National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 30, 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 a Conference and Reception hosted by Explore Mars, Inc., and the Space Policy Institute of George Washington University (GWU) on May 5 – 7, 2015

On May 5-7, 2015, Explore Mars, Inc. and the Space Policy Institute of George Washington University's (GWU), both not-for-profit organizations under Section 501(c)(3) of the Internal Revenue Code, will host the Humans to Mars Summit 2015 conference. Sponsors that support the event, which is administered and controlled by the hosts, include Boeing, Lockheed Martin, Aerojet Rocketdyne, ATK, Uwingu, Thales Alenia Space, MDA, and National Institute of Aerospace. This event will take place at George Washington University in the Lisner Auditorium and Betts Auditorium. The conference is from 8:30 a.m. – 5:30 p.m., May 5 and 6 and 9:00 a.m. – 1:00 p.m. on May 7. There will also be an Evening with Buzz Aldrin reception on May 5th at 7:00p.m. in the Lisner Auditorium. The sponsors for the reception are the same as those for the conference.

The purpose of this event is to bring experts together from around the world to facilitate discussions about the technical, scientific, and policy challenges of sending humans to Mars in the upcoming decades. Approximately, 700 people were invited to the event. Attendees will include representatives from academia; organizations focused on science, technology, engineering, and math (STEM) education; industry, the media; students; congressional members and staff; and interested members of the general public. The estimated cost of the conference is $225, which includes food and beverages estimated to be $160 per person. For personnel attending the Evening with Buzz Aldrin reception only, the cost of the food and beverages is $50. Explore Mars, Inc. and the Space Policy Institute of George Washington University (GWU) are organizing the events and control the guest lists and invitations.

I find that the Humans to Mars Summit 2015 and the evening reception meet 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 events because they will further Agency programs or operations. Attendance at the events will allow NASA attendees to exchange information on NASA's aerospace and exploration programs with interested representatives of significant communities. 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 and an invited guest for free attendance to the Humans to Mars 2015 Summit and reception. However, NASA employees whose duties may substantially affect the event hosts, 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.

Attendees are reminded of the $20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than $20 per occasion (and no more than $50 from one source in a calendar year).

Adam F. Greenstone