National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

March 20, 2012

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS) luncheon on March 21, 2012

On March 21, 2012, the American Institute of Aeronautics and Astronautics (AIAA), National Capital Section (NCS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host its March luncheon featuring guest speaker NASA Associate Administrator for Human Exploration and Operations Mission Directorate William H. Gerstenmaier.

The luncheon will take place at Pier 7 Channel Inn, 650 Water Street, S.W., Washington, D.C., from 11:30 am to 1:30 pm. Approximately 60-80 people are expected to attend. The estimated cost of the event including all food and beverages is $20.00 per person. The event will be attended by State and local officials, representatives of the aerospace industry, non-profit organizations, academia, professional society members, astronauts, NASA personnel, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will provide NASA attendees with the opportunity to discuss science and exploration related issues with other guests. Accordingly, NASA employees including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone