



American Society for Nutrition
Excellence in Nutrition Research and Practice

July 5, 2011

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

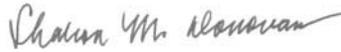
To The Office of Government Ethics:

The American Society for Nutrition (ASN) appreciates the opportunity to submit comments to the Office of Government Ethics (OGE) regarding participation of Government employees in an official capacity with nonprofit organizations. ASN is the professional scientific society dedicated to bringing together the world's top researchers, clinical nutritionists and industry to advance our knowledge and application of nutrition. ASN has over 4,300 members in the United States and around the world, working throughout government, academia, and industry, to conduct research that helps all Americans to live longer, healthier and more productive lives.

ASN strongly supports OGE's decision to allow Government employees to serve in an official capacity for nonprofit organizations, such as ASN, and permit them to participate in particular matters affecting the financial interests of the respective nonprofit organizations they serve for. Government employees account for nearly ten percent of ASN membership and have made substantive contributions to the development of ASN programs through involvement in research interest sections, councils, committees, etc. ASN has also had the privilege of having Special Experts and consultants to the Government serve in official positions such as on its Board of Directors and as elected officials of the society previously, and has benefited greatly from their involvement and oversight without any conflict. Government employees are some of the most dedicated ASN members, but by not being allowed to serve in official capacities they often have felt left out of the society's decision-making process. ASN welcomes the opportunity to have Government employees more involved and able to participate on its Board of Directors, as elected officials of the society, and in other official capacities such as on the Finance and Audit Committee.

Thank you for the opportunity to submit comments to the Office of Government Ethics in support of Government employees being allowed to serve in an official capacity with nonprofit organizations. Please contact Sarah Ohlhorst, M.S., R.D., Director of Government Relations, if ASN may provide further assistance. She can be reached at 301.634.7281 or sohlhorst@nutrition.org.

Sincerely,


Sharon M. Donovan, Ph.D., R.D.
President, American Society for Nutrition