

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 11, 2016

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 5th Annual Symposium of the Carmel Institute on April 19, 2016

On April 19, 2016, the National Air and Space Museum, along with the Carmel Institute of Russian Culture and History, will host a reception at the National Air and Space Museum in Washington, D.C. at 7:00 p.m. The purpose of the reception is to provide American students with the history and benefits of international space cooperation.

Approximately 700 people have been invited to attend, including members of Congress and their staff, personnel from the academia and industry, employees of other Federal agencies, and students from all the universities in the Washington Metropolitan Consortium of Universities. The estimated average value of refreshments served at the event, including all food and refreshments, \$99 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 NASA programs and international space partners. Accordingly, NASA employees, including NASA employees who are in non-career positions which Executive Order 13490 requires signing an ethics pledge, who have been invited to attend may accept free attendance for themselves and a guest to this event.

However, NASA employees whose duties may substantially affect the Carmel Institute, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from their local ethics counselor to attend under the widely attended gathering exception.

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

Adam F. Greenstone