

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



March 10, 2014

Reply to Attn of General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Guidance Regarding Attendance by NASA Employees at the 2014 SLS-Orion Suppliers' Conference from March 11-12, 2014 in Washington, D.C.

On March 11 and 12, 2014, ATK, Lockheed Martin, Boeing, and Aerojet Rocketdyne will host the annual SLS-Orion Suppliers' Conference at the Reserve Officer's Associate Building in Washington, D.C., with a reception in the cafeteria of the Longworth House Office Building. The purpose of the conference is to inform SLS and Orion suppliers of the current status of the programs. The event will consist of conference presentations and discussions over the two days, with a luncheon on the first day and a reception the first evening.

Over 200 people have been invited to attend the event, including NASA employees, members of Congress, Congressional staff, and representatives from industry. The estimated average value of refreshments served at the event, including all food and beverages, is \$25.00 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 on NASA's programs and policies. Accordingly, except as explained below, NASA employees whose duties do not substantially affect the sponsor, or a majority of its members, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, or who receive an invitation from an organization other than the event sponsor, 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. Moreover, employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490 who attend must reimburse the sponsors the value of any refreshments they consume, other than refreshments they receive in plenary events on the same day they present information through scheduled remarks at the conference.

A handwritten signature in blue ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone