



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular (GIC)

GIC 25-03
09/23/2025

GUIDANCE ON TRANSITION TO SAM.GOV FOR SUBAWARD REPORTING AND iEDISON FOR NEW TECHNOLOGY REPORTING

PURPOSE: To provide guidance on system changes and reporting requirements, where applicable. This GIC amends the NASA Grant and Cooperative Agreement Manual ([GCAM](#)) and the NASA Grant and Cooperative Agreement Terms and Conditions ([GCAT](#)) and redirects recipients to use the System for Award Management ([SAM.gov](#)) for subaward reporting. This GIC further redirects NASA grant recipients to use [iEdison](#) for new technology reporting and amends NASA policy on the associated reporting requirements.

BACKGROUND:

SUBAWARD REPORTING – Title 2, Code of Federal Regulations (CFR), Part 170, Reporting Subaward and Executive Compensation Information, requires award recipients to submit reports regarding first-tier subawards in Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System (FSRS) and total compensation of recipient executives in SAM.gov as part of their annual registration. Recipients are required to submit this information per the Federal Funding Accountability and Transparency Act of 2006. (Authority: [Pub. L. 109-282](#).) The U.S. General Services Administration's (GSA's) Integrated Award Environment announced that it has retired the use of [FSRS.gov](#) and transitioned subaward reporting functions to [SAM.gov](#), effective March 6, 2025. This effort is the next step in the ongoing work to enhance the user experience, create a more secure reporting environment, and transition disparate systems used for navigating the federal awards cycle into one streamlined, unified SAM.gov system.

NEW TECHNOLOGY REPORTING – The National Institute of Standards and Technology (NIST) has general oversight of technology transfer responsibilities under the Federal Technology Transfer Act of 1986 (15 U.S.C. § 3710) including associated regulations pertaining to the ownership of inventions made with federal funding, the licensing of inventions owned by the federal government, and the ownership of inventions made by federal employees under the Bayh-Dole Act (Authority: [35 U.S.C. §§ 200-209](#), [37 CFR 401.14\(c\)\(1\)](#)). Agencies are now required to transition all unclassified subject invention reporting to [iEdison](#) no later than December 31, 2025. Grant and cooperative agreement recipients will be required to report in iEdison, while NASA civil servants will continue to submit subject invention reports in the NASA New Technology Reporting (e-NTR) System.

Additionally, to streamline reporting and reduce agency and recipient burden, the NASA Technology Transfer Office has removed two reporting requirements for award recipients – 1) the Interim New Technology Summary Report and 2) the Final New Technology Summary Report.

Details of the changes are in the Guidance section as noted below.

GUIDANCE:

SUBAWARD REPORTING

Transition from FSRS.gov to SAM.gov

NASA's policy reflecting the transition from the FSRS.gov to SAM.gov has necessitated further modification of language included in the FY25 GCAM and GCAT. Please refer to Appendix A of this GIC for a summary of changes to each section.

Changes to the FY25 GCAM effectuated with this GIC:

1.0 Acronyms & Abbreviations

Removed:

FSRS - FFATA Subaward Reporting System

29.0 Post-award Reporting Requirements

Paragraph has been revised to read:

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, FFATA or Transparency Act Executive Compensation Reporting, 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.

29.4 FFATA Reporting Requirements

First paragraph has been revised to read:

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 [SAM.gov](#). 2 CFR 170 provides detailed guidance as to what information needs to be reported in these systems and the deadlines for submitting this information. Subaward and executive compensation information that is reported to SAM.gov is ultimately transferred to USAspending.gov for public display.

Appendix C – Post-award Reporting and Certification Requirements

Acronyms used in this section:

Removed:

FSRS - FFATA Subaward Reporting System

Added:

SAM.gov System for Award Management

Changes as follows:

Page 127 | Row 4, “Report Due/Frequency” revised to read:

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
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> <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>	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>General Terms and Conditions, section 4.10</i>) Submit reports to: SAM.gov	GO

Page 128 | Row 1, “Report Due/Frequency”

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
FFATA or Transparency Act Executive Compensation Reporting Required for all grants and cooperative agreement recipients and subrecipients that meet the following criteria: i. The total Federal funding authorized to date under a Federal award equals or exceeds \$30,000 as defined in 2 CFR § 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,	<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. <u>Subrecipients</u> – Report to the recipient by the end of the month following the month during which you make the subaward. See example in the row above. (Ref. <i>General Terms and Conditions, section 4.10</i>) Submit reports to: SAM.gov	GO (For prime awards only)

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) 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.		
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Changes to the FY25 GCAT effectuated with this GIC:

Section 4. Compliance and Reporting

Paragraph(s) have been revised to read:

4.8 Reporting Subawards and Executive Compensation

1. Reporting of first-tier subawards.

b. Reporting Requirements.

- i. The entity or Federal agency must report each subaward described in paragraph a.1. of this award term to the System for Award Management (SAM) at <https://sam.gov/>

3. Reporting of Total Compensation of Subrecipient Executives

- b. *Reporting Requirements.* The subrecipient must report to the recipient their executive total compensation described in paragraph c.1. of this award term. The recipient is required to submit this information to the System for Award Management (SAM) at <https://sam.gov/> no later than the end of the month in which the subaward was issued. (For example, if the subaward was issued on November 7, 2025, the subaward must be reported by no later than December 31, 2025).

NEW TECHNOLOGY REPORTING

Transition from e-NTR to iEdison.gov for NASA grant recipients and changes to reporting requirements.

NASA's policy reflecting the transition from [e-NTR](#) to [iEdison.gov](#) for grant recipient new technology and/or invention reporting has necessitated further modification of language in the FY25 GCAM and GCAT. New iEdison training webinars (basic training, parts I & II and utilization-specific training) are posted at <https://www.nist.gov/iedison/training-opportunities>. Please refer to Appendix A for a summary of changes to each section and Appendix B for a list of policies that have been rescinded.

Changes to the FY25 GCAM effectuated with this GIC:

Contents

Section Title has been revised to read:

29.3 - New Technology Reporting

1.0 Acronyms & Abbreviations

Added:

iEdison - interagency Edison database

1.1 Definitions

Added:

Reportable Item: Reportable item means any invention, discovery, improvement, or innovation of the recipient, whether or not patentable or otherwise protectable under Title 35 of the United States Code, made in the performance of any work under any NASA award or in the performance of any work that is reimbursable under any clause in any NASA award providing for reimbursement of costs incurred before the effective date of the award. Reportable items include, but are not limited to, new processes, machines, manufactures, and compositions of matter, and improvements to, or new applications of, existing processes, machines, manufactures, and compositions of matter. Reportable items also include new computer programs, and improvements to, or new applications of, existing computer programs, whether or not copyrightable or otherwise protectible under Title 17 of the United States Code.

29.3 New Technology Reports (NTR)

Section title changed. Paragraphs 1 and 2 revised to read:

Recipients shall disclose in writing each subject invention or reportable item to NASA via [iEdison](#), an online database maintained by the National Institute of Standards and Technology (NIST), in accordance with the terms and conditions of their award. Nonprofits and small business firms shall adhere to reporting requirements in term and condition 3.1, Patent Rights, and commercial firms that are not small businesses shall adhere to term and condition 3.3, New Technology. Information on registering for iEdison, user guides, video tutorials, and other resources can be found on the iEdison website. A comprehensive list

of post-award reporting requirements, including patent and invention reporting requirements, can be found in Append C, Post-award Reporting and Certification Requirements, of this Manual.

Appendix C – Post-award Reporting and Certification Requirements

Acronyms used in this section:

Added:

iEdison - interagency Edison database

TTO - Technology Transfer Office

Revised to read:

NTR - New Technology Report

Changes as follows:

Page 126 | Row 3, “Report Due/Frequency” *revised to read:*

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Disclosure of Inventions and New Technology <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i>	Within 2 months after inventor discloses it to recipient. (Ref. <i>General Terms and Conditions</i>, sections 3.1, and 3.3) See iEdison NIST and sections 3.1 and 3.3 of the <i>General Terms and Conditions</i> for submission instructions.	TTO

Page 126 | Row 4, “Report Due/Frequency” *revised to read:*

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Election of Title to a Subject Invention <i>(Required for all grants and cooperative agreements)</i>	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. <i>General Terms and Conditions</i>, sections 3.1 and 3.3) See iEdison NIST and sections 3.1 and 3.3 of the <i>General Terms and Conditions</i> for submission instructions.	TTO

Page 127 | Row 2, “Report Due/Frequency” *revised to read:*

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Notification of Decision to Forego Patent Protection <i>(Required for all grants and cooperative agreements)</i>	As applicable, not less than 30 days before the expiration of the response period required by the relevant patent office. <i>(Ref. General Terms and Conditions, sections 3.1 and 3.3)</i> See iEdison NIST and sections 3.1 and 3.3 of the General Terms and Conditions for submission instructions.	TTO

Page 127 | Row 3, “Report Due/Frequency” *revised to read:*

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Utilization of Subject Invention/Reportable Items <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i>	Every 12 months from the date a subject invention is elected. Note: Negative reports are required. <i>(Ref. General Terms and Conditions, sections 3.1 and 3.3)</i> See iEdison NIST and sections 3.1 and 3.3 of the General Terms and Conditions for submission instructions.	TTO

Changes to the FY25 GCAT effectuated with this GIC:

Section 3. Intellectual Property and Data Rights

3.1 Patent Rights (Applicable to Non-Profits and Small Business Firms ONLY)

Section (b)(i) revised to read:

(b.) The below items are added to the end of paragraph (c) of 37 CFR § 401.14 are as follows:

- i. The Grant recipient or its representatives shall complete, execute and submit electronically each reportable item to NASA via the iEdison Invention Information Management System maintained by the National Institute of Standards & Technology (NIST). Information on accessing the iEdison system can be found at <https://www.nist.gov/iedison>.

Section (e)(i) revised to read:

e. The following constitutes paragraph “(l)” in 37 CFR § 404.14.

- i. All required communications under 37 CFR § 404.14 shall be submitted electronically via the iEdison Invention Information Management System maintained by the National Institute of Standards & Technology (NIST). iEdison allows contractors, grantees, and other recipients of federal funding to comply with the reporting requirements of the Bayh-Dole Act. For

additional information on the rights and obligations provided by the Bayh-Dole Act, please refer to the Bayh-Dole statute (35 U.S. Code Chapter 18 - Patent Rights in Inventions Made With Federal Assistance) and its implementing regulations (37 CFR Part 401- Rights To Inventions Made By Nonprofit Organizations And Small Business Firms Under Government Grants, Contracts, And Cooperative Agreements).

3.3 New Technology (Applicable to Commercial Firms That Are Not Small Businesses)

Paragraphs 5(a)(b)(c) have been revised to read:

5. Invention identification, disclosures, and reports.

- a. The recipient shall establish and maintain active and effective procedures to assure that reportable items are promptly identified and disclosed to recipient personnel responsible for the administration of this New Technology term and condition within six months of conception and/or first actual reduction to practice, whichever occurs first in the performance of work under this award. These procedures shall include the maintenance of laboratory notebooks or equivalent records and other records as are reasonably necessary to document the conception and/or the first actual reduction to practice of the reportable items, and records that show that the procedures for identifying and disclosing reportable items are followed. Upon request, the recipient shall furnish the Grant Officer a description of such procedures for evaluation and for determination as to their effectiveness.

Grantees or its representatives shall electronically submit each reportable item to NASA via the iEdison Invention Information Management System within two months after the inventor discloses it in writing to Contractor personnel responsible for the administration of this New Technology—Other Than a Small Business Firm or Nonprofit Organization clause or within six months after the Contractor becomes aware that a reportable item has been made, whichever is earlier, but in any event for subject inventions before any on sale, public use, or publication of such invention known to the Contractor. The disclosure to the agency shall identify the inventor(s) or innovator(s) and this contract under which the reportable item was made. It shall be sufficiently complete in technical detail to convey a clear understanding, to the extent known at the time of the disclosure, of the nature, purpose, operation, and physical, chemical, biological, or electrical characteristics of the reportable item. The disclosure shall also identify any publication, sale or offer for sale, or public use of any subject invention and whether a manuscript describing such invention has been submitted for publication and, if so, whether it has been accepted for publication at the time of disclosure. In addition, after disclosure to the agency, the Contractor will promptly notify the agency of the acceptance of any manuscript describing a subject invention for publication or of any sale, offer for sale, or public use planned by the Contractor for such invention.

Section (b) revised to read:

- b. Any and all patent applications must be submitted electronically via the iEdison Invention Information Management System including a confirmation of a License to the United States Government and the page of a United States patent application that contains the Federal support clause within two months of filing any domestic or foreign patent application.

EFFECTIVE DATE: This GIC is effective as dated and shall remain in effect until canceled or superseded.

REGULATION OR TERM AND CONDITION CHANGES: Yes. The revised language of terms and conditions as identified in this GIC shall be incorporated into all new and modified grants and cooperative agreements awarded on or the effective date of this GIC. The new terms and conditions will also be incorporated into NASA policy manuals during the next update, expected October 2026.

SUPERSESSION: None.

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

[End]

Appendix A: Summary of Changes

The table below provides a summary of changes to Subaward Reporting and New Technology Reporting requirements across the GCAM and GCAT.

SUBAWARD REPORTING			
Manual	Section	Paragraph	Summary of Changes
GCAM	1.0	Acronyms & Abbreviations	Removed FFATA Subaward Reporting System (FSRS)
	29.0	1	Removed reference to FSRS.
	29.4	1	Removed reference to FSRS; replaced with SAM.
	Appendix C	Acronym list	Removed reference to FFATA Subaward Reporting System (FSRS). Added new reference to the System for Award Management (SAM).
		Reports table	Page 127, Row 4 – FFATA or Transparency Act Executive Compensation Reporting. Changed references from FSRS to SAM.
			Page 128, Row 1 – FFATA or Transparency Act) Subaward Reporting. Changed references from FSRS to SAM.
GCAT	4.10	1(b)(i.)	Removed reference to FFATA Subaward Reporting System (FSRS). Added new reference to the System for Award Management (SAM).
		3(b)	Removed reference to FSRS; replaced with SAM.

NEW TECHNOLOGY REPORTING			
Manual	Section	Paragraph	Summary of Changes
GCAM	1.0	Acronyms & Abbreviations	Added Interagency Edison database (iEdison)
	29.3	1	Removed references to e-NTR for grant recipients. Removed references to 1) the Interim New Technology Summary Report <u>and</u> 2) the Final New Technology Summary Report. Award; reporting requirement has been rescinded.
	Appendix C	Acronym list	Added Interagency Edison database (iEdison). Removed references to NASA's New Technology Reporting system (e-NTR).
		Reports table	Page 126, Row 3 – Disclosure of Inventions and New Technology (NASA Form -1679). Changed reporting system reference from e-NTR to iEdison.
			Rescinded. Page 127, Row 1 – Interim New Technology Summary Report (NTSR)

			Rescinded. Page 130, Row 3 – Final New Technology Summary Report (NTSR).
GCAT	3.1	b(i.)	Edited. Patent rights (non-profits and small business firms) revised to reflect new instruction to use iEdison for reportable items.
	3.1	e(i.)	Edited. New instruction that all required communications under 37 CFR § 404.14 to now be submitted electronically using iEdison.
	3.3	5(a)(b)	Edited. Paragraph (a) revised to include new language from former paragraph (b) and removes references to yearly or annual report(s). New paragraph (b), re: confirmation of licenses.

Appendix B: Rescinded Policies

The following policies and requirements have been rescinded in their entirety from the GCAM.

NEW TECHNOLOGY REPORTING

Transition from e-NTR to iEdison.gov for NASA grant recipients and changes to reporting requirements.

Page 127 | Row 1.

REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Interim New Technology Summary Report (NTSR) <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i>	Every 12 months from the grant/cooperative agreement's POP start date. (Note: Negative reports are required.) <i>(Ref. General Terms and Conditions, sections 3.1, 3.3, and 3.4)</i> See e-NTR and section 3.4 of the General Terms and Conditions for submission instructions.	

Page 130 | Row 3. *Rescinded in its entirety.*

FINAL REPORTS	REPORT DUE/FREQUENCY	NASA REVIEWERS
Final New Technology Summary Report (NTSR) <i>(Required for all grants and cooperative agreements, except for those issued solely to support education programs.)</i>	Within 120 days after the expiration date of the grant/cooperative agreement. (Note: Negative reports are required.) <i>(Ref. General Terms and Conditions, sections 3.1, 3.3, and 3.4)</i> See e-NTR and section 3.4 of the General Terms and Conditions for submission instructions.	

The following policies and requirements have been rescinded in their entirety from the GCAT.

Section 3. Intellectual Property and Data Rights

Section 3.1 (b)(ii) rescinded in its entirety:

- ii. "In addition to the above, the recipient shall provide the New Technology Representative, as designated under section 3.4, Designation of New Technology Representative and Patent Representative, of these terms and conditions, the following:
 - A. A yearly interim new technology summary report listing any subject inventions required to be disclosed during the preceding year (or a statement certifying there were none).
 - B. A final new technology summary report listing all subject inventions (or a

statement certifying there were none) for the entire award period; which report shall be submitted within 120 days after the end date for the period of performance within the designated system noted within the award document.”

3.3 New Technology (Applicable to Commercial Firms That Are Not Small Businesses)

Section 5 (c)(ii)(iii)

- c. The recipient shall furnish the New Technology Representative, with notice to the Grants Officer, the following:
 - ii. Interim new technology summary reports every 12 months from the date of the award, listing reportable items during that period, and certifying that all reportable items have been disclosed (or that there are no such inventions) and that the procedures required by paragraph (e)(1) of this term and condition have been followed.
 - iii. A final new technology summary report within 120 days after the end of the period of performance, listing all reportable items or certifying that there were no such reportable items, and listing all research subawardees/subcontractors at any tier containing a patent rights clause or certifying that there were no such subcontractors.

3.4 Designation of New Technology Representative and Patent Representative

1. For the administration of the term and condition entitled “New Technology,” or “Patent Rights” whichever is included, the designated representatives, whose emails are listed on the Points of Contact list, will oversee these terms and conditions.
2. Reports of reportable items, and disclosure of subject inventions, interim reports, final reports, utilization reports, and other reports required by the term and condition, as well as any correspondence with respect to such matters, should be directed to the New Technology Representative, with notification to the Grant Officer, unless transmitted in response to correspondence or request from the Patent Representative. Inquires or requests regarding disposition of rights, election of rights, or related matters should be directed to the Patent Representative. This term and condition shall be included in any subaward/subcontract hereunder requiring a “New Technology” term and condition or “Patent Rights - Retention by the Contractor (Short Form)” term and condition unless otherwise authorized or directed by the Grant Officer. The respective responsibilities and authorities of the above-named representatives are set forth in the NASA Grant and Cooperative Agreement Manual.