

National Aeronautics and  
Space Administration



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

February 23, 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 Christopher Newport University Dinner and Lecture on February 23, 2022

On February 23, 2022, Christopher Newport University (CNU), a non-profit State public university, will hold a dinner at the University President's House in Newport News, VA, at 5:30 PM; and then a lecture in the Diamonstein Concert Hall at the Ferguson Center for the Arts, 1 Avenue of the Arts, Newport News, VA 23606, at 8 PM. The NASA Administrator and Deputy Administrator are invited to speak to the President's Leadership program. The dinner preceding the lecture is to allow the speakers and others in attendance to share information on NASA missions and STEM education.

Approximately 30 people are expected to attend the event. Attendees will have a diversity of views or interests and will include personnel from academia, local business leaders, presidents of other universities, and elected officials. The estimated cost of the event, including all food and beverages, is approximately \$55 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 CNU 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.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone