



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular

GIC 25-02
06/09/2025

Revisions to Termination Appeal Guidance

PURPOSE: To inform NASA grant and cooperative agreement applicants and recipients of revisions to *NASA Grant and Cooperative Agreement Manual* ([GCAM](#)), section 35.1, Appealing a Suspended or Terminated Award.

BACKGROUND: The GCAM provides guidance to NASA's grant and cooperative agreement applicants and recipients, and section 35.1 outlines procedures to which award recipients shall adhere if the entity chooses to appeal a suspended or terminated award.

NASA is revising parts of GCAM section 35.1. Specifically, section 35.1(4) is revised to clarify that recipients have 30 calendar days to appeal NASA's decision to terminate an award. Section 35.1(4)(c) is revised to provide only the information that is pertinent and useful to award recipients. Language removed from GCAM section 35.1(4)(c) will be added to NASA's internal process manual – the NASA Grant and Cooperative Agreement Procedures (GCAP). Additionally, section 35.1(5) is being revised to clarify the point in the termination process at which NASA will proceed with executing the termination of an award.

GUIDANCE: The revisions to GCAM section 35.1 are effective as of the publication date of this GIC and are as follows:

Section 35.1(4)

- Current language: “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.”
- Revised language: “If a recipient disagrees with NASA’s decision to suspend or terminate, it may appeal that decision in writing to NASA within 30 calendar days of receipt of NASA’s written notice of intent to terminate.”

Section 35.1(4)(c)

- Current language: “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.

- Revised language: “After reviewing the appeal, 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.”

Section 35.1(5)

- Current language: “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.
- Revised language: “NASA will issue a notice of intent to terminate to recipients and will not proceed with finalizing the termination until the appeal of NASA’s decision is resolved or the deadline to submit an appeal has passed, whichever comes first.”

EFFECTIVE DATE: June 9, 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.