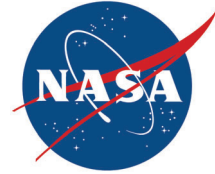


National Aeronautics and Space Administration

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



April 3, 2023

Reply to Attn of: AL-23-009

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 28, 2023, the Rotary National Award for Space Achievement (RNASA) Foundation, a nonprofit organization under section 501(c)(4) of the Internal Revenue Code, will host their annual awards banquet at the Hyatt Regency Houston in Houston, Texas. The awards banquet includes the presentation of RNASA's National Space Trophy and the Stellar Awards. The awards banquet will begin with a reception at 6 p.m., followed by dinner and the awards ceremony beginning at 7 p.m.

The RNASA Foundation does not employ registered lobbyists, and is a distinct organization from, and not controlled by, the Rotary Foundation of Rotary International. The RNASA 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. Approximately 720 people are expected to attend this event. At the dinner, awards will be presented to various individuals for accomplishments in spaceflight, engineering, science, management, and education. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, Congressional members and staff, local officials, 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. RNASA is in control of the invitations and arrangements, including seating, for the event.

Additionally, the Stellar Award nominees are invited 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, 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.

I find that these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). This event is of interest to NASA and will serve as a forum for facilitating the widest practicable dissemination of information concerning the Agency and its activities. This event will further Agency programs or operations including promoting community relations and providing the opportunity for the exchange of views and information between leaders within the Agency and leaders within the space-related industry and the community. 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.

NASA employees whose duties may 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. Additionally, employees who receive an award should contact their local ethics counselor regarding acceptance of the award.

Randall Suratt Digitally signed by Randall Suratt
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Randall T. Suratt

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