

National Aeronautics and
Space Administration

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



January 7, 2021

Reply to Attn of: CC

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Canaveral Council of Technology Societies' (CCTS) 48th Spaceport Summit/SpaceCom, January 11-12, 2022

CCTS, a nonprofit organization under section 501(c)(3) of the Internal Revenue Code, will host the 48th Spaceport Summit/SpaceCom Conference January 11-12, 2022, at the Rosen Shingle Creek Hotel in Orlando, Florida. CCTS has partnered with SpaceCom to host this conference. The Spaceport Summit provides a forum for discussing current space initiatives, including relevant panel discussions and speakers, with a diverse audience that includes aerospace professionals, academia, students and members of the general public. The conference will be held daily from approximately 9:00 a.m. to 5:30 p.m.

Approximately 2000 guests have been invited to the conference. Invitees include local government officials, NASA and other Federal agency personnel, and representatives from industry, media, academia, and the general public. The face value of the two-day registration, which includes two breakfasts, two box lunches, and one reception, is \$595. Attendance at these events will allow NASA attendees to exchange information regarding various NASA programs. I find that the events meet 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 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. NASA employees who do not have a significant role in a matter affecting the interests of the organization hosting the events may accept an invitation for free attendance, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989. 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 host, 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. Also, this determination does not apply to NASA employees on travel to attend the event. Employees on official travel to attend

this event must obtain approval to accept complementary registration as a gift from a non-federal source pursuant to 31 U.S.C. §1353 and NASA Form 1167.¹

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion, and no more than \$50 from one source in a calendar year. We understand that CCTS will be distributing a cloth patch valued at \$5 and a gift bag valued at \$10 from the sponsors of the SpaceCom Conference. Invitees may accept the gifts valued at \$15 as long as they do not violate the \$50 annual cap.

Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.



Adam Greenstone

¹ NASA employees speaking for NASA at the conference may accept free attendance on the day they are speaking pursuant to 5 C.F.R. § 2635.203(b)(8)(i) whether their duty station is at KSC or they are on official travel. This determination does apply to NASA employees who are on official travel to KSC for other purposes, such as but not limited to extended temporary duty assignments.