

National Aeronautics and
Space Administration
Lyndon B. Johnson Space Center
2101 NASA Parkway
Houston, Texas 77058-3696



September 2, 2014

Reply to Attn of: AL-14-067

TO: Health and Human Resources Directorate

FROM: AL/ Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance to Baylor College of Medicine, Center for Space Medicine Reception for Members of the NASA Health and Human Performance Center

On September 18, 2014, NASA and the Houston Technology Center will host a workshop called "Innovation through Co-Development: Engaging Partners" for NASA Health and Human Performance Center (NHHPC) members at the Houston Technology Center Conference Center 410 Pierce St., Houston, TX. Topics include discussion of models for co-development that advance innovation and how to successfully engage partners and stakeholders, and to discuss global strategies for collaborative innovation. The program features speakers from industry, government, and academia; an expert panel discussion on successes and challenges of co-development efforts across all sectors; and interactive breakout sessions.

Baylor College of Medicine will host a networking reception the evening before from 6-8PM. The reception will be held at Center for Space Medicine Baylor College of Medicine & National Space Biomedical Research Institute, 6500 Main Street, Suite 910, Houston, TX 77030-1402. Baylor has invited all NHHPC members participating in the workshop to the reception. Approximately 100 people are expected to attend. Attendees will include members from industry, research/science, education and government. The estimated cost of the event including all food and beverages is approximately \$41.00 per person. This event will provide NASA personnel and other attendees with the opportunity to share best practices and discuss future initiatives and innovations in the areas of human health and performance with a workshop-specific focus on the acceleration of innovation in the health and human performance field.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2). This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities.

It is my determination that it is in the Agency's interest for NASA invitees and their guests to attend the Baylor College of Medicine reception. I have considered the importance of this event to the Agency, the purpose of this event, the identity of other expected participants, and the market value of the gift of free attendance at the event to the NASA invitees. After considering these factors, I have determined that the Agency's interest in attendance by invited NASA employees at this event outweighs any concern that the acceptance of any benefits may, or may appear to, improperly influence any NASA employee in the performance of their official duties. Accordingly, NASA invitees whose duties do not substantially affect Baylor College of Medicine are authorized to attend and to accept any food and refreshments offered in conjunction with this event for themselves and their invited spouses or guest.

NASA employees whose duties may substantially affect Baylor College of Medicine or who are in non-career positions for which Executive Order 13490 of January 21, 2009 requires signing an ethics pledge, are not covered by this determination and should seek an individualized ethics determination from the Office of Chief Counsel regarding participation in this event pursuant to 5 C.F.R. §2635.204(g)(3)(i).

A handwritten signature in black ink, appearing to read "Suratt", with a large, stylized flourish extending to the right.

Randall T. Suratt, Attorney Advisor