

Grant Notice

GN 24-01 September 5, 2024

Forthcoming Grant Policies in Response to 2 CFR Revisions and NSPM-33

PURPOSE: To inform NASA grant and cooperative agreement applicants and recipients of forthcoming changes to NASA's grant policies that will streamline guidance and implement requirements in Title 2 of the Code of Federal Regulations (<u>2 CFR</u>) and National Security Presidential Memorandum 33 (<u>NSPM-33</u>).

BACKGROUND:

Consolidated NASA Grant Policy

To streamline and simplify NASA-specific grant policy, the agency will release a revised edition of the *NASA Grant and Cooperative Agreement Manual* (GCAM) on October 1, 2024. The revised GCAM will combine the current <u>Grant and Cooperative Agreement Manual</u> (GCAM) and the <u>Proposer's Guide</u> into a single, consolidated document. Applicants will no longer have to consult one document for pre-award information, such as registering in NASA's proposal system and instructions on responding to Notices of Funding Opportunities (NOFOs), and a separate document for information on award, post-award, and closeout activities. The revised GCAM will provide a single source for comprehensive, NASA-specific grant policy that spans the entire grant life cycle. This document will be available on the NASA Grant Policy and Compliance <u>website</u> upon publication.

Implementing 2 CFR Revisions

In April 2024, the Office of Management and Budget (OMB) released revisions (2024 Revisions) to 2 CFR, Grants and Agreements, to incorporate OMB policy priorities, reduce agency and recipient burden, clarify language, improve flow, and address inconsistent use of terms within the guidance. OMB has published the full text and a redline version of the 2024 Revisions, a crosswalk comparing the current version of 2 CFR to the 2024 Revisions, and references guides here. NASA intends to fully adopt the revised guidance by October 1, 2024, by revising applicable language in the GCAM and via an update to NASA's grant and cooperative agreement regulations in 2 CFR 1800, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

The policies in the GCAM and 2024 Revisions will apply to new awards and funded amendments issued on or after October 1, 2024, regardless of when a proposal was submitted to NASA. This means that if a proposal was submitted in response to a NOFO prior to October 1, 2024, but the award was not issued until after October 1, 2024, that award will be subject to the GCAM and

2024 Revisions.

Implementing Disclosure Requirements

In addition to updating the GCAM to reflect the 2024 Revisions, NASA will include an updated biographical sketch and current and pending (other) support policy that implements disclosure requirements in National Security Presidential Memorandum 33 (<u>NSPM-33</u>) and section 10631 of the <u>CHIPS and Science Act</u>. A draft of NASA's disclosure policy can be found in the Federal Register <u>here</u>.

The disclosure requirements outlined in NASA's policy will apply to new awards and funded amendments issued on or after October 1, 2024. If a proposal is submitted to NASA prior to October 1 and results in an award issued on or after October 1, then the NASA Shared Services Center will contact applicants for copies of the biographical sketch and current and pending (other) support forms. NASA will soon be placing the forms on its Grants Policy and Compliance website for download, and samples of those forms can be found here.

EFFECTIVE DATE: The policies and requirements in the GCAM will apply to new grant and cooperative agreement awards and funded amendments issued on or after October 1, 2024.

REGULATION OR TERM AND CONDITION CHANGES: NASA's adoption of the 2024 Revisions and new disclosure requirements will result in changes to 2 CFR 1800 and as well as new terms and conditions for grants and cooperative agreements.

HEADQUARTERS CONTACTS: <u>hq-dl-grants-policy-compliance@mail.nasa.gov</u>