

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



October 21, 2016

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Arizona State University School for the Future of Innovation of Society and New America Dinner on October 24, 2016

On October 24, 2016, the Arizona State University's (ASU) School for the Future of Innovation in Society and New America will hold a dinner at New America, 740 15th Street, NW, Washington, DC, from 6:00 p.m. – 9:00 p.m. The event is to celebrate the launch of Arizona State University's School for the Future of Innovation in Society.

Approximately 100 people are expected to attend the event. Attendees will include personnel from other federal agencies, representatives from academia, and members of industry. ASU is in control of the planning and seating for this event. The estimated cost of the event, including all food and beverages, is approximately \$85 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 on NASA's programs and policies. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and a guest to attend this event.

However, NASA employees whose duties may substantially affect ASU or New America, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Kathleen T. Spear

for Adam F. Greenstone