

From: Kerri Wade [<mailto:kwade@awhonn.org>]
Sent: Monday, November 14, 2011 9:13 AM
To: USOGE
Subject: Proposed Amendments to Part 2635

November 14, 2011

Richard M. Thomas, Associate General Counsel
Office of Government Ethics (OGE)
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3917

Re: Regulation Identifier Number, 3209-AA04

Dear Mr. Thomas:

On behalf of the 24,000 members of the Association of Women's Health, Obstetric and Neonatal Nurses (AWHONN), I am writing in response to the September 13, 2011, proposed rule that extends the lobbyist gift ban to all executive branch employees. The proposed rule restricts government employees from using the "widely attended gathering" exception to participate in programs and events held by lobbying organizations. I appreciate the opportunity to provide comment.

AWHONN is a 501(c)3 nonprofit membership organization dedicated to the health of women and newborns. Our members are staff nurses, nurse practitioners, nursing school faculty, certified nurse-midwives, and nurse executives who work in hospitals, independent practices, universities, and community clinics throughout the United States. AWHONN has one registered lobbyist on its 46 person staff.

Each year, AWHONN hosts a national convention that draws an estimated 3,000 nurses and other health care industry leaders to share knowledge and advance nursing practice. Federal government employees, including members of the military, participate in AWHONN's convention as speakers, attendees, exhibitors and sponsors. Their contributions are valuable to the success of the convention, and ultimately, the work that nurses do in caring for women and newborns. As such, AWHONN urges you to maintain the exception in the proposed rule for 501(c)3 organizations.

Thank you for your consideration and if you have any questions, please contact Kerri Wade, Director of Government and Media Affairs at 202.261.2427 or kwade@awhonn.org.

Sincerely,

Karen Peddicord, PhD, RN
Chief Executive Officer