National Aeronautics and Space Administration

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

April 29, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the Skyward Careers Award Luncheon

The Embraer Foundation and The Astronaut Memorial Foundation (AMF), will host the Skyward Careers Awards Luncheon at the KSC Visitor Center, Merritt Island, Florida, at 12 p.m. on May 1st, 2026. The event honors the mentors in Skyward Careers and highlights heroes to inspire the space and aviation workforce.

The hosts have invited over 125 people to attend. Attendees will have a diversity of views or interests and will include government officials, aerospace contractors, community leaders, local college and school representatives, and local media members. NASA invitees may bring one guest. The estimated cost of the event, including all food and beverages, is $30 per person. For those attending with a guest, the total estimated cost is $60. The Embraer Foundation and AMF are the primary organizers and sponsors for the event. 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.

NASA employees who have a significant role in any pending matter affecting the interests of The Embraer Foundation or AMF, 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.

You are reminded of the $20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than $20 for each occasion (and no more than $50 from one source in a calendar year). We understand that The Astronaut Scholarship Foundation will be offering a gift bag valued at approximately $20. Employees may accept any item(s) that are under or at the $20 gift exception rule.

Charles Vinson Digitally signed by Charles Vinson
Date: 2026.04.30 11:42:52 -04'00'

Alex Vinson
Agency Designee