June 22, 2011

Richard M. Thomas
Associate General Counsel
Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, DC 20005–3917

RE: RIN 3209–AA09
Proposed Rule Exemption and Amendment Under 18 U.S.C. 208(b)(2)

Dear Mr. Thomas,

The American Physiological Society (APS) appreciates the opportunity to comment on the proposed rule concerning Government Employees Serving in Official Capacity in Nonprofit Organizations. The APS is a non-profit professional society, numbering 10,000 members, dedicated to fostering research and education as well as the dissemination of scientific knowledge concerning how the organs and systems of the body function. More than 200 of our members are employed by the government and are therefore subject to the rules governing official participation in nonprofit organizations.

Professional scientific societies offer important benefits for researchers by providing opportunities to exchange ideas through meetings and publications, recognizing outstanding scientific research activity and educating the next generation of scientists. Restricting the participation of government employees in the activities of professional scientific societies not only hinders the professional development of the federal employee but is also a loss to the wider scientific community.

Consequently, the APS supports the proposed rule exemption that would remove barriers to federal employees’ official participation in nonprofit organizations. Scientists in both the public and private sectors have a responsibility to maintain the public trust. By acting in good faith and in accordance with conflict of interest rules set by each federal agency, government employees should be able to participate in the full range of professional activities.

Sincerely,

[Signature]
Joey P. Granger
President
American Physiological Society