

National Aeronautics and Space Administration

Mary W. Jackson Building NASA Headquarters
Washington, DC 20546-0001



April 20, 2022

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the
H2M Summit 2022 and surrounding events on May 17-19, 2022

On May 17-19, 2022, the Explore Mars, Inc., a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the Human to Mars Summit 2022 at the Butts Auditorium, George Washington University in Washington, DC. Explore Mars is in control of the plans and invitations for the Summit program events unless otherwise indicated. The purpose of the event is to bring experts from around the world together to provide a forum for discussions on the technical, scientific, and policy challenges of sending humans to Mars in the upcoming decades. Attendees will include representatives from the legislative branch, industry, government agencies, media, entertainment community, non-profit organizations, STEM educators, and academia.

Approximately 400 people are expected to attend the event. The program will include three breakfasts, three coffee break snacks, one lunch, and two receptions. Breakfast will be available from approximately 8:00 a.m. to 8:45 a.m. each day, estimated cost of the breakfast \$15.00 per person each day. Coffee and snacks will be available from approximately 10:15 a.m. to 10:45 a.m. each day, estimated cost of the coffee break and snacks \$15.00 per person each day. The program will include a reception on May 17 from 5:45 p.m. to 7:30 p.m. at the GWU Ballroom in Washington, DC, estimated cost is \$25 per person. The program will include a lunch on May 18 from 1:30 p.m. to 2:00 p.m. in the GWU Ballroom in Washington, DC, estimated cost is \$65 per person. There is an evening reception from 6:30 p.m. to 8:00 p.m. at the City View Room at GWU in Washington, DC, estimated cost is \$75 per person. Attendance at these events will allow NASA attendees to exchange information regarding various NASA program.

I find that these events meet 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 these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA's policies, programs and operations. Accordingly, NASA employees—including non-career employees subject to

Executive Order 13989—who do not have a significant role in a matter affecting the interests of Explore Mars may accept an invitation for free attendance to the events where complimentary invitations have been issued. In those circumstances, I find that the Agency's interest in attendance outweighs any concern that the individual may be, or may appear to be, improperly influenced in the performance of their duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of Explore Mars, 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 of free attendance to the event. Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone