National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

December 22, 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 Maryland Space Business Roundtable Lunch on January 20, 2016

On Wednesday, January 20, 2016, the Maryland Space Business Roundtable (MSBR), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a lunch at Martin's Crosswinds, Greenbelt, Maryland, at 11:45 a.m. The guest speaker is Dr. Richard Spinrad, Chief Scientist at the National Oceanic and Atmospheric Administration. The lunch is to address the business environment in Maryland and to provide the opportunity for the environmental research communities to share views with colleagues.

Approximately 350 people have been invited to attend, including personnel from other Federal agencies, congressional members and staff, state and local officials, the media, representatives of the environmental and space industries and academia, as well as the general public. The estimated cost of the luncheon, including all food and beverages, is $33.00 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.

NASA employees whose duties do not substantially affect the MSBR, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the MSBR, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

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). We understand that the MSBR will be distributing a 2016 pop-up calendar, the total value is $1.00.

Adam F. Greenstone