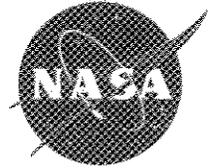


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 23, 2011

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 (WIA) Conference on June 2, 2011

On June 2, 2011, Women In Aerospace (WIA), a non-profit organization under Section 501(c)(3) of the IRS Code, will host a conference at the Key Bridge Marriot Hotel in Arlington, Virginia. This conference will include attendees from the aerospace industry, various government agencies and entities, consulting, academia, and the media. The conference topics focus on space policy and women's career development in aerospace. The event will include a luncheon valued at approximately \$48, as well as a reception where the average cost of refreshments per person will be approximately \$20.

Any Federal Government employee or member of the military may register to attend the conference free of charge on a space available basis. Moreover, WIA has publically advertised the conference on the Internet, with free attendance for government employees indicated at the registration link, and provided a forwarding link on invitation e-mails sent to Government employees. Under these circumstances, attendance without charge at the WIA conference is an opportunity and benefit available to all Federal employees, so that attendance at the conference does not qualify as a gift restricted under Federal ethics regulations. See 5 CFR 2635.203(b)(4).

I note that WIA expects about 200 people from the sectors and organizations noted above. Accordingly, even if the conference constituted a gift under Federal ethics regulations, I find that it would qualify as a widely attended gathering as defined in 5 C.F.R. §2635.204(g)(2) for which NASA employees can accept a gift of free attendance. The event will provide attendees with an opportunity to exchange views on key issues of national space policy and the advancement of women in the U.S. aerospace sector. I also that WIA is not a lobbying organization under the ethics pledge that non-career employees are required to sign, though this finding was not required to reach the results in the advice above.

The above being said, NASA employees whose duties substantially affect WIA, such as by way of procurement duties, should seek an individualized advice from their local ethics counselor.

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

Adam F. Greenstone