

Grant Information Circular

GIC 25-01 06/16/2025

Requirements for Grant and Cooperative Agreement Payment Justifications

PURPOSE: The purpose of this Grant Information Circular (GIC) is to inform NASA grant and cooperative agreement applicants and recipients of new payment justification requirements in accordance with Executive Order (E.O.) <u>14222</u>, Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative.

BACKGROUND: E.O. 14222 requires agency heads to utilize a technological system to record justifications for grant and cooperative agreement payment requests. NASA utilizes the Department of Health and Human Services' (HHS) Payment Management System (PMS) to disburse grant funding to recipients, and this system will be used to record recipients' justifications. In accordance with E.O. 14222, HHS released an update to PMS on March 17, 2025, that introduced a new mandatory justification field in the payment request screen at the subaccount level. NASA award recipients are now required to submit justifications for each payment request submitted in PMS in this new field, which is limited to 1,000 characters. Appendix A provides an example of what the updated PMS payment request screen looks like.

After a payment request is submitted in PMS, the request will be transmitted to the Department of Government Efficiency's (DOGE) Defend the Spend system, and DOGE will send the payment request to NASA for review. To ensure that NASA is able to sufficiently assess recipients' payment justifications, the Agency is establishing standardized payment justification requirements. As of the effective date of this GIC, recipients submitting payment requests for NASA grants and cooperative agreements shall adhere to the payment justification requirements described below. NASA will utilize this information in its payment review process. Please note that this new process may result in delays to payment approvals, and award recipients should plan accordingly.

GUIDANCE: All NASA grant and cooperative agreement recipients shall provide a payment justification at the subaccount level for each payment request. The justifications shall state how much funding is being requested, to which budget cost category the request is related, and why the payment is required. Recipients must use budget categories from their NASA award's most recently approved budget (e.g., "Personnel", "Fringe Benefits," "Equipment," etc.).

Examples of acceptable payment justifications are as follows:

1. "Payment is requested for key personnel working on the award in accordance with the pre-approved budget categories of Salaries and Fringe Benefits."

- 2. "Payment is requested for airfare costs in accordance with the pre-approved budget category Travel."
- 3. "Payment is requested for general office supplies in accordance with the pre-approved budget category Indirect Costs."

After payment justifications are submitted, NASA will review the justifications, either approve the payment or request clarification from the recipient, and record the Agency's determination within the DOGE - Defend the Spend system.

EFFECTIVE DATE: June 16, 2025

REGULATION OR TERM AND CONDITION CHANGES: No.

HEADQUARTERS CONTACTS: Office of Procurement, Procurement and Grants Policy Division, Grants Policy and Compliance, e-mail: hq-dl-grants-policy-compliance@mail.nasa.gov.

Appendix A – Updated PMS Payment Request Screen

