

National Aeronautics and  
Space Administration



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

July 12, 2023

Reply to Attn of: General Law Practice Group

TO: Adam Greenstone

FROM: Ethics Attorney Advisor

SUBJECT: Determination Regarding Attendance by NASA Employees at the events in conjunction with the 2023 ECI Fellows Meeting on July 12–14, 2023

The Ethics and Compliance Initiative (ECI) will hold the 2023 Fellows Meeting on July 12-14, 2023, at the Grand Hyatt Washington, 1000 H. St. NW, Washington, DC. from 4:00 p.m. to 8:30 p.m. on July 12, from 8:00 am to 7:30 pm on July 13, and from 7:30 a.m. to 11 a.m. on July 14. The Meeting is entitled “Catalyzing Ethical Leadership and Good Governance” It is a substantive conference focused on ethics and compliance leadership. Attendance will include a reception and dinner on July 12<sup>th</sup>, breakfast, lunch, and dinner on July 13<sup>th</sup>, and breakfast on July 14<sup>th</sup>. ECI is in control of the planning, organizing, and issuing invitations for this event. ECI is comprised of two non-profits: the Ethics and Research Center (a 501(c)(3) non-profit organization) and the Ethics and Compliance Association (a 501(c)(6) non-profit organization).

Approximately 70 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members of Congress, Executive Office of the President staff, trade association representatives, personnel from other federal agencies, members of the legislative branch, and representatives from media and industry. The complimentary cost of the event, including all food and beverages, is valued at \$50 per person. Attendance at this event will allow NASA attendees to exchange information with other attendees regarding ethics and other NASA programs. I find that the event meets 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 the event because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs and operations. Therefore, you may accept an invitation for free attendance at the event, based on the understanding that you do not have a significant role in a matter affecting the interests of the sponsor. In those circumstances, I find that the Agency’s interest in attendance outweighs any concern that you may be, or may appear to be, improperly influenced in the performance of your duties. You are reminded to exercise any COVID-19 precautions appropriate to your individual situation.

Kathleen (Katie) Spear