

National Aeronautics and
Space Administration

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



November 4, 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 events in conjunction with the American Institute of Aeronautics and Astronautics ASCEND Conference on November 8-17, 2021

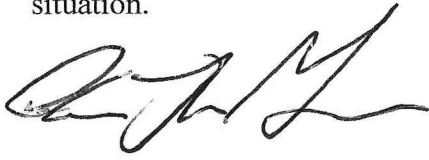
The American Institute of Aeronautics and Astronautics (AIAA), a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold the ASCEND Conference during November 8-17, with one day (November 15) live in person at the Ronald Reagan Building, Rotunda Room in Washington, DC, from 10:30 a.m. to 3:30 p.m. AIAA is in control of the planning, organizing, and issuing invitations for this event. The invitation includes lunch, two snacks, and evening reception on the 15th, as well as internet access for streaming sessions on November 1 through 8, 16 and 17, 2021, plus 30 days of on-demand sessions, and the COVID-19 health and safety protocol fees.

Approximately 100 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, members of the legislative branch, and representatives from academia, and industry. The estimated cost of the event, including all food, beverages and items listed above, is approximately \$650 per person. Attendance at this event 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 NASA personnel attend the event because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs and operations. NASA employees — including NASA employees 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 AISS 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.

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