

# Indiana Association of United Ways



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

November 14, 2011

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

Dear Mr. Fox and reviewers:

Indiana Association of United Ways appreciates the opportunity to comment on proposed rule RIN 3209-AA04, which would restrict all executive branch employees of the Federal Government from using certain exceptions to accept gifts from registered federal lobbyists and lobbying organizations, including invitations to widely attended gatherings (“WAGs”).

The Indiana Association of United Ways (IaUW) represents 62 United Ways throughout Indiana. Together, Indiana’s United Ways invest in human services and meet critical needs of Hoosiers. As 501(c)(3) nonprofit organizations, IaUW and its members are not directly affected by the proposed rule. However, we are concerned about the possible chilling effect on collaborative relationships between federal agencies and certain organizations. In our collaborative initiatives, partners could be negatively affected by this rule, as some federal employees may avoid all events rather than distinguishing those that are allowable.

Indiana Association of United Ways fully supports OGE’s mission to promote high ethical standards for government, specifically to limit a sort of “pay-to-play” approach. We are encouraged in OGE’s acknowledgement that certain widely attended gatherings may serve important educational purposes, such as participation in meetings and conferences held by certain organizations. Government employees who administer programs and promulgate rules may benefit from attending programs where they can understand how services and their clients might be impacted by federal actions. At the same time, event attendees have the opportunity to learn more about federal agencies’ interests, priorities and processes.

We are also concerned that OGE’s exclusion of trade associations may have unintended consequences in limiting the participation of federal employees in their activities, which are often comparable to the professional development opportunities hosted by other nonprofit organizations named in the proposed rule. Trade associations are just one type of nonprofit organization.

We encourage you to continue efforts to strengthen government ethics. We respectfully ask you to consider possible unintended consequences or chilling effects on relationship-building between government and the mission-based charitable sector. Please let me know if I can provide any additional information or documentation. I may be reached at 317-921-1394 or [lucinda.nord@iauw.org](mailto:lucinda.nord@iauw.org).

Respectfully submitted,

/s/ Lucinda Nord  
Vice President, Public Policy