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

March 12, 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 Southwest Research Institute's Launch Viewing Reception on March 12, 2015

On March 12, 2015, Southwest Research Institute (SwRI), a 501(c)(3) non-profit organization, along with Delaware North Corp. Parks and Resorts, will host a launch viewing reception at Kennedy Space Center (KSC), Apollo/Saturn V Center, 8:00 p.m.-10:15 p.m. for the Magnetospheric Multi-scale (MMS) mission.

Approximately 1,900 people were invited to attend the event, including representatives from the legislative branch, state and local government, other Federal agencies, academia and industry. The estimated cost of the event, including all food and beverages, is $20.50 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 and the Agency's policies and plans.

Accordingly, NASA employees whose duties do not substantially affect the host, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation to this event. However, NASA employees whose duties may substantially affect the host, 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.

Attendees are reminded of the $20 gift exception at 5 C.F.R. §2635.204(a) which provides that employees may accept gifts valued at no more than $20 per occasion and no more than $50 from one source in a calendar year. SwRI will be providing a drawstring back pack, valued at $2.69, and an MMS decal, valued at $1.25

Adam F. Greenstone