

National Aeronautics and
Space Administration



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

January 3, 2024

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the IDGA 17TH
Annual Homeland Security Summit on January 23 – 24, 2024

On January 23 – 24, 2024, Institute for Defense Government Advancement (IDGA) with sponsors Point Blank Enterprises, Axon Enterprise, Skydio, OpenText, Echodyne, and ManTech will host a conference lunch at the Marriott Crystal Gateway Hotel, 1700 Richmond Hwy, Arlington, VA 22202. This event has continually brought together the top minds in the homeland defense and security spheres at our Homeland Security Week event for thought leadership, industry collaboration, and the development of best practices. IDGA is in control of planning and organization of this event.

Over 400 people have been invited to attend. Attendees will have a diversity of views or interests and will include Congressmen and staffers, state and local officials, representatives from industry, international agency partners, professional society representatives, research consortia representatives, employees of Federal agencies, and members of the public. The estimated cost of the event, including all food and beverages, is \$37.50 per person (per day). I have determined 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 information, ideas and views pertaining to NASA's policies, programs, and operations. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

NASA employees who do not have a significant role in a matter affecting the interests of the sponsors 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 in non-career positions who are required to sign the ethics pledge under Executive Order 13989, may only attend the event if they reimburse the sponsors the value of the event.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of IDGA 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.

Adam F. Greenstone