

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



March 7, 2016

Reply to Attn of:

CC-A

TO: All NASA Employees

FROM: AA-B/Associate Director

SUBJECT: Determination Regarding Attendance by NASA Employees at the Orbital ATK and United Launch Alliance (ULA) OA-6 Commercial Resupply Service (CRS) Mission Launch Events, March 21 - 22, 2016

On or around March 22, 2016, Orbital ATK, Inc. is scheduled to launch the Orbital ATK OA-6 CRS Mission on a ULA Atlas V launch vehicle from Cape Canaveral Air Force Station in Cape Canaveral, Florida. In support of the launch, Orbital ATK and ULA will sponsor an evening reception on March 21, 2016, from 6:00 p.m. to 8:00 p.m. at Milliken's Reef, in Cape Canaveral, Florida. They will also sponsor a launch viewing reception at the NASA's Kennedy Space Center Operations Support Building (OSB) II from 4:00 p.m. to 9:00 p.m. on the day of the launch, March 22, 2016.

Approximately 900 guests have been invited to these events. These guests include members of Congress, congressional staff, NASA and other Federal agency personnel, state and local government officials, and representatives from industry and academia. The sponsors permit NASA invitees to bring one guest. The value of the events, which includes all food and refreshments, will be approximately \$38 a person at Milliken's Reef and \$15 a person at OSB II.

In accordance with 5 C.F.R. § 2635.204(g), Widely Attended Gatherings and Other Events, I find these events meet the requirements of a *widely attended gathering*, and I further determine that there is an Agency interest in having NASA personnel attend these events because their attendance will further agency programs and operations. Specifically, these events will provide NASA employees a forum to disseminate information on the International Space Station and NASA's other ongoing activities and to discuss matters of interest to NASA with a diverse group of fellow attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance to these events for themselves and a guest.

However, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties or administration of Space Act agreements, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in the event through Ethics Counsel. Moreover, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may only attend if they reimburse the sponsor the value of the events and any gift items accepted for themselves and an accompanying guest. An honor basket will be available for reimbursement.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion, and no more than \$50 from one source in a calendar year. We understand that Orbital ATK will be distributing a gift bag valued at \$10.28. The gift bag includes a blue bag (value of \$2.75) that contains an OA-6 CRS mission patch (value of \$1.98), a decal (value of \$2.20), and mission lapel pin (value of \$3.35). ULA will be distributing a decal, magnet, and mission overview brochure (value of \$2.02). Orbital ATK is offering the gift bags to all attendees; therefore, you or your guest (but not both) may accept only one gift bag as long as doing so would not violate the rule against accepting more than \$50 in gifts from one source in a calendar year.

A handwritten signature in blue ink, appearing to read "Kelvin Manning". The signature is stylized and fluid, with a large loop at the end of the last name.

Kelvin Manning
Agency Designee