



November 16, 2011

Mr. Don Fox
Acting Director and General Counsel
Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Re: RIN 3209-AA04
[Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations]

Dear Mr. Fox:

RIN 3209-AA04 unwisely seeks to revise regulations governing standards of ethical conduct for executive branch employees of the Federal Government by restricting their attendance at widely attended gatherings (WAGs).

The Association for Play Therapy (APT) is a national professional society that advances the play therapy modality used by literally thousands of licensed counselors, marriage & family therapists, psychologists, clinical social workers, and other mental health professionals to better communicate with and treat clients, particularly children.

APT takes exception to the OGE insinuation that associations "*may sponsor educational activities for their members and even the public, but the primary concern of such associations generally is not the education and development of members of a profession or discipline, which is the focus of the proposed exclusion*". This is stunningly inaccurate. As do literally thousands of other associations, APT annually endorses or approves education and training programs offered by university mental health departments and continuing education providers. These programs are intended to enhance the proficiency of mental health professionals and assist them when renewing their state licenses and play therapy credentials.

Further, it is essential that we not restrict such education, training, and informational opportunities to only our members. By making these programs accessible to the general public, including public officials, we promote public awareness and knowledge about critical mental health issues and cutting-edge research and the most effective treatments.

If the real intent of such OGE revisions is to curtail the political activities of nonprofit associations, then the IRS should more objectively and consistently scrutinize association activities during program and financial audits. By contrast, this proposed one-size-fits-all revision seriously curtails public dialogue and interaction between our public and private sectors.

Your favorable consideration of these comments is both critical and appreciated. Thank you!

Cordially,

A handwritten signature in black ink that reads "William M. Burns, CAE".

William M. Burns, CAE
President | CEO