

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 2, 2014

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Guidance Regarding Attendance by NASA Employees at the AAU Golden Goose Award Ceremony hosted by the Association of American Universities on September 18, 2014

On September 18, 2014, the Association of American Universities (AAU), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Mumford Room in the Library of Congress, James Madison Building, Washington, D.C. at 5:30 p.m. Sponsors that support the event, which is administered and controlled by the host, include AAMC, American Mathematical Society, SAGE Publications, APS Physics, APS Psychological Science, Batelle, University of Illinois, Gordon & Betty Moore Foundation, FASEB, IEEE-USA, Texas Instruments, The Biophysical Society, Vanderbilt University, American Astronomical Society, American Society for Microbiology, The Babcock and Wilcox Company, and Stanford University. The event is to celebrate achievements in science and will facilitate thoughtful discussion between government officials and professionals in the industry and academia.

Approximately 200 guests have been invited to attend. Invitees include members of Congress, congressional staff, NASA personnel, members of affiliated organizations, representatives from industry and academia, and personnel from other Federal agencies. The value of the events, which include all food and refreshments, will be approximately \$30.00 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)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding NASA's plans and programs. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance to this event.

Accordingly, NASA employees whose duties do not substantially affect the host, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation to this event.

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

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). We understand that a pen, a post-it pad, and a bag of unpopped popcorn will be distributed to the attendees, total value of less than \$5.

A handwritten signature in black ink, appearing to read 'A. Greenstone', with a long horizontal flourish extending to the right.

Adam F. Greenstone