

Walter M. Shaub, Jr.  
Director  
U.S. Office of Government Ethics  
1201 New York Avenue, NW.  
Suite 500  
Washington, DC 20005

Dear Mr. Shaub,

For a number of years, a number of scientific organizations, including those listed below, have worked with the Office of Government Ethics, the White House Office of Science and Technology Policy, and the Office of Personnel Management to bring about a policy change that would facilitate President Obama's 2010 call for policies to "allow full participation in professional or scholarly societies, committees, task forces and other specialized bodies of professional societies, including removing barriers for serving as officers or on governing boards of such societies" by exercising its authority under 18 U.S.C. 208(b)(2) to exempt the imputed financial interests of nonprofit organizations in which employees serve as officers, directors or trustees in their official capacity.

The proposed rule, published by OGE in July 2011, represented an important step towards that goal and we were eager to see the publication of the final rule. Although the public submissions are not posted on regulations.gov, to the best of our knowledge, the rule had substantial support. Thirty two professional societies – several of them consortia representing between 3 to 160 professional societies - signed a letter of strong support and many of these organizations also submitted individual comments.

We were recently advised by the Office of Science and Technology Policy that they met at the end of the year with representatives of your office and with officials from the White House Office of Management and Budget to discuss the final language that will be published after re-reviewing the comments. This was very welcome news, as we have continued to look forward to seeing the publication of the final rule.

Please accept our congratulations on your appointment as director of the Office of Government Ethics and our thanks for your attention to our concerns.

Sincerely,

Ellen Paul  
Executive Director  
Ornithological Council

Joined by:

American Association for the Advancement of Science  
American Educational Research Association American Meteorological Society  
American Fisheries Society

American Society of Agronomy  
American Sociological Association  
American Statistical Association  
Crop Science Society of America  
Materials Research Society  
River Management  
Soil Science Society of America  
The Wildlife Society