



National Aeronautics and
Space Administration
Washington, DC 20546

Class Deviation Grants and Cooperative Agreements

CD 18-01
April 9, 2018

CLASS DEVIATION to Micro Purchase Threshold And Simplified Acquisition Threshold

PURPOSE: Effect a class deviation from 2 CFR 1800 Uniform Guidance to increase the micro-purchase threshold (MPT) from \$3,500 to \$10,000 and the simplified acquisition threshold (SAT) from \$150,000 to \$250,000.

BACKGROUND:

The National Defense Authorization Act for Fiscal Year 2018 (NDAA FY18) (Public Law 11591), Sections 806 and 805 respectively, increased the MPT to \$10,000 and the SAT to \$250,000.

Additionally, Section 217(b) of the NDAA FY 2017 (Public Law 114-328) changed a portion of the MPT definition in FAR 2.101 to increase the MPT for acquisitions from institutions of higher education or related or affiliated nonprofit entities, or from nonprofit research organizations or independent research institutes, to \$10,000.

The Uniform Guidance in section 200.67 Micro-purchase and section 200.88 Simplified acquisition threshold, respectively, refer to FAR 2.1 for the current levels. FAR Case 2018-004 has been opened to implement the appropriate statutory changes in the FAR. However, NASA desires to use the increased thresholds prior to publication of the FAR changes. NASA approved a Procurement Class Deviation, PCD 18-01, on February 16, 2018 to increase the MPT and SAT.

GUIDANCE: Effective immediately, all awardees of grants and cooperative agreements shall comply with the changes set forth in the Enclosure.

EFFECTIVE DATE: This deviation from 2 CFR 1800 is effective immediately and shall remain in effect until incorporated into 2 CFR 1800, or until the increased thresholds are incorporated into the FAR, via FAR Case 2018-004.

DOCUMENTS AFFECTED BY CHANGES: The Grants and Cooperative Agreement Manual

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Additions to the baseline are shown as **[bolded and bracketed]** or **yellow highlights**. Deletions from the baseline are shown as ~~strikethroughs~~.



NASA Grant and Cooperative Agreement Manual

In Accordance with 2 CFR Part 200

Implementation Date:
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6.1.3 Methods of procurement

1. Micro-purchase Threshold. The non-Federal entity must use one of the methods of procurement as prescribed in 2 CFR 200.320[(A)]. As defined in 2 CFR 200.67, the micro-purchase threshold for acquisitions of supplies or services made under grant and cooperative agreement awards ~~issued to institutions of higher education, or related or affiliated nonprofit entities, or to nonprofit research organizations or independent research institutes~~ is —
 - a. \$10,000; [or
 - b. As set by 48 CFR Subpart 2.1 FAR] or**
 - c. Such higher threshold as determined appropriate by the head of the relevant executive agency and consistent with audit findings under chapter 75 of Title 31, United States Code, internal institutional risk assessment, or State law.

[6.1.4 Simplified Acquisition Threshold

1. **Simplified acquisition threshold. The non-Federal entity must use one of the methods of procurement as prescribed in 2 CFR 200.320(B). As defined in 2 CFR 200.88, the simplified acquisition threshold for acquisitions of supplies or services made under grant and cooperative agreement awards is —**
 - a. \$250,000; or
 - b. **As set by 48 CFR Subpart 2.1 FAR; or**
 - c. **Such higher threshold as determined appropriate by the head of the relevant executive agency and consistent with audit findings under chapter 75 of Title 31, United States Code, internal institutional risk assessment, or State law.]**