

National Aeronautics and
Space Administration

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



September 15, 2025

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Concerning Attendance by NASA Employees at the Space
Foundation Hart Office Building Reception on Tuesday, September 16, 2025

On September 16, 2025, from 5:30 to 7:30 pm, the Space Foundation, a Section 501(c)(3) non-profit organization, will host an event at the Hart Office Building. The event is a reception without formal seating. The purpose of the event is to raise awareness for space activities for congressional members and staff. Approximately 300 invitations were circulated, and congressional members and staff, industry representatives, personnel from other federal agencies, and members of the public are expected to attend. The value of refreshments served will be approximately \$30 per person.¹

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 Space Foundation 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.

NASA employees who have a significant role in any pending matter affecting the interests of the Space Foundation, 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

¹ The Space Foundation has widely circulated information about the event and members of the public who are forwarded or receive the event announcement may register to attend without charge. Accordingly, NASA employees may also accept free registration to attend pursuant to 5 CFR § 2635.203(d).