

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



January 19, 2016

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance by NASA Employees at the Goddard Memorial Dinner and reception, hosted by the National Space Club (NSC) on March 11, 2016

On March 11, 2016, the National Space Club and Foundation (the Club), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host and sponsor the Goddard Memorial Dinner and reception at the Washington Hilton, 1919 Connecticut Avenue, N.W., Washington, D.C., from 6:30 p.m. to 10:00 p.m. The purpose of the event is to present to The New Horizons Pluto Mission Team the 2016 Dr. Robert H. Goddard Memorial Trophy for outstanding accomplishments in spaceflight, engineering, science, management and education. Dr. S. Alan Stern, Associate Vice President of Research and Development at Southwest Research Institute, will accept the award on behalf of the team. There are several NASA centers and/or programs that are part of this team.

Approximately 2,200 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is \$300.00 per person. The event will be attended by senior leaders of the aerospace industry, members of Congress and staff, representatives from academia and the media, state and local officials, personnel from other Federal agencies, and other members of the general public. As in previous years, the Club will invite government guests, and 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 dinner and reception will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Club or a majority of its corporate members – 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 Club for themselves and a guest for free attendance to the dinner and reception.

Moreover, NASA employees whose duties may substantially affect the Club 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.

This widely attended gathering determination does not cover the receptions in hospitality suites that may occur after the Goddard Memorial Dinner concludes. These suites will be hosted by corporate sponsors. Most NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. However, non-career NASA employees subject to the Ethics Pledge required by Executive Order 13490 must provide reimbursement for the fair market value of any refreshments they or their guests consume in the hospitality suites. We understand that honor baskets to do so will be provided.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", is written over the printed name.

Adam F. Greenstone