National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 14, 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 Washington University Reception hosted by the Washington University, on April 21, 2015

On April 21, 2015, the McDonnell Center for the Space Sciences, Washington University, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Goldberg Lounge, Danforth University Center, Washington University Campus, at 6:15 p.m. The event is to provide an opportunity for the attendees at the Planetary Data System Management Council Meeting to meet and discuss issues of mutual interest in planetary data discovery, display and analysis.

Approximately 36 people are expected to attend. The estimated cost of the event, which includes all food and beverages, is $25.00 per person. The event will be attended by representatives from industry and academia, and personnel from various NASA centers. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendance at the reception will allow NASA representatives to exchange views and ideas on planetary data management with others in attendance. Accordingly, NASA employees whose duties do not substantially affect the Washington University – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – may accept an invitation from the Washington University for free attendance to the reception.

Moreover, NASA employees whose duties may substantially affect the Washington University, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

for

Adam F. Greenstone