

NASA

Memorandum for NASA Contractor and Grantee Community

Memo

January 23, 2025

“NASA Contractors and Grantees immediately shall cease and desist all DEIA activities required of their contracts or grants” and “This work may include but is not limited to: DEIA plan requirement, training, reporting, considerations for staffing, or any other direct or indirect contract or grant activity. All Contractors and Grantees shall notify their Contracting Officer or Grant Officer if they identify requirements within their contracts or grants that are in violation this guidance.”

Amendment 109: Removing DEIA Requirements from ROSES-2024

Amendment

January 20, 2025

In response to the rescission of President Bidens Executive Order 14035, “Diversity, Equity, Inclusion and Accessibility in the Federal Workforce.” “To comply with this order, SMD is in the process of amending open Program Elements in ROSES-2024 to end the Inclusion Plan Pilot Study, remove requirements for Inclusion Plans and the evaluation factors associated with them, and adjust the content of some other Program Elements to remove references to NASA’s DEIA programs. Program elements that have already received proposals will not be amended, but if they required Inclusion Plans, those plans will not be reviewed and will not impact the selection of proposals.”

Initial Guidance Regarding President Trump’s Executive Order Defending Women

Memo

NASA contractors and grantees (stamped from late last week): “Initial Guidance Regarding President Trump’s Executive Order Defending Women.” Referring back to the [prior January 20 EO](#), the NASA memo prohibits “the procurement, grant, cooperative agreement, and advertisement of gender ideological activities,” a term somewhat defined in the EO. As such, the NASA memo directs granting and contracting officers to terminate any programs, grants or contract run afoul of this directive, modify existing solicitations and templates, cancel trainings, and so on.

Initial Guidance Regarding Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government Executive Order

Memo

February 6, 2025

Contracts and Grants. NASA Contractors and Grantees immediately shall cease and desist all activities that promote or reflect gender ideology required of their contracts or grants. For Contracts, in accordance with FAR 52.242-15, Stop Work clause, a stop work order may have been issued to stop all or any part of the related activity. Additionally, FAR 52.249, Terminations clause modifications may also be issued to implement this change. For grants this cease and desist is in accordance 2 CFR 200.340 Termination. For both grants and contracts, this work may include but is not limited to: training, reporting, special emphasis programs, or any other direct or indirect contract or grant activity that promulgates gender ideology. All Contractors and Grantees shall notify their Contracting Officer or Grant Officer if they identify requirements within their contracts or grants that are in violation of this guidance.

NIH

Supplemental Guidance to the 2024 NIH Grants Policy Statement: Indirect Costs

Issued by the Office of The Director, National Institutes of Health

NIH is accordingly imposing a standard indirect cost rate on all grants of 15% pursuant to its 45 C.F.R. 75.414(c) authority. We note in doing so that this rate is 50% higher than the 10% de minimis indirect cost rate provided in 45 C.F.R. 75.414(f) for NIH grants. We have elected to impose a higher standard indirect cost rate to reflect, among other things, both (1) the private sector indirect cost rates noted above, and (2) the de minimis cost rate of 15% in [2 C.F.R. 200.414\(f\)](#) used for IHEs and nonprofits receiving grants from other agencies.

NIH Implementation

For any new grant issued, and for all existing grants to IHEs retroactive to the date of issuance of this Supplemental Guidance, award recipients are subject to a 15 percent indirect cost rate. This rate will allow grant recipients a reasonable and realistic recovery of indirect costs while helping NIH ensure that grant funds are, to the maximum extent possible, spent on furthering its mission. This policy shall be applied to all current grants for go forward expenses from February 10, 2025 forward as well as for all new grants issued. We will not be applying this cap retroactively back to the initial date of issuance of current grants to IHEs, although we believe we would have the authority to do so under 45 CFR 75.414(c)

OPM

Memorandum for Initial Guidance Regarding DEIA Executive Orders

Memo

January 21, 2025

Steps to Close Agency DEIA Offices: In light of the above Executive Orders, each should take prompt actions regarding the offices and agency sub-units focusing exclusively on DEIA initiatives and programs (the “DEIA offices”).

- January 22; Agencies must inform employees of closure and asks employees to report of any DEIA offices/programs that are being “disguised” by using coded or imprecise language.
- January 23; Agencies must provide a list of; DEIA offices and any employees who in those offices as of November 5, 2024, and a complete list of DEIA-related agency grants.
- January 31st; a written plan for executing a reduction-in-force action regarding the employees who work in a DEIA office. Agencies should coordinate with OPM in preparing these plans, b. a list of all contract descriptions or personnel position descriptions that were changed since November 5, 2024 to obscure their connection to DEIA programs.

Guidance Regarding RIFs of DEIA Offices

Memo

January 24, 2025

OPM’s initial guidance required agencies to submit written plans no later than January 31, 2025, for executing a reduction-in-force (RIF) action regarding the employees who work in a DEIA office. However, agencies can and should begin issuing RIF notices to employees of DEIA offices now. Agencies are reminded to define the competitive area solely in terms of the DEIA office where the employees worked

OMB

[Guidance Regarding Section 7 of the Executive Order Unleashing American Energy](#)

Memo

January 21, 2025

The directive in section 7 of the Executive Order entitled *Unleashing American Energy* requires agencies to immediately pause disbursement of funds appropriated under the Inflation Reduction Act of 2022 (Public Law 117-169) or the Infrastructure Investment and Jobs Act (Public Law 117-58). This pause only applies to funds supporting programs, projects, or activities that may be implicated by the policy established in Section 2 of the order. This interpretation is consistent with section 7’s heading (“Terminating the Green New Deal”) and its reference to the “law and the policy outlined in section 2 of the order.”

For the purposes of implementing section 7 of the Order, funds supporting the “Green New Deal” refer to any appropriations for objectives that contravene the policies established in section 2. Agency heads may disburse funds as they deem necessary after consulting with the Office of Management and Budget.

[Guidance on Agency RIF and Reorganization Plans Requested by Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative](#)

Memo

February 26, 2025

Pursuant to the President’s direction, agencies should focus on the maximum elimination of functions that are not statutorily mandated while driving the highest-quality, most efficient delivery of their statutorily-required functions. Agencies should also seek to consolidate areas of the agency organization chart that are duplicative; consolidate management layers where unnecessary layers exist; seek reductions in components and positions that are non-critical; implement technological solutions that automate routine tasks while enabling staff to focus on higher-value activities; close and/or consolidate regional field offices to the extent consistent with efficient service delivery; and maximally reduce the use of outside consultants and contractors. When taking these actions, agencies should align closures and/or relocation of bureaus and offices with agency return-to-office actions to avoid multiple relocation benefit costs for individual employees.

[Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs](#)

Memo

Q&A Document

January 27, 2025

To implement these orders, each agency must complete a comprehensive analysis of all of their Federal financial assistance programs to identify programs, projects, and activities that may be implicated by any of the President’s executive orders. In the interim, to the extent permissible under

applicable law, Federal agencies must temporarily pause all activities related to obligation or disbursement of all Federal financial assistance, and other relevant agency activities that may be implicated by the executive orders, including, but not limited to, financial assistance for foreign aid, nongovernmental organizations, DEI, woke gender ideology, and the green new deal.

Health and Human Services

[Directive on Immediate Pause on Documents and Public Communications](#)

Directive

January 21, 2025

Program officers may speak to a PI, and for HHS staff to have one on one conversations with non-governmental stakeholders.

Department of Education

[U.S. Department of Education Announces Incoming Trump-Vance Senior Appointees](#)

January 23, 2025

See link above for all Senior Appointees and their bios.

[ED, HHS, and GSA Announce Additional Measures to End Anti-Semitic Harassment on College Campuses](#)

Press Release

March 3, 2025

Measures will include a comprehensive review of federal contracts and grants given to institutions of higher education that are being investigated for dereliction of duties to curb or combat anti-Semitism violence and harassment

[Guidance Related to Temporary Pause of Federal Financial Assistance Programs](#)

January 28, 2025

The U.S. Department of Education is currently reviewing the full impact of the memo issued by the Office of Management and Budget on Jan. 27, 2025, to temporarily pause federal financial assistance programs.

Per the memo, the pause does not impact “assistance received directly by individuals.” This includes *Title IV*, HEA funds, which are provided to individual students.

NSF

[NSF Implementation of Recent Executive Orders](#)

Guidance

January 28, 2025

All NSF grantees must comply with these executive orders, and any other relevant executive orders issued, by ceasing all non-compliant grant and award activities. Executive orders are posted at [whitehouse.gov/presidential-actions](https://www.whitehouse.gov/presidential-actions). In particular, this may include, but is not limited to conferences, trainings, workshops, considerations for staffing and participant selection, and any other grant activity that uses or promotes the use of diversity, equity, inclusion and accessibility (DEIA) principles and frameworks or violates federal anti-discrimination laws.

Department of Energy

[Memorandum for Heads of Departmental Elements](#)

Memo

January 20, 2025

effective immediately and until further notice, prior to any actions or decisions on all herein described activities, a review under varying criteria will be undertaken to ensure all such actions are consistent with current Administration policies and priorities, including budgetary priorities. The broad spectrum of actions include but are not limited to: personnel actions; awarding of grants, loans, funding opportunities, and cost sharing agreements; contracting, procurement announcements, and actions; rulings, decisions or other actions on any applications, enforcement action, or settlements of any contested matter; submissions to the Federal Register for publication; and the publication or announcement of reports, studies, congressional correspondence, and public statements. This includes all studies or reports that are either ongoing, set to be released, are already under review, or have not yet begun.

[Update to PIER Program](#)

Notice

January 27, 2025

Diversity, equity, and inclusion (DEI) policies, procedures, programs, activities, and reviews involving or relating to DEI objectives and principles until further notice; Requiring, using, or enforcing Community Benefits Plans (CBP); and; Requiring, using, or enforcing Justice40 requirements, conditions, or principles in any loans, loan guarantees, grants, cost sharing agreements, funding opportunity announcements, contracts, contract awards, or any other source of financial assistance

[PF 2025-16 Rescission of DEI, CBP, and Justice40 Policy Flashes, Acquisition Letters, and Financial Assistance Letters](#)

Memo

Effective immediately, DOE guidance issued through the following Policy Flashes is rescinded

- 2022-13 Coding of Justice40 Relevance Categories in STRIPES
- 2022-42 Increasing Opportunities for New Entrants in DOE Acquisitions
- 2023-01 Increasing New Entrants from Underserved Communities and Advancing Equity in Department of Energy (DOE) Management and Operating (M&O) and Major Site and Facility Subcontracts
- 2024-16 (FAL 2024-02) Use of Community Benefits Plan (CBP) in Financial Assistance Programs, Funding Opportunity Announcements and Awards

- 2024-28 Revisions to the Diversity Plan, Acquisition Guide Chapter 70.2671

The following Acquisition Letters and Financial Assistance Letters are rescinded:

- AL-2023-01 Increasing New Entrants from Underserved Communities and Advancing Equity in Department of Energy (DOE) Management and Operating (M&O) and Major Site and Facility Subcontracts
- FAL-2024-02 Use of Community Benefits Plan (CBP) in Financial Assistance Programs, Funding Opportunity Announcements and Awards

Any terms and conditions identified in the guidance shall no longer be used.

USAID

[Notice of Implementation of Executive Order on *Reevaluating and Realigning United States Foreign Aid*](#)

Notice

January 24, 2025

Effectively immediately, Contracting and Agreement Officers must not modify, extend, or exercise options or renewals for existing awards beyond the actions authorized below. Contracting and Agreement Officers shall immediately issue stop-work orders, amend, or suspend existing awards, consistent with the terms and conditions of the relevant award. Following a review, Contracting and Agreement Officers will communicate decisions related to whether an award will be continued, modified, or terminated with impacted contractors and recipients. In addition, Contracting and Agreement Officers must not issue new awards or release any new requests for proposals (RFPs), requests for application (RFAs), notices of funding opportunities (NOFOs), or any other kind of solicitation or request for foreign assistance funding until each activity has been reviewed and approved as consistent with the President's policy.

State Department

State Department Responses to America First Policy Executive Order

Notices and Resources

[Implementing the President's Executive Order on *Reevaluating and Realigning United States Foreign Aid*](#)

[Wicker warns of health outcome from US cuts in foreign aid](#), February 27, 2025 (*log-in required*)

[Foreign Aid Freeze Under Fire](#), March 3rd (*log-in required*)

- A little over a month into what was initially described as a 90-day pause on foreign aid spending to review the merits of the State Department and U.S. Agency for International Development's wide-ranging international assistance portfolios, the Trump administration disclosed last week that it has decided to cancel nearly 10,000 foreign aid awards.

- The disclosure came in a [status report](#) issued in the U.S. District Court for the District of Columbia as part of a lawsuit brought against the administration by foreign aid contractors over the funding freeze. The administration said in the report that Secretary of State [Marco Rubio](#) had completed the review of foreign assistance spending under State and USAID.
- The administration decided to cancel nearly 5,800 USAID awards and to retain just 500 of them, according to the status report. That leaves less than 8 percent of USAID's original awards at the start of the Trump administration still standing.
- The administration also said it decided to end approximately 4,100 foreign aid awards in the State Department and to retain roughly 2,700 of them. Rachel Oswald has more details [here](#).

[Global Health Council v. Donald Trump](#)