National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

September 9, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Women in Aerospace 24th Annual Awards Ceremony and Banquet in Washington, DC, on October 27, 2009

The Women in Aerospace (WIA) will hold its 24th Annual Awards Ceremony and Banquet at 6:30 p.m., on October 27, 2009 at the National Press Club, in Washington, DC. WIA is a non-profit organization dedicated to expanding women's opportunities for leadership and increasing their visibility in the aerospace community. It is composed of representatives from industry, Government, educational institutions, and private individuals. The purpose of this event is to recognize the achievements of women who have made significant contributions in the aerospace field.

The event will be attended by representatives of industry, academia, non-profits, Government, and Congressional staffers. The cost of attendance is $95 per person for Government employees, $150 for WIA members, and $200 for all other attendees. Approximately 300 people are expected to attend the event. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I have determined that free attendance of NASA employees is in the best interests of the Agency because it will further NASA programs and operations. The event will provide an opportunity for NASA officials to discuss the NASA Vision for Space Exploration and the Agency's programs with other attendees. Additionally, WIA has indicated that senior NASA officials will be recognized for their service.

Accordingly, NASA employees whose duties do not substantially affect WIA or a majority of all of its members including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

Note that some NASA contractors may be providing sponsorship for this event and purchasing tables at which WIA may seat other attendees. To avoid the appearance of a conflict of interest, NASA employees who attend the dinner must ensure that they do not sit at a table sponsored by a contractor with which they are closely and currently involved or expect to be involved within the next few months, i.e., by way of source selection or contract administration duties.

It will be sufficient if invited NASA employees provide the names of such contractors to WIA with their RSVPs and do not sit at the listed companies' tables. (A list of WIA's corporate and non-profit members is included below for your reference. It is likely that some of the event sponsors will be entities found on this list.) Employees do not have to list any and all contractors with whom future contact is possible or contractors with whom they have infrequent contacts on trivial matters. Rather, only contractors with whom they are or will soon be closely involved as described above need be listed. Consequently, it is expected that for most employees, the list of prohibited sources can be kept to a minimum. The final decision on this matter is, of course, left to the employee who has first-hand knowledge of his or her responsibilities.

NASA employees whose duties may substantially affect WIA or a majority of all of its members, such as by way of procurement duties, 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.

Adam F. Greenstone

WIA Members

Ball Aerospace & Technologies Corp.
Booz Allen Hamilton
United Space Alliance
ATK
Lockheed Martin
Northrop Grumman Corporation
The Boeing Company
Aerojet
General Dynamics
Raytheon
The Aerospace Corporation
Arianespace
Computer Science Corporation
Dynamac Corporation
Orbital Sciences Corporation
Pratt & Whitney
Rockwell Collins
SAIC
Wexler & Walker Public Policy Associates