National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 21, 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 Transportation Association (STA) Luncheon on May 10, 2016

On May 10, 2016, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon at the Rayburn House Office Building, Room 2325 in Washington, D.C., from 11:30 a.m. through 1:00 p.m. The guest speakers will be John Honeycutt, Manager, Space Launch System Program, National Aeronautics and Space Administration (NASA); Mark Kirasich, Manager, Orion Program, NASA; and, Mike Bolger, Manager, Ground Systems Development and Operations Program, NASA.

Approximately 300 people have been invited to attend, including Congressional members and staff, industry representatives, and employees of other Federal agencies. The estimated cost of the event, including all food and beverages, is $20 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 STA or a majority of its members, may accept an invitation for free attendance to the luncheon for themselves.

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

for Adam F. Greenstone