December 12, 2011

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

RE: RIN 3209-AA04
(Proposed Amendments Limiting Gifts from Registered Lobbyists and Lobbying Organizations)

Dear Mr. Fox,

The American Association of Service Coordinators (AASC) appreciates the opportunity to comment on proposed rule RIN 3209-AA04 that proposes to restrict all executive branch employees of the Federal Government from using certain exceptions to accept gifts from registered federal lobbyists and lobbying organization, including invitations to widely attended gatherings (WAGs). As President and Chief Executive Officer of AASC, I would like to voice our concern regarding the proposed provision regarding federal employees' attendance at WAGs.

The American Association of Service Coordinators (AASC) is a section 501(c)(6) individual membership organization of over 2700 social service workers and other affordable housing professionals. Its members assist over one million low-income seniors, individuals with special needs and families residing in affordable housing to gain self-sufficiency. Our members assist seniors in identifying, locating and acquiring the services necessary for them to remain self-reliant and age in place in their own apartments. They also provide assistance and access to community-based supports, skills training and resources for low-income families to achieve self-sufficiency and economic independence.

AASC supports the Office of Government Ethics' (OGE) mission to promote high ethical standards for executive branch employees but strongly disagrees with the supposition by OGE in the proposed rule that trade associations "may sponsor educational activities

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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 statement is fundamentally flawed, and wrongly excludes thousands of trade associations such as AASC that are, in fact, wholly dedicated to the professional betterment of their respective members. AASC's mission is to support our members that serve low-income families, seniors and persons with disabilities in public, subsidized and other affordable housing situations through leadership, education, training, professional standards, advocacy and other member services. AASC also serves its members by advocating for appropriate laws, adequate funding levels and responsible public policies that address the needs of the residents in these housing communities and promotes the highest standards of ethical behavior, service and accountability.

OGE's acknowledgement that certain WAGs can serve important government purposes and that federal employees should be able to accept offers of free attendance to "substantive events that would provide a legitimate educational or professional development benefit that furthers the interests of an agency." While this is an encouraging position, your proposed rule narrowly limits the types of organizations from which federal employees can accept such offers.

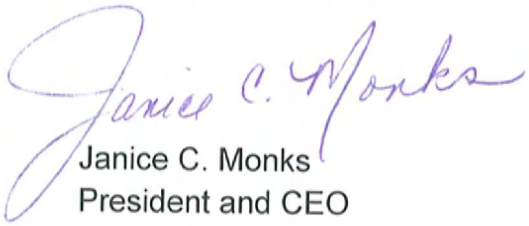
AASC conducts a yearly national conference that provides over 80 educational sessions to increase professional expertise, leadership and knowledge. In addition to this yearly event, AASC conducts a variety of web-based learning opportunities for its members and the public to increasd skills, enhance knowledge and promote ethical and knowledge-based practices. Federal agency employees have routinely attended our conferences as faculty of the educational sessions and even as keynote speakers at our general sessions. Federal agency employees have also served as faculty for our web-based training events.

Setting policies that restrict knowledge-sharing between the government and trade associations is counterproductive to the administration's aspirations for a partnership between the public and private sectors. We respectfully ask that the OGE reconsider what appears be a subjective, overly simplistic definition of the business of trade

associations, and conduct appropriate research that we believe would demonstrate that the OGE has erred in its interpretation.

Thank you for your consideration and if you have any questions, please contact Judith Chavis, executive vice president of public policy at AASC, at 614-848-5958, ext. 104 or jchavis@servicecoordinator.org.

Sincerely,



Janice C. Monks
President and CEO