National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

May 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 Space Transportation Association (STA) Luncheon on May 7, 2014

On May 7, 2014, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon in the Senate Office Building, Russell 385, Washington, D.C., from 11:30 a.m. to 1:30 p.m.

Approximately 300 people have been invited to attend, including Congressional members and staff, media, aerospace industry representatives, and employees of other Federal agencies. The estimated cost of the luncheon, including all food and beverages, is $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 various NASA programs.

NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the STA or a majority of its members, may accept an invitation for free attendance to the luncheon for themselves.

However, NASA employees whose duties may substantially affect the STA or a majority of its members, 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.

for Adam F. Greenstone