



National Aeronautics and
Space Administration

NASA Shared Services Center
Stennis Space Center, MS
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NASA Shared Services Center Process Work Instruction

NSPWI-5100-0003 Revision 7.0

Effective Date: September 15, 2021
Expiration Date: September 14, 2022

Research Activities Branch Administration
- FOR NSSC INTERNAL USE ONLY -

Responsible Office: Procurement Division

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Approved by


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 Vicory
 Date: 2021.09.15 17:50:39 -05'00'

Michael Vicory
 Chief, Procurement Services

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DOCUMENT HISTORY LOG

| Status | Document Version | Effective Date | Description of Change |
|----------|------------------|----------------|---|
| Basic | 1.0 | 04/06/2012 | Basic release |
| Revision | 2.0 | 06/15/2014 | Revisions for changes in regulation. Document originated under NSWI-5100-0005 and was renumbered to align with the NSSC Document Management Program Procedural Instruction (NSNPI-1410-0001). |
| Revision | 3.0 | 06/15/2015 | Revised section 1 to add sentence regarding Service Provider support. Updated regulation references with new OMB uniform guidance, 2 CFR 200, and NASA's implementation of such guidance, 2 CFR 1800. Revised section 4, paragraph g. clarifying audit duties. Revised section 4, paragraph h. due to 2 CFR 200 implementation. Revised section 4, paragraph n. regarding report. |
| Revision | 4.0 | 05/9/2017 | Revised section 4, paragraph h was deleted as unsolicited process is no longer applicable Revised section 4, paragraph C to move all administrative activities under this category Revised section 4, paragraph I which was n to identify the delegation of property |

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|----------|-----|-----------|---|
| | | | <p>Revised section 4, paragraph m which was o to clarify the ACO's responsibility</p> <p>Revised section 4, paragraph f which was g single audit requirements</p> <p>Revised section 4 to include new administrative activities paragraphs d and p</p> <p>Updated all administrative activities to provide more details</p> |
| Revision | 5.0 | 06/8/2018 | <p>Revised the title of the document for clarification</p> <p>Revised section 3, to include Grant and Cooperative Agreement Manual (GCAM)</p> <p>Revised section 4, paragraph A to correct Novation agreement/change-of-name and include Contract Termination</p> <p>Revised section 4, paragraph A updated second sentence to read "for his/her assigned" and removed "annual"</p> <p>Revised section 4, paragraph B updated CS task</p> <p>Revised section 4, paragraph C section a, changed Office of Naval Research to Department of Interior</p> |

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|----------|-----|-----------|--|
| | | | <p>Revised section 4, paragraph K to add "Phase II" and update process</p> <p>Revised section 4, paragraph M to change "ACO" to "AGO".</p> |
| Revision | 6.0 | 5/14/2020 | <p>Revised section 2, to include 2 CFR 1800</p> <p>Revised section 3, to include 2 CFR 1800</p> |
| Revision | 7.0 | 5/13/2021 | <p>Combined Section 2 & 3 to read Authority, Applicable Documents and References;</p> <p>Revised Section 3, section A to include Government purchase card payments/reconciliation;</p> <p>Revised Section 3, 9b to add the P-card pilot process;</p> <p>Reformat Section 3 section C;</p> <p>Revised Section 3, 11 updating Virtual Site Visit process;</p> <p>Add paragraph 19, Residual grants and paragraph 20 Pre-ward risk assessment process</p> |

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1.0 Purpose

This instruction provides the NSSC Procurement Research Activities Branch the responsibilities of designated contract specialists in support of administration for Grants, Cooperative Agreements, Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) awards. Generally, the designated contract specialists will be members of the branch's administrative team and will be supported by the NSSC Service Provider (SP) team. For the purposes of this work instruction document, when the term grant is used in the following sections, it refers to both grants and cooperative agreements awarded at the NSSC. Likewise, when the term SBIR is used, it refers to both SBIRs and STTRs awarded at the NSSC. Also, when the terms Lead Contract Specialist is used, it refers to the Lead for the SBIR Program. Likewise, when the terms Lead Grant Specialist is used, it refers to the Lead for Grants.

2.0 Authority, Applicable Documents and References

Federal Acquisition Regulation (FAR)

NASA FAR Supplement (NFS)

Grant and Cooperative Agreement Manual (GCAM)

2 CFR 1800, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

2 CFR 200, Subparts A – Acronyms and Definitions, B – General Provisions, C – Pre-Federal Award Requirements and Contents of Federal Awards and D – Post Federal Award Requirements (Replaced Office of Management and Budget (OMB) Circular A-110: Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations on 26 Dec 2014)

2 CFR 200, Subpart E – Cost Principles (Replaced 2 CFR 220: Cost Principles for Educational Institutions, 2 CFR Part 225: Cost Principles for State, Local, and Indian Tribal Governments, and 2 CFR Part 230: Cost Principles for Nonprofit Institutions on 26 Dec 2014)

2 CFR 200, Subpart F – Audit Requirements (Replaced OMB Circular A-133: Audits of States, Local Governments and Non-Profit Organizations on 26 Dec 2014)

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3.0 Process

- A. Generally, a contract specialist on the administration team shall be assigned one or more NASA Centers for which the specialist will serve as a primary Point of Contact (POC) with a back-up. As POC, the specialist will serve as the Administrative Grant Officer (AGO) for grants and the Administrative Contracting Officer (ACO) for SBIRs for his/her assigned Center. The specialist shall respond to his/her respective Center inquiries and communications and make visits to his/her Centers as needed. Below are some examples of additional administrative tasks:

- Novation agreement/change-of-name
- Approval of key personnel, subcontracts or equipment
- Approval of change in scope
- Monitor Center's Principal Investigator (PI) transfers
- Approval of budget reallocation
- Contract/grant cancellation
- Contract termination
- Transfer of property
- New Technology inquiries
- Follow up on contract/grant performance
- Exercise contract options
- Government Purchase Card payments/reconciliation (Phase I only)

- B. Generally, the contract specialists on the administration team shall be responsible for awarding Grant supplements and SBIR modifications. The supplements and modifications shall be prepared by the NSSC SP team in PPS or ECC/SAP. A ticket is created in ServiceNow with several tasks which include a CS task, the task is assigned to the CS to properly track. The SBIR modifications are assigned to the appropriate Administrative Contract Specialist while the Grant Supplements are pulled from a designated group in ServiceNow (soon to be Scoped App Solutions).
- C. Generally, the contract specialists on the administration team along with the Lead Contract/Grant Specialist shall be responsible for monitoring one or more administrative activities with support of the SP team. These responsibilities and activities are listed below. Reports on these activities are developed by the SP team or contract specialist and will be filed on the P drive.
1. The Lead Grant Specialist shall be responsible for monitoring non-profit organizations with no negotiated indirect rates which were awarded a grant.

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Upon notification by the awarding Grant Officer the recipient organization has no negotiated indirect rates, the Lead Grant Specialist will ensure the recipient organization is advised of its responsibility to submit a rate proposal to its cognizant federal agency within the number of days specified by 2 CFR Part 200 Subpart E – Cost Principles. If NASA is the cognizant agency, then the Lead Grant Specialist will delegate to Department of Interior (DOI) the negotiation of indirect rates. The Lead Grant Specialist will track the progress of the negotiations until resolution and provide the approved rate agreement to the SP team to have it uploaded to the N drive for future awards and update open grant files with the approved rate agreement. The approved indirect rate agreement will be sent to the Closeout team for any closeout files pending final rates. A monthly report will be provided by the contract specialist and stored on the P drive.

2. The Lead Grant Specialist shall be responsible for monitoring recipient organizations with zero amount drawdowns for grants. The SP team will identify such recipients and remind them of their responsibilities of performing the work for which the grant was awarded. Action in accordance with GCAM, Financial Management, may be taken as warranted for recipients who do not drawdown. The SP team shall ensure the award file is updated with the correspondence. A quarterly report will be provided by the SP team and stored on the P drive.

3. The Lead Grant Specialist shall be responsible for monitoring recipient organizations identified as warranting special conditions for grants awarded to them by the NSSC. A spreadsheet listing these organizations will be provided by the Lead Grant Specialist and kept on the N drive. Factors considered in identifying such recipient organizations include repeat audit findings, delinquent reporting, and advisements by the Office of Inspector General (OIG). Pursuant 2 CFR 200.207, Special Conditions, additional requirements may be imposed as needed for these awards. Such actions include virtual desk audits of selected drawdowns and more stringent reporting requirements. These recipient organizations will be notified of the high-risk status, the reason for the status and the corrective action required for removal of the status. The SP team shall update grant files with applicable correspondence. A quarterly report will be provided by the Lead Grant Specialist and stored on the P drive.

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4. A designated contract specialist shall be the HQ Office of Inspector General (OIG) Liaison for grants and SBIRs. The designated contract specialist will coordinate inquiries, meetings, etc. for administrative, civil and criminal activities. The designee arranges and attends meetings with Acquisition Integrity Program (AIP), OIG, the Department of Justice and other attorneys.
5. A designated contract specialist shall be the point of contact for financial audits. This contract specialist shall be responsible for monitoring the prepared files for audits, coordinating responses to auditor requests, and coordinating follow-on actions resulting from audit inquiries and findings. The SP team will provide to the designated contract specialist, the electronic grant files including screenshots identified by the auditors. The SP team shall update the grant files of audit findings as necessary.
6. The Lead Grant Specialist shall be responsible for single audits by reviewing spreadsheets of single audit findings received from Headquarters (HQ) Grant Policy Office, preparing, sending, and tracking communication with the non-federal entities concerning the listed findings, preparing and sending management decision letters, updating spreadsheet, reporting HQ OIG and storing correspondence in document imaging. SP team support includes drafting the initial letter, management decision letters and sending to the non-federal entities once the Lead Grant Specialist has signed. Updating the spreadsheet with dates emails were sent is also done by the SP team. Emails, letters and spreadsheets are stored on the N drive.
7. The Lead Grant/Contract Specialists shall be responsible for the content updates for the NSSC public websites for Grants and SBIRs. The Lead Grant/Contract Specialist will work with a Communication Specialist from the Communication Relationship Management group to update the website.
8. The Lead Grant Specialist shall be responsible for monitoring suspicious drawdowns by recipient organizations for grants. After being notified by NSSC Finance of a suspicious drawdown, the Lead Grant Specialist must contact the recipient organization for fact-finding information. Once the information is received the Lead Grant Specialist will notify Finance of approval or disapproval of the drawdown. A decision may be made to place a hold on future drawdowns.

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A consolidated report of recipients will be provided by the Lead Grant Specialist and stored on the P drive.

9. A designated contract specialist on the administration team shall be responsible for monitoring the prompt approval of invoices for SBIRs. Each ACO shall be responsible for the approval of the invoices through IRIS for his/her assigned centers.
 - a. For SBIR's, the invoices shall be approved in a timely manner within 15 to 30 days after submittal of a proper invoice, certification and acceptance of deliverable(s) by a technical point of contact. SP team reviews the invoices for accuracy, which includes but not limited to, proper format, required data and timeliness. The SP team reviews the deliverables for contractual compliance, receiving CORs' review and acceptance of deliverables, certification and invoices. The SP team will send an email to the center ACO and the back-up for invoice review and approval in IRIS. Each ACO is responsible for conducting a cursory review of the technical report associated with each invoice for contractual changes. Each ACO is responsible for reviewing the SBIR Electronic Handbook (EHB) for deliverables' submittals and comments from the technical point of contact and/or the firm and for taking appropriate actions as required. Any abnormalities will be elevated to the Leads.
 - b. Special pilot program for SBIR Phase I advance payments for Small Business Concerns (SBC) that opt in using the Government Purchase Card (P-card) for payment. Three designated contract specialists on the administration team shall provide payments to the SBC within 72 hours of receiving the required invoice and invoice certification submission in the SBIR/STTR Electronic Handbook. Each contract will have two advance payments during the contract period of performance. The designated contract specialists will be responsible for monthly p-card reconciliation and/or p-card audits.
10. A designated contract specialist shall be responsible for monitoring the past performance on SBIR Phase IIs and IIIs in the Contractor Performance Assessment Reporting System (CPAR). The responsible contract specialist will work closely with the NSSC Policy Officer for monthly reports and current

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information. The responsible contract specialist shall register contractors and ACO's in the system as needed. ACOs shall monitor and complete open actions for his/her center in a timely manner and will address any rebuttals with the appropriate individuals. A monthly report will be provided by the contract specialist and stored on the P drive.

11. A designated contract specialist shall be responsible for working closely with the Lead Contract Specialist and the NSSC SP to schedule and complete virtual site visits during each Phase II award cycle when necessary. The new process for virtual site visit is set up as a deliverable in the Phase II contract; therefore, scheduling a virtual site visit is only necessary when the CO or COR request it. When necessary, ACOs shall conduct and document the virtual site visit for his/her assigned Centers with the assistance of the NSSC SP team. A report is provided as needed with any abnormalities elevated to the Lead Contract Specialist.
12. A designated contract specialist shall be responsible for monitoring the delegations of property and acceptance on grants and SBIRs. The SP team shall maintain a suspense file to track the acceptance of delegated property for grants and SBIRS from Office of Naval Research (ONR) and Defense Contract Management Agency (DCMA). The responsible contract specialist will ensure the SP team timely follows up if delegations are not accepted by ONR or DCMA. The SP team will provide a monthly status report for grants and SBIRs to the designated contract specialist and the report will be stored on the P drive.
13. A designated contract specialist shall be responsible for the follow up action towards grant recipient organizations who are non-responsive regarding delinquent progress reports. NSSC SP team support shall include providing to the responsible contract specialist a report of recipient organizations who have not submitted progress reports after receiving three delinquent notices sent automatically by ServiceNow. Each AGO shall work awards he/she is responsible for and will ensure a compliance letter is sent to the reported recipient organizations after a third delinquent notice is sent. For recipient organizations which remain non-responsive, the AGO will coordinate follow up action as warranted working with NSSC Finance to place a hold on future

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drawdowns by the recipient. The monthly report provided by the SP team will be updated by the contract specialist and stored on the P drive.

14. A designated contract specialist shall be responsible for monitoring late deliverables for SBIRs. Each ACO shall monitor his/her assigned Centers SBIR deliverables through a Late Deliverable Report prepared by the SP team. The report is submitted to the ACOs and the Lead Contract Specialist each week. Each ACO shall use the report to take appropriate action to address any late deliverables. The Contracting Officers shall review this report prior to making a new award. The ACOs shall also use these reports when reviewing past performance evaluations at the end of the contract period of performance. If the CORs do not annotate the recurring late firms, the ACOs shall remind the CORs of this observance. The responsible contract specialist shall submit a bi-weekly report to the Lead Contract Specialist clearly notating the status and actions taken to bring the contracts current.
15. The Lead Grant Specialist and Lead Contract Specialist shall be responsible for monitoring Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System (FSRS) verification performed by the NSSC SP team for grants and SBIRs awarded at the NSSC. Both Leads will take the appropriate action as needed with the grant recipients and SBIR contractors. The spreadsheet provided by the SP team on a quarterly basis will be stored on the P drive.
16. Both Leads, Grant and Contract Specialist shall be responsible for monitoring FPDS-NG discrepancies when provided by the Center Business Process Lead (CBPL). The Leads shall ensure the SP team will correct all the identified discrepancies in a timely manner.
17. A designated contract specialist shall be responsible for providing timely responses to Level 3 help desk tickets in ServiceNow.
18. The Lead Grant Specialist shall be responsible for reviewing the drawdown rate spreadsheet for fully funded multi-year grants provided by the SP team. The Lead Grant Specialist shall ensure the SP team follows up via email with grantees whose drawdown rate is disproportionate with the time elapsed in the grant's period of performance. The Technical Officer shall also be copied on the

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email, so he/she is aware. The SP team shall document the award files with these emails and resulting correspondence. The spreadsheet provided by the SP team on a quarterly basis will be stored on the P drive.

19. A designated contract specialist shall be responsible for the award and administer of all Residual Grants and Cooperative Agreements submitted to the NSSC. The contract specialist shall serve as primary point of contact for all NASA Centers submitting residual awards. These awards consist of financial assistance instruments that had previously been processed at other NASA Centers since the NSSC Go-Live in 2006. Residual awards may include complex and/or high dollar awards with commercial firms and universities or non-profits; some may require cost share.
20. Pre-award risk assessment is an ongoing process that begins and continues through the life of the award. The process includes risk mitigation, analysis, planning, monitoring and control. Many of these processes are updated throughout the award lifecycle as new risks may potentially be identified. NASA's pre-award risk assessment policy is used to assess a federal award recipient's risk for waste, fraud, and abuse when receiving, managing and expending federal funds.

The Grant Officer will be responsible for using the Pre-award Risk Assessment (PARA) Tool in accordance with 2 CFR 200.205. The PARA Tool has two key components:

- The **entity-specific risk assessment** which contains evaluation questions to address the full set of NASA risk assessment criteria.
- The **award-specific risk assessment** which contains fewer evaluation questions that focus on award-specific risk indicators.

The SP team will utilize data from: SAM.gov, CPARS, FAC, USAspending.gov, and Grant Solutions Recipient Insight to document the applicant's pre-award risk determination. The SP team will maintain and update the PARA Tool spreadsheet and store on the N drive.

4.0 Objective

See 1.0 Purpose

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5.0 Roles and Responsibilities

See 3.0 Process

6.0 Records

The official record for grant, cooperative agreement, SBIR and STTR files are listed in the Procurement Master Records Index (MRI).

7.0 Cancellation/Supersession of Previous Documents

This document replaces entirely NSWI-5100-0003 Revision 6.0.