

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 6, 2014

Reply to Attn of General Law Practice Group

TO: Distribution

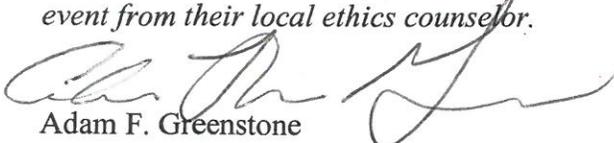
FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Beya Global Competitiveness Conference February 6-8, 2014

On February 6-8, 2014, the Career Communications Group, a minority owned small business that does not employ registered lobbyists, will host various educational seminars relating to leadership, diversity and inclusion, as well as the Stars and Stripes Dinner (February 7) and the Beya Gala (February 8) at the Marriot Wardman Park Hotel in Washington, D.C. on February 6-8. The Stars and Stripes Dinner will recognize the top African Americans in the Military and the Gala will acknowledge top science, technology, engineering and math (STEM) professionals.

Academic professors, students, STEM professionals, and representatives from Federal agencies, the military, and industry will attend these events. Approximately 800 people will attend the Stars and Stripes dinner, including individuals in senior military leadership positions from minority backgrounds. Approximately 2200 people will attend the Beya Gala. Career Communications Group (CCG) controls the seating for these events and the invitations issued to people to be CCG's guests. Up to 60 people will attend each seminar. Individual tickets are, for the Stars and Stripes Dinner \$125 (Government rate), for the Beya Gala \$150, and \$59 each for the professional seminars. There is also a Modern Day Technology Leadership Luncheon for seminar attendees on Friday, February 7, for which individual tickets are \$125.

I find that these events meet 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 these events because attendance will further Agency programs and operations. Participating will enable NASA employees to discuss NASA's programs and plans, including STEM initiatives and diversity advancement, and to hear about important initiatives and lessons learned in other organizations. Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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 to the seminars, and for themselves and an invited guest for the Stars and Stripes Dinner, Beya Gala and Friday luncheon. *However, NASA employees whose duties may substantially affect the event sponsor such as by way of procurement duties, who receive an invitation from an organization other than CCG, or who receive an invitation for an event not described above 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