

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 25, 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 March of Dimes Foundation (MDF) Dinner on April 25, 2012

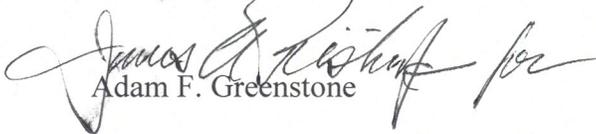
On April 25, 2012, the March of Dimes Foundation (MDF), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will sponsor a dinner at the National Building Museum, in Washington, D.C., at 6:30 p.m. The dinner is to raise money to support research on healthy pregnancy and healthy infants and to support related programs in the National Capital Area.

Approximately 600 people have been invited to attend, including NASA personal, Members of Congress, HHS, supporters, donors and advocates from various sectors of industry (transportation, health, energy, retail), and members of the public. The estimated cost of the dinner, including all food and beverages, is \$115.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

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 event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the sponsor, 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 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