

Good Afternoon:

The Nevada Independent Insurance Agents (NIIA) is a 501(c)3 trade association and fully supports the OGE mission to enact high ethical standards for executive branch employees. However, we do not support the exclusion of trade associations from the use of the “widely attended gathering” exception.

Educational and professional development programs conducted by trade associations are virtually indistinguishable from those conducted by the other types of organizations listed in the proposed rule. They offer the same benefits to government employees and should qualify for the same exclusion.

Specifically, NIIA administers the professional designation program for insurance professionals in Nevada and neighboring states. The Certified Insurance Counselor (CIC) and Certified Insurance Service Representative (CISR), as well as the Certified Risk Manager (CRM) and Certified School Risk Manager (CSRM), are among the nationally recognized designations for those in the insurance industry and related professions. I know there are Federal employees holding these designations in many areas of the federal government (risk managers, actuaries, etc.). The retention of their designations and continuing education in these important area would be negatively impacted by enacting the rules as currently proposed.

Thank you for any consideration you may give to our request to include trade associations in the “widely attended gathering” exception.

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