



FACT SHEET

PERIOD OF PERFORMANCE & OBLIGATING FUNDS

B&GM

BUDGET & GRANTS MANAGEMENT

As a pass-through entity for Federal Education funds, the Nebraska Department of Education (NDE) is providing this fact sheet to assist Federal program subrecipients.

This information is being provided by the NDE as general compliance guidance only. Subrecipients of Federal funds should refer to the full text of the regulations which can be found at [Electronic Code of Federal Regulations](#) when developing and implementing policies.

Requirements for Period of Performance & Obligation

2 CFR 200 is the guiding policy for all federal grants and recipients of federal program funds are required to comply. Please review [2 CFR part 200, Subpart E](#) for guidance. Federal funds must be expended during the period of performance. Funds cannot be obligated before or after the period of performance.

Example: Do not sign into a contract before you awarded the grant obligating those grant funds and/or before you awarded the funds. Do not sign into a contract that runs 3 years, because the last 2 years would be outside of the grants period.

Period of performance: The time interval between the start and end date of a federal award, which may include one or more budget periods. Identification of the period of performance in the Federal award consistent with § 200.211(b)(5) does not commit the Federal agency to fund the award beyond the currently approved budget period.

Example: Federal grant runs from September 1, 2023, thru August 31, 2024. All funds must be expended during this time frame or is considered unliquidated financial obligations. Note: You also have 90 days to liquidate funds after August 31.

Unliquidated financial obligations are financial obligations incurred by the recipient or subrecipient but not paid (liquidated) for financial reports prepared on a cash basis. For reports prepared on an accrual basis, these are financial obligations incurred by the recipient or subrecipient but for which expenditures have not been recorded per [2 CFR 200.1](#). The following table shows when a State or a subgrantee makes obligations for various kinds of property and services per [34 CFR 76.707](#).

If the obligation is for—	The obligation is made—
Acquisition of real or personal property	On the date on which the State or subgrantee makes a binding written commitment to acquire the property.
Personal services by an employee of the State or subgrantee	When the services are performed.
Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the State or subgrantee makes a binding written commitment to obtain the services.
Performance of work other than personal services	On the date on which the State or subgrantee makes a binding written commitment to obtain the work.
Public utility services	When the State or subgrantee receives the services.
Travel	When the travel is taken.
Rental of real or personal property	When the State or subgrantee uses the property.
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR 200	On the first day of the grant or subgrant performance period.



Federal Compliance Monitoring

As part of NDE's annual Federal Compliance Monitoring program, NDE staff will review agency policy and procedure records. Grant Compliance Auditors will conduct these reviews using the requirements outlined in 2 CFR Part 200, along with other applicable federal regulations and guidelines.

Federal Guidance

- [Grants Management Fiscal Monitoring Webpage](#)
- [Federal Register Uniform Guidance](#)
- [Uniform Guidance 2 CFR 200 FAQs](#)
- [2 CFR Revision Redline](#)

Technical Assistance

Any questions relative to the contents of this document, please email: nde.bgmhelp@nebraska.gov.

This document is not a substitute for the advice of your own attorney and/or law firm licensed to practice law in the state of Nebraska. In reading and applying Federal law, the NDE recommends LEAs seek and obtain the advice of counsel with questions of application, interpretation, and/or to ensure that use of this information is appropriate to your particular situation.

