



National Aeronautics and Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812

August 29, 2016

LS01 (AMM)

Reply to Attn of:

MEMORANDUM FOR RECORD

FROM: LS01/Audrey Robinson

SUBJECT: Approval For NASA Senior Institutional and OSIRIS-ReX
Program Members To Attend the Team Appreciation Celebration
at the Hilton Cocoa Beach Oceanfront Hotel

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Several NASA Senior Institutional and OSIRIS-ReX (Origins Spectral Interpretation Resource Identification Security Regolith Explorer) program team members have been invited to attend the OSIRIS-ReX Team Appreciation Celebration. This event will take place prior to the launch of OSIRIS-ReX from Cape Canaveral on Thursday, September 8, 2016. The team appreciation celebration will be on Tuesday, September 6, 2016, at the Hilton Cocoa Beach Oceanfront Hotel, with a buffet BBQ dinner and soft drinks, and a slide show of the team's activities and accomplishments during the design and development phase of the OSIRIS-ReX. The event is sponsored by the University of Arizona which is a partner with NASA on the OSIRIS-ReX project.

This event will be a widely-attended gathering of Senior Institutional and OSIRIS-ReX program team members from NASA, University of Arizona faculty, aerospace industry representatives, military personnel, members of the Canadian Space Agency, and community members. Food and drinks for the event are valued at \$22.00 per person and approximately 500 people are invited to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g) (2). Each team member is invited to bring a spouse or guest.

Many of the invited NASA Senior Institutional employees and OSIRIS-ReX program team members have duties on the OSIRIS-ReX team which is associated with the University of Arizona, the sponsor of this event. These employees are similarly situated in that they each have institutional and/or program responsibilities for NASA that involve the OSIRIS-ReX and the University of Arizona. I have determined that attendance of these NASA Senior Institutional employees and OSIRIS-ReX program team members at this event is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with the academic and scientific community, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the Agency in having these Senior Institutional employees and employees who have program responsibilities on the OSIRIS-ReX program attend this event outweighs any concern that the free attendance may or may appear to improperly influence them in the performance of their duties. Attendance of NASA Senior Institutional employees and employees with OSIRIS-ReX program responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations.

Accordingly, NASA Senior Institutional employees and employees on the OSIRIS-ReX team may accept free attendance for themselves and their spouse or guest.

The University of Arizona is a lobbying organization and is registered as such under the Lobbying Disclosure Act. As such NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the \$22 cost of the reception for themselves and their spouse or guest.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.



Audrey Robinson
Chief Counsel