

National Aeronautics and Space Administration



Headquarters
Washington, DC 20546-0001

December 16, 2019

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance at the Senior Executive Association
2019 Presidential Rank Awards Leadership Summit, December 17, 2019

On December 17, 2019, the Senior Executive Association (SEA) will host the Senior Executive Association 2019 Presidential Rank Awards Leadership Summit at the Mayflower Hotel in Washington, D.C. SEA and the Federal Executive Institute Alumni Association (FEIAA), with which SEA has coordinated with on certain aspects of the activity, are in control of the organizing and planning, and Summit invitations.¹ The purpose of the event is to bring experts together with distinguished members of the Federal service together for training and discussions on innovative technologies, techniques and practices. Approximately 500 people are expected to attend the day portion of the Summit, which will include a breakfast and the presentation of awards during the luncheon. The estimated value of the day program is \$250 per person. SEA will also host a dinner program to which at least 120 Summit invitees are also invited, to honor this year's Presidential Rank awards recipients, valued (depending on SEA membership at between \$175-\$400 per person). Attendance at these events will allow attendees to share information regarding various NASA programs, and to gain information on new approaches and best practices to use at NASA.

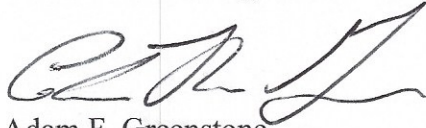
I further determine there is an Agency interest in having NASA personnel attend these events because they will enable attendees to exchange ideas and views pertaining to NASA's policies, programs and operations. Attendees will include representatives from industry, non-profit organizations and academia, in addition to distinguished Federal workforce members. Accordingly, NASA employees – including NASA employees in non-career positions required to sign the ethics pledge under Executive Order 13770 - who do not have a significant role in a matter affecting the interests of the SEA and/or FEIAA

¹ Some invitations were issued in a cooperative effort between SEA and FEIAA to enable certain recipients to attend—at no additional cost to FEIAA—a day of training, including the breakfast and award luncheon. Invitations issued in conjunction with this cooperation between the organizations are considered to be provided by the sponsor(s) of the event for purposes of U.S. Office of Government Ethics regulations on the widely attended gathering exception.

may accept an invitation for free attendance to this 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 who have a significant role in any pending matter affecting the interests of any of the organizers, 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 for this event.

Award winners may accept the trophy presented to them in recognition of their achievement. Congratulations to NASA's award winners!

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

Adam F. Greenstone