

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



December 22, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Guidance Regarding Attendance by NASA Employees at the American Institute of Aeronautics and Astronautics (AIAA) National Capital Section Dinner, on February 17, 2016

On February 17, 2016, American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a lunch at the Army Navy Country Club, Arlington, VA, at 11.30 a.m. The guest speaker will be Mr. Winston A. Beauchamp, Deputy Under Secretary of the Air Force for Space.

Approximately 90 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$25.00 per person. The event will be attended by members of Congress and staff, representatives from the aerospace industry and academia, state and local officials, personnel from other Federal agencies, and other members of the general public. AIAA is in control of the table seating. I find that the 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 and operations. Attendance at the event will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the AIAA – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the AIAA for free attendance to the lunch.

However, NASA employees whose duties may substantially affect the AIAA or a majority of its members, such as by way of procurement duties, 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 black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone