

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 11, 2014

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a reception hosted by Associated Universities, Inc. on February 13, 2014

On February 13, Associated Universities, Inc. (AUI), a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a reception. This event will take place at the Westin Arlington Gateway Hotel, 801 N. Glebe Road, Arlington, VA, from 6:30 to 8:30 p.m. The purpose of the event is to meet with the AUI Board of Trustees.

Approximately 250 people have been invited. Attendees will include Congressmen and staffers, state and local officials, academia, other Federal Agencies, members of the public and contractors. The estimated cost of the event, including all food and beverages, is approximately \$50 per person. Seating for the reception will not be assigned.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information on NASA's programs and policies. Accordingly, NASA employees whose duties do not substantially affect AUI, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone