

National Aeronautics and Space
Administration

Headquarters
Washington, DC 20546-0001



November 6, 2019

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees
at the Third Women in STEM Roundtable on November 7, 2019

On November 7, 2019, Science Applications International Corporation (SAIC) and Bowie State University (BSU) will host a roundtable discussion event at the BSU's campus in Bowie, Maryland from 8:00 a.m. to 6:00 p.m. The roundtable, for which NASA is a secondary sponsor, is to discuss strategies and techniques to advance cultural change within respective organizations to create workplace environments conducive to supporting and sustaining women in science, technology, engineering and mathematics (STEM) roles.

Over 1000 people are invited, including representatives from government, academia, industry, non-profit organizations and local businesses. The estimated value of the food and beverages to be provided at the event is approximately \$40 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). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency discussions and programs. Attendance at the event will allow NASA representatives to exchange views, ideas, achievements, lessons learned, and best practices with others in attendance. Accordingly, NASA employees whose duties do not substantially affect SAIC or BSU, with the exceptions noted below, may accept a free invitation to the roundtable.

However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13770 may only attend if they reimburse the hosts the value of the event. Additionally, NASA employees who have a significant role in any pending matter affecting the interests of SAIC or BSU, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation under the widely attended gathering exception. NASA employees not covered by this determination may also attend without reimbursing the hosts if they are a scheduled roundtable speaker.

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

Adam F. Greenstone