



National Aeronautics and  
Space Administration  
Washington, DC 20546

## Grant Information Circular

GIC 23-01

October 14, 2022

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**PURPOSE:** The purpose of this Grant Information Circular (GIC) is to inform NASA programs, Grant Officers (GO), and Technical Officers (TO) that the Office of Procurement (OP), Procurement Management and Policy Division, Grants Policy and Compliance team (GPC) has issued a revised version of the *Grant and Cooperative Agreement Manual* (GCAM).

**BACKGROUND:** The GCAM is NASA's definitive policy guide for the implementation of government-wide and NASA-specific regulations for awarding and administering grants and cooperative agreements. The GCAM clarifies award roles, responsibilities, and requirements; provides a centralized location for award resources; and delivers a concise and practical guide for the NASA grants community in the administration of grants and cooperative agreements.

The fiscal year (FY) 2023 GCAM includes policy revisions made in response to Office of Management and Budget (OMB) memoranda, recommended edits from across the NASA grants community, and the incorporation of policies previously released via GICs. Appendix A describes the various revisions that were made to this iteration of the GCAM.

The revised GCAM will apply to all new awards and modified awards issued on or after the effective date of this GIC. This GIC and the revised GCAM will be made publicly available on the Grants Policy and Compliance [website](#).

**EFFECTIVE DATE:** This GIC and the revised GCAM are effective on October 31, 2022, and will remain in effect until the GCAM is revised or amended.

**REGULATION OR TERM AND CONDITION CHANGES:** NASA's standard terms and conditions have been modified. See Appendix A, FY 2023 GCAM Revisions, below for details.

### HEADQUARTERS CONTACTS:

Chris Murguia, Office of Procurement, Procurement Management and Policy Division, Grants Policy & Compliance, 202-358-0648, e-mail: [christopher.e.murguia@nasa.gov](mailto:christopher.e.murguia@nasa.gov).

Corey Walz, Office of Procurement, Procurement Management and Policy Division, Grants Policy & Compliance, 202-940-6581, email: [corey.a.walz@nasa.gov](mailto:corey.a.walz@nasa.gov).

## Appendix A: FY 2023 GCAM Revisions

Section	Topic	Description of Revisions and Edits	Regulatory or Other Requirements Relevant to the Revision
Various	GPC transition to OP	References to certain positions and organizations within the Office of the Chief Financial Officer have been updated to reflect GPC's transition to OP, Procurement Management & Policy Division.	N/A
Various	Transition to SharePoint	GPC moved all of its Max.gov content to SharePoint. Max.gov URLs have been changed to SharePoint. Note that the SharePoint content is only accessible to NASA personnel.	N/A
1.1	Updating definitions	The definitions for "contract", "cooperative agreement", and "grant" have been expanded to include language from 2 CFR 200 for accuracy.	<a href="#">2 CFR 200</a>
2.1	Regulatory references	Added language that describes the five primary regulations (2 CFR 25, 170, 180, 200, and 1800) that pertain to NASA's grants.	<a href="#">2 CFR</a>
3.0-3.1.2	Type of award instrument	These sections have been updated to further clarify the difference between grants, cooperative agreements, and contracts.	<a href="#">Federal Grant and Cooperative Agreement Act of 1977</a>
3.2	Grants to NASA Civil Servants	This section has been updated to clarify that NASA civil servants do not receive grants from NASA to support their research nor do they receive subawards from NASA grant recipients for their research. Rather, NASA civil servants receive funding through the Agency's intra-agency funding transfer process for their research.	N/A

5.3	Unique Entity Identifier (UEI) Requirement	Updated language in 5.3 to state that unless one of the exemptions in 2 CFR 25.110 applies, NASA must not issue a grant or CA to a recipient that does not have a UEI or active SAM registration. Also clarified that Grant Officers (GOs) are the only officials with the authority to make a final determination about the applicability of the exceptions in 2 CFR 25.110, and a justification for allowing the exception has to be documented in the award file.	<a href="#">2 CFR 25</a>
5.4	China restrictions	Updated language related to the China restriction in section 5.4.	<a href="#">PL 117-103, section 526</a>
Section 5.5 and Appendix E5	New IIJA T&C	Section 5.5 and Appendix E5 have been updated to reflect new "Buy America" requirements in the Infrastructure Investments and Jobs Act (IIJA) and OMB memo M-22-11. Essentially, if any future NASA award includes activities that meet the definition of "infrastructure" found in Appendix E5, then that award will be subject to the requirements in Appendix E5. The T&C in E5 is largely taken from the proposed T&C language found in OMB memo M-22-11.	<a href="#">IIJA/ OMB memo M-22-11</a>
5.6	National Environment Policy Act (NEPA) Policy	Added a new section to the GCAM describing the requirement for grantees to comply with NEPA. Prior to this new section being added, there was only a reference to NEPA but no explanation of what NEPA is.	<a href="#">NEPA</a>
5.8.2	Notice of Funding Opportunity (NOFO) reviews	Added language stating that NOFOs posted for less than 60 days, but more than 30 days, are permitted with documented approval from the relevant Program/Project Manager. If a program wishes to post a NOFO for less than 30 days, GPC's prior approval is required. Also, clarified that if a NOFO that has been cleared by GPC is amended, it does not need to be cleared by GPC again.	N/A

5.8.4 - 5.9.2	Peer Review Documentation in Technical Requirements Packages (TRPs)	Updated these sections to clarify that program offices need to include either a "panel summary" or "compiled review document" in the TRPs that are submitted to the NASA Shared Services Center (NSSC) for single-source and unsolicited proposals.	N/A
5.8.4(4)	Requesting new budgets	GPC clarified that programs can decrease a proposed budget by up to 20% without obtaining a new budget from the proposer. Also added language stating that <i>any</i> increase above the proposed amount requires a new budget.	N/A
5.9.4	Proposal non-selection	Language added to clarify what information NASA may provide to declined proposers.	N/A
5.9.5	Appeals process	Language has been added to state that the appeals policy does not pertain to proposals that are nonresponsive or lacking in content.	N/A
5.11	NSSC and OP approvals	Updated to clarify GO responsibilities when reviewing justifications for awards exceeding a five-year period of performance. Language regarding the requirement for programs to obtain GPC approval on awards that exceed a five-year POP <i>and</i> \$5 million award value has been removed from section 5.11 and inserted into section 5.12.	N/A
5.12	NSSC and OP approvals	Language regarding the \$5 million/5-year period of performance approval requirement has been moved to this section from section 5.11. Language has been added to clarify that GOs, not programs, must submit the \$5 yr./\$5M approval requests to OP <i>after</i> they have conducted the approvals in 5.12.6.	N/A
5.13.5	Specific terms and conditions (T&Cs)	Added a new section to the GCAM, section 5.13.5, that addresses specific conditions. The section describes when specific conditions may be added to an award and the information that must be provided to an award recipient when specific conditions are placed on their award.	<a href="#">2 CFR 200.208, Specific conditions</a>

7.2.5	Role of NSSC finance team	Revised language in sec. 7.2.5 to clarify and accurately reflect the NSSC finance team's roles and responsibilities.	N/A
7.7(2)(d)	Principal Investigator (PI) transfers	The GCAM states that PI transfers do not need to be recompleted. Therefore, GPC removed language requiring that TOs document and justify why a PI transfer was not recompleted, as it is contradictory to the GCAM policy. Also added language encouraging TOs to use the NSSC PI transfer webform.	N/A
Appendix A	NOFO template	Appendix A, Standard Format for a NASA Notice of Funding Opportunity (NOFO), has been removed from the GCAM and will be stored on GPC's SharePoint website as a Word document. The intent is to make it easier for program offices to edit the document when developing their NOFOs. Appendix A now contains the certifications, assurances, and representations language.	N/A
Appendix A, section A3	China restriction update	Reference to the latest annual appropriation containing the China restriction has been updated.	<a href="#">PL 117-103, section 526</a>
Appendix D1	Research T&Cs	Currently, there is no language in the terms and conditions (T&Cs) template that references the research T&Cs (RTCs) and their applicability to NASA grants and cooperative agreements. The T&Cs template has been updated to include language regarding the applicability of the RTCs to NASA's awards.	<a href="#">RTCs</a>
Appendix D3	Technical Publications and Reports	The T&Cs template currently does not reference the reporting requirements table in Appendix F. Therefore, Appendix D3 has been updated to reference Appendix F and remove unnecessary information.	N/A
Appendix D8	Financial Reports Updated per GIC 22-06	Relevant revisions from GIC 22-06 have been incorporated into Appendix D8. These revisions consist of updating financial report language for accuracy.	<a href="#">GIC 22-06</a>

Appendix D17	Updated safety and mishap reporting T&C	GPC has consulted with the Office of Safety and Mission Assurance (OSMA) to update Appendix D17, Safety. The T&C is now updated to include a reference to NASA Procedural Requirement (NPR) 8621.1D, and it describes what actions the recipient is required to take. D17 has also been renamed to "Safety and Mishap Reporting."	<a href="#">NPR 8621.1D</a>
Appendix D38	Requirement to obtain quotes from certain vendors	In support of NASA's diversity, equity, inclusion, and accessibility (DEIA) initiative and Executive Order 13985, GPC developed a new T&C requiring any grant or cooperative agreement recipient to obtain at least one quote from a small and/or minority business, women's business enterprise, or labor surplus area firm when making an acquisition that exceeds the simplified acquisition threshold. This T&C was placed into the Federal Register for public comment in April 2022.	<a href="#">EO 13985</a>
Appendix E4	Micro-purchase threshold	Deleting term and condition E4, Micro-purchase Threshold, because it is redundant of a requirement in 2 CFR 200.320, Methods of procurement to be followed, and has no added value in the GCAM.	<a href="#">2 CFR 200.320</a>
Appendix F	Reporting requirements	Revisions have been made to the reporting requirements table in Appendix F for clarity.	N/A
Appendix G3.1.2- G3.1.4	Routine Monitoring Plan updates per GIC 22-06	Relevant revisions from GIC 22-06 have been incorporated into section G3.2.2 through G3.2.4. These revisions consist of updating financial report language and providing instructions to the NSSC for reviewing excess cash on hand and the pace of drawdowns.	<a href="#">GIC 22-06</a>
Appendix G3.4.1- G3.4.4	Transaction Testing	Language has been added to clarify how often the NSSC must conduct transaction testing on each award.	N/A
G4.0	Grant Numbers	Language added to recommend that TOs track their awards by grant number.	N/A