Period of Performance Extension Guidance All Grant Programs

- Requests for period of performance (no cost) extensions are reviewed on an individual basis.
- Requests may require Program Office concurrence. Please see Section 4 of the Grantee Handbook: Staff Edition for additional details.
- Generally, Administrators/Grant Officers will view most favorably extension requests from grantees that are making reasonable progress on their projects or have successfully implemented their programs, met enrollment and entered training goals, but need additional time to focus on training completions and job placement. Administrators/Grant Officers will consider all factors and circumstances that led to the extension request and will make decisions in the best interest of the government. The following criteria will be used in consideration of extension requests:
 - 1. Must fully justify the reason why more time is needed and describe the:
 - circumstances, challenges, or problems that created the need to extend the period of performance and list the remaining funds to be expended;
 - efforts to address the challenges and the corrective actions or changes that have or are being made to assure grant success;
 - activities that can be accomplished by the original grant period of performance; and
 - the specific activities that will be accomplished in the extended period of performance, including an updated timeline of grant activities, outcomes and deliverables that will be achieved, and an updated budget (SF424a) with a detailed budget narrative, if a budget realignment is necessary.
 - 2. Should not occur during the first two-thirds of the original performance period (for example: first/second year of a 3-year performance period of the grant). This requirement does not prevent grantees from informing the FPO of delays as they occur early in the grant. Any known delays should be documented by the FPO in GMS with possible solutions and efforts to minimize them.
 - **3.** Must be signed by the Authorized Representative of the grant.
- Unless the grant program is funded a) incrementally or b) with no-year (H-1B) or Unemployment Insurance (UI) supplemental budget grants to state consortia for system modernization projects¹, or c) other formula programs, extension approvals should not

¹ UI grants to state consortia for system modernization projects have a six-year life.

exceed a period of performance totaling four years. Most appropriated funds have a five-year life; therefore, a four-year period of performance will allow sufficient time for closeout to occur prior to the funds expiring. Any requests (except incrementally funded awards) exceeding a four year period of performance must be authorized by the Office of Budget, the Closeout Grant Officer and the OGM Division Chief. If in doubt of the life of the funds, contact the Budget Office for assistance. No grant may be extended beyond the life of the funds.

- Approvals must be lawful, reasonable, necessary, and in the best interest of the government. The strength of the overall "plan" (i.e. modification) should be analyzed and taken into account when determining if approval is warranted, as well as any extenuating circumstances that have occurred. Examples of circumstances which merit extension include, but are not limited to: UI information technology or state consortia system modernization projects that have demonstrated progress and have the potential for successful completion within the extended period, continuation of services to existing participants which will result in improved outcomes for these participants such as increasing job placements or completing a curriculum, which work towards achieving or surpassing the original work plan goals.
- Generally, requests are <u>unlikely to be approved if</u>:
 - 1. major new activities are introduced;
 - 2. proposed new enrollment of additional participants is proposed, unless the participants can fully complete all aspects of the original training program, earn credentials and have a high likelihood of job placement (for unemployed workers) by the proposed new end date or the grantee has a strong plan with evidence that outcomes will be achieved for any participants completing the training after the end date of the grant (i.e. leveraging training costs through Pell, WIOA, etc.);
 - 3. the primary purpose of the grant is for capacity building;
 - **4.** purpose is largely to spend out the remaining balance;
 - 5. the purpose is to acquire additional equipment, not already authorized;
 - **6.** the requested extension is more than 12 months:
 - 7. the funds remaining on the grant have less than a year before they expire (example: in months 48through 60 for a 5-year (60-month grant). Closeout activities need to be completed while funds are active to ensure grantees can be reimbursed for costs incurred during the grant period;
 - **8.** the grantee has been non-responsive to technical assistance or not provided documentation as requested by ETA (revised timelines, budget re-alignment/narrative etc.) in order for the grant to be successful;
 - **9.** the grantee has shown a lack of effort, is lagging behind in the operation of the grant and has not provided adequate information concerning:
 - circumstances, challenges, or problems that has created the need to extend the period of performance and listing the remaining funds to be expended;
 - efforts to address the challenges and the corrective actions or changes that have or are being made to assure success;

- activities that can be accomplished by the original grant period of performance; and
- the specific activities that will be accomplished in the extended period of performance, including an updated timeline of grant activities, outcomes and deliverables that will be achieved and an updated budget (SF424a) with a detailed budget narrative;
- 10. the grantee has already received a period of performance extension; and
- 11. the request for an extension was received too late in the grant period of performance to review and process. The Department of Labor exceptions at 2 CFR 2900.10 requires grantees to submit a request 30 days prior to the expiration date.

• A complete request for an extension includes the following:

- 1. request by the authorized representative for the grantee;
- 2. narrative describing the reason/justification for the request. For UI projects, the narrative must include a revised project plan listing all key activities with original (previously approved) begin/end dates, and proposed begin/end dates, and percent (%) complete for each key activity;
- 3. SF-424A and narrative, if a budget re-alignment is necessary; and
- **4.** updated outcomes benchmarked within the new timeframe as outlined below.

Key Outcomes	Total Planned	Total if the Grant Ends As Scheduled*	Activity Within the Extended POP*	New Totals*
1. Participants Enrolled				
2. Begin Education/Training				
3. Completed Education/Training				
3. Attained a Credential				
4. Entered Employment				
5. Expenditures				

*Projected