

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001



April 30, 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 American Institute of Aeronautics and Astronautics Aerospace Reception on April 30, 2019

On April 30, 2019, the American Institute of Aeronautics and Astronautics (AIAA), a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the Rayburn House Office Building in Washington, DC from 5:00 p.m. – 7:00 p.m. The event is to provide a venue for informal discussion on current challenges the aerospace community is facing. The event will provide a forum for discussion of the 2019 International Aeronautical Congress Conference.

Approximately 125 people have been invited to attend the dinner reception. Attendees will have a diversity of views or interests and will include representatives of the legislative branch, personnel from academia, industry representatives, employees of other Federal agencies, foreign nationals, members of the public, and media. The estimated value of the event, including all food and beverages, is \$40 per person. The AIAA is in control of the all the planning and invitation for the event.

Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. There is also 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. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the AIAA—including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13770—may accept an invitation from the AIAA for free attendance to this 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 AIAA, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, or who receive an invitation from a party other than the event host, AIAA, should seek a separate determination from their local NASA ethics office as to whether they may accept the invitation.

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

Adam F. Greenstone