

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



May 16, 2016

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Partnership for Public Service Dinner on May 17, 2016

On May 17, 2016, the Partnership for Public Service, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a dinner at the 1100 New York Avenue, NW in Washington, D.C., from 5:45 p.m. through 8:30 p.m. The event is to discuss and assess the procedures for the smooth transition between administrations.

Approximately 35 people have been invited to attend, including representatives from Federal agencies and former employees of the Federal government. The estimated cost of the event, including all food and beverages, is \$39 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 – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the Partnership for Public Service or a majority of its members, may accept an invitation for free attendance to the reception for themselves.

However, NASA employees whose duties may substantially affect the Partnership for Public Service, 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 Partnership for Public Service will be distributing a guide book entitled "Presidential Transition Guide", the market value is \$5.00.

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

Adam F. Greenstone