CLASS DEVIATION to Micro Purchase Threshold  
And Simplified Acquisition Threshold

**PURPOSE:** Effect a class deviation from 2 CFR 1800 Uniform Guidance to increase the micro-purchase threshold (MPT) from $3,500 to $10,000 and the simplified acquisition threshold (SAT) from $150,000 to $250,000.

**BACKGROUND:**

The National Defense Authorization Act for Fiscal Year 2018 (NDAA FY18) (Public Law 115-91), Sections 806 and 805 respectively, increased the MPT to $10,000 and the SAT to $250,000.

Additionally, Section 217(b) of the NDAA FY 2017 (Public Law 114-328) changed a portion of the MPT definition in FAR 2.101 to increase the MPT for acquisitions from institutions of higher education or related or affiliated nonprofit entities, or from nonprofit research organizations or independent research institutes, to $10,000.

The Uniform Guidance in section 200.67 Micro-purchase and section 200.88 Simplified acquisition threshold, respectively, refer to FAR 2.1 for the current levels. FAR Case 2018-004 has been opened to implement the appropriate statutory changes in the FAR. However, NASA desires to use the increased thresholds prior to publication of the FAR changes. NASA approved a Procurement Class Deviation, PCD 18-01, on February 16, 2018 to increase the MPT and SAT.

**GUIDANCE:** Effective immediately, all awardees of grants and cooperative agreements shall comply with the changes set forth in the Enclosure.

**EFFECTIVE DATE:** This deviation from 2 CFR 1800 is effective immediately and shall remain in effect until incorporated into 2 CFR 1800, or until the increased thresholds are incorporated into the FAR, via FAR Case 2018-004.

HEADQUARTERS CONTACT: David Grove, 202-358-0795, David.B.Grove@nasa.gov.

WILLIAM ROETS
William Roets
Director, Contract and Grant Policy Division
NASA
Additions to the baseline are shown as [bolded and bracketed] or yellow highlights. Deletions from the baseline are shown as strikethroughs.

NASA Grant and Cooperative Agreement Manual

In Accordance with 2 CFR Part 200

Implementation Date:
December 26, 2014
Revised: [April 9, 2018]
## Contents

1.0 PURPOSE ................................................................................................................................. 1

2.0 GENERAL ............................................................................................................................... 1

2.1 Relationship between the GCAM and the Federal Acquisition Regulation ....................... 1

2.2 Acronyms .............................................................................................................................. 1

3.0 CHOICE OF AWARD INSTRUMENT .................................................................................... 2

3.1 General .................................................................................................................................... 3

3.2 Basic Considerations in Determining Award Instrument ..................................................... 4

3.3 Questions to Determine Principal Purpose ........................................................................... 4

3.4 Determining Whether to Issue a Grant or Cooperative Agreement .................................... 4

3.5 Nature of Awards .................................................................................................................. 5

3.6 Organizational Conflict of Interest Policy ............................................................................. 5

4.0 LIMITATIONS ....................................................................................................................... 5

5.0 PREAWARD .......................................................................................................................... 7

5.1 Competition .......................................................................................................................... 7

5.2 Competitive Awards ............................................................................................................ 7

5.2.1 Synopses Requirements.................................................................................................. 7

5.2.2 Announcements .......................................................................................................... 8

5.2.3 Proposals ...................................................................................................................... 8

5.2.4 Evaluation and Selection Documentation ...................................................................... 8

5.2.5 Electronic Submission ................................................................................................. 10

5.3 Non-Competitive Awards .................................................................................................. 10

5.3.1 Single-source Proposals ............................................................................................... 10

5.3.2 Unsolicited Proposals .................................................................................................. 11

5.3.3 Grant and Cooperative Agreement Renewals ............................................................. 12

5.4 Format and Numbering ....................................................................................................... 13

5.5 NASA Catalogue Federal Domestic Assistance Structure .................................................. 14

5.6 Length of Award .................................................................................................................. 15

5.7 Funding ............................................................................................................................... 15

5.8 Review of Risk Associated with the Proposer .................................................................... 16

5.9 Budget Analysis .................................................................................................................. 17

5.10 Terms and Conditions in Award Document ...................................................................... 17

5.10.1 Research Terms and Conditions (RTC) ...................................................................... 18

5.11 The Federal Procurement Data System ............................................................................. 18

5.12 Distribution ......................................................................................................................... 19

6.0 POST-AWARD PROCEDURES ........................................................................................... 19

6.1 Administration ..................................................................................................................... 19

6.1.1 Technical Review .......................................................................................................... 19

6.1.2 Public Release of Scientific and Technical Information (STI) by NASA ...................... 19

6.1.3 Methods of procurement .............................................................................................. 20

6.1.4 Simplified acquisition threshold .................................................................................. 20

6.2 Delegation of Administration .............................................................................................. 20

6.3 Change of Principal Investigator or Recipient Institution .................................................. 21

6.4 Administrative Changes and Supplements ......................................................................... 23

6.5 Novations and Change-of-Name Agreements .................................................................. 24

6.6 Approval of Equipment ...................................................................................................... 24

6.7 Exempt Equipment ............................................................................................................. 24
6.8 Accountability and Transparency Act (FFATA of 2006) ................................................................. 25
6.9 Catalogue of Federal Domestic Assistance Numbers ........................................................................... 25
6.10 Center Retention of Authority ........................................................................................................... 26

7.0 Closeout Procedures ............................................................................................................................ 27

8.0 Appendix – Exhibits .............................................................................................................................. 29

  Exhibit A – Standard Announcement Format for NASA Announcements of Grants and Cooperative Agreements ..... 30
  Exhibit B – Waiver Request Process ......................................................................................................... 46
  Exhibit C – Additional Terms and Conditions ......................................................................................... 48
  Exhibit D – Award Terms and Conditions .............................................................................................. 55
  Exhibit E – Required Publications and Reports ....................................................................................... 56
  Exhibit F – Examples of Costs Categories from 2 CFR 200 Subpart E .................................................. 60
6.1.3 Methods of procurement

1. Micro-purchase Threshold. The non-Federal entity must use one of the methods of procurement as prescribed in 2 CFR 200.320[(A)]. As defined in 2 CFR 200.67, the micro-purchase threshold for acquisitions of supplies or services made under grant and cooperative agreement awards issued to institutions of higher education, or related or affiliated nonprofit entities, or to nonprofit research organizations or independent research institutes is —
   a. $10,000; [or
   b. As set by 48 CFR Subpart 2.1 FAR] or
   c. Such higher threshold as determined appropriate by the head of the relevant executive agency and consistent with audit findings under chapter 75 of Title 31, United States Code, internal institutional risk assessment, or State law.

[6.1.4 Simplified Acquisition Threshold

1. Simplified acquisition threshold. The non-Federal entity must use one of the methods of procurement as prescribed in 2 CFR 200.320(B). As defined in 2 CFR 200.88, the simplified acquisition threshold for acquisitions of supplies or services made under grant and cooperative agreement awards is —
   a. $250,000; or
   b. As set by 48 CFR Subpart 2.1 FAR; or
   c. Such higher threshold as determined appropriate by the head of the relevant executive agency and consistent with audit findings under chapter 75 of Title 31, United States Code, internal institutional risk assessment, or State law.]