

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

November 15, 2013



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 Worcester Polytechnic Institute Reception on November 19, 2013

On November 19, 2013, Worcester Polytechnic Institute (WPI), a non-profit university under Section 501(c)(3) of the IRS Code, will host a reception at the Library of Congress, James Madison Memorial Building, Montpelier Room, 6<sup>th</sup> floor, Washington, DC, from 6:30-8:30 p.m.

Approximately 150 are expected to attend. This event will include representatives from Congress, academia, other Federal agencies and the media. The estimated cost of the event, which includes all food and beverages, is \$40. I find that this event meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. §2635.204(g)(2). I have determined that free attendance at the above-mentioned event is in the interest of the Agency, because it will further agency programs and operations.

Accordingly, NASA employees whose duties do not substantially affect the event 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 free attendance to the event for themselves and their accompanying guest.

However, NASA employees whose duties may substantially affect the 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.

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). We understand that WPI may hand out a small photo collection with a minimal value worth less than \$20.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone