

National Aeronautics and
Space Administration



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

August 9, 2021

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at NG-16 Commercial Resupply Service Mission Launch Events hosted by Northrop Grumman on or about August 10, 2021

Northrop Grumman is scheduled to launch the NG-16 Commercial Resupply Service (CRS) Mission on an Antares launch vehicle from NASA's Wallops Flight Facility at Wallops Island, Virginia, currently scheduled for approximately August 10, 2021. The event includes snacks, dessert and beverages at the launch viewing site.

Approximately 800 guests have been invited to attend. Invitees include members of the legislative branch, state and local government officials, industry representatives, academia, and personnel from other Federal agencies. The value of the event, which includes all food and refreshments, will be approximately \$7 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance for themselves and a guest to this event.

However, NASA employees whose duties may substantially affect an event sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13989 requires signing an ethics pledge may only accept the snacks, cake and wine toast if they reimburse the sponsor the value of the event and any gift items accepted for themselves and their guest.

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 Northrop Grumman will be distributing a mission patch (\$2.55) and decal (\$1.16), a lanyard (\$3.07), the Northrop

Grumman bag (\$2.75), and a pair of Antares socks (\$6.50), the total value of which is \$16.03. NASA employees in non-career positions who have signed the ethics pledge may accept the mission patch and decal; however, they may only accept the other items if they reimburse the sponsor (\$12.32 for all other items). Attendees are reminded to exercise any COVID-19 precautions appropriate to their individual situation.

A handwritten signature in black ink, appearing to read 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone