

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 5, 2013

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 BEYA STEM Global Competitive Conference Dinners on February 8 & 9, 2013

On February 8-9, 2013, the Career Communication Group, a minority owned small business that does not employ registered lobbyists, will host the Stars and Stripes Dinner and the Beya Gala at the Marriott Wardman Park Hotel in Washington, D.C., on February 8 & 9, 2013, respectively. The Stars and Stripes dinner will recognize the top African Americans in the Military and the Gala will acknowledge top science, technology, engineering & mathematics (STEM) professionals.

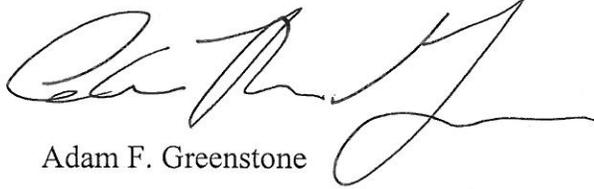
Representatives from academia, the private sector, and government will attend these events. Approximately, 1800 people will attend the Stars and Stripes dinner on February 8, including many of the most senior African-Americans in U.S. military leadership positions. Approximately 2000 people will attend the Beya Gala, where 10 NASA employees will be recognized for their public service. Career Communications Group (CCG) controls the seating for these events and the invitations issued to people to be CCG's guests.

The estimated cost of the refreshments for each event, which includes all food and beverages, is \$75.00 per person. I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend these dinners because attendance will further Agency programs and operations. Attendance at the Stars and Stripes Dinner and the Gala will allow NASA representatives to discuss NASA's programs and plans, including STEM education initiatives with the other attendees who hold significant roles related to STEM initiatives and diversity advancement. Accordingly, NASA employees – including NASA employees in non-career positions required to sign the ethics pledge under Executive Order 13490 – whose duties do not substantially affect CCG may accept an invitation for free attendance at either of these two events for themselves and their invited spouses or guests.

However, NASA employees whose duties do substantially affect CCG such as by way of procurement duties, or who receive an invitation to attend from an organization other than

CCG should seek an individual determination from their local NASA ethics office pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in either of these events.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone