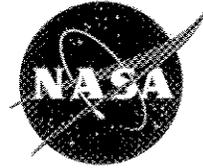


National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



January 25, 2010

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 Project Management Institute (PMI) Reception on February 10, 2010

On February 10, 2010, Project Management Institute (PMI), a non-profit organization under 501(c)(6) of the Internal Revenue Code, will host a reception at the Moody Gardens Hotel, in Galveston, TX., from 5:00p.m.-7:00p.m.

The reception will be attended by representatives of the aerospace industry, trade associations, the media, Congress, academia, and other Federal agencies. Approximately 150 people have been invited and are expected to attend. The estimated cost of the breakfast, which includes all food and beverages, is \$30.00 per person. I find that the PMI 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 reception will allow NASA representatives to speak on areas of interest to NASA, and to discuss NASA's programs and plans and exchange thoughts on the presentations made during the PM Challenge. Accordingly, NASA employees whose duties do not substantially affect PMI or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties may substantially affect the event sponsors, 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge may only attend if they reimburse the sponsor the cost of the reception for themselves and accompanying guests.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone