



OCFO

OFFICE OF THE CHIEF FINANCIAL OFFICER

2020 EPSCoR Caucus – Grants Policy

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Office of the Chief Financial Officer

Changes to NASA Grants Policy



Overview

- Major revisions to Title 2 of the Code of Federal Regulations part 200 (2 CFR 200)
- Revisions to 2 CFR 1800 (i.e., NASA's codification of 2 CFR 200)
- Revisions to the NASA Grant and Cooperative Agreement Manual (GCAM)
- Resources

Major Revisions to 2 CFR 200

2 CFR 200 provides uniform guidance for all Federal agencies that issue grants and cooperative agreements. The Office of Management and Budget (OMB) released revisions to 2 CFR 200 on August 13, 2020, and those revisions are effective for all new awards issued on or after **November 12, 2020***.

Major revisions include:

***Telecommunications prohibitions** (effective Aug 13th)

- Award recipients cannot procure or obtain services from Huawei, ZTE, Hytera Communications, Hangzhou Hikvision, Dahua, or their subsidiaries or affiliates.

*** Award termination** (effective Aug 13th)

- Agencies can now terminate awards if they no longer “effectuate the program goals or agency priorities.”

Major Revisions to 2 CFR 200 Cont'd

Emphasis on performance management

- OMB is placing additional emphasis on performance management in addition to compliance.
- Applicants will now see program goals, objectives, targets, indicators, and baseline data, where applicable, in Notice of Funding Opportunities (NOFOs) and their award terms and conditions.
- Where applicable, award recipients must report their progress against the goals, objectives, etc. listed in their award terms and conditions.

Final report due dates

- All final reports are now due 120 days after the award ends.
- Final reports for subaward recipients are still due within 90 days.

Major Revisions to 2 CFR 200 Cont'd

Budget periods

- Awards must now include a budget period *and* a period of performance.

SAM.gov reporting

- Recipients will have to report their immediate and highest level owner as well as their subsidiaries.

Indirect cost rates to be made public

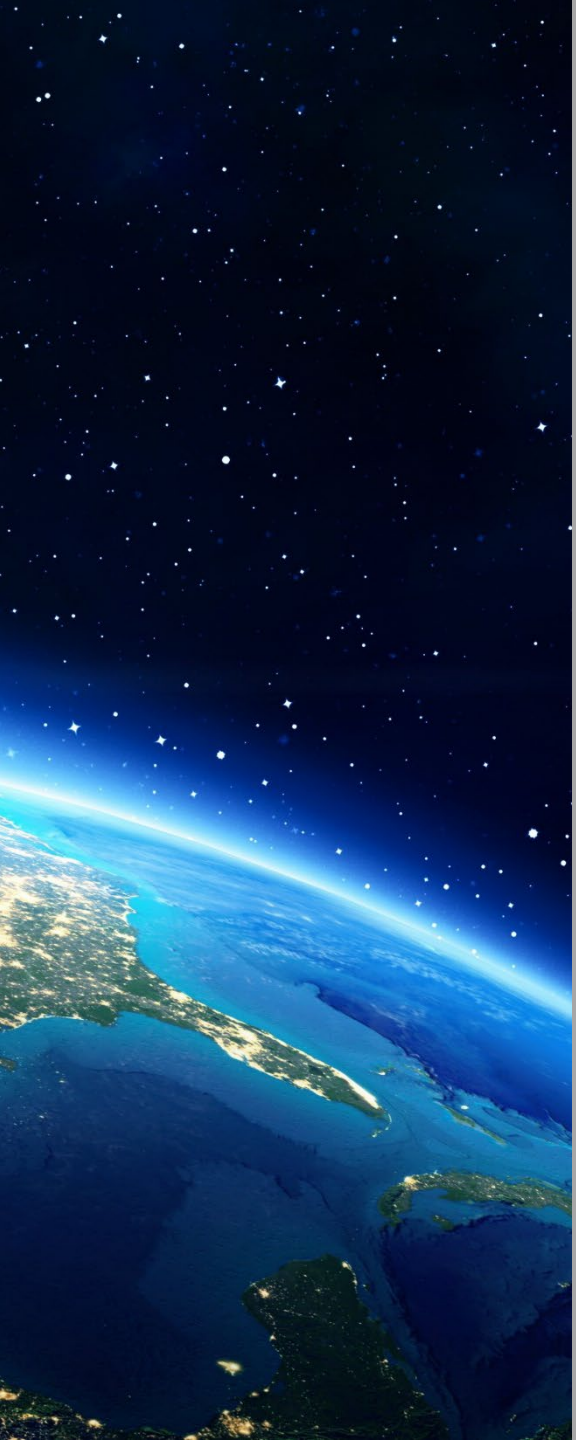
- If your organization, has a Negotiated Indirect Cost Rate Agreement (NICRA), it will have to be posted to an OMB-designated website.
- The website and its availability is TBD.



Revisions to 2 CFR 1800

2 CFR 1800 is NASA's codification of the regulations in 2 CFR 200. 2 CFR 1800 is in the process of being updated to reflect our adoption on the new regulations.

- There will be no major revisions to 2 CFR 1800.
- 2 CFR 1800 does not include significant exceptions to 2 CFR 200.
- 2 CFR 1800 has been updated to clarify 2 CFR 200's applicability to NASA award recipients.



Revisions to the Grant and Cooperative Agreement Manual (GCAM)

The GCAM has been updated to reflect the 2 CFR 200 revisions previously mentioned. It will become effective **November 12, 2020**.

Other revisions include:

- Updated performance report requirements.
- New policy regarding the reconsideration of denied proposals.
- New policy on appealing NASA's decision to suspend or terminate an award.
- New pre-award risk assessment policy.



Resources

- **2 CFR 200:**
 - Revised 2 CFR 200 with tracked changes:
https://www.performance.gov/CAP/20200812-2-CFR-Revision-Redline_Final.pdf
 - Current 2 CFR 200: <https://www.ecfr.gov/cgi-bin/text-idx?SID=3ae6a9d9787d2c740b4e0718222836e8&mc=true&node=pt2.1.200&rgn=div5>
- **2 CFR 1800:** <https://www.ecfr.gov/cgi-bin/text-idx?SID=86178a02841f1b4387be3b2d65a5453d&node=pt2.1.1800&rgn=div5>
- **The current GCAM:** https://prod.nais.nasa.gov/pub/pub_library/srba/index.html

For questions related to any of the above, please reach out to your Technical Officer and/or Grant Officer.