

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 27, 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 Annual Awards Dinner and Ceremony hosted by the Women in Aerospace (WIA) on November 1, 2011

On November 1, 2011, Women In Aerospace (WIA), a non-profit organization under Section 501(c)(6) of the IRS Code, will host the Annual Awards Dinner and ceremony at the Ritz-Carlton, Pentagon City Hotel in Arlington, VA, from 5:30 PM – 9:30 PM. The purpose of this event is to give Women in Aerospace awards to those who have fulfilled the mission of being dedicated to expanding women's opportunities for leadership and increasing their visibility in the aerospace community. Other organizations that support this event include Boeing, Northrop Grumman, Lockheed Martin, Sierra Nevada Corporation, CSC, and Ball Aerospace. As host, however, WIA makes all determinations on seating.

Approximately, 350 people are expected to attend. This event will include attendees from NASA personnel, Members of Congress and Hill staff, the aerospace industry, various government agencies and entities, academia, and the media. The estimated cost of the dinner, which includes all food and beverages, is \$75 per person. I find that this event 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 dinner is in the interest of the Agency because it will further agency programs and operations. Accordingly, 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 for themselves and their accompanying guest.

However, NASA employees whose duties may substantially affect WIA or any other companies supporting the event, 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 receiving an invitation from an organization other than WIA should also seek an individual determination.


Adam F. Greenstone