## **No-Cost Extension Requests**



#### No-Cost Extension Details from the NOFO (page 8)

#### **B.** Period of Performance

To be eligible to obtain a middle mile grant, an eligible entity shall agree to complete the buildout of the middle mile infrastructure described in the application by not later than five (5) years after the date on which amounts from the grant are made available to the eligible entity.

#### 1. Extensions

An eligible entity may submit a request for an extension, which must include the justification for such an extension and all relevant circumstances. At the request of an eligible entity, the Assistant Secretary may extend the buildout deadline by not more than one (1) year if the eligible entity certifies that:

- (i) the eligible entity has a plan for use of the grant funds;
- (ii) the project to build out middle mile infrastructure is underway; or
- (iii) extenuating circumstances require an extension of time to allow completion of the project to build out middle mile infrastructure.

Requests for extensions will be granted at the sole discretion of the Assistant Secretary. If an extension is granted, the Assistant Secretary shall modify any milestones as necessary under the extension.

NTIA's Grants Management & Compliance Group (GMAC) recently concluded that any grant with an original award period of less than 5 years may request a No-Cost Extension up to a total of a 5-year award period.

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.

#### **No-Cost Extension Process**

• Grant recipient notifies their assigned FPO they desire a No-Cost Extension as soon as identified • Grant recipient submits the required materials to FPO – draft requests are due between 120-90 days before end of current award period ends • After preliminary approval from FPO, grant recipient submits to Unfunded Grant Action Mailbox (UGAM) • FPO drafts a No-Cost Extension memo • FPO submits the memo to the Program Director • Program Director finalizes the memo and submits to NTIA Associate Administrator for review • Associate Administrator reviews memo and provides recommendation to program office • NIST conducts final review and formalizes approval/rejection of No-Cost Extension request

### **No-Cost Extension Request Requirements**

Before submitting a No-Cost Extension Request, grant recipients are required to demonstrate:



They have a plan for the use of the grant funds.



The execution or implementation of the project is underway.



Extenuating circumstances require an extension of time to allow the project to be completed.

Note: Unspent funds are not sufficient justification for a No-Cost Extension.

#### **No-Cost Extension**

A **No-Cost Extension Requests** extends a project's period of performance without granting additional federal 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:

- The time to satisfy the NEPA requirements of the MM program took longer than originally planned.
- The time to obtain the necessary permits took longer than planned.
- The time to receive project materials have been delayed due to supply chain issues.
- External construction resources were not readily available to meet the overall timeline of the project.

## **No-Cost Extension: The Expected Timing of Events**

Prior to 120 days remaining in the current award period, grantee begins discussions with NTIA FPO and NIST Grants Specialist.

Between 120 days & 90 days before the end of current award period, the grantee submits a draft request & required, supporting documentation Once the FPO provides preliminary approval of the draft request, grantees should promptly submit its formal request to the UGAM@nist.gov email account

The NIST Grants Office will review the request, seek clarifying information if necessary and issue an award amendment (CD-451) formally approving the new end date

#### **No-Cost Extension: Required Documentation**

- An explanation of the recipient's inability to complete work by the specified date (e.g., a lengthy period of unusual weather delayed the contractor's ability to excavate the site; major re-engineering required to obtain Federal or state approvals; unplanned environmental mitigation required).
- A statement that no other changes to the project are contemplated;
- A budget for the remaining funds (use the same budget format was used in application budget narrative and detailed project budget)
- A copy of the most recent audit submitted the Federal Audit Clearinghouse (FAC) or a copy of the most recent program-specific provided to the NIST Grants Office. If the audit requirements have not been triggered to date, a copy of the most recently audited financial statements.
- A statement, supported by documentation where appropriate, demonstrating there is still a bona fide need for the project; and
- A statement that no further delay is reasonably anticipated and that the project can be completed within the revised time schedule.
- The latest version of a sufficiently detailed project plan demonstrating the relationship between time and activities to complete the approved scope of the project within the extension of the award period.

# No-Cost Extension Requests Q & A