

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 22, 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 the Events Related to the International Astronautical Federation (IAF) Spring Meeting in Paris, France, March 22-23, 2016

Representatives from NASA have been invited to attend a series of events in conjunction with the International Astronautical Federation (IAF) Spring Meeting at the CAP 15 Conference Center, in Paris, France. The IAF is intended to enable representatives from the space industry, space users, space policy makers, students, young professionals, researchers and academicians to meet and exchange experiences and knowledge on space-related topics, and to develop world-wide cooperation programs. The spring meeting is organized by the International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, based in Paris, France. The Federation is hosted by one of the IAF's member countries, which forms a local organizing committee. The events are as follows:

1. Breakfast with Women in Aerospace – Europe, March 22, 2016: Women in Aerospace (WIA) – Europe, a foreign, 501(c)(3) non-profit under the umbrella of the United Nations, and the IAF will host a breakfast at the CAP 15 Conference Center, at 8:00 a.m. The breakfast will provide discussion on space technology topics. Approximately 150 people are expected to attend, including NASA personnel and other Federal agencies, industry, academia, students, media, and foreign nationals. The cost of the food and beverages is approximately \$23 per person (20€).
2. Reception for the International Astronautical Federation (IAF), March 23, 2016: The International Astronautical Federation (IAF), a non-governmental, non-profit membership organization, together with the American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the CAP 15 Conference Center, Paris, France, at 8:00 p.m. The reception signifies the end of the International Astronautical Federation (IAF) Spring Meeting, a meeting focused on space topics for three days. Approximately 300 people are expected to attend the reception. Expected attendees include representatives from NASA, foreign government Agencies, foreign government officials, industry

representatives, academia, students and young professionals, and members of the public. The dinner will include food and beverages valued at approximately \$23 per person (20€).

In accordance with 5 C.F.R. § 2635.204(g), and 14 C.F.R. § 1207.103, I find that the events listed above meet the definition of a “widely attended gathering.”

I further find that there is an agency interest in having NASA employees attend the events, as they will have the opportunity to further agency programs and operations through the exchange of views and information with other attendees. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the sponsors listed above 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 the events from their local ethics counselor.

Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may attend the events for free. In addition, the Administrator and Deputy Administrator may accept free attendance at the events at which they are speaking.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion (and no more than \$50 from one source in a calendar year). NASA invitees should not accept any gift items distributed at the events which exceed the \$20 cap.



Adam F. Greenstone