

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



January 17, 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 Foundation Reception on January 21, 2014

On January 21, 2014, the Space Foundation, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a reception. This event will take place at the Embassy of Canada, 501 Pennsylvania Avenue, NW, Washington, DC, 20001, from 6 p.m. to 8 p.m. The purpose of the event is to highlight US-Canadian space cooperation.

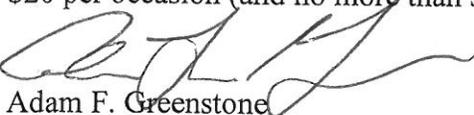
Approximately 370 people were invited to attend this stand up reception. Attendees will include Congressmen, congressional staff, industry executives, White House personnel, members of the national security space community, academia, media, as well as representatives from allied nations. The estimated cost of the event, including all food and beverages, is approximately \$20 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, or a majority of its members, 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 sponsor 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.

We understand that the Space Foundation will be handing out a small gift item valued at less than \$20 (a \$5.00 coin and a \$1.00 poster). 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).

  
Adam F. Greenstone