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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 proposed rule would not allow government employees to

use the "widely attended gathering" exception to attend various programs and events held by lobbying organizations. The rules, however, carve out exceptions for educational and professional development activities held by Section 501(c)(3) organizations, institutions of higher education, and nonprofit

professional associations, scientific organizations and learned societies, without regard to the LDA registration status of these entities. Trade associations are not covered by the 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.

? There are thousands of examples of substantive educational programs, seminars, trade shows held by trade associations that would be valuable to government employees who attend.

? Policies that restrict interaction and knowledge-sharing between the government and trade associations are counterproductive to the administration's stated aspirations to work in partnership with the business community to create jobs and grow the economy. Why would the

administration want to isolate itself from the industries they are charged with regulating?

? While there is nothing in the proposed rule that says federal employees couldn't pay out-of-pocket registration fees to attend trade association programs, the unbalanced treatment of trade associations by OGE will discourage them from doing so. The problem with the rule is that it deems other types of association and nonprofit events to be appropriate, while implying that trade association programs have no value to government employees.