National Aeronautics and Space Administration

**Headquarters**
Washington, DC 20546-0001

May 13, 2015

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 American Institute of Aeronautics and Astronautics (AIAA) National Capital Section Dinner, on May 20, 2015

On May 20, 2015, American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a dinner at the Army Navy Country Club, Arlington, VA, at 6:00 p.m. The guest speaker will be Mr. Chris Scolese, Director of the NASA Goddard Space Flight Center.

Approximately 120 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is $28.00 per person. The event will be attended by members of Congress and staff, representatives from the aerospace industry and academia, state and local officials, personnel from other Federal agencies, and other members of the general public. AIAA is in control of the table seating. I find that the 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 and operations. Attendance at the event will allow NASA representatives to exchange views and ideas with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the AIAA or a majority of its members – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the AIAA for free attendance to the dinner.

However, NASA employees whose duties may substantially affect the AIAA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone