



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

July 13, 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 University of Maryland Acres Farm Innovation Ambassador Team Reception on July 14, 2026

On July 14, 2026, the University of Maryland Geographical Sciences Department “Acres” program will host a Farm Innovation Ambassador Team Reception at the Hart Senate Office Building, 120 Constitution Ave NE, Washington, DC, from 5:00 p.m. to 8:00 p.m. The purpose of the event is to inform policymakers about Acres’ Farm Innovation Ambassador Team and the applications of Earth observation science to the United States (U.S.) agriculture. The University of Maryland is in control of the organizing, planning and invitations for this event, which is sponsored by John Deere & Co., National Sorghum Producers, and the USA Rice Federation.

Approximately 1,300 people have been invited to attend. Guests of NASA attendees are not invited. Attendees will have a diversity of views or interests and will include representatives of universities, agricultural stakeholders including commodities groups, and the U.S. legislative branch. The estimated value of the event, including all food and beverages, is \$45 per person.

The sponsors may provide small items such as stickers or food samples derived from U.S. agriculture products, all with a total retail value of less than \$10. NASA employees may accept 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.

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 sponsors 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. However, NASA employees who have a significant role in any pending matter affecting the interests of the University of Maryland, 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