

Are We Approved Yet?

National Aeronautics and
Space Administration



EXPLORE SCIENCE

NASA Wayfaring: Exploring Prior Approvals from Diverse Grant- Issuing Programs and the NASA Shared Services

Society of Research Administrators International Annual Meeting - October 2024

Presented by Mary F. Sladek & Theresa Stanley

Aloha! Meet Your NASA Guides

**Grants Officer & Grants Activities
Branch Chief at NASA Shared Services
Center (NSSC), Stennis Space Center --
Theresa Stanley**

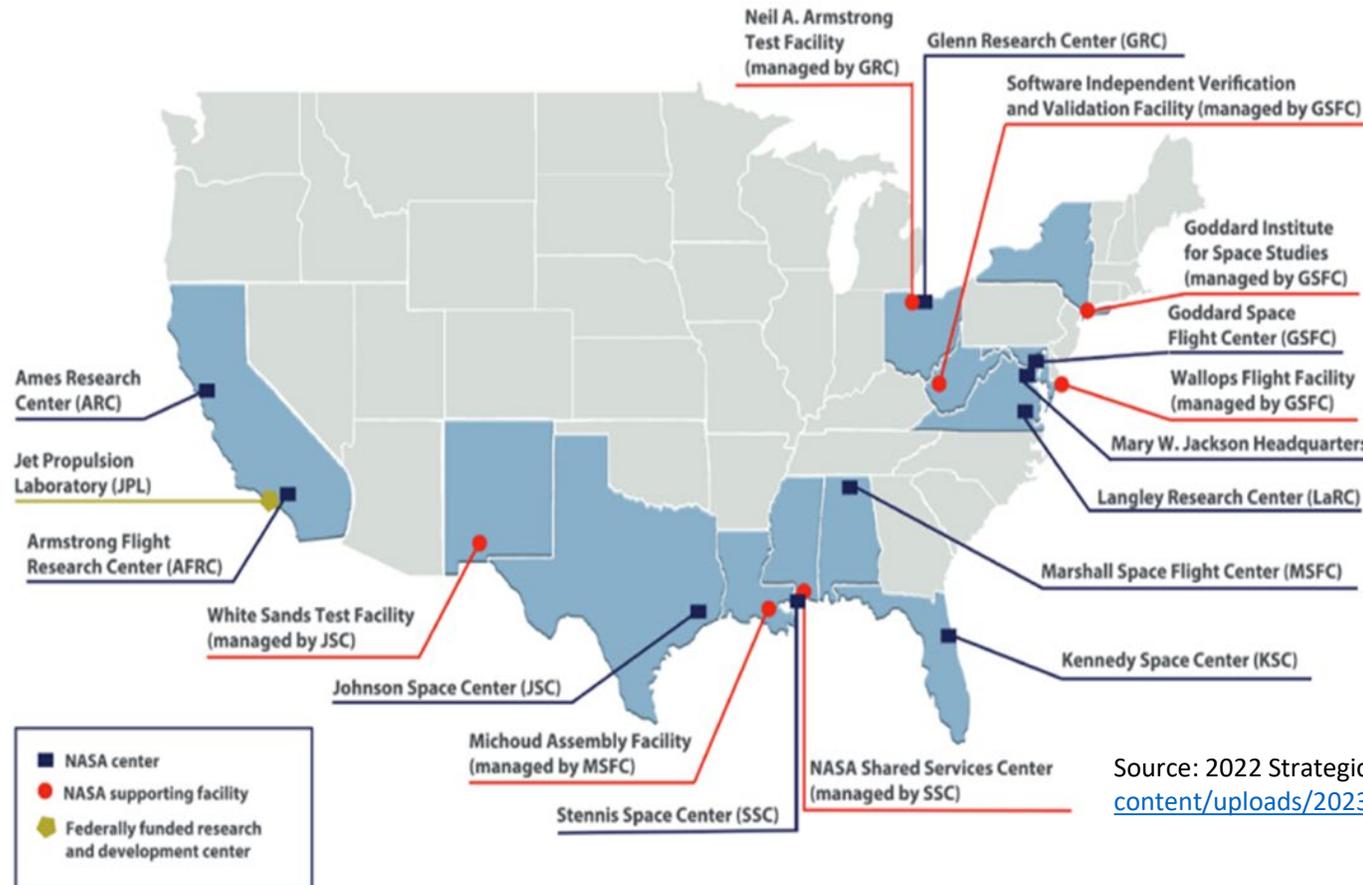


**Technical Officer & Senior Program
Manager, Science Mission Directorate,
Mary W. Jackson NASA Headquarters --
Mary F. Sladek**



Where Grant Officers (GO) and Technical Officers (TO) Work

Figure 1: NASA's Centers and Facilities



Source: 2022 Strategic Plan: https://smd-cms.nasa.gov/wp-content/uploads/2023/04/fy_22_strategic_plan-1.pdf

Aliases for NASA TOs and Example of Duties

NASA's Office of Procurement coined the term "Technical Officer" (TO). NSSC-issued award documents list a civil servant's name next to that title on the cover page. **But many TOs call themselves:**

- Scientists or Engineers or Technologists
- Managers (Grant, Program, etc.)
- Program Directors or Executives or Officer
- Other titles not listed

Some TOs have 100s of grants in their portfolio and that's most of their work year.

Some TOs have just a one or handful of grants. Grants are just a small part of a work year.

TO duties include and are not limited to monitoring the grant recipient's progress, such as reading annual and final reports.

TOs assist the NSSC with prior approvals, particularly when a scope change is requested. TOs advise the NSSC when scope changes are 1) reasonable, 2) within the confines of the funding program, and 3) whether proposed change would be drastic such as when a new award type would be needed, e.g., closing a grant and replacing with a cooperative agreement, or changing the NASA resource contributions on a cooperative agreement.

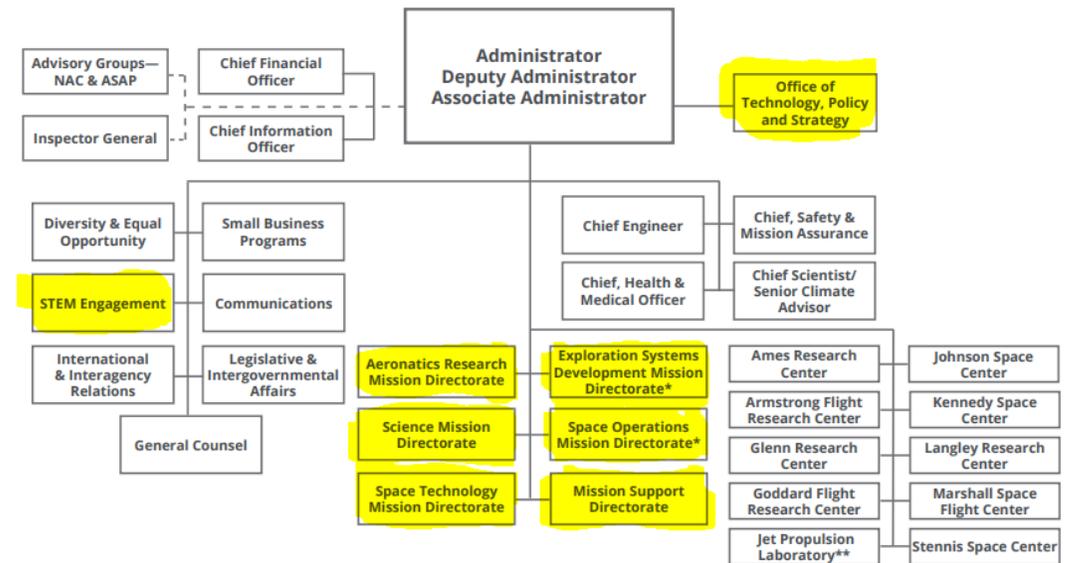
Island Hopping Through NASA's Diverse Grant & Cooperative Agreement Funders

From lower right to upper left, 1) the “Big Island” (Hawaii), 2) Maui, 3) Kahoolawe, 4) Lanai, 5) Molokai, 6) Oahu, 7) Kauai, and 8) Niihau islands all make up the state of Hawaii, which lies more than 2,000 miles from any other part of the United States. The small red dot on the Big Island’s southeastern side marks a hot spot on Kilauea Volcano’s southern flank. Kilauea has been erupting almost continuously since January 1983, and is one of the world’s best studied volcanoes. <https://earthobservatory.nasa.gov/images/3510/hawaiian-islands>

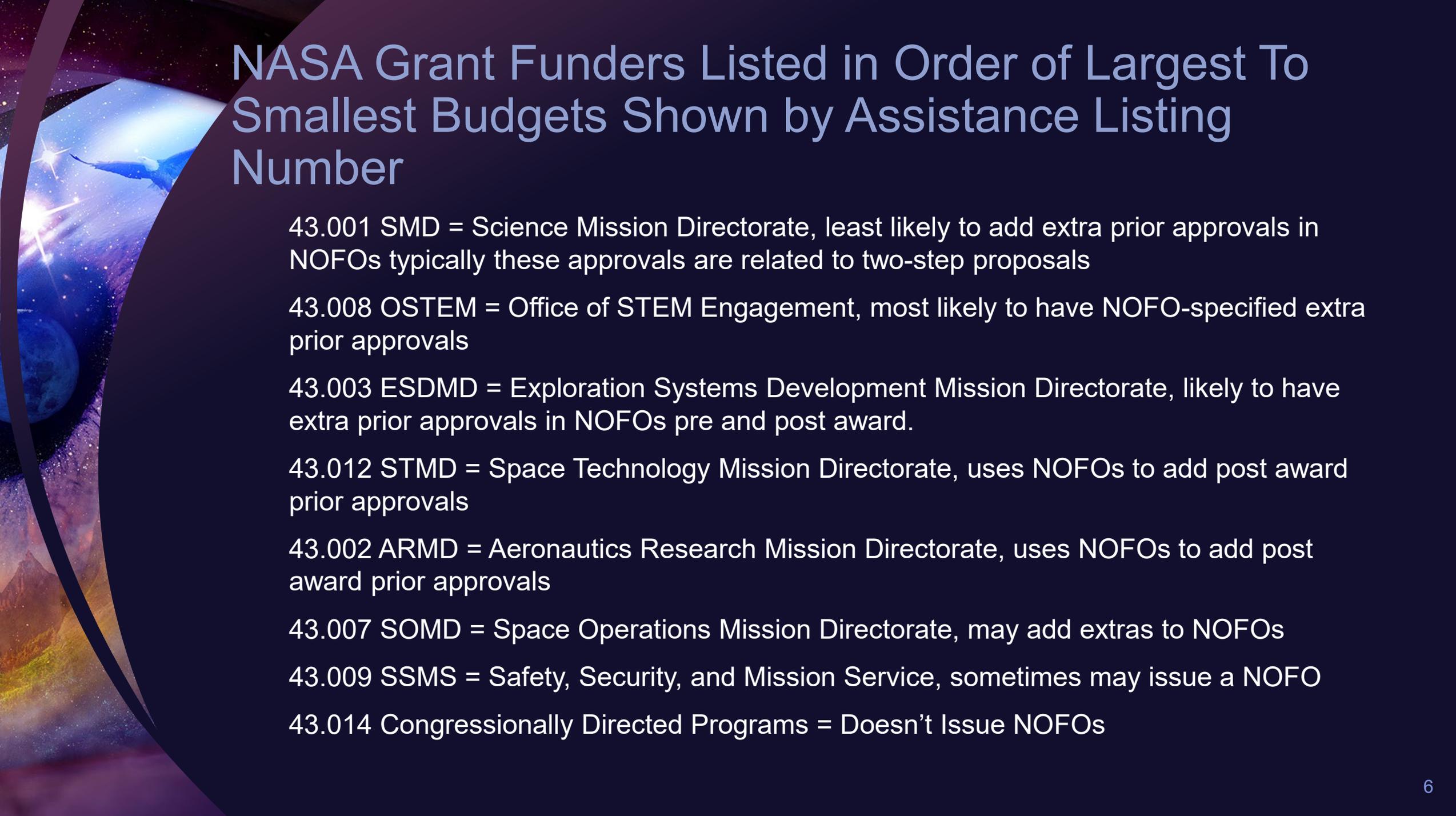


Mission Directorates and Grant-Issuing Offices are Highlighted on the Organization Chart from the 2022 Strategic Plan located at : https://smd.cms.nasa.gov/wp-content/uploads/2023/04/fy_22_strategic_plan-1.pdf

Figure 2. NASA's Organizational Structure



*The Human Exploration and Operations Mission Directorate reorganized into two Mission Directorates at the beginning of FY 2022
 **JPL is a Federally Funded Research and Development Center (FFRDC) managed by the NASA Office of JPL Management and Oversight
 Dotted lines indicate independent advisory or oversight organizations
 NASA Advisory Council (NAC)
 Aerospace Safety Advisory Panel (ASAP)



NASA Grant Funders Listed in Order of Largest To Smallest Budgets Shown by Assistance Listing Number

43.001 SMD = Science Mission Directorate, least likely to add extra prior approvals in NOFOs typically these approvals are related to two-step proposals

43.008 OSTEM = Office of STEM Engagement, most likely to have NOFO-specified extra prior approvals

43.003 ESDMD = Exploration Systems Development Mission Directorate, likely to have extra prior approvals in NOFOs pre and post award.

43.012 STMD = Space Technology Mission Directorate, uses NOFOs to add post award prior approvals

43.002 ARMD = Aeronautics Research Mission Directorate, uses NOFOs to add post award prior approvals

43.007 SOMD = Space Operations Mission Directorate, may add extras to NOFOs

43.009 SSMS = Safety, Security, and Mission Service, sometimes may issue a NOFO

43.014 Congressionally Directed Programs = Doesn't Issue NOFOs



When It Comes to Prior Approvals, NASA Funders Are Not All The Same!

- Sometimes Notices of Funding Opportunity (NOFOs) include extra, “hidden”, or unusual prior approval requirements
- **Normally**, when NASA Shared Services Center awards a proposal and budget that included some activity or cost, then no prior approval is needed
- However, **some NOFOs specify a technical officer’s approval is required even post award by the NSSC**

NOFO-Unique Prior Approvals & Special Reporting Sampler

- In the pre-proposal submission stage, some SMD NOFOs, such as NNH24ZDA001N-CDAP *C.10 Cassini Data Analysis Program (CDAP) for the Planetary Science Division*, a PI who wants to add funded investigators between the Step-1 and Step-2 proposals must inform the point(s) of contact identified in the summary table of key information at least two weeks in advance of the Step-2 due date. **Additions of funded investigators within two weeks of the Step-2 deadline require permission from the SMD point of contact.**
- OSTEM's NNH24ZHA003C-SG25 *Space Grant Opportunities in NASA STEM FY2025-2028* Section 10.2.3.3 Direct Costs Limitations states: **Foreign travel requires prior approval from the Space Grant Project Manager and shall not exceed \$5,000 per year.** Requested foreign travel shall include justification, the purpose, location, duration, airfare and per diem for each trip. . . Within ten (10) business days of the trip's conclusion, **the institution's representative** shall submit to the Space Grant Program Office a post-trip summary report that describes the benefits gained as a result of the trip. **If a summary report is not provided, the Space Grant Program Manager has the discretion to limit the Consortium's future foreign travel request(s).**
- **STMD's NASA Space Technology Graduate Research Opportunities (NSTRGO) has a requirement that the Technical Officer sign off on the FIRST no cost extension.** NSTRGO grantees may not initiate a FIRST no-cost extension pursuant to 2 CFR § 1800.903 when concurrence from the Technical Officer (TO) is NOT required.



Post Award Prior Approvals From The NSSC



Prior Approvals

Prior Approvals are referenced in 2 CFR 200.308 or the NASA Grant and Cooperative Agreement Manual

- Changes to the award's scope, budget, or key personnel;
- Changes to PI or other key personnel or disengagement of PI from the project for more than three months or a 25% reduction in time;
- Subawards not previously proposed and approved;
- Equipment not originally proposed (except for Research Grants);
- No-cost extensions for more than 12 months;
- Incurred project costs more than 90 calendar days before the start date of the award;
- Requests for additional funding or time on existing awards that will result in the award exceeding \$5 million and a five-year POP will also require prior approval from NASA, and recipients must submit requests to the GO at least 60 days prior to the end of the POP;
- Any NASA Program requiring prior approvals (this would be included in the Terms & Conditions of your award as a Program Specific Term & Condition);
- NASA Prior Approval Matrix for Research Awards;
- Request for payments after the 120-day closeout period.

Prior Approvals

Appendix A: NASA Prior Approval Matrix for Research Awards

	2CFR 200 Reference	NASA Reference (Where applicable)	NASA
Prior Written Approval (prior approval)*	200.407		
Cost sharing	200.407(a)	GCAM ** Chapter 2 Section 23.0	
Use of unrecovered indirect costs, including indirect costs on cost sharing	200.306(c)		Waived
Use of current fair market value to determine the value of non-Federal entity contributions of services and donations of property for the purposes of cost sharing	200.306(d)(2)		Waived
Costs of the fair market value of equipment or other capital assets and fair rental charges for land when the Federal award supports activities that require use of equipment, buildings or land.	200.306(h)(2)		Required
Program Income	200.407(b)		
Use of program income during the period of performance (additive method).	200.307(b)(2)		Waived ¹
Revision of budget and program plans	200.407(c)		
Change in the scope or the objective of the project or program.	200.308(f)(1)		Required
Change in a Principal Investigator (PI) and any co-PIs identified by name or position on the project	200.308(f)(2)	GATC*** Chapter 1 Section 1.10	Required
Disengagement from the project for more than three months, or a 25 percent reduction in time and effort devoted to the project over the course of the period of performance, by the approved	200.308(f)(3)	GATC*** Chapter 1 Section 1.10	Required
inclusion, unless waived, of costs that require prior approval in accordance with Subpart E -- as applicable	200.308(f)(4)		Required
Transfer of funds budgeted for participant costs to other budget categories	200.308(f)(5)		
Transfer of funds into the participant support cost category	200.456		Required
Subaward activities not included in the proposal and approved in the award; this requirement does not apply to procurement transactions for goods and services.	200.308(f)(6)		Required
Changes in the total approved cost-sharing amount	200.308(f)(7)		Required
Need arises for additional Federal funds to complete the project.	200.308(f)(8)		Required
Transferring funds between the construction and non-construction work under a federal award	200.308(f)(9)		Required
A no-cost extension or extension of more than 12 months.	200.308(f)(10)	GCATC Chapter 1 Section 1.8	Required
Incur project costs 90 calendar days before the start date of the award	200.308(g)(1)	GCAM Chapter 2 Section 21.0	Waived
Incur project costs more than 90 calendar days before the start date of the award	200.308(g)(1)	GCAM Chapter 2 Section 21.1	Required

Prior Approvals -- More Appendix A

		2CFR 200 Reference	NASA Reference (Where applicable)	NASA
	Initiate a one-time extension of the period of performance by up to 12 months.	200.308(g)(2)	GCATC Chapter 1 Section 1.8	Waived
	Carry-forward unobligated balances to subsequent budget periods.	200.308(g)(3)		Waived
	Transfer amounts budgeted for indirect costs to absorb increases in direct costs, or vice versa.	200.308(h)		Waived
	Restrict the transfer of funds among direct cost categories or programs, functions and activities for awards in which the Federal share of the project exceeds the simplified acquisition threshold, and the cumulative amount of such transfers exceeds or is expected to exceed 10 percent of the total budget, including cost share, as last approved by NASA	200.308(i)		Waived ^{2,3}
Fixed amount subawards		200.407(d)		
	Subawards based on fixed amounts up to \$500,000; fixed amount subawards must meet the requirements of 200.201.	200.333		Required
Compensation -- personal services, paragraph (h)		200.407(e)		
	Directly charge payments of incidental activities for which supplemental compensation is allowable under written institutional policy (at a rate not to exceed institutional base salary).	200.430(i)(1)(ii)		Waived
	Faculty salary in excess of institutional base salary	200.430(i)(2)		Required
	Intra-IHE faculty consulting on an award that exceeds a faculty member's base salary.	200.430(i)(3)		Waived
Compensation -- fringe benefits		200.407(f)		
	Severance payments to foreign nationals employed by the recipient or subrecipient outside the US that exceed the amounts customary in the US.	200.431(i)(4)		Required
	Severance payments to foreign nationals employed by the recipient or subrecipient outside the US due to termination of the foreign national as a result of the closing of, or curtailment of activities by, the recipient and subrecipient in that country.	200.431(i)(5)		Required
Equipment and other capital expenditures		200.407(g)	GCAM Chapter 1 Section 10.9	
	Transfer of title to NASA or to a third party designated/approved by NASA	200.311(d)(3)		Required
	Encumber equipment acquired with Federal funds	200.313(c)(1)		Required
	Direct charge capital expenditures for general purpose equipment.	200.439(b)(1)		Waived ^{2,4}
	Direct charge capital expenditures for buildings and land use.	200.439(b)(1)		Required
	Direct charge capital expenditures for special purpose equipment over \$10,000	200.439(b)(2)		Waived ^{2,4}
	Capital expenditures for improvements to land, buildings, or equipment that materially increase their value or useful life.	200.439(b)(3)		Required
Exchange rates		200.407(m)		
	Exchange rate fluctuations that result in the need for additional Federal funding, or a reduction in the scope of the project.	200.440(a)		Required
Fines, penalties, damages and other settlements		200.407(i)		
	Costs resulting from recipient or subrecipient violations of, alleged violations of, or failure to comply with, Federal, State, local, Tribal, or foreign laws and regulations.	200.441		Required

Prior Approvals -- More Appendix A

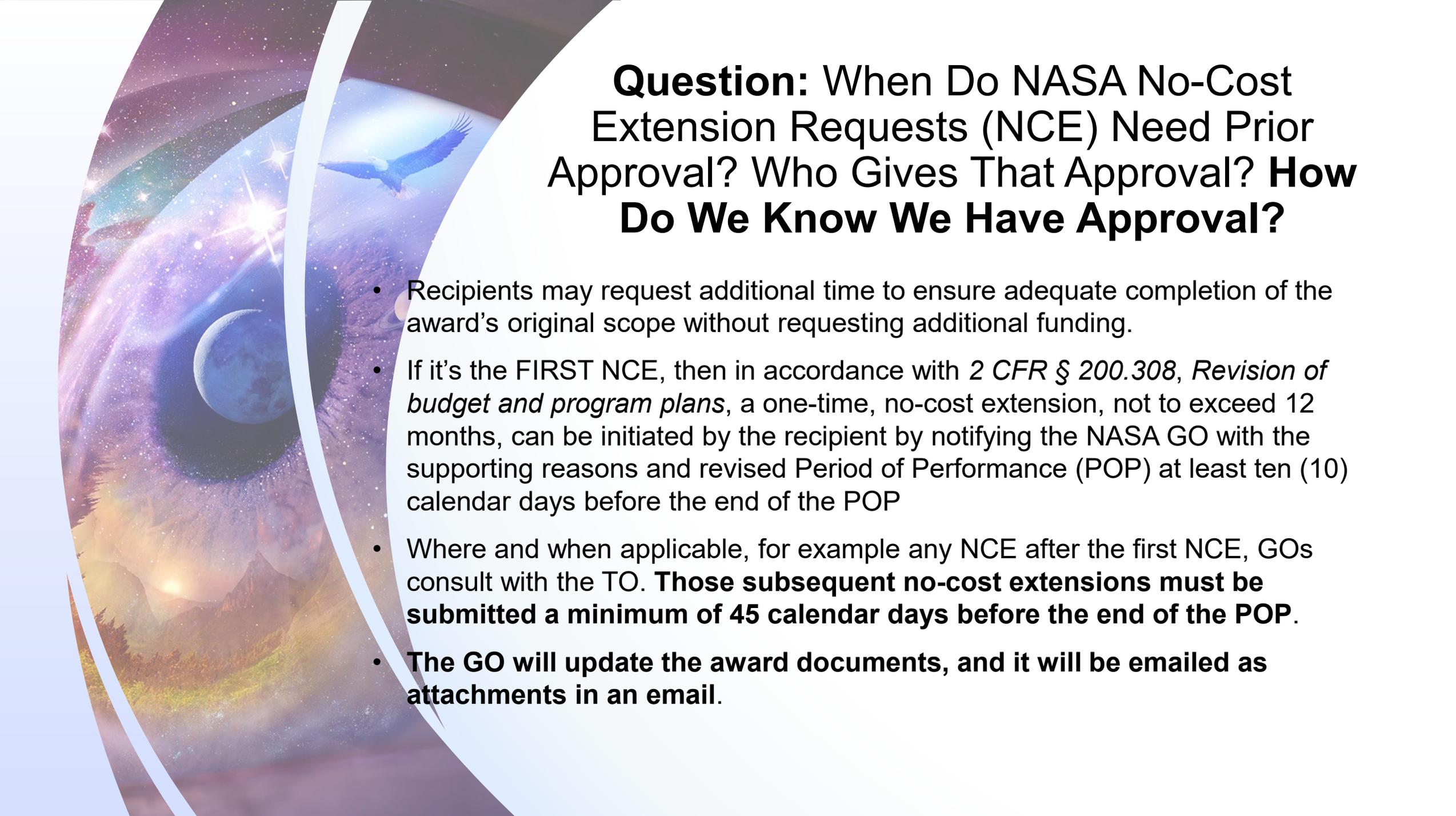
		2CFR 200 Reference	NASA Reference (Where applicable)	NASA
Fund raising and investment management costs		200.407(j)		
	Fund raising costs for the purposes of meeting the Federal program objectives.	200.442(a)		Required
Goods or services for personal use		200.407(k)		
	Housing costs (e.g., depreciation, maintenance, utilities, furnishings, rent, housing allowances and personal living expenses).	200.445(b)		Required
Insurance and indemnification		200.407(q)		
	Costs of insurance or of contributions to any reserve covering the risk of loss of, or damage to, Federal Government property.	200.447(b)(2)		Required
Organization costs		200.407(m)		
	Costs such as incorporation fees, brokers' fees, fees to promoters, organizers or management consultants, attorneys, accountants, or investment counselors, whether or not employees of the recipient or subrecipient in connection with the establishment or reorganization of an organization.	200.455		Required
Rearrangement and reconversion costs		200.407(o)		
	Direct charge special arrangements and alterations costs incurred specifically for an award.	200.462(a)		Required
Travel costs		200.407(p)		
	Inclusion of travel costs for officials covered by 200.444	200.475(a)		Required
	Travel costs for dependents for travel of duration of six months or more.	200.475(c)(2)		Required
*	Any of the authorities may be over-ridden by a special term or condition of award.			
**	NASA Grant and Cooperative Agreement Manual (GCAM)			
***	NASA Grant & Cooperative Agreement Terms and Conditions (GCATC)			
1	With prior approval, may use to meet cost share requirement.			
2	Waived unless results in a change of scope.			
3	Waived unless total cost share amount is reduced from what was approved in budget.			
4	Waived if the cost of equipment is appropriately prorated among the activities to be benefitted.			

Prior Approvals -- End of Appendix A

		2CFR 200 Reference	NASA Reference (Where applicable)	NASA
Fund raising and investment management costs		200.407(j)		
	Fund raising costs for the purposes of meeting the Federal program objectives.	200.442(a)		Required
Goods or services for personal use		200.407(k)		
	Housing costs (e.g., depreciation, maintenance, utilities, furnishings, rent, housing allowances and personal living expenses).	200.445(b)		Required
Insurance and indemnification		200.407(q)		
	Costs of insurance or of contributions to any reserve covering the risk of loss of, or damage to, Federal Government property.	200.447(b)(2)		Required
Organization costs		200.407(m)		
	Costs such as incorporation fees, brokers' fees, fees to promoters, organizers or management consultants, attorneys, accountants, or investment counselors, whether or not employees of the recipient or subrecipient in connection with the establishment or reorganization of an organization.	200.455		Required
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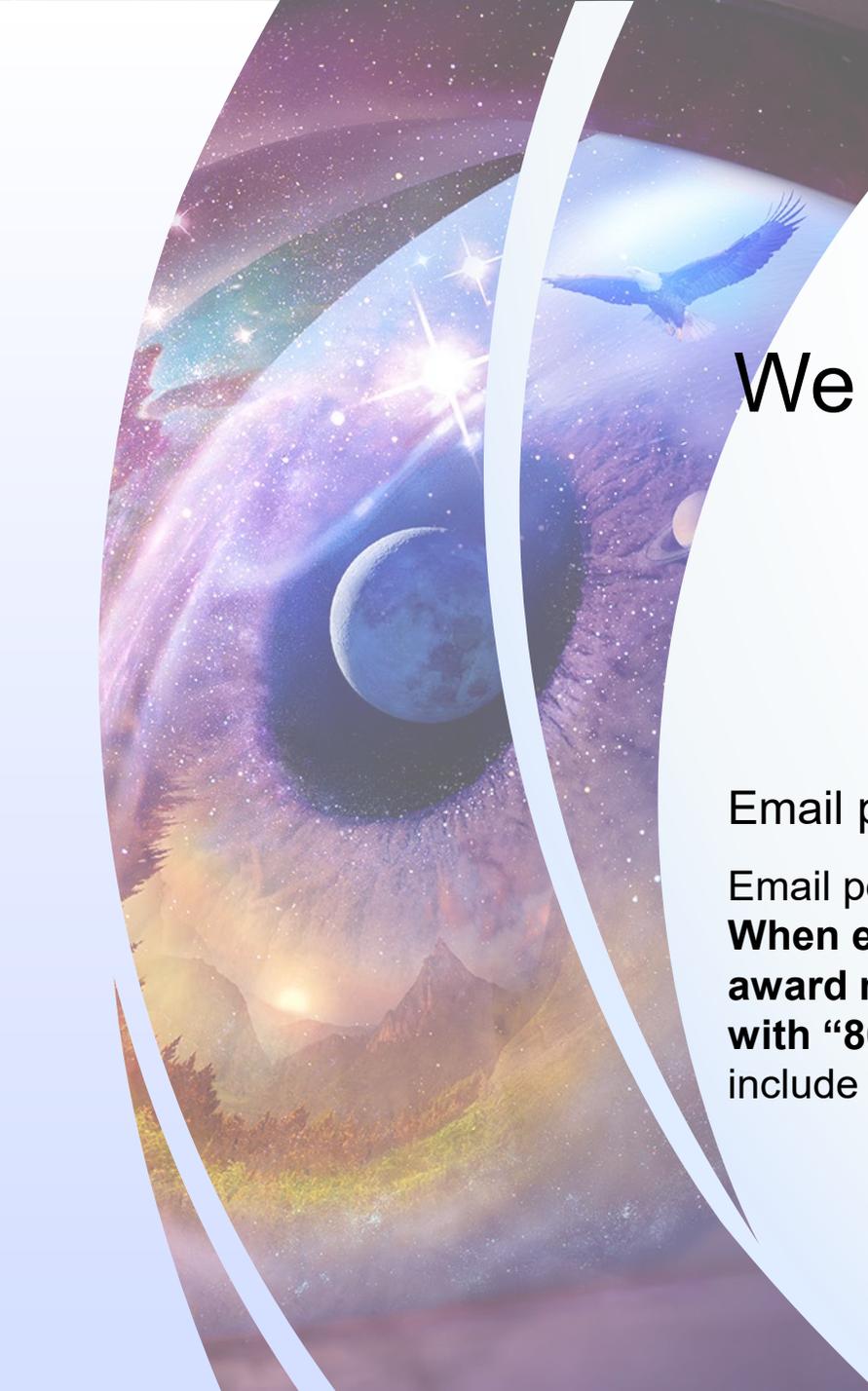
Make A Request to the NSSC & Get A Prior Approval

- Request for prior approvals are submitted to the **Administrative Grant Officer (AGO)** via email to nssc-contactcenter@mail.nasa.gov.
- Technical Officers (TO) must be copied on all prior approval requests for TO concurrence; the TO cannot approve any prior approval requests.
- **The AGO will review the request, 1) provide the approval or disapproval response via email and 2) determine if an award supplement, that is an update/revision to the award documents, or memo to the file is needed.**
- The NASA Grant Recipient must keep a copy of the email response for their records.



Question: When Do NASA No-Cost Extension Requests (NCE) Need Prior Approval? Who Gives That Approval? How Do We Know We Have Approval?

- Recipients may request additional time to ensure adequate completion of the award's original scope without requesting additional funding.
- If it's the FIRST NCE, then in accordance with *2 CFR § 200.308, Revision of budget and program plans*, a one-time, no-cost extension, not to exceed 12 months, can be initiated by the recipient by notifying the NASA GO with the supporting reasons and revised Period of Performance (POP) at least ten (10) calendar days before the end of the POP
- Where and when applicable, for example any NCE after the first NCE, GOs consult with the TO. **Those subsequent no-cost extensions must be submitted a minimum of 45 calendar days before the end of the POP.**
- **The GO will update the award documents, and it will be emailed as attachments in an email.**



Questions or Comments?

We hope you have enjoyed your voyage with us today! –Theresa Stanley & mary.f.sladek@nasa.gov

Email pre-award policy questions to: hq-dl-grants-policy-compliance@nasa.gov

Email post award and award-specific questions to: NSSC-CONTACTCENTER@nasa.gov

When emailing the NSSC always include in the subject line; 1) the NSSC-issued award number, which is a combination of 13 alphanumeric characters, that will start with “80NSSC”, 2) the PI Name, and 3) the Institution Name. Failure to use and include the three items in the email subject line may significantly delay processing.



Back Up Charts



ARMD Has Several NOFOs with Unique Prior Approvals & Special Reporting Two Examples

- [University Innovation Project](#) has two portfolio items with organizational unique prior approval requirements. For example, The [University Leadership Initiative \(ULI\)](#) solicitation [NNH24ZEA001N-ULI](#) requires **(pre-award)**:
Proposed Use of Unique NASA Capabilities -- If use of NASA facilities is proposed, the costs associated with fabricating test articles, fixtures, instrumentation, and testing required should be included in the proposed cost. Specific timeframe and duration of testing will be negotiated upon selection of a proposal. For use of a NASA facility, a letter of commitment from the facility manager, or equivalent, should be included in the Step-B proposal.
- **Advanced Air Vehicles Program (AAVP) Fellowships Program**--is unique in a few ways, the key thing is that ARMD makes awards to faculty members who are advising MS or PhD students, who are proposing to work on specific problem areas that laid out in the NOFO. Post Award example from the NOFO
“Fellow Professional Development Allowance: This allowance may be used in direct support of training, attendance at technical and scientific conferences, and publication needs of the Fellow. This allowance may be used in concurrence with the Faculty Advisor Allowance to cover the Fellow’s approved domestic travel to technical and scientific meetings. Each Fellow shall attend at least one technical conference (in person or virtual) to present the work he or she is conducting under the awarded research proposal. All technical conferences shall follow procedures for approval by the Fellowship program. Conferences are to be attended after the first year of the research training grant. Fellows presenting their research papers at conferences shall have advanced written approval to do so from their NASA Technical Advisors and NASA’s export control office.”

2 CFR 200 NASA Implementation Resources

- [NASA Grant and Cooperative Agreement Manual \(GCAM\)](#): This public-facing document provides comprehensive guidance for grant applicants and recipients pertaining to all phases of the award life cycle. To streamline guidance, all information previously found in the *NASA Proposer's Guide* has been fully integrated into the GCAM.
- [Introduction to the GCAM](#): This quick reference guide provides a summary of the GCAM's purpose and contents.
- [General and Special Terms and Conditions \(T&Cs\)](#): NASA's grant T&Cs were previously included in the GCAM as an appendix. To facilitate navigation to the T&Cs and allow NASA to archive expired T&Cs per OMB requirements, OP has removed the T&Cs from the GCAM and made them a standalone document.
- [Award Life Cycle](#): This resource provides an overview of the four phases of the grants management life cycle (pre-award, award, post-award, and closeout) and the activities therein.
- [Award Mechanisms](#): This document provides guidance on how to differentiate between and properly use grants, cooperative agreements, and contracts.

Links & Resources

NASA Grants & Cooperative Agreement YouTube Playlist – Features training sessions and informative talks related to grants and cooperative agreements: [NASA Grants and Cooperative Agreements - YouTube](#)

NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES) – Official NASA system used for posting Notice of Funding Opportunities, receiving, evaluating and selecting proposals: <https://nspires.nasaprs.com>

Grant Policy and Compliance webpage – Includes list of grants related regulations and guidance, Resources & Training, Points of Contacts, and FAQs: <https://www.nasa.gov/offices/procurement/gpc>

NASA Shared Services Center – Includes useful information and resources for grantees(i.e., grant status, required documentation for award packages, etc..) <https://www.nasa.gov/centers/nssc/grants> & the admin request webform <https://www3.nasa.gov/centers/nssc/forms/grantcooperative-agreement-administrative-supplement-request>

NASA's MSI Exchange – Platform used to support the search for innovative academic collaborators by curating STEM offerings and capability statements of MSIs nationwide. The exchange can inform partnerships for teaming opportunities and competitive federal awards such as contracts, cooperative agreements and grants: <https://msiexchange.nasa.gov>

- Users are encouraged to register to the MSI exchange mailing list, to receive occasional updates about training, events, funding and student opportunities as well as other ways MSIs can engage with NASA. <https://msiexchange.nasa/subscribe>

NAME and Number of the Assistance Listing/ Email for AL's Point(s) of Contact (POC)	Other Information
Science Mission Directorate (SMD) 43.001/ mary.f.sladek@nasa.gov	HQ-Senior-Advisor-for-Research-and-Analysis HQ-SARA@nasa.gov Locate SMD Program Officer's Emails by visiting this list: https://science.nasa.gov/researchers/sara/program-officers-list/ Hyperlink to the Grants Policy Branch's Science Mission Directorate (SMD) Fact Sheet also available at https://www.nasa.gov/grants-policy-and-compliance-team/
Aeronautics Research Mission Directorate (ARMD) 43.002/ nnijhawa@nasa.gov	ARMD issues an omnibus or compendium of competitive opportunities as a NASA Research Announcement (NRA) NNH24ZEA001N called Research Opportunities in Aeronautics (ROA) 2024: Hyperlink to ROA's List of All Program Elements
Exploration Systems Development Mission Directorate (ESDMD) 43.003/ shermane.l.martino@nasa.gov marlana.h.dorman@nasa.gov	Stephen Davison, PhD HEOMD Program Executive, Human Spaceflight Capabilities Division Mary W. Jackson NASA HQ also works with grants stephen.c.davison@nasa.gov
Space Operations Mission Directorate (SOMD)/ robyn.gatens@nasa.gov	Task Book is an online database of research projects supported by NASA's Biological & Physical Sciences (BPS)—within SMD-- Division and Human Research Program (HRP)—the main federal financial assistance activity within SOMD-- https://taskbook.nasaprs.com/tbp/welcome.cfm . HRP POC: carol.a.mullenax@nasa.gov
Office of STEM Engagement (OSTEM) 43.008 sarah.m.mcgarvey@nasa.gov	Examples of Recent now closed NOFOs & NOFO POC: NOFO Type: Cooperative Agreement Notice (CAN) 2024 Established Program to Stimulate Competitive Research (EPSCoR) Rapid Response Research (R3) Opportunity: POC: : kathleen.b.loftin@nasa.gov Kennedy Space Center, FL 32899-0001 Space Grant Opportunities in NASA STEM FY2025-2028: NEW POC as of October 1: James.L.Stofan@nasa.gov , NASA HQ NOTE: Both Space Grant and EPSCoR have authorizations and appropriations put restrictions on who can receive the funding. Example of a NOFO Closing 30 October 2024 Minority University Research and Education Project (MUREP) Earth Science Systems Research (ESSR)—joint with SMD—MUREP ESSR POC: james.l.harrington@nasa.gov , Goddard Spaceflight Center, MD & Selection Officer keya.briscoe@nasa.gov , Johnson Space Center, TX
Space Technology Mission Directorate (STMD) 43.012/ laguduva.r.kubendran@nasa.gov currently on another assignment STMD Alternate POC krista.y.jensen@nasa.gov	NOFOs and Programs include and are not limited to Flight Opportunities; Game Changing Development(GCD); Lunar Surface Innovation Initiative; NASA Innovative Advanced Concepts (NIAC); The Small Business Innovation Research (SBIR) And Small Business Technology Transfer (STTR); Small Spacecraft Technology; and Space Technology Research Grants (STRG). NOTE each NOFO or program within the NOFO will have a different POC from LK, the AL POC. More about Space Technology Research Grants (STRG) https://www.nasa.gov/about-strg/