



National Aeronautics and
Space Administration
Washington, DC 20546

Grant Information Circular

GIC 22-02

November 30, 2021

PURPOSE: The purpose of this Grant Information Circular (GIC) is to inform NASA programs, Grant Officers (GO), and Technical Officers (TO) that the Grant Policy and Compliance Branch (GPC) has issued a revised version of the NASA Grant and Cooperative Agreement Manual (GCAM).

BACKGROUND: The GCAM is NASA's definitive policy guide for the implementation of government-wide and NASA-specific regulations for awarding and administering grants and cooperative agreements. The GCAM clarifies award roles, responsibilities, and requirements; provides a centralized location for award resources; and delivers a concise and practical guide for the NASA grant community in the administration of grants and cooperative agreements.

The 2021 GCAM includes policy revisions made in response to NASA Office of Inspector General (OIG) findings, recommended edits from across the NASA grants community, and the incorporation of GICs that were issued after the release of the 2020 GCAM. The revised GCAM will apply to all new awards and modified awards issued on or after the publication of this GIC, with the exception of GCAM Appendix H, NASA's Routine Monitoring Plan. The requirements in Appendix H will become effective for all new and existing awards on January 2, 2022. The revised GCAM will be made publicly available on the Grants Policy and Compliance Branch [website](#).

EFFECTIVE DATE: This GIC and the revised GCAM are effective upon publication except for GCAM Appendix H, NASA's Routine Monitoring Plan. The requirements in Appendix H will become effective on January 2, 2022.

REGULATION OR TERM AND CONDITION CHANGES: NASA's standard terms and conditions have been modified. See Appendix A, 2021 GCAM Revisions Crosswalk, below for details.

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Appendix A: 2021 GCAM Revisions Crosswalk

Topic	Section	Description of Revisions and Edits
Award Lifecycle Phase Headings	N/A	The GCAM has been divided into sections that reflect the four phases of the award lifecycle: pre-award, award, post-award, and closeout.
Definitions Section	1.1	A new definitions section has been added.
Relationship between the GCAM and GICs	2.2	A new section describing what GICs are, their purpose, and where they can be found has been added. This new section will help ensure that people are consulting both the GCAM as well as any new policies that may have been released outside of the GCAM in the form of a GIC.
CAN Language	2.3	Removed language stating that Cooperative Agreement Notices (CANs) must always result in a cooperative agreement. This requirement unnecessarily limits NASA's ability to issue a grant should a proposal be submitted to a CAN that is better suited to a grant.
Technical Officer Eligibility Requirements	2.5	Language added to clarify that only NASA civil servants and Intergovernmental Personnel Act (IPA) participants may serve as TOs on grants and cooperative agreements.
UEIs and Dun & Bradstreet	5.3	Added language to the unique entity identifier (UEI) section noting that as of April 2022, Dun & Bradstreet will no longer provide UEIs. SAM.gov will provide the UEI starting on April 4, 2022.
NOFO Synopsis	5.7.1	Removed language that allows an exception to the notice of funding opportunity (NOFO) synopsis requirement. The exception stated that if a NOFO is for awards less than \$25K and for which 100 percent of eligible applicants live outside the U.S., a synopsis is not required.
Removed References to NPR 5810	5.7.2 & Appendix A	All references to NASA Procedural Requirements (NPR) 5810, Standard Format for NASA Research Announcement and Other Announcements for Grants and Cooperative Agreements, have been removed as this NPR will expire soon. All NOFO requirements can be found in GCAM Appendix A and 2 CFR 200.
NOFO Clearance Requirement	5.7.2	Removed requirement that NOFO appendices receive GPC concurrence prior to publication. Standalone NOFOs and omnibus NOFOs still require GPC approval prior to posting to NSPIRES and Grants.gov
Co-PI Language Change	5.7.2	There was one instance of "Co-PI" in the GCAM. This has been changed to "CoPI" to be consistent with upcoming changes to CoPI language in NSPIRES.

Evaluation Requirements	5.7.4	Updated 5.7.4.4 to include a reference and link to the unsolicited proposal evaluation form that is currently hosted on the NASA Shared Services Center (NSSC) website.
Evaluation Requirements	5.7.4	Deleted 5.7.4.9 as this language appears to be outdated. It references regulations that apply when printing proposals in excess of 25,000 pages.
Renewals	5.7.4	Paragraph 5.7.4.10 states that renewals of previously competed awards are considered competed, but 5.8.3.2 states that renewals will be justified as single source awards. Therefore, 5.7.4 and 5.8.3 are contradictory. Removed statement saying that renewals of previously competed awards are considered competed. Therefore, renewals must be treated as single source awards.
Electronic Submission	5.7.6	Updated to note that <i>all</i> proposals, not just those for discretionary awards, must be submitted electronically to NASA.
Unsolicited Proposal Evaluation and Justification Form	5.8.2	Updated section 5.8.2.5 to include a link to the NSSC's Technical Evaluation and Justification for Unsolicited Grant or Cooperative Agreement Action form that is hosted on their website.
Renewal Justifications	5.8.3	Removed sentence stating that "higher scrutiny for approval will apply when an effort is renewed more than once" as it is vague. Added language requiring the NSSC Supervisory Contract Specialist to review and approve non-competitive awards that are renewed more than once.
Required Notification of Non-selected Proposals	5.8.4	Created a new section to incorporate language from GIC 21-05, NASA Non-selection Letter Template.
\$5M/5 yr. Approval Rule	5.10	Language updated to note that OCFO approval is required for new awards that exceed the \$5M <i>and</i> 5 yr. thresholds. Also clarified that when funding is added to an existing award and that funding causes the award to exceed \$5M <i>and</i> 5 yrs., GPC approval is required.
Supplement and Augmentation Justification	5.10	Added language to implement corrective actions per OIG report IG-21-022, recommendation #2: "Require technical sponsoring offices to provide grant officers with a determination as to why requested extensions or augmentations, that will result in an agreement exceeding 5 years, are in the best interest of the government or otherwise specified by a program's unique needs, policies, or procedures."
Cost Sharing Language	5.11	Removed all cost share language from section 5.11 because cost share policy is covered in section 5.13.3
Award Approval Thresholds	5.11	Updated 5.11 to implement corrective actions per OIG report IG-21-022, recommendation #1: "Revise the GCAM to add criteria and review and approval thresholds beyond grant and technical officers for cooperative agreement extensions and augmentations."
Pre-award Cost Approval	5.13.1	Updated language to note that GO prior approval does not obligate NASA to cover pre-award costs in the event a grant is not issued.

Indirect Costs	5.13.2	Added language to clarify which costs are excluded from Modified Total Direct Costs (MTDC).
Post-award Monitoring	7.1 and 7.2	Post-award monitoring language in section 7.1 and 7.2 has been removed as it is now addressed in Appendix H, NASA's Routine Monitoring Plan
FFATA Reporting Requirements	7.4	Inserted Federal Funding Accountability and Transparency Act (FFATA) reporting requirements policy from GIC 21-04, 2 CFR 170 Subaward Reporting Requirements.
Applicability of NPR 2200	7.5	Updated language to explicitly state that NPR 2200.2D, Requirements for documentation, approval, and dissemination of scientific and technical information, is not applicable to NASA grant and cooperative agreement recipients unless specified in an award's terms and conditions.
Closeout Procedures	9.0	Updated record retention language to reference NPR 1441.1E and NASA Record Retention Schedules (NRRS) 1441.1. Also updated procedures to require the use of the Recipient Performance Validation Form.
NOFO Required Language	Appendix A	Throughout the NOFO template, there are "NASA requirements" that denote mandatory language for all NOFOs. However, many of these NASA requirements sections state that the language we have provided is "sample language." To prevent the "NASA requirements" language from being incorrectly modified, the phrase "sample language" has been removed and replaced with "Language required to be included in the NOFO."
DE&I language	Appendix A	Inserted language regarding NASA's commitment to diversity and inclusion into the NOFO template. See GIC 21-08, NOFO Checklist Update, for more information.
Clarification of Collection of STEM Information	Appendix A	NOFO template contains a section called "Collection of STEM information." This section has been renamed to "Collection of demographic information" as the information being collected is not STEM information but demographic information.
Buy America Encouragement	Appendix D18	Removed references to Public Law (PL) 106-391 and NASA authorization act of 2000 as these no longer apply. Now, this section only references 2 CFR 200.322, Domestic preference for procurement.
Invoices Under Awards to For-profits	Appendix D32	Revised D32 to remove requirement that for-profit organizations submit invoices for payments. For-profits will be paid in the same manner as all other organizations. NASA issued a class deviation removing the invoice requirement in 2018, and the deviation is available on the GPC website.
Electronic Funds Transfer	Appendix D33	Removed term D33 as it describes paying recipients through Treasury Fedline Payment System and the Automated Clearing House. HHS PMS is now used to pay recipients, so this info is no longer relevant.
Preservation of Lunar Artifacts	Appendix D37	Language from GIC 21-07, Protecting and Preserving Lunar Artifacts, has been inserted into the terms and conditions template.

New Technology Report (NTR) applicability	Appendix F	Removed language stating that awards that solely support education programs are exempted from submitting New Technology Reports.
FFATA Reporting Requirements	Appendix F	Updated table in Appendix F to note FFATA subaward reporting requirements per 2 CFR 170 and GCAM, Appendix D4.
Routine Monitoring Plan (Implementation January 2, 2022)	Appendix H	Addition of the NASA Routine Monitoring Plan.