September 11, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the V.I.P. Luncheon related to the Congressional Black Caucus’ Annual Legislative Conference’s (ALC) Science and Technology Braintrust panel discussion on September 18, 2015

Representatives from NASA have been invited to attend a luncheon in conjunction with the Congressional Black Caucus’ Annual Legislative Conference (ALC) Braintrust panel discussion entitled “Pushing Limits: The Future of Consumer Electronics & The Journey to Mars and Beyond” at which three NASA employees will be participating on the panel.

The luncheon on September 18, 2015 follows the panel discussion and will be provided by Texas Instruments Incorporated at 12:30 p.m. at the Willard InterContinental Hotel, The Nest Room, Washington, D.C. The NASA Administrator will be the keynote speaker at the luncheon. Approximately 70 people have been invited, including Congressional members and their staff, representatives from other U.S. Government agencies, state and local government officials, representatives from industry, and academia. The approximate cost per person is $69.00.

I find that this event meets the requirement of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). Because the content relates to NASA’s exploration and technology development objectives, I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at this event for themselves. NASA employees, whose duties may substantially affect the 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 ethics counselor.

NASA employees who are in non-career positions in which the President’s Executive Order of January 21, 2009, requires signing an ethics pledge and who are not scheduled speakers or panelists at this event may only attend the luncheon if they reimburse the sponsors the cost of the luncheon.

Adam F. Greenstone