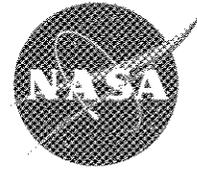


National Aeronautics and
Space Administration

Headquarters

Washington, DC 20546-0001



March 11, 2009

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance "Project Management for Defense"
Seminar hosted by Institute for Defense and Government Advancement
March 30 to April 1, 2009

From March 30 to April 1, 2009, the Institute for Defense and Government Advancement (IDGA) is sponsoring a substantive seminar or conference on program management, entitled "Project Management for Defense." IDGA has tendered as many as five free invitations to Innovative Partnerships Program Office, HQ NASA. NASA would select the individuals. Dr. Barry E. Jacobs, GSFC, NASA is a listed speaker. The listed cost of attending the event ranges from \$799 for early registration to \$1499 for payment after February 27, 2009. Dr. Jacobs may attend at no cost for the day of his talk, or he may accept under this WAG determination, attendance at no cost for the entire seminar.

IPP has justified the NASA interest in attending this seminar as follows. In addition to a range of traditional technology transfer efforts, there are specific project management programs that IPP is involved in, such as the SEED fund project leveraging IPP resources with other NASA offices as well as third parties for mutual technology objectives; the Centennial Challenge program for advancing technology objectives through prize competition, etc. IPP also has the responsibility for the agency in the SBIR and STTR programs.

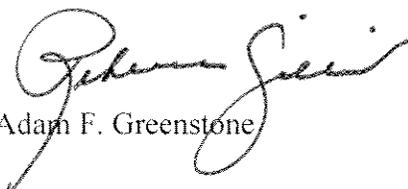
One of the sessions will be "Large Scale Project Management: Electronic Handbooks" that will be given by Dr. Barry Jacobs, NASA GSFC. Within that presentation will be the NASA SBIR program. Two individuals from IPP, Carl Ray and Mike Battaglia, are the program managers for NASA's SBIR program, and would benefit from this training and interaction with outside agencies and persons. Another segment is on strategic planning and within that, facilitating teambuilding. The Innovative Partnerships Program has at its essence the establishment of partnerships: with industry, academia, and other federal research agencies most certainly including DOD. Another area touching on partnerships during the forum is a presentation on "Partnerships and Opportunities;" again, with Innovative Partnerships Program, technology development/technology transfer partnerships are at the essence of our mandate and mission. Furthermore, several individuals have joined IPP recently, and their

participation in this forum would provide a useful overview on project and program development and evaluation that will help them with Agency operations, goals and objectives.

IDGA estimates that approximately 200 to 250 persons will attend. I find that this entire event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I have used the higher late registration costs in making the following determination.

I 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 allow attendees to obtain information on NASA programs and priorities, and permit NASA employees to obtain continuing professional education at no cost. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of its member may accept an invitation for free attendance to the event for themselves and their invited spouses or guests. As noted, Dr. Jacobs may accept either the day of attendance per his speaking, or may accept free attendance at the entire event, per the original invitation.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, or who are in non-career positions for which the President's Executive Order of January 21, 2009, requires signing an ethics pledge, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


for Adam F. Greenstone