

**From:** Robert Hay, Jr.  
**To:** USOGE  
**Subject:** ASAE Comments on Proposed Amendments to Part 2635  
**Date:** Wednesday, October 26, 2011 8:47:38 AM  
**Attachments:** [Final ASAE Sign-On Comments to OGE with Alpha Signatures.pdf](#)

On behalf of ASAE and over 450 associations across the country, please find attached our comments and concerns with the proposed amendments to the regulations governing standards of ethical conduct for executive branch employees. If you have any questions about the comments, please contact ASAE at (202) 626-2703 or [publicpolicy@asaenet.org](mailto:publicpolicy@asaenet.org).

Thank you,  
Robert Hay

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Discover The Power of Associations at  
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October 5, 2011

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

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

Dear Mr. Fox:

ASAE is appreciative of the opportunity to comment on proposed rule RIN 3209-AA04, which restricts 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 American Society of Association Executives (“ASAE”) is a section 501(c)(6) individual membership organization of more than 22,000 association executives and industry partners representing nearly 12,000 tax-exempt organizations. Its members manage leading trade associations, professional societies, and voluntary organizations across the United States and in 50 countries around the globe. We advocate for associations so that they may continue to fulfill their important missions and improve the quality of life in the United States and abroad.

ASAE fully supports OGE’s mission to promote high ethical standards for executive branch employees, and is generally accepting of OGE’s intention to limit some of the exceptions that may have been used on occasion to permit certain gifts, such as invites to holiday parties or other social events, where the nexus to the government’s interest is attenuated.

ASAE is encouraged, further, by OGE’s acknowledgement that certain widely attended gatherings can serve important government purposes. OGE justly asserts in its proposed rule that federal employees, including political appointees, 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.”

In crafting that exception, OGE proposes to allow government employees to accept invitations to attend 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. In explaining the WAG exception, OGE correctly points to the valuable educational and professional development opportunities at these types of programs, but then inexplicably leaves trade associations out of the limited exclusion.

OGE contends in its proposed rule that trade associations “may sponsor educational activities 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 narrow reading of trade association activities based on a definition from Encyclopedia Britannica ignores the important role these organizations play in virtually every industry that the government seeks to regulate. Companies join trade associations to promote common interests, share best practices and learn about the latest developments in their industry. While many trade associations engage in advocacy, they also help resolve industry-wide issues that could otherwise threaten economic growth, and set safety and technical standards that benefit everyone in exactly the same way as professional associations, scientific organizations and learned societies.

A considerable intersection exists between government and trade associations’ interests. Today’s mixed economy – where government and business both play important roles with regard to production, consumption, job creation, and investment – requires mutual understanding and a free exchange of ideas, knowledge and expertise to ensure informed policymaking and economic progress.

Lawrence Summers, former director of the White House National Economic Council, said last year, “Business and government have important mutual obligations. Government must recognize the importance of building the foundations for businesses to succeed and ensuring a stable business environment. Likewise, businesses must carefully consider their obligations to their fellow citizens.”

In an address earlier this year to the U.S. Chamber of Commerce, President Obama said he envisioned a partnership between the public and private sectors that he called “Winning the Future,” promising to lay the foundation for businesses to grow and innovate and asking businesses to invest in America.

Setting policies that restrict knowledge-sharing between the government and trade associations is counterproductive to the administration’s stated aspirations to work in partnership with the business community to create jobs and grow the economy.

Trade associations are among the many types of nonprofit organizations that sponsor programs in consonance with government interests and with Federal employees’ professional development aspirations. They regularly hold seminars, conferences, trade shows and other programs that forecast industry performance and spotlight concerns. Government employees tasked with promulgating regulations most assuredly benefit from attending programs where they can learn about latest developments, see new product demonstrations, and understand how industries might be impacted by rulemaking. At the same time, trade association members have the opportunity to learn more about agencies’ interests and processes and are better prepared to comply with federal regulations.

These 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.

While ASAE appreciates OGE's stipulation that government employees can accept free attendance at events where they are speaking or presenting information on behalf of the administration, the unbalanced treatment of trade association programs in the proposed rulemaking will likely discourage federal employees from availing themselves of these opportunities. Further, the implication in the proposed rule that trade associations use invitations to events as a means of cultivating access by registered lobbyists makes it unlikely federal employees would pay out-of-pocket to attend these types of programs and events, even if they would benefit from attending.

Another unintended consequence of this proposed rulemaking could be that it causes trade associations to deregister as lobbyists so as not to fall under the restriction on gifts such as widely attended gatherings. This would undermine the administration's stated interest in transparency, which we share.

There are countless examples of legitimate, substantive trade association programming that intersect with the government's interests. Trade associations exist for every industry that the federal government regulates, from food safety and insurance to energy and telecommunications, just to name a few. These organizations and the industries they represent want to work with the administration to grow the economy, reduce unemployment, and protect America's standing and credibility in the world. In order to work together, we need the administration to recognize associations as something more than lobbying groups working to exert undue influence over federal agencies and their employees.

ASAE and the attached list of associations urge OGE to revise its proposed exception for gifts to allow federal employees to attend substantive educational programs and events held by trade associations, for the same reasons that this exception has been extended to the other types of organizations listed in the proposed rule.

Thank you in advance for your consideration and if you have any questions, please contact Jim Clarke, senior vice president of public policy at ASAE, at 202-626-2865 or [jclarke@asaenet.org](mailto:jclarke@asaenet.org).



Sincerely,

John H. Graham IV, CAE President and  
CEO

Association Names Listed Alphabetically

AAEI: American Association of Importers  
and Exporters Washington, DC

AALAS: American Association for  
Laboratory Animal Science Memphis, TN  
AASP-PA Harrisburg, PA

Academy of General  
Dentistry Chicago, IL

AdvaMed – Advanced Medical  
Technology Association Washington,  
DC

Aerospace Industries Association of America, Inc. Arlington, VA

AGC of Saint Louis St. Louis, MO

Agriculture Retailers Association Washington, DC

Air Conditioning Contractors of America Arlington, VA

Air-Conditioning, Heating, and Refrigeration Institute Arlington, VA

Airport Council International – North America Washington, DC

Alabama Association of Realtors Montgomery, AL

Alliance for Women in Media McLean, VA

Alliance of Automotive Service Providers of Pennsylvania Harrisburg, PA

AMC: Association Management Center Glenview, IL

America Outdoors Association Knoxville, TN

American Academy of Audiology Reston, VA

American Academy of Neurology St. Paul, MN

American Academy of Periodontology Foundation Chicago, IL  
American Academy of Physician Assistants Alexandria, VA

American Architectural Manufacturers Association Schaumburg, IL

American Association for the Study of Liver Diseases Alexandria, VA

American Association of Birth Centers Perkiomenville, PA

American Association of Cosmetology Schools Scottsdale, AZ

American Association of Neurological Surgeons Rolling Meadows, IL

American Association of Neuromuscular & Electrodiagnostic Medicine (AANEM) Rochester, MN

American Association of State Colleges and Universities Washington, DC

American Astronomical Society Washington, DC

American Bakers Association Washington, DC

American Beverage Association Washington, DC

American Bus Association Indianapolis, IN

American Business Media New York, NY

American Chemistry Council Washington, DC

American Cleaning Institute Washington, DC

American Frozen Food Institute  
American College of Clinical Pharmacy  
(ACCP) Lenexa, KS

American College of Emergency  
Physicians Washington, DC

American College of  
Radiology Reston, VA

American College of  
Rheumatology Atlanta, GA

American Composites Manufacturers  
Association Arlington, VA

American Council of Engineering  
Companies Washington, DC

American Council of Engineering  
Companies of Kansas Topeka, KS

American Council of Engineering  
Companies of Tennessee Nashville, TN

American Council of Engineering  
Companies of Virginia Richmond, VA

American Council of Independent  
Laboratories Washington, DC

American Council on International  
Personnel Washington, DC

American Counseling  
Association Alexandria, VA

American Dietetic  
Association Chicago, IL

American Fence  
Association Glen Ellyn, IL  
McLean, VA

American Gastroenterological  
Association Bethesda, MD

American Health Care  
Association Washington, DC

American Health Information Management  
Association Chicago, IL

American Immigration Lawyers  
Association Washington, DC

American Institute for International  
Steel Falls Church, VA

The American Hotel & Lodging  
Association Washington, DC

American Industrial Hygiene  
Association Fairfax, VA

American Lighting  
Association Dallas, TX

American Malting Barley  
Association Milwaukee, WI

American Moving & Storage  
Association Alexandria, VA

American Network of Community Options  
and Resource Alexandria, VA

American Nursery & Landscaping  
Association Washington, DC

American Nurses  
Association Silver Spring,  
MD

American Osteopathic  
Association Chicago, IL

American Public Power Association Washington, DC	DC APMI International Princeton, NJ
American Public Transportation Association Washington, DC	Appraisal Institute Chicago, IL
American Road & Transportation Builders Association Washington, DC	Arkansas Timber Producers Association Little Rock, AR
American Seed Trade Association Alexandria, VA	Associated Equipment Distributors Oak Brook, IL
American Society for Reproductive Medicine Birmingham, AL	Associated General Contractors Arlington, VA
American Society of Travel Agents Alexandria, VA	Associated General Contractors of the Quad Cities Rock Island, IL
American Speech-Language-Hearing Association (ASHA) Rockville, MD	Associated Wire Rope Fabricators Tulsa, OK
American Staffing Association Alexandria, VA	The Association Advantage LLC Wakefield, MA
American Supply Association Chicago, IL	Association Executives of North Carolina Raleigh, NC
American Traffic Safety Services Association Fredericksburg, VA	Association for Metallically Stabilized Earth McLean, VA
American Veterinary Medical Association Schaumburg, IL	Association for Play Therapy Clovis, CA
American Wood Council Leesburg, VA	Association Forum of Chicagoland Chicago, IL
America's Blood Centers Washington, DC	Association Management Group McLean, VA
Angel Capital Association Overland Park, KS	Association Management Services Pasadena, CA
Animal Health Institute Washington,	Association of Cable



Communicators Washington, DC

Association of Community College  
Trustees Washington, DC

Association of Corporate Counsel Washington, DC

Association of Defense Communities Washington, DC

Association of Directory Publishers Traverse City, MI

Association of Food Industries Neptune, NJ

Association of Global Automakers Washington, DC

Association of Home Appliance Manufacturers Washington, DC

Association of Marina Industries Warren, RI

Association of Rotational Molders Glen Ellyn, IL

Association Services of Michigan Lansing, MI

Automotive Aftermarket Industry Association Bethesda, MD

Bearing Specialists Association Glen Ellyn, IL

Biotechnology Industry Organization Washington, DC

Bobrow and Associates Citrus Heights, CA

Brick Industry Association Reston, VA

Building Owners and Managers Association (BOMA) International Washington, DC CAHSAH: The California

Association for Health Services at Home Sacramento, CA

California, Nevada, Arizona Automotive Wholesalers Association Rancho Cordova, CA

Carolina/Virginia Dairy Products Association Morrisville, NC

Carolinas AGC Charlotte, NC

CASS – An International Separation Science Society Emeryville, CA

CCIM Institute Chicago, IL

Ceramic Tile Distributors Association Glen Ellyn, IL

CMAA: Construction Management Association of America McLean, VA

CMP Management, Inc. Austin, TX

Coalition for Health Funding Washington, DC

Coalition for Health Services Research Washington, DC

College and University Professional Association for Human Resources Knoxville, TN

ComNet Marketing Group Medford, OR

Compressed Gas Association Chantilly, VA

COMPTEL: The  
Competitive  
Communications  
Association Washington,  
DC

Concrete Reinforcing Steel  
Institute Schaumburg, IL

Construction Industry Round  
Table McLean, VA

The Consumer Electronics  
Association Arlington, VA

Consumer Healthcare Products  
Association Washington, DC

Consumer Specialty Products  
Association Washington, DC

Convention Industry  
Council Alexandria, VA

Cook-Witter, Inc.  
Springfield, IL

Council for Advancement & Support of  
Education (CASE) Washington, DC

Council for Affordable and Rural  
Housing Alexandria, VA

Council for Responsible  
Nutrition Washington, DC

Credit Union National  
Association Washington, DC

CropLife America  
Washington, DC

Delta Sigma Phi  
Fraternity Indianapolis, IN

Direct Marketing  
Association Washington,  
DC

Door and Hardware  
Institute Chantilly, VA

EastPay,

Inc.  
Richmond,  
VA

Edison Electric  
Institute Washington,  
DC

Effective Database  
Management Hamilton, VA

Electronics Representatives Association,  
Southern California Chapter Irvine, CA

Emergency Department Practice  
Management Association McLean, VA

Empire State Society of Association  
Executives, Inc. East Greenbush, NY

The Engineering Society of  
Detroit Southfield, MI

EPCOR  
Kansas City,  
MO

ESA, Electronic Security  
Association Irving, TX

The ESOP  
Association  
Washington, DC

Exit Planning  
Institute Algonquin,  
IL

Experience  
Columbus  
Columbus, OH

The Fertilizer  
Institute  
Washington, DC

Florida Assisted Living

Association Tallahassee, FL

Florida Chiropractic  
Association Oakland, FL

Florida Fruit and Vegetable  
Association Maitland, FL

Florida Police Chiefs  
Association Tallahassee, FL

Forest Resources  
Association Rockville, MD

General Aviation Manufacturers  
Association (GAMA) Washington, DC

Georgia Association of Water  
Professionals Marietta, GA

Georgia Chiropractic  
Association Tucker, GA

Georgia Society of Association  
Executives Atlanta, GA

The Georgia Society of  
CPAs Atlanta, GA

Golf Course Superintendents  
Association of America Lawrence, KS

Greater Atlanta Homebuilders  
Association Atlanta, GA

Greater Houston Homebuilders  
Association Houston, TX

The Guild  
Association Malden,  
MA

The Harrington  
Company Minneapolis,  
MN

Healthcare Distribution Management  
Association Arlington, VA Hearing

Industries Association Washington, DC

Hearth, Patio & Barbecue  
Association Arlington, VA

Hollywood Post  
Alliance Los Angeles,  
CA

Home Builders Association of South  
Carolina Columbia, SC

Home Ports,  
Inc.  
Chestertown,  
MD

The Hosiery  
Association Charlotte,  
NC

Houston Apartment  
Association Houston, TX

IAEE: International Association of  
Exhibitions and Events Dallas, TX

ICPI, Interlocking Concrete Pavement  
Institute Herndon, VA

IANM: Independent Insurance Agents of  
New Mexico Albuquerque, NM

Illinois Academy of Family  
Physicians Lisle, IL

Illinois Retail Merchants  
Association Chicago, IL

Illinois Society of Association  
Executives Springfield, IL

Illuminating Engineering  
Society New York, NY

IMI Association

Executives Morrisville,  
NC Independent  
Community Bankers of  
America Washington,  
DC

Independent Insurance Agents & Brokers of New York Syracuse, NY

Independent Office Products and Furniture Dealers Association Alexandria, VA

Independent Pool and Spa Service Association Granada Hills, CA

Indiana Bankers Association Indianapolis, IN

Indiana Funeral Directors Association Indianapolis, IN

Indiana Society of Association Executives Indianapolis, IN

Industrial Minerals Association – North America Washington, DC

Industrial Supply Association Philadelphia, PA

InfoComm International Fairfax, VA

Infusion Nurses Society Norwood, MA

Installation Quality Certification Program Erie, PA

Institute of Food Technologists Chicago, IL

Institute of Makers of Explosives Washington, DC

Institute of Real Estate Management Chicago, IL  
Institute of Scrap Recycling Industries, Inc. (ISRI) Washington, DC

International Academy of Compounding Pharmacists Alexandria, VA

International Association of Amusement Parks and Attractions Alexandria, VA

International Association of Assessing Officers Kansas City, MO

International Association of Diecutting and Diemaking Crystal Lake, IL

International Association of Lighting Designers Chicago, IL

International Association of Plumbing and Mechanical Officials (IAPMO) Ontario, CA

International Biometrics & Identification Association Washington, DC

International Cooperative and Mutual Insurance Federation/ Regional Association for the Americas McLean, VA

International Freight Forwarders & Custom Brokers Association of New Orleans Metairie, LA

International Institute of Synthetic Rubber Producers, Inc. Houston, TX

International Liquid Terminals Association Arlington, VA

International Sign Association Alexandria, VA  
International Trademark Association (INTA) New York, NY



International Wood Products  
Association Alexandria, VA

Iowa Telecommunications  
Association Urbandale, IA

IPC Association Connecting Electronics  
Industries Bannockburn, IL

Irrigation  
Association Falls  
Church, VA

Joint Commission on Allied Health  
Personnel in Ophthalmology St. Paul,  
MN

Juvenile Products Manufacturers  
Association Mount Laurel, NJ

Kansas Livestock  
Association Topeka,  
KS

Kansas Organization of  
Recyclers Topeka, KS

Kansas Pest Control  
Association Topeka, KS

Kansas Society of Association  
Executives Topeka, KS

King County (Seattle) Bar  
Association Seattle, WA

Kitchen Cabinet Manufacturers  
Association Reston, VA

LarsonAllen  
LLP  
Arlington,  
VA

Laser Institute of  
America, Inc. Orlando, FL

Louisiana Association of Criminal Defense  
Lawyers Baton Rouge, LA

Louisiana Dental  
Association Baton Rouge,  
LA

Louisiana Gas  
Association Baton  
Rouge, LA

Louisiana Industry for Film and  
Entertainment Baton Rouge, LA

Louisiana Society of Association  
Executives Baton Rouge, LA

The M  
Companies  
Arlington, VA

Maine Association of Broadcasters,  
Inc. Augusta, ME

Manatee Chamber of  
Commerce Bradenton, FL

Manufacturer and Business  
Association Erie, PA

Marble Institute of  
America Cleveland, OH

Media Financial Management  
Association Northfield, IL

Medical Device Manufacturers  
Association Washington, DC

Medical Oncology Association of Southern  
California, Inc. Upland, CA

Metal Construction  
Association Washington, DC

Metal Powder Industries

Federation Princeton, NJ

Metals Service Center  
Institute Rolling Meadows, IL

Military Officers' Association of  
America Alexandria, VA

Montana Health Care  
Association Helena, MT

Montana Society of Association  
Executives Helena, MT

Montana Telecommunications  
Association Helena, MT

Mortgage Bankers  
Association Washington,  
DC

Motor & Equipment Manufacturers  
Association Research Triangle, NC

Motorcycle Industry  
Council Irvine, CA

Motorcycle Safety  
Foundation Irvine, CA

MPA – The Association of Magazine  
Media New York, NY

NACHA – The Electronic Payments  
Association Herndon, VA

NAMA: National Automatic Merchandising  
Association Chicago, IL

NAMI (National Alliance on Mental  
Illness) Arlington, VA

National Affordable Housing Management  
Association Alexandria, VA

National Agricultural Aviation  
Association Washington, DC

National Alliance of State Pharmacy

Associations Richmond, VA

National Asphalt Pavement  
Association Lanham, MD

National Association for Surface  
Finishing Washington, DC

National Association of Affordable  
Housing Lenders Washington, DC

National Association of Architectural  
Metal Manufacturers Glen Ellyn, IL

National Association of  
Broadcasters Washington, DC

National Association of Chain Drug  
Stores Alexandria, VA

National Association of Chemical  
Distributors (NACD) Arlington, VA

National Association of Children's  
Hospitals Alexandria, VA

National Association of Clean Water  
Agencies (NACWA) Washington, DC

National Association of College  
Stores Oberlin, OH

National Association of County  
Behavioral Health and Development  
Disability Directors Washington, DC

National Association of Court  
Reporters Vienna, VA

National Association of Development  
Companies McLean, VA National  
Association of Enrolled Agents  
Washington, DC

National Association of Home  
Builders Washington, DC

National Association of Insurance and  
Financial Advisors Falls Church, VA

National Association of Insurance and  
Financial Advisors – Louisiana Baton  
Rouge, LA

National Association of  
Manufacturers Washington, DC

National Association of Professional  
Background Screeners Morrisville, NC

National Association of Professional  
Insurance Agents Alexandria, VA

National Association of  
Realtors® Washington, DC

National Association of School  
Psychologists Bethesda, MD

National Association of Surety Bond  
Producers Washington, DC

National Association of Trailer  
Manufacturers Topeka, KS

National Association of Water  
Companies Washington, DC

National Association of Wheat  
Growers Washington, DC

National Automobile Dealers  
Association McLean, VA National  
Cable and Telecommunications  
Association Washington, DC

National Center for Assisted  
Living Washington, DC

National Christmas Tree

Association Chesterfield, MO

National Church Goods  
Association Glen Ellyn, IL

National Coalition of Estheticians,  
Manufacturers/Distributors &  
Associations Ridgewood, NJ

National Corn Growers  
Association Washington, DC

National Cooperative Business  
Association Washington, DC

National Council of Agricultural  
Employees Vienna, VA

National Council of Youth Sports  
(NCYS) Stuart, Florida

National Customs Brokers and  
Forwarders Association of America, Inc.  
Washington, DC

National Electrical Contractors  
Association Bethesda, MD

National Electrical Manufacturers  
Association Arlington, VA

National Funeral Directors  
Association Brookfield, WI

National Ground Water  
Association Westerville, OH

National Independent Automobile Dealers  
Association Arlington, TX National  
Industries for the Blind Alexandria, VA

National Leased Housing  
Association Washington, DC

NATSO, Representing America's Travel  
Plazas and Truckstops Alexandria, VA

National Marine Manufacturers  
Association Chicago, IL

Nebraska Bankers  
Association Lincoln, NE

National Milk Producers  
Federation Arlington, VA

Nebraska REALTORS  
Association Lincoln, NE

National Office Products  
Alliance Alexandria, VA

Nevada Society of Association  
Executives Las Vegas, NV

National Poultry & Food Distributors  
Association St. Marys, GA

New Hampshire Dental  
Society Concord, NH

National Public Employer Labor Relations  
Association Oceanside, CA

New Jersey Association of Mental Health  
and Addiction Agencies, Inc. Mercerville,  
NJ

National Ready Mixed Concrete  
Association Silver Spring, MD

New Jersey Hospice and Palliative Care  
Organization Scotch Plains, NJ

National Roofing Contractors  
Association Rosemont, IL

New Jersey Landscape Contractors  
Association Elmwood Park, NJ

National Rural Electric Cooperative  
Association Arlington, VA

New York Association of Convenience  
Stores Albany, NY

National RV Dealers  
Association Fairfax, VA

New York State Motor Truck  
Association Albany, NY

National School Supply & Equipment  
Association Silver Spring, MD

NJAFED – NJ Association of Fire  
Equipment Distributors South Plainfield,  
NJ

National Shooting Sports  
Foundation Newtown, CT

National Society of Professional  
Engineers Alexandria, VA

Non-Profit  
Help  
Alexandria,  
VA Nuclear  
Energy

National Sporting Goods  
Association Mount Prospect, IL  
National Student Nurses'  
Association Brooklyn, NY

Institute  
Washington,  
DC

National Truck Equipment  
Association Farmington Hills, MI

NYBFAA – NY Burglar & Fire Alarm  
Association Albany, NY

OFA – The Association for Horticulture  
Professionals Columbus, OH

Office Furniture Dealers  
Association Alexandria, VA

Ohio Council for Home Care and  
Hospice Columbus, OH

Ohio Osteopathic  
Association Columbus, OH

Ohio Podiatric Medical  
Association Columbus, OH

Ohio Provider Resource  
Association Columbus, OH

Ohio Society of Association  
Executives Columbus, OH

Ohio Society of Certified Public  
Accountants Columbus, OH

Ohio State Medical  
Association Hilliard, OH

Oklahoma Association of  
Realtors Oklahoma City, OK

Oregon Society of Association Management  
(OSAM) Portland, OR

Pacific-West Fastener  
Association Los Alamitos, CA

PAFED – PA Association of Fire Equipment  
Distributors Erie, PA PBFAA –  
Pennsylvania Burglar & Fire Alarm  
Association Erie, PA

Pellet Fuels  
Institute  
Arlington, VA

Pennsylvania Bankers  
Association Harrisburg, PA

Petroleum Marketers Association of  
America Arlington, VA

PGA of America Palm Beach Gardens, FL

Pharmaceutical Research and  
Manufacturers of America Washington,  
DC

Plastic Pipe and Fittings  
Association Glen Ellyn, IL

Plumbing-Heating-Cooling Contractors –  
National Association McLean, VA

Plumbing Manufacturers  
International Rolling Meadows, IL

Portland Cement  
Association Skokie, IL

Post-Tensioning  
Institute Farmington  
Hills, MI

Precast/Prestressed Concrete  
Institute Chicago, IL

Precision Metalforming  
Association Independence,  
OH

Pressure Sensitive Tape  
Council Naperville, IL

Pressure Vessel Manufacturers  
Association Glen Ellyn, IL

Professional Association of Innkeepers  
International Haddon Heights, NJ

Professional Landcare  
Network Herndon, VA

Professional Land Surveyors of  
Oregon Salem, OR

Professional Services  
Council Arlington, VA

Project Health, The Indianapolis Medical  
Society Indianapolis, IN

Promotional Products Association  
International Irving, TX

Railway Engineering-Maintenance  
Suppliers Association Washington, DC

Recreational Off-Highway Vehicle  
Association Irvine, CA

RISE (Responsible Industry for a Sound  
Environment) Washington, DC

Safety Net Hospitals for Pharmaceutical  
Access Washington, DC

San Antonio Society of Association  
Executives San Antonio, TX

San Francisco Travel  
Association San Francisco,  
CA

Security Industry Association  
(SIA) Alexandria, VA

Sheet Metal and Air Conditioning  
Contractors' National Association  
(SMACNA) Chantilly, VA

The Sherwood  
Group Deerfield, IL

Small Business Legislative  
Council Washington, DC

Snow & Ice Management Association,  
Inc. Milwaukee, WI

Society for  
Neuroscience  
Washington, DC

Society of American  
Florists Alexandria, VA

Society of Government Meeting  
Professionals Alexandria, VA

The Software Defined Radio Forum,  
Inc. Phoenix, AZ

Soroptimist International of the  
Americas Philadelphia, PA

Southeastern Affordable Housing  
Management Association Atlanta, GA

Southern Association of Independent  
Schools Alpharetta, GA

Southern Crop Production  
Association Dawson, GA

Southern Illinois Builders Association, a  
chapter of the Associated General  
Contractors of America O'Fallon, IL

Southwestern Automated Clearing House  
Association Dallas, TX

Special Libraries  
Association Alexandria,  
VA

Specialized Carriers & Rigging  
Association Washington, DC Specialty  
Equipment Market Association  
Diamond Bar, CA

Specialty Vehicle Institute of America  
Irvine, CA

Thermoset Resin Formulators  
Association Glen Ellyn, IL

Sporting Goods Manufacturers of America  
Silver Spring, MD

Third Season Consulting,  
LLC Deerfield, IL

St. Louis Council of Construction  
Consumers Manchester, MO

Turfgrass Producers  
International East Dundee, IL

Student & Youth Travel Association  
McLean, VA

United Fresh Produce  
Association Washington, DC

Tate & Tryon, CPAs and  
Consultants Washington, DC

United Motorcoach  
Association Alexandria, VA

TechAmerica  
Washington, DC

United States Lactation Consultant  
Association Morrisville, NC

Tecker International LLC  
Clifton, VA

United States Telecom  
Association Washington, DC

Telecommunications Industry Association  
Arlington, VA

United Suburban Schools  
Association Oklahoma City, OK

Tennessee Medical Association  
Nashville, TN

Chamber of Commerce Washington,  
DC

Tennessee Road Builders  
Association Nashville, TN

Clean Heat & Power Association  
Falls Church, VA

Texas and Southwestern Cattle Raisers  
Association Fort Worth, TX

Grains Council Washington, DC

Texas Apartment Association  
Austin, TX

Travel Association Washington, DC

Vehicle Protection  
Association Selbyville, DE

Texas Association for Home Care &  
Hospice Austin, TX

Vinyl Siding  
Institute

Texas Credit Union League  
Dallas, TX

Washington, DC

Texas Poultry Federation  
Round Rock, TX

Virginia Association of Chiefs of  
Police Richmond, VA

Texas Society of  
CPAs Dallas, TX



Virginia Nurses  
Association Richmond,  
VA

CPAs Glen Allen, VA

Virginia Trucking  
Association Richmond, VA

Virginia Society of Association  
Executives Glen Allen, VA

Wanner  
Associates  
Harrisburg, PA

Virginia Society of

Washington Area New Automobile Dealers Association Washington, DC

Washington Metropolitan Area Corporate Counsel Association (WMAACCA)  
Washington, DC

Wilmington Regional Association of REALTORS, Inc. Wilmington, NC

World Pet Association, Inc. Monrovia, CA

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