National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

October 12, 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 Space Policy Institute Dinner on November 16, 2016

On November 16, 2016, the Space Policy Institute (SPI) of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a dinner at the Hotel Lombardy, 2019 Pennsylvania Avenue., NW, Washington, DC, from 6:30 p.m. – 9:30 p.m. The guest speaker at the event will be Mr. Ben Roberts, White House Office of Science and Technology Policy.

Approximately 50 people are expected to attend the event. Attendees will include personnel from other federal agencies, congressional members and staff, and representatives from academia, the media, foreign embassies, and industry. The estimated cost of the event, including all food and beverages, is approximately $82 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 on NASA's programs and policies. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation to attend this event.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

Kathleen T. Spear

for Adam F. Greenstone