



Lower-Tier Subcontracting Dollars

Richard Mann
Program Manager
NASA Office of Small Business Programs
November 20, 2019

Lower-Tier Dollars

- Allows prime contractors to count dollars awarded to small business subcontractors at lower tiers towards their goals
- Authorized by 2014 NDAA
- SBA regulation (2016) interpretation
 - Must have two different sets of goals
 - One set of goals for top tier
 - One set for all lower tiers
 - For NASA this means 4 sets of goals
 - eSRS not configured

4 Sets of Goals?

Top Tier Goals, Percent of Total Contract Value	Lower Tier Goals, Percent of Total Contract Value
Top Tier Goals, Percent of Total Subcontracting Dollars	Lower Tier Goals, Percent of Total Subcontracting Dollars

Lower-Tier Dollars

- Proposed FAR Rule designed to match SBA Regs – issued June 2019
- Comment Period
 - More Work for Government and Industry
 - eSRS not configured
- OSDBU Meeting September 2019
 - Senate & House Small Business Committee staffers
 - SBA Interpretation different from that intended by Congress
 - NDAA 2020 to clarify that 2 sets of goals not required
 - SBA Regs, FAR rule would need revision
- Recommended Goals in Solicitations should account for lower-tier subcontracting if put in FAR

Questions?