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Public Comments on Standards of Ethical Conduct for Employees of the Executive Branch:  
Limiting Gifts from Registered Lobbyists and Lobbying Organizations:=====

Title: Standards of Ethical Conduct for Employees of the Executive Branch: Limiting Gifts from  
Registered Lobbyists and Lobbying Organizations

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The majority of the rule is well thought out. I especially like that fact that private for profit colleges are not exempt from the widely held gathering provisions. Many private for profit colleges lack regulation or even accreditation in giving out degrees that yield graduates no job prospects, while at the same time they knowingly deceive students. The one area of potential concern within the university interactions between government political appointees and faculty of a university is where a given professor or member of faculty could also be a consultant for a company or institution which could stand to benefit or gain undue access in the relational setting

of a university gathering or function. An instance of this could be were someone who used to work for the SEC is now a professor, and interacts with former employees at a university function could inadvertently lobby on behalf of a company that the faculty consults for.

A means that could potentially reduce and or clarify the intent of lobbyists sending invitations to political government employees about widely attended gatherings, could consists of all invitations going through some kind of clearing house of public record. What that could do is state the function, the intention of the function, why the appointee should be there, and any potential conflict of interest that might arise. A system of this sort could make it so that appointees could interact in a reasonable manner with clients, and still limits the amount of undue influence that could arise.

I would like some clarification in regards to section involving exemptions. On page 56336 in the top of the third paragraph I would like to know how the \$20 de minimis exception that the pledge is supposed to root out is still present in the language of the rule itself. Do government political employees get a \$20 de minimis or don't they?