

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 5, 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 a Reception and Raytheon Company's Unveiling of "MathAlive" at the Smithsonian's International Gallery on March 7, 2012.

On March 7, 2012, the Smithsonian Institution and the Raytheon Company will sponsor a debut of Raytheon's traveling exhibition entitled, "MathAlive" at the Museum in the S. Dillon Ripley Center in Washington, D.C. The exhibit will run at the Smithsonian for three-months. The purpose of this event is to celebrate the launch of "MathAlive," which will be an interactive experience designed to bring math to life for students and visitors of all ages and backgrounds.

Approximately 750 guests are invited to this event, including Congressional Members and their staff, State and local officials, university math chairs, museum trade representatives, math organizations, Raytheon employees, as well as representatives from FIRST Robotics, MATHCOUNTS, NCTM, and Federal agencies. The estimated cost per person for the reception and dinner is \$36. I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA employees an opportunity to discuss issues of interest to the education and scientific communities, including NASA's current efforts to provide information on science and math education to students and schools, with other attendees.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception themselves.

NASA employees whose duties substantially affect Raytheon, for instance by way of procurement duties, should seek an individual determination 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.

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

Adam F. Greenstone