



NAVIGATING THE UNIFORM GUIDANCE (2 CFR 200)

NASA Grants Policy and Compliance

Title 2 of the Code of Federal Regulations, also known as 2 CFR 200, is the primary regulation governing grants and cooperative agreements issued by the US Government. Its purpose is to streamline guidance, reduce administrative burden on award recipients, and guard against waste, fraud, and abuse of Federal funds.

As an award-issuing agency, NASA and its recipients are required to adhere to the regulations in 2 CFR 200. These regulations help ensure that NASA's awards achieve their goals and objectives and that NASA and its recipients are accountable to the American taxpayer.

2 CFR 200 is organized into six subparts.

Subpart A: Acronyms and Definitions

List of acronyms and definitions that are used in 2 CFR 200.

Subpart B: General Provisions

This section describes the purpose of 2 CFR 200, exceptions to the regulations, and universal requirements for Federal agencies and award recipients. Overall, Subpart B is meant to establish uniform regulations governing grants and cooperative agreements for Federal agencies. To ensure that all agencies are adhering to similar regulations, 2 CFR 200 prohibits agencies from imposing additional or inconsistent requirements, unless they are approved by the OMB or required by Federal statute, regulation, or Executive order.

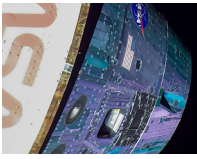
Subpart B also describes the regulation's applicability. It notes that subparts A through F apply to non-federal entities that carry out Federal awards as recipients or subrecipients and allows Federal agencies to determine how subparts A through E are applied to other types of entities.

[2 CFR 1800](#) describes how NASA has chosen to apply subparts A through E to these entities.

Subpart C: Pre-Federal Award Requirements and Contents of Federal Awards

This section describes pre-award guidance to be used by Federal awarding agencies in the program planning, announcement application, and review processes for grants and cooperative agreements. This section provides guidance on the following pre-award requirements:

- Purpose
- Certifications and representations
- Use of grant agreements, cooperative agreements, and contracts
- Pre-award costs
- Program planning and design
- Information contained in a Federal award
- Requirement to provide public notice of Federal financial assistance programs
- Public access to Federal award information
- Notices of Funding Opportunities
- Reporting a determination that a non-federal entity is not qualified for a Federal award
- Federal awarding agency review of risk posed by applicants
- Suspension and debarment
- Standard application requirements
- Never contract with the enemy
- Specific conditions
- Prohibition on certain telecommunications and video surveillance services or equipment



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Subpart D: Post-Federal Award Requirements

This section provides guidance on the following post-award requirements:

- Statutory and national policy requirements
- Modifications of Period of Performance
- Performance management
- Property standards
- Financial management
- Procurement Standards
- Internal controls
- Performance and Financial monitoring and reporting
- Bonds
- Subrecipient monitoring and management
- Federal payments
- Record retention and access
- Cost sharing or matching
- Remedies for noncompliance
- Program income
- Closeout
- Revision of budget and program plans
- Collection of amounts due

Subpart E: Cost Principles

This section helps NASA personnel and recipients determine what costs should and should not be charged to the Federal award. Costs charged to a Federal award must be allowable, reasonable, and allocable.

A few examples:

Allowable cost (200.403):

A cost is allowable if it is necessary and reasonable for the performance of the award and allocable to that award. The cost must also conform to any other applicable requirements in 2 CFR 200 or the award's terms and conditions.

Reasonable cost (200.404):

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Allocable cost (200.405):

A cost is allocable to an award if the goods or services involved are incurred specifically for the award, benefit the Federal award and the work of the recipient, and is necessary to the overall operation of the recipient.

Subpart F: Audit Requirements

This section describes the standards for maintaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal funds.

For example, subpart F, section 200.501, Audit Requirements, requires any State, local government, Indian tribe, Institution of Higher Education, or nonprofit organization that expends more than \$750,000 or more in Federal award funds in their fiscal year to have a single audit performed for that year.

Recipients expending less than \$750,000 are not required to obtain a single audit; however, they must make records available for review or audit by the Federal awarding agency, pass-through entity, or the Government Accountability Office.

A single audit is an organization-wide review designed to determine whether financial statements are presented fairly and if the entity has the internal controls in place to ensure compliance with statutes, Federal regulations, and award terms and conditions.