National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 25, 2015

Reply to Attn of: Office of the Chief Financial Officer

Mr. Ali Zaidi
Program Associate Director
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Zaidi:

Pursuant to OMB Circular A-11, Section 124.2, NASA is hereby submitting a revised shutdown plan in the event of a lapse in appropriations, updating the plan submitted to OMB on September 27, 2013. In this plan, NASA continues to require each NASA Center to provide for protection of life and property.

The decision on what personnel should be excepted from furlough is very fact-specific, and Directors in charge of NASA Centers are in the best position to make detailed decisions regarding the suspension of ongoing, regular functions which could imminently threaten the safety of human life or the protection of property.

Factors that influence the determination of excepted personnel and activities include: (a) the hazardous character of certain NASA operations; (b) the threat to property involved in failure to provide the minimum level of security, safety, and reliability; (c) the preservation of Government assets, for example, orbiting spacecraft including the International Space Station (ISS), requiring regular and frequent attention; and (d) the safety of human life. For an estimate of the numbers of excepted personnel, please see Attachment A.

NASA has published guidelines for Center Directors to follow in determining the minimum number of persons who may be excepted from a furlough. Specifically, NASA has instructed the Center Directors to carefully construe the available exceptions in determining which activities can continue; and then except from the furlough only those employees who contribute directly to those activities. All other employees would be furloughed immediately after an orderly shutdown.[1] Employees furloughed would be informed that NASA cannot promise that they will be paid for the period during which they are on furlough. Pay for these days would depend on future appropriations.

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[1] In the most recent shutdown, an orderly shutdown was commenced for activities under all of NASA's accounts immediately following the lapse in appropriations on September 30, 2013. However, NASA will carefully evaluate the circumstances of each anticipated shutdown in view of the available funds when determining the date for commencing orderly shutdown of non-excepted activities for each account.

Attachment A identifies those employees NASA expects to except from any furlough and the justification for their exception. Because not all excepted services are required to be performed full-time, the excepted personnel requirements are presented in three categories:

- Full-time personnel – individuals whose presence is required each workday.
- Intermittently required individuals – individuals whose presence is required only for the duration of specific, named activities.
- On-call personnel – individuals who may be required to work (at home or in the office) to respond to emergency needs.

Specific Exceptions and Criteria

NASA's plan recognizes that the excepted activities include the following:

- Space launch hardware processing activities, which are necessary to prevent harm to life or property.
- Tracking, operation, and support of the ISS and operating satellites necessary for safety and protection of life and property.
- Completion or phase-down of research activities in cases where serious damage to property would result from temporary suspension of the activity.

There are two major operations or classes of operations that would require ongoing support in accordance with the definitions of excepted activities identified above. First, NASA currently is operating the ISS with a crew of six astronauts/cosmonauts, which has been in continuous operation since 1998. To protect the life of the crew as well as the assets themselves, we would continue to support planned operations of the ISS during any funding hiatus.[2] Moreover, NASA will be closely monitoring the impact of an extended shutdown to determine if crew transportation or cargo resupply services are required to mitigate imminent threats to life and property on the ISS or other areas.

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[2] The ISS is a continuous 24 hour, 7 days a week operation with on-orbit and ground control activities critical to protect life and property. A six-person, international crew is resident on orbit, working in a closed life support environment and maintaining operation and control of the large, orbiting national laboratory. Ground-based mission control functions are essential to monitor, maintain, and correct environmental conditions necessary to sustain life on board the spacecraft, and prevent loss of crew during unplanned system events or failures. A daily average of 1,000 commands are prepared, validated, and sent to the ISS from ground controllers to maintain operation. The ISS operates in the hazardous environment of low-Earth orbit populated by micrometeoroids and orbital debris (MMOD). Ground-based mission control functions are essential to monitor MMOD threats, and to analyze, plan and execute debris avoidance maneuvers necessary to prevent loss-of-spacecraft. During the next six months, NASA will be fully engaged in five launches to ISS by the Russian and Japanese space agencies, as well as the expeditious resumption of cargo resupply launches by SpaceX and Orbital ATK. Other time-critical activities including those related to future ISS crew rotation and resupply activities will also continue at their full tempo. All of these activities are necessary to protect life and property.

Second, if a satellite mission is in the operations phase, we will maintain operations that are essential to ensure the safety of that satellite and the data received from it. However, if a satellite mission has not yet been launched, unfunded work will generally be suspended on that project. The extent of support necessary and the time needed to safely suspend project activities will depend on whether any of the activities are of a hazardous nature (e.g., parts of the satellite may need to be cooled[3]).

In each of the above cases, the ISS Programs and missions in operations, critical activities are conducted by closely integrated contractor and civil service workforces as a single unit. Contractor activities will continue through any funding hiatus supporting necessary excepted activities and civil servant workforce essential for the protection of life and property.

As a general rule in applying these guidelines, no new travel or procurement action would proceed without an express determination that it is essential to carrying out the excepted activities outlined above.

Personnel at permanent duty stations overseas would remain at their stations, and excepted personnel on official travel in support of ongoing excepted space operations, such as the ISS, would remain on official travel. All other official travel would be terminated in an orderly manner, with extended temporary duty (ETDY) personnel permitted to remain at their ETDY location and all other personnel returned to their home station.

All possible and prudent steps to minimize the incurrence of costs by contractors (including JPL and its subcontractors), grantees, and partners in cooperative agreements performing excepted activities will be taken.

- New contracts, grants, cooperative agreements, task orders, change orders, and other actions would not be issued during a funding hiatus, except those critical to meeting the requirements for excepted activities under this policy—and then only to the extent and amount necessary to meet those requirements.

- Contract personnel may perform excepted activities, provided all of the requirements governing excepted activities are met. For example, NASA contracts for most emergency services support and installation security services. Contractors may perform these excepted services, but only to the extent necessary.

- Contractor travel associated with excepted activities should occur only on an exception basis, and then only where it cannot be deferred without severe adverse impact on the remaining permissible effort. Supplies that are not immediately needed to carry out the essential operations under this policy, overtime not critical to meeting the tasks still permitted under this policy, and similar costs should not be incurred.

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[3] In some cases, like the upcoming 45-day thermal vacuum test of the James Webb Space Telescope's critical optimal flight hardware, tests will continue unabated as any disruption risks damage to hardware for which there are no spares.

Contractors may continue to perform under contracts for work obligated prior to the shutdown, provided performance does not require the use of shutdown NASA facilities or other Government support which would be funded by a lapsed appropriation, including administrative, oversight or other actions required of civil servants. For example, work on certain missions in development may continue if performance does not require the use of NASA civil servant or technical resources or other Government support. Contractors continuing to work under these circumstances will be instructed to preserve resources and limit contractual expenditures. When contract work on these projects reaches a point at which civil servant participation becomes necessary (e.g., inspections or funding actions), or past which continuation without civil servant participation would be imprudent (e.g., milestones or decision points), contractors will be instructed to suspend performance.

Contractors continuing to work under the provisions above will be instructed to preserve resources and limit contractual expenditures.

- Non-excepted effort to be funded by a lapsed appropriation shall not continue until an appropriation act or Continuing Resolution has been enacted.

Reimbursable activities that protect life and property may continue. Other reimbursable activities may only continue to the extent the full cost is being reimbursed (including increased incremental costs now required for operation under a partial shutdown), and the performance does not require the use of Government support that would be funded in part by a lapsed appropriation. Additionally, Federal reimbursable activities must have confirmation from the funding agency that the work is authorized under the shutdown and funding is available, and non-Federal reimbursable activities must have the full cost paid for in advance.

Activities that would not continue include:

- Educational Support – NASA instructors will not be working in schools.

- Public Access to NASA Centers and Facilities – All tours and public education visits to NASA Centers will be canceled.

- NASA Television/Web site – Citizens will not have televised access to NASA operations and programming or access to the NASA Web site.

During a funding hiatus, NASA would convene an executive committee of each Center Director, the Center Chief Financial Officer, the Agency Chief Financial Officer/Chief Acquisition Officer, and Officials-in-Charge of key Headquarters offices, as necessary, to review the status of NASA's remaining operations and decide if further actions are needed to reduce in-house or contract activity based on the criteria for exceptions discussed above. If so, a minimum number of additional personnel would be recalled to duty to effect any needed changes. In addition, some of those personnel on duty would be authorized to recall others to respond to any contingencies or emergencies that occur during furlough. In all cases, however,

once necessary actions are complete, the recalled personnel would return to a furloughed status.

The estimated time to complete the shutdown for routine Agency activities, which includes the vast majority of NASA employees, contractor employees, and facilities, is less than one-half day. Depending on when a shutdown occurs, certain specific activities, for example equipment tests and research that may be underway at the time of a hiatus, may require longer to conduct an orderly shutdown that eliminates the risk to personnel and preserves the Government property involved.

Sincerely,

David P. Radzanowski
Chief Financial Officer

Enclosure

NASA PLAN - EXCEPTED POSITIONS *(as of August 7, 2015)*

Planned Exceptions:

Center	Strength (Normal Ops)	Personnel Excepted from Furlough*				
		Full Time FTE	Part Time FTE	Total FTE	Part Time Head Count	On Call Head Count
ARC	1,148	43	7	50	21	65
AFRC	560	18	1	19	2	46
GRC	1,556	0	7	7	20	59
GSFC	3,223	58	18	76	39	169
HQ *(incl. NSSC,OIG)*	1,467	17	13	30	58	105
JSC	3,057	111	49	160	108	332
KSC	1,989	1	40	41	59	167
LaRC	1,861	7	5	12	16	157
MSFC	2,356	39	12	51	37	234
SSC	307	1	2	3	8	41
Total	**17524**	**295**	**154**	**449**	**368**	**1375**

Justification:

Protection of Life and Property*		Funded by Other than Lapsed Appropriation	
Total FTE	Headcount (Full & Part Time)	Total FTE	Headcount (Full & Part Time)
50	64	0	0
19	20	0	0
7	20	0	0
76	97	0	0
28	73	2	2
158	214	2	5
41	60	0	0
12	23	0	0
45	70	6	6
3	9	0	0
439	**650**	**10**	**13**

** Rounded for partial FTEs*