

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



September 17, 2014

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

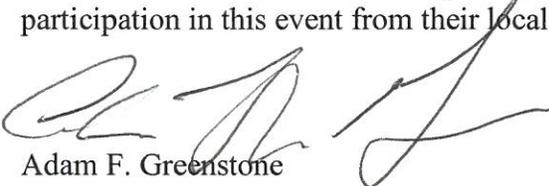
SUBJECT: Determination Regarding Attendance by NASA employees at the Hispanic Engineering, Science and Technology Program Reception and Dinner on October 5, 2014

On October 5, 2014, the Hispanic Engineering, Science and Technology (HESTEC) Program, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, and Anheuser-Busch, L&F Distributors, Verizon, IBC, and Lone Star, will host a reception and dinner at the University of Texas-Pan American Campus in Edinburg, Texas, the reception begins at 5:30 p.m., followed by the dinner at 6:55 p.m. The University of Texas-Pan American is in control of the seating. The event is to bring together industry executives and government leaders to discuss strategies for increasing minority participation in the fields of engineering, science and technology.

Approximately 300 people have been invited to attend, including Congressional members, state and local officials, media, corporate representatives, high school students and educators, higher education administrators, and employees of other Federal agencies. The estimated cost of the dinner, including all food and beverages, is \$50 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 or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

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

However, NASA employees whose duties may substantially affect Anheuser-Busch, L&F Distributors, Verizon, IBC, and/or Lone Star, 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.


Adam F. Greenstone