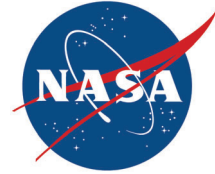


National Aeronautics and Space Administration

**Lyndon B. Johnson Space Center**  
2101 NASA Parkway  
Houston, TX 77058-3696



April 1, 2022

Reply to Attn of: AL-22-016

TO: Distribution

FROM: AL/Deputy Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the RNASA Awards Dinner and Stellar Awards Luncheon on April 29, 2022

On April 29, 2022, the Rotary National Award for Space Achievement (RNASA) Foundation, a nonprofit organization under section 501(c)(4) of the Internal Revenue Code, will host an awards dinner at the Hyatt Regency Houston in Houston, Texas, at 6:00 pm. The RNASA Foundation does not employ registered lobbyists, and is a distinct organization from, and not controlled by, the Rotary Foundation of Rotary International. Its operations are conducted by a committee of 22 individuals, over three-quarters of whom are not NASA employees, and the trophy winner is selected by a board of advisors composed of eminent individuals from government, industry, and media, including former winners. The RNASA Foundation was founded by the Space Center Rotary Club of Houston, Texas, in 1985 to recognize achievements in space and create greater public awareness of the benefits of space exploration.

The estimated value of the dinner, including all food and drinks, is approximately \$300 per person. At the dinner, awards will be presented to various individuals for accomplishments in spaceflight, engineering, science, management, and education. RNASA is in control of all the arrangements and invitations for the event.

Approximately 650 people are expected to attend this event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, Congressional members and staff, members of the media, academia, and industry. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs with attendees from other organizations.

Additionally, the Stellar Award nominees are to a luncheon hosted by RNASA on the same day. The estimated value of the lunch, including all food and drinks, is approximately \$27 per person. Approximately 120 people are expected to attend the luncheon. Attendees will have a diversity of views or interests and will include personnel from other federal agencies

and industry. The Stellar Award nominees will receive a pen, book, and certificate for a total value of \$20. The winner of the Stellar Award will receive a trophy valued at \$180.

I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). I further determine that there is 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.

Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of RNASA - including NASA employees who are non-career employees subject to Executive Order 13989 - may accept an invitation for free attendance for themselves and a guest 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 whose duties have a significant role in any matter affecting the interests of RNASA, such as procurement duties, program management, or negotiating a Space Act Agreement, should seek a separate determination from their local ethics counselor as to whether they may accept the invitation.

**Randall Suratt** Digitally signed by Randall Suratt  
Date: 2022.04.01 11:09:13 -05'00'

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Randall T. Suratt

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