

Connecting Minority Communities (CMC) Pilot Program: cmc@ntia.gov