

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



November 17, 2014

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 Robert and Virginia Heinlein Prize Trust and John Hopkins University Applied Physics Laboratory Reception on November 21, 2014

On Friday, November 21, 2014, the Robert and Virginia Heinlein Prize Trust and John Hopkins University Applied Physics Laboratory, both nonprofit organizations established under 501(c)(3) of the Internal Revenue Code, will host a reception at the National Air and Space Museum, in Washington, D.C., from 7:00 p.m. to 10:00 p.m. The event is to honor the recipient of the Heinlein Award, Daniel J. O'Shaughnessy, for his development of the space-tested technology that can benefit commercial space activities.

Approximately 400 people have been invited to attend, including members of Congress, Congressional Staff, representatives from academia and industry, selected members of the media, and employees of other Federal agencies. The estimated cost of the reception, including all food and beverages, is \$60 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 find that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations.

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at these events will allow NASA attendees to exchange information regarding NASA's plans and programs. Accordingly, NASA employees (subject to the exception noted below) who have been invited to attend may accept free attendance for themselves and a guest to this event. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may accept an invitation for free attendance for themselves and a guest to the event.

*However, NASA employees whose duties may substantially affect the event sponsors, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in these events from their local ethics counselor to attend under the widely attended gathering exception.*

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). We understand that the attendees will be receiving a gift of the non-fiction science book *Robert Heinlein's Requiem*, which has an estimated value of \$15.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone