

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:** Agency Counsel for Ethics

**SUBJECT:** Determination Regarding Attendance by NASA Employees at the RNASA Awards Dinner and Stellar Awards Luncheon on September 3, 2021

On September 3, 2021, the Rotary National Award for Space Achievement (RNASA) Foundation, a nonprofit organization under section 501(c)(4) of the Internal Revenue Code,<sup>1</sup> will host an awards dinner at the Hyatt Regency Houston in Houston, Texas, at 6:00 p.m. 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 800 people are expected to attend this event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, members from the legislative branch, members of the media, academia, industry, and representatives from international partner organizations. 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 invited to tour Johnson Space Center followed by 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 200 people are expected to attend the luncheon. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, the media, academia, 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.

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<sup>1</sup> 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 36 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.

I find that these event meets 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 for free attendance.

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

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a large initial "A" and "G".

Adam F. Greenstone