

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 13, 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 Cercle Espace Lunch Discussion on April 25, 2016

On April 25, 2016, while NASA employees are in Paris and Germany meeting with industry personnel for discussions on Journey to Mars, Centre d'Etudes et de Prospective Strategiques (CEPS) will host a luncheon at the Maison de la Recherche, Paris at 12:30 p.m. The event is to continue the discussion on the Journey to Mars.

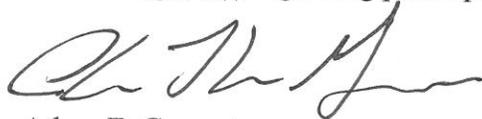
Subject to the exceptions noted below, attendance at the Cercle Espace Lunch Discussion on April 25, 2016 may be accepted pursuant to the exception for meals, refreshment, and entertainment in foreign areas in 5 C.F.R. § 2635.204(i). We have determined that the market value in the foreign area of the food, refreshments or entertainment provided at the event does not exceed the daily per diem rate for Paris as specified by the U.S. Department of State; there is participation in the meeting or event by non-U.S. citizens or by representatives of foreign governments or other foreign entities; and the NASA employees are attending as part of their official duties to represent the United States and further the programs and operations of NASA.

Approximately 40 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$114.35 per person (100 €). The event will be attended by members of the European Space Policy Institute and CEPS, Foreign government officials, industry leaders, and personnel from other Federal agencies.

Additionally, 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 reception will allow NASA representatives to exchange views and ideas with others in attendance.

Accordingly, NASA employees whose duties do not substantially affect CEPS – 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 CEPS for free attendance to the luncheon.

However, NASA employees whose duties may substantially affect CEPS, 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', written in a cursive style.

Adam F. Greenstone