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

February 11, 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 Space Policy Institute Luncheon on March 03, 2014

On March 03, 2014, the Space Policy Institute (SPI) 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, will hold a luncheon in the Linder Family Common Room, at the Elliott School of International Affairs, 1957 E Street NW, Washington, DC, from 11:30 am to 2:00 p.m. The purpose of the event is to discuss the role of international space cooperation in advancing U.S. foreign policy objectives.

Approximately 80 people are expected to attend the event. Attendees will include personnel from other federal agencies, congressional members and staff, and representatives from academia, the media, foreign embassies, and industry. The estimated cost of the event, including all food and beverages, is around $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 on NASA's programs and policies.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, 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.

However, NASA employees whose duties may substantially affect the event sponsor, 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.

Adam F. Greenstone