

National Aeronautics and
Space Administration

John H. Glenn Research Center
Lewis Field
Cleveland, OH 44135-3191



October 8, 2024

Reply to Attn of: G

TO: NASA Civil Servant Employees

FROM: G/Chief Counsel, Deputy Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the
2024 Keystone Space Conference

On October 28-29, 2024, the Keystone Space Collaborative, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host the Keystone Space Conference at Omni William Penn Hotel, 530 William Penn Place, Pittsburgh, Pennsylvania 15219. The conference will consist of keynote speakers, plenary sessions, panel discussions, networking events, and a VIP event for conference speakers and prominent attendees. This event will bring together key stakeholders in space industry development, research and development, advocacy, and workforce innovation to pursue collaboration opportunities that will drive innovation and growth within the local space sector.

Approximately 300 people are expected to attend the conference. Attendees will have a diversity of views or interests and will include representatives from the commercial space industry, legislators, academia, and state and Federal agencies. The estimated cost of the conference, which includes food and beverages during the main presentations as well as two networking events, is approximately \$300 per person. In addition to the items presented to all attendees, certain NASA employees that are presenting on behalf of NASA at the conference have also been invited to a VIP event.¹ The estimated cost of this VIP event, including food and beverage, is \$25 per person. 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 this event because it will provide an opportunity for the invitees to develop a unified strategy for advancing the tri-state (Ohio, Pennsylvania, and West Virginia) region’s role in the national and global space landscape. NASA employees will have an opportunity to exchange ideas and views pertaining to NASA’s policies, programs, and operations.

¹ Clayton Turner, Acting Associate Administrator of NASA Space Technology Mission Directorate is scheduled to present on behalf of NASA on October 28, 2024. James Free, Associate Administrator of NASA, Dr. James Kenyon, Center Director of NASA Glenn Research Center, Dr. Makenzie Lystrup, Center Director of Goddard Space Flight Center, and Wes Deadrick, Director of NASA’s Independent Verification and Validation (IV&V) Program, are scheduled to present on behalf of NASA on October 29, 2024.

The NASA employees, including those employees in non-career positions who are required to sign the ethics pledge under Executive Order 13989, who do not have a significant role in a matter affecting the interests of the sponsor, may accept the invitation for free attendance to the event for themselves and a guest. In those circumstances, I find that the Agency's interest in attendance outweighs any concerns that the individual may be, or may appear to be, improperly influenced in the performance of his or her duties.

However, NASA employees who have a significant role in any pending matter affecting the interests of the sponsor, such as procurement duties, program management, or negotiating or administering a Space Act Agreement, should seek a separate determination from my office as to whether they may accept the invitation.

Callista M. Puchmeyer