

National Aeronautics and
Space Administration

John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



August 10, 2016

Reply to Attn of: G

TO: Distribution

FROM: Deputy Designated Agency Ethics Official, Acting Chief Counsel

SUBJECT: Widely Attended Gathering Determination regarding attendance at an "Evening with the Stars: Celebrating Glenn's 75th Anniversary."

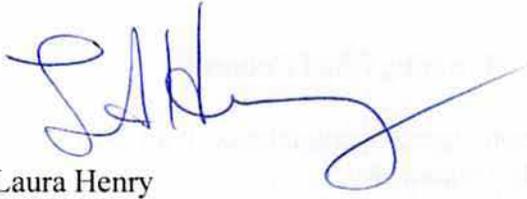
On the evening of Tuesday, September 20, 2016 from 6:30 until 9:30pm, the NASA Glenn Research Center (GRC) is hosting a reception with a cash bar, program presentations and a coffee and dessert social, sponsored by the Ohio Aerospace Institute (OAI) at the Cleveland Museum of Art, located at 11150 East Blvd., Cleveland, Ohio. This event titled, "An Evening with the Stars: Celebrating Glenn's 75th Anniversary, Our Past, Our Present, Your Future," will focus on Glenn's unique contributions to research and technology innovation with high priority and relevance to our region and nation. Subject Matter Experts will present talks about NASA Spinoffs in Communications and Medicine, the Orion Program, and New Aviation Horizons. Speakers include the GRC Center Director, Subject Matter Experts, and other NASA officials.

Among the 400 guests invited to this event are business leaders, Congressional leaders, academia, NASA personnel, and representatives from other Federal agencies. The estimated cost per person for the reception, coffee and dessert social and program is \$106.24 per person. No gifts will be given at the event.

Attendance at the reception will allow NASA employees an opportunity to present and discuss issues of interest with the scientific community, including NASA research and discoveries with attendees from other Federal agencies, business and academic leaders. Therefore, I conclude that NASA interest in its employees attending this event outweighs any concern that free attendance may, or may appear to improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect OAI, including employees in non-career positions, for which the Executive Order 13490 requires signing an ethics pledge, may accept an invitation for free attendance to the reception and program. OAI is a 501(c) (3), not-for-profit organization of the Internal Revenue Code.

NASA employees whose duties may substantially affect the event hosts, 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.



Laura Henry
Acting Chief Counsel