

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



August 26, 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 Hispanic Engineering, Science and Technology Program Reception and Dinner on October 4, 2015

On October 4, 2015, the Hispanic Engineering, Science and Technology (HESTEC) Program, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and Anheuser-Busch, AT&T, and Verizon, will host a reception and dinner at the University of Texas-Pan American Campus in Edinburg, Texas, the reception begins at 6:00 p.m., followed by the dinner at 6:55 p.m. The University of Texas-Pan American is in control of the seating. The event is to bring together industry executives and government leaders to discuss impact the program has had and successful strategies for increasing minority participation in the fields of engineering, science and technology.

Approximately 300 people have been invited to attend, including Congressional members, media, corporate and industry representatives, high school students and educators, higher education administrators, and employees of other Federal agencies. The estimated cost of the dinner, including all food and beverages, is \$50 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.

However, 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsor the value of the event to include all food and refreshments they consume and any gift items accepted.


Adam F. Greenstone