National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

February 4, 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 AIAA National Advisory Committee for Aeronautics 100th Anniversary Celebration hosted by the American Institute of Aeronautics and Astronautics, on March 3, 2015

On March 3, 2015, American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the National Air and Space Museum, Washington, DC, at 7:00 p.m. The event is to commemorate the founding of the National Advisory Committee for Aeronautics.

Approximately 375 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is $125.00 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. As in previous years, the AIAA will invite government guests, and 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 reception 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 themselves and a guest for free attendance to the reception.

Moreover, 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