

National Aeronautics and
Space Administration



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

April 15, 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 Crowell & Moring's 9th Annual Women in Government Reception on April 16, 2024

On April 16, 2024, Crowell & Moring will host an event at the Crowell & Moring LLP, DC Office, 9th floor, 1001 Pennsylvania Ave., NW, Washington, D.C., 20004 from 5:30 to 7:30 p.m. The event is to provide a forum for discussion on innovation and technology. Crowell & Moring is in control of all the arrangements and invitations for the event.

Approximately 150 people are expected to attend the event. Attendees will have a diversity of views or interests and will include members from the legislative branch, personnel from federal agencies, and industry representatives. The estimated value of the event, including all food and drink, is approximately \$41.10 per person. 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 sponsor may accept an invitation for free attendance for themselves and a guest (if invited) 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 sponsor the value of the event.

Additionally, NASA employees who have a significant role in any pending matter affecting the interests of the Crowell & Moring, 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