

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



December 2, 2015

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 Challenger Center President's Circle Event on December 10, 2015

On December 10, 2015, the Challenger Center, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host an event at Van Scoyoc Associates Office in Washington, D.C., at 6:00 p.m. The Challenger Center is in control of the invitations, planning, and arrangements of the event. There is no formal seating. The event is to honor the Challenger Center's partners and supporters.

Approximately 250 people have been invited to attend, including personnel from other Federal agencies, congressional members and staff, Challenger Center Board Members, Advisory Council members, and representatives from industry. The estimated cost of the reception, including all food and beverages, is \$30.00 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 various NASA programs.

NASA employees whose duties do not substantially affect the host, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance for themselves and a guest to the event.

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

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). We understand that no personal gifts will be given to the attendees.

A handwritten signature in blue ink, appearing to read 'A. Greenstone', with a long horizontal flourish extending to the right.

Adam F. Greenstone