

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



May 24, 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 Orbital ATK Booster Qualification Motor Static Test Activities on June 27-28, 2016

On June 27, 2016, Orbital ATK will host a dinner at the Orbital ATK Conference Center in Promontory, Utah, and a box lunch on June 28, 2016, at the Utah State University, Brigham City Campus in Brigham City, Utah. The purpose of the dinner is to discuss the plans for the ground test. The guest speaker for the lunch on June 28, 2016, is William H. Gerstenmaier, Associate Administrator for Human Exploration and Operations, National Aeronautics and Space Administration (NASA).

Approximately 100 people have been invited to attend the dinner and approximately 300 have been invited to attend the luncheon, including members of Congress and their staff, personnel from the industry, and employees from other Federal agencies. The estimated value of refreshments served at the events, including all food and refreshments, \$35 per person (\$25 for the dinner and \$10 for the box lunch). 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 NASA programs and hear views that relate to NASA's policies and plans from representatives of various sectors. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance to this event.

*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 food and refreshments.*

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone