



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular

GIC 24-01

March 4, 2024

PURPOSE: The purpose of this Grant Information Circular (GIC) is to inform NASA Grant Officers (GOs) of revisions to NASA's Delegation of Property Administration policy in the NASA [Grant and Cooperative Agreement Manual](#) (GCAM).

BACKGROUND: In an effort to streamline the management and stewardship of NASA's property, the Office of Strategic Infrastructure (OSI) developed and maintains NASA Procedural Directive (NPD) [4500.1A](#), titled "Administration of Property in the Custody of Award Recipients." This directive forms the cornerstone of policies and responsibilities governing the administration of government property in NASA grant and cooperative agreement recipients' custody.

This GIC amends the GCAM to align with NPD 4500.1A and directs GOs to NPD 4500.1A and any subsequent guidelines produced by OSI related to NASA grants and cooperative agreements involving government property. Reflected principally in section 6.0(2) of the GCAM, this update supersedes past GCAM provisions not aligned with OSI guidance, and revises sections 7.8, 9.1, and Appendix D5 of the GCAM to eliminate conflicting administrative guidance and ensure consistent administration in NASA awards with delegated property administration. Details of the changes to each section are in the Guidance section below.

GUIDANCE: Delegation of property outlined in the GCAM shall be modified as follows:

- **GCAM section 6.0, Delegation of Property Administration, will read as follows:**

1. GOs will delegate the property administration function: (1) when a grant or cooperative agreement is awarded with Government-furnished property (GFP), (2) when the Government retains title to recipient-acquired property, or (3) as set forth in paragraph 2 below.

- a. Per 2 CFR § [200.312](#), Federally-owned and exempt property, NASA is authorized to vest title to property acquired under a Federal award without further responsibility to the Federal Government when statutory authority exists. Per 2 CFR § [1800.312](#), NASA exercises its authority under the Chiles Act, [31 U.S.C. §§ 6301 to 6308](#), to vest title to tangible personal property acquired with Federal funds to nonprofit institutions of higher education and nonprofit organizations whose primary purpose is conducting scientific research without further obligation to NASA, including reporting requirements. As such, property delegation is not required for awards to which 2 CFR § 200.312 and 2 CFR § 1800.312, Federally-owned and exempt property, are applicable.

b. Award recipients that are not nonprofit institutions of higher education or nonprofit organizations whose primary purpose is not conducting scientific research shall adhere to regulations at 2 CFR §§ 200.312-200.316, including the requirement to submit an annual inventory report to NASA.

2. When a grant or cooperative agreement is awarded with Government-furnished or recipient-acquired Government property and property delegation is required per paragraph 1 of this section, the GO must refer and adhere to any relevant guidance in NPD [4500.1A](#), Administration of Property in the Custody of Award Recipients, and any other guidance issued by NASA OSI related to government property (GP) administration.

The following GCAM changes are made to remove language potentially conflicting with NPD 4500.1A and are administrative in nature.

- **GCAM section 7.8(3), Administrative Changes and Supplements, will read as follows:**

3. If an award has been extended, Grant Officers must forward a copy of the extension to the cognizant Federal Industry Partner (FIP) if Federal property administration responsibilities have been delegated to a FIP.

- **GCAM section 9.1(1)(c), Closeout Process and Requirements, will read as follows:**

c. For those grants and cooperative agreements containing Government property and for which property administration has been delegated to a Federal Industry Partner (FIP), property disposition has been completed and the Grant Officer has received written notification from the FIP indicating that all property administration duties have been completed. Electronic notification via email is acceptable for this notification.

- **Appendix D5 (b) & (c), Extensions, will read as follows:**

(b) Recipients may extend the expiration date of an award if additional time beyond the established end date is required to assure adequate completion of the original scope of work within the funds already made available. For this purpose, the recipient may make a one-time no-cost extension, not to exceed 12 months, prior to the established expiration date. Written notification of such an extension, with a supporting justification, must be submitted to the NASA Grant Officer via the NSSC's [no-cost extension webform](#) at least ten days prior to the expiration of the award. NASA reserves the right to disapprove the extension if the requirements set forth at 200.308 (e)(2), Revision of budget and program plans, are not met.

(c) Requests for approval for subsequent no-cost extensions must be submitted in writing to the NASA Grant Officer via the NSSC's [no-cost extension webform](#).

Summary of Changes:

Section	Paragraph	Summary of Changes
6.0	1	Removed reference to paragraph 3 (now rescinded) and changes the GOs action from “retention” to “delegation” of property administration.
6.0	2	Added language referring the GO to NPD 45.001A and any other guidance issued by NASA OSI. Removed reference to Office of Naval Research (ONR).
6.0	3-5	Rescinded.
7.8	3	New. Included to provide guidance to GOs on coordination requirements for extension requests on awards containing delegated government funded property.
9.1	1(c)	Removed references to ONR and added FIP
Appendix D	(b) & (c)	Removed guidance to GOs on coordination with ONR for extensions. Moved to GCAM section 7.8.

EFFECTIVE DATE: April 4, 2024

REGULATION OR TERM AND CONDITION CHANGES: Yes. GCAM Appendix D5, Extensions, is modified as noted in this GIC.

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