

EPSCoR International Space Station (ISS) Flight Opportunity and Suborbital Flight Opportunity  
NNH21ZHA001C

Frequently Asked Questions

*As of January 08, 2021*

Below questions apply ONLY to Amendment #3 “Suborbital Flight Opportunity”

Q1: Proposers are supposed to include a quote for flight services from a commercial vendor as specified in “Proposal Section 6”. The first sentence in section 2.4.1 states “The proposer’s organization will directly purchase the proposed flight(s) on a currently available U.S. commercial vehicle.” This sentence implies that the total funding for the award to the science institution should be “science cost” + “flight service cost”. *Is this true?*

A1: Yes, the flight service cost is considered a subaward in the proposed budget. The total funding for the award will be the rolled-up sum of the flight provider cost (capped by allowable number of flights) and the research cost (capped at \$200k, includes F&A).  
*[Added December 16, 2020]*

Q2: If the total science institution budget is supposed to be “science cost” + “flight service cost” so the “proposer’s organization can directly purchase flights”, then the “science cost” will need to be \$200,000 + (indirect cost percentage \* “flight service cost”). Typical institution indirect cost percentage is 40% to 60%, so the cost for the “proposer’s organization to purchase the flight” could be hundreds of thousands in addition to the \$200,000 and the flight service cost. *Who will be paying for the institution IDC on flight services? NASA EPSCoR or STMD? Should these IDC costs be included in section 6 or the institution budget?*

A2: The flight service cost is considered a subaward in the institution budget and the flight service provider needs to be called out by name in the proposal. Subawards fall under Modified Total Direct Cost (MTDC) according to Title 2 of the Code of Federal Regulations Part 200 (2 CFR 200), and the MTDC is the amount of direct costs on an award to which indirect (F&A) costs may be applied. The definition of MTDC stipulates that only the first \$25,000 of each subaward can be counted towards MTDC to calculate indirect (F&A) cost. Also see:  
<https://ecfr.federalregister.gov/current/title-2/subtitle-A/chapter-II/part-200>  
*[Added December 16, 2020]*

Q3: For the “proposer’s institution to directly purchase the proposed flights”, the cost of the flight service and the associated IDC will need to be included in the proposer’s budget and approved by the institution. Purchases in excess of \$50,000 can be particularly problematic and state rules governing such purchases generally require a full bid process and approval of state auditors. This can result in a delay of many months before the flight support vendor can be brought online. While every effort will be made to minimize the impact of such a major delay on the flight schedule, it is possible that additional support for science personnel will be needed to fulfill the flight objectives. Will additional funding be provided to support the science team in the event that the NASA requirement for the “proposer’s institution to directly purchase the proposed flights” result in excessive delays in the flight schedule?

A3: [The flight provider should be mentioned by name in the proposal as a subaward. In many cases, this has relaxed the requirement for an open bid process, and thus no flight schedule delays are expected to be incurred.](#)

*[Added December 16, 2020]*

Q4: Finally, SMD offers suborbital flight services, but these are NASA provided services and not commercial services. Since SMD provides suborbital flights “free of charge” to the science PI if the science project is accepted by NASA, the kinds of details required in Section 6 might or might not be available. What is the acceptable substitute for section 6 if the appropriate SMD suborbital service agrees to support the science project?

A4: [This solicitation limits proposers to only propose commercial suborbital flight services. NASA provided suborbital flight services are not allowed.](#)

*[Added December 16, 2020]*

Q5: Even if the services can be purchased as a subaward, that still leaves the F&A on the subaward. Should this extra F&A be included in the Flight Services quote so that it is not an unfair tax to the science funding?

A5: [The indirect F&A cost charged on subawards should not be included in the flight quote itself but shall be included in the research budget which is capped at \\$200k.](#)

*[Added December 16, 2020]*

Q6: We are considering limited use of animals (frogs and mice) in our experiments. It would be one of each animal per flight and they would be sacrificed immediately before the flight to obtain a nerve-muscle electrophysiological preparation. For most animal use approvals, the standard procedure is to get IACUC approval only after a proposal is selected for funding. But IACUC needs to know that the funding agency allows this "just in time" approach. Such allowance is typically explicitly stated in the RFP, but it does not

appear to be in this one - probably because the main ISS RFP does not allow the use of any animals and the Appendix RFP did not anticipate or address this possibility. I will need an explicit statement from NASA saying IACUC approval is only required upon funding for routing. Conversely, if the restriction on use of animals on the ISS extends to the Appendix 3 RFP I would need to know that.

A6: Payload accommodation requirements for animal test subjects are determined by the flight provider. It is the responsibility of the proposer to provide Institutional Animal Care and Use Committee (IACUC) approval before the flight according to the schedule provided by the Flight Service Provider. IACUC approval is only required after a proposal is selected for funding.

*[Added January 08, 2021]*