National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular

GIC 26-01
01/14/2026

Revisions to NASA Grant and Cooperative Agreement Terms and Conditions Implementing Executive Order 14332

PURPOSE: The purpose of this Grant Information Circular (GIC) is to inform NASA grant and cooperative agreement applicants and recipients of revisions to NASA's grants and Cooperative Agreement Terms and Conditions (GCAT) to implement requirements in Executive Order (E.O.) 14332 "Improving Oversight of Federal Grantmaking".

BACKGROUND: E.O. 14332 directs Federal agencies to review and, as appropriate, revise their policies, regulations, and award terms and conditions governing discretionary financial assistance. The Order emphasizes enhanced agency discretion in administering awards, including strengthened authorities related to award termination and increased controls over the use and drawdown of grant funds.

Section 6 of the E.O. addresses implementation and termination requirements for discretionary grants and cooperative agreements.

Section 6(b) addresses **termination** and directs agency heads, to the maximum extent permitted by laws and consistent with applicable Executive Orders and Presidential directives to revise existing grant terms and conditions to permit immediate termination for convenience – or to clarify that such termination is permitted – including in circumstances where an award no longer advances agency priorities or the national interest.

Section 6(c) addresses **payment requests and drawdowns** and directs agencies, to the extent practicable consistent with applicable, law, to include terms and conditions in discretionary grants that prohibit recipients from drawing down general grant funds for specific projects without the affirmative agency authorization and that require recipients to provide written explanations or supporting documentation, with specificity, for each payment drawdown request.

In response to these requirements, NASA has revised the Grant and Cooperative Agreement Terms and Conditions (GCAT) to ensure compliance with E.O. 14332.

Summary of GCAT Revisions: NASA has revised the GCAT as follows:

Section 1.9 – Termination and Enforcement

2. The award may be suspended or terminated in part or in its entirety as follows:
    b. By NASA, to the extent authorized by law, if an award no longer effectuates the program goals or agency priorities, or, in the case of foreign assistance awards, the national interest.

c. By NASA, for its convenience, when it determines that termination is in the best interest of the Government.

e. By the recipient upon sending NASA a written notification of the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if NASA determines in the case of partial termination that the reduced or modified portion of the award will not accomplish the purposes for which the award was made, NASA may terminate the award in its entirety.

Section 2.1 – Financial Management

1. **Payment Requests and Drawdowns**: Recipients are prohibited, to the extent practicable and consistent with applicable law, from directly drawing down general grant funds for specific projects without the affirmative authorization of NASA. All NASA grant and cooperative agreement recipients shall provide a written justification at the subaccount level for each payment request. The justifications shall include:

   a) The amount of funding being requested.

   b) The budget cost category to which the request relates; and

   c) An explanation of why the payment is required.

Note: Recipients must use the budget categories form their NASA award's most recently approved budget (e.g.," Personnel," "Fringe Benefits," "Equipment" etc.).

EFFECTIVE DATE: The revisions are effective upon issuance of this GIC.

REGULATION OR TERM AND CONDITION CHANGES: Yes.

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