

National Aeronautics and
Space Administration

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



November 12, 2021

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Pre-Launch Reception and Dinner on November 14 in conjunction with the American Institute of Aeronautics and Astronautics ASCEND Conference on November 8-17, 2021

The American Institute of Aeronautics and Astronautics (AIAA), a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold the ASCEND Conference during November 8-17, including a pre-launch in-person reception and dinner for the Guiding Coalition, students, and early/mid-career professionals on November 14, at the Caesars Forum Plaza, 3911 Koval Lane, Las Vegas, NV 89109, starting at 6:00 p.m., PST. AIAA is in control of the planning, organizing, and issuing invitations for this event.

Approximately 50 people are expected to attend the reception and dinner. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is approximately \$120-170 per person. Attendance will allow NASA attendees to exchange information regarding various NASA programs. I find that the event meets the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having invited NASA personnel attend the reception and dinner because it will provide an opportunity to exchange ideas and views pertaining to NASA’s policies, programs and operations.¹ NASA employees — including in non-career positions who are required to sign an ethics pledge under Executive Order 13989 — who do not have a significant role in a matter affecting the interests of AIAA may accept an invitation for free attendance to the event. 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.

¹ This widely attended gathering determination does not address in person attendance at the substantive sessions of the ASCEND conference by NASA employees on official travel, including for which may have been separately authorized under reimbursable travel orders. NASA employees who are speaking at an ASCEND conference session may attend that day’s conference program in person without further formality under the speaker’s exception.

However, NASA employees who have a significant role in any pending matter affecting the interests of the sponsor, 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. 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