

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



January 9, 2014

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Heads of Space Agencies Summit events hosted by the International Academy of Astronautics on January 9-10, 2014

On January 9, 2014, the International Academy of Astronautics (IAA), a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host a pre-Summit Space Exploration Conference followed by the Heads of Space Agencies Summit on Exploration on January 10 at the Ronald Reagan Building and International Trade Center, 1300 Pennsylvania Avenue, NW, Washington, D.C., 20004. The purpose of the Conference is for authors to present papers in one of six sessions covering the topics of planetary robotic and human spaceflight exploration. The purpose of the Summit is to allow leaders of space-faring nations to discuss topics of international importance in the area of human and robotic space exploration. In addition, the IAA Summit will be taking place in cooperation and conjunction with the ministerial International Space Exploration Forum, a policy dialogue on space exploration at minister-level hosted for the first time by the U.S. Department of State with Ministers and government representatives from the U.S. and around the world.

Approximately 400 people are expected to attend. The registration cost to attend the Conference and the Summit is \$203.85 (150 Euros) for each day.

In conjunction with the Conference and Summit, IAA will host several events.

The events are as follows:

1. Pre-Gala Private Reception, January 9, 2014: IAA will host a reception at the Ronald Reagan Building and International Trade Center in the Oculus beginning at 6:30 p.m. Approximately 150 people are expected to attend the reception. Attendees will include heads of agencies, members of the aerospace industry, association representatives, academia, and the public. The reception will include food and beverages valued at approximately \$120.00 per person.
2. Gala Dinner, January 9, 2014: IAA will host a gala dinner at the Ronald Reagan Building and International Trade Center in the Oculus. Seating is organized by the IAA. Approximately 400 people are expected to attend the dinner. Attendees will include heads of agencies, members of the aerospace industry, association representatives, academia, and the public. The dinner will include food and beverages valued at approximately \$176.67 per person (130 Euros)

3. Summit Private Breakfast, January 10, 2013: IAA will host a breakfast at the Ronald Reagan Building and International Trade Center in the Polaris Suite at 7:30 a.m. Seating is organized by the IAA. Approximately 150 people have been invited. Attendees will include heads of agencies, members of the aerospace industry, association representatives, academia, and the public. The breakfast will include food and beverages valued at approximately \$28.00 per person.
4. Summit Private Luncheon, January 10, 2013: IAA will host a luncheon at the Ronald Reagan Building and International Trade Center in the Polaris Suite at 12:15 p.m. Seating is organized by the IAA. Approximately 150 people have been invited. Attendees will include heads of agencies, members of the aerospace industry, association representatives, academia, and the public. The luncheon will include food and beverages valued at approximately \$42.00 per person.

I find that the Conference & Summit events listed above 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 these events because it will further Agency programs or operations. Attendance at the events will allow NASA attendees to exchange information regarding various NASA programs.

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 invitations for themselves for free attendance to the events.

However, NASA employees whose duties substantially affect the sponsors, 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 these events 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. We understand that IAA will be distributing a black leather travel wallet valued at \$20 at the Gala Dinner.



Adam F. Greenstone