

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 18, 2013

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at Lunches at the Goddard Symposium Conference hosted by the American Astronautical Society on March 20-21, 2013

On March 20-21, 2013, the American Astronautical Society (AAS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host the Goddard Symposium Conference at the Greenbelt Marriott in Greenbelt, Maryland from 8:30 a.m. to 5 p.m. This event is a two-day conference with a luncheon each day. The theme for the conference is "Success through Interdependence." The purpose of the event is to highlight the importance of collaboration both within and external NASA.

Approximately 350-400 people are expected to attend. Most NASA attendees who attend the luncheon are NASA Headquarters and Goddard Space Flight Center employees for whom NASA has paid a conference attendance fee or who are speaking at the conference that day. Some additional NASA employees have been invited by AAS to attend the luncheons. The estimated cost of the luncheon including all food and beverages is \$40.00 per person. The conference will be attended by representatives of the aerospace industry, professional societies, academia, other non-profit organizations, and other Federal agencies. I find that this event meets 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 the event because it will further Agency programs or operations. Accordingly, NASA employees – including employees in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect AAS may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect AAS such as by way of procurement duties, or who receive an invitation from an organization other than AAS, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

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

Adam F. Greenstone