National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

May 8, 2015

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Aerospace Industries Association (AIA) Team America Rocketry Challenge on May 9, 2015

On May 9, 2015, the Aerospace Industries Association (AIA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host breakfast, lunch, ice cream social, VIP reception, and dinner for its members and invited guests at the Team America Rocketry Challenge (TARC) National Finals Fly-off at Great Meadow in The Plains, Virginia.

TARC, which is sponsored by AIA[1], is an annual American Rocketry competition for students in grades 7 to 12 to design, build, and launch a rocket. It is a national aerospace-specific Science, Technology, Engineering and Math (STEM) competition where students can learn engineering, aerodynamics, meteorology and computer simulation. The ultimate goal of TARC is to inspire and attract the next generation of engineers and technicians to join the aerospace industry. The event on May 9th is the final "fly-off" where students actually launch their rockets.

This TARC event is open to the public but 200 people are invited to the VIP reception ($60 per person) at the Membership Hospitality House which will be open all day and 900 people are invited to the other food events (per person: breakfast - $7.00, Lunch - $10.95, ice cream social - $5.75, and Dinner - $17.00). The event will be attended by Congressmen and staffers, AIA Members, NASA and personnel from other Federal agencies, invited guests of the AIA staff, and STEM community members. 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 students and others interested in aerospace and STEM education. Accordingly, NASA employees whose duties do not substantially affect the AIA or a majority of its members may accept an invitation from the AIA for free attendance at all the food events.

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[1] TARC is a joint project of AIA and the National Association of Rocketry [501(c)(3)]. Portions of TARC are organized through the National Center for Advanced Technology [501(c)(3)].

However, NASA employees whose duties may substantially affect the AIA 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. 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 sponsor the value of the events and any gift items accepted for themselves and an accompanying guest.

Adam F. Greenstone