

National Aeronautics and
Space Administration

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



May 31, 2022

Reply to Attn of: G

TO: Distribution

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

SUBJECT: Determination Regarding Attendance by NASA Employees at the Ohio Aerospace Institute's (OAI) "An Evening with the Stars: From Beginning to Beyond"

The OAI, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host "An Evening with the Stars: From Beginning to Beyond" at NASA Glenn Research Center (GRC) in Cleveland, Ohio on August 30, 2022, from 5:30 p.m. 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 Anne Mills, Mary Wadel, and John Hamley. The agenda also includes opening remarks from GRC leadership, and tentatively a NASA Headquarters representative.

The OAI will be inviting approximately 250 people to this event and will be covering its estimated cost of \$65 per person, which includes appetizers, coffee and light desserts. 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.

Callista M. Puchmeyer

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