National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 24, 2014

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the American Astronautical Society, International Space Station Utilization Reception on May 1, 2014

On May 1, 2014, the American Astronautical Society (AAS), together with Lockheed Martin, Orbital Sciences Corporation, and the Sierra Nevada Corporation, will host a reception at the Russell Senate Office Building, Committee Hearing Room 253, Constitution and Delaware Avenues NE in Washington, DC, from 1:00 p.m. to 6:00 p.m. American Astronautical Society is a non-profit organization under 501(c)(3) of the Internal Revenue Code. The purpose of the reception is to recognize significant research results from the International Space Station.

Approximately 90 individuals are expected to attend to include representatives from other Federal agencies, Congressional staff, local media, AAS members and industry representatives. The estimated cost of the reception, which includes all food and beverages, is $20 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. This event will allow NASA employees the opportunity to discuss space-related issues and NASA programs with other attendees. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance at the event.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of contracting 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the value of the event and any gifts items received.

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). NASA employees should not accept any gift items distributed at the reception, which exceed the $20 cap.

Adam F. Greenstone