

National Aeronautics and  
Space Administration

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



July 30, 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 Federal 100 Awards Gala on August 27, 2021

On August 27, 2021, the Federal Computer Week (“FCW” - a publication of Public Sector 360) will host an awards gala at the Grand Hyatt in Washington, DC from 5:00 p.m. – 10:00 p.m. The event is to provide a venue for informal discussion on current challenges the aerospace community is facing. At the dinner, awards will be presented to various individuals and teams for outstanding contribution in the Federal Information Technology community.

Approximately 700 people have been invited to attend the awards dinner gala. Attendees will have a diversity of views or interests and will include members of the legislative branch, personnel from academia, industry representatives, employees of other Federal agencies, state and local government officials, and members of the media. The estimated value of the event, including all food and beverages, is \$155 per person. The FCW is in control of the all the planning and invitations 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 FCW—including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989—may accept an invitation from the FCW for free attendance for themselves and a guest 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 FCW, 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, FCW, should seek a separate determination from their local NASA ethics office 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