

**National Aeronautics and Space Administration**

**Headquarters**  
Washington, DC 20546-0001



September 15, 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 Sammies People's Choice Award 2016 Reception and Dinner on September 20, 2016

On September 20, 2016, the Partnership for Public Service; a nonprofit organization under 501(c)(3) of the Internal Revenue Code will host a reception, dinner and award ceremony at the Andrew W. Mellon Auditorium, located in NW, Washington, DC, at 5:30 p.m. Sponsorship support will be provided by Microsoft, The Boston Consulting Group, ConantLeadership, Deloitte, Citi, ForeSee, Grant Thornton, McKinsey & Company, Oliver Wyman, Cisco Systems, Hewlett Packard Enterprise, Proctor & Gamble, and Mathematica Policy Research. However, the Partnership for Public Service is directing planning and seating. The event is to celebrate excellence in the federal workforce.

Approximately 600 people have been invited to attend, including Congressional Members, federal government agencies, members of the media, academia, and representatives from the industry. Partnership for Public Service is in control of the planning, seating and invitations to the event. The estimated cost of the event, including all food and beverages, is approximately \$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.

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 hosts or a majority of its members, may accept an invitation for free attendance to the lunch for themselves.

However, NASA employees whose duties may substantially affect the hosts, 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.

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

Adam F. Greenstone