



NASA Grants Management under Uniform Guidance

Expanded Authorities

NASA grantees are authorized to:

- Incur pre-award costs up to 90 days before the start date of the initial budget period of a new or renewal award. (Complete the AANA form found on the Forms page on ORA's website and send to your CA.)
- Initiate a one-time, grantee-approved no-cost extension. (Complete the no cost extension request form found on the Forms page on ORA's website and send it to your CA.)
- Carry-forward unexpended balances from one funding period to the next to defray costs of any funding period of the grant.
- Rebudget to purchase equipment with a unit cost over \$5,000 not included in the approved budget. This expanded authority is only granted to grants awarded under the Federal Demonstration Partnership.

One or more of these authorities may be overridden by a special term or condition contained in the grant agreement. IT IS CRITICAL THAT YOU READ THE SPECIAL TERMS AND CONDITIONS INCLUDED IN THE GRANT AGREEMENT.

Prior Approval Needed

- Rebudgeting of funds for the **direct charging of salaries for administrative & clerical staff** not originally included in the approved budget. Prior to seeking NASA approval, the department must seek ORU or SP designation from campus.
- Rebudgeting to **add a subaward** and/or issuing a **fixed amount subaward** (up to \$150,000) that was not contemplated and explicitly justified as a fixed amount subaward at the proposal stage.

Applicability of UG terms

NASA's implementation of Uniform Guidance terms can be found at 2 CFR 1800.900—1800.920. These terms are applicable to new NASA grants (not cooperative agreements) with an effective date on or after 12/26/14. These updated UG terms are also applicable to grant supplements and incremental funding amendments issued on or after 12/26/14.

Subawards

Uniform Guidance allows for **fixed amount subawards** up to \$150,000 with the approval of the Federal agency. If a fixed amount subaward is contemplated at the proposal stage, it should be explicitly justified as a fixed amount subaward in the budget justification

A 10% MTDC de minimis rate may be used by **any organization** without a Federally-negotiated F&A rate.

NASA does not allow the payment for **profit or fee** to commercial firms through grant awards.

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