



NASA GRANT AND COOPERATIVE AGREEMENT MANUAL (GCAM)

NASA's grant manual for proposers and recipients

NASA Office of Procurement
Procurement and Grants Policy Division
Grants Policy and Compliance

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Foreword

The National Aeronautics and Space Administration (NASA) is an independent Federal agency of the United States (U.S.) created by the [National Aeronautics and Space Act of 1958](#) (Public Law (Pub. L.) 85-568). NASA has five Mission Directorates, each assigned responsibility for implementing NASA's vision, mission, and values as outlined in the latest [NASA Strategic Plan](#). The Mission Directorates pursue NASA's goals using a wide variety of ground-, aeronautical-, and space-based programs, and any of these organizations may issue notices of funding opportunities (NOFOs) that will incorporate this document by reference.

The Mission Directorates are listed below:

- Aeronautics Research Mission Directorate ([ARMD](#))
- Exploration Systems Development Mission Directorate ([ESDMD](#))
- Science Mission Directorate ([SMD](#))
- Space Operations Mission Directorate ([SOMD](#))
- Space Technology Mission Directorate ([STMD](#))

Furthermore, NASA's Office of Science, Technology, Engineering, and Math (STEM) Engagement (OSTEM), in collaboration with the Mission Directorates and other NASA offices, issues NOFOs that solicit evidence-based projects that foster formal or informal STEM education. Visit NASA [OSTEM](#) for the most up-to-date information on performance and priorities.

1.0 Acronyms & Abbreviations

AO	Announcement of Opportunity
AOR	Authorized Organizational Representative
CAN	Cooperative Agreement Notice
CFR	Code of Federal Regulations
COI	Conflict of Interest
Co-I	Co-Investigator
CoPI	Co-Principal Investigator
FAC	Federal Audit Clearinghouse
FAPIIS	Federal Awardee Performance and Integrity Information System
FAR	Federal Acquisition Regulation
FGCAA	Federal Grant and Cooperative Agreement Act
FFATA	Federal Funding Accountability and Transparency Act
FFR	Federal Financial Report
FSRS	FFATA Subaward Reporting System
GCAM	NASA Grant and Cooperative Agreement Manual
GIC	Grant Information Circular
GO	Grant Officer
GPC	Grants Policy and Compliance
HHS	Department of Health and Human Services
IJA	Infrastructure Investment and Jobs Act
IPA	Intergovernmental Personnel Act
ITAR	International Traffic in Arms Regulations
JPL	Jet Propulsion Laboratory
MFTRP	Malign Foreign Talent Recruitment Program
MTDC	Modified Total Direct Costs
NASA	National Aeronautics and Space Administration
NEPA	National Environmental Policy Act
NOFO	Notice of Funding Opportunity
NSPIRES	NASA Solicitation and Proposal Integrated Review and Evaluation System
NRA	NASA Research Announcement
NSSC	NASA Shared Services Center
OMB	Office of Management and Budget
OGC	Office of the General Counsel
OP	Office of Procurement
PGPD	Procurement and Grants Policy Division
PI	Principal Investigator
POP	Period of Performance
RPPR	Research Performance Progress Report
SAM.gov	System for Award Management
STI	Scientific and Technical Information
TO	Technical Officer
UEI	Unique Entity Identifier

1.1 Definitions

This section defines select key terms that are relevant to award management at NASA. This list of definitions is not exhaustive, and additional definitions can be found in Title 2 of the U.S. Code of Federal Regulations (CFR) Part 200 ([2 CFR 200](#)), [§ 200.1](#), Definitions. For the purposes of this Manual, the following definitions apply:

Amendment: Any document used to effect modifications to grants and cooperative agreements. Amendments include, but are not limited to, extensions, supplements, augmentations, and administrative corrections.

Applicant: An applicant is any entity that submits to NASA a proposal for a grant or cooperative agreement. See section 9.3, Application Requirements and Checking Eligibility, for more information on the types of entities that may apply for NASA awards.

Application: A formal request submitted to NASA in response to a federal financial assistance opportunity. For purposes of this document, the term application is synonymous with proposal and these terms are used interchangeably.

Authorized Organizational Representative (AOR): An AOR is a member of an entity applying for a NASA grant or cooperative agreement who is authorized to commit that entity to the requirements of a NASA-funded award. Entities typically delegate authority to AORs for activities including, but not limited to, submitting applications or award amendment requests, signing certifications and assurances, or withdrawing applications from consideration. AORs are responsible for certifying to the accuracy of a proposal and agreeing to accept the obligation to comply with NASA award terms and conditions. As such, AORs must be a member of the applicant entity.

Award: In this Manual, an “award” or “Federal award” is defined as the Federal financial assistance, meaning grant or cooperative agreement, that a recipient receives directly from NASA or indirectly from a pass-through entity. “Award” does not mean “contract” in this Manual.

Contract: In this Manual and for purposes of Federal financial assistance, a “contract” is defined as a legal instrument by which a grant or cooperative agreement recipient or subrecipient conducts a procurement transactions *under a Federal award*. Characteristics indicative of a procurement relationship between a grant or cooperative agreement recipient and a contractor are present when the contractor:

1. Provides the goods and services within its normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Normally operates in a competitive environment;

4. Provides goods or services that are ancillary to the operation of the Federal program; and
5. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Cooperative agreement: A legal instrument of financial assistance between a Federal agency and a recipient or between a pass-through entity and a subrecipient that, consistent with [31 United States Code \(U.S.C.\) §§ 6302-6305](#):

1. Is used to enter into a relationship when the principal purpose is to transfer anything of value to carry out a public purpose authorized by a law of the United States (see [31 U.S.C. § 6101\(3\)](#)); and not to acquire property or services for the Federal Government or pass-through entity's direct benefit or use;
2. Is distinguished from a grant in that it provides for substantial involvement of the Federal agency or pass-through entity in carrying out the activity contemplated by the Federal award.
3. The term does not include:
 - a. A cooperative research and development agreement as defined in [15 U.S.C. § 3710a](#); or
 - b. An agreement that provides only:
 - i. Direct United States Government cash assistance to an individual,
 - ii. A subsidy,
 - iii. A loan,
 - iv. A loan guarantee, or
 - v. Insurance.

Cost sharing: The portion of project or program costs not paid by Federal funds or contributions (unless authorized by Federal statute). This term includes matching, which refers to required levels of cost share that must be provided.

Federal award date: Federal award date means the date when a NASA Grant Officer signed (physically or digitally) the Federal award.

Grant: A legal instrument of financial assistance between a Federal agency and a recipient or between a pass-through entity and a subrecipient, consistent with [31 U.S.C. §§ 6302, 6304](#):

1. Is used to enter into a relationship the principal purpose of which is to transfer anything of value to carry out a public purpose authorized by a law of the United States (see [31 U.S.C. § 6101\(3\)](#)); and not to acquire property or services for the Federal agency or pass-through entity's direct benefit or use;
2. Is distinguished from a cooperative agreement in that it does not provide for substantial involvement of the Federal agency in carrying out the activity contemplated by the Federal award.
3. Does not include an agreement that provides only:
 - a. Direct United States Government cash assistance to an individual,
 - b. A subsidy,
 - c. A loan,
 - d. A loan guarantee, or
 - e. Insurance.

Grant Officer (GO): A NASA civil servant who is assigned the responsibility of negotiating and/or administering grants and cooperative agreements. GOs are the only NASA personnel that may issue, amend, or terminate a NASA award.

Malign Foreign Talent Recruitment Program (MFTRP): MFTRP has the definition found in [42 U.S.C. § 19237\(4\)](#).

Modified total direct cost (MTDC): If a recipient is applying an indirect cost rate to its NASA award, the indirect cost rate must be applied on the basis of the award's MTDC, which means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward (regardless of the period of performance of the subawards under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$50,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

Notice of Funding Opportunity (NOFO): A formal announcement of the availability of Federal funding through a financial assistance program. The NOFO provides information on the award, such as who is eligible to apply, the evaluation criteria for selecting a recipient, the required components of an application, and how to submit the application. A NOFO is any paper or electronic issuance that NASA uses to announce a funding opportunity for federal financial assistance, whether it is called a "NASA Research Announcement (NRA)," "Broad Agency Announcement," "Cooperative Agreement Notice (CAN)," "solicitation," or some other term.

Participant: Participant generally means an individual participating in or attending program activities under a NASA award, such as trainings or conferences, but who is not responsible for implementation of the award. Individuals committing effort to the development or delivery of program activities under a NASA award (such as consultants, project personnel, or staff members of a recipient or subrecipient) are not participants. Examples of participants may include community members participating in a community outreach program, members of the public whose perspectives or input are sought as part of a program, students, or conference attendees.

Participant support costs: Direct costs that support participants and their involvement in a NASA award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants.

Pass-through entity: A recipient or subrecipient that provides a subaward to a subrecipient (including lower-tier subrecipients) to carry out part of a Federal program. Given that NASA does not issue grants or cooperative agreements to NASA Centers or other Federal agencies, NASA Centers and Federal agencies cannot serve as pass-through entities on a NASA-funded award.

Performance report: A summary of accomplishments and challenges during a reporting period. All NASA award recipients must utilize the Research Performance Progress Report (RPPR) [data elements](#) when submitting performance reports unless NASA has authorized the recipient to use a different format or template. See section 29.1, Performance Report Requirements, of this Manual for more details on performance report requirements. See section 5.0, Deviations, for information on requesting a deviation to the RPPR requirement.

Solicited Proposal: A written proposal submitted by an applicant for the purpose of obtaining a financial assistance award in response to a NASA NOFO or single-source proposal request.

Substantial involvement: Federal agency substantial involvement is the primary factor distinguishing a cooperative agreement from a grant. The nature of NASA's substantial involvement on a cooperative agreement will vary and be project-dependent, and it may include collaboration, participation, or intervention in the activity being performed under the award. Substantial involvement does not include award administration, monitoring, or oversight activities.

Technical Officer (TO): A NASA civil servant or Intergovernmental Personnel Act (IPA) Mobility Program participant responsible for managing the scientific, technical, and programmatic aspects of NASA awards. TO responsibilities include tasks such as evaluating award proposals, recommending proposals for funding, and engaging in programmatic post-award monitoring activities.

Introduction

2.0 Purpose

The *NASA Grant and Cooperative Agreement Manual* (GCAM) provides policy guidance to Federal financial assistance applicants and recipients on the implementation of Federal government-wide and NASA-specific regulations pertaining to the grants life cycle, which consists of activities categorized into four phases: pre-award, award, post-award, and closeout. The GCAM is written, maintained, and distributed by Grants Policy and Compliance (GPC) in NASA's Office of Procurement (OP), Procurement and Grants Policy Division (PGPD). The GCAM only applies to NASA grants and cooperative agreements, and it does not apply to any other type of funding instrument, such as procurement contracts or Space Act Agreements.

The GCAM consists of the following chapters:

- [Chapter 1](#), Pre-award, addresses the pre-award phase of the grant life cycle and provides general information for those interested in applying for grants and cooperative agreements.
- [Chapter 2](#), Award, addresses the award phase of the life cycle and includes information on award processes and procedures.
- [Chapter 3](#), Post-award, provides information on the post-award phase of the life cycle and outlines requirements of grant and cooperative agreement recipients once an award has been issued.
- [Chapter 4](#), Closeout, provides guidance on the closeout of NASA grants and cooperative agreements.
- [Chapter 5](#), Single Audit, provides an overview of single audit requirements for award recipients and how NASA utilizes single audits to monitor recipient compliance.

Specific writing conventions are utilized throughout this document. The word “award” means “grant” or “cooperative agreement.” Additionally, unless otherwise specified, the word “grant” also means cooperative agreement. The word “shall” indicates a requirement or mandate, and the word “should” indicates a recommendation.

2.1 Applicability of the GCAM and Federal Regulations Governing Financial Assistance Awards

This version of the GCAM applies to all new grants and cooperative agreements, modified and amended grants and cooperative agreements, and new NOFOs issued by NASA on or after this Manual's effective date. Policies established in the GCAM are primarily based on Title 2 of the

Code of Federal Regulations ([2 CFR](#)), Federal Financial Assistance. In instances where the GCAM is silent on guidance provided in 2 CFR, the requirements in 2 CFR govern. Within 2 CFR, there are five parts that are most pertinent to NASA grants and cooperative agreements:

- [2 CFR part 25](#) – Universal Identifier and System for Award Management. The requirements in this part establish the Unique Entity Identifier (UEI) as a universal identifier for Federal financial assistance applicants, as well as recipients and their direct subrecipients, and the System for Award Management ([SAM.gov](#)) as the repository for standard information about applicants and recipients.
- [2 CFR part 170](#) – Reporting Subaward and Executive Compensation Information. This part provides guidance to Federal awarding agencies on reporting Federal awards, establishing requirements for recipients' reporting of information on subawards and executive total compensation, as required by the Federal Funding Accountability and Transparency Act (FFATA) of 2006 ([Pub. L. 109-282](#)), as amended by section 6202 of [Pub. L. 110-252](#), or “the Transparency Act”.
- [2 CFR part 180](#) – OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Nonprocurement). This part provides Office of Management and Budget (OMB) guidance for Federal agencies on the government-wide debarment and suspension system for nonprocurement programs and activities.
- [2 CFR part 184](#) - This part provides guidance to Federal awarding agencies on the implementation of the Buy America Preference applicable to Federal financial assistance set forth in part I of subtitle A, Buy America Sourcing Preferences, of the Build America, Buy America Act included in the Infrastructure Investment and Jobs Act (IIJA) ([Pub. L. 117-58](#)).
- [2 CFR part 200](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. The requirements established in this part apply to all Federal agencies that make Federal awards to non-Federal entities. For NASA awards subject to 2 CFR 200, Subparts A through F shall apply to all award recipients except for for-profit organizations. 2 CFR 200, subparts A through D, apply to for-profit organizations, and the cost principles in the Federal Acquisition Regulation (FAR) at [48 CFR parts 30](#) and [31](#) take precedence over the cost principles in subpart E of 2 CFR 200 for awards issued to for-profit organizations.
- [2 CFR part 1800](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. 2 CFR 1800 is NASA’s supplement to the requirements set forth in 2 CFR 200. The requirements in this part are applicable to awards that NASA issues to non-Federal entities, for-profit organizations, and foreign organizations as allowed by 2 CFR § [200.101](#), Applicability.

All requirements in 2 CFR and the [NASA Grant and Cooperative Agreement Terms and Conditions](#) (GCAT) flow down to subaward recipients, unless stated otherwise. All recipients

shall ensure that subaward recipients comply with all applicable sections of the aforementioned regulations.

2.2 Order of Precedence for Federal Financial Assistance Regulations and Policy

The following is the order of precedence of laws and policies for NASA grants and cooperative agreements. Items at the top of the list take precedence over items at the bottom. In the event of a discrepancy or any inconsistency between an award's [terms and conditions](#) and other requirements, the following order of precedence should be followed:

1. Provisions of the United States (U.S.) Code, as applicable.
2. 2 CFR, Subtitle A, *Office of Management and Budget Guidance for Federal Financial Assistance*, and 2 CFR 1800, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.
3. General, special, and program-specific terms and conditions
4. *NASA Grant and Cooperative Agreement Manual*, Chapters 2-5
5. NASA notices of funding opportunity (NOFOs)
 - a. Note that some contents in a NOFO may differ from what is set forth in GCAM, Chapter 1. If the content of a NOFO differs from the content in GCAM, Chapter 1, then the NOFO takes precedence. If the NOFO is silent on a particular topic, recipients should follow the guidance set forth in the GCAM on that topic.
6. GCAM, Chapter 1

2.3 Relationship between the GCAM and Grant Information Circulars

PGPD/GPC may issue interim policies or guidance by way of a Grant Information Circular (GIC). GICs supplement, clarify, augment, remove, and/or alter information included in the GCAM or provide other important updates. PGPD/GPC will make GICs publicly available on the PGPD/GPC [GICs webpage](#). Expired GICs are housed on the [PGPD/GPC Archive webpage](#).

During the GCAM update process, PGPD/GPC incorporates permanent, relevant, and active GICs into the text of the GCAM and then retires the active GICs to the GIC archive for future reference. GICs that contain expired or temporary policies or that provide informational updates are not incorporated into the GCAM. NASA award recipients and any other entity with an interest in current policies related to NASA grants and cooperative agreements should reference both the GCAM and active GICs.

2.4 Relationship between the GCAM and the Federal Acquisition Regulation (FAR)

If an award is issued to a for-profit organization, the [FAR](#) cost principles at [part 30](#), Cost Accounting Standards Administration, and [part 31](#), Contract Cost Principles and Procedures, apply. NASA Research Announcements (NRA) may result in a contract, and in cases in which contracts may be issued based on an NRA, that NRA is subject to the standard format for a NASA NOFO and FAR solicitation requirements.

2.5 Key NASA Stakeholders in Award Management

Award management at NASA is a collaborative effort that involves OP, specifically PGPD/GPC and the NASA Shared Services Center ([NSSC](#)), and funding organizations that reside within NASA's Mission Directorates and offices. In summary, each organization is responsible for the following activities:

- [PGPD/GPC](#) is responsible for developing Agency-wide award policies and guidance, ensuring that NASA complies with applicable statutes and regulations, and providing technical assistance and training to NASA's award applicants and recipients. PGPD/GPC is located within OP at NASA Headquarters in Washington, DC.
- NASA's Grant Officers (GOs) work in the NSSC [Grants Activities Branch](#) at NASA's Stennis Space Center. GOs are responsible for issuing awards, monitoring awards after they have been issued to ensure compliance with applicable statutes and regulations, issuing award amendments, approving post-award actions, and providing administrative assistance. The NSSC's grant closeout team is responsible for closing out awards after a project has concluded. NASA policy requires that all grant and cooperative agreement actions be processed, awarded, managed, and administered by the NSSC.
- Various funding organizations throughout NASA fund and manage Federal awards. Each NASA award is assigned a Technical Officer (TO), a NASA official who manages the programmatic, scientific, and technical aspects of the award. Funding organizations are responsible for identifying resources; soliciting, evaluating, and selecting or declining proposals; and monitoring awards to ensure performance goals are achieved. Funding organizations are generally the five Mission Directorates and the Office of STEM Engagement (OSTEM). An overview of the NASA grants landscape is located on the NASA Grants Programs and Resources [fact sheet](#). The following fact sheets illustrate the breadth of grant-funding offices at NASA:
 - [Aeronautics Research Mission Directorate](#)
 - [Exploration Systems Development Mission Directorate](#)

- [Science Mission Directorate](#)
- [Space Operations Mission Directorate](#)
- [Space Technology Mission Directorate](#)
- [Office of STEM Engagement](#)

3.0 Types of Award Instruments

Congress enacted [The Federal Grant and Cooperative Agreement Act of 1977 \(FGCAA\)](#), 31 U.S.C. § [6301](#) et. seq., (FGCAA) due to concerns about Federal agencies' perceived misuse of grants and cooperative agreements, specifically agencies' use of grants and cooperative agreements to circumvent the competition rules that apply to procurement contracts conducted by Federal agencies. The FGCAA was enacted to provide a clearer sense of the intent of Congress when Federal agencies issue their financial assistance awards. The FGCAA provides definitions of the types of instruments executive agencies may award by characterizing the relationship between executive agencies and contractors, States, local governments, and other recipients in acquiring property and services and in providing Federal financial assistance. The FGCAA characterizes instruments by defining the terms "contract," "grant," and "cooperative agreement," and these definitions are set forth in section 1.1, Definitions, of this Manual. (Additionally, "contract," "grant," "cooperative agreement," and "Federal financial assistance" are further defined at [2 CFR § 200.1, Definitions](#).)

NASA uses a grant when the principal purpose of the funded activity is to transfer anything of value to carry out a public purpose authorized by a law of the United States and substantial involvement from NASA *is not* required. NASA uses a cooperative agreement when the principal purpose of the funded activity is to transfer anything of value to carry out a public purpose authorized by a law of the United States and substantial involvement from NASA *is* required. NASA's substantial involvement on a project does not automatically mean that a cooperative agreement is the appropriate funding instrument. Cooperative agreements must always support a public purpose, and NASA's substantial involvement on a project that does not support a public purpose must be funded via another method, such as a contract.

NASA must never be the direct beneficiary of a grant or cooperative agreement. If the principal purpose of the funded activity is to provide a product or service for NASA's direct benefit or use, then a contract is the appropriate legal instrument. This requirement to use a contract also applies when NASA requires research or research-related services for its direct benefit or use.

Although NASA's authority is not limited to research awards, the vast majority of NASA awards are issued to support research and research-related activities. Research-related activities may include, but are not limited to, education, travel, conferences, and training. Information on active and closed NASA grants and cooperative agreements is available to the public at [USAspending.gov](#).

4.0 Limitations

1. NASA does not award grants or cooperative agreements to provide monetary donations to individuals, groups, or institutions regardless of the purpose(s).
2. NASA's ability to award grants and cooperative agreements is limited by appropriations available to carry out authorized Agency programs. Advice of NASA legal counsel will be sought in unusual situations.
3. Excess Government research property may be donated to educational institutions and non-profit organizations pursuant to [15 U.S.C. § 3710\(I\)](#), and such donation is not considered a grant. See 2 CFR § [200.312\(b\)](#), Federally-owned and exempt property.
4. Loans of other Government property not associated with a contract, grant, or cooperative agreement under [31 U.S.C. § 6301](#) to 6308, and made under the National Aeronautics and Space Act of 1958 ([51 U.S.C. § 20101](#) et. seq.), are accomplished through separate NASA loan agreements that are not considered contracts, grants, or cooperative agreements.
5. Neither grants nor cooperative agreements shall be used as legal instruments for consulting services to NASA.
6. Grants and cooperative agreements shall not be used as legal instruments for facility design or construction services for NASA.
7. NASA grants and cooperative agreements are not used to fund, in whole or in part, real property or general remodeling, construction, or demolition of a new or existing non-NASA building, including exterior spaces, or to acquire land. However, this limitation does not prevent eligible recipients (such as research and/or education organizations, museums, planetariums, parks, etc.) from using funds from a NASA grant or cooperative agreement to acquire equipment or to enhance, establish, and/or replace permanent NASA-related exhibits with total costs in excess of \$10,000. This limitation also does not prevent recipients from using grants or cooperative agreements for the design, fabrication (commonly called construction), delivery, and/or installation of a NASA-related-permanent exhibit; for installation and/or operation of fixed or permanent planetarium equipment; for outdoor exhibits such as solar system walks or Mars Rover yards; or for the delivery, installation, operation, and/or maintenance of permanent, large research equipment.
8. NASA Centers, NASA civil servants, facilities, and the Jet Propulsion Laboratory (JPL)¹ may not be recipients of a NASA grant, cooperative agreement, or subaward from a NASA grant or cooperative agreement recipient. However, NASA civil servants who

¹ JPL is NASA's only Federally Funded Research and Development Center. NASA funding transferred to JPL is required to be accomplished via task orders issued under the prime contract between the Agency and the California Institute of Technology (Caltech), under which Caltech operates JPL for NASA.

plan to perform research and/or collaborate with a recipient in support of an awarded grant or cooperative agreement may be funded for their efforts through the Agency's intra-agency funding transfer process.

5.0 Deviations

1. Deviations provide exceptions to award regulations, policies, or procedures when beneficial to either NASA or an award's goals or fiscal stewardship. When an award applicant or recipient requires an approval for an action that conflicts with NASA award regulations, policies, or procedures, the applicant or recipient may submit a deviation request to the NASA point of contact listed in the NOFO, their award's cognizant TO (if known), and the GO (if known), and NASA will route the deviation request through the proper review channels.
2. A deviation is required for any of the following:
 - a. When a prescribed term or condition set forth verbatim in the GCAM is modified in any way or omitted.
 - b. When a term or condition is set forth in NASA's standard [terms and conditions](#), but not for use verbatim, and the funding organization or GO substitutes a term or condition that is inconsistent with the intent, principle, and substance of the term or condition.
 - c. When a form prescribed by the GCAM is altered or another form is used in its place.
 - d. Where it is necessary to obtain an exception or deviation to 2 CFR 200, 2 CFR 1800, or the GCAM.
 - e. When a form is created for recipient use that constitutes a "Collection of Information" within the meaning of the Paperwork Reduction Act ([44 U.S.C. §3501](#)) and its implementing regulations at [5 CFR part 1320](#), Controlling Paperwork Burdens on the Public.

Chapter 1: Pre-award

This chapter outlines NASA's proposal requirements and submission guidelines.

All applicants applying to NASA for Federal financial assistance funding should adhere to the guidelines contained in this chapter. NASA funding organizations may publish NOFOs that modify the general provisions of the guidelines outlined in this chapter. In such cases, the guidelines in the NOFO must be followed.

The chapter also covers non-competitive grants and cooperative agreements.

6.0 Overview of NASA's Grant-funding Organizations

Those interested in NASA federal financial assistance opportunities may reference NASA's Assistance Listings available on [SAM.gov](https://sam.gov). The Federal Program Information Act ([Pub. L. 95-220](#)) requires the annual dissemination of Federal domestic assistance information through the Federal Assistance Listings, which is the single, authoritative, government-wide source of Federal financial assistance program information produced by the Federal Government. NASA must create an Assistance Listing for each program, and programs must be designed with clear goals and objectives that facilitate the delivery of meaningful results. Each NASA Assistance Listing must include, where appropriate, the information in 2 CFR § [200.203](#), Requirement to provide public notice of Federal financial assistance programs, which includes a program description, purpose, goals, objective, and measurement. Grant applicants may review NASA's Assistance Listings information on the SAM.gov webpages listed below:

- Science: [Assistance Listing number 43.001](#)
- Aeronautics: [Assistance Listing number 43.002](#)
- Exploration: [Assistance Listing number 43.003](#)
- Space Operations: [Assistance Listing number 43.007](#)
- Office of STEM Engagement: [Assistance Listing number 43.008](#)
- Mission Support: [Assistance Listing number 43.009](#)
- Space Technology: [Assistance Listing number 43.012](#)
- Congressionally Directed Programs: [Assistance Listing number 43.014](#)

Projects funded by NASA must align with the current version of the NASA Strategic Plan, program descriptions in the Assistance Listings outlined above, and the goals of the NOFO.

7.0 Overview of Systems

The NASA Solicitation and Proposal Integrated Review and Evaluation System ([NSPIRES](#)) is NASA's pre-award management system. Applicants, Principal Investigators (PI), and proposed team members are required to register in NSPIRES prior to the proposal due date. NSPIRES is the preferred system for proposal submissions. [Grants.gov](#) can be utilized for proposal submission for certain opportunities, provided that the NOFO specifies this. NOFOs are posted within NSPIRES as well so potential applicants can find agency announcements through this system. Proposers should familiarize themselves with NSPIRES and the system's [tutorials and user guides](#) well in advance of the proposal due date.

[Grants.gov](#) is a government-wide repository of funding opportunities for all Federal grant-making agencies and may be used to submit NASA grant applications. Potential applicants can view synopses of funding opportunities through [Grants.gov](#) as review historic funding opportunities that are not currently open for applications. A summary of information/synopsis is posted to [Grants.gov](#) for all NASA competitive funding opportunities, per 2 CFR § [200.204](#) and OMB Memo M-04-01, dated October 15, 2003.

[SAM.gov](#) is a government-wide registry of entities doing business with the Federal government. [SAM.gov](#) centralizes information about grant applicants and recipients as well as grant programs available throughout the Federal government. All entities applying for a NASA grant or cooperative agreement must be registered in [SAM.gov](#).

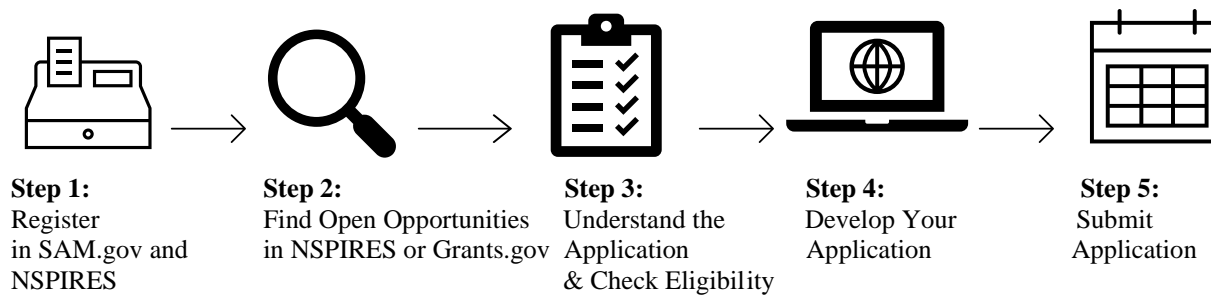
8.0 Grant Funding Opportunities

NASA releases competitive funding opportunities through NOFOs posted in [NSPIRES](#) and publishes synopses of these opportunities in [Grants.gov](#). NOFOs outline what is required for grant funding from NASA and can either be a standalone NOFO, meaning it funds one distinct type of project, or an omnibus NOFO which funds multiple types of projects.

Omnibus NOFOs set forth general requirements for a group of funding opportunities known as Appendices. Omnibus NOFOs provide the general rules and overall process for applicants to apply for grant or cooperative agreement funding through NASA Mission Directorates or offices. Examples are the Research Opportunities in Space and Earth Sciences (ROSES) omnibus NOFO and the Engagement Opportunities in NASA STEM (EONS) NOFO. Oftentimes, funding organizations only release standalone NOFOs, which do not include appendices, so the requirements for those programs are all encompassed in the standalone NOFO.

An appendix, also known as a program element, falls under an omnibus NOFO and is a distinct element within the omnibus NOFO with its own application requirements, eligibility, and submission timeframes. Appendices are housed in the larger omnibus NOFO, which means omnibus NOFOs typically are updated whenever there is a new program element available for funding or a change in an existing element.

9.0 Overview of Steps to Apply for NASA Grants



To apply for a NASA award, all applicants must:

1. Apply for, update, or verify their UEI with [SAM.gov](https://sam.gov);
3. Register for, update, or verify their SAM.gov account and ensure the account is active before submitting their application;
4. The Authorized Organizational Representative (AOR) for the entity listed in SAM.gov must register in [NSPIRES](https://nspires.gov). The organization and all team members listed in a proposal shall also register in NSPIRES (see section 9.1.3, Categories of Proposal Personnel, for more information);
5. Thoroughly read and review the NOFO to determine whether the entity meets the eligibility requirements to apply. If eligible, prepare the required elements of the application;
6. The AOR submits the application in NSPIRES or [Grants.gov](https://grants.gov), if applicable; and
7. Maintain an active and current SAM.gov registration throughout active period of performances (POP) for Federal awards or when an application is under consideration by NASA.

9.1 Registering in SAM.gov and NSPIRES

9.1.1 SAM.gov and UEIs

In accordance with [2 CFR 25](https://www.ecfr.gov/current/title-49/chapter-I/subchapter-A/part-25), Universal Identifier and System for Award Management, all entities that apply for or receive an award from NASA must be registered in [SAM.gov](https://sam.gov) prior to submitting their application, maintain an active SAM.gov registration with current information at all times during which it has an active Federal award or application under consideration, and provide its UEI in each application it submits to NASA. Applicants are required to review and update their information in the SAM.gov database annually from the date of initial registration or

subsequent updates to ensure it is current, accurate, and complete. If applicable, this includes identifying the applicant's or recipient's immediate and highest-level owner and subsidiaries, as well as providing information on all predecessors that have received a Federal award or contract within the last three years. [2 CFR § 25.110](#) outlines exceptions to the SAM.gov registration requirement in certain circumstances. Intended recipients must be registered and up to date on SAM.gov registration requirements in order to receive a NASA award.

2 CFR § [200.209](#), Certifications and representations, states that Federal agencies are authorized to require recipients to submit certifications and representations required by Federal statutes or regulations on an annual basis. OMB, in coordination with the Federal assistance community, developed standard Government-wide certifications and representations to be certified by recipients when registering in SAM.gov. This reduces the duplicative practice of Federal-awarding agencies requesting certifications and representations with the submission of each Federal financial assistance application.

A recipient shall not make a subaward to a subrecipient unless that subrecipient has obtained and provided a UEI to the recipient. Subrecipients are not required to complete a full SAM.gov registration to obtain a UEI. A recipient must notify any potential subrecipients that the recipient cannot make a subaward unless the subrecipient has obtained a UEI as described above.

9.1.2 NSPIRES Registration

Applicants, PIs, and proposed team members are required to register in [NSPIRES](#) prior to the application due date. NASA requires applicants to complete [NASA-specific certifications](#), assurances, and agreements in NSPIRES as part of the proposal submission process. Outlined below are categories of proposal personnel for which registration is required in order to create and submit a Notice of Intent, create and submit proposals, and view the status of the submitted proposal. Detailed instructions on how to register is located on the [NSPIRES help page](#).

All organizations, entities, institutions and/or individuals named in the proposal shall register in NSPIRES. NASA only issues awards to organizations (including sole proprietorships) and not to individuals. Therefore, NASA does not issue awards to a PI in their individual capacity. PIs participating in a proposal shall use the NSPIRES registration module to affiliate with an entity. Affiliation is a two-way relationship that requires the approval of the PI's organization. PIs should be aware that it may take time for entities to respond to requests for affiliations, which may introduce extra time into the proposal preparation and submission cycle. In addition, the organization's registration process in NSPIRES may take more than ten working days, depending on the organization. NASA may not evaluate proposals submitted via [Grants.gov](#) if the organization submits its proposal to Grants.gov without registering in NSPIRES.

A prerequisite for an entity registering in NSPIRES is registration in [SAM.gov](#). Therefore, NASA advises proposers to start the SAM.gov and NSPIRES registration processes well in advance of the proposal deadline. Applicants interested in applying to NASA, should register in

NSPIRES and SAM.gov regardless of whether there is a current NOFO of interest that has been released.

Registration for NSPIRES requires organizations to have the following:

- UEI (for additional information related to the UEI, visit the General Services Administration's frequently asked questions [webpage](#) on UEIs SAM.gov will generate UEIs for Federal award recipients.
- Valid registration with SAM.gov. An organization's electronic business point-of-contact shall perform SAM.gov registration.

Every individual named on the proposal's electronic proposal cover page form or in the Grants.gov forms as a proposing team member in any role, including Co-Investigators (Co-Is) and Collaborators, shall be registered in NSPIRES. Such individuals shall perform this registration themselves; second party registration is prohibited. The NSPIRES website is secure, and all information entered is strictly for internal NASA purposes only.

9.1.3 Categories of Proposal Personnel

Every identified individual expected to have a role in the execution of the proposed effort shall be identified on the proposal cover page, using the most appropriate personnel role described below. Prior to proposal submission via [NSPIRES](#), every individual named on the proposal's electronic cover page form as a team member (even Collaborators) must be registered in NSPIRES and confirm their commitment to that role. Team members will receive a confirmation email from NSPIRES indicating that they have been added to the proposal and must log into NSPIRES to corroborate. Through this electronic confirmation process, the organization through which they are participating in the proposal is also identified, to enable organizational conflict of interest (COI) checks that are required as part of the evaluation process. When submitting proposals through [Grants.gov](#), statements of commitment must be included in the proposal. Such confirmation of participation is not needed for unnamed personnel (e.g., students and postdoctoral associates). Any organization requesting NASA funds through participation in the proposed project shall list each team member on the proposal cover page. Other than the category of PI, some NOFOs may explicitly allow or disallow some or all of the below categories and/or may add other categories.

- **PI** – The PI is the individual whom an organization designates as having an appropriate level of authority and responsibility for the proper conduct of proposed work effort, including the appropriate use of funds and administrative requirements such as the submission of progress reports to the agency. Every proposal shall identify a PI who is responsible for the quality and direction of the proposed work effort and for the proper use of awarded funds regardless of whether the PI receives support through the award. The PI is the person with whom NASA will communicate and who will be responsible for relaying communications to other team members as needed. The proposing

organization has the authority to designate the PI and to designate a replacement if that becomes necessary. After the proposal selection, the replacement of a PI requires NASA's prior written approval.

- **Co-Principal Investigator (CoPI)** – CoPIs, together with the PI, share the responsibilities for and will work together to oversee the project. CoPIs are affiliated with U.S. organizations. Individuals affiliated with non-U.S. organizations may be designated “Co-I/CoPI [non-U.S. organization only]” in NSPIRES. While all CoPIs and the PI are jointly responsible for milestones, deliverables, appropriate use of funds, and administrative requirements, NASA will generally communicate with the PI. If a CoPI is not affiliated with the submitting organization, CoPI input on the use of funds will be subject to the corresponding subcontract/subaward, and clear responsibilities, actions, and deliverables for the CoPIs must be detailed in the roles and responsibilities narrative. NASA awards are generally made to the PI’s organization. However, in some cases, NASA may elect to provide a separate award directly to the CoPI’s organization. In such cases, the CoPI would serve as the “PI” for this separate award to their organization and also would retain their responsibilities as CoPI on the originating project, if mutually agreed upon.

NASA strongly encourages PIs to specify only the most critically important personnel to aid in executing the proposed work efforts. Such personnel shall be designated as being in one of the following categories:

- **Co-I** – A Co-I is a member of the team who is a critical "partner" for the conduct of the investigation through the contribution of expertise and/or capabilities. A Co-I will serve under the direction of the PI or a CoPI and generally will have a continuing role in the proposed investigation. The Co-I may or may not receive funding through the award. In NSPIRES the PI may also designate one of the following roles for a Co-I who will carry additional responsibilities, as appropriate for the following unique circumstances:
 - One Co-I may be designated as the "Science PI" (i.e., Co-I/Science PI) if the proposing organization does not permit that individual, affiliated with that organization in NSPIRES, to formally serve as a PI as defined above (e.g., non-tenured faculty, postdoctoral personnel). In such a case, the Co-I/Science PI oversees the scientific direction of the proposed work, although the formally designated PI still will be responsible for the overall direction of the effort and proper use of funds.
 - A Co-I at an organization other than that of the PI’s or CoPI’s institution(s) who is a major contributor to the proposal (e.g., providing a significant piece of hardware or overseeing a single specific aim carried out in full at a partner institution) and who serves as the point of contact at that Co-I’s organization, may also be designated as the "Institutional PI" (i.e., Co-I/Institutional PI) for that Co-I’s organization. If stated explicitly in the NOFO, NASA may elect to provide a separate award directly to the organization of the Co-I. In this case, the Co-I will serve as the “PI” for this separate award for their organization. This role contrasts with the CoPI’s role due to the scope

of responsibility. That is, PIs and CoPIs have oversight and responsibility over the entire project, including administrative tasks, whereas the Co-I/Institutional PI oversees significant efforts at their institution that are more limited in scope.

- A Co-I from a non-U.S. organization may also be designated as a CoPI (i.e., Co-I/CoPI [non-U.S. organization only]) if such a designation is required to fulfill administrative requirements of that Co-I's organization and/or to enable the acceptance of funding by that Co-I from their sponsoring funding authority. Non-U.S. team members may not use the CoPI role in NSPIRES and instead must use the "Co-I/ [non-U.S. organization only]" role if appropriate.
- **Collaborator** – A Collaborator is an unfunded individual who is not critical to the proposed effort but committed to providing a focused but unfunded contribution for a specific task. If funding support, including travel costs, is requested in the proposal, such individual shall be identified in one of the other categories described in this section. For a proposal submitted via Grants.gov, Collaborators shall be listed on the Project Role "Other" line of the Senior/Key Person portion of the SF 424 (R&R) [form](#).
- **Postdoctoral Associate** – A Postdoctoral Associate holds a Ph.D. or equivalent terminal degree, is identified as a major contributor (but not explicitly as a Co-I) for the execution of the proposed work effort, and receives funding through the proposal's budget. Postdoctoral Associates shall be identified by name, if known, but may be identified only by their designated function in those cases where recruitment depends on the successful selection of the proposal. Postdoctoral Associates need not be named on the proposal cover page, but their effort(s) shall be included in the technical description of work assignments and the proposed budget.
- **Other Professional** – This category is appropriate for an individual who supports a proposal in a critical manner, e.g., a key Project Engineer and/or Manager, but who is not identified as a Co-I or Postdoctoral Associate. This individual's role in the proposal shall be described in the budget narrative.
- **Graduate and/or Undergraduate Students** – A proposal may incorporate students working for graduate or undergraduate degrees who will be paid through the proposal's budget to help carry out the proposed work effort under the direction of the PI, a CoPI, or one of the designated Co-Is. Such students shall be identified by name, if known, but also may be identified only by function in those cases where their recruitment depends on the successful selection of the proposal. Student name(s) are not required on a proposal's cover page, but their effort(s) shall be included in the technical description of work assignments and the proposed budget.
- **Consultant** – A consultant is an individual who possesses a special skill, receives a fee for their services, which may include travel to consult with the PI or another member of the team, and is not an officer or employee of the proposing organization. A consultant provides services that support the proposed activities but is not responsible for project

oversight and completion. As compared to a Co-I who is actively engaged in the proposed activities, a consultant provides information, advice, engages in discussions, and serves as a resource—a person with whom the PI, CoPI (if applicable), and Co-Is confer. The proposal's budget shall include the identification, justification, and complete breakdown of all costs proposed for all consultants.

9.2 Finding Open Funding Opportunities

NASA posts funding opportunities in [NSPIRES](#) and synopses of these opportunities on [Grants.gov](#). NOFOs detail the goals of the program, how an application will be reviewed, funding amounts, eligibility criteria, among other critical program information.

In addition to searching for and becoming familiar with open funding opportunities, interested applicants should familiarize themselves with the systems and Mission Directorate information provided in sections 6.0, Overview of NASA's Grant-funding Organizations, and 7.0, Overview of Systems, of this Manual. Proposers should also familiarize themselves with the most recent [NASA Strategic Plan](#) as funding opportunities often require proposers to explain their project's connection to aspects of the NASA Strategic Plan.

If proposed activities are related to the education field, proposers are also responsible for submitting proposals relevant to the latest [Federal STEM Education Five-Year Strategic Plan](#), which is a report from the Committee on STEM (Co-STEM) Education of the National Science and Technology Council.

9.3 Application Requirements and Checking Eligibility

NOFOs provide information on program objectives and requirements, eligibility, and other critical elements so NOFOs should be read in their entirety prior to preparing the proposal. Applicants must address the objectives listed in the NOFO and articulate how their proposal plans to accomplish the goals of the funding opportunity.

The proposing organization type shall be identical to that listed in [SAM.gov](#) and tied to the UEI. The designation of one of the following organizational categories is required on the proposal cover page. Categories of organizations that may be eligible for NASA grants and cooperative agreements include:

- **Institutions of Higher Education (IHE)** – A two- or four-year university or college (including U.S. community colleges), public or private, accredited to confer degrees beyond that of the K-12 grade levels.

- **Educational Institutions** – Non-higher-education entities, such as K-12 education groups or institutions of informal education, are classified as Educational Institutions.²
- **Non-profit Organization** – An organization that:
 - Is operated primarily for scientific, engineering, educational, research, or similar purposes in the public interest;
 - Is not organized primarily for profit;
 - Uses net proceeds to maintain, improve, or expand the organization’s operations; and
 - Is not an IHE.

Non-profit organizations generally exclude (i) colleges and universities; (ii) hospitals; and (iii) state, local, and Federally recognized Indian tribal governments.

- **For-profit Entity** – An organization of any size that is organized primarily for profit.
- **Federally Funded Research and Development Center (FFRDC)** – FFRDCs are under a broad charter by a Government agency for performing, analyzing, or conducting research for the United States Government. NASA sponsors JPL as the Agency’s sole FFRDC, and JPL is not an eligible applicant to receive a NASA-funded grant or cooperative agreement as a recipient or subrecipient³. However, FFRDCs sponsored by agencies other than NASA may be eligible to receive a NASA-funded award as a recipient or subrecipient.
- **Non-U.S. Organizations** – Organizations outside the U.S. that meet the definitions of foreign organization or foreign public entity in 2 CFR § [200.1](#). Non-U.S. organizations generally propose for opportunities on a no-exchange-of-funds basis in accordance with NASA policy. NOFOs may be issued jointly with a non-U.S. organization (e.g., those concerning guest observing programs for jointly sponsored space science programs) that will contain additional special guidelines for non-U.S. participants.
- **State, Local, or Federally-Recognized Tribal Government Agency** –
 - **State Government** means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, any territory or possession of the United States, and any agency or instrumentality of a State exclusive of its local governments.

² Since NSPIRES does not have a listing for Educational Institutions, institutions falling under this category shall propose as non-profit or commercial organizations or as agencies of state, local, or federally- recognized tribal governments as described below.

³ NASA funding transferred to JPL is required to be accomplished via task orders issued under the prime contract between the Agency and the California Institute of Technology (Caltech), under which Caltech operates JPL for NASA.

- **Local Government** means a county, municipality, city, town, township, local public authority, school district, special district, intrastate district, council of governments (whether or not incorporated as a non-profit corporation under state law), any other regional or interstate government entity, or any agency or instrumentality of a local government.
- **Federally-Recognized Indian Tribal Government** means the governing body or a governmental agency of any Indian Tribe, band, nation, or other organized group or community (including any native village as defined in Section 3 of the [Alaska Native Claims Settlement Act](#), 85 Stat. 688) certified by the Secretary of the Interior as eligible for the special programs and services provided through the Bureau of Indian Affairs.

While the [NSPIRES](#) cover page does not offer subcategory organization types, NOFOs may further specify a subset of the general types listed above as part of the eligibility criteria (e.g., museums or public K-12 schools).

Per federal statutes and NASA policy, no eligible applicant shall experience exclusion from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving financial assistance from NASA on the grounds of their race, color, religion, age, sex, national origin, or disability.

9.4 Proposals Involving Non-U.S. Organizations

Unless under exceptional circumstances, per 2 CFR § [1800.3\(c\)](#), NASA does not fund foreign research proposals from foreign organizations or foreign public entities, nor efforts by individuals at foreign organizations as part of U.S. research proposals. This policy pertains to the proposing organization and not the nationality or citizenship of the individuals listed in the proposal. This includes subawards from U.S. organizations to investigators at foreign organizations and travel by individuals at foreign organizations to conduct research, fieldwork, and present at conferences. Rather, each country agrees to bear the cost of discharging its respective responsibilities (i.e., the work to be done by team members affiliated with organizations in their country). The direct purchase of supplies and/or services, which do not constitute research, from non-U.S. sources by U.S. award recipients is permitted.

NASA welcomes proposals from non-U.S. organizations and proposals that include the participation of non-U.S. organizations, under conditions consistent with 2 CFR § 1800.3. Proposals submitted by a U.S. organization that include research to be performed by a non-U.S. organization or with a non-U.S. organization are normally supported on a no-exchange-of-funds basis. NASA's policy on performing research with foreign organizations on a no-exchange-of-funds basis is set forth at NASA FAR Supplement [1835.016](#). In addition, proposals that include the participation of China or any Chinese-owned company are ineligible to receive an award, except to the extent NASA has notified the proposer that NASA has sought a waiver for such

activities pursuant to Pub. L. 118-42 Sec. 526. For the assurance and representation on China restrictions, see [Appendix A](#), section A3, of this Manual.

10.0 Developing an Application

Applicants must follow directions outlined in the NOFO. NASA requires electronic submission of proposals and does not accept paper copy proposals. Applicants seeking a waiver in the electronic submission requirement process shall follow guidance in [Appendix B](#) of this Manual, and applications must be received by the application deadline.

The standard formats for all types of proposals are below:

- Page size shall be 8.5x11 inches.
 - Pages shall have at least 1-inch (2.5 cm) margins on all sides.
 - Adhere to the page limits listed in the NOFO.
- Single-spaced, in 12-point font, English-language text, and formatted using one column.
 - Font size for symbols in equations shall be consistent with this guideline.
 - Figure and table captions shall follow the same font requirements and restrictions as the main proposal text.
 - Proposers shall not change the default settings to circumvent page limit requirements.
- While superscripts, subscripts and text within figures and tables may use a smaller font, the text shall, in the reviewers' judgment, be legible without magnification.
- Expository text necessary for the proposal may not be located solely in figures or tables, or in their captions.
- Proposals shall utilize units that are standard for the relevant discipline.
- Fold-out pages, illustrations, and/or photographs are allowed for the display of unique and critically essential proposal data. Fold-out pages will count as multiple pages, dependent on the number of fold-out sections, against the required page limit. For example, a three-section fold-out is considered equal to three pages counted towards the page limitation.
- Only non-substantive proposal material, e.g., page numbers, section titles, disclaimers, are permitted in headers and footers.

- Proposals shall include references to published papers and other products to demonstrate, for example, that the methodology has passed peer review, but shall not include references to materials outside the proposal (e.g., published articles and sites on the internet) for information or material needed to either complete or understand the proposal. Peer reviewers have no obligation to read materials outside of the proposal.

Proposals shall be assembled according to the sections in the following table in the order shown and within the listed page limits. NASA may reject proposals without review that omit required sections or exceed the page limits. A description of each section follows this table.

Table 1 – Required Proposal Elements

Required Parts of a Proposal (In Order of Assembly)	Page Limit
Proposal Cover Page (NSPIRES web forms or Grants.gov forms) including: <ul style="list-style-type: none"> Proposal Summary – limit to 4,000 characters (including spaces) NSPIRES cover page budget Proposal team members Other required elements 	Constrained by NSPIRES and Grants.gov
Table of Contents	As needed
Scientific/Technical/Management (S/T/M) Plan	15 ⁴
References and Citations	As needed
Biographical Sketches for covered individuals	As needed
Current and Pending (Other) Support for covered individuals	As needed
Statements of Commitment and Letters of Support	As needed
Proposal Budget (budget) – both the budget narrative and budget details ⁵	As needed
Facilities, Equipment, and Other Resources	As needed
Table of Personnel and Work Effort	As needed
Data Management Plan	As prescribed in the NOFO.

⁴ This page limit includes all illustrations, tables, and figures, where each "n-page" fold-out counts as n-pages and each side of a sheet containing text or an illustration counts as a page. This page limit may be superseded by instructions in the NOFO.

⁵ NOFOs may require more information in a separate section.

	Unsolicited Proposals Include this on the Cover Page.
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A GO also may request that an applicant submit a [NASA Form 1206](#). If requested, recipients will submit the form to NASA via email rather than through [NSPIRES](#). See section 16.13.2, NASA Form (NF) 1206, for more information. Note that as of January 2025 the NF 1206 is currently undergoing an update, and NASA will not request the NF 1206 from applicants or recipients until those updates have been completed.

10.1 Proposal Cover Page

Proposers submitting proposals through [NSPIRES](#) are required to submit required information generated by the system. The NSPIRES web interface will prompt the proposer for basic information at the time of proposal creation, such as proposal title and organizational affiliation of the PI, and it will permit the PI to choose team members, assign their roles and access, and enter budget information. NSPIRES will then generate the cover page based on information that the applicant enters into NSPIRES. One or more (per the NOFO) PDF files shall be uploaded to complete the proposal assembly. Once the PI completes the assembly, the AOR shall access the proposal in NSPIRES and submit it electronically.

Proposers applying to a NOFO and submitting through [Grants.gov](#) shall complete the required Grants.gov [forms](#), including the SF 424 (R&R) Application for Federal Assistance, R&R Other Project Information, R&R Senior/Key Person Profile, and R&R Budget. Additionally, proposers shall complete the required NASA-specific forms: NASA-Other Project Information, NASA-PI and Authorized Representative Supplemental Data Sheet, and the Program Specific Data and Proposal Summary PDF forms. These last two forms are part of the instructions file provided for every NOFO on Grants.gov. The required PDF file(s) shall also be provided, per the Grants.gov instructions. These forms contain elements that will be combined to form the proposal cover page once the forms are transcribed and transferred into the NSPIRES system, which will occur post-submission.

10.1.1 Proposal Summary/Abstract

The proposal summary or abstract, an element of the cover page, requires proposers to provide a proposal summary of up to 4,000 characters (including spaces and invisible control characters if cutting and pasting from Microsoft Word) that provides an overview of the proposed effort. The proposal summary should include in plain language the purpose of the project, activities to be performed, expected outcomes and intended beneficiaries, and subrecipient activities if known at the time of application. This proposal summary or abstract will be publicly accessible if the proposal is selected, so it shall not contain any proprietary data or information that should not be

publicly released (e.g., International Traffic in Arms Regulations (ITAR)-controlled data). The proposal summary shall be concise and not contain any special characters or formatting. The proposal summary is an NSPIRES cover page element that is auto-populated based on what is submitted by the PI. [Grants.gov](https://www.grants.gov) users shall use a writeable PDF form (downloadable as part of the NOFO instructions zip file from Grants.gov) named “proposalsummary.pdf” to submit this document. The proposal summary document is limited to 4,000 characters (including spaces).

10.2 Table of Contents

The Table of Contents element of the grant proposal assists NASA and application reviewers in the review of the application. Proposers shall include a Table of Contents that provides a guide to the organization and contents of the proposal.

10.3 Scientific/Technical/Management Plan

As the main body of the proposal, this section shall cover the following topics, all within the specified page limit. This section, shall address:

- The goals and expected significance of the proposed work. Proposers must tie their project to the objectives in the NOFO or to present or future NASA programs and interests as outlined in the [NASA Strategic Plan](#) and documents from the soliciting directorate, or office. This may include the [Science Strategy](#), the [Strategic Technology Investment Plan](#), the [NASA Aeronautics Strategic Implementation Plan](#), and/or the [NASA Strategy for STEM Engagement](#).
- The impact of the proposed work to the state of knowledge in the field. If the proposal is submitted as a successor to an existing NASA award, the proposal shall also include how the proposed work expects to build upon and extend the previous accomplishments that NASA has supported.
- The technical approach and methodology to be employed in conducting the proposed work, including:
 - Proposed experimental designs, methods, techniques, and approaches for achieving the goals and objectives of the NOFO;
 - A description of any hardware or software development, construction, or fabrication required to carry out the effort;
 - Sources of error and uncertainties and what effect they may have on the robustness of potential results or conclusions;

- The resilience of the approach and methodology, e.g., complementary measurements, confirming tests, and likely pitfalls of various approaches;
- Any special capabilities and advantages of facilities and equipment (a basic description list is in the facilities and equipment section);
- Technical approach and methodology impact on the budget⁶; and
- The flow of the different tasks and how they feed into one another.
- A general implementation plan, including:
 - A project schedule that identifies anticipated key milestones for accomplishments and dependencies between tasks;
 - The management structure for the proposed personnel;
 - Any substantial collaboration(s);
 - Any proposed use of consultant(s); and
 - A description of the expected contribution to the proposed effort, by task and sub-task, by the PI and each person identified in one of the additional categories set forth in section 9.1.3, Categories of Proposal Personnel, regardless of whether they derive support from the proposed budget, but not including the information required in the table of personnel and work effort.

The S/T/M Plan section may contain illustrations and figures that amplify and demonstrate key points of the proposal (including milestone schedules, as appropriate). However, illustrations and figures shall be of an easily viewed size and resolution and have self-contained captions that do not contain critical information not provided elsewhere in the proposal.

Proposers must spell out all acronyms the first time they are used in the proposal's S/T/M Plan. Proposers may provide an acronym list as a supplement only if the acronyms are already spelled out within the plan itself.

10.4 References and Citations

All references and citations provided in the S/T/M Plan shall use easily understood and standard abbreviations for journals, and complete names for books. Also, it is highly preferred, but not required, that these references include the full title of the cited paper or report.

⁶ See the proposal budget section for further discussion of costing details needed for proposals involving significant hardware, software, and/or ground systems development, and, if allowed by a NOFO, proposals for flight instruments.

10.5 Biographical Sketches

1. *Purpose.* A biographical sketch documents an individual’s qualifications and professional experience, and the information is used to assess how well qualified an individual is to conduct proposed award activities. Each senior/key person listed on a NASA grant or cooperative agreement proposal is required to submit biographical sketch disclosures with their application.
2. *Senior/key persons.* Per National Security Presidential Memorandum 33 (NSPM-33), a “senior/key person” is defined as an individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned.
 - a. NASA will designate as a covered individual any PI (regardless of level of effort), any CoPI (regardless of level of effort), and only Co-Is proposing to spend ten percent or more of their time in any given year on a NASA-funded award.
 - b. NASA funding organizations may designate additional personnel categories as covered individuals on a project-by-project basis, and these designations will be explicitly stated in all NOFOs.
3. *Submission.* Each senior/key person is responsible for preparing, signing, and submitting a biographical sketch form as part of their proposal. The form is available on the NASA PGPD/GPC [website](#). There is no page limit to the biographical sketch form, and all data elements marked as required shall be submitted to NASA using the form. Senior/key personnel have the option to provide their Persistent Identifier in the “Persistent Identifier (PID)⁷ of the Senior/Key Person” section of the form.
 - a. Applicants are encouraged to digitally sign their disclosure forms. However, if a form with a digital signature is submitted to NASA via [NSPIRES](#), processing performed by the system to generate versions suitable for proposal review will remove the cryptographic data associated with that digital signature. The signature field (e.g., name and date) will still be completed and visible, but NASA will not be able to view any cryptographic data embedded in the form. As such, award recipients shall maintain original forms in accordance with their entity’s record keeping policies and make them accessible to NASA in accordance with 2 CFR § [200.334](#), Retention requirements for records, and § [200.337](#), Access to records.
4. *Disclosure table.* A table entitled [NASA Pre-award and Post-award Disclosure Requirements](#) provides helpful reference information regarding pre-award and post-award

⁷ Senior/key persons are encouraged to utilize PIDs that meet the common/core standards for PID services as described in [Guidance for Implementing National Security Presidential Memorandum 33 \(NSPM-33\) on National Security Strategy for United States Government-Supported Research and Development](#).

disclosures. The table includes the types of activities to be reported, where such activities must be reported in the application, as well as when updates are required in the application and award life cycle. A final column identifies activities that are not required to be reported.

5. *Failure to disclose.* If an entity discovers that a senior/key person has failed to disclose reportable information in accordance with this section, then the entity shall notify NASA within 30 calendar days per their award's terms and conditions. Upon receipt of the information, NASA will consult with the entity as necessary and take appropriate action.

10.6 Current and Pending (Other) Support Disclosures

1. *Purpose.* Current and pending (other) support information is used to assess the capacity of senior/key personnel to carry out proposed award activities and helps NASA assess any potential scientific and budgetary overlap or duplication, as well as conflicts of commitment⁸, with the proposed project. Each senior/key person listed on a NASA grant or cooperative agreement proposal is required to submit current and pending support disclosures with their application.
2. *Senior/key persons.* Per NSPM-33, a “senior/key person” is defined as an individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned.
 - a. NASA will designate as a covered individual any PIs (regardless of level of effort), any CoPIs (regardless of level of effort), and only Co-Is proposing to spend ten percent or more of their time in any given year on a NASA-funded award.
 - b. NASA funding organizations may designate additional personnel categories as covered individuals on a project-by-project basis, and these designations will be explicitly stated in all NOFOs.
3. *Submission.* Each senior/key person is responsible preparing, signing, and submitting a current and pending (other) support form as part of their proposal. The form is available

⁸ “Conflict of commitment,” or “COC”, means a non-financial COI in which an individual accepts or incurs conflicting obligations, whether domestic or foreign, between or among multiple employers or other entities. COC includes conflicting commitments of time and effort, including obligations to dedicate time in excess of institutional or funding agency policies or commitments. COC also includes obligations to improperly share information with, or to withhold information from, an employer or NASA, as well as other conflicting obligations that threaten research security and integrity. Examples of potential COC include, but are not limited to, current or pending employment; positions, appointments, or affiliations such as titled academic, professional, or institutional appointments, whether remuneration is received and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary positions); and participation in or applications to foreign government-sponsored talent recruitment or similar programs.

on the NASA PGPD/GPC [website](#). There is no page limit to the current and pending support form, and all data elements marked as required shall be submitted to NASA using the form. Senior/key personnel have the option to provide their Persistent Identifier in the “Persistent Identifier (PID) of the Senior/Key Person” section of the form.

- a. Applicants are encouraged to digitally sign their disclosure forms. However, if a form with a digital signature is submitted to NASA via NSPIRES, processing performed by the system to generate versions suitable for proposal review will remove the cryptographic data associated with that digital signature. The signature field (e.g., name and date) will still be completed and visible, but NASA will not be able to view any cryptographic data embedded in the form. As such, award recipients shall maintain original forms in accordance with their entity’s record keeping policies and make them accessible to NASA in accordance with 2 CFR § 200.334, Retention requirements for records, and § 200.337, Access to records.
4. *Disclosure table*. A table entitled [NASA Pre-award and Post-award Disclosure Requirements](#) provides helpful reference information regarding pre-award and post-award disclosures. The table includes the types of activities to be reported, where such activities must be reported in the application, as well as when updates are required in the application and award life cycle. A final column identifies activities that are not required to be reported.
5. *Failure to disclose*. If an entity discovers that a senior/key person has failed to disclose reportable information in accordance with this section, then the entity shall notify NASA within 30 calendar days per their award’s terms and conditions. Upon receipt of the information, NASA will consult with the entity as necessary and take appropriate action.

10.7 Statements of Commitment and Letters of Support

Every CoPI, Co-I, and Collaborator identified as personnel on the proposal’s cover page and/or in the proposal’s S/T/M Plan shall acknowledge their intended participation in the proposed effort. This acknowledgement of commitment is completed through [NSPIRES](#).

Proposers shall include participation statements in the body of the proposal if:

- Team members are unable to confirm their participation through NSPIRES;
- Proposers are required to do so by the NOFO; or
- A proposer is submitting its proposal through [Grants.gov](#).

Each written statement shall address the PI, may be a facsimile of an original statement or the copy of an email (the latter shall have sufficient information to identify the sender unambiguously), and is required even if the CoPI, Co-I, or Collaborator is from the proposing

organization.

An example of such a statement follows:

“I (we) acknowledge that I (we) am (are) identified by name as CoPI(s), Co-Investigator(s) [and/or Collaborator(s)] to the investigation, entitled <name of proposal>, that is submitted by <name of PI> to the NASA funding announcement<alpha-numeric identifier>, and that I (we) intend to carry out all responsibilities identified for me (us) in this proposal. I (we) understand that the extent and justification of my (our) participation, as stated in this proposal, will be considered during peer review in determining in part the merits of this proposal. I (we) have read the entire proposal, including the management plan and budget, and I (we) agree that the proposal correctly describes my (our) commitment to the proposed investigation.” To conduct work for this investigation, my participating organization is <insert name of organization>.”

Letters of support are only required if there is a facility or resource essential to the implementation of the proposal that a proposal team member does not have guaranteed access to. By submitting a statement of commitment, the team member confirms that any facilities or resources needed for the proposal are readily available for the proposal team members(s) who require its use.

If the proposal involves the conduct of research by a non-U.S. organization, the proposer shall include a signed letter(s) of certification. Such letters shall verify that funding for the research will be provided by a responsible organization(s) or federal government agency(ies) if NASA selects the proposal. An authorized official of the organization or federal agency shall sign the letter of certification to make such a commitment.

Statements of commitment and letters of support do not include “letters of affirmation” (i.e., letters that endorse the intrinsic merit, including significance or impact, of a proposal). NASA neither solicits nor evaluates such affirmations or endorsements for proposals. NASA determines, with input from the peer review panel, whether a proposal fully meets the evaluation criteria.

10.8 Proposal Budget: Budget Narrative and Budget Details

The proposal budget consists of two parts: 1) the budget narrative, and 2) the budget details. Each proposal shall provide a proposed budget for each year of the proposed effort supported by an appropriate budget narrative and specifics.

10.8.1 Proposal Budget

The proposal budget consists of two parts: 1) the budget narrative, and 2) the budget details. Each proposal shall provide a proposed budget for each year of the proposed effort supported by an appropriate budget narrative and specifics. There shall be a direct parallel between the items described in the budget narrative (written description of purchase), those set forth in the budget details (actual estimates of costs, in whole dollars, for the purchase), and the figures entered in the proposal cover page/[Grants.gov](https://www.grants.gov) forms.

- All proposers from U.S. organizations shall submit thorough budget details (see below for instructions for non-U.S. proposers with U.S. Co-Is);
- All proposed costs shall be related to the project and scope of work; and
- All proposed costs shall be allowable, allocable, and reasonable.
 - Allowable costs must be necessary and reasonable for the performance of the award and conform to any limitations in a NOFO, this Manual, 2 CFR, or the FAR (for awards to for-profit entities).
 - Allocable costs means that the budgeted item is chargeable or assignable to the award in accordance with relative benefits received.
 - Reasonable costs are costs that do not exceed what a prudent person would typically spend on a given item at the time the decision was made to incur the cost.

The NOFO may describe the availability or limitation on funds for a proposer's potential NASA partner (e.g., civil servants, salaries, travel, facilities). If the NOFO provides instructions on how to request a budget for a NASA Center or facility, proposers shall list NASA personnel by name on the NSPIRES cover sheet as team members and any non-key-personnel costs under other direct costs as consulting services, subawards, equipment, etc., as appropriate.

The proposed budget shall include an itemized list detailing expenses within major budget categories, detailed subawards, and a summary of personnel (see section 10.8.3, Budget details, for more information). The Table of Personnel and Work Effort (Table) shall immediately follow the proposal budget; however, the Table is not to be included in the budget.

10.8.2 Budget Narrative

The budget narrative shall:

- Cite the basis of estimations and rationales for each proposed component of cost, including direct labor, equipment, subawards, consultants, tuition, other direct costs (including travel), and facilities;

- Present the rationale for planned work commitments set forth in the table of personnel and work effort based upon the assigned tasks;
- Provide the source of cost estimates (e.g., based on quote, previous purchases for same or similar item(s), cost data obtained from internet research) including the company name and/or URL and date, if known, but the actual price quote or screen captures from the website do not need to be included;
- Explain the purpose of any proposed travel concerning the award and provide the basis of the cost estimate, which may include but is not limited to the following:
 - Destination (if the destination is not known, the narrative shall include reasonable assumptions about the potential destination and use historical cost data based on previous trips taken or conferences attended),
 - Number of travelers;
 - Number of days;
 - Conference fees;
 - Airfare;
 - Per diem (e.g., lodging, meals, incidentals); and
 - Miscellaneous travel expenses (e.g., car rental, airport parking).

The budget narrative shall not include any information that belongs in the S/T/M Plan.

10.8.3 Budget Details

Budget details are required in a proposal and are the actual or estimated costs attributed to the project. These are complemented by the budget narrative outlined in section 10.8.2, Budget Narrative. In this section, proposers shall break out the costs, for the items listed in the general budget found on the proposal cover page. Applicants should reference regulations in 2 CFR 200, [Subpart E](#), which govern allowable and unallowable costs for grants, in order to submit a compliant budget. Grants and cooperative agreements shall not provide for the payment of fee or profit to the recipient. Costs may be charged as either direct costs or indirect costs in accordance with 2 CFR 200 Subpart E depending on their identifiable benefit to a particular project or program, but all costs must be treated consistently for all work of the organization under similar circumstances, regardless of the source of funding. For information on indirect costs see section 22.0, Indirect Costs.

The following information shall be included in the budget details:

- **Direct Labor (salaries, wages, and fringe benefits):** A list of the names and titles of personnel, level of effort for each position, and rates of pay. The annual salary shall be clearly noted for each position. Labor shall clearly be broken out from fringe benefits. The fringe benefit rate/percent shall be clearly noted on the budget for each labor category for ease of review. An unidentified team member may be identified only by its designated function along with the level of effort and estimated rate of pay.

When determining the allowability of salary for faculty members at Institutions of Higher Education, grant recipients shall comply with 2 CFR § [200.430\(h\)\(2\)](#). As outlined in this section, unless there is a prior approval by NASA, charges of a faculty member's salary to a NASA award must not exceed the proportionate share of the Institutional Base Salary (IBS) for the period during which the faculty member worked on the award.

- **Fringe rates:** In accordance with 2 CFR § [200.414](#), Indirect (F&A) costs, NASA is required to apply the applicable negotiated rate for all grants and cooperative agreements awarded to the recipient. If fringe benefits comprise part of that negotiated rate, NASA will use this rate for all grants and cooperative agreements awarded to the recipient. If a proposing organization does not have a negotiated rate for fringe benefits, recipients shall use their rates for fringe benefits that are applied to funds from all funding sources. When a rate agreement contains language similar to: "use the same rates and conditions as those cited for fiscal year ending ..." or has "until amended" after the last fiscal year, the entity should be proposing those rates cited until a new rate agreement is received. In such cases, NASA does not accept escalation of the last cited rates.
- **Subawards:** Detail the work to be sub-awarded, estimated amount, and the recipient (if known). Itemized budgets are required for all subawards, regardless of dollar value.
- **Consultants:** Identify consultants to be used and provide the amount of time they will spend on the project and rates of pay to include annual salary, and overhead.
- **Equipment:** List all equipment items separately. See 2 CFR § [200.1](#), Definitions, for a definition of equipment.
 - All capital expenditures must be outlined. NASA generally does not fund general purpose equipment, buildings, and land. Capital expenditures for special purpose equipment may be allowable as direct costs, subject to the review and approval of the Grants Officer. Proposers may reference 2 CFR § [200.1](#), Definitions, for both special purpose and general purpose equipment.
- Equipment and other capital expenditures are unallowable as indirect costs.
- **Supplies:** Provide general categories of needed supplies, the method of acquisition, and the estimated cost.

- **Travel:** Provide a detailed breakout of costs for any proposed travel. If the destination is not known, the narrative shall provide reasonable assumptions about the potential destination and, use historical cost data based on previous trips taken or conferences attended. Detailed budget data shall include, but is not limited to the following, as applicable:
 - Destination;
 - Number of travelers;
 - Number of days;
 - Conference fees;
 - Airfare;
 - Per diem; and
 - Miscellaneous travel expenses (car rental, airport parking, etc.).

Every effort shall be made to estimate and detail travel costs accurately. Missing or minimum data is not acceptable for budget evaluation and award purposes. If destinations are not known at the time of proposal preparation, use reasonable assumptions and historical data for destinations and length of stay, however, use current pricing for the applicable categories listed above.

- **Tuition:** Provide basis of estimate for tuition costs such as tuition remission percentage applied or semester rates per hour.
- **Other:** List and enter the total of direct costs not covered in the above sections.
- **Facilities and Administrative (F&A)/Indirect Costs:** Identify F&A cost rate(s) and basis(es) as approved by the cognizant Federal agency, including the effective period of the rate. Provide the name, address, and telephone number of the Federal agency official having cognizance. If approved audited rates are not available, provide the computational basis for the indirect expense pool and the corresponding allocation base for each proposed rate. All budgets shall be prepared using the most current “approved” indirect rates for estimating and award purposes. Proposers shall not use unapproved “future” rates.

For grants and cooperative agreements: Any recipient that does not have a current negotiated indirect cost rate, except for recipients described in 2 CFR 200, [Appendix VII](#), paragraph D.1.b, may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC) which may be used indefinitely. For all types of institutions

other than institutions of higher education, if the negotiated rates change throughout the POP, the grant recipient shall apply the adjusted rate to any direct funds expended during the timeframe stated on the modified agreement.

F&A costs are not permitted for fellowship and scholarship awards per the definition of “Modified Total Direct Costs” in 2 CFR § [200.1](#), Definitions.

- **Other Applicable Costs:** Enter the total amount, explaining the need for each item and itemized lists detailing expenses within significant budget categories. Also, enter the required funding for any Co-Is who cannot be funded as a subaward (e.g., because the PI is from a non-Government organization and a Co-I is from a federal government organization)
- **Subtotal-Estimated Costs:** Enter the sum of all items.
- **Cost Sharing:** Neither [NSPIRES](#) nor [Grants.gov](#) allows for notating cost-sharing on the standardized budget form. However, if cost-sharing is proposed, it shall be discussed in detail in the budget narrative. Further, if cost-sharing is based on specific cost items, identify each item and amount in the budget detail with a full explanation provided in the Budget Narrative.

Cost-sharing is only required if stated in the NOFO. However, NASA may accept cost-sharing from any organization if it is voluntarily offered (2 CFR § [200.306](#), Cost sharing).

- **Total Estimated Costs:** Enter the total amount of funding requested from the Government.

10.8.4 Joint Proposals Involving Both U.S. Government and Non-Government Organizations or U.S. Organizations and Non-U.S. Organizations

- Unless specified in the NOFO, if a PI from any private or public organization proposes to team with a Co-I and/or use a facility at a U.S. Government organization (including NASA Centers and JPL), the proposal budget shall include all funding requested from NASA for the proposed work effort, including all costs of Government personnel or facilities to be paid by NASA. This shall be reflected in the budget totals that appear in the budget forms (e.g., proposal cover page, [Grants.gov](#) forms, and budget details). Also, the budget narrative and the budget details – other applicable costs shall include any required budget for such Government Co-I and/or facility. If selected, NASA will execute an inter- or intra-agency transfer of funds, as appropriate, to cover the applicable costs at that Government organization.

- If a PI from a U.S. Government organization (including NASA Centers and JPL) proposes to team with a Co-I from a non-Government organization, then the proposing Government organization shall issue a subaward for the costs of the Co-I. Such non-Government Co-I costs shall be entered as a “Subaward” in the budget and identify which Co-I organization is to receive the funding.
- If a PI from a non-U.S. organization proposes to team with a Co-I from a U.S. organization, the proposer shall submit a budget for the U.S. Co-I and identify which Co-I organization is to receive the funding.

10.8.5 Responsibility of the Proposing Organization to Issue Subawards for Co-Is at Other Organizations

Other than the special cases discussed above, or unless it is not legally permitted or it is specifically noted otherwise in the NOFO, the proposing PI organization shall issue subaward(s), through an approved funding mechanism, to fund all proposed Co-Is who reside at other non-Government organizations.

10.8.6 Full-Cost Accounting at NASA Centers

Regardless of whether functioning as a team member or the proposing organization, NASA Center personnel shall propose budgets based on full-cost accounting. Proposal budgets from NASA Centers shall include all costs to be paid out of the resulting award. Costs that will not be paid from the resulting award, but that will be paid from a separate NASA budget (e.g., Center Management and Operations, (CM&O)), and that are not based on the success of the specific award, shall not be included in the proposal budget. For example, CM&O shall not be included in the proposal budget, while direct civil service labor, travel, service pools, and other charges to the proposed work effort or research task shall be included. Proposal budgets (including JPL participation) shall include all costs except for the JPL award-fee award amount.

10.9 Facilities, Equipment, and Other Resources

1. Applicants are required to submit a technical narrative for facilities, equipment, and other resources (F&E) that describes any special F&E that are required for the applicant to complete the proposed project. This section of the proposal shall:
 - a. Describe any required existing F&E for the proposed work effort and whether the recipient already has access to items that are in good working order, or if such items need to be repaired, upgraded, or acquired (see letters of support for facilities and equipment not controlled by a member of the proposal team in section 10.7, Statement of Commitment and Letters of Support);

- b. Disclose the following per the [*NASA Pre-award and Post-award Disclosure Requirements*](#) table:
 - i. In-kind contributions with an estimated dollar value of \$5,000 or more that support the research activity for use on the project/proposal being proposed, and
 - ii. Postdoctoral scholars, students, or visiting scholars who are supported by an external entity, and whose research activities are intended for use on the project/proposal being proposed; and
 - iii. If considered F&E, current or pending participation in, or applications to, programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs.
 - c. Not include any text that belongs in the page-limited S/T/M Plan (e.g., description of the work plan, justifications for perceived impact of the work, descriptions of proposal team roles and responsibilities).
2. Proposals submitted via [Grants.gov](#) shall include F&E as a separate PDF document to be uploaded to the Grants.gov application and titled “Facilities, Equipment, and Other Resources.”

10.10 Table of Personnel and Work Effort

The Table of Personnel and Work Effort (Table) summarizes the proposed work effort, whether performed at the proposing or other organization and whether NASA funds the work. This section of the proposal shall not describe the work each member will be performing or include any other technical details that belong in the S/T/M Plan.

- Proposals shall not include the Table in the budget narrative section. Instead, the Table shall follow the Facilities, Equipment, and Other Resources section.
- The Table shall include the following:
 - A listing of the planned work commitment, by person’s name or role without any additional technical details of what work they will be doing;
 - Only those resources that are directly applicable to the proposed research or work effort (as opposed to technical details); The names and/or titles of all personnel necessary to perform the proposed effort, including the planned work funded by NASA, as well as the planned work not funded by NASA;
 - Position (i.e., postdoc or technician) if names are not known; and

- Planned work not funded by NASA that is listed in the Table is not considered cost-sharing as defined in 2 CFR § [200.306](#), Cost sharing.

10.11 Data Management Plan (DMP)

All proposals submitted shall include a DMP, at a minimum, per the [NASA Plan for Increasing Access to the Results of Scientific Research](#). Proposals for work that will not generate any data or qualify for an exemption, as defined in the NASA Plan, shall specifically demonstrate this in the DMP. Unless otherwise instructed in a NOFO, the DMP is part of the NSPIRES cover page or is submitted via the program-specific data form, available as part of the instructions document for a proposal submitted through [Grants.gov](#). Proposers responding to a NOFO shall refer to the NOFO for any NOFO-specific DMP requirements and information on the evaluation of the DMP.

10.12 Proposal Submission Checklist

Proposals submitted to NASA must conform to the proposal preparation and submission instructions in this chapter, or the NOFO, if instructions differ. Prior to submission, it is strongly recommended that proposers ensure they have complied with instructions and the format specified. The following items of note in the proposal preparation process:

- Read relevant NOFOs in their entirety. Contact points of contact in the NOFO to obtain clarification on pertinent questions.
- Address all objectives listed in the NOFO with an implementation plan that breaks down all activities the proposer will complete by the end of the POP.
- Identify pivotal milestones, demonstrate knowledge of key publications in the field, and how proposed activities will extend or build on those accomplishments.
- Choose non-color-dependent ways of conveying critical information, as reviewers may not be able to differentiate colors or hues.
- Propose fresh, new ideas that would advance the state of the research. Simply revising a previous proposal to meet deficiencies in previous reviews does not guarantee a higher rating or selection.
- Ensure budget costs are reasonable, allowable, and allocable to the proposed work in accordance with 2 CFR 200, [Subpart E](#), Cost Principles or, if a for-profit entity, FAR subpart 31. Prepare a thorough budget that provides all details and supporting documentation necessary to justify and facilitate an understanding of all proposed costs.
- Ensure familiarity with the proposal submission systems well before deadlines. If

possible, submit proposals well in advance of deadlines to minimize impacts of potential technical difficulties.

- Proofread the proposal carefully.

11.0 Submitting an Application

Proposals shall be submitted by the AOR at the PI's organization. The AOR's submission of the proposal serves as the required original signature by an authorized official of the proposing organization. There are three different ways that NASA may require a proposal be submitted by an entity. These are:

- A Notice of Intent (NOI) is required, and then a full proposal.
 - While the NOI may be submitted without an AOR's signature, the full proposal must be submitted by the AOR.
- A complete full application, also known as a One-Step Proposal.
- A Two-Step Proposal

All applications must be submitted electronically, as instructed in the NOFO or NASA's request for a single-source proposal. NASA will not accept other types of application submission, except when a waiver of this requirement is approved by the NASA point of contact listed in the NOFO, or single-source proposal request. The process for applying for a waiver is described in [Appendix B](#).

Although any individual may create a proposal and release it to their organization, only a person authorized to represent and obligate the proposing entity (the AOR) may submit a proposal. It is the proposed PI's responsibility to coordinate changes and updates to the proposal with the AOR. In instances where the same individual serves as both the PI and the AOR, that individual shall take separate actions for each role to ensure that the proposal is properly submitted.

Proposals are due prior to 11:59 pm (Eastern Time) on the proposal's due date.

11.1 Notice of Intent

In some cases, NASA requests or requires submission of a NOI to propose prior to the submission of a complete proposal. In the case of required NOIs, a proposer's failure to submit the NOI by the specified time may result in non-acceptance of the NOI and any subsequent proposal. If an NOI is required prior to the submission of the proposal, the NOFO will state that explicitly.

The material in a NOI is confidential and will be used for NASA planning purposes only. NOIs shall be submitted via [NSPIRES](#). Once logged in, proposers will access the “Proposals/NOIs” module and select “Create an NOI,” selecting the NOFO to which the NOI will be submitted. Unlike a full proposal, submission of an NOI typically does not require that files be uploaded or any action by the proposer’s AOR, and it may be submitted by the PI directly to NASA via NSPIRES.

Typically, NOIs allow proposers to submit the following information:

- Title of the anticipated proposal (not to exceed 254 characters). The title shall be readily understandable by a scientifically trained person;
- A brief description of the primary work or research area(s) and objective(s) of the anticipated work or research;
- The names of Co-Is and/or Collaborators known at the time the NOI is submitted. To enter these names, those team members shall have previously registered in NSPIRES (a PI cannot register on their behalf); and
- Answers to “Program Specific Data” questions that may be asked, such as a shortened version of the title.

After completing the indicated fields, proposers shall submit the NOI electronically.

11.2.1 One-Step Proposal

A One-Step Proposal is a proposal that requires only a full application by the due date of specified in the NOFO. Organizations may generally submit their proposal via [NSPIRES](#) or [Grants.gov](#); however, all team members and the submitting organization shall be registered in NSPIRES. If submitting a proposal via Grants.gov, the proposer shall ensure that all the required forms are included. The components of the proposal, including the page-limited Science/Technical/Management Plan (see section 10.3, Scientific/Technical/Management Plan), are outlined in [Table 1](#). All team members shall confirm their participation either via NSPIRES or, for Grants.gov submissions, by providing a letter of commitment. Proposals shall be submitted by the due date and time set forth in the NOFO. Failure to do so may result in NASA rejecting the proposal.

11.2.2 Two-Step Proposal

NASA NOFOs sometimes require or request submission of a preliminary proposal in advance of submission of a full proposal, in order to reduce administrative burden on applicants. Rather than requiring a complete and final proposal up front, NASA may require an abbreviated submission as a first step and then provide further instructions on how to submit a full and final proposal.

The NASA program NOFO will specify content and submission requirements when two-step proposals are to be used. If a NOFO requires a two-step submission process, the general steps below outline the process:

Step-1 Proposal:

1. PIs complete an abbreviated proposal and provide required content outlined in the NOFO.
2. The AOR submits by the required due date.

Step-2 Proposal:

1. NASA evaluates the submitted Step-1 proposal and communicates with the applicant either:
 - a. They are encouraged/invited to submit a Step-2 proposal.
 - b. They are not encouraged/invited to submit a Step-2 proposal.
2. NASA may also offer feedback after evaluating the Step-1 proposal.
3. PI prepares the final Step-2 proposal following the additional requirements guidance in NASA NOFOs and incorporating feedback, if permitted. NOFOs will outline what changes to the proposal are permitted between the Step-1 and Step-2 submissions.
4. The AOR submits the full Step-2 proposal by the required due date.

11.3 Renewal Proposals

Renewal proposals shall describe relevant achievements made during the previous award(s) in the proposal's S/T/M Plan. Also, for proposers using the [NSPIRES](#) electronic submission system, the proposal cover page provides space for entering the NASA Financial Assistance Identification Number (award number) of any existing award that is the predecessor to the renewal proposal being submitted. NASA does not extend any special consideration or preference for renewal proposals and all proposals received in response to a NOFO are treated as new proposals and are reviewed impartially. If a renewal proposal is selected, NASA will fund the proposal as a new award and the start date of a renewal award will follow the POP end date of the preceding award (i.e., a renewal award may not overlap the predecessor award). All renewal proposals require a different title from the previous award. A change as simple as adding "Phase 2" is sufficient.

11.4 Electronic Submission

11.4.1 Submitting Proposals Through NSPIRES

NASA strongly encourages the submission of proposals through [NSPIRES](#), and encourages potential proposers to access the site well in advance of the proposal due date(s) to familiarize themselves with its structure and enter the requested identifier information.

NSPIRES automatically assigns a unique proposal number after the proposal is successfully submitted. NASA uses this NSPIRES number throughout the proposal review and selection process to identify the proposal and its associated electronic data. If an NSPIRES number does not appear on the proposal cover page, this means the proposal was not correctly submitted.

All proposals submitted via NSPIRES shall include the required electronic proposal cover page and one or more uploaded PDF files, including elements listed in [Table 1](#). The cover page consists of:

- General information about the proposal, the submitting organization, team members that contain the identifier information for the proposing institution and personnel;
- Certifications and Authorizations;
- A proposal summary that provides an overview of the proposed project that is suitable for release through a publicly accessible archive if the proposal is selected;
- Other project information including international collaboration, environmental impact, and historic site impact;
- Program-specific data questions with answers that are unique to each NOFO; and
- The budget for the proposed work effort.

NSPIRES will promptly notify the AOR and PI via email upon successful proposal submission by the AOR. Proposers can also verify that their proposals were submitted by logging into NSPIRES and verifying that the proposal record appears in the “Submitted Proposals” (versus “Unsubmitted Proposals”) section of their accounts. Proposers that do not receive a verification email or experience issues verifying submission may contact the help desk prior to the application due date.

Assistance with NSPIRES is accessible through the [NSPIRES on-line help site](#). For any questions that are not available on the on-line help site, the NSPIRES Help Desk operates Monday through Friday from 8am to 6 pm (Eastern Time), except on federal government holidays. Requests for assistance may be directed by email to nspires-help@nasaprs.com or by

telephone to (202) 479-9376.

11.4.2 Submitting Proposals Through Grants.gov

Proposers may have the option to use [Grants.gov](https://www.grants.gov) to prepare and submit proposals. As a reminder, to submit applications on Grants.gov, the AOR shall complete a [one-time registration process](#). Proposers shall access Grants.gov well in advance of the proposal due date(s) to familiarize themselves with its structure and download the appropriate application packages and tools. Registration checklists are included on Grants.gov.

All proposals submitted through Grants.gov will be transferred to [NSPIRES](#) and transcribed for evaluation by NASA. All individuals and organizations named in the proposal shall register in NSPIRES to enable the transfer. If there are multiple proposals submitted via Grants.gov with the same title and PI, NASA will attempt to accept and review the version with the latest time and date stamp.

Instructions for the use of Grants.gov may be found on the [Grants.gov How to Apply for Grants](#) webpage. Instructions for NASA specific forms and NASA program-specific forms may be found in the “Instructions” that accompany the specific NOFO application package. For any questions and answers that are not available on-line, requests for assistance may be directed by email to support@grants.gov or by telephone to (800) 518-4726. The Contact Center is available 24 hours a day, seven days a week, except for federal holidays.

To submit a proposal via Grants.gov, the PI shall download the application package from Grants.gov. Identifying the appropriate application package requires using the “Search Grant Opportunities” function within Grants.gov and/or using the funding opportunity number for the specific program. The funding opportunity number is in the NOFO. For omnibus NOFOs, such as Research Opportunities in Space and Earth Science (ROSES) or Research Opportunities in Aeronautics (ROA), each program element will have a separate funding opportunity number.

Submitting a proposal via Grants.gov requires the following additional steps:

1. Proposers (including the PI, PI’s organization, AOR, and all named team members) shall register in NSPIRES even if they submit their proposal through Grants.gov (proposals are transcribed into NSPIRES for review). While the entity’s AOR must register in Grants.gov if applying through that system, grant researchers (PIs) do NOT need to register with Grants.gov;
2. To find open and current NASA NOFOs, use the [“Search Grants” page](#) on Grants.gov. Using the Basic Search function, enter the funding opportunity number to retrieve the application package;
3. Download and install any required Grants.gov software applications or tools;

4. Download the application package from Grants.gov;
5. Complete all required forms within the downloaded application package. For instructions on required program-specific forms, view the “Application Instructions” that accompany the application package;
6. Create a proposal in PDF, including the Science/Technical/Management plan and all other required sections. Attach the proposal and any allowed or required appendices/attachments (also in PDF) to the appropriate Grants.gov [form](#)(s); and
7. Submit the proposal via the AOR; the PI may not submit the proposal to Grants.gov unless they are the AOR.

It is the proposer’s responsibility to ensure the successful submission of its proposal and to ensure that all required parts of the proposal, as described in the NOFO, are incorporated. Sections of proposals transferred from Grants.gov to NSPIRES may appear in a slightly different order. Proposers should expect to receive notification from NSPIRES of a successful submission to that system. Contact the NSPIRES Help Desk if notification is not received within two to three business days before the proposal due date.

11.4.3 NASA Requirements for Uploaded PDF Files

PDF files that do not meet the following requirements may be rejected as noncompliant and not submitted to peer review for evaluation.

The file size limit for proposals submitted electronically to NASA through either [NSPIRES](#) or [Grants.gov](#) is 20 MB. Any embedded photos and graphic files shall be compressed and cropped to an appropriate size and resolution to facilitate the review of the proposal.

Also, any proposer that creates files using TeX or LaTeX is required first to create a DVI file and then convert the DVI file to Postscript and then to PDF. See the [NSPIRES User Guide](#) for more information on creating PDF documents compliant with NSPIRES.

It is the responsibility of each proposer to verify that:

- All PDF files are unlocked and that edit permission is enabled;
- All fonts are embedded in the PDF file; and
- The proposal is accurate and complete, including all text, figures, tables, and required forms.

To quality check work before submission, proposers should follow these steps:

1. Log into NSPIRES
2. Click “View Proposal”
3. Click “Generate” button
4. Click “Draft Proposal” PDF icon
5. Review draft submission for completeness and accuracy

Proposers shall submit their proposals by the due date even if a proposal does not properly generate. Proposals submitted via Grants.gov will be transcribed into NSPIRES, which may take several days after the proposal due date, and they will be checked for completeness and accuracy. The proposer shall immediately contact the NSPIRES Help Desk for assistance with any proposal that is not complete and correct.

11.5 Withdrawal of Proposal

The proposer may withdraw a proposal at any time for any reason, such as if another organization has agreed to fund the proposal. Proposals submitted using [NSPIRES](#) may be withdrawn electronically by the AOR, or the proposer may send a signed written request to withdraw a proposal to the NASA technical point of contact listed in the NOFO.

12.0 Proposal Review and Selection Criteria

All proposals will undergo an administrative, merit, and financial review, as described in the sections below. The NASA funding organization responsible for managing the technical aspects of an awarded effort is responsible for the merit review process, which may be based on peer review. Per 2 CFR § [200.205](#), Federal agency review of merit of proposals, all applications for NASA discretionary awards must be subject to a merit review with the objective of selecting the recipient most likely to be successful in delivering results based on the objectives outlined in that program’s Assistance Listing. A merit review is an objective process of evaluating applications in accordance with written standards. Evaluation criteria for all proposals are located in the NOFO and the merit review process will follow this criteria. All proposals submitted in response to a NOFO are evaluated by the same merit review process regardless of the submitting organization.

12.1 Proposal Rejection Without Review

NASA reserves the right to reject a proposal without review for the following reasons:

- The proposal is not submitted by the due date/time set forth in the NOFO;

- The proposal does not meet the requirements for proposal format, content, and organization as specified in this Guide and/or the NOFO. Proposers should note that reprints and/or preprints are not permitted to be appended to a proposal unless accommodated within the proposal page limit;
- The proposal consists of PDF files that do not meet NASA requirements or otherwise cannot be captured by [NSPIRES](#);
- The proposal contains unsolicited appendices/attachments;
- The proposal is submitted through [Grants.gov](#) without the [required NSPIRES registration](#);
- The proposal is nonresponsive to the objectives and/or provisions of the NOFO; and/or
- If it is determined that a senior/key person failed to disclose required biographical sketch or current and pending (other) support information. See sections 10.5, Biographical Sketches, and 10.6, Current and Pending (Other) Support Disclosures, for more information.

12.1.1 Overview of the Review and Selection Process

After the submission of a proposal, NASA will evaluate the applications submitted to determine which applications will be selected for funding. An overview of the process from proposal submission through selection is as follows:

1. The Program Officer, or their designee, selects reviewers based on their known expertise relevant to the content of each proposal and the avoidance of conflicts of interest.
 - a. While in-person and virtual panel reviewers generally have access to all proposals reviewed by the panel, access is restricted in the cases of identified conflicts of interest.
 - b. Non-panelist reviewers only have access to the proposals for which they are assigned.
2. The scientific and technical merits of each proposal are evaluated by the peer reviewers. Peer reviewers are asked to review and comment on the perceived programmatic relevancy, the cost reasonableness of the proposals, and if applicable, other evaluation criteria specified in the NOFO.
3. The Program Officer develops a recommendation for which proposals to fund based on the science/technical merit peer review, any program-specific criteria stated in the NOFO, relevance to the objectives stated in the NOFO and/or NASA strategic plans,

programmatic balance/comparison to competing proposals of equal merit, and available budget resources. Selections are then made by the NASA Selection Official.

4. After selection, each proposer is notified of the disposition of its proposal. However, a notice of selection does not constitute an award of funds. All proposers may request a debriefing from NASA regarding the evaluation of their proposal.
5. A Program Officer then forwards the notice of selection to the NSSC which may contact the proposing organization to negotiate funding through an appropriate award instrument.
6. If required, NASA may notify Members of Congress of award selections.
7. Following notification to proposers, a list of selected proposals is posted to [NSPIRES](#). NASA considers the proposal title, the PI's name and organization, and the proposal summary to be in the public domain and will post that information on an appropriate publicly accessible location. Selected proposers may release any additional information about their proposals, at their discretion. It is NASA's policy not to release any information about proposals that are not selected for funding.

12.2 Administrative Review

NASA's initial review of each proposal determines if it meets the minimum administrative requirements. These requirements usually include, but are not limited to, the following factors:

- Timeliness of submission
- Eligibility Requirements
- Formatting requirements

12.3 Merit Review

NASA conducts merit reviews on the technical and programmatic aspects of applications as outlined in this section. However, the NOFO, if applicable, may supplement and/or modify specific criteria. NASA always seeks the best possible evaluations by qualified, unconflicted peers of the proposer who are knowledgeable in the objective(s) addressed in the proposals. Characteristics of successful proposals are technical merit, logical structure, completeness, readability, compliance with any published funding limits, and responsiveness to the advertised funding organization's performance goals outlined in the NOFO. NASA will consider proposals that the reviewers identify as fully meeting the evaluation criteria for funding.

Following the peer review evaluation process, the cognizant Program Officer will evaluate the competitively rated proposals in the context of the programmatic objectives and financial limitations. The Program Officer will present a recommendation for selection based on the entirety of these factors to the NASA Selection Official. The Selection Official will select proposals as judged against the evaluation criteria, the objectives of the NOFO, if applicable, programmatic considerations, and available financial resources.

As a matter of policy and practice, proposals submitted to NASA are principally reviewed by panels composed of the proposer's professional peers who have been screened in advance for conflicts of interest. In addition, panel reviews may be augmented by one or more non-panelist reviews solicited by the NASA Program Officer or designee that are made available to the panel reviewers once they convene. As a rule, and based on its deliberations, a peer panel is authorized to wholly or partially accept or reject any such non-panelist reviews. There are generally at least three readers of each proposal. In all cases, copies of every proposal are available for inspection by the members of the panel while it is in session. The panel's final proposal evaluation is reviewed and approved for completeness and clarity by the attending NASA Program Officer and, if appropriate, by the chair of the panel.

The evaluation forms that are provided to reviewers will list (perhaps in abbreviated form) all criteria for which their opinion is requested. Reviewers are instructed to evaluate each proposal against the evaluation criteria stated in the NOFO and not to compare proposals to which they have access, even if those proposals propose similar objectives. Only the NASA Program Officer may make binding comparisons of proposals during the process of developing recommendation for selection.

12.3.1 Evaluation Criteria

The evaluation criteria considered in evaluating a proposal are its relevance to NASA's objectives, intrinsic merit, and cost. The failure of a proposal to be rated highly in any one of these factors may cause the proposal not to be selected.

Evaluation of a proposal's relevance includes the consideration of the potential contribution to NASA's mission, as expressed in its most recent NASA Strategic Plan and the permitted scope and specific objectives and goals given in the NOFO. If a NOFO describes the program's relevance to the NASA Strategic Plan, it is not necessary for proposals to show relevance to NASA's broader goals and objectives but rather only to demonstrate relevance to the specific goals and objectives set forth in the NOFO.

Evaluation of Intrinsic Merit includes the consideration of the following factors, as applicable to each proposal:

- The quality of the proposed project, including, but not limited to, the scientific rationale and the expected significance and/or impact of the proposed work;

- Overall technical quality of the proposed work, including, but not limited to, the quality of the management plan and project timeline for carrying out the work and the effectiveness and resilience of the proposed experimental designs, methods, techniques, and approaches for achieving the proposed goals and/or objectives;
- The qualifications, capabilities, and related expertise of personnel demonstrated by the proposal (e.g., publications, delivered products, and other measures of productivity and/or expertise) that will affect the likelihood of achieving the objectives; and
- Facilities, instruments, equipment, and other resources or support systems presented in the proposal that will affect the likelihood of achieving the proposed objectives.

Evaluation of the cost of a proposed effort includes an assessment of the allowability, allocability, and reasonableness of proposed costs. The evaluation of the proposed cost to available funds is performed by NASA personnel and is not part of the peer-review process.

The combined significance of a proposal's strengths and weaknesses determines its final summary evaluation. This may be given for each criterion or as a single overall evaluation. The evaluation is based on the following adjectival scale.

Table 2 – Adjectival Scale for Proposal Evaluations

Summary Evaluation	Basis for Summary Evaluation	Relationship of Summary Evaluation to Potential for Selection
Excellent	A thorough and compelling proposal of exceptional merit that fully responds to the objectives of the NOFO as documented by numerous or significant strengths and with no major weaknesses.	A top priority for selection in the absence of any issues of funding availability, suspension or debarment, past performance, or programmatic priorities.
Very Good	A competent proposal of high merit that fully responds to the objectives of the NOFO, with strengths that significantly outweigh any weaknesses, none of which are fatal flaws.	A second priority for selection in the absence of any issues of funding availability, suspension or debarment, past performance, or programmatic priorities.
Good	A competent proposal representing a credible response to the NOFO with strengths and weaknesses that are well-balanced.	May be selected as funds permit based on programmatic priorities, and absent any issues such as suspension or debarment or past performance.
Fair	A proposal that provides a nominal response to the NOFO but with weaknesses outweighing any strengths.	Not selectable regardless of the availability of funds or programmatic priorities.
Poor	A seriously flawed proposal, having one or more major weaknesses that constitute fatal flaws.	Not selectable regardless of the availability of funds or programmatic priorities.

To help ensure uniformity of the reviews, NASA requires its reviewers to document their findings using clear, concise language that is understandable to the non-specialist by means of perceived strengths and weaknesses, which may each be designated as a “major” or “minor” finding.

A strength is a finding that increases a proposal’s suitability for funding by a given criterion. A major strength significantly increases a proposal’s suitability, and a minor strength increases, but not significantly, a proposal’s suitability. A reviewer may conclude that multiple minor strengths together are equivalent to a major strength.

A weakness is a finding that decreases a proposal’s suitability for funding by a given criterion. A major weakness significantly decreases a proposal’s suitability, and a minor weakness decreases, but not significantly, a proposal’s suitability. For a weakness to be minor, it shall not significantly affect an appreciable portion of the proposed work or the final outcome. A reviewer

may conclude that multiple minor weaknesses together are equivalent to a major weakness. A fatal flaw is any single weakness or collection of weaknesses that would effectively prevent, in part or in whole, the proposed objectives from being accomplished or that otherwise may render the proposal unsuitable for consideration for funding (e.g., the proposal fails to address the NOFO's objectives, will have no impact, has a plan of research that is incapable of succeeding, proposes an unrealistic level of effort).

If proposals are rated equally, the Program Officer and Selection Official may use other factors to determine final selections. These factors include, but are not limited to, the balance of the research objectives addressed by other tasks within the program and available program funds.

Occasionally a proposal may include tasks or activities that rate low on one or more evaluation criteria or have other aspect(s) that is(are) considered undesirable or unnecessary (e.g., tasks not permitted by a NOFO, plans for excessive travel, the support of certain personnel). In such a case, and at the option of the cognizant NASA Program Officer or designee, a proposal may be evaluated more than once: first as originally proposed, and then again as "descoped" of one or more of its original provisions. In such a case, the rating of the descoped proposal may justify its consideration for funding consistent with the policy for partial selections (see below), and NASA may request a revised proposal.

Although a peer review may rate a proposal as having high Intrinsic Merit, it still may not be selected due to other factors such as budget limitations, lack of relevance to the NOFO, or for programmatic balance.

12.3.2 Peer Review Conflicts of Interest and Confidentiality

The issue of conflicts of interest and confidentiality is of critical importance to the peer-review process. All reviewers are directed to avoid not only actual but also any apparent conflicts of interest and to maintain confidentiality about all activities involved in the review process. Reviewers are personally responsible for identifying and calling to the attention of the cognizant NASA Program Officer or designee any COI situations. The presiding NASA Program Officer addresses and adjudicates conflicts of interest based on the following general guidelines:

- Every reviewer agrees to avoid conflicts of interest (both actual and apparent) and to maintain the confidentiality of their participation in and the results of the review process. Non-federal reviewers are required to sign a Nondisclosure Agreement in advance of being given access to any proposals. U.S. Government employees are governed by the Ethics in Government Act. If an unanticipated conflict arises or otherwise becomes known during proposal reviews, the reviewer shall immediately inform the cognizant NASA Program Officer and cease participation pending a NASA decision on the issue.
- Disclosure by a reviewer of the proposals, their evaluation materials, and discussions is never condoned by NASA under any circumstances at any time, including after the selections are announced. Since the review process is not complete until selections are

announced, a breach of confidentiality of the review process may result in the entire selection process for that specific funding opportunity being declared invalid.

- NASA may ask individuals to participate as reviewers even if such individuals are identified in a competing proposal. In such situations, NASA will take mitigation measures to minimize impacts to the competition.

Proposal titles, project summaries, and project team personnel and participants may be disclosed to potential reviewers who ultimately decline to act as reviewers because the presence of conflicts or a lack of expertise pertaining to specific proposal topics.

12.3.3 Examples of Peer Reviewer Conflicts

Below is a non-exhaustive list of examples of disqualifying affiliations and relationships. NASA funding organizations may provide additional guidance on conflicts of interest requirements for specific programs.

Peer reviewers may have a disqualifying COI or appearance of a COI if they have a relationship or affiliation identified in any of the three categories listed below in sections 12.3.3.1 through 12.3.3.3.

12.3.3.1 Peer Reviewer Affiliations with a Proposing Organization

- Current employment at the proposing organization as a professor, adjunct professor, visiting professor, employee, or similar position.
- Other current employment with the proposing organization (such as a consulting or advisory arrangement).
- Seeking or negotiating for employment with the proposing organization.
- Formal or informal arrangement for future employment with the proposing organization.
- A financial interest in the proposing organization (e.g., ownership of securities).
- Serving as an officer, director, trustee, general partner, or in another role of authority in the proposing organization. (Ordinary membership in a professional society or association is not considered an office.)
- Current enrollment as a student with a proposing organization. (This is only a conflict for proposals or applications that originate from the department or school where one is a student.)

- Previous employment with the proposing organization within the last 12 months.
- Any award, honoraria, or other payment received from a proposing organization within the last 12 months.

12.3.3.2 Peer Reviewer Relationship with an Investigator, Project Director, or Other Person Who Contributed to the Proposal

- Family relationship; e.g., a spouse, child, sibling, or parent.
- Business or professional general partnership. (An ordinary scientific collaboration is not considered a partnership).
- Association as thesis advisor (major professor) or thesis student or acting in a similar role within the past 12 months.
- Professional or personal relationship that may prevent a reviewer from being impartial or viewed as impartial.

12.3.3.3 Other Affiliations or Relationships

The following interests may create a conflict or the appearance of a conflict for a peer reviewer:

- Any financial interest or professional affiliation or relationship of the reviewer's spouse, minor child, anyone living in the immediate household, or anyone who is legally a general partner (e.g., if a proposing organization employs a spouse, this may create an actual conflict or the appearance of a conflict for a reviewer.).
- Other relationships, such as close personal friendships that may tend to affect judgment or be seen as doing so by a reasonable person having knowledge of the facts.
- Other financial interests and relationships, such as those related to persons or organizations in competition with a proposing organization, which one thinks may tend to affect judgment or be seen as doing so by a reasonable person having knowledge of the facts.

If a peer reviewer identifies a potential or actual COI or appearance of such a conflict at the beginning or at any time during their tenure as a NASA peer reviewer, they should immediately stop the review of the proposal and contact the NASA Program Officer or designee who asked them to serve as a peer reviewer. This official will determine whether the reviewer may continue to serve as a reviewer and may recommend a consultation with their institution's legal counsel or ethics official. If at any time during the review process, reviewers need legal advice, then they

should consult their institution's legal counsel or ethics official. When local legal or ethics advice impacts the ability to review proposal(s), promptly inform the NASA Program Officer who coordinated the peer review, so that the proposal(s) can be reassigned.

13.0 Award Selection

The announcements of award selections range between 150 days and 220 days after the proposal due date, for proposals submitted in response to a NOFO. NASA usually does not announce new selections until after the approval of NASA funding through the federal budget process. Delays in this process may delay new selections and their announcements. Delays may also result from the need for additional materials from the proposer (e.g., revised budgets and/or budget details) in order to finalize the award.

After completion of the selection process, each proposer will receive notification via email regarding the disposition of its proposal.

Although optional, it is the practice of certain NASA funding organizations to notify proposers that they will be receiving a grant or cooperative agreement, via a Notice of Intent to Make a Federal Award, prior to providing the official Notice of Federal award signed by a GO. This Notice of Intent to Make a Federal Award is not an authorization to begin performance or a binding commitment by NASA or the United States government. Only the GO has the authority to obligate federal funds and to make awards.

Until the issuance of the award, there is no guarantee that financial assistance resources will be available. If an entity receives a NASA award, the entity will receive NASA Form [\(NF\) 1687](#), *NASA Grant and Cooperative Agreement*, a copy of the award's terms and conditions, and a list of applicable reports that the entity will need to submit once it starts implementing the award. The NF 1687 outlines important information such as the award number, the award's total value and POP, and identifies the NASA GO for the award. Only the NF 1687 authorizes a recipient to begin implementing the project and draw down funds.

Awards are made directly to the proposing organization and not to the PI. Thus, any change in PI affiliation between proposal submission and NASA's announcement of award decisions shall be brought to the attention of the NASA official in charge of the NOFO in writing and as soon as possible, preferably within five business days.

If subrecipients are stated in a proposal that has been selected for award through a competitive announcement, a separate award may be made to the proposed subrecipients when NASA deems it appropriate. Such grants are considered to be competed. The competitive announcement cover page, prime proposal, and its corresponding technical evaluation may be used to satisfy file documentation requirements for the subrecipient grant.

13.1 Partial Selection

NASA may elect to fund only a portion of a proposal. Partial selections also may offer tentative selections where NASA invites investigators to a joint investigation. In such a case, the proposer will have the opportunity to accept or decline such selection. If the proposer accepts such an offer, a revised budget and statement of work may be required from the proposer, if this reduction will be greater than 20 percent of the originally proposed budget. However, as a rule, if the reduction is less than 20 percent of the originally proposed budget, the adjustment to the budget and statement of work can be extracted from the original proposal, and no further submission will be required.

If NASA partially selects a proposal, the proposer may have the opportunity to modify the original proposal summary so that it correctly describes the funded research.

If the proposer declines the offer of a partial selection or participation in a joint investigation, NASA may withdraw its selection in its entirety.

13.2 Budget, Cost Analysis, and Financial Capability Reviews

Following the review and selection process, documents are submitted to the NASA GO for a review to determine if proposed costs are allowable, allocable, and reasonable for the proposed work. The GO will review the risk posed by applicants as required in 2 CFR § [200.206](#), Federal agency review of risk posed by applicants. NASA also is required, per [41 U.S.C. § 2313](#), to review the responsibility and qualification records in the non-public segment of [SAM.gov](#) if the grant award amount is expected to be above the Simplified Acquisition Threshold. To complete these required reviews, NASA may request proposers submit additional documentation.

14.0 Debriefings and Appealing NASA's Decision to Decline a Proposal

A proposer has the right to be informed of the major factor(s) that led to the acceptance or rejection its proposal. Debriefings may be available upon request. Again, it is emphasized that non-selected proposals should be aware that proposals of nominally high intrinsic and programmatic merits may be declined for reasons entirely unrelated to any scientific or technical weaknesses. Applicants wishing to appeal NASA's decision to decline a proposal shall adhere to the following policy.

14.1 Appeals Policy

1. This section describes the types of reconsideration that NASA may make available for grant and cooperative agreement proposals that entities have submitted to NASA. This section does not apply to proposals returned without review by NASA for an applicant's failure to:

- a. Submit a late proposal where information regarding the proposal deadline (i.e., date, time, and location) for submission had been previously specified.
 - b. Meet the NASA proposal preparation requirements, such as page limitations, formatting, instructions, and electronic submission.
 - c. Submit a proposal that is responsive to the NOFO or that contains sufficient detail.
 - d. Submit the proposal with enough lead time before the activity is to commence.
2. When a proposal for a NASA Federal assistance award is declined or returned by the Agency without review, for reasons other than those enumerated above, NASA provides the applicant the opportunity to dispute the Agency decision and present information and documentation to request reconsideration of this decision. For a declined or returned proposal to be reconsidered for funding, the applicant shall, within 30 calendar days of receiving the panel summary or individual reviewer(s) summary, submit a written Request for Reconsideration to the Selecting Official. If the applicant did not receive a panel summary or individual reviewer(s) summary, the Request for Reconsideration shall be submitted within 60 calendar days of receiving the notification that the proposal has been declined or returned. The Selecting Official, or designee, will respond to the Request for Reconsideration within 30 calendar days of receiving it. If additional time is required to prepare a response, the Selecting Official will provide an explanation of the need for more time to the applicant by the deadline for a response. Requests for Reconsideration submitted outside of this process may not receive the proper adjudication.
 3. The goal of the reconsideration process is to ensure that NASA's review of the proposal has been fair and reasonable, both substantively and procedurally. The scientific and technical merits may be examined within the context of budget availability and program priorities. Reconsideration may also address any procedural errors in peer review or other aspects of proposal review, including unidentified conflicts of interest.
 4. Most NASA awards are discretionary, and reconsideration is not an adversarial process. Therefore, a formal hearing will not be held as part of the reconsideration process. Because factors such as program budget and priorities factor into the decision to select or not select each proposal, NASA cannot ensure proposers that reconsideration will result in an award even if an error is discovered to have occurred in the review or selection process.
 5. After declining or returning a proposal, NASA will not consider any revisions that the applicant has made to its original proposal. However, this does not preclude an applicant from sending a substantially revised proposal to the Agency in response to a subsequent and different (new) NOFO. NASA reserves the right to return without review a proposal

that is substantially the same as one that was previously reviewed and declined or returned, regardless of whether a request for reconsideration was made.

14.2 Appeals Above the Selecting Official

If the applicant is dissatisfied with the explanation provided by the NASA Selecting Official, they may request in writing an appeal of the Selecting Official's decision. This appeal shall be submitted to the Assistant or Associate Administrator of the Mission Directorate or Office issuing the NOFO or one of their authorized designees. This appeal request shall explain why the applicant believes that the decision to decline or return the proposal was unwarranted. Appeal requests will be considered only if two conditions are met:

1. The applicant has first sought and obtained an explanation from the NASA Selecting Official, and
2. The appeal request is received by NASA within 60 days after the applicant received notice of the declination or return. Appeals of the Selecting Official's reconsideration decision shall be made within 30 calendar days of the applicant receiving that decision. NASA will provide a response to the applicant regarding the appeal within 30 calendar days of receipt.

14.3 Resubmission of a Non-selected Proposal

Non-selected proposals may not be submitted as an unsolicited proposal. However, the non-selection of a proposal does not restrict the submission of a similar (or even the same effort) by the proposer(s) in response to appropriate future NASA NOFOs or to other appropriate funding agencies or organizations. If a proposal submission to NASA is contemplated, proposers are strongly urged to carefully consider the entirety of comments offered during their debriefing or in any evaluation documents that NASA provides, as well as the proposal guidelines, before making the decision to resubmit the same, or substantially the same, proposal. Merely correcting any perceived deficiencies in a proposal, as noted by a review process for one NOFO, in no way guarantees a higher rating or selection in response to a different NOFO.

15.0 Overview of Competitive and Non-competitive Grants and Cooperative Agreements

Consistent with the FGCAA, competition is not required but encouraged in the award process for grants and cooperative agreements. Grants and cooperative agreements are classified into two major categories: discretionary and non-discretionary. Discretionary awards are those which NASA, in keeping with specific statutory authority that enables the Agency to exercise judgement, selects the recipient and/or amount of Federal funding through a competitive process or based on the merit of proposals. Generally, such awards are made using merit-based peer or

scientific reviews following the procedures in 2 CFR § [200.205](#), Federal agency review of merit of proposals. Non-discretionary awards are those made by NASA to specific recipients in accordance with statutory eligibility and compliance requirements, such that in keeping with specific statutory authority the Agency has no ability to exercise judgement.

NASA awards grants or cooperative agreements on either: 1) a competitive basis, 2) a single-source basis, or 3) based on an unsolicited proposal. Although competitive awards are strongly encouraged when practicable, NASA has the authority to make awards on a non-competitive basis from single-source proposals and unsolicited proposals. The difference between single-source proposals and unsolicited proposals is that the Agency solicits proposals in single-source awards from only one recipient but does not solicit proposals when an award is based on an unsolicited proposal.

15.1 Competitive Awards

NASA strongly encourages the use of competition to fund projects with NASA federal financial assistance. These financial assistance funding opportunities are advertised via [NSPIRES](#) and [Grants.gov](#) and criteria to apply are outlined in the NOFO. Per 2 CFR § [200.204](#), Notices of funding opportunities, NOFOs should generally be made available for application for a minimum of 60 calendar days. Additionally, all announcements of grant and cooperative agreement funding opportunities must provide a synopsis using the standard set of data elements described in 2 CFR § 200.204. A synopsis/summary of information will be posted to Grants.gov within three business days of the funding opportunity being posted to NSPIRES.

15.2 Non-competitive Awards

15.2.1 Single-source Proposals

1. Single-source proposals for grants and cooperative agreements are applications for financial assistance for the support of an idea, method, or approach to carry out a project for a public purpose that is relevant to NASA. Single-source proposals are submitted in response to NASA's request for proposal made only to the proposing organization. Applicants for single-source awards must include sufficient technical and cost detail to persuade NASA that the project represents a worthwhile approach to satisfy the criteria below:
 - a. The proposing organization has unique qualifications or
 - b. The circumstances surrounding the proposed project necessitate the use of a non-competitive grant or cooperative agreement award.
2. All single-source proposals are thoroughly reviewed by NASA before award. Proposals exceeding the simplified acquisition threshold (as defined in 2 CFR § [200.1](#), Definitions)

will be evaluated by at least three peer reviewers. Due regard for conflicts of interest and protection of proposal information is always part of the peer review process.

15.2.2 Unsolicited Proposals

On very rare occasions, NASA may choose to fund an unsolicited proposal, which is a proposal that is submitted not in response to a NOFO but rather to support an idea, method, or approach to carry out a project that is not being solicited under a competitive funding opportunity. An unsolicited proposal may be funded when the project is particularly unique and innovative, special resources are available for the work, and the proposed project is especially meritorious. Unsolicited proposers must not have submitted a proposal for a similar project to a current or pending NASA NOFO. An unsolicited proposal must be of high scientific and technical merit and must be particularly relevant to NASA with proposed costs that are reasonable and realistic. Unsolicited proposals may be submitted in response to the unsolicited proposal response structure in [NSPIRES](#).

15.3 Renewal Awards

1. Award renewals provide for continuation of research or other activity beyond the original scope, POP, and funding levels. Therefore, new proposals, certifications, and technical evaluations are required prior to the execution of an award renewal. Competitive and non-competitive award renewals will be awarded as new grants or cooperative agreements. Continued performance within a period specified under the Multiple Year Award terms and conditions does not constitute a renewal.
 - a. Renewals support the same work, or work that is a natural extension of and closely related to current work, not new projects unrelated to the predecessor award.
 - b. Renewals are new awards. They differ from extensions of current awards, as described in this Manual at section 32.0, Administrative Changes and Supplements. Continuation within the original POP specified under a Multiple Year Grant or Cooperative Agreement does not constitute a renewal.
 - c. Renewals generally are longer duration awards, as opposed to shorter term lengthening of existing work, which can be achieved through extensions described in this Manual at section 32.0.
 - d. The start date of the renewal award should be instituted concurrent with the expiration date of the previous award so that the support is continuous and there is no break in funding. As new proposals, certifications and technical evaluations are required prior to the execution of a renewal.
2. Competitive renewal awards are those issued based on proposals submitted in response to

a NOFO. Recipients of existing awards are permitted to submit “renewal proposals” to continue an ongoing research or work effort to its next logical step in response to NOFOs that include the same NASA program objectives. However, to ensure equitable treatment of all submitted proposals, NASA does not extend any special consideration or preference to such renewal proposals. Therefore, NASA will consider all proposals received in response to a NOFO as new proposals and will review them impartially.

3. Non-competitive renewals will be justified as single-source proposals as described in section 15.2.1, Single-source Proposals, with the following conditions:
 - a. For awards that are derived from previous competitions, the requirements for justification are:
 - i. A determination that the work is still meritorious.
 - ii. A determination that the work is still relevant.
 - iii. A determination that the costs are reasonable and realistic.
 - iv. An explanation of why the work should be renewed rather than recompleted, e.g., relating to long-term continuity.
 - v. This type of justification may only be used once to renew grants that have been previously competed.
 - b. Renewals of efforts that have been previously competed may resemble the substance of a current or pending NASA NOFO. Renewals of efforts that have not been previously competed cannot resemble the substance of a current or pending NASA NOFO, as the renewal should instead be submitted as a response to the open NOFO.
 - c. Renewals of previously non-competitive awards must satisfy the requirements in sections 15.2.1, Single-source proposals.
 - d. For research originally awarded through a competitive NOFO that has completed its POP, peer review of a proposal to continue the research should be accomplished prior to selecting the research award for renewal. If the effort was originally awarded through an unsolicited proposal or single-source proposal, a new justification to accept the unsolicited or single-source proposal is required. Multiple year award term and conditions may be incorporated into renewals. In addition, these justifications must address: (1) why the renewal is necessary, and (2) why the work was not solicited in a NOFO.

16.0 Statements of General Policy

16.1 Contact with NASA Personnel

While NASA program personnel may be contacted to discuss general program objectives with prospective proposers, to the extent authorized by the NOFO, they are forbidden from providing specific advice on budgetary or technical issues beyond those published in the NOFO that may provide an unfair competitive advantage to any proposer unless this same information is made available to all interested proposers.

16.2 Environmental Policy

All awards shall comply with the National Environmental Policy Act (NEPA) of 1969, as amended ([42 U.S.C. § 4321](#), et seq.). Under NEPA, NASA is required to consider the potential environmental effects of proposed projects, including projects implemented by grant and cooperative agreement recipients. Most grant-related activities categorically exclude research and development projects that do not pose any adverse environmental impact, which the NASA Grants Record of Environmental Consideration (REC) covers. The questions in the following table enable NASA to identify proposals that do not fall within this blanket REC, and this questionnaire is available to proposers in [NSPIRES](#). Proposals that could result in a potential adverse environmental effect may require additional NEPA analysis if awarded (e.g., preparation of an Environmental Assessment). If an applicant selects “Yes” in response to any question below, then the relevant TO will notify the NASA NEPA office. “Yes” responses are not proposal review or selection criteria.

Table 3 – NEPA Assessment Questions

		Yes	No
1	Will the proposal involve any activity that includes: <ul style="list-style-type: none"> ○ Construction of new facilities or modification to the footprint of an existing facility; or ○ Ground disturbance (e.g., excavation, clearing of trees, installation of equipment, etc.); or ○ Outdoor discharges of water (e.g., wastewater runoff), air emissions (e.g., ozone-depleting substances), or generation of noise exceeding 115 dBA (excluding those associated with aircraft operations)? 		
2	Will the proposal involve any field activity that will: <ul style="list-style-type: none"> ○ Release equipment (e.g., dropsondes, sensors) or chemicals (e.g., dyes, tracers) into the air, bodies of water or on the ground; or ○ Release a parachute or use equipment that will not be recovered; or ○ Involve equipment or a payload that contains hazardous (e.g., petroleum, hypergolic, oxidizers, solid propellants) or radioactive materials? 		
3	Will the proposal involve the launch of a payload, equipment, or instrument (e.g., via launch vehicle, sounding rocket, balloon)?		
4	Will the proposal involve any activity to be conducted outside the United States or its territories?		

If a proposer anticipates an environmental impact associated with its proposal, it shall plan and budget accordingly. Proposers shall also document the environmental impacts in the program-specific data element of the proposal cover page submitted to NASA. For questions concerning environmental compliance requirements, please address the NASA NEPA Manager. More information is located on NASA’s [NEPA Program website](#).

16.3 Flight Activities

Proposals that include flight activities (not regular passenger travel) such as aircraft or helicopter flight services, including Unmanned Aircraft Systems (UAS)/Drones operations or the acquisition or construction of such flight vehicles, will be subject to monitoring and oversight per the most recent version of [NASA Policy Directive 7900.4E](#) and [NASA Procedural Requirement 7900.3D](#). The primary contact for questions concerning flight compliance requirements is Jamal Abbed, Program Executive for Aviation Oversight, at jamal.s.abbed@nasa.gov. Backup points-of-contact for questions concerning flight compliance requirements are Norman Schweizer, Aviation Operations Manager at norman.s.schweizer@nasa.gov and Grant Watson, Division Director of Institutional Safety Management, at grant.m.watson@nasa.gov.

16.4 Freedom of Information Act (FOIA)

NASA grants and cooperative agreements are subject to FOIA requirements set forth in [5 U.S.C. § 552](#), 2 CFR § [200.315](#), 2 CFR § [200.338](#) and [14 CFR 1206](#). Grant applicant and recipient records, including subrecipient records provided to NASA, will be subject to FOIA and applicable exemptions. Information from applications that are not ultimately funded are considered exempt under one of the FOIA exemptions and would not be subject to disclosures under FOIA. NASA may contact the grant recipient should their materials be subject to a FOIA request in order to ascertain whether parts of the requested materials fall under an exemption. In these cases, the grantee must reply to such requests in a timely fashion, no later than ten days after the FOIA unit's request is made.

16.5 Restriction on the Use of Classified Material

It is NASA policy that proposals are not to contain security-classified material. However, if the project's proposed approach requires access to classified information, or if the project will result in the generation of such material, the proposer shall comply with all Government security laws, regulations, and policies.

16.6 Limited Release of Proposers' Confidential Business Information

For proposal evaluation and other administrative processing, NASA may find it necessary to release information submitted by the proposer to individuals not employed by NASA. Business information that is entitled to confidential treatment may be included in the information released to these individuals subject to protective measures including non-disclosure forms and firewalls as appropriate. Accordingly, by submission of this proposal the proposer hereby consents to such limited release of its confidential business information (CBI).

16.7 Export Control

Information regarding U.S. export regulations is available at the U.S. Department of State's [Directorate of Defense Control website](#) and the U.S. Department of Commerce's [Bureau of Industry and Security website](#).

The following important provision may apply to proposals that involve the participation of non-U.S. organizations, as well as proposals that include personnel who are not U.S. citizens and do not have status as legal permanent U.S. residents.

16.8 Export-Control Guidelines Applicable to Foreign Proposals and Proposals Including Foreign Participation

Foreign proposals and proposals including foreign participation shall include a section discussing compliance with U.S. export laws and regulations, e.g., [22 CFR parts 120-130](#) and [15 CFR parts 730-774](#), as applicable to the circumstances surrounding the proposed foreign participation. The discussion shall describe in detail the proposed foreign involvement and is to include, but not be limited to, whether or not the foreign participation may require the prospective proposer to obtain the prior approval of the Department of State or the Department of Commerce via a technical assistance agreement or an export license, or whether a license exemption/exception may apply. If prior approvals are necessary via licenses, discuss whether the license is applied for, and if not, discuss the projected timing of the application and any implications for the schedule. Information regarding U.S. export regulations is available at the [U.S. Department of State website](#) and through the [U.S. Department of Commerce’s Bureau of Industry and Security website](#). Under U.S. law and regulations, spacecraft and the specifically designed, modified, or configured systems, components, and parts are generally considered “Defense Articles” on the United States Munitions List and subject to the provisions of ITAR, 22 CFR parts 120-130.

Because of these legal provisions and requirements, proposers and institutions whose proposals involve non-U.S. participants or personnel should be aware that such participation can add to management complexity and risk, and, therefore, proposers are encouraged to limit such cooperative arrangements to those offering significant benefits while maintaining the most transparent and simplest possible technical and management interfaces.

16.9 Export-Controlled Material in Proposals

Explicit inclusion of export-controlled material in proposals is not prohibited. However, under U.S. law and regulations, spacecraft and their specifically designed, modified, or configured systems, components, and parts may be considered “Defense Articles” on the United States Munitions List and subject to the provisions of ITAR, [22 CFR parts 120-130](#). Other items or information may be subject to the Export Administration Regulations (EAR), [15 CFR parts 730 – 774](#). This may, in some circumstances, complicate NASA’s ability to evaluate the proposal, since occasionally NASA may use the services of foreign nationals who are neither U.S. citizens nor lawful permanent residents of the U.S. to review proposals submitted in response to the NOFO.

Proposers are strongly encouraged not to include export-controlled material in their proposals, although the effort proposed may itself be export controlled. If it is essential to include any export-controlled information in a proposal, a notice to that effect shall be prominently displayed on the first pages of the proposal and shall state:

“The information (data) contained in [insert page numbers or other identification] this proposal is (are) subject to U.S. export control laws and regulations. It is furnished to the

Government with the understanding that it will not be exported without the prior approval of the Proposer under the terms of an applicable export license or technical assistance agreement.”

Reference the NASA [Export Control and Interagency Liaison Division \(ECILD\) website](#) for information on NASA’s Export Control Program and NASA Center Points of Contact.

For proposals submitted via [NSPIRES](#) or [Grants.gov](#), the first pages listing export-controlled information should precede the table of contents, do not count against the page limits, and may also be used to provide the proprietary notification, if applicable. It is the proposer’s responsibility to determine whether any proposal information is subject to export-control regulations. Many NOFOs will also include program-specific data questions about the inclusion of export-controlled material in the proposal; proposers shall answer these questions.

16.10 Proposals Involving Improvements to Private Property

While NASA has general authority to award grants and cooperative agreements under the National Aeronautics and Space Act, [51 U.S.C. § 20113\(c\)\(5\)](#), specific statutory authority is required to fund improvement of private property, including construction, maintenance, and disposition of real property of any kind.

Special considerations for infrastructure projects in accordance with the [IIJA](#) (Pub. L. 117-58, §§ 70901-52). If a Congressional appropriation authorizes funding for infrastructure projects and/or NASA Office of the General Counsel (OGC) and OP approval has been obtained for an infrastructure project, and the award meets the definition of infrastructure as set forth in NASA’s Special [Terms and Conditions](#), section 4, Buy America Preference for Infrastructure Projects, then the GO must include the “Buy America Preference for Infrastructure Projects” term and condition into the award. Pursuant to section 70914(c) of the IIJA, NASA may waive the application of a Buy America preference for an infrastructure program. In the event that an approval is granted to issue an infrastructure-related grant or cooperative agreement, and the recipient requests to waive the Buy America Preference provision, NASA will review and consider waiver requests on a case-by-case basis consistent with the process outlined in OMB Memorandum [M-22-11](#). See NASA’s Made in America [website](#) for more information.

16.11 Public Access to Scientific Research

All NASA-funded grant and cooperative agreements recipients are required to ensure that copies of publication and associated supplementary information are made available in NASA’s designated public access repository, [PubSpace](#). This excludes patents, publications that contain material governed by personal privacy, export control, proprietary restrictions, or national security law or regulations. See section 29.5, Submitting Manuscripts in PubSpace, and [Appendix C](#), Post-award Reporting and Certification Requirements, for information on publication accessibility deadlines.

The [NASA Plan for Increasing Access to the Results of Scientific Research](#) ensures the public has access to peer-reviewed and published results of NASA-funded research through [Pubspace](#). Researchers are required to post peer-reviewed (manuscripts reviewed by independent, qualified scientists and revised by the author per journal editorial process) or as-accepted manuscript version of publications in scientific journals arising from NASA-funded research, including authorship and co-authorship by NASA civil servants or other researchers who perform research and publish results that are funded by NASA directly or indirectly.

The NASA [STI Compliance and Distribution Services](#) provides instructions on submitting applicable grant and cooperative agreement documents, typically the final performance report (e.g., Research Performance Progress Report) and final peer-reviewed manuscripts (accepted for publication) containing STI, on its [Public Access](#) webpage.

16.12 Security

Proposals shall not contain national security classified material. If the proposed effort requires access to or may generate national security classified information, the submitter, if it receives an award, will be required to comply with applicable Government security regulations.

16.13 Special Notifications and/or Certifications

NOFOs may require proposals to include special notifications or certifications regarding the impact of research concerning the environment, human, or animal care provisions; conflicts of interest; or other topics as may be required by statute, Executive Order, or Government policies. Compliance with such requirements is necessary to ensure the submission of a complete and responsive proposal.

16.13.1 Lobbying Disclosures

Per 31 U.S. Code 1352, federally appropriated funds may not be used to lobby the U.S. government. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a Federal grant or cooperative agreement, the entity shall complete and submit [Standard Form-LLL](#), “Disclosure of Lobbying Activities,” in accordance with its instructions. If selected, prior to award, these disclosures must be submitted to the Grants Officer. For post-award reporting requirements, see [Appendix C](#).

16.13.2 NASA Form (NF) 1206

NASA Federal financial assistance recipients are required to provide assurances that they are complying with all Federal civil rights laws prior to award. A signed [NF 1206](#) is required of all NASA grantees, and it must be submitted to NASA every three years. Entities receiving NASA federal financial assistance must submit a NF 1206 after selection and prior to award if requested by a Grant Officer. For post-award reporting requirements, see [Appendix C](#). Note that as of January 2025 the NF 1206 is currently undergoing an update, and NASA will not request the NF 1206 from applicants or recipients until those updates have been completed.

16.14 Preventing Grant Fraud

Federal grant funds may be susceptible to fraud, waste, and abuse, and it is the responsibility of award recipients to serve as responsible stewards of Federal funds and ensure that funds are used for their intended purpose. Grant fraud can occur in many ways, and some of the most common fraud scenarios include charging personal expenses as business expenses against a grant, charging costs to a grant that are not attributable to that grant, billing more than one grant for the same work, and falsifying information in grant applications or reports.

To detect and prevent fraud, recipients should establish adequate internal controls as required by 2 CFR § [200.303](#), Internal controls, and report crime, fraud, waste, and mismanagement in NASA's programs to the NASA [Office of Inspector General \(OIG\)](#). For additional information on fighting grant fraud and fraud prevention best practices, see the [Grant Fraud webpage](#) on Grants.gov.

16.15 Research Misconduct

[14 CFR part 1275](#), Research Misconduct, establishes procedures that NASA will adhere to when handling allegations of research misconduct related to grants and cooperative agreements wholly or partially funded by NASA. This regulation outlines how the NASA OIG will investigate allegations of research misconduct, the roles of award recipients that have submitted an allegation to NASA, administrative actions that may be taken as a result of research misconduct, and how individuals subject to a research misconduct allegation may appeal NASA's decision.

Allegations of research misconduct concerning NASA research may be transmitted to NASA in one of the following ways: 1) By mail address to the Office of Inspector General (OIG), National Aeronautics and Space Administration, 300 E Street SW., Washington, DC 20546-000; 2) via the NASA OIG Hotline at 1-800-424-9183; or 3) via the OIG's [cyber hotline](#).

16.16 Malign Foreign Talent Recruitment Programs

1. In accordance with section 10631 ([42 U.S.C. § 19231](#)) of the *CHIPS and Science Act of 2022*, covered individuals are prohibited from participating in a Federally-funded research and development project if they are currently participating in a malign foreign talent recruitment program (MFTRP), and they are required to certify that they are not a party to a MFTRP. The definition of MFTRP can be found at [42 U.S.C. § 19237\(4\)](#). Any PI (regardless of level of effort), any CoPI (regardless of level of effort), and only those Co-Is proposing to spend ten percent or more of their time in any given year on a NASA-funded grant or cooperative agreement are designated as covered individuals.
2. Upon completing a biographical sketch and current and pending support form, senior/key personnel will be required to sign a certification statement reading “I also certify that, at the time of submission, I am not a party to a malign foreign talent recruitment program.” See sections 10.5, Biographical Sketches, and 10.6, Current and Pending (Other) Support Disclosures, for more information on these forms.
 - a. [42 U.S.C. § 19232\(a\)\(1\)](#) requires that covered individuals submit a certification stating that they are not a party to a MFTRP annually after proposal submission for the duration of the award. As such, all NASA award recipients shall ensure that senior/key persons have certified annually that they are not a party to a MFTRP in accordance with the entity’s annual certification process. These annual certifications do not have to be submitted to NASA, but award recipients must maintain them in their award files in accordance with their record keeping policies and make them available to NASA upon request in accordance with 2 CFR § [200.334](#), Retention requirements for records, and § [200.337](#), Access to records.
3. Upon submitting a proposal in [NSPIRES](#), entities’ AORs will be required to certify that all senior/key persons associated with the proposal have been made aware of and have complied with their responsibility under [42 U.S.C. § 19232](#) to certify that they are not a party to a MFTRP.

Chapter 2: Award

The guidance in this chapter pertains to the award phase of the grant life cycle. The award phase begins once a NASA funding organization has recommended a proposal to a NASA GO for funding. During the award phase, NASA's GOs conduct administrative and financial reviews on selected proposals, perform a risk assessment for each award, and compile the award documents. The award phase concludes when a NASA GO issues a grant or cooperative agreement to the selected entity.

17.0 Information Contained in a NASA Award

Per 2 CFR § [200.211](#), Information contained in a Federal award, all NASA awards will contain the following information:

1. Federal award performance goals
 - a. Performance goals, indicators, targets, and baseline data may be included in NASA awards, where applicable. NASA will also specify how performance will be assessed in the terms and conditions of the award, including the timing and scope of expected performance (See section 26.0, Performance Measurement, for more information.). If this information is applicable, it must be included in the award's terms and conditions.
2. Recipient name
3. Recipient's UEI
4. Unique Federal Award Identification Number (FAIN) (i.e., award number)
5. Federal award date
6. POP start and end dates
7. Budget period start and end date
 - a. If the POP will include multiple budget periods, the award must indicate that subsequent budget periods are subject to the availability of funds, program authority, satisfactory performance, and compliance with the terms and conditions of the award.
8. Amount of Federal funds obligated by the action
9. Total amount of Federal funds obligated
10. Total approved cost sharing, where applicable

11. Total amount of the Federal award including approved cost sharing
12. Budget approved by NASA
13. Federal award description
14. Name of Federal agency (i.e., NASA) and contact information for awarding official
15. Assistance Listing number and title
16. Identification of whether the award is R&D
17. Indirect cost rate for the award (including if the de minimis rate is charged per 2 CFR § [200.414](#), Indirect (F&A) costs).

The [NF 1687](#) is the cover page for all NASA awards. Terms and conditions for awards with U.S. organizations will be incorporated by reference, unless otherwise specified in the [GCAT](#), which contains the full text of the NASA terms and conditions. Terms and conditions for awards with foreign organizations will be incorporated in the award in full text. An acceptance block may be added when the GO finds it necessary to require bilateral execution of the award. Program budgets are not generally attached to the award document. When it is necessary to attach the budget due to revisions to the original proposed budget or other reasons, this information should be suitably marked as confidential, and is not to be disclosed outside the Government without the consent of the award recipient.

Grants and cooperative agreements will be sequentially numbered with a 13-digit FAIN, otherwise referred to as an “award number.” The identification numbering system to be used for all types of NASA grants and cooperative agreements will be applied as follows:

- Agency Prefix: NASA is represented by 80.
- Center: The Center is represented by four characters.
- Fiscal Year: Current Fiscal Year (FY) will be represented by two digits.
- Grant or Cooperative Agreement: Grant is coded K and Cooperative Agreement is coded M.

For example, FAIN “80NSSC25K0001” would be the first grant issued by the NSSC in FY 2025.

80	NSSC	25	K	0001
NASA	Center	FY25	Grant	Serial No. 1

17.1 Budget Period and Period of Performance

All NASA awards must state a budget period and POP, which can be found in the terms and conditions attached to each NASA award. The budget period is the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward. A POP is the total estimated time interval between the start of an award and the planned end date, which may include one or more budget periods. Identification of a POP in an award does not commit NASA to funding the award beyond the currently approved budget period.

Typically, the duration of an award does not exceed five years unless it is in the Government's best interest or otherwise specified by a program's unique needs, policies, or procedures. New awards that exceed \$5 million and a five year POP will require additional review and approvals by NASA. Requests for additional funding or time on existing awards that will result in the award exceeding \$5 million and a five year POP will also require prior approval from NASA, and recipients must submit requests to the GO at least **90** days prior to the end of the POP.

18.0 Funding and Funding Increments

NASA may support an award as outlined in the proposal budget, may offer to fund only selected tasks, may offer to fund all tasks for a shorter duration (e.g., a one-year pilot study), or a combination of the above.

For multiyear awards, NASA may provide support in increments (e.g., by fiscal year to diminish uncosted carryover), may provide support for more than one year, or may provide full support for the total award amount at time of award issuance.

19.0 Risk Assessment

19.1 Overview

In accordance with 2 CFR § [200.206](#), Federal agency review of risk posed by applicants, NASA GOs are required to conduct a risk assessment for each award applicant prior to making an award to that entity. The purpose of the risk assessment is to determine a potential Federal award recipient's risk of fraud, waste, and abuse and their ability to effectively manage Federal awards. NASA requires that the risk assessment be conducted for all award recipients regardless of the award amount. The risk assessment process consists of two primary components: 1) An entity-specific risk assessment that includes a range of evaluation questions pertaining to an applicant's administrative, programmatic, and financial management capabilities, and 2) an award-specific risk assessment that includes evaluation questions pertaining to a specific award. In addition to determining a recipient's risk, this assessment is also used to inform the level of post-award monitoring required for a recipient.

NASA requires that risk assessments utilize data from multiple government-wide repositories such as the [Responsibility/Qualifications section](#) of SAM.gov (formerly the Federal Awardee Performance and Integrity Information System (FAPIIS)), the Federal Audit Clearinghouse ([FAC](#)), and [USAspending.gov](#). Additional internal data collection systems, such as the NASA Enhanced Procurement Data Warehouse, must also be used to access information required to complete the risk assessments.

19.2 Risk Assessment Methodology

NASA conducts a risk assessment using a series of risk evaluation questions. These questions assess an applicant's administrative risk profile, history of performance and compliance, and financial controls and capabilities in compliance with [2 CFR 200](#). The evaluation questions are grouped into three categories: Administrative, Programmatic & Compliance, and Financial.

- **Administrative Questions:** These questions pertain to the recipient's organizational type, size, prior experience managing Federal awards, and complexity of awards managed.
- **Programmatic & Compliance Questions:** These questions pertain to the recipient's prior findings on single audits and financial statement audits.
- **Financial Questions:** These questions pertain to the amount of Federal funding an award recipient manages.

Risk categories and the evaluation questions in each category are weighted and assigned a numerical score. Once all evaluation questions have been answered, a risk determination is generated, and this risk determination informs the type and extent of post-award monitoring activities to be implemented.

19.3 The Risk Assessment Process

Two key components of NASA's risk assessment are the entity-specific risk assessment and the award-specific risk assessment. The entity-specific risk assessment contains evaluation questions to address the full set of NASA risk assessment criteria. The award-specific risk assessment contains fewer evaluation questions that focus on award-specific risk indicators.

NASA requires completion of the entity-specific risk assessment at least once every three calendar years for each recipient organization regardless of award amount. The result of the entity-specific risk assessment will apply to all awards issued to that entity over the three years in which that assessment is valid. If an entity-specific risk assessment has been completed for an entity within the past three calendar years, then NASA requires that only an award-specific risk assessment be conducted prior to issuing each new award. The risk scores resulting from the entity- and award-specific assessments will then be combined to produce the overall risk

determination that will guide post-award monitoring for the new award being issued. Risk determination will fall into one of three tiers as follows:

Table 4 – Risk Tiers

Risk Tier	Risk Score Percentage	Risk Status
Tier 1	0% - 50%	Low
Tier 2	51% -80%	Medium
Tier 3	81% -100%	High

All Tier 1 recipients will be subject to routine post-award monitoring. All Tier 2 and Tier 3 recipients will be subject to routine post-award monitoring and may be subject to additional terms and conditions based on the GO’s discretion.

19.4 Specific Conditions

Applicants designated Tier 2 or Tier 3 as described in section 19.0, Risk Assessment, may be subject to additional specific terms and conditions to mitigate risk. NASA considers applicants with Tier 2 and Tier 3 designations to have elevated risk profiles.

If an applicant’s risk profile is identified as a Tier 2 or Tier 3, NASA may apply a specific term and condition that is consistent with the program design reflected in [§ 200.202](#), Program planning and design; includes clear performance expectations of recipients as required in [§ 200.301](#), Performance measurement; and considers the particular circumstances that cause an applicant’s risk to be elevated. For example, an applicant that has an audit history of poor financial management may be assigned a specific term and condition requiring additional financial reporting and technical assistance to improve financial management capabilities within the recipient organization. If the applicant has a history of poor project performance on NASA awards, the applicant may receive a specific term and condition that requires additional project monitoring and/or additional prior approvals relevant to the NASA funded program.

2 CFR § [200.208\(c\)](#), Specific conditions, provides examples of the types of specific terms and conditions that may be included in a Federal award. To properly mitigate an applicant’s risk, one or a combination of the following terms and conditions may be deployed:

1. Requiring payments as reimbursements rather than advance payments;
2. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given performance period;
3. Requiring additional, more detailed financial reports;

4. Requiring additional project monitoring;
5. Requiring the recipient to obtain technical or management assistance; or
6. Establishing additional prior approvals.

2 CFR § [200.208\(d\)](#) provides further requirements for NASA when imposing specific terms and conditions. NASA must consider and notify the applicant of the following:

1. The nature of the additional requirements;
2. The reason why the additional requirements are being imposed;
3. The nature of the action needed to remove the additional requirement, if applicable;
4. The time allowed for completing the actions if applicable; and
5. The method for requesting reconsideration of the additional requirements imposed.

Once agreed upon, the specific term and condition will be added to the term and conditions section of the NASA Notice of Award. The specific term and condition must be promptly removed once the conditions that prompted the inclusion of the specific term and condition have been satisfied and NASA deems the cause of the elevated risk sufficiently mitigated.

Per 2 CFR § [200.206](#), Federal agency review of risk posed by applicants, NASA may modify an entity's risk assessment at any time during the award's POP, which may justify changes to the terms and conditions of an award. If NASA modifies a risk assessment and determines that specific terms and conditions are required, award recipients will be notified via an update to their Notice of Award.

20.0 Budget Analysis

The recipient institution is responsible for ensuring that costs charged are allowable, allocable, and reasonable under the applicable cost principles set out in [2 CFR 200](#) for educational organizations, non-profit organizations, state governments, local governments and tribal governments and [FAR subpart 31.2](#) for for-profit organizations. NASA does not allow the payment for profit or fee through grant awards.

NASA will conduct and document a budget analysis of the proposed work. The purpose of this analysis is to determine if all the proposed costs are allowable, allocable, and reasonable under the applicable cost principles in 2 CFR 200 (or FAR [subpart 31](#) for awards to for-profits). Proposals for multiple year awards shall describe the entire research project and include a complete budget for year one, separate estimates for each subsequent year, and a cumulative

budget for the entire POP. To minimize requests for additional detail from the applicant, applicants shall submit proposal budgets and budget narratives in accordance with section 10.8, Proposal Budget: Budget Narrative and Budget Details.

21.0 Evaluation of Pre-award Costs

Pre-award costs are those incurred prior to the effective date of an award directly pursuant to the negotiation and in anticipation of the award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the award's POP start date. If charged to the award, these costs shall be charged to the initial budget period of the award, unless a NASA GO specifies otherwise.

Per 2 CFR § [1800.210](#), Pre-award costs, NASA has waived the requirement for award recipients to obtain written approval prior to incurring project costs up to 90 calendar days before NASA issues an award. However, expenses incurred more than 90 calendar days before the award require prior written approval from a NASA GO. *All* costs incurred before NASA makes the award are at the recipient's risk (i.e., NASA is not required to reimburse such costs if for any reason the recipient does not receive an award or if the award is less than anticipated and inadequate to cover such costs). If a NASA GO provides approval for an entity to incur pre-award costs and NASA ultimately does not issue an award to that entity, NASA is not required to reimburse that entity for the pre-award costs incurred. The NASA approval only allows the entity to charge its pre-award costs to a NASA award if the entity receives an award.

22.0 Indirect Costs

1. Indirect costs are costs incurred for a common or joint purpose benefitting more than one cost objective and that cannot be readily identified with a particular final cost objective. Indirect costs, also known as facilities and administrative costs or overhead, must be applied to awards in accordance with 2 CFR 200, [Subpart E](#), and can only be charged to an award when:
 - a. The recipient has a Negotiated Indirect Cost Rate Agreement (NICRA), or
 - b. If the recipient does not have a current Federally-negotiated indirect cost rate, it may elect to charge a de minimis rate of up to 15 percent of the MTDC. No documentation is required to justify the 15 percent de minimis indirect cost rate (see 2 CFR § [200.414](#), Indirect (F&A) costs, for more information).
2. Per 2 CFR § [200.412](#), Classification of costs, there is no universal rule for classifying certain costs as direct or indirect costs. Costs incurred for the same purpose in like circumstances must be treated consistently as either a direct or indirect cost to avoid possible double-charging of Federal awards. Although there is no universal rule for

classifying direct or indirect costs, there are certain costs described in 2 CFR 200, Subpart E, that may only be charged to Federal awards as a direct or indirect cost. For example, costs of bonding required by recipients in the general conduct of operations are only allowable as indirect costs (see 2 CFR § [200.427](#), Bonding costs), and equipment expenditures are only allowable as direct costs (see 2 CFR § [200.439](#), Equipment and other capital expenditures).

3. NICRA rates and the 15 percent de minimis rate shall only be applied to the MTDC in the award budget. Per 2 CFR § [200.1](#), MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward (regardless of the POP of the subawards issued under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$50,000. Other items may be excluded only when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.
 - a. NASA Fellowship and Scholarship awards shall not provide for the payment of facilities and administrative, overhead, or indirect costs per the definition of MTDC above.
 - b. For a definition of “participant support costs” and “participant”, see section 1.1, Definitions.
4. Award applicants may voluntarily choose to apply an overhead rate that is lower than their approved NICRA rate or the 15 percent de minimis rate. However, NASA will not encourage or coerce applicants or award recipients to apply a lower rate.
5. The Department of Interior (DOI) is responsible for determining and approving indirect rates for entities in which NASA is the cognizant agency. The DOI’s contact information is:

[DOI Interior Business Center](#)
650 Capitol Mall, Suite 4-300
Sacramento, CA 95814-4706
Phone: 916-930-3803 Fax: 916-930-3804
Email: ICS@IBC.DOI.Gov

23.0 Cost Sharing

1. Cost sharing is any portion of project costs not paid by Federal funds (unless otherwise authorized by Federal statute). Cost sharing must be a specific amount or a percentage of the Federal award amount, and 2 CFR § [200.306\(b\)](#), Cost sharing, defines the types of contributions that a Federal agency may accept as an award recipient’s cost share. All

cost share expenditures must be allowable, allocable, and reasonable and comply with 2 CFR 200 [Subpart E](#) – Cost Principles.

2. NASA may require mandatory cost sharing in proposals if the mandatory cost sharing requirement is explicitly stated in a NOFO. If an applicant's mandatory cost sharing will be considered in the application review process, the NOFO must also specifically address how cost sharing will be considered.
3. Per 2 CFR § [200.306](#), Cost sharing, NASA will not consider voluntary committed cost sharing in the proposal merit review process for research awards, unless authorized by Federal statutes or NASA regulations. If voluntary committed cost sharing will be considered in the merit review process for non-research awards, then the applicable NOFO will specify how an applicant's proposed cost sharing will be considered.
4. Recipient's cost share proposals are approved when the cost share is identified in the official award budget, and a GO has issued the award. Mandatory and voluntary cost sharing must be verifiable from the recipient's records, and those records are subject to audit. Should the recipient become aware that it may not be able to meet the cost share requirement, the recipient shall notify its NASA GO and request that the approved cost sharing amount be revised. This request must describe why the cost sharing contribution cannot be met and how the recipient plans to continue or close out the project in the absence of the approved cost share. If the GO approves the request, then the award must be modified through an amendment, and the award amount may be reduced in proportion to the cost share not provided. If the GO does not approve the request, then the award may be terminated. All requests and amendments regarding the modification of cost share contributions and any relevant supporting documentation must be included in the GO's award file.
5. When a recipient's mandatory or voluntary cost share is approved, the recipient is obligated to meet that cost share requirement and report on contributions. Recipients' Federal Financial Reports (FFR) (SF-425), which must be submitted semi-annually, must describe cost share contributions in the "Recipient Share" section. If cost share requirements are not met, the recipient may be deemed non-compliant with the required award terms and conditions, and remedies for noncompliance may be applied. See section 34.0, Remedies for Noncompliance, of this Manual for more information.

24.0 Terms and Conditions

24.1 Terms and Conditions in Award Document

The [GCAT](#) contains the full text of NASA's terms and conditions and prescribes when the terms and conditions apply.

1. Unless otherwise specified, the terms and conditions outlined in sections one through 5.10 of the GCAT apply to all NASA awards. Sections one through six of the Special Terms and Conditions apply, where applicable. Additionally, the following requirements apply to all awards:
 - a. [2 CFR part 25](#), Universal Identifier and System for Award Management;
 - b. [2 CFR part 170](#), Reporting Subaward and Executive Compensation Information;
 - c. [2 CFR part 175](#), Award Term for Trafficking in Persons;
 - d. [2 CFR part 182](#), Government-wide requirements for Drug-Free Workplace;
 - e. [2 CFR part 183](#), Never Contract with the Enemy. (Note: This part only applies when an award is performed outside the United States, including U.S. territories; is in support of a contingency operation in which members of the Armed Forces are actively engaged in hostilities, and the award is expected to exceed \$50,000); and
 - f. [2 CFR part 184](#), Buy America Preferences for Infrastructure Projects
2. NASA will also include the following terms and conditions when applicable:
 - a. Cross-Waiver of Liability for International Space Station Activities
 - b. Cross-Waiver of Liability for Science or Space Exploration Activities Unrelated to the International Space Station
 - c. Personal Identity Verification of Recipient Personnel
 - d. Buy America Preference for Infrastructure Projects
 - e. Program Specific Terms and Conditions

25.0 Awards with Government Furnished and Award-funded Property

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 et seq.](#), 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.

When an award recipient is not a nonprofit institution of higher education or a nonprofit organization whose primary purpose is conducting scientific research, title to equipment purchased with award funds does not automatically vest in the recipient. As such, NASA must perform certain property administration duties to ensure that the equipment is being utilized in accordance with award terms and conditions. NASA may either elect to conduct property administration activities itself or delegate property administration activities to a Federal Industry Partner (FIP).

Additionally, award recipients that are not nonprofit institutions of higher education or nonprofit organizations whose primary purpose is conducting scientific research are required to submit annual property reports to NASA via the NASA Electronic Submission System (NESS). Property reports can be submitted in NESS between October 1 and October 31 each year. In NESS, recipients will enter required information, and the system will produce a NF 1018, NASA Property in the Custody of Award Recipients. If an entity needs access to NESS, they should contact their NASA Center Industrial Property Office (IPO), if known, or their GO for assistance.

Chapter 3: Post-award

This chapter provides guidance on activities that take place during the post-award phase of the grant life cycle. The post-award phase begins after an award recipient has received their grant or cooperative agreement. During this phase, award recipients are implementing their project; drawing down and expending funds; submitting performance, financial, and other reports; and submitting post-award amendment requests as required. NASA's post-award activities include monitoring awardee performance, providing payment to the recipient, and issuing amendments, such as no-cost or cost extensions, if needed.

26.0 Performance Measurement

Per section 17.0, Information Contained in a NASA Award, all NASA awards must state performance goals, indicators, targets, and baseline data, where applicable. Per 2 CFR § [200.1](#), Definitions, “performance goal” means a target level of performance expressed as a tangible, measurable objective, against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate. As set forth in 2 CFR 200, in some instances (e.g., discretionary research awards), a performance goal may be limited to the requirement to submit performance reports.

Per 2 CFR § [200.301](#), Performance measurement, NASA must measure award recipients' performance to show achievement of program goals and objectives, share lessons learned, improve program outcomes, and foster adoption of promising practices. Program goals and objectives should be derived from program planning and design. Where appropriate, NASA may include specific program goals, indicators, targets, baseline data, data collection, or expected outcomes (such as outputs, services performance, or public impacts of any of these) with an expected timeline for accomplishment. Where applicable, this should also include any performance measures or independent sources of data that may be used to measure progress.

27.0 Post-award Monitoring

Per 2 CFR § [200.300](#), Statutory and national policy requirements, NASA must manage and administer all awards in a manner so as to ensure that Federal funding is expended, and associated programs are implemented, in full accordance with the U.S. Constitution, Federal law, and public policy requirements. The goal of post-award monitoring is to provide a level of oversight that will allow NASA to collect accurate data on award performance throughout the life of the award and ensure recipient compliance with applicable rules and regulations. The specific objectives of on-going award monitoring and oversight are to:

- Ensure the achievement of an award's goals and objectives.
- Identify and track awards results.

- Identify the technical assistance needs of award recipients.
- Ensure timely expenditure of award funds.
- Prevent fraud, waste, and abuse.
- Identify innovative tools and techniques for the achievement of award objectives.
- Identify best practices to assist in effective award management.

NASA is 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 FFRs (SF-425) and all other reports that may be required (See [Appendix C](#) for a full list of required reports).

NASA has developed a risk-based portfolio management approach to ensure that recipients administer grants and cooperative agreements in compliance with Federal laws and regulations and NASA policies. With the goal of managing risk and providing broad oversight coverage of its award portfolio, NASA identifies the risk associated with individual awards and the recipients that manage them and utilizes that information to plan and manage its oversight activities. NASA's award monitoring and oversight approach includes three interrelated areas of activity that, taken together, comprise NASA's Monitoring Program:

- **Risk assessment** – NASA conducts a risk assessment of proposals selected for funding to determine the comparative level of risk for each recipient. This assessment assists NASA in making decisions about the type of monitoring and oversight activity to implement for each recipient receiving NASA funding.
- **Routine monitoring** – NASA conducts a comprehensive array of routine or recurring post-award administration activities. Routine monitoring seeks to verify that recipient entities implement awards in compliance with Federal regulations and the terms and conditions of NASA award agreements. Examples include, but are not limited to: review and approval of post-award requests from recipients, review and approval of annual/final project and financial reports, and drawdown investigations and expenditure transaction reviews. Routine monitoring, which is conducted on all grants and cooperative agreements regardless of the recipient's risk level, results in the identification of potential issues that require immediate attention or that may require further scrutiny through advanced monitoring or technical assistance.

This combination of monitoring activities supplements other NASA award administration activities and provides internal control checks throughout the grant's life cycle, facilitating both the administration and monitoring of awards and of the recipient entities receiving those awards.

27.1 Transaction Testing

NASA will conduct an expenditure transaction test once every five years during the POP of an award and no earlier than the second quarter of the POP. Awards with a POP of one year or less do not require a transaction test. In general, the purpose of transaction testing is to systematically test all payment/expenditure transactions from a selected quarter; identify potential unallowable, unallocable, or unreasonable costs; and assess the likelihood that recipient errors would result in a material effect on Federal awards. Transaction Testing must be implemented regardless of an award's risk score.

Transaction testing will seek to answer all of the following questions at a minimum:

- Was the cost incurred during the POP?
- Does the cost represent an expressly unallowable cost as cited in 2 CFR [200](#), 2 CFR [1800](#), NASA policies, Federal law or the award terms and conditions?
- Is the cost reasonable and allocable to the award under review?

Following the transaction test, NASA will issue a draft Transaction Review Report to the recipient within 60 days of receipt of the expenditure list from the recipient or 60 days from the due date that the NSSC provided to the recipient for an expenditure list, whichever is later. The draft Transaction Review Report will outline at a minimum, if applicable, instances of questioned or unallowable costs. Questioned and unallowable costs are defined below:

- **Questioned Costs:** A questioned cost can result from a violation, or possible violation, of a statute, regulation, or the terms and conditions of a Federal award. In addition, it could be a cost not supported by adequate documents or appears unreasonable and does not reflect the actions a prudent recipient would take in the circumstances.
- **Unallowable Costs:** An unallowable cost is that which does not meet the criteria for allowable costs as defined in 2 CFR § [200.403](#), Factors affecting allowability of costs.

If there are questioned or unallowable costs identified through the transaction test, NASA will follow-up in writing with the recipient until the expenditure is adequately justified, documentation is received showing that the expense is no longer being charged to the NASA award, or the amount questioned is returned to NASA.

If a recipient does not agree with the questioned or unallowed costs identified by NASA, the recipient has 30 days from the date the Transaction Review Report is issued to dispute the questioned cost or disallowed cost in writing and/or provide additional supporting documentation. If the questioned cost or unallowed cost is not adequately justified with the additional information provided, the finding or recommendation will appear on the Final Transaction Review Report. All decisions regarding the status of an appeal of questioned or unallowed costs rest with the GO.

27.2 Award Recipient Monitoring Responsibilities

The award recipient is responsible for oversight of the operations of the award-supported activities. The recipient shall monitor its activities under NASA awards to ensure compliance with applicable Federal requirements and that performance expectations are being achieved. Additionally, if a recipient issues a subaward, then that recipient is responsible for monitoring the subaward and ensuring that the subaward recipient complies with all applicable Federal statutes, regulations, and award [terms and conditions](#). See 2 CFR § [200.329](#), Monitoring and reporting program performance, for more information award recipients' monitoring requirements. Also see 2 CFR § [200.332](#), Requirements for pass-through entities, for more information on pass-through entities' award management and subaward monitoring requirements.

28.0 Payments

28.1 Advance Payment Requirements

Per 2 CFR § [200.305](#), Federal payment, the default payment method will be an advance payment for recipients except where they have demonstrated an inability or unwillingness to maintain written procedures or a financial management system, or if they have shown to pose a risk during Agency review, and reimbursement rather than advance payment is imposed as a specific condition to the award.

NASA uses an advance payment method to aid in minimizing the time elapsing between the transfer of funds from the Department of Treasury and the disbursement by the recipient, whether the payment is made by electronic funds transfer or issuance or redemption of checks, warrants, or payment by other means. The advance payment allows the recipient to withdraw cash concurrently with disbursements. Advance payment mechanisms include, but are not limited to, Treasury check and electronic funds transfer and should comply with applicable guidance in [31 CFR part 208](#).

1. In accordance with 2 CFR § [200.305](#), Federal payment, NASA uses the advance payment method unless it has determined that the recipient has not met the minimum criteria for advance payment. The recipient will demonstrate a willingness to maintain:
 - a. Written procedures that will minimize the time elapsing between the drawdown of funds and their disbursement.
 - b. Financial management systems that meet the standards as established in 2 CFR § [200.302](#), Financial management.
 - c. When applicable, specific conditions as set by NASA.

2. If the recipient is unable to meet these criteria and has been determined to not have enough working capital when the reimbursement method is designated, NASA may provide cash as a working capital advance with subsequent reimbursement payments. Under this modified advance payment method, NASA would advance a cash payment to the recipient to cover estimated disbursement needs for an initial period, which is generally based on the recipient's disbursing cycle. Refer to 2 CFR § [200.305](#) (b)(4) for additional information on the use of this method.

28.2 Advance Payment Administration

NASA uses a service provider, currently the Department of Health and Human Services (HHS) [Payment Management System](#) (PMS), to provide Federal funds to recipients. PMS will provide instructions to the recipients for registering and requesting funds through the system.

1. NASA pays states in accordance with [31 CFR part 205](#) and Treasury Financial Manual 4A-2000.
2. Recipients will submit requests for funds electronically through the PMS that (a) are the minimum amount of funds needed; and (b) are scheduled so that cash drawdowns coincide with actual, immediate cash requirements.
3. Recipients shall promptly refund any balances of undisbursed cash that NASA has provided to them that are not authorized to be retained by the recipient for use in other projects. The only exceptions to the requirement for promptly refunding undisbursed cash balances is when the funds will be disbursed by the recipient within three calendar days.
4. If the request for funds was made erroneously, the recipient shall contact its financial institution and request that the payment be returned. The recipient is responsible for promptly remitting funds to PMS and noting the reason, e.g., excess funds, funds not spent, or interest. Instructions for returning funds are on PMS. PMS reports any interest collected on excess Federal funds to the designated NASA GO and to Treasury.
5. Records created in the process of financial management of Federal awards will be maintained and disposed of in accordance with NASA Records Retention Schedules 1441.1, as provided in National Archives and Administration Records (NARA) [general record schedules requirements](#).

28.3 Payment Withholding

In accordance with 2 CFR § [200.305](#), Federal payment, NASA may withhold payment if required by Federal statute, regulation, or if a recipient has failed to comply with the terms and conditions of an award or the recipient is delinquent in a debt to the United States. If payment is

withheld due to a recipient's failure to comply with an award's terms and conditions, NASA will release funds once the recipient has demonstrated compliance.

29.0 Post-award Reporting Requirements

During the post-award phase, all award recipients will be required to submit various reports in accordance with the reporting requirements in their terms and conditions. In general, each award recipient will be required to submit performance and financial reports. Based on the nature of the funded project or the type of entity receiving the award, additional reports, such as technology reports, inventory reports, invention reports, Federal Funding Accountability and Transparency Act Subaward Reporting System ([FSRS](#)) reports, and peer-reviewed manuscripts, may be required. The subsections below describe general reporting requirements. The table in [Appendix C](#) summarizes the reporting requirements described herein, and award recipients should always consult their terms and conditions to determine which reporting requirements apply to their specific grant or cooperative agreement.

29.1 Performance Report Requirements

All NASA award recipients must submit annual and final performance reports. Annual reports are due to NASA 60 days prior to the annual anniversary of the award's POP start date (e.g., if the POP of an award is October 1 – September 30, the report would be due 60 days prior to October 1.) except in the award's final year or if the award has a POP of less than a year. Awards that are in their final year or have a POP of less than a year are only required to submit final performance reports. Final performance reports are due within 120 days after the expiration of the award's POP. If an award that is in its final year or has a POP of less than a year requires a no-cost extension, recipients will be required to submit a performance report prior to that no-cost extension being processed. Subaward recipients are required to submit their final reports to their pass-through entity within 90 days after the expiration of their subaward's POP.

If necessary, a NOFO or award may require that performance reports be submitted more frequently than annually (e.g., semi-annually or quarterly) but no more frequently than quarterly except in unusual circumstances, such as when more frequent reporting is necessary for effective award monitoring. See [Appendix C](#), Post-award Reporting and Certification Requirements, for a description of all required reports and their due dates.

29.1.1 Information Contained in a Performance Report

The National Science and Technology Council (NSTC) has developed a set of standard performance report data elements for research awards called the Research Performance Progress Report (RPPR), and the National Science Foundation (NSF) hosts an [RPPR website](#) on behalf of the NSTC. The RPPR format benefits award recipients by making it easier for them to administer awards through the standardization of the types of information required in performance reports,

thereby reducing their administrative effort and costs. For all NASA awards, funding organizations must require the RPPR format, unless they have another OMB-approved report format. The RPPR is not a template or form but rather a set of standard data elements against which award recipients will report, and it is not available as a template or form from NASA. Although the format contains the word “research,” the data elements are broad enough to be applicable to all types of awards that NASA may issue.

The RPPR format includes mandatory data elements, mandatory reporting categories, and optional reporting categories. All performance reports must contain the mandatory data elements and reporting category required for RPPRs.

Mandatory RPPR Data Elements

All reports shall include the following data elements on the report’s cover page:

- Federal agency (i.e., NASA) and funding organization (e.g., Mission Directorate, OSTEM, etc.) to which the report is submitted.
- Award number.
- Project title.
- PI name, title, and contact information (e-mail address and phone number).
- Name of submitting official, title, and contact information (e-mail address and phone number), if other than PI.
- Submission date.
- UEI and Employer Identification Number (EIN).
- Recipient organization name and address.
- Recipient identifying number or account number, if any.
- POP start and end date.
- Reporting period end date.
- Report term or frequency (annual, semi-annual, quarterly, other).
- Final Report? Indicate “Yes” or “No.”
- A signature is *not* required on the report.

Mandatory RPPR Reporting Categories

In addition to the data elements above, all NASA performance reports shall report on three mandatory reporting categories:

- “Accomplishments,”
- “Products,” and
- “Participants & Other Collaborating Organizations.”

Descriptions of each of the mandatory reporting categories and instructions on what to include in each of those reporting categories can be found in the [RPPR instructions](#).

Optional RPPR Reporting Categories

Besides the mandatory “Accomplishments,” “Products,” and “Participants & Other Collaborating Organizations” categories, recipients may choose to report on optional reporting categories defined in the RPPR format. Descriptions of the optional categories and instructions for recipients reporting on those categories are available in the [RPPR instructions](#). The optional categories are:

- Impact,
- Changes/problems,
- Special reporting requirements,
- Budgetary information,
- Project outcomes, and
- Demographic information for significant contributors.

Reporting Significant Developments

Events may occur between the scheduled performance reporting dates that have significant impact on the NASA-supported activity. In such cases, the award recipient must inform its cognizant GO and TO or its pass-through entity as soon as the following types of conditions become known:

1. Problems, delays, or adverse conditions that will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.

2. Favorable developments that enable meeting time schedules and objectives sooner or at less cost than originally anticipated or producing more or different beneficial results than originally planned.

When such developments negatively impact the federal award, the notification must include the corrective action plan and any assistance needed to resolve the situation per requirements in 2 CFR § [200.329\(e\)](#).

29.2 Financial Reporting Requirements

All award recipients are required to submit a FFR, otherwise known as a SF-425, in [PMS](#) in accordance with their award's terms and conditions. The SF-425 provides NASA with valuable information such as how much funding an award recipient has drawn down and expended and how much cash the recipient may have on hand. A PMS account is not necessary for applying to a NASA NOFO; however, all recipients will have to obtain a PMS account to submit payment requests and financial reports. PMS user access information can be found on the ["User Access" webpage](#). PMS also maintains a help desk, and their contact information and hours of operation can be found on the [help desk webpage](#).

29.3 New Technology Reports (NTR)

NTRs provide NASA with a means to capture information about technical discoveries, improvements, innovations, and inventions so that the Agency can disseminate it appropriately. NASA requires NASA Form (NF) 1679 to be utilized when a new technology or invention is developed. An Interim New Technology Summary Report (NTSR) is due every 12 months from the start date of an award, and Final NTSRs are due within 120 days after the expiration of an award's period of performance. The NF 1679 and NTSRs can be submitted in the [New Technology Reporting System \(e-NTR\)](#). Award recipients should always consult their terms and conditions to determine if the NTR reporting requirements apply to their specific award.

29.4 FFATA Reporting Requirements

Per [2 CFR 170](#), Reporting Subaward and Executive Compensation Information, award recipients that issue first-tier subawards above \$30,000 shall report those subawards in [FSRS](#). 2 CFR 170 provides detailed guidance as to what information needs to be reported in these systems and the deadlines for submitting this information. Recipient information that is reported to FSRS is ultimately transferred to [USAspending.gov](#) for public display.

29.5 Submitting Manuscripts in PubSpace

1. The NASA Scientific and Technical Information (STI) Compliance and Distribution Services provides instructions on submitting applicable grant and cooperative agreement deliverables, typically final peer-reviewed manuscripts (accepted for publication) containing STI, on the [STI website](#).
2. Unless otherwise stated in a NOFO, NASA grant or cooperative agreement recipients must ensure final peer-reviewed manuscripts (accepted for publication) are available in the NASA-designated repository per instructions found on the [STI webpage](#) within one year of peer-review or publication by a journal, whichever is earlier. Note that some NASA funding organizations require manuscripts to be submitted without any embargo or delay after the publication date, and this requirement will be stated in NOFOs.
3. A [NF 1676](#), NASA Scientific, Technical, and Research Information discovery (STRIVES), is not required from grant or cooperative agreement recipients for release of research products (such as presentations, publications, reports, webpages, etc.) unless specified in the terms and conditions of the award or instructed by the GO. However, recipients are encouraged to submit all such information for inclusion in the NASA STI Repository. [Contact STI Compliance and Distribution Services](#) for assistance.

29.6 Publishing Datasets on Data.nasa.gov

[Data.nasa.gov](#) is a registry of NASA dataset metadata, which enables machine-readable dataset discovery. Making information resources accessible, discoverable, and usable by the public can help fuel entrepreneurship, innovation, and scientific discovery.

This website is a collection of descriptions of datasets; each description is a metadata record. The intention of a data catalog is to facilitate data access by users who are searching for certain types of data. The website hosts both metadata records and/or original datasets. A dataset is an identifiable collection of data products unified by a set of criteria, also referred to as a Dataset Metadata Record (i.e., contains information on authorship, subject, scope, location, and/or time). Data.nasa.gov contains two types of datasets: 1) Dataset Metadata Records, and 2) Data files hosted on the platform. All Dataset Metadata Records cataloged on data.nasa.gov conform to a metadata schema described at [Resources.data.gov](#).

To host data on the Open Data portal, award recipients should:

- Contact the Open Data mailing list (nasa-data@lists.arc.nasa.gov) and describe your entity's data products and whether there is a DMP.
- Be prepared to provide the metadata about your entity's dataset(s) that conform to the requirements of the [Project Open Data Schema v1.1](#).

- Consult the NOFOs to which they applied and their award terms and conditions for specific data archiving requirements as some NASA funding organizations may require data to be archived in locations other than data.nasa.gov.

[Data.nasa.gov](https://data.nasa.gov) can support any file type (machine-readable formats are preferable). NASA may limit file size in some cases. For certain types of data, NASA may specify a more appropriate archive. The website offers the capability to create visualization and RESTful Application Programming Interfaces if your data is in a tabular format. The Open Data team cannot host any data that contain Personally Identifiable Information (PII).

For each dataset your entity plans to host, your entity shall provide the following metadata to the Open Data team:

- Title of dataset
- Description of dataset
- Point of contact (full name and email)
- Keywords or tags that describe or categorize the data
- Proposal number, award number, and/or ORCID
- Area of proposal research area or name of supporting NASA program (if known)
- Number, size, and format/type of data products
- URLs to:
 - Related documents
 - Publication(s) related to this dataset
 - Web pages on the datasets/research
- Information about any software or code that is needed to work with the data
- Any temporal information about the dataset, such as date ranges for when the research was conducted
- Any spatial information about the datasets, such as latitude and longitude coordinates or geographic regions for which the data is relevant
- Any other supporting documentation, such as a data dictionary

29.7 Conflict of Interest Policy and Disclosure Requirements

NASA award recipients are required to maintain a written and enforced COI policy to mitigate the impact of significant financial interests on research integrity and project performance. This section provides relevant definitions, describes COI policy requirements, and describes how NASA will respond to disclosed conflicts.

1. For the purposes of section 29.7, the following definitions apply:
 - a. The term “conflict of interest,” or “COI,” means a situation in which an investigator, or the investigator’s spouse or dependent children, has a significant financial interest that could directly and significantly affect the design, conduct, or reporting of NASA-funded awards.
 - b. The term “significant financial interest” means anything of monetary value, including, but not limited to, salary and any payment for services not otherwise identified as salary (e.g., consulting fees or honoraria), equity interest (e.g., stock, stock options, private equity, or other ownership interests), venture or other capital financing, and intellectual property rights (e.g., patents, copyrights, and royalties from such rights). The term does not include the following:
 - i. Salaries, royalties, or other remuneration paid by the proposing institution to the investigator if the investigator is currently employed or otherwise appointed by the institution;
 - ii. Any ownership interests in the proposing institution if the institution is a commercial or for-profit organization;
 - iii. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles;
 - iv. Income from seminars, lectures, or teaching engagements sponsored by a public or nonprofit entity;
 - v. Income from service on advisory committees or review panels for a public or nonprofit entity;
 - vi. An equity interest that, when aggregated for the investigator and the investigator’s spouse and dependent children, meets both of the following tests: (1) does not exceed \$10,000 in value as determined through reference to public prices or other reasonable measures of fair market value and (2) does not represent more than a five percent ownership interest in any single entity; or

- vii. Salaries, royalties, or other payments that, when aggregated for the investigator and the investigator's spouse and dependent children, are not expected to exceed \$10,000 during the prior 12-month period.
 - c. The term "institution" means any domestic or foreign, public or private, entity or organization that is applying for, or that receives, a NASA research grant or cooperative agreement.
 - d. The term "investigator" means the PI, project director, and any other person, regardless of title or position, identified on the proposed project who is responsible for the design, conduct, or reporting of research funded or proposed for funding by NASA. "Investigator" does not include NASA civil servants.
- 2. All recipients of NASA grants and cooperative agreements (hereinafter "award") shall maintain a written and enforced policy addressing COI. Pass-through entities shall be responsible for ensuring that (1) subaward recipients have their own policies in place that meet the requirements of NASA's COI policy or (2) investigators working for subaward recipients follow the COI policies of the pass-through entity.
- 3. Institutions' COI policies shall:
 - a. Designate an official(s) to solicit disclosures of significant financial interests (including those of the investigator's spouse and dependent children) of investigators that would reasonably appear to be affected by projects funded or proposed to be funded by NASA or in entities whose financial interests would reasonably appear to be affected by such activities.
 - b. Ensure that investigators who are planning to participate in NASA-funded awards disclose to the institution's designated official(s) the investigator's significant financial interests no later than the time of application for NASA-funded awards. Institutions must also require that disclosures are updated during the award's POP, either on an annual basis, or as new reportable significant financial interests are obtained.
 - c. Prior to an institution's expenditure of any funds under a NASA-funded award, institutions shall require the designated official(s) to review investigators' disclosures of significant financial interests, determine whether a COI exists, and, if so, determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce, or eliminate such COI. Examples of conditions or restrictions that an institution or subrecipient might impose to manage, reduce, or eliminate a conflict include, but are not limited to:
 - i. Public disclosure of the COI (e.g., when presenting or publishing the research),

- ii. Monitoring of research by independent reviewers,
 - iii. Modification of the research plan,
 - iv. Change of personnel or personnel responsibilities,
 - v. Disqualification of personnel from participation in all or a portion of the NASA-funded activity,
 - vi. Divestiture of significant financial interests that create the COI (e.g., sale of an equity interest), or
 - vii. Severance of relationships that create the COI.
- d. Establish adequate enforcement mechanisms and provide for employee sanctions or other administrative actions to ensure investigators' compliance as appropriate.
 - e. Institutions may apply COI disclosure standards that are more stringent than section 29.7, Conflict of Interest Policy and Disclosure Requirements (e.g., standards that require more extensive disclosure of financial interests).
4. Institutions shall adhere to the following notification requirements:
- a. Prior to the expenditure of any funds under a NASA-funded award, institutions shall notify the NASA GO(s) listed on the related award(s) in writing of any COI that cannot be satisfactorily managed, reduced, or eliminated in accordance with the institution's policy. In cases in which an institution identifies a COI and manages, reduces, or eliminates it prior to the expenditure of NASA-awarded funds, the institution shall not submit a COI notification to NASA.
 - b. After the expenditure of award funds, institutions shall notify NASA within 60 days of any subsequently identified COI that cannot be managed, reduced, or eliminated.
 - c. Notifications shall include sufficient information to enable NASA to understand the nature and extent of the COI (e.g., award number, name of investigator with the COI, nature of the significant financial interest, etc.).
5. When an institution notifies a NASA GO(s) of a COI that cannot be eliminated, managed, or reduced, the cognizant GO or one of their delegates will report the conflict to the NASA OGC as follows:
- a. GOs will report the conflict to the NSSC's OGC and copy the award's TO. The NSSC OGC then will inform HQ OGC of the reported conflict. In consultation with OGC and the relevant TO, the GO must review the COI and take appropriate action, as necessary.

- i. When an institution notifies NASA of a COI that involves any foreign governments, their instrumentalities, or any other entities owned, funded, or otherwise controlled by a foreign government, the cognizant GO must review the COI and take appropriate action, as necessary, in consultation with the award's TO, OGC, and the NASA Office of International and Interagency Relations (OIIR).
 - ii. If fraud, misrepresentation, or related misconduct is suspected in relation to any COI notification submitted to NASA, then the GO or TO also will refer the matter to the NASA Office of Inspector General (OIG) and OGC's Acquisition Integrity Program.
- b. If a GO must take appropriate actions after conducting the reviews described above, then they will do so in accordance with the remedies for noncompliance and termination provisions in 2 CFR § [200.339](#) through § [200.343](#) and sections 34.0, Remedies for Noncompliance, and 35.0, Award Termination, of this Manual.

29.8 Post-award Biographical Sketch, Current and Pending (Other) Support, and F&E Disclosures

After an entity receives an award, senior/key persons shall disclose new activities that have arisen since submission of the proposal in accordance with the [NASA Pre-award and Post-award Disclosure Requirements](#) table. Senior/key persons shall indicate that there are new disclosures in the first [RPPR](#) that is submitted to NASA after the activity has been disclosed to the entity. Senior/key persons shall indicate that a new activity has been disclosed in the "Participants & Other Collaborating Organizations" section of the RPPR. If there are new disclosures, senior/key persons must prepare, certify, and submit a revised disclosure form, or updated F&E information, with the RPPR.

See sections 10.5, Biographical Sketches; 10.6, Current and Pending (Other) Support Disclosures; and 10.9, Facilities, Equipment, and Other Resources; of this Manual for a definition of senior/key persons and information on pre-award disclosure requirements.

29.9 Mandatory Disclosure of Credible Evidence of Criminal Law Violations

Per 2 CFR § [200.113](#), Mandatory disclosures, an applicant, recipient, or subrecipient of a NASA Federal award must promptly disclose credible evidence of:

- The commission of a violation of Federal criminal law involving fraud, COI, bribery, or gratuity violations (Title 18, U.S. Code), or
- A violation of the civil False Claims Act (31 U.S.C. §§ [3729–3733](#)).

The disclosure must be made in writing to the NASA GO, the pass-through entity (if applicable), and NASA's Office of Inspector General. The NASA OIG may be contacted via the following methods:

- **Online:** NASA OIG [Cyberhotline](#)
- **Phone:** 1-800-424-9183
- **Fax:** NASA OIG Headquarters, Office of Investigations, fax number – 202-358-3914
- **Mail:**
NASA Office of Inspector General
P.O. Box 23089
L'Enfant Plaza Station
Washington, D.C. 20026

30.0 Methods of Procurement

- NASA award recipients must maintain and use written documented procurement procedures consistent with State, local, and/or tribal laws and regulations, as well as the standards set forth in 2 CFR § [200.318](#), General procurement standards. The recipient's documented procurement procedures must conform to the procurement standards identified in 2 CFR § [200.317](#) through 2 CFR § [200.327](#).
- *Micro-purchase Threshold.* According to 2 CFR § [200.320](#), recipients must use one of the methods of procurement prescribed in the regulation. The micro-purchase threshold for acquisitions of supplies or services made under grant and cooperative agreement awards is defined in 2 CFR § [200.1](#), Definitions, and should not exceed the amount set by FAR 2.101, Definitions, unless a higher threshold is requested by the recipient and approved by recipient's cognizant agency for indirect costs.
- *Simplified Acquisition Threshold.* As defined in 2 CFR § 200.1, award recipients are responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and documented procurement procedures. However, this threshold cannot exceed the dollar value established at FAR 2.101, Definitions.
- *Formal Procurement Methods.* Per 2 CFR § [200.320](#), a formal procurement method is required when the value of the procurement transaction under an award exceeds the simplified acquisition threshold of the recipient or subrecipient. Formal procurement methods include publicly soliciting sealed bids or requesting proposals via public notice. Specific requirements for each type of formal procurement method are provided in § 200.320.

Table 5, below, summarizes key procurement standards. Award applicants and recipients should consult 2 CFR § 200.317 through § 200.327 for a complete description of procurement standards.

Table 5 - Procurement Standards

2 CFR Reference	Title	Synopsis of Grant Recipient Responsibilities
§ 200.318	General procurement standards	<p>NASA recipients must:</p> <ul style="list-style-type: none"> • Establish and maintain written procurement procedures, • Maintain oversight to ensure contractor compliance, • Implement COI policies, • Use responsible contractors capable of successful performance, and • Document the history of procurement, including rationale and selection process.
§ 200.319	Competition	<p>NASA recipients must take the following actions:</p> <ul style="list-style-type: none"> • Ensure full and open competition in all procurement transactions consistent with 2 CFR § 200.319. • Maintain procedures to ensure clear and accurate solicitations that include all necessary requirements and evaluation factors. • Avoid practices that restrict competition, such as: <ul style="list-style-type: none"> ○ Unreasonable requirements for firms to qualify, ○ Requiring unnecessary experience and excessive bonding, ○ Noncompetitive pricing practices, ○ Organizational conflicts of interest, or ○ Specifying brand name products without allowing for equivalents.
§ 200.322 & 2 CFR 184	Domestic preferences for procurements and Buy America Preferences for Infrastructure Projects	<p>NASA recipients should prefer the purchase, acquisition, or use of goods, products, or materials produced in the United States, to the greatest extent practical under an award and include this requirement in subawards or contracts issued under the primary award.</p> <p>For NASA projects related to infrastructure, NASA recipients must comply with the guidance at 2 CFR 184 to ensure proper management and accountability of federal funds.</p>

31.0 Change of Principal Investigator or Recipient Institution

During an award's implementation, a PI may need to be replaced or a PI may transfer to a new institution. When a PI needs to transfer to a new institution, the current recipient institution is given an opportunity to find a replacement. The final decision on whether an acceptable replacement is available, or that the research effort should follow the original PI to the new location, is at the discretion of the GO.

1. *Ending awards due to lack of PI replacement.* If the decision is made that the grant will not follow the PI to the new institution, and the current institution does not recommend a substitute for NASA's approval, then the grant with the current institution will be ended by mutual consent or, if necessary, unilaterally by NASA.
2. *Changing a PI at the current institution.* If the decision is made that the grant will not follow the PI to the new institution, and the current recipient institution does recommend a new PI for NASA's approval, then the current recipient shall provide a PI biographical sketch and current and pending (other) support form and any other documentation that might aid in NASA's evaluation of the new PI. If NASA determines that the new PI is acceptable, then NASA may initiate a supplement to change the PI. If NASA does not concur with a recommended new PI and the grant will not follow the PI to the new institution, then the grant with the current institution may be ended by mutual consent or, if necessary, unilaterally by NASA.
3. *PI transfers to new institutions.* If the decision is made that the research activity will follow the PI to the new institution and the funds on the grant are still available, the grant with the current institution may be ended and a replacement grant issued to the new institution. When the termination/new award process is used, a fully endorsed proposal for a replacement grant will be requested from the PI's new institution to continue the research. Although such a proposal will be reviewed in the normal manner, every effort will be made to expedite a decision. Regardless of the action taken on the new proposal, final reports on the original grant, describing the scientific progress and expenditure to date, will be required.
 - a. NASA will not process PI transfer requests made within the last 90 days of the relinquishing entity's POP.
 - b. When transferring research activities, NASA performs steps for a new award, such as determination of appropriate funding for the original institution, receiving in writing the intent of the original institution to relinquish the grant, de-obligating any remaining funds from the original grant with the original institution, ensuring sufficient funds are available for the new institution's proposal, and updating records or files.
 - c. PI transfer request notifications must be submitted to the award's cognizant GO and TO by the relinquishing entity's AOR or PI with the relinquishing entity's and new

institution's AOR copied. PI transfer requests must be initiated while the PI remains with the relinquishing organization. PI transfers from the relinquishing organization to gaining organization will not be processed if the PI has transferred prior to a notification to NASA being submitted. PI transfer requests notifications must include:

From the relinquishing entity:

- i. Relinquishment letter on the entity's letterhead to include date of relinquishment and handwritten or digital signature.
- ii. FFR (SF-425) reflecting the amount to be relinquished with handwritten or digital signature.
- iii. Performance report(s) due, if applicable.

From the new institution:

- iv. Letter of acceptance on the entity's letterhead with handwritten or digital signature.
 - v. Proposal
 - vi. Statement of work (SOW)
 - vii. Budget including justification and narrative
 - viii. NASA certifications, assurances, and representations
 - ix. PI's biographical sketch and current and pending (other) support forms
 - x. AOR and PI contact information (email addresses and phone numbers)
- d. The relinquishing organization must submit the final FFR (SF-425) within 30 days of the PI's last day of employment with the relinquishing organization or during the next semi-annual FFR due date, whichever is sooner. If the 30-day window falls between the FFR reporting cycles, the relinquishing organization must submit the final FFR to the award's relevant TO and the NSSC at nssc-grants-pi-transfer@mail.nasa.gov.
4. *Prior approval requirements.* Regardless of the nature of the PI change or transfer, award recipients must also comply with prior approval requirements in 2 CFR § [200.308](#), Revision of budget and program plans, which requires funding agency prior approval when PIs disengage from a project for more than three months or reduce their time and effort devoted to an award by 25 percent or more over the course of an award's POP.

32.0 Administrative Changes and Supplements

1. Requests to have a grant modified must come from the award recipient and must be submitted in writing to the GO for approval.
2. Supplements used to modify grants and cooperative agreements, and a GO will issue an updated NF 1687 to effectuate the supplement. Types of supplements include:
 - a. *No-cost extensions (NCE)*. A supplement used to extend the grant beyond the expiration date at no additional cost to the government. NCEs are awarded when additional time beyond the established POP is required to assure adequate completion of the original scope of work within the available funding.
 - i. In accordance with 2 CFR § [200.308](#), Revision of budget and program plans, a one-time no-cost extension, not to exceed 12 months, can be initiated by the recipient. The recipient must notify the NASA GO via the NSSC's Grant and Cooperative Agreement Administrative Supplement [webform](#) with the supporting reasons and revised POP at least **ten** calendar days before the end of the POP specified in the award. This one-time extension may not be exercised merely for the purpose of using unobligated balances.
 - ii. Requests for approval of subsequent no-cost extensions must be submitted in writing to the NASA GO via the NSSC's Grant and Cooperative Agreement Administrative Supplement [webform](#) a minimum of **45** calendar days before the end of the POP specified in the award.
 - iii. NCEs that will result in an award's total amount exceeding \$5 million *and* POP exceeding five years must be submitted to the NSSC at least **90** calendar days before the POP's expiration. See section 17.1, Budget Period and Period of Performance, of this Manual for more information.
 - iv. NASA may consider NCE requests received after any of the deadlines stated above on a case-by-case basis and with sufficient justification from the award recipient.
 - b. *Funded extensions*. A supplement used to extend the grant beyond the POP expiration date and that would require additional funding. Funded extensions must be supported by a proposal and new technical evaluation submitted at least three months in advance of the POP expiration date (See section 1.8, Extensions, of the NASA GCAT for more information). A funded extension may follow a no-cost extension at the discretion of the cognizant funding organization and with GO final approval.
 - c. *Administrative supplements*. A supplement used to enact administrative revisions to an award. Examples of such revisions are PI changes (See section 1.10, Change in Principal Investigator or Scope, of the GCAT for more information), TO changes, and

general corrections. A NASA GO can unilaterally make minor or administrative changes to a grant.

- d. *Incremental funding supplements.* A supplement used to obligate funding in furtherance of the original scope and total award amount of the approved proposal. (See section 1.7, Incremental Funding, of the GCAT for more information).
 - e. *Augmentations.* A supplement used at any time when work is introduced that is outside the scope of the approved proposal or when there is a need for substantial unanticipated funding. The GO must first determine whether the augmentation requires a separate approval as a non-competitive addition to the scope of the effort to be performed under the grant. Augmentations require the submission of revised budget proposals and technical evaluations covering the additional effort. Since augmentations will be performed within the existing POP, certifications will not normally be required.
 - f. *Change of recipient institution (PI Transfer).* Includes a supplement to end the original award. (See section 31.0, Change of Principal Investigator or Recipient Institution, of this Manual).
 - g. Any combination of the above.
3. *Requesting approval for budget revisions.* When requesting approval for budget revisions, the recipient or subrecipient must use the same format for budget information that was used in its original proposal, unless a NASA GO has approved an alternative format.

33.0 Novation and Change-of-name Agreements

Novation and change-of-name agreements are administrative actions requiring the involvement of the GO. Novation's are legal instruments under which obligations of an organization, (including the performance of grants), are assumed by a new organization arising out of a transfer of assets, usually as a result of a merger or acquisition by the new organization. Change-of-name agreements are legal instruments executed by an organization and NASA that recognizes the legal change of name of the organization without disturbing the original rights or obligations of the parties. Procedures for completing novation and change-of-name agreements are the same as those set forth at [FAR Subpart 42.12](#), Novation and Change of Name Agreements. All novation agreements and change-of-name agreements of the recipient, prior to execution, must be reviewed by NASA OGC for legal sufficiency.

34.0 Remedies for Noncompliance

1. Per 2 CFR § [200.339](#), Remedies for noncompliance, if NASA determines that a recipient's noncompliance with the U.S. Constitution, Federal statutes, regulations, or terms and conditions of an award cannot be remedied by imposing specific conditions, NASA may take one or more of the following actions including, but not limited to:
 - a. Temporarily withholding payment until a recipient takes corrective action,
 - b. Disallowing all or part of the cost of an award activity,
 - c. Wholly or partially suspending or terminating the award,
 - d. Initiating referrals for consideration of suspension or debarment proceedings consistent with [2 CFR part 180](#), OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement) as adopted by NASA at [2 CFR part 1880](#), Nonprocurement Debarment and Suspension, and
 - e. Withholding further Federal awards for the project or program.
2. *Failure to disclose required information*: If it is determined that a designated individual failed to disclose required information, such as biographical sketch, current and pending support, COI, or criminal violation information, NASA may take one or more of the following actions in addition to those listed in paragraph 1 of this section:
 - a. Refer the failure to disclose to the NASA OIG for further investigation or to Federal law enforcement authorities to determine whether any criminal or civil laws were violated;
 - b. Report the individual or entity in [SAM.gov](#) to alert other Federal agencies to the noncompliance;
 - c. Take such other actions against the individual or entity as authorized under applicable law or regulations.
 - d. In accordance with the *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021*, Section 223(c)(3) ([42 U.S.C. § 6605](#)), in the event a senior/key person fails to comply with the NASA's current and pending (other) support disclosure requirements, no enforcement action as identified in [42 U.S.C. § 6605\(c\)\(2\)](#) for such failure shall be applied to the entity that submitted a proposal unless:
 - i. The entity did not meet the requirements of [42 U.S.C. § 6605\(a\)\(2\)](#);

- ii. The entity knew that a senior/key person failed to disclose information under [42 U.S.C. § 6605\(a\)\(1\)](#), and the entity did not take steps to remedy such nondisclosure before the proposal was submitted; or
- iii. The NASA Administrator determines that:
 - A. The entity is owned, controlled, or substantially influenced by a senior/key person; and
 - B. Such senior/key person knowingly failed to disclose information under [42 U.S.C. § 6605\(a\)\(1\)](#).
3. *Notifications to recipients:* A GO intending to take action in response to a failure to disclose required information per paragraph 1 or 2 of this section, with the exception of paragraph (1)(d), will notify each institution about the specific reason for the action. However, notice of suspension or debarment proceedings will be issued consistent with [2 CFR 180](#), as adopted by NASA at [2 CFR 1880](#). Additionally, if NASA determines that an investigator will be disqualified from participating on an award due to a COI that cannot be managed, reduced, or eliminated, then NASA will offer the institution an opportunity to address the COI prior to taking action on the award.

35.0 Award Termination

Per 2 CFR § [200.340](#), Termination, NASA or a pass-through entity may terminate an award in whole or in part as follows:

1. By NASA or a pass-through entity if a recipient fails to comply with the [terms and conditions](#) of an award.
2. By NASA or a pass-through entity, to the greatest extent authorized by law, if an award no longer effectuates the program goals or Agency priorities.
3. By NASA or a pass-through entity with the consent of the award recipient, in which case the two parties must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated; or
4. By the recipient upon sending to NASA or a pass-through entity written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if NASA or a pass-through entity determines in the case of partial termination that the reduced or modified portion of the award or subaward will not accomplish the purposes for which the award was made, NASA or a pass-through entity may terminate the award in its entirety; or.

5. By NASA or a pass-through entity pursuant to termination provisions included in the award.

Only a NASA GO may officially terminate an award. If an award is terminated, NASA will follow the notification of termination requirements established in 2 CFR § [200.341](#), Notification of termination requirement. When NASA terminates an award prior to the end of the POP due to the recipient's material failure to comply with the award's terms and conditions, the cognizant NASA GO must report the termination in the [Responsibility/Qualification section](#) of SAM.gov, in accordance with requirements at 2 CFR §§ [200.340\(c\)\(1\)-\(c\)\(3\)](#).

35.1 Appealing a Suspended or Terminated Award

This section describes the appeal and reconsideration process that NASA makes available to award recipients concerning suspended or terminated grants and cooperative agreements.

1. 2 CFR § [200.340](#), Termination, authorizes Federal entities to suspend or terminate an award in whole or in part (see section 35.0, Award Termination). After the Federal entity has informed a recipient of its intent to terminate an award, NASA will terminate the award if the recipient:
 - a. Fails to submit a timely appeal or request for reconsideration,
 - b. Fails to provide a satisfactory justification to maintain its Federal assistance award,
or
 - c. Fails to resolve its non-compliance within the time specified by NASA.
2. Per 2 CFR § [200.342](#), Opportunities to object, hearings and appeals, NASA provides recipients the opportunity to appeal and provide information and supporting documentation to dispute the decision to suspend or terminate a Federal assistance award.
3. Per 2 CFR § [200.342](#), NASA must comply with requirements for hearings, appeals, or other administrative proceedings to which award recipients are entitled.
4. If a recipient disagrees with NASA's decision to suspend or terminate, it may appeal that decision in writing to NASA within 30 days of receipt of NASA's written notice. The appeal shall include:
 - a. The reason the decision is being disputed and a justifiable reason its Federal assistance award should not be suspended or terminated. The recipient must provide a satisfactory rationale for maintaining its Federal assistance award.

- b. Details of the methods to resolve its non-compliance within a time to be reviewed and deemed acceptable by NASA (if applicable).
 - c. The appeal will be reviewed by the award's relevant GO, with concurrence from the TO. After review, NASA's initial decision to suspend or terminate an award will be affirmed, modified, or reversed, and this determination will constitute NASA's final decision.
5. NASA will not take any action to terminate or suspend a recipient's award until the recipient has exhausted all of its appeal and reconsideration rights, including judicial review.

36.0 NASA Insignia Guidelines

NASA has formulated guidelines that aim to simplify and expand NASA insignia use by NASA award recipients. Recipients are strongly encouraged to use the NASA Insignia Format identified in section 4.3, Restrictions on the Use of the NASA Seal, Insignia, Logotype, Program Identifiers, or Flags, in the NASA [GCAT](#) and on the [NSSC grants website](#). The purpose of these guidelines is to increase awareness of NASA's mission activities for a broader population.

Chapter 4: Closeout

This chapter addresses the closeout phase of the grant life cycle, which begins as soon as an award's POP expires. During the closeout phase, award recipients and NASA must take action to ensure that awards are closed out in timely manner.

37.0 Closeout Responsibilities

Award closeout is the process by which NASA or a pass-through entity determines that all applicable administrative actions and all required work of the Federal award have been completed by the award recipient. The closeout process ensures that all applicable final reports are received; award deliverables are documented; amounts due to the award recipient are paid; unexpended funds are returned to NASA; and equipment is properly dispositioned, as necessary. Below is a summary of key closeout activities that award recipients and NASA will perform per 2 CFR § [200.344](#), Closeout.

1. Recipient responsibilities:
 - a. Recipients should start preparing for award closeout 90 days prior to the expiration of an award's POP, or upon award termination, to ensure that closeout activities can be completed on time. An award's POP can be found on the NASA award cover page (NF 1687).
 - b. No later than 120 calendar days after the end of the award's POP, all final reports required by an award's terms and conditions shall be submitted to NASA's NSSC closeout team at nssc-closeout@mail.nasa.gov. If a recipient cannot meet the 120-day final report deadline, then it must submit a written request to their award's cognizant GO requesting and justifying a deadline extension. Subaward recipients shall submit their final reports to their pass-through entities within 90 days of their POP ending. A description of required final reports can be found in [Appendix C](#), Post-award Reporting and Certification Requirements, of this Manual. However, recipients should consult their award terms and conditions for applicable reporting requirements.
 - i. When a recipient does not have a final indirect cost rate covering the POP, a final financial report must still be submitted to fulfill the requirements of this section. The recipient must submit a revised final financial report when all applicable indirect cost rates have been finalized.
 - c. Recipients must liquidate all financial obligations incurred under a NASA award no later than 120 calendar days after the conclusion of the POP. When justified, NASA may approve extensions to the 120-day obligation liquidation requirement. If an extension is required, recipients shall submit in writing to their award's GO a request

for extension to the requirement that financial obligations be liquidated within 120 days of POP expiration.

- d. In accordance with 2CFR § [200.403](#), Factors affecting allowability of costs, recipients are permitted to incur administrative closeout costs during the 120-day period chargeable to the award. Despite the allowance to incur closeout costs within the 120-day period, recipients remain responsible for liquidating all financial obligations and submitting their final reports within 120 days of their award's POP expiring.
 - e. Pass-through entities shall make prompt payments to subaward recipients for costs meeting the requirements in 2 CFR 200, [Subpart E](#), Cost Principles.
 - f. Recipients shall promptly refund any balances of unobligated cash that the Federal agency or pass-through entity paid in advance or paid and that are not authorized to be retained by the recipient.
 - g. Pass-through entities shall make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports from subaward recipients are received.
 - h. Pass-through entities shall promptly complete closeout activities once subaward recipients have completed all closeout requirements.
2. NASA responsibilities:
- a. NASA will make prompt payments to award recipients for costs meeting the requirements in 2 CFR 200, [Subpart E](#), Cost Principles.
 - b. NASA will review, and either approve or deny, award recipients' requests for extensions to the requirements that financial obligations be liquidated within 120 days of a POP expiration. Records documenting NASA's review will be maintained in the award file.
 - c. NASA will settle any upward or downward adjustments to the Federal share of costs after closeout reports from award recipients are received. Any upward adjustments will be subject to the availability of funds.
 - d. NASA will make every effort to complete closeout actions no later than one year after the end of the POP unless otherwise directed by authorizing statutes. If the indirect cost rate has not been finalized and would delay closeout, NASA will mutually agree with the recipient to close the award using the current or most recently negotiated rate. However, the recipient is not required to agree to a final rate for the purpose of prompt closeout. Closeout actions include NASA actions in the grants management and payment systems, as well as assessing recipient performance.

- e. If a recipient does not comply with closeout requirements in the award's terms and conditions, NASA may initiate unilateral closeout (i.e., closeout without the cooperation of the recipient), and NASA GOs are required to initiate unilateral closeout within 245 days of the due date of the final report. Moreover, if the recipient does not submit all required reports within one year of the POP end date, NASA will report the recipient's failure to comply in the Responsibility/Qualification section of [SAM.gov](https://www.sam.gov) (formerly FAPIIS).
3. Records must be retained in accordance with 2 CFR § [200.334](#), Retention requirements for records.

Chapter 5: Single Audit

This chapter provides an overview of single audit requirements and responsibilities of NASA and grant recipients in addressing single audit findings. Understanding and implementing the single audit requirements is essential for NASA and grant recipients to ensure the proper use of resources, maintain transparency, and secure eligibility for future finding.

38.0 Single Audit Requirements

A single audit is an organization-wide audit in which an auditor samples and tests program and management practices in accordance with Generally Accepted Government Auditing Standards (GAGAS) and determines whether the auditee has complied with Federal statutes, regulations, and the terms and conditions of Federal awards that may have a direct and material effect on each major program. NASA must ensure recipients are aware of single audit requirements that apply to their organization and their responsibilities related to audits of subrecipients by either providing language in their award agreement or incorporating, by reference, the requirements and responsibilities listed in 2 CFR 200, [Subpart F](#), Audit Requirements.

Any recipient or subrecipient that expends \$1,000,000 or more in Federal awards in its fiscal year must obtain a single audit that meets the requirement of the Single Audit Act (2 CFR Part 200 Subpart F – Audit Requirements, and Appendix XI to 2 CFR Part 200 – Compliance Supplement). Recipients that expend less than \$1,000,000 a year in Federal awards are exempt from Federal audit requirements for that year, except as noted in the 2 CFR 200, Subpart F, Audit Requirements. Recipients that are noncompliant with single audit requirements are subject to the provisions in 2 CFR § [200.339](#), Remedies for noncompliance, and section 34.0, Remedies for noncompliance, of this Manual.

38.1 Responsibilities for Single Audits

1. Recipients must:
 - a. Determine if they have expended \$1,000,000 or more in Federal awards during their fiscal year and procure and arrange for audit services. Recipients may charge the costs of single audits to their awards consistent with 2 CFR 200, [Subpart E](#), Cost Principles, and the recipient's written policies for allocating single audit costs to Federal awards.
 - b. Prepare financial statements, including the schedule of expenditures of Federal awards and provide auditors with supporting documentation.
 - c. Review audit reports and understand all findings and recommendations and prepare a corrective action plan for each finding, specifying responsible parties and timelines for implementation.

- d. Ensure audit reports are submitted in the [FAC](#) within 30 days of receipt from the auditor or within nine months of the end of the fiscal year (whichever is earlier). NASA may authorize an extension for entities in which it is the cognizant agency for audit or oversight agency for audit if the nine-month timeframe would place an undue burden on the recipient. Deadline extension requests should be submitted to the NASA Key Management Audit Liaison listed on the FAC.
- e. Take corrective action on all audit findings and monitor implementation of corrections to ensure resolution of findings.

2. NASA must:

- a. Monitor and ensure the timely submission of single audits in the [FAC](#).
- b. Review all extension requests for single audit submissions and notify the recipient of its decision regarding the request.
- c. Review audit reports to identify any findings related to awards issued by NASA and assess the adequacy of the recipient's corrective action plan and implementation status.
- d. Issue management decision letter for NASA findings within six months of the audit submission.
- e. Ensure timely and appropriate follow-up on all audit findings and ensure corrective actions are implemented effectively.
- f. Take enforcement actions as necessary for non-compliance, which may include withholding of funds, disallowance of costs, or other appropriate measures.

39.0 Appendices

[Appendix A](#) – Certification, Assurances, and Representations

[Appendix B](#) – Waiver of Electronic Submission Requirement Request Process

[Appendix C](#) – Post-award Reporting Requirements

Appendix A – Certifications, Assurances, and Representations

The System for Award Management ([SAM.gov](https://sam.gov)) allows financial assistance registrants to submit common Federal Government-wide certifications and representations. Individuals and businesses (entities) registering on SAM.gov can review and submit financial assistance certifications and representations online.

Separate and apart from the government-wide Certifications and Representations listed in SAM.gov, NASA proposers and recipients must submit certain certifications, assurances, and representations required by statute, executive order, or regulation at the time of proposal and on an annual basis, if the recipients have ongoing and continuing relationships with the Agency. Annual certifications and representations shall be signed by responsible officials with the authority to ensure recipients' compliance with the pertinent requirements. Pass-through entities are responsible for determining how to obtain required certifications from subaward recipients. All certifications required for an application are listed below and will be collected at application via [NSPIRES](#).

A1. Certification of Compliance on Proposal Cover Page.

By submitting the proposal identified in the Cover Sheet/Proposal Summary in response to this Notice of Funding Opportunity (NOFO), the Authorizing Official of the proposing organization (or the individual Proposer if there is no proposing organization) as identified below—

- a. Certifies that the statements made in this proposal are true and complete to the best of his/her knowledge;
- b. Agrees to accept the obligation to comply with NASA award terms and conditions if an award is made as a result of this proposal; and
- c. Confirms compliance with all applicable terms and conditions, rules, and stipulations set forth in the Certifications, Assurances, and Representations contained in this NOFO. Willful inclusion of false information in this proposal and/or its supporting documents, or in reports required under an ensuing award, is a criminal offense ([U.S. Code, Title 18, Section 1001](#)).

A2. Certification Regarding Lobbying.

No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit [Standard Form-LLL](#), "Disclosure Form to Report Lobbying," in accordance with its instructions.

The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subawards, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section [1352, title 31, U.S. Code](#). Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000, and not more than \$100,000 for each such failure.

A3. Assurance and Representation on China Restrictions Set Forth in Section 526 of PL 117-103, and All Applicable Subsequent Appropriations Acts.

By submission of its proposal, the proposer represents that the proposer is not China or a Chinese-owned company, and that the proposer will not participate, collaborate, or coordinate bilaterally with China or any Chinese-owned company, at the prime recipient level or at any subrecipient level, whether the bilateral involvement is funded or performed under a no-exchange-of-funds basis, except to the extent NASA has notified the grant proposer that NASA has sought a waiver for such activities pursuant to Pub. L. 118-42 Sec. 526.

A4. Representation Regarding Whistleblower Protection as provided in PL 113-235 Title VII section 743, all subsequent appropriation acts, and 10 U.S.C. § 4701.

A corporation or prospective recipient represents that employees or contractors of such entity seeking to report fraud, waste, or abuse are NOT required to sign internal confidentiality agreements or statements prohibiting or otherwise restricting such employees or contractors from lawfully reporting such waste, fraud, or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information. Additionally, the corporation or prospective recipient represents that an employee of a contractor, subcontractor, grantee, or subgrantee or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a person or body described in paragraph two of [10 U.S.C. § 4701](#) information that the employee reasonably believes is evidence of gross mismanagement of a National Aeronautics and Space Administration contract or grant, a gross waste of Administration funds, an abuse of authority relating to an Administration contract or grant, or a violation of law, rule, or regulation related to

an Administration contract (including the competition for or negotiation of a contract) or grant. A person who believes that the person has been subjected to a reprisal prohibited by 10 U.S.C. § 4701 subsection (a) may submit a complaint to the [Inspector General of the National Aeronautics and Space Administration](#).

A5. Certification of Compliance with 2 CFR 175 Award Term for Trafficking in Persons.

If the estimated value of services required to be performed under this grant or cooperative agreement outside the United States exceeds \$500,000, then the authorizing official certifies that their organization meets the following requirements prior to receiving a grant or cooperative agreement from NASA:

- (a) The recipient has implemented a plan to prevent the activities described in [2 CFR § 175.105\(a\)](#), Statutory requirement, and is in compliance with the plan;
- (b) The recipient has implemented procedures to prevent any activities described in 2 CFR § 175.105(a), Statutory requirement, and to monitor, detect, and terminate any subrecipient, contractor, subcontractor, or employee of the recipient engaging in any activities described in § 175.105(a); and
- (c) To the best of the recipient's knowledge, neither the recipient, nor any subrecipient, contractor, or subcontractor of the recipient or any agent of the recipient or of such a subrecipient, contractor, or subcontractor, is engaged in any of the activities described in 2 CFR § 175.105(a), Statutory requirement.

See [2 CFR 175](#) for a description of the minimum requirements for a plan to prevent trafficking in persons.

A6. Certification Regarding Disclosure Requirements in the *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021*, Section 223(a)(1) (42 U.S.C. § 6605(a)(1)).

By submission of its proposal, the proposing entity's Authorized Organizational Representative certifies that the entity is in compliance with the *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021*, Section 223(a)(1) ([42 U.S.C. § 6605\(a\)\(1\)](#)), and that each senior/key person that is employed by the entity and listed on the application has been made aware of the requirements under Section 223(a)(1). Section 223(a)(1) provides that "each covered individual listed on the application— (A) disclose the amount, type, and source of all current and pending research support received by, or expected to be received by, the individual as of the time of the disclosure; (B) certify that the disclosure is current, accurate, and complete; and (C) agree to update such disclosure at the request of the agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award."

A7. Certification Regarding Malign Foreign Talent Recruitment Programs per the *CHIPS and Science Act of 2022*, Section 10632 (42 U.S.C. § 19232).

Per Section 10632 of the CHIPS and Science Act of 2022 ([42 U.S.C. § 19232](#)), the entity's Authorized Organizational Representative certifies that each covered individual that is employed by the entity and listed on the application has been made aware of and has complied with their responsibility under that section to certify that they are not a party to a malign foreign talent recruitment program.

Appendix B – Waiver of Electronic Submission Requirement Request Process

Applicants may request a waiver of the requirement for electronic submission if they can provide a compelling reason. The process for applying for a waiver is described below. Questions on applying for a waiver may be directed to NASA contact listed in the funding announcement.

All applicants must register in [SAM.gov](https://sam.gov) and [NSPIRES](https://nspires.gov) even those who intend to request a waiver. If an applicant does not have an active SAM.gov registration prior to submitting its paper application, it will be screened out and returned to the applicant without review. Registration is necessary to ensure that information required for paper submission is available and that the applicant is ready to submit electronically if the waiver is denied.

A written waiver request must be received by NASA at least 20 calendar days in advance of the application due date stated on the cover page of the NOFO. The request must be either e-mailed or mailed (USPS or common carrier) to the NASA contact listed in the funding announcement:

When requesting a waiver, the following information must be included:

1. NASA NOFO, or announcement title and announcement number;
2. Name, address, and telephone number of the applicant organization as they will appear in the application;
3. Applicant organization's UEI number;
4. AOR for the named applicant;
5. Name, telephone number, and e-mail of the applicant organization's Contact Person for the waiver; and
6. Details of why the organization is unable to submit electronically, explaining why their physical location does not have adequate access to the Internet.

The NASA official will either e-mail (if the waiver request was received by e-mail) or express mail/deliver (if the waiver request was received by mail) the waiver decision to the Contact Person no later than seven calendar days prior to the application due date. If the waiver is approved, an application must be submitted either by email or mailed in as a paper copy or using a CD-ROM or similar device. If the waiver is disapproved, the applicant organization must be prepared to submit through [Grants.gov](https://grants.gov) or NSPIRES or forfeit the opportunity to apply. The written approval must be included as the cover page of the paper application and the application must be received by the due date.

A paper application will not be accepted without the waiver approval and will be returned to the applicant if it is not included. Paper applications received after the due date will not be accepted. Instructions for Submitting a Paper Application with a Waiver: Paper submissions must be

postmarked by the date and time specified in the announcement. Applications may be emailed to the NASA contact, shipped using only an overnight delivery company, a courier/package delivery company, or the U.S. Postal Service (USPS). For USPS, Express Mail *must* be used. The applicant will be notified by postal mail that their application has been received.

Note: Mail sent to Federal facilities undergoes a security screening prior to delivery. The applicant is responsible for ensuring that its application will arrive by the application due date and time.

NASA will not accept or consider any applications that are sent by facsimile or hand carried.

If the applicant is submitting a paper application, an original application must be submitted. The original and copies must not be bound, and nothing should be attached, stapled, folded, or pasted. Do not use staples, paper clips, or fasteners; however, rubber bands may be used. In addition to the formatting requirements in [Chapter 1](#), section 10, Developing an Application, the proposer shall submit a single-sided, original version. Any additional copies needed may be printed double-sided. The copies shall be on white 8.5 x 11-inch paper with at least 1-inch (2.5 cm) margins on all sides. Loose-leaf binders, plastic, or permanent covers shall not be submitted.

If the applicant is submitting a paper application, follow the funding announcement's instructions for order in which the required forms and documents are to be submitted. The applicant must follow the formatting instructions included in the funding announcement. Oversized pages (e.g., foldouts, posters) will be proportionally calculated against the page count.

With the exception of standard forms in the application package, all pages in the application shall be numbered consecutively, with a notation "page XX out of XX". This notation helps to check that all the pages were receive

Appendix C – Post-award Reporting and Certification Requirements

In Accordance with 2 CFR 200, 2 CFR 1800, and the GCAM

The table below describes general requirements for reports, publications, and certifications and representations that award recipients are required to submit to NASA. An award’s [terms and conditions](#) may specify additional reporting requirements.

Acronyms used in this section:

- e-NTR – NASA’s New Technology Reporting system
- FMO – Financial Management Office
- FSRS – Federal Funding Accountability and Transparency Act Subaward Reporting System
- GO – Grant Officer
- HHS/PMS – Department of Health and Human Services/Payment Management System
- IPO – Industrial Property Officer
- NESS – NASA Electronic Submission System
- NTR – New Technology Representative or New Technology Report
- PO – Patent Counsel Office
- STI – Scientific and Technical Information
- TO – Technical Officer

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
<p>Research Performance Progress Reports (RPPR) <i>(Required for all grants and cooperative agreements, unless period of performance (POP) is less than one year or award is in its final year.)</i></p>	<p>RPPRs are due annually, 60 days prior to the annual anniversary of the award’s POP start date, except awards in their final year or that are less than one year. For example, if the POP of an award is October 1 – September 30, the report would be due 60 days prior to October 1. (Ref. GCAT, section 4.10)</p> <p>Submit reports to: GO, TO, and NTR</p>	<p>TO, GO, NTR</p>
<p>Semi-annual Federal Financial Report (FFR) <i>(Required for all grants and cooperative agreements except awards where invoicing is required per the terms and conditions of award)</i></p>	<p>Within 30 days following the end of each reporting period (October 1 – March 31 and April 1 – September 30) (Ref. GCAT, section 2.1)</p> <p>Submit reports to: HHS PMS</p>	<p>GO</p>

<p>Post-award Disclosures</p>	<p>Senior/key persons shall 1) indicate that there are new disclosures in the first RPPR that is due to NASA after the new activity has been disclosed to their respective entity and 2) prepare, certify, and submit a revised disclosure form, or updated F&E information, with the RPPR.</p> <p>Submit updated forms to: TO and GO. See section 29.8, Post-award Biographical Sketch, Current and Pending (Other) Support, and F&E Disclosures, of the GCAM for more information.</p>	<p>TO, GO</p>
<p>Annual NASA Form 1018 Property in the Custody of Award Recipients <i>(Required for all grants and cooperative agreements with for-profit organizations and nonprofit recipients not subject to exemptions in 2 CFR § 1800.312)</i></p>	<p>Due not later than October 31 of each year. (Ref. GCAT, section 2.5 and 2.6)</p> <p>Submit reports to: NASA Electronic Submission System (NESS)</p>	<p>FMO, IPO, GO</p>
<p>Disclosure of Inventions and New Technology (NASA Form - 1679) <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i></p>	<p>Within 2 months after inventor discloses it to recipient. (Ref. GCAT, sections 3.1, 3.3, and 3.4)</p> <p>See e-NTR and sections 3.1, 3.3, and 3.4 of the GCAT for submission instructions.</p>	<p>PO, TO, GO, NTR</p>
<p>Election of Title to a Subject Invention <i>(Required for all grants and cooperative agreements)</i></p>	<p>Within 2 years of disclosure of a subject invention being elected, except in any case where publication, sale, or public use of the subject invention being elected has initiated the one-year statutory period wherein valid patent protection can still be obtained in the United States, then at least 60 days prior to the end of the statutory period. (Ref. GCAT, sections 3.1, 3.3, and 3.4)</p> <p>See sections 3.1, 3.3, and 3.4 of the GCAT for submission instructions.</p>	<p>PO, TO, GO</p>

<p>Interim New Technology Summary Report (NTSR) <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i></p>	<p>Every 12 months from the grant/cooperative agreement’s POP start date. (Note: Negative reports are required.) (Ref. GCAT, sections 3.1, 3.3, and 3.4)</p> <p>See e-NTR and sections 3.1, 3.3, and 3.4 of the GCAT for submission instructions.</p>	<p>GO, NTR</p>
<p>Notification of Decision to Forego Patent Protection <i>(Required for all grants and cooperative agreements)</i></p>	<p>As applicable, not less than 30 days before the expiration of the response period required by the relevant patent office. (Ref. GCAT, sections 3.1, 3.3, and 3.4)</p> <p>See sections 3.1, 3.3, and 3.4 of the GCAT for submission instructions.</p>	<p>PO, TO, GO</p>
<p>Utilization of Subject Invention/Reportable Items <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i></p>	<p>Every 12 months from the date a subject invention is elected. Note: Negative reports are required. (Ref. GCAT, sections 3.1, 3.3, and 3.4)</p> <p>See sections 3.1, 3.3, and 3.4 of the GCAT for submission instructions.</p>	<p>PO, TO, GO</p>
<p>Federal Funding Accountability and Transparency Act (FFATA or Transparency Act) Subaward Reporting <i>(Required for all grants and cooperative agreement recipients that issue first-tier subawards above \$30,000)</i></p> <p><i>EXEMPTION: If, in the previous tax year, the recipient or subrecipient had gross income, from all sources, under \$300,000, they are exempt from the requirements to report subawards.</i></p>	<p>No later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2020, the obligation must be reported by no later than December 31, 2020.) (Ref. <i>GCAT</i>, section 4.9)</p> <p>Submit reports to: FSRS</p>	<p>GO</p>
<p>FFATA or Transparency Act Executive Compensation Reporting</p> <p><i>Required for all grants and cooperative agreement recipients and subrecipients that meet the following criteria:</i></p> <p><i>i. The total Federal funding authorized to date under a Federal award equals or exceeds \$30,000 as defined in 2 CFR §</i></p>	<p><u>Recipients –</u> Report by the end of the month following the month in which this award is made and annually thereafter. See example in the row above.</p> <p><u>Subrecipients –</u> Report to the recipient by the end of the month following the month during which</p>	<p>GO (For prime awards only)</p>

<p>170.320; ii. in the preceding fiscal year, you received— (A) 80 percent or more of your annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR § 170.320 (and subawards), and (B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR § 170.320 (and subawards); and,</p> <p>iii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. § 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings)</p> <p><i>EXEMPTION: If, in the previous tax year, the recipient had gross income from all sources under \$300,000, they are exempt from the requirements to report the total compensation of the five most highly compensated executives of any subrecipient.</i></p>	<p>you make the subaward. See example in the row above. (Ref. <i>GCAT</i>, section 4.9)</p> <p>Submit reports to: FSRS</p>	
<p>Data and Research Reporting (Required for all grant and cooperative agreement recipients subject to the “Access to Research Results” terms and conditions)</p>	<p>Recipients shall comply with the data reporting requirements described in their approved Data Management Plan. Unless otherwise stated in a NOFO, final peer-reviewed manuscripts (accepted for publication) shall be submitted within one year of peer-review or publication by a journal, whichever is earlier. (Ref. GCAT, section 3.5)</p> <p>Submission instructions: Submit to the NASA-designated repository per instructions found on the STI Compliance and Distribution Services website.</p>	<p>TO, STI</p>
<p>Standard Form - LLL (Disclosure of Lobbying</p>	<p>The SF-LLL must be submitted with each grant or cooperative agreement application,</p>	<p>GO</p>

<p>Activities) (Required for all recipients and sub-recipients, when applicable).</p>	<p>when applicable.</p> <p>Submitted annually thereafter if there are changes to the initial disclosure. (Ref. 31 U.S.C. § 1352, 2 CFR § 200.415(c) and 2 CFR § 200.450)</p>	
<p>NASA Form 1206 (Required for all recipients and sub-recipients)</p>	<p>The NF 1206 must be renewed every three years or updated annually if there are any changes to the recipient’s compliance status.</p> <p>NASA will contact the recipient if an updated NF 1206 is required. Note that as of January 2025 the NF 1206 is currently undergoing an update, and NASA will not request the NF 1206 from applicants or recipients until those updates have been completed.</p>	<p>Cognizant NASA office, GO</p>
<p>Annual Certifications, Assurance, and Representations (Required for all grants and cooperative agreements)</p>	<p>Applicants will sign the certifications, assurances, and representations in GCAM, Appendix A, at application within NSPIRES.</p> <p>The NASA Shared Services Center will contact recipients annually thereafter requesting resubmission of the certifications, assurances, and representations.</p> <p>Submission instructions: Recipients shall submit a signed certifications, assurances, and representations document to the NSSC annually. The NSSC will send recipients an automated message each year requesting the document.</p>	<p>GO</p>
<p>Recipient Integrity and Performance Matters (<i>For recipients that receive more than \$500,000 during an award’s POP</i>)</p>	<p>Submit reports in SAM.gov, when applicable.</p> <p>See Appendix XII of 2 CFR 200 and award terms and conditions for reporting requirements and reporting frequency.</p>	<p>If reported, will be reviewed during risk assessment process (see sec. 19.0, Risk Assessment, of this Manual)</p>
<p>Suspension and Debarment Disclosures (<i>for recipients who, during the performance of the award, learns that it or any of its principals falls under criteria in 2 CFR § 180.335</i>)</p>	<p>Before a recipient enters into a grant award with NASA, the recipient must notify NASA if it knows if it or any of the recipient’s principals under the award fall under one or more of the four criteria listed at 2 CFR § 180.335. At any time after accepting the award, if the recipient learns that it or any of its principals falls under one or more of the</p>	<p>GO, TO</p>

	<p>criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to NASA in accordance with 2 C.F.R. § 180.350.</p> <p>Submission instructions: Email to GO</p>	
FINAL REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
<p>Final Research Performance Progress Report (RPPR) <i>(Required for all grants and cooperative agreements)</i></p>	<p>Final RPPRs are due within 120 days after the expiration date of the grant/cooperative agreement. <i>(Ref. GCAT, section 4.10)</i></p> <p>Submit reports to: GO, TO, and NTR</p>	TO, GO, NTR
<p>Properly Certified Final Federal Financial Report, (FFR) <i>(Required for all grants and cooperative agreements)</i></p>	<p>Within 120 days after the expiration date of the grant/cooperative agreement. <i>(Ref. GCAT, section 2.1)</i></p> <p>Submission instructions: Submit reports to HHS PMS.</p>	FMO, GO
<p>Final New Technology Summary Report (NTSR) <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i></p>	<p>Within 120 days after the expiration date of the grant/cooperative agreement. (Note: Negative reports are required.) <i>(Ref. GCAT, sections 3.1, 3.3, and 3.4)</i></p> <p>See e-NTR and sections 3.1, 3.3 ,and 3.4 of the GCAT for submission instructions.</p>	PO, GO, NTR
<p>Final NASA Form 1018 NASA Property in the Custody of Award Recipients <i>(Required for grants and cooperative agreements with for-profit organizations and nonprofit recipients not subject to exemptions in 2 CFR § 1800.312)</i></p>	<p>Within 120 days after the expiration of the grant or cooperative agreement. <i>(Ref. GCAT, section 2.5 and 2.6)</i></p> <p>Submit reports to: NASA Electronic Submission System (NESS)</p>	FMO, IPO, GO

