



National Aeronautics and  
Space Administration  
Washington, DC 20546

## Grant Information Circular

GIC 22-06

April 21, 2022

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**PURPOSE:** The purpose of this Grant Information Circular (GIC) is to inform Grant Officers, Technical Officers, Program Managers, and award recipients of the change in Acronyms, Appendix D – Award Terms and Conditions, Appendix F – Required Publications and Reports, and Appendix H – NASA Routine Monitoring Plan in the NASA *Grant and Cooperative Agreement Manual* (GCAM).

**BACKGROUND:** NASA is required to conduct systematic and routine oversight activities on the financial assistance awards it issues in accordance with 2 CFR § 200.337, Access to records, and § 200.329, Monitoring and reporting program performance. Per the aforementioned CFR references, NASA, or its authorized representatives, has the right and responsibility to conduct monitoring activities to verify compliance with Federal laws and regulations and review progress made on projects funded with NASA grants or cooperative agreements. NASA regularly monitors all award programs in accordance with Federal laws, regulations (including 2 CFR Part 200), program guidance, and the terms and conditions of the award. All monitoring efforts ultimately serve to evaluate progress towards award goals and proactively target and address issues that may threaten award success during the period of performance (POP).

References in Acronyms as well as Appendices D, F, and H of the GCAM have been revised to ensure the language contained therein elucidates NASA's monitoring and oversight program. The revisions made in the GCAM ensure that routine monitoring responsibilities are well-defined and reflective of the nomenclature and practices employed by NASA staff engaged in routine monitoring.

The clarifications are designed to ensure consistency of effort in NASA's routine monitoring activities while providing guidance to NASA program officials, grant officials, and recipients of their respective responsibilities to ensure proper stewardship of NASA's Federal financial assistance awards.

**GUIDANCE:** The following changes to the GCAM are effectuated with this GIC:

### **GCAM 1.0 Acronyms**

*Added:*

FCTR Federal Cash Transaction Report

FSR Financial Status Report

### **Appendix D - Award Terms and Conditions**

*D8 – Financial Management, corrected to read:*

- (a) Advance payments will be made by the Financial Management Office of the NASA Center assigned financial cognizance of the award, using the Department of Health and Human Services' Payment Management System (DHHS/PMS), in accordance with procedures provided to the recipient. The recipient shall transmit a Federal Cash Transaction Report, and, when applicable, a Standard Form Attachment (SF-425A) electronically within the DHHS/PMS system within 30 days following the end of each Federal fiscal quarter (i.e., December 31, March 31, June 30, and September 30).

- (b) In addition, the recipient shall submit a final Financial Status Report/Federal Financial Report in electronic or paper form to NASA within 120 calendar days after the end date of the period of performance. The final Financial Status Report/Federal Financial Report shall pertain only to the completed award and shall include total disbursements from inception through completion. The report shall be marked “Final.” The final Financial Status Report/Federal Financial Report shall be submitted to NASA per the Grant and Cooperative Agreement Manual (GCAM), Appendix F, Required Publications and Reports. A copy of the GCAM is located at [https://www.nasa.gov/offices/ocfo/gpc/regulations\\_and\\_guidance](https://www.nasa.gov/offices/ocfo/gpc/regulations_and_guidance).

#### **Appendix F - Required Publications and Reports**

*Reports, changed from:*

Quarterly Federal Financial Reports (SF 425)

*To:*

Quarterly Federal Cash Transaction Report (FCTR)

*Final Reports, changed from:*

Properly Certified Final Federal Financial Report, SF 425

*To:*

Properly Certified Financial Status Report/Final Federal Financial Report (FSR/FFR)

#### **Appendix H – NASA Routine Monitoring Plan**

*H3.2.2 – H3.2.4, should read as follows:*

##### **H3.2.2 Reports Review Monitoring**

##### **H3.2.3 Quarterly Federal Cash Transaction Report and Final Federal Financial Reports Review**

GOs must review the quarterly Federal Cash Transaction Report (FCTR) and final Financial Status Report/Federal Financial Report (FSR/FFR) submitted by the recipient in accordance with 2 CFR §200.328, Financial reporting.

The GO performing the review must ensure the following:

- That financial reports are submitted timely:
  - Quarterly FCTR reports are due no later than 30 days past the reporting period end date,
  - Final FSR/FFR reports are due no later than 120 days after the end of the period of performance.
- All amounts in the financial report are cumulative; and
- All funding drawdowns are commensurate with award implementation.
  - Recipients must not draw down more funding than they need for immediate expenditures in accordance with 2 CFR §200.305, Federal payment, and, unless an adequate justification is provided, there should not be prolonged periods of time in which a recipient does not draw down any funds at all.

##### **H3.2.3.1 Review for Excess Cash on Hand**

GOs will review the quarterly FCTR and final FSR/FFR for excess cash on hand, and, if excess cash on hand is identified, review the recipient’s justification for having an excess of cash on

hand. If the justification is insufficient, the GO must reach out to the recipient to properly justify the excess cash or return the cash via the DHHS/PMS system.

#### **H3.2.3.2 Review the Pace of Drawdown**

The NSSC will evaluate the data submitted in the quarterly FCTR to evaluate the pace at which the recipient is drawing down funding. The review involves comparing the amount drawn down for each award against the time elapsed in each award's period of performance (e.g., if the subject quarter is halfway through the period of performance, the cumulative amount of funding drawn down should be roughly equivalent to half of the total award amount.). If the pace of draw is too fast or too slow, the GO must reach out to the recipient to obtain a justification for the pace of drawdown.

#### **H3.2.3.3 Cost Share Review**

If applicable, the recipient must report the amount of cost sharing they have contributed to each award under the "Recipient Share" section of their final FSR/FFR. GOs must review the final FSR/FFR to ensure that the cost share requirement is met. If cost share requirements have not been met, GOs, in consultation with the award's Technical Officer, should inquire with the award recipient to determine why the required cost share has not been met and implement appropriate corrective actions in accordance with sections H3.3 and H3.4 of this appendix.

#### **H3.2.3.4 FCTR and FRS/FFR Approval and/or Follow-up**

GOs must approve the quarterly FCTR and final FSR/FFR or return the report to the recipient with instructions on how to make necessary revisions. The GOs must follow up with the recipient until the report is approved. The approved report must be shared with the award's TO and saved in the official grant file.

#### **H3.2.4 Recurring Reports with GO Validation Requirements**

Reports are valuable to ensure that NASA grant and cooperative agreement projects are efficient and effective. The GO must validate the submission of reports outlined in Table H3.2.4(A) below as well as the quarterly Federal Cash Transaction Report and final Financial Status Report/ Federal Financial Reports outlined in sections H3.2.3 through H3.2.3.4 above throughout the award's period of performance.

Submission validation involves the GO confirming that the recipient has submitted the required report in a timely manner, where applicable, and placing an electronic copy of the report in the award's official grant file.

Recipients will submit the reports outlined below electronically to the cognizant NASA office and provide a copy to the GO. The reports will be considered approved by the cognizant NASA office unless the GO receives notice from the cognizant NASA office within ten (10) business days that the report has not been approved.

**EFFECTIVE DATE:** May 23, 2022

**REGULATION OR TERM AND CONDITION CHANGES:** Yes. The revised language of the term and condition of Appendix D.8 – Financial management, shall be incorporated into all new and modified

grants and cooperative agreements awarded on or the effective date of this GIC. The new term and condition will also be incorporated in the Grant and Cooperative Agreement Manual during the next annual update.

**HEADQUARTERS CONTACTS:** Corey Walz, Office of the Chief Financial Officer, Policy Division, Grants Policy & Compliance, 202.940-6581, e-mail: [corey.a.walz@nasa.gov](mailto:corey.a.walz@nasa.gov).