

National Aeronautics and
Space Administration
Lyndon B. Johnson Space Center
2101 NASA Parkway
Houston, Texas 77058-3696



April 21, 2016

Reply to Attn of:

AL-16-040

TO: Distribution

FROM: AL/Deputy Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the
100Kin10 Summit Reception and Dinner

On April 27, 2016, the 100Kin10 Coalition will host a Reception and Dinner at Space Center Houston located in Houston, Texas. The dinner reception is part of the coalition's 5th annual partner summit. The reception will begin at 5:30 P.M., followed by the dinner which will begin at 6:30 P.M. The 100Kin10 coalition is an organization comprised of over 200 partner entities who are committed to a ten year goal of assisting in training and retaining 100,000 excellent science, technology, engineering, and mathematics (STEM) teachers to educate the next generation of innovators and problem solvers. This annual summit is scheduled for two full days and is 100Kin10's principal event. The reception and dinner is held at the end of the summit's first day to allow the participants to gather in an informal setting to facilitate summit related discussions and networking opportunities.

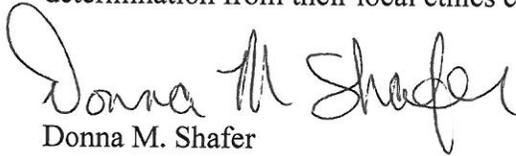
Attendance at the 100Kin10 reception and dinner is by invitation or included with each summit attendees' registration. NASA is a registered partner of the 100Kin10 coalition. The 100Kin10 organizers have extended invitations to several NASA personnel, who are not registered attendees of the summit, to attend the reception and dinner.

Approximately 350 guests are expected to attend this event, approximately 15 of those will be NASA civil servants. Expected attendees include partner representatives from academic institutions, nonprofit foundations, corporations, local governmental agencies, and other federal government agencies. There are no individual tickets sold for this event. The estimated cost per person for food and refreshments at the event is approximately \$65.00.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the agency and its activities. This event will further agency programs or operations including informing, educating, and engaging all generations to advance human space exploration, and providing the opportunity for the exchange of views and information between leaders within the agency and leaders interested in supporting STEM related education.

It is my determination that it is in the agency's interest for NASA invitees to attend the reception and dinner. Their attendance outweighs any concern that the acceptance of any benefits may, or may appear to improperly influence any NASA employee in the performance of official duties. Accordingly, NASA invitees whose duties do not substantially affect the 100Kin10 coalition are authorized to attend and to accept any food and refreshments offered in conjunction with this event.

NASA employees whose duties may substantially affect the 100Kin10 coalition, or who are in non-career positions for which Executive Order 13490 of January 21, 2009 requires signing an ethics pledge, are not covered by this determination and should seek an individualized ethics determination from their local ethics counselor regarding participation in this event.



Donna M. Shafer

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