National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

February 27, 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 the new Solar Exhibit Opening on March 18, 2015

On March 18, 2015, Lockheed Martin Advanced Technology Center will host a reception at the opening of the new Solar Exhibit, which features data from NASA's Solar Dynamics Observatory. The opening will be held at the National Air and Space Museum (NASM) in Washington, D.C., at 6:30 p.m. The event is to celebrate the opening of the Smithsonian NASM's newest solar exhibit featuring data from NASA's Solar Dynamics Observatory.

Approximately 225 people have been invited to attend, including members of Congress and the public, personnel from the media, academia, and industry, and employees of other Federal agencies. The estimated value of the event, including the value of all the food and refreshments, is $100 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 NASA programs and hear views that relate to NASA's policies and plans from representatives of various sectors. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance to this event.

However, NASA employees whose duties may substantially affect the event hosts, 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. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsor the value of the event to include all food and refreshments they consume and any gift items accepted.

Adam F. Greenstone