

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



August 11, 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 a Reception hosted by United Space Alliance on August 17, 2011

United Space Alliance is sponsoring a reception at the Johnson Space Center, in Houston, TX, on August 17, 2011, from 6:00 PM – 9:00 PM. The purpose of the event is to celebrate the accomplishments of the Space Shuttle Program.

Approximately 1,000 people are expected to attend this reception. Expected attendees include NASA personnel, USA current and former employees, senior center and program management from the Shuttle Program, and the aerospace industry. The reception will include food and non-alcoholic beverages valued at approximately \$12 per person, with a cash bar. In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the event meets the definition of a “widely attended gathering.”

I further find that there is an agency interest in having NASA employees attend the event, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect United Space Alliance, 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.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend if they reimburse the sponsors the cost of the event for themselves and accompanying guests.

Kathleen T. Spear

Adam F. Greenstone

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