

This document contains answers to additional key questions about the [2022 NASA SBIR and STTR Phase I solicitations](#) asked (but not answered) during the [Dissecting the Solicitations webinar on January 20, 2022](#). If you are looking for questions on a specific topic (TABAs, I-Corps, etc.), we encourage you to word search this document to ensure you read all pertinent answers. If you are looking for answers to questions addressed during the webinar, please refer to the presentation and recording available on our [website](#). The webinar and any associated materials are intended to help you navigate, read, understand, and respond to the solicitations; they are not official procurement guidance/instructions.

It is your responsibility to read and understand the solicitations in their entirety, and to develop and submit your proposal in accordance with the requirements and instructions contained therein.

Can we submit SBIR/STTR proposals to multiple agencies?

Yes, you can submit a proposal to multiple agencies; however, it is unlawful to enter into contracts or grants for essentially equivalent efforts. Please read each solicitation carefully to understand any requirements each agency may have relevant to submitting similar or duplicative proposals. Although NASA does not require notification at the time of proposal, if your proposal is selected for negotiation, you must certify that you have not and will not have essential equivalent work funded by any other agency.

Is a firm prevented from getting multiple Phase I awards on the same topic if it submits multiple proposals that are substantially different?

An Offeror may submit more than one unique proposal to the same subtopic; however, an Offeror shall not submit the same (or substantially equivalent) proposal to more than one subtopic. Submitting substantially equivalent proposals to several subtopics may result in the rejection of all such proposals.

How is the resulting intellectual property treated?

The small business retains title and ownership of all SBIR/STTR data it develops or generates in the performance of an SBIR/STTR award. The government receives a limited nonexclusive license to use, but not disclose, that data. This nondisclosure obligation is accompanied by a 20-year Data Rights protection period. Click [here](#) for more information.

If we receive an award for a specific purpose, are we permitted to then commercialize it for a different need in the market?

Yes. NASA does not restrict your ability to commercialize your technology for any purpose; however, some technologies are subject to export controls and it is your responsibility to understand and adhere to all relevant U.S. laws and regulations.

Can SBIR/STTR funding be used for innovative startups used on Earth, who also want to expand to Space?

Yes. Many SBIR/STTR technologies are relevant to both Earth and Space.

If we have a finished prototype, but it hasn't been tested (and therefore, there is no data to prove efficacy), may we still apply for Phase I?

Refer to the subtopics and determine if the innovation fits the requirements. In some cases, there may be an opportunity to take an existing prototype and conduct proof of concept or feasibility work.

Are you accessible for general questions during the communications blackout period?

To ensure fairness, questions relating to the intent and/or content of research subtopics in the solicitations cannot be addressed during the open solicitation period. Only questions requesting clarification of how to submit your proposal package and other administrative matters will be addressed. We recommend contacting the NASA SBIR/STTR program Helpdesk with these questions at sbir@reisystems.com as soon as possible.

Communications and dialogue with industry regarding other technical work or other points of mutual concern not related to the open solicitations or proposals to be submitted thereunder are not restricted and are encouraged. These include:

- Limited communications between Technical Monitors (TMs) and Contracting Officer's Representatives (CORs) specifically regarding the technical performance and progress of current ongoing contracts;
- Attending company debriefs and meetings to be familiar with technology developments under current and ongoing contracts; and
- Communications regarding needs, utilization, infusion, and commercialization. Examples include:
 - Discussions about use of NASA facilities;
 - I-Corps customer discovery interviews;
 - Technology infusion planning; and
 - Facilitation of SBIR/STTR technology commercialization.

How do we find NASA scientists/engineer contact information to engage in dialogue *outside of the blackout period*? Is there any way to get feedback from NASA regarding the fit of our technology to a research topic/focus area?

Center Technology Transition Leads (CTTLs) are a vital resource for prospective and current SBIR/STTR participants. They may be able to answer your questions or connect you with other NASA experts. You can find contact information for CTTLs [here](#).

To determine which CTTL to contact, you may choose (1) the center geographically closest to you or (2) the center(s) most closely associated with your technology, as each solicitation subtopic includes lead and participating centers. Once you've determined the center(s) of interest, you can reach out to those CTTLs.

As a reminder, all NASA personnel are prohibited from addressing solicitation-specific questions during the solicitation open period.

Our NASA partner would like to have details on what they need to do to be the sponsor.

NASA personnel are prohibited from sponsoring an SBIR/STTR proposal. If your proposal is selected for negotiations, you will be assigned a NASA Technical Monitor at Phase I or a Contracting Officer's Representative (COR) at Phase II at the time of award.

Is there a minimum length of time a business must have been in existence before submitting a proposal? Are sole proprietorships allowed or must it be a more formal entity?

You must qualify as a Small Business Concern (SBC) as defined by SBA regulations at 13 C.F.R. § § 701-705 to receive an award. There is no minimum length of time a business must have been in existence and individual proprietorships that otherwise meet the criteria are eligible.

Does non-use of TABA and I-Corps reduce chance of award vs. another proposal which does use them?

No. TABA and I-Corps requests are not considered during evaluation of your proposal.

If you win an SBIR and an STTR, can you get TABA funding for both?

Yes. You may request TABA for each award.

Can the TABA vendor be a non-profit, or possibly a college group?

All TABA vendors must be a legal business in the United States. NASA will review the U.S. Government-wide System for Award Management (SAM) excluded parties list to ensure the proposed TABA vendor can receive Federal funds.

Do TABA vendors need to be approved before proposal submission?

No. NASA will review your request for TABA funding—including information about the existence and capabilities of the proposed vendor—if the completed proposal package is selected for a Phase I award.

Section 1.7 of the SBIR solicitation suggests up to \$10,000 in funding can be provided for I-Corps. Should billings be separated for the I-Corps effort or is that amount added to the Phase I funding?

I-Corps funding is provided as a training grant, separate from your Phase I contract.

Is time involved in I-Corps billable to SBIR/STTR contract?

No. The training grant that is provided is to cover the costs to participate in the program.

Should I-Corps progress be referenced in status reports?

Reporting requirements related to I-Corps would be detailed in the associated training grant, separate from your Phase I contract. However, to the extent that the results of your I-Corps progress are relevant to the reports you submit under your Phase I contract, you may elect to include it.

Are we allowed to pay staff with awarded funds or just use for the project?

Salaries and wages of your employees are allowed by the Federal Acquisition Regulation (FAR) and all SBIR/STTR agencies, so your cost proposal should show a reasonable number of hours and compensation for each person who is contributing to the research and development (R&D).

Can we factor costs from the \$150K to pay for employees during the waiting period between SBIR Phase I and SBIR Phase II (i.e., once we are done with Phase I and until Phase II award decision is made)?

No. The Phase I proposal should include only those costs directly allocable to the Phase I effort. If you submit a Phase II proposal and it is selected, you will negotiate a separate contract from your Phase I. NASA is not responsible for any monies expended by the firm before award of any contract.

Is there a guide available for budgeting and deciding on appropriate rate (and to buffer for unexpected expenses)?

Offerors with questions about the appropriate classification of costs and development of indirect rates are advised to consult with an accountant who has experience in government contracting and cost accounting principles. The U.S. Small Business Administration (SBA) also has resources available on accounting and finance, including this tutorial titled [“FAQ Regarding Budgeting Basics.”](#)

Is there a limit on subcontracting cost?

Yes. Subcontracting limits are expressed in the solicitations as percentages of total cost. You calculate the percentages by the total cost of the proposed subcontracting effort, to include the appropriate overhead (OH) and general and administrative expenses (G&A), in comparison to the total effort funded by the government (total contract price including cost sharing, if any, less profit, if any).

For an SBIR, the small business must do 67% of the work. Is that 67% of the labor hours or 67% of the total funds?

Subcontracting limits are expressed in the solicitations as percentages of total cost. For SBIR, the proposed subcontracted business arrangements, including consultants, must not exceed 33 percent of the research and/or analytical work [as determined by the total cost of the proposed

subcontracting effort, to include the appropriate overhead (OH) and general and administrative expenses (G&A), in comparison to the total effort funded by the government (total contract price including cost sharing, if any, less profit, if any)].

The allowability / limitations of 1099 / contract employees in the small business portion of the budget is not clear to me.

In most cases, these individuals may be considered subcontractors or consultants and would be held to the subcontract/consultant limitations since they are not full-time employees of the proposing small business.

What is the process for incorporating consultants who have their own U.S. LLC entities? That is, they bill through their own LLC and want to participate in our SBIR effort as a Subject Matter Expert.

Use of Subcontractors and Consultants is addressed in Chapter 3.5.3.4 of the solicitations.

What Technology Readiness Level (TRL) is expected before a company submits its first SBIR proposal?

Phase I typically covers research and development across TRLs 1-3. Each subtopic writeup includes expectations related to Phase I research results and expected TRL range at the completion of the project.

Is Phase I appropriate for an unsolved additive piece to a new, novel, and needed technology that is TRL 7?

Phase I typically covers research and development across TRLs 1-3. Each subtopic writeup includes expectations related to Phase I research results and expected TRL range at the completion of the project. You would need to determine if the unsolved additive piece fits the requirements of the subtopic to determine if this is an option.

What recommendations do you have for solo founders with ideas but see reaching the required technical depth of an SBIR in six months insurmountable?

Related question: If our R&D team has less experience or is unconventional, what things can we do to overcome that disadvantage?

Related question: Do you have any advice for younger proposers? What can we do to demonstrate competency?

Some opportunities you may consider are:

- Joint ventures or limited partnerships (provided the entity created qualifies as an SBC)
- Partnering with a Research Institution on an STTR proposal
- Subcontracting to more experienced firms
- The [NASA Mentor-Protégé Program](#)

Are there any benefits or resources for veteran-owned businesses?

SBA offers [support for veteran business owners](#) in the form of training, loan programs, and assistance accessing federal contracting programs like SBIR/STTR.

Can I partner with a university on an SBIR topic?

Universities, or university personnel, may be subcontractors on SBIR proposals. The subcontractor arrangement is different from the formal partnership that is a requirement of STTR; please refer to the appropriate solicitation for more information.

If a small business wants to submit for an STTR, what qualifies as a research institution?

The research institution must be owned and operated exclusively for scientific or educational purposes, non-profit, and located in the United States. Research institutions eligible to participate in the STTR program include nonprofit colleges or universities, domestic non-profit scientific/research organizations, and Federally Funded R&D Centers (FFRDC).

Can an FFRDC partner with a small business to submit as either an STTR or SBIR?

For SBIR, a FFRDC may be a subcontractor to a small business. For STTR, an FFRDC would qualify as the partnering research institution necessary to propose to the solicitation.

If we hire someone that would be a better candidate for Principal Investigator (PI) for a project, can the PI be changed between the proposal and the negotiated contract?

It is possible; however, any changes made to a NASA contract will require approval of the Contracting Officer and the NASA SBIR/STTR Program Office.

Is it possible to put together a R&D team and PI contingent on winning the award? In other words, can a team be put together ad hoc “on paper” and then actually come together to do the project if funding is secured?

Offerors are required to register with [SAM](#) prior to submitting a completed proposal package. To be eligible for SBIR/STTR awards, the firm must be registered under the applicable North American Industry Classification System (NAICS) codes for the Phase I and II awards (codes 541713 or 541715). Offerors without an active SAM registration by the due date for a completed proposal package will be ineligible for award.

Regarding personnel, the qualifications of the proposed Principal Investigators/Project Managers, supporting staff, and consultants/subcontractors, if any, will be evaluated for consistency with the research effort and their degree of commitment and availability.

Do employees, contractors, or subcontractors that would be performing the work have to be U.S. citizens, or can they be Green Card holders? How about non-U.S. citizens who are authorized to work in the U.S.? How about using someone overseas who is not U.S. citizen?

All work must be performed in the United States. Offerors are responsible for ensuring that all employees who will work on the contract are eligible to work in the United States and, if applicable, under export control and International Traffic in Arms (ITAR) regulations. Any employee who is not a U.S. citizen or a permanent resident may be restricted from working on the contract if the technology is restricted under export control and ITAR regulations unless the prior approval of the Department of State or the Department of Commerce is obtained via a technical assistance agreement or an export license. Violations of these regulations can result in criminal or civil penalties.

Are prototype deliverables preferable over research-based deliverables?

Each subtopic writeup includes expectations related to desired deliverables at Phase I and II. Phase I typically requires research-based reports with a prototype being delivered at Phase II.

How long after Phase I can Phase II be pursued? For example, if we get Phase I in 2022, could Phase II be pursued at a later time, say, 2024?

Phase I awardees will receive instructions to submit their Phase II proposals near the end of their Phase I contract period of performance. You are only eligible to submit a follow-on Phase II proposal during this time, not during a subsequent cycle.

How much emphasis is placed on "past performance" or "qualifications" in the selection process and, thus, should applicants highlight past performance and qualifications in their applications?

As detailed in Chapter 4 of the solicitations, there are four technical evaluation criteria: (1) Scientific /Technical Merit and Feasibility, (2) Experience, Qualifications, and Facilities, (3) Effectiveness of the Proposed Work Plan, and (4) Commercial Potential. The overall Technical Merit score (Factors 1, 2 and 3) is significantly more important than the Commercial Potential rating (Factor 4).

For proposals that are recommended for negotiations after technical evaluation and prioritization, the Contracting Officer will advise the Source Selection Official on matters pertaining to cost reasonableness, responsibility, and known past performance issues.