National Aeronautics and Space Administration

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

April 28, 2026

Reply to Attn of: CC

TO: Distribution

FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance by NASA Employees at the U.S. Astronaut Hall of Fame Gala

The Astronaut Scholarship Foundation, a nonprofit organization under section 501(c)(3) of the Internal Revenue Code, will host the Space Heroes and Legends Award Banquet at the KSC Visitor Complex, Merritt Island, Florida, at 6 p.m. on May 16th, 2026. The event is celebrating the 2026 Hall of Fame Inductees.

The hosts have invited over 325 people to attend. Attendees will have a diversity of views or interests and will include corporate and industry executives and workers, teachers, space enthusiasts, government officials, NASA senior management, aerospace contractors, military leaders, tourism/community leaders, and NASA retirees. NASA invitees may bring one guest. The estimated cost of the event, including all food and beverages, is $450 per person. For those attending with a guest, the total estimated cost is $900. The Astronaut Scholarship Foundation is the primary organizer and Delaware North is a sponsor 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 Astronaut Scholarship Foundation or Delaware North, 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.

In addition, this is a fundraising event for The Astronaut Scholarship Foundation. NASA employees may not participate in the promotion, production, or presentation of the event, including serving as honorary chairperson, sitting at a head table during the event, and standing in a reception line.

Charles Vinson Digitally signed by Charles Vinson
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Alex Vinson
Agency Designee