

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



August 31, 2015

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Events Related to the Historically Black Colleges and Universities Week Conference Events, September 20-22, 2015

Representatives from NASA have been invited to attend a series of events in conjunction with the Historically Black Colleges and Universities Week Conference (HBCU) events. The following are events that NASA employees are attending:

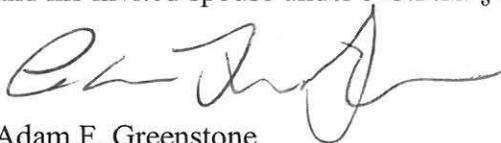
1. Welcome Reception, September 20, 2015: United Negro College Foundation and the National Merit Scholarship Council, both nonprofit organizations under 501(c)(3) of the Internal Revenue Code, are holding a reception at 5:00 p.m. at the Washington Marriot Wardman Park, Mariott Ballroom, in Washington, DC. Approximately 1200 people have been invited, including Congressional members and their staff, other U.S. Government agencies, state and local government officials, representatives from industry, academia, media, and the public. The approximate cost per person is \$32.00.

2. Reach Higher Luncheon, September 1, 2015: The Bill & Melinda Gates Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, is holding a luncheon at 1:00 p.m. at the Washington Marriot Wardman Park, Salon 2 and 3, Washington, DC. Approximately 1200 people have been invited, including Congressional members and their staff, other U.S. Government agencies, state and local government officials, representatives from industry, academia, media, and the public. The approximate cost per person is \$35.00.

3. A Crucial Conversation About the Value of STEM, Partnerships and Entrepreneurship Luncheon, September 22, 2015: The ASPiRE TV, The Bill and Melinda Gates Foundation, Billion Dollar Roundtable, Gourmet Service, Inc., Lockheed Martin, Northrop Grumman Corporation, Sodexo, The Kresge Foundation and the Lumina Foundation are holding a luncheon at 11:45 a.m. at the Washington Marriot Wardman Park, Salon 2 and 3, Washington, DC. Approximately 1200 people have been invited, including Congressional members and their staff, other U.S. Government agencies, state and local government officials, representatives from industry, academia, media, and the public. The approximate cost per person is \$35.00.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because of NASA's interest in the collaboration and participation of the Science, Technology, Engineering and Math (STEM) Program, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at these events for themselves. NASA employees, whose duties may substantially affect these co-sponsors, 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 ethics counselor.

However, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may accept free attendance at the Welcome Reception and the Reach Higher Luncheon, but may only attend the A Crucial Conversation About the Value of STEM, Partnerships and Entrepreneurship Luncheon if they reimburse the sponsors the cost of the reception. Because he will be speaking at the A Crucial Conversation About the Value of STEM, Partnerships and Entrepreneurship Luncheon, the NASA Administrator may accept free attendance for himself and his invited spouse under 5 C.F.R. § 2635.204(g)(1).

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone