

National Aeronautics and
Space Administration

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



December 13, 2023

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the Women in Aerospace Reception and Awards Dinner on December 13, 2023

On December 13, 2023, the Women in Aerospace (WIA), a nonprofit organization under section 501(c)(6) of the Internal Revenue Code, will host the 38th Annual Women in Aerospace Awards Dinner & Ceremony a cocktail reception followed by dinner at the Ritz-Carlton, Pentagon City, 1250 South Hayes Street, Arlington, Virginia, from 6:00 p.m. to 9:30 p.m. WIA is in control of the organizing, planning, and sending of invitations to this event. The event honors women's outstanding contributions to the aerospace community.

Approximately 300 people are expected to attend this event. Attendees will have a diversity of views or interests and will include personnel from other federal agencies, representatives of the U.S. legislative branch, state and local officials, representatives from the media, academia, industry, and international partner organizations. The estimated value of the reception and dinner, including all food and drinks, is approximately \$200.00 for WIA Members and \$250.00 for Non-Members. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs with attendees from other organizations. 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.

NASA employees — including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 — who do not have a significant role in a matter affecting the interests of WIA may accept an invitation for free attendance 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 WIA, 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.

Adam F. Greenstone