

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



February 23, 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 Luncheons at the Goddard Memorial Symposium hosted by the American Astronautical Society on March 8-10, 2016

On March 8-10, 2016, the American Astronautical Society (AAS), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host the Goddard Memorial Symposium at the Greenbelt Marriott, Greenbelt, Maryland, from 8:30 a.m. to 5 p.m. This event is a two-day conference with a luncheon each day -- March 9, Awards Luncheon, at 12:00 p.m. and March 10, Awards Luncheon, at 12:00 p.m. AAS is in control of the planning and invitations for the event. The guest speakers for the lunches are John Holdren, Director, Office of Science and Technology Policy on the 9th and Robert Lightfoot, Associate Administrator, National Aeronautics and Space Administration on the 10th. The purpose is to highlight the importance of science and the natural collaboration with exploration programs within and outside of NASA.

Approximately 90 people are expected to attend. Most NASA employees who attend the luncheons are NASA Headquarters and Goddard Space Flight Center employees for whom NASA has paid a conference registration fee, which includes the cost of the luncheons, or who are speaking at the conference that day. Some additional NASA employees have been invited by AAS to attend the luncheons. The estimated cost of the luncheons including all food and beverages is \$40.00 per person per luncheon. The conference will be attended by members of Congress and their staff, state and local officials, representatives of the aerospace industry, academia, other non-profit organizations, other Federal agencies, and the media. I find that this 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 events because it will further Agency programs or operations. Accordingly, NASA employees – including employees in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect AAS, or a majority of its members, may accept an invitation for free attendance to these events.

However, NASA employees whose duties may substantially affect AAS, or a majority of its members, such as by way of procurement duties, or who receive an invitation from an organization other than AAS, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in these events 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