



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

April 14, 2026

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA Employees at the 41st Space Symposium and concurrent events, April 13 – 16, 2026

On April 13– 16, 2026, the Space Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code will host the 41st Space Symposium in Colorado Springs, Colorado. Complementary Government registration will be covered under the authority of 31 U.S.C. §1353, Gifts of Travel From Non-Federal Sources, using NASA Form 1167. Invitations to additional events may have been provided by the sponsor. The Space Foundation is in control of the arrangements, invitations, and seating for most of the events taking place at the Broadmoor Hotel.¹ The following additional events will be held in conjunction with the Space Symposium:

1. On April 14, 2026, Astrolab will hold a reception from 3:30 p.m. to 5:30 p.m. at the Broadmoor Hotel in Bartolin Hall. Approximately 50 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and media. The estimated cost of the event, including all food and beverages, is approximately \$80 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Attendees may bring a guest.
2. On April 15, 2026, Houston First Corp. and Griffin Communications Group will co-host a reception from 4:30 p.m. to 6:00 p.m. in the Broadmoor Hotel, Lake Terrace Dining Room. Approximately 750 people are invited to attend. This event provides an opportunity for informal discussion with people who have diverse views or interests and will include people from other federal agencies and the legislative branch, representatives from industry, academia, and media. The estimated cost of the event, including all food and beverages, is approximately \$40 per person. Attendance at this event will allow NASA employees to exchange information regarding various NASA programs. Attendees may bring a guest.

I find that these events meet the requirements of a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend these events because it will provide an opportunity for the invited persons to exchange ideas and views pertaining to NASA’s policies, programs, and operations. Accordingly, NASA employees who do not have a significant role in a matter affecting the interests of the organization hosting the event as specified herein may accept an invitation for free attendance to that event, except as noted below. 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.ⁱⁱ For those events that are providing or offering gifts to attendees, NASA employees may accept these gifts under the \$20 gift exception set forth at 5 C.F.R. § 2635.204(a), that allows the employee to accept gifts not exceeding \$20 in the aggregate if the employee will not have accepted gifts from the one source exceeding \$50 in 2026.

Additionally, one guest of NASA employees may attend the events to which the employee and a guest have been invited. Also, NASA employees who have a significant role in any pending matter affecting the interests of any of the hosts of any event they wish to attend, 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.ⁱⁱⁱ

This widely attended gathering determination does not cover the receptions in hospitality suites that may occur during the 41st Space Symposium. These suites will be hosted by corporate sponsors. NASA employees who are invited may receive refreshments provided in these suites under the exception to the gift rules that allows acceptance of gifts (including refreshments and tangible gift items) with an aggregate value of \$20 or less per event. Attendees are reminded that this \$20 gift exception at 5 C.F.R. § 2635.204(a), allows acceptance of no more than \$50 from one source in a calendar year.

If employees have any questions on any individual event listed, please contact your local NASA ethics official.

Adam F. Greenstone

ⁱ Certain companies which support the symposium will provide very light snacks and non-alcoholic beverages during morning and afternoon breaks and at some breakout lectures or discussions. This modest fare is not considered a gift under Federal ethics requirements. See 5 C.F.R. § 2635.203(b)(1).

ⁱⁱ In addition, employees may accept free attendance at events at which they are speaking pursuant to 5 C.F.R. 2635.203(b)(8)(i).

ⁱⁱⁱ NASA employees who are attending the 41st Space Symposium pursuant to a registration fee NASA has paid for or through sponsored travel approval pursuant to 31 U.S.C. §1353 may attend any of the events hosted by the Space Foundation provided by those approvals.