

National Aeronautics and  
Space Administration

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



February 25, 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 American Institute of Aeronautics and Astronautics Awards Gala Dinner on April 27, 2022

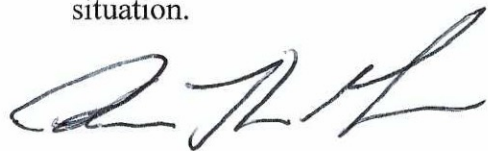
The American Institute of Aeronautics and Astronautics (AIAA), a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a Awards Gala Dinner on April 27, 2022, at the Ronald Reagan Building and International Trade Center in Washington, DC, from 5:30-10:00 p.m. AIAA is in control of the planning, organizing, and issuing invitations for this event. The invitation includes a reception, dinner, and an awards ceremony.

Approximately 400 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 and beverages is approximately \$160 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 AIAA may accept an invitation for free attendance to the event for themselves and a guest. 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 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone