National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

March 1, 2012

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 Cleveland State University (CSU) Luncheon on March 2, 2012

On March 2, 2012, Cleveland State University (CSU), a public university of the state of Ohio, will host a luncheon at CSU in Cleveland, Ohio at 11:30 a.m. At the event the Honorable John Glenn and Mrs. Annie Glenn with both receive honorary degrees.

The luncheon will be attended by approximately 60 people, including Federal and state elected officials and/or staff, University officials and faculty, various leaders of the local business community who are involved in CSU's public governance through gubernatorial appointment, as well as student and community representatives. The estimated cost of the luncheon, which includes all food and beverages, is $25 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). The event will provide NASA attendees with an opportunity to discuss recent developments in NASA's policies and programs with representatives of the communities participating in the reception while celebrating two individuals who are renowned in NASA's history.

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 President's ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect CSU or its Foundation, 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