

National Aeronautics and
Space Administration

John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



October 1, 2021

Reply to Attn of: G

TO: Distribution

FROM: G/Deputy Designated Agency Ethics Official, Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ohio Aerospace Institute's (OAI) "An Evening with the Stars: Celebrating 80 Years of Pushing Boundaries and Breaking Barriers"

The OAI, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host "An Evening with the Stars: Celebrating 80 Years of Pushing Boundaries and Breaking Barriers" at Cleveland State University's Student Center Ballroom in Cleveland, Ohio on October 27, 2021, from 6:30 to 10:30 p.m. This event will focus on increasing awareness of GRC's unique contributions to research and areas of technology with high priority and relevant to the nation and the state, with presentations by Daniel Dietrich, Othmane Benafan, and Raymond Castner. The agenda also includes opening remarks from Dr. Marla Pérez-Davis, and tentatively a NASA Headquarters representative.

The OAI will be inviting approximately 200 people to this event and will be covering its estimated cost of \$65 per person, which includes appetizers, coffee and light desserts, along with a cash bar. Attendees will hear a diversity of views or interests from business leaders, Congressional leaders, academia, NASA personnel, and employees of federal agencies. I have determined 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 programs and operations. I find that the event meets the requirements of a "widely attended gathering" as defined by 5 C.F.R. 2635.204(g)(2).

The NASA employees, including those employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989, who do not have a significant role in a matter affecting the interests of the sponsor, may accept the 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 concerns that the individual may be, or may appear to be, improperly influenced in the performance of his or her duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of OAI, 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.

Callista M. Puchmeyer

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