

09-26 Extending PIP awards for administrative reasons

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INTRODUCTION

1. This Memo provides guidance on the Universal Credit, Personal Independence Payment, Jobseeker's Allowance and Employment and Support Allowance (Decisions and Appeals) (Amendment) Regulations 2026¹.

1 [UC \(D&A\) Amend Regs 2026](#)

2. The regulations introduce a new ground to supersede a PIP award so as to extend its length. The new power comes into force on 02.06.26. It can be used from that date.

THE NEW GROUND OF SUPERSESSION

3. The new ground of supersession provides that the length of a fixed-term award of PIP may be extended where the Secretary of State considers that this is necessary to safeguard the efficient administration of PIP¹.

1 [UC, PIP, JSA & ESA \(D&A\) Regs, reg 22A](#)

SAFEGUARDING THE EFFICIENT ADMINISTRATION OF PIP

4. The efficient administration of PIP will be threatened where circumstances prevent the Department from reviewing fixed-term awards before they expire in a safe, effective and timely way. Such circumstances may include:

4.1 national emergencies, such as

4.1.1 war or

4.1.2 health crises or

4.2 more specific administrative difficulties, such as

4.2.1 system outage or

4.2.2 serious resource limitations or

4.2.3 serious backlogs

Note: This list is not exhaustive.

THE SUPERSESSION

5. When a decision is superseded, the original decision can only be altered in a way that follows from the ground of supersession¹. This means that a supersession under the new power:

5.1 should extend the length of the award by a period that will allow the threat to the efficient administration of PIP to be eased and

5.2 cannot alter the amount of the award.

¹ [R\(IB\) 2/04, para 10\(4\)](#)

THE EFFECTIVE DATE OF THE SUPERSESSION

6. The date from which an extension under the new power takes effect is not specified in the regulations, Accordingly, it will take effect from:

6.1 the date on which the decision to extend is made or

6.2 the date of any application for an extension by the claimant¹.

[1 SS Act 98, sec 10\(5\)](#)

APPLICATIONS FOR AN EXTENSION

7. The new power is not restricted to decisions on the DM's initiative. In principle, it is open to a claimant to request a supersession under it. There is no time limit for an application on this ground. However, the burden of proof is on the claimant. The DM should only supersede under the new power if they are satisfied that the available evidence suggests that an extension to the claimant's award is required to safeguard the efficient administration of PIP.

8. If an application discloses no reason to extend the length of an award under the new power but suggests that an extension may be appropriate on another ground (see paras 9-10 below), the DM should also consider that other ground.

OTHER POWERS TO EXTEND

9. The length of an award of PIP can also be extended by a supersession on the basis of:

9.1 a change of circumstances¹ or

9.2 a new HCP report² or

9.3 previously unrecognized facts that existed when the original award was made and would have

warranted a longer award³.

1 [UC, PIP, JSA & ESA \(D&A\) Regs, reg 23\(1\)\(a\) & R\(IB\) 2/04](#), para 152(d); 2 [reg 26\(1\)\(a\)](#); 3 [reg 24\(a\)](#)

10. The new power to extend the length of an award to safeguard the efficient administration of PIP has not replaced or changed these options. It is an addition to them.

NOTIFICATION, MANDATORY RECONSIDERATION AND APPEAL

11. A decision to extend or not extend the period of an award under the new power:

11.1 must be notified to the claimant or appointee in the usual way; and

11.2 may be disputed by way of an application for mandatory reconsideration; and

11.3 may be appealed after mandatory reconsideration has been completed.

12. On appeal:

12.1 The FtT must deal with the case as if it is standing in the shoes of the DM on the date the decision under appeal was made¹. It must reconsider for itself whether it is necessary to extend the period of the appellant's award to safeguard the efficient administration of PIP (and if it is, what the appropriate period of extension is). The response to an appeal should, therefore, set out the DM's views on these matters.

12.2 The FtT cannot use the new power to change the amount of the award.

12.3 The FtT can consider whether, at the date of the decision under appeal, an alternative ground to supersede the period or the amount of the award was satisfied.

1 [R\(IB\) 2/04](#), paras 19-35; [R\(IS\) 17/04](#), para 26 and [\(1\) TR \(2\) GD v Secretary of State for Work and Pensions \(PIP, ESA\) \[2025\] UKUT 332 \(AAC\)](#), paras 55 & 121.e.ii

ANNOTATIONS

Please annotate this Memo at the side of [A4013](#) and the heading 'Special rules – PIP' before [A4530](#).

CONTACTS

If you have any queries about this memo, please write to Decision Making and Appeals (DMA) Leeds, 3E zone E, Quarry House, Leeds. Existing arrangements for such referrals should be followed, as set out in – Memo 7/19 Requesting case guidance from DMA Leeds for all benefits.

DMA Leeds: May 2026