



National Aeronautics and  
Space Administration  
Washington, DC 20546

## Grant Information Circular

GIC 20-07

November 12, 2020

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**PURPOSE:** To inform NASA programs, Grant Officers, and Technical Officers that the NASA Grant and Cooperative Agreement Manual (GCAM) has been revised to reflect the Office of Management and Budget's (OMB) revisions to Title 2 of the Code of Federal Regulations (2 CFR). The revised GCAM will apply to all new awards and amended awards issued on or after November 12, 2020. The revised GCAM will be made publicly available on the Grants Policy and Compliance Branch [website](#).

**BACKGROUND:** On August 13, 2020, the OMB published [revisions](#) to the following parts of 2 CFR in the Federal Register:

- 2 CFR Part 25: Universal Identifier and System for Award Management,
- 2 CFR Part 170: Reporting Subaward and Executive Compensation Information,
- 2 CFR Part 183: Never Contract with the Enemy, and
- 2 CFR Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

The OMB's revisions to 2 CFR reflect a foundational shift outlined in the President's Management Agenda to set the stage for enhanced results-oriented accountability for grants and cooperative agreements. To reflect these revisions, the Grants Policy and Compliance Branch (GPC) in the Office of the Chief Financial Officer has updated the GCAM accordingly. Furthermore, GPC has made revisions to the GCAM that are unrelated to the 2 CFR revisions in an effort to clarify and improve existing policy. Appendix A of this GIC includes a crosswalk that outlines the major revisions to the GCAM and where they can be found in the document.

Additionally, as required by 2 CFR 200.106, Agency implementation, GPC has updated 2 CFR 1800 to codify NASA's implementation of 2 CFR 200. The updates to 2 CFR 1800 have been posted to the [Federal Register](#).

**EFFECTIVE DATE:** This GIC and the revised GCAM are effective November 12, 2020.

**REGULATION OR TERM AND CONDITION CHANGES:** None.

**HEADQUARTERS CONTACTS:** Chris Murguia, Office of the Chief Financial Officer, Policy Division, Grants Policy & Compliance Branch, 202-358-0648, e-mail: [Christopher.e.murguia@nasa.gov](mailto:Christopher.e.murguia@nasa.gov).

## Appendix A: GCAM Revisions Crosswalk

<b>Section Number &amp; Title</b>	<b>Revision Description</b>
1.0 Acronyms	Acronyms section moved from section 2.4 to 1.0.
2.2 Applicability	New section that describes to which awards the GCAM is applicable and the major regulations on which the GCAM is based.
2.4 Award issuance	Updated to note that now <i>all</i> NASA awards must be issued by the NASA Shared Services Center (NSSC).
2.5 Roles and responsibilities	New section outlining the roles and responsibilities of the Grants Policy and Compliance Branch, program offices, and the NSSC as it relates to award management.
5.1 Program planning and design	New section on program planning and design has been developed to comply with requirements in 2 CFR 200.202, Program planning and design.
5.3 Assistance listing numbers	Section 6.1, Catalogue of Federal Domestic Assistance Numbers, is now Section 5.3, Assistance Listing Numbers.
5.4 System for Award Management and UEI	New section that describe SAM.gov registration and Unique Entity Identifier (UEI) requirements for award recipients per 2 CFR 25. Notice of funding opportunity (NOFO) and terms and conditions template updated accordingly.
5.8.3 NOFO numbering scheme	New section outlining an optional NOFO numbering scheme has been developed.
5.8.4 Proposal evaluation requirements and selection documentation	Section 5.2.5, Evaluation and Selection Documentation, is now Section 5.8.4, Proposal Evaluation Requirements and Selection Documentation. This section has been updated to reflect the new requirement in 200.205 that <i>all</i> discretionary awards must be subject to a merit review process, which program offices must develop and maintain in writing. Also, this section has been updated to reflect the new requirement that program offices "periodically" review their merit review processes.
5.9.1 Single-source proposals	This section has been updated to note that a merit review is required for <i>all</i> proposals.
5.9.2 Unsolicited proposals	This section has been updated to note that a merit review is required for <i>all</i> proposals.

5.9.4 Appealing NASA’s decision to decline a proposal for financial assistance	New section has been created to include the proposal reconsideration process previously only found in the NASA Proposers’ Guide.
5.10 Information contained in a NASA award	Section 5.4, Format and numbering, has been changed to Section 5.10, Information contained in a NASA award. This section has been updated to reflect the new requirement in 2 CFR 200.211 that all awards list performance goals, indicators, targets, and baseline data, where applicable. It has also been updated to reflect the new requirement that awards list a period of performance <i>and</i> a budget period.
5.11 Budget period and period of performance	Section 5.6, Length of award, has been changed to Section 5.11, Budget period and period of performance. This section has been updated to define what a budget period and period of performance is per 2 CFR 200.1, Definitions.
5.13 Pre-award risk assessment	In June 2020, the Grants Policy and Compliance Branch released Grant Information Circular (GIC) 20-04, which outlines the new pre-award risk assessment process for NASA awards. The policy set forth in this GIC has been incorporated into the GCAM at Section 5.13, Pre-award Risk Assessment.
5.14 Budget analysis	Section 5.14.1, Pre-award costs, has been developed to outline NASA's waiver of the requirement for award recipients to obtain written approval prior to incurring project costs up to 90 days before NASA issues an award.
5.15.1 Terms and conditions in award document	This section was formerly 5.10.1. Section updated to reflect the applicability of 2 CFR 25, Universal Identifier and System for Award Management, and 2 CFR 183, Never Contract with the Enemy.
5.15.3 Deviations	Section updated to clarify the types of deviations the Grants Policy and Compliance Branch can make to the GCAM and to 2 CFR 200.
7.1 Performance measurement	New section on performance measurement has been added to comply with requirements in 2 CFR 200.301. This section states that program offices must measure their awards' performance to show achievement of goals and objectives.
7.2 Post-award monitoring	A new section on post-award routine monitoring has been created to clarify NSSC and program office post-award monitoring responsibilities. This section also describes recipients' subaward monitoring responsibilities.

7.4 Payments	Grants Policy and Compliance is removing NPR 9680, which pertains to advanced payments for awards. The policy in 9680 has been incorporated into the GCAM in this new Section, 7.4.
7.5 Performance report requirements	Created a new section clarifying that program offices must use the Research Performance Progress Report (RPPR) data elements unless the program already has an OMB-cleared performance report template. Also updated to reflect new requirements in 2 CFR 200.344 stating that all final closeout documentation, including final financial reports and final performance reports, are now due within 120 days (rather than 90 days) after an award's period of performance expires.
7.8 Methods of procurement	Section updated to reflect new guidance on the micro-purchase threshold and simplified acquisition threshold in 2 CFR 200.317 through 327. Also updated to reflect the new requirement for recipients to provide a preference for goods manufactured in the U.S.
7.9 Change of PI or recipient institution	This section has been updated to clarify that a new award must be issued if a PI changes their organizational affiliation and the current award recipient recommends that a different PI at a different institution take over the project.
7.14 Award termination	Added a new section clarifying when NASA can terminate an award. This section also reflects the new revision in 2 CFR 200.340 stating that agencies can terminate awards if the award no longer effectuates the program goals or agency priorities.
7.15 Appealing a suspended or terminated award	Added a new section outlining award recipients' rights to appeal NASA's decision to suspend or terminate an award.
8.0 NASA insignia guidelines	Created a new section to reflect the guidelines on the use of the NASA insignia that are found on the NSSC grants website and Appendix D36 in the GCAM.
9.0 Closeout procedures	Updated the closeout section to note the new requirement that NASA must make every effort to close out awards within 1 year of the end of the period of performance. Also updated to state that recipients who fail to provide closeout documentation within one year must be reported in FAPIIS.
Appendix A, NOFO template, Section A and B	Sections A and B in Appendix A have been updated to reflect the new requirement that all NOFOs list program goals, objectives, Assistance Listings, and other mandatory information, where applicable.
Appendix D, Terms and Conditions template, D1	Updated Appendix D1 to clarify that awards must comply with 2 CFR 200 as well as 2 CFR 170, 175, 182, and 183, as applicable.

Appendix D, Terms and Conditions template, D2	Updated Appendix D2 to reflect the SAM.gov registration and UEI requirements per 2 CFR 25.
Appendix D, Terms and Conditions template, D3	Updated Appendix D3 to reflect performance reporting requirements outlined in GCAM Section 7.5.
Appendix D, Terms and Conditions template, D4	Updated Appendix D4 to include subaward and executive compensation reporting requirements per 2 CFR 170.
Appendix D, Terms and Conditions template, D6	Updated Appendix D6 to reflect new award termination policies in 2 CFR 200.339 - 200.343.
Appendix D, Terms and Conditions template, D13	Updated Appendix D13 to reflect non-discrimination requirements in Executive Order 13798, Promoting Free Speech and Religious Liberty.
Appendix D, Terms and Conditions template, D21	Grants Policy and Compliance is rescinding regulation 14 CFR 1274. As such, this language has been pulled from the 14 CFR 1274 and placed into the standard terms and conditions template to address a policy gap.
Appendix D, Terms and Conditions template, D22	Grants Policy and Compliance is rescinding regulation 14 CFR 1274. As such, this language has been pulled from the 14 CFR 1274 and placed into the standard terms and conditions template to address a policy gap.
Appendix D, Terms and Conditions template, D24	Updated Appendix D24 to include the requirement that performance goals, objectives, indicators, targets, and baseline data, be listed in an award's terms and conditions, where applicable.
Appendix D, Terms and Conditions template, D25	Updated Appendix D25 to include a new section requiring that awards' period of performance and budget period be clearly stated per 2 CFR 200.309.
Appendix D, Terms and Conditions template, D36	Created a new section, D36, to include the Restrictions on the Use of the NASA Seal, Insignia, Logotype, Program Identifiers, or Flags. This language was previously in Appendix E, Additional Terms and Conditions, but given that it is applicable to all awards, it has been moved to the standard terms and conditions template.
Appendix D, Terms and Conditions template, D37	Created a new section, D37, to include language from the National Defense Authorization Act, section 889, regarding the prohibition on certain telecommunication and video surveillance services or equipment.

Appendix E, Additional Terms and Conditions	Updated the harassment reporting terms and conditions to clarify that this term only applies to research awards rather than all awards.
Entire document	Changed all instances of "commercial firms" to "for-profit organization" to match language in 2 CFR 200.
Entire document	Changed all instances of "Catalogue of Federal Domestic Assistance" and "CFDA" to "Assistance Listing" to match 2 CFR 200.
Entire document	Changed all instances of the words "progress report" to "performance report" to better align with terminology in 2 CFR 200.