



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular

GIC 23-06B

December 20, 2023

PURPOSE: The purpose of this Grant Information Circular (GIC) is to inform NASA programs, Grant Officers (GOs), Technical Officers (TOs), and grant and cooperative agreement recipients of revisions to NASA's Required Publications and Reports policy in the NASA *Grant and Cooperative Agreement Manual* (GCAM), and supersession of GIC 23-06 and GIC 23-06A.

BACKGROUND: NASA coordinated with US Department of Health and Human Services (HHS), Payment Management System (PMS) staff to decommission the Federal Cash Transaction Report (FCTR) module in PMS and transition to the Federal Financial Report (FFR) format.

As a result of this transition, agencies were provided the option to keep the quarterly reporting cadence - as once required through the FCTR structure - or modify agency reporting cadence in accordance with 2 CFR 200.328 Financial reporting, *"...must be collected with the frequency required by the terms and conditions of the Federal award, but no less frequently than annually nor more frequently than quarterly except in unusual circumstances."* To avoid changing the reporting requirement approved by our external audit arms and to prevent unanticipated process changes, the initial decision was to keep the quarterly FCTR submission and review cadence. Given the extended timeline for process implementation, NASA evaluated its required reporting posture against the agency's risk tolerance; recipient and agency capacity; reporting practices of other Federal awarding agencies with similar structure, capacity, and internal controls; the financial reporting frequency flexibility provided to Federal awarding agencies by 2 CFR 200; and the reporting and oversight requirements in 2 CFR 200. Weighing these competing factors and guidance, **NASA is modifying its required financial reporting for NASA grant and cooperative agreement recipients from a quarterly to a semi-annual cadence.**

GUIDANCE: NASA's Required Publications and Reports policy is modified as follows reflecting the transition from the FCTR to the FFR for financial reporting and the frequency of the required financial reporting:

- The quarterly FCTR submitted in the period 9/30/2023 to NASA is the last quarterly FCTR submitted to the agency.
- NASA will not require a **quarterly** Federal financial report (either FCTR or FFR) for the period ending December 31, 2023.
- On December 17, 2023, the FCTR module in PMS was deprecated for NASA awards, and NASA grant and cooperative agreement recipients will have "view only" access to historical FCTRs submitted in PMS. If your historical FCTR requires modification, please contact NASA Grant Policy and Compliance at [hq-dl-grants-policy-](https://www.nasa.gov/grants-policy)

compliance@mail.nasa.gov and the PMS helpdesk at pmssupport@psc.hhs.gov for further instructions.

- Beginning with the reporting period ending March 31, 2024, NASA will no longer accept the FCTR for submission of required financial reports. NASA will accept only the semi-annual and final FFR form submitted via PMS.
 - Recipients with final FFR reports due March 31, 2024, or earlier, please continue to submit your final FFR report via email to the award's assigned grant officer and nssc-closeout@mail.nasa.gov.
 - Recipients with final FFR reports due April 1, 2024, or later, please submit your final FFR in PMS.
- The first semi-annual FFR will be due by April 30, 2024, covering the 6-month period from October 1, 2023 – March 31, 2024.
- Recipients will submit their semi-annual FFRs in PMS in 6-month periods thereafter as follows:
 - **Period 2** (April 1 – September 30): Due by October 30 of each year.
 - **Period 1** (October 1 – March 31): Due by April 30 each year.
- Final FFRs are due 90 or 120 days after the end of the POP in accordance with the term and conditions of your NASA award.
- A semi-annual FFR report must be submitted by the recipient for each active NASA grant and/or cooperative agreement award.

NASA's policy reflecting the transition from the FCTR to the FFR and the frequency of the required financial reporting also necessitated further modification of language in the FY23 GCAM in the Acronyms, Post Award Monitoring, and Closeout sections and Appendices D, F, and G. Please see Table 1 below for a summary of the changes to each section.

The clarifications herein are designed to ensure consistency of effort in NASA's financial reporting 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.

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

GCAM 1.0 Acronyms

Removed:

FCTR Federal Cash Transaction Report

FSR Financial Status Report

GCAM 7.1 Post Award Monitoring

Second paragraph corrected to read:

Grant Officers and Technical Officers are responsible for routine post-award monitoring on all awards, regardless of the award's risk determination. At a minimum, routine monitoring includes reviewing award recipients' annual performance reports, semi-annual and final FFR (this is a Grant Officer responsibility), and all other reports that may be required (See Appendix F for a full list of required reports).

9.1 Closeout Process and Requirements

9.1(1)(e) corrected to read:

A final FFR has been received, all payments have been made to the recipient, all reimbursements have been received and reconciled, and any remaining unused balance has been deobligated from the grant or cooperative agreement.

9.1(2)(a) corrected to read:

Review line 10.b of the final or most recently submitted FFR to determine the amount reported as disbursed.

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 (PMS), in accordance with procedures provided to the recipient. In accordance with [2 CFR §200.328](#), the recipient shall submit a Federal Financial Report (FFR) electronically within PMS within 30 days following the end of each NASA reporting period (i.e. April 1 – September 30, and October 1 – March 31).
- (b) In addition, the recipient shall submit a final Federal Financial Report (FFR) electronically within PMS within 120 calendar days after the end date of the period of performance. The final FFR shall pertain only to the completed award and shall include total disbursements from inception through completion. The report shall be marked "Final." The final FFR shall be submitted to NASA per the *Grants and Cooperative Agreement Manual (GCAM)*, Appendix F, Required Publications and Reports.

Appendix F - Required Publications and Reports

Reports, changed from:

Quarterly Federal Cash Transaction Report (FCTR)

To:

Semi-annual Federal Financial Reports (FFR)

Final Reports, changed from:

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

To:

Properly Certified Final Federal Financial Report (FFR)

Submits Report to: GO and nssc-closeout@mail.nasa.gov.

Appendix G – NASA Routine Monitoring Plan

G3.1.3 – G3.2.4, should read as follows:

G3.1.3 Semi-annual and Final Federal Financial Reports Review

GOs must review the semi-annual and final Federal Financial Report (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:
 - Semi-annual FFR reports are due no later than 30 days past the reporting period end date,
 - Final FFRs 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.

G3.1.3.1 Review for Excess Cash on Hand

GOs will review the semi-annual and final 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 PMS.

G3.1.3.2 Review the Pace of Drawdown

The NSSC will evaluate the data submitted in the semi-annual FFR 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 period 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.

G3.1.3.3 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 semi-annual and final FFR. GOs must review the FFRs 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 G3.3 and G3.4 of this appendix.

G3.1.3.4 FFR Approval and/or Follow-up

GOs must approve the semi-annual and final FFR in PMS 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 upon request.

G3.1.4 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 G3.1.4(A) below as well as the semi-annual and final FFR outlined in sections G3.1.3 through G3.1.3.4 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.

Table 1 – Summary of Changes

Section	Subsection	Summary of Changes
1.0 Acronyms	N/A	Deleted acronyms.
7.1 Post Award Monitoring	N/A	<ul style="list-style-type: none"> • Updated “FCTR” to “FFR” • Updated reporting frequency from “quarterly” to “semi-annual.”
9.1 Closeout Process and Requirements	<i>9.1(1)(e)</i>	<ul style="list-style-type: none"> • Deleted final Financial Status Report/Federal Financial Report (SF-425) • Added “FFR”.
9.1 Closeout Process and Requirements	<i>9.1(2)(a)</i>	<ul style="list-style-type: none"> • Deleted: “the most recently submitted cash status information on item 5 of the Federal Financial Report (FFR) Attachment or, as applicable,”
Appendix D - Award Terms and Conditions	<i>D8 - Financial Management (a)</i>	<ul style="list-style-type: none"> • Deleted (DHHS/PMS) • Deleted “Federal Cash Transaction Report, and, when applicable, a Standard Form Attachment (SF-425A)” • Deleted “Federal fiscal quarter (i.e., December 31, March 31, June 30, and September 30). • Added “PMS” • Added “Federal Financial Report (FFR)”

		<ul style="list-style-type: none"> Added “NASA reporting period (i.e. April 1 – September 30, and October 1 – March 31).”
Appendix D - Award Terms and Conditions	<i>D8 – Financial Management (b)</i>	Updated all references from “Financial Status Report/Federal Financial Report (FSR/FFR)” to “Federal Financial Report (FFR)”.
Appendix F - Required Publications and Reports	Reports	Updated references from “FCTR” to “FFR”.
Appendix F - Required Publications and Reports	Final Reports	<ul style="list-style-type: none"> Updated references from “FCTR” to “FFR”. Added submission email nssc-closeout@mail.nasa.gov.
Appendix G – NASA Routine Monitoring Plan	G3.1.3 Semi-annual and Final Federal Financial Reports Review	<ul style="list-style-type: none"> Updated references from “FCTR” to “FFR”. Updated references from “Financial Status Report/Federal Financial Report (FSR/FFR)” to “Federal Financial Report (FFR)”.
Appendix G – NASA Routine Monitoring Plan	G3.1.3.1 Review for Excess Cash on Hand	<ul style="list-style-type: none"> Updated references from “FCTR” to “FFR”. Updated references from “Financial Status Report/Federal Financial Report (FSR/FFR)” to “Federal Financial Report (FFR)”.
Appendix G – NASA Routine Monitoring Plan	G3.1.3.2 Review the Pace of Drawdown	Updated references from “FCTR” to “FFR”.
Appendix G – NASA Routine Monitoring Plan	G3.1.3.4 FFR Approval and/or Follow-up	<ul style="list-style-type: none"> Updated references from “FCTR” to “FFR”. Updated references from “Financial Status Report/Federal Financial Report (FSR/FFR)” to “Federal Financial Report (FFR)”.
Appendix G – NASA Routine Monitoring Plan	G3.1.4 Recurring Reports with GO Validation Requirements	<ul style="list-style-type: none"> Updated references from “FCTR” to “FFR”. Updated references from “Financial Status Report/Federal Financial Report (FSR/FFR)” to “Federal Financial Report (FFR)”.

ACTIONS GRANT AND COOPERATIVE AGREEMENT RECIPIENTS SHOULD TAKE: NASA grant and cooperative agreement recipients who currently have access to PMS should log in to PMS and update their permissions to request access to the FFR module. Information on updating user permissions can be found [here](#).

PMS TRAINING FOR GRANT AND COOPERATIVE AGREEMENT RECIPIENTS: PMS staff will provide training to NASA grant and cooperative agreement recipients on the functionalities of the PMS system, the roles and responsibilities associated to each permission level, and burden-reducing tips for FFR reporting. Dates of PMS training will be shared as soon as they are scheduled.

NASA will record these trainings and make them available to our grant and cooperative agreement recipient community on the [NASA Grants and Cooperative Agreements YouTube Channel Playlist](#) for future reference.

EFFECTIVE DATE: December 20, 2023

REGULATION OR TERM AND CONDITION CHANGES: Yes. The revised language of the term and condition of Appendix D8 – Financial Management, shall be incorporated into all new and amended grants and cooperative agreements awarded on or after the effective date of this GIC. The new term and condition will be incorporated in the *Grant and Cooperative Agreement Manual* during the next update.

SUPERSESSION: This GIC supersedes GIC 23-06 and GIC 23-06A.

HEADQUARTERS CONTACTS: Corey A. Walz, Office of Procurement, Procurement and Grants Policy Division, Grants Policy and Compliance, e-mail: corey.a.walz@nasa.gov.