

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



October 18, 2013

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 Space Policy Institute Reception on October 21, 2013

On October 21, 2013, the Space Policy Institute of George Washington University's (GWU) Elliott School of International Affairs, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, along with NanoRacks, LLC, will hold a reception, *Celebrating Cooperation on the International Space Station*, at the City View Room, 7<sup>th</sup> Floor, 1957 E Street, NW, Washington, D.C., from 5:30 PM to 7:30 PM. The purpose of the event is to celebrate international cooperation on the International Space Station (ISS).

Approximately 100 people are expected to attend the event. Attendees will include representatives from academia, congressional staff, other federal agencies, and industry. The estimated cost of the event, including all food and beverages, is approximately \$42 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 discuss NASA's programs and policies, and hear thoughts and experiences concerning ISS utilization from representatives of various research communities. Accordingly, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event 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 this event from their local ethics counselor.

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

Adam F. Greenstone