

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



August 6, 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 Cygnus Commercial Resupply Service (CRS) Mission Completion Reception hosted by Orbital Sciences Corporation on September 3, 2014

On September 3, 2014, Orbital Sciences Corporation (Orbital) scheduled a reception to celebrate the completion of the Cygnus Commercial Resupply Service (CRS) Mission. There will be a short program followed by a reception held at The Liaison Capitol Hill, Washington, DC, from 4:30 p.m. to 6:30 p.m. The mission carried and delivered supplies and equipment to the International Space Station. The event will also highlight research supplied by the mission.

Approximately 300 guests have been invited to attend. Invitees include members of Congress, congressional staff, NASA personnel, state and local government officials, representatives from other companies and academia, and personnel from other Federal agencies. The value of the events, which include all food and refreshments, will be approximately \$55.00 per person. I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned events are 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 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 sponsor, 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 food and refreshments they consume and any gift items accepted for themselves.

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 Orbital will be distributing a mission patch, magnet, and decal, and a beach towel, the total value of which is under \$20.



Adam F. Greenstone