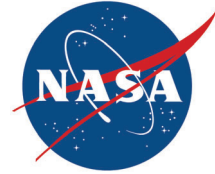


National Aeronautics and Space Administration

John F. Kennedy Space Center
Kennedy Space Center, FL 32899



February 12, 2024

Reply to Attn of: CC

TO: Distribution

FROM: CC/Acting Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the 2024 Business Development Board (BDB) of Palm Beach County National Engineer's Week Honors and Awards Banquet

On February 13, 2024, Aerojet Rocketdyne, Pratt & Whitney, Power Systems Manufacturing, Florida Power and Light, EXP Engineering, and Belcan, LLC will host a reception and dinner at the Raymond F. Kravis Center in West Palm Beach, Florida. The event is to provide a venue for informal discussion for representatives from industry, NASA personnel, and others, as well as for an engineering professionals awards recognition dinner.

The hosts have invited over 300 persons to attend. Attendees will have a diversity of views or interests and will include award recipients from sponsoring and non-sponsoring companies, their guests and nominators, academia, members of the BDB of Palm Beach County, and members of the public. The estimated cost of the event, including all food and beverages, is \$125 per person. The Engineer's Council is the award provider for the event. Attendance at this event will allow NASA attendees to exchange information regarding various 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.

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 his or her duties. However, NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989 may attend the event only if they reimburse the sponsor the value of the event.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of Aerojet Rocketdyne, Pratt & Whitney, Power Systems Manufacturing, Florida Power and Light, EXP Engineering, or Belcan, LLC, 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.

Thomas Browder Date: 2024.02.12
16:32:52 -05'00'

Thomas M. Browder III