

FY 2024 AmeriCorps Grant No-Cost Extensions

No-cost extensions are an extension of time that do not require the obligation of additional Federal funds. No-cost extensions allow grantees to complete grant activities and/or for members to complete service.

Based on increased clarity to 2 CFR § 200.308 in the recent update to the <u>Uniform Guidance</u>, as published on April 22, 2024, the "parameters for no-cost extensions are at the discretion of the agency."

AmeriCorps is setting an 18-month limit for the no-cost extension period to extend flexibility without increasing risk and burden.

The following parameters remain:

- 1. Member enrollment periods for National Direct and Native Nations grants and State Commission subgrants cannot exceed 12 months.
- 2. No additional funds can be awarded during a no-cost extension period.

The following FAQs clarify these parameters through specific situations:

1. Is program activity that is otherwise within the scope of an awarded grant restricted when that grant is in a no-cost extension? Specifically, will AmeriCorps allow new subgrants and new planning grants on a Formula prime that is in a no-cost extension period?

All activities that are within the scope of an award prior to the issuance of a no-cost extension remain permissible within the period of a no-cost extension. Specifically, starting in program year 2024-25, AmeriCorps will allow new subgrants and new planning grants on a Formula prime that is in a no-cost extension period. Additionally, State Commissions may add new subgrants and planning grants to FY 2023 programs using ARP Formula Funds per Option 1 of the FY 2024 Formula Guidance.

2. Can a State Commission add a new competitive project to a prime during a no-cost extension?

No. Adding new subgrants and/or planning grants with no new funds is restricted to formula grants only.

3. Can no-cost extension periods exceed 18 months?

No-cost extensions must not be longer than needed to complete program activities, or 18 months, whichever is shorter.

3. May new members be enrolled during a no-cost extension?

Yes, starting in program year 2024-25, new members may be enrolled into a program during a no-cost extension if the member enrollment period has not expired. The member term of service must conclude by the end of the no-cost



extension period. Grantees may enroll new members during the entire member enrollment period, including on the last day, as long as the member terms of service concludes before the end date of the grant.

The member living allowance requirements and Education Award amounts are tied to the terms and conditions and Notice of Funding Opportunity that aligns with the most recently awarded member enrollment period.

4. What if members need additional time to complete service beyond the approved no-cost extension?

No-cost extensions for members to complete service that extend the budget more than 18 months beyond the original three-year period of performance will not be approved. Member term of service end dates and maximum suspension duration must be set within the approved budget period end date. Suspended members who cannot complete their terms of service by the approved budget end date will need to be exited early.

5. Can additional funds be awarded during a no-cost extension?

No new obligations of funds from AmeriCorps can occur during a no-cost extension. State Commissions may subgrant funds already awarded to the prime during a no-cost extension.

6. Can additional member slots be awarded during a no-cost extension?

Yes, grantees may request no-cost slots. To request no-cost slots, submit a written request for the additional no-cost slots and MSYs, providing the applicable subgrantee information and certifications, to your Portfolio Manager. See #4 above for parameters for enrolling new members during a no-cost extension.

7. Can a State Commission approve a no-cost extension for a subgrantee without AmeriCorps approval?

Yes, a State Commission can approve a no-cost extension for a subgrantee following the Commission's policies and procedures. The new subgrantee end date must be within the Commission's approved end date and the subgrantee's member enrollment period cannot be more than 12 months.

8. Can a placeholder subgrant continue during a no-cost extension?

A placeholder subgrant can receive a no-cost extension and it can also continue during the prime's no-cost extension; however, those funds will not carryforward into a new prime grant.

9. Can funds be moved from one Formula prime to another prime that is in a nocost extension?

Because moving funds across primes involves the deobligation and reobligation of funds by AmeriCorps, and no financial obligations are allowed for a grant that is



in a no-cost extension period, funds cannot be moved to a prime that is in a no-cost extension. See 2024 Formula Guidance for specific parameters regarding the transfer of funds across primes for grants that are not in a no-cost extension.

10. Is it permissible to move ARP funds awarded on the Formula Prime to a subgrantee on that same Formula Prime during the Formula Prime no-cost extension period?

Yes, State Commissions may move ARP funds already awarded on the Formula prime to a subgrantee on that grant in a no-cost extension period, not to exceed the FY 2024 program year. This move is permissible because the ARP funds have already been obligated to the Formula Prime and no new/additional funds will be awarded. In summary, although funds cannot be obligated to a grant in a no-cost extension, they can be sub-awarded from a grant in a no-cost extension.

11. Is the ARP Formula Prime eligible for a no-cost extension?

The ARP Formula Prime is not eligible for a no-cost extension.

12. Can a State Commission award ARP multi-year funding to a subgrantee during a no-cost extension?

State Commissions may not use ARP funding to award multi-year funding to subgrants because this would extend the awarding of ARP funds past the 2024 program year limit. Awarding ARP Formula funds is limited to 2021, 2022, 2023, and 2024 program years only.

13. When should a no-cost extension be requested?

A no cost extension should be requested as soon as the grantee becomes aware of the need for such an extension and can reasonably anticipate the required duration of the no-cost extension. The request must be received at least 30 calendar days before the period of performance end date.

If the grantee is requesting no-cost slots, additional time may be needed.

14. What accounting considerations are there for no-cost extensions?

When a grantee receives a new grant while another grant is in a no-cost extension, the grantee must carefully account for each grant's costs and programmatic activity separately. Staff time and member costs must be properly allocated. See the Funds Management Training, accessible via the Manage Your Grant webpage, for more information.

15. Does the guidance in this document apply to all AmeriCorps grant programs? Yes, aside from all AmeriCorps State and National member-specific and subgrant parameters, this guidance applies to all grant programs.