

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



June 18, 2014

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 D.C. College Access Program Graduation and Reception, June 19, 2014

On Thursday, June 19, 2014, District of Columbia College Access Program, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a reception following the Graduation of the Class of 2014, at the Washington Marriott Wardman Park, 2600 Woodley Park Road, NW, Washington, D.C. The doors open at 4:00 p.m. and all guests must be through security and seated by 6:00 p.m. to attend the graduation ceremony.

Approximately 200 people have been invited to attend the reception, including members of Congress, state and local officials, university presidents, corporate executives, D.C. high school personnel, media, and other Federal agencies, and family members of the graduates. The estimated average value of refreshments served at the reception, including all food and beverages, is \$100.00 per person. 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 and operations. Attendance at the event will allow NASA attendees to exchange views and information concerning NASA's education objectives with leaders and others from various communities, including higher and secondary education, government, and industry.

NASA employees whose duties do not substantially affect the DC-CAP, or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the DC-CAP, 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