

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 6, 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 SLS/Orion Suppliers' Conference and Reception on March 25-26, 2015

On March 25 and 26, 2015, Boeing Company, Lockheed Martin, Aerojet Rocketdyne, and Orbital ATK, 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 Rayburn Cafeteria and Courtyard. 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 on the first evening.

Approximately 200 people have been invited to attend, including members of Congress and their staff, personnel from the academia and industry, and employees of other Federal agencies. The estimated average value of refreshments served at the event, including all food and refreshments, \$25 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 food and refreshments they consume.*

Adam F. Greenstone

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over the printed name.