National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

June 2, 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 Maryland Business Space Business Roundtable Luncheon Meeting (MSBR) on June 21, 2011

On June 21, 2011, the Maryland Space Business Roundtable (MSBR), a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a luncheon meeting at Martin's Crosswinds, in Greenbelt, MD, at 11:30 AM. The luncheon is to provide attendees with an opportunity for the aerospace community to share views with colleagues.

Approximately 500 people have been invited to attend, including NASA personnel, NOAA personnel, Members of Congress and congressional staff, state and local officials, the media, representatives of the aerospace industry, academia and students, employees of other Federal agencies, and contractors. The estimated cost of the reception, which includes all food and beverages, is $23.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above mentioned reception is in the interest of the Agency because it will further Agency programs and operations. The event will provide NASA employees an opportunity to discuss the mission and other NASA programs with representatives of the communities participating in the reception. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

Moreover, NASA employees whose duties do not substantially affect the event sponsors, 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. However, NASA employees whose duties may substantially affect the event 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