



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Notice

GN 24-02
October 1, 2024

NASA's Implementation of Title 2 of the Code of Federal Regulations

PURPOSE: To inform NASA personnel and grant and cooperative agreement applicants and recipients that NASA has released updated regulations, policies, terms and conditions (T&Cs), resource documents, and forms to effectuate the Office of Management and Budget's (OMB) 2024 revisions to Title 2 of the Code of Federal Regulations ([2 CFR](#)), "OMB Guidance for Federal Financial Assistance."

BACKGROUND: In April 2024, OMB released [revisions](#) to 2 CFR to clarify policy, reduce agency and recipient burden, incorporate certain statutory requirements, and make plain language improvements. NASA has adopted OMB's 2024 2 CFR revisions by updating the Agency's grant regulations at [2 CFR part 1800](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. 2 CFR 1800 adopts 2 CFR in full and provides minor supplemental guidance, such as that pertaining to the applicability of 2 CFR, pre-award costs, and property administration. These revisions to 2 CFR will be applied to all new and amended NASA grants and cooperative agreements issued on or after **October 1, 2024**, regardless of when a proposal was submitted to NASA.

GUIDANCE: To effectuate the revisions to 2 CFR and other policy requirements, NASA has published new and updated guidance documents, T&Cs, forms, and resource documents as follows.

Updated Guidance and Forms

The guidance documents and forms described below are effective on October 1, 2024, and, with the exception of the *NASA Grant and Cooperative Agreement Procedures*, the documents can be found on NASA's Grants Policy and Compliance (GPC) Regulations and Guidance [webpage](#).

- ***NASA Grant and Cooperative Agreement Manual (GCAM): NASA's grant manual for proposers and recipients:*** The 2024 version of the GCAM reflects a significant restructuring of the document to streamline guidance, improve flow, and clarify policy. The revised GCAM now provides a single source for comprehensive grant guidance that covers the pre-award, award, post-award, and closeout phases of the grant life cycle. The 2024 GCAM has been revised to fully incorporate guidance previously found in the *NASA Proposer's Guide*, which will no longer be utilized after October 1, 2024. All guidance in

the *Proposer's Guide* can now be found in the GCAM at Chapter 1, Pre-award. Appendix A of this Grant Notice (GN) summarizes all major revisions to the 2024 GCAM.

- ***NASA Grant and Cooperative Agreement Procedures (GCAP): Proposal and grant administration guidance for NASA staff:*** To streamline guidance for the public, NASA has removed all instructional information in the GCAM that is intended solely for NASA personnel and placed that language into a new, internal document for NASA, the GCAP. This document will serve as NASA's internal standard procedures for all phases of the grant life cycle. By separating guidance for NASA personnel from that for grant applicants and recipients, the GCAM is now easier to navigate and only includes information that is relevant to the public.
- **General and special terms and conditions:** NASA's grant and cooperative agreement T&Cs were previously included in the GCAM as an appendix. Effective October 1, 2024, NASA has removed the T&Cs from the GCAM, and they will exist as a standalone document. This will facilitate easier navigation to the T&Cs and allow NASA to archive expired T&Cs more effectively in the future. The T&C document contains general terms that will apply to all NASA grants and cooperative agreements as well as special terms that may apply to awards based on the nature of the project. Appendix B of this GN summarizes all major revisions to the general and special T&Cs.
- **Common disclosure forms:** In support of requirements in National Security Presidential Memorandum-33 ([NSPM-33](#)) and the [CHIPS and Science Act](#), NASA has adopted common biographical sketch and current and pending (other) support forms. Effective October 1, 2024, all covered individuals, as defined in the NASA's biosketch and current and pending support policy in the 2024 GCAM, will be required to submit the disclosure forms with their applications. The [NASA Pre-award and Post-award Disclosure Requirements](#) document informs applicants of the activities that need to be disclosed, in which document the activity is to be disclosed, and whether post-award disclosures are required.

Updated Resource Documents

To support applicants and recipients as they manage grants and cooperative agreements, NASA has updated the following resource documents which are available on the GPC Resources and Training [webpage](#).

- **Introduction to the GCAM:** This document provides an overview of the GCAM's purpose, contents, and how it should be used. This document may be especially useful for those using the GCAM for the first time.
- **Navigating 2 CFR 200:** This document introduces 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and includes a description of each of the six subparts found in the guidance.

- **NASA Grant and Cooperative Agreement Life Cycle:** This resource describes the primary activities that NASA personnel and award applicants and recipients perform throughout the four phases of the grant life cycle: pre-award, award, post-award, and closeout.
- **Award Mechanisms at NASA:** Grants, cooperative agreements, and contracts have distinct purposes. This document defines these three funding mechanisms and provides helpful tips on how financial assistance awards (i.e., grants and cooperative agreements) differ from procurement contracts.

EFFECTIVE DATE: October 1, 2024

REGULATION OR TERM AND CONDITION CHANGES: Yes. 2 CFR 1800, the GCAM, and NASA's T&Cs have been revised. See above for more information.

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 – Major Revisions to the 2024 NASA Grant and Cooperative Agreement Manual (GCAM)

GCAM Section Number & Title	Revision Description
Title page	The title of the <i>Grant and Cooperative Agreement Manual</i> has been revised to <i>NASA Grant and Cooperative Agreement Manual</i> .
Foreword	A new foreword describing NASA and its grant funding organizations has been added to the beginning of the GCAM.
Various	Terminology that OMB updated in 2 CFR has also been updated in the GCAM, where applicable (e.g., “Non-federal entity” is now “recipient” or “subrecipient”, “SAM” is now “SAM.gov”, etc.).
Various	Policies previously released in Grant Information Circular (GIC) 23-02, Recipient Integrity and Performance Matters; GIC 23-06, Updates to the GCAM – FAPIIS; GIC 23-06B, FCTR to FFR Transition; GIC 23-07, Conflict of Interest Policy; and GIC 24-01, Federal Property Delegation; have been incorporated into the GCAM, where applicable.
Ch. 1, Pre-award	All information related to the pre-award phase of the grant life cycle that was previously found in the <i>NASA Proposer’s Guide</i> has been integrated into GCAM, Chapter 1, Pre-award.
Sec. 1.1, Definitions	New definitions for the following terms have been added to the GCAM: “Applicant,” “Application,” Authorized Organizational Representative,” Federal Award Date,” “Malign Foreign Talent Recruitment Program (MFTRP),” “Participant,” “Participant Support Cost,” and “Pass-through Entity.”
Sec. 2.0, Purpose	A description of the writing conventions used throughout the GCAM has been added.
Sec. 2.2, Order of Precedence for Federal Financial Assistance Regulations and Policy	The GCAM has been updated with a new order of precedence section that describes which regulations and policies take precedence in the event of a discrepancy or inconsistency.
Sec. 4.0, Limitations	Clarified that the NASA Jet Propulsion Laboratory (JPL) may not receive a NASA grant or cooperative agreement or receive a subaward from a NASA grant or cooperative agreement recipient.
Sec. 7.0, Overview of Systems	NASA has clarified that Grants.gov may be an option for submitting proposals, if specified in a Notice of Funding Opportunity (NOFO).

Sec. 9.4, Proposals Involving Non-U.S. Organizations	Language regarding restrictions on bilateral coordination with China has been revised to clarify that China or a Chinese-owned company may participate on a NASA award if NASA has notified the award recipient that the Agency has sought a waiver for such activities pursuant to Pub. L. 118-42, sec. 526.
Sec. 10.0, Developing an Application	Clarified that applicants may be required to submit a NASA Form (NF) 1206, Assurance of Compliance with the NASA Regulations Pursuant to Nondiscrimination in Federally Assisted Programs, during the application process.
Sec. 10.1, Proposal Cover Page	Revised guidance to clarify that the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) cover page is automatically generated by information than an applicant enters into the system.
Sec. 10.5, Biographical Sketches	A new biographical sketch section has been added pursuant to requirements in NSPM-33 .
Sec. 10.6, Current and Pending (Other) Support	A new current and pending (other) support section has been add pursuant to requirements in NSPM-33.
Sec. 10.9, Facilities, Equipment, and Other Resources	Guidance that describes requirements for requesting facilities, equipment, and other resources in a proposal has been updated to reflect in-kind contribution disclosure requirements per NSPM-33.
Sec. 16.10, Proposal Involving Improvements to Private Property	Added language regarding the process for requesting waivers to the Buy America Preference under infrastructure awards.
Sec. 16.3, Flight Activities	Language has been added stating that proposals that include flight activities (not regular passenger travel) may be subject to additional monitoring and oversight.
Sec. 16.13.2, Assurance of Compliance with the NASA Regulation Pursuant to Nondiscrimination in Federally Assisted Programs	A new section has been added describing the requirement to submit a NF 1206 at application and every three years thereafter.
Sec. 16.4, Freedom of Information Act (FOIA)	A new section has been added that describes NASA's FOIA policy regarding grant documents.

16.14, Preventing Grant Fraud	A new section on preventing grant fraud has been added. The section contains helpful information on reporting fraud, waste, and abuse to the NASA Office of Inspector General (OIG).
16.16, Malign Foreign Talent Recruitment Programs	A new section describing NASA's MFTRP policy has been added pursuant to requirements in the CHIPS and Science Act .
22.0, Indirect Costs	Revised language to clarify that there is no universal rule for classifying certain costs as direct or indirect costs. However, 2 CFR 200 requires certain costs to only be charged to an award as direct or indirect.
25.0, Award with Government Furnished and Award-funded Property	Added language to clarify how property reports (NF 1018, NASA Property in the Custody of Award Recipients) are submitted and how access to the NASA Electronic Submission System (NESS) can be obtained.
29.1, Performance Report Requirements	Clarified that performance reports are due 60 days before the anniversary of an award's <i>period of performance (POP) start date</i> . Previous GCAM language said 60-days prior to an award's anniversary, which could have been interpreted to mean POP start date or award date.
29.1.1, Information Contained in a Performance Report	Removed the requirement that recipients sign their annual performance reports. Additionally, the "Products" and "Participants & Other Collaborating Organizations" reporting categories in the Research Performance Progress Report (RPPR) are now mandatory. Lastly, added language regarding 2 CFR 200's requirement that recipients report "significant developments."
29.7, Conflict of Interest Policy and Disclosure Requirements	Revised the conflict of interest policy to clarify that it applies to all awards, not just those for research. Also clarified that this policy does not apply to NASA civil servants.
29.8, Post-award Current and Pending (Other) Support Disclosures	Added a new section describing when and how post-award current and pending (other) support disclosures must be submitted.
29.9, Mandatory Disclosure of Credible Evidence of Criminal Law Violations	Per 2 CFR § 200.113 , new language has been added regarding the disclosure of credible evidence of criminal law violations.
30.0, Methods of Procurement	Guidance on methods of procurement has been expanded to include a description of key procurement standards found in 2 CFR 200.

31.0, Change of Principal Investigator or Recipient Institution	Added a new section describing Principal Investigator (PI) transfer requirements. PI transfers are now prohibited if the PI has left the relinquishing institution prior to the request being submitted to NASA, and PI transfers will not be processed if received within the last 90 days of an award's POP.
32.0, Administrative Changes and Supplements	Added language mandating the use of the NASA Shared Services Center's no-cost extension (NCE) request form. Additionally, deadlines for NCEs have been clarified. The first, recipient-initiated NCE is due at least 10 calendar days before an award's POP expires. Subsequent NCE requests must be submitted at least 45 calendar days before POP expiration. However, if a subsequent NCE request will cause an award to exceed \$5 million <i>and</i> a five-year POP, then that NCE request must be submitted to NASA at least 90 calendar days before POP expiration. A NASA Grant Officer may consider NCE requests submitted after these deadlines on a case-by-case basis and with sufficient justification from the recipient.
34.0, Remedies for Noncompliance	A new section describing remedies for noncompliance and actions that NASA may take if recipients fail to disclose required information has been added to the GCAM.
37.0, Closeout Responsibilities	<p>Added language stating that if a recipient does not have a final indirect cost rate, they must still submit a final Federal Financial Report (FFR) during the 120-day closeout period. When the indirect rate is finalized, the recipient must submit a revised final FFR.</p> <p>Clarified that if a recipient cannot meet the requirement to liquidate all financial obligations incurred under a NASA award no later than 120 days of an award's POP expires, then that recipient must request an extension to the 120-day liquidation requirement.</p> <p>Per 2 CFR § 200.403, recipients are now permitted to incur administrative closeout costs during the 120-day closeout period. NASA has clarified that despite this allowance, recipients are still responsible for also liquidating all financial obligations and submitting final reports within the 120-day closeout period.</p> <p>Added language pertaining to agencies' authorization to mutually agree with recipients to closeout awards using the current or most recently negotiated indirect cost rate.</p> <p>Revised NASA's closeout policy to require unilateral closeout within 245 days, rather than 270 days, of POP expiration if a recipient has not complied with their award's T&Cs.</p>

Sec. 38.0, Single Audit Requirements, and sec. 38.1, Responsibilities for Single Audits	New sections pertaining to single audit requirements and responsibilities have been added to the GCAM. The threshold for single audits has increased from \$750,000 to \$1 million per 2 CFR § 200.501 , and NASA has provided a point of contact for single audit report extension requests.
Appendix A, Certifications, Assurances, and Representations	NASA's certifications, assurances, and representations have been updated to include new certifications related to trafficking in persons, disclosure requirements in the 2021 National Defense Authorization Act, and MFTRPs per the CHIPS and Science Act. Revisions also clarify that certifications will be collected at proposal submission as well as annually if an entity receives an award.
Appendix C, Post-award Reporting and Certification Requirements	Updated the post-award reporting requirements table in GCAM, Appendix C, to reflect reporting requirements that were not previously communicated in this section. These requirements include the SF-LLL, annual certifications and representations, the NF 1206, and reporting requirements related to recipient integrity and performance matters per 2 CFR 200, Appendix XII . The table also clarifies that all award recipients that are required to submit an annual property inventory report must now use the NF 1018, NASA Property in the Custody of Award Recipients, and recipients may not submit an inventory report in the format of their choosing.

Appendix B – Major Revisions to the NASA General & Special Terms and Conditions (T&Cs)

T&C Chapter, Section Number, and Title	Revision Description
Table of Contents	The T&Cs now contain a table of contents that includes hyperlinks to sections throughout the document.
Introduction	An introduction has been added that describes the purpose and applicability of the T&Cs.
Various	Terminology that OMB updated in 2 CFR has also been updated in the T&Cs, where applicable (e.g., “Non-federal entity” is now “recipient” or “subrecipient”, “SAM” is now “SAM.gov”, etc.).
Various	Policies previously released in GIC 23-02, Recipient Integrity and Performance Matters; GIC 23-06, Updates to the GCAM – FAPIIS; GIC 23-06B, FCTR to FFR Transition; GIC 23-07, Conflict of Interest Policy; and GIC 24-01, Federal Property Delegation; have been incorporated into the T&Cs, where applicable.
Ch. 1, sec. 1.1, Compliance Requirements and Order of Precedence	<p>Added language to the T&Cs clarifying that NOFO requirements "flow down" to the award.</p> <p>The order of precedence language has been updated to clarify which regulations and policies take precedence in the event of a discrepancy or inconsistency between an award’s T&Cs and other requirements.</p> <p>Language describing the applicability of 2 CFR 1880, Nonprocurement Debarment and Suspension, and 2 CFR 1882, Requirements for a Drug-free Workplace, has been added.</p>
Ch. 1, sec. 1.2, System for Award Management and Unique Entity Identifier	OMB has made plain language edits to 2 CFR 25 Appendix A, which pertains to SAM.gov requirements. GPC updated the T&Cs to reflect these revisions accordingly.
Ch. 1, sec. 1.8, Extensions	Deadlines for NCEs have been clarified. The first, recipient-initiated NCE is due at least 10 calendar days before an award’s POP expires. Subsequent NCE requests must be submitted at least 45 calendar days before POP expiration. However, if a subsequent NCE request will cause an award to exceed \$5 million <i>and</i> a five-year POP, then that NCE request must be submitted to NASA at least 90 calendar days before POP expiration.

Ch. 1.9, Termination and Enforcement	Language has been added that explicitly states that NASA may suspend or terminate an award if that award no longer effectuates a NASA program's goals or Agency priorities.
Ch. 1, sec. 2.1, Financial Management	Added language stating that if a recipient does not have a final indirect cost rate, they must still submit a FFR during the 120-day closeout period. When the indirect rate is finalized, the recipient must submit a revised final FFR.
Ch. 1, sec. 2.5, Equipment and Other Property, and 2.6, Equipment and Other Property Under Awards with For-Profit Organizations	<p>Clarified that for those recipients that are required to submit annual property reports, the property reports must be submitted in NESS no later than October 31, rather than October 15, of each year. Negative property reports are no longer required.</p> <p>Clarified that final property reports must be submitted within 120 days of a POP's expiration, rather than within 60 days of POP expiration.</p> <p>The threshold for equipment has increased from \$5,000 to \$10,000 per guidance in 2 CFR 200.</p> <p>Language has been added to T&C 2.6 to clarify that for-profit entities may retain title to equipment acquired with NASA award funds with no further obligation to NASA.</p>
Ch. 1, sec. 4.5, Trafficking in Persons	A new T&C regarding trafficking in persons has been added pursuant to requirements in 2 CFR 175 , Appendix A.
Ch. 1, sec. 4.8, Reporting Matters Related to Recipient Integrity and Performance	OMB made plain language revisions to the T&C in 2 CFR 200, Appendix XII . NASA has updated sec. 4.8 to align with OMB's revisions.
Ch. 1, sec. 4.10, Reporting Subawards and Executive Compensation	OMB has made plain language edits to the T&Cs in 2 CFR 170 , Appendix A. NASA updated sec. 4.10 to reflect these revisions accordingly.
Ch. 1, sec. 5.4, Never Contract with the Enemy	OMB has made plain language edits to 2 CFR 183 . NASA updated sec. 5.4 to reflect these revisions accordingly.
Ch. 1, sec. 5.10, Protecting and Preserving the Historic and Scientific Value of U.S. Government Lunar Artifacts	Clarified that the T&C on protecting and preserving lunar artifacts only applies to for-profit entities.

Ch. 2, Special Terms and Conditions	A new section for special T&Cs, or those that only apply to certain awards based on the nature of activities being performed, has been developed.
Ch. 2, sec. 5, Animal Research Policy and Procedures	A new special T&C has been added that pertains to the care and use of animals in NASA activities.
Ch. 2, sec. 6, Human Research Policy and Procedures	A new special T&C has been added that pertains to the protection of human research subjects.
Ch. 3, Program Specific Terms and Conditions	A new section has been developed that describes program-specific T&Cs, which are those developed by a NASA funding organization. Program-specific T&Cs may include unique reporting requirements, restrictions on allowable costs, performance metrics, and other compliance or monitoring requirements.