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GENERAL PROCEDURAL POLICIES

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**INTERCOMMUNICATION BETWEEN CVM  
AND OFFICE OF THE CHIEF COUNSEL**

1. **Purpose:**

The purpose of this guide is to define the Center policy concerning direct communication with Office of Chief Counsel (OCC) by CVM staff members.

2. **Policy:**

Requests for legal opinions, interpretation or guidance from the OCC pertaining to active regulatory actions, administrative actions, application or petition approvals, or other legal requests may be initiated by the Center staff members directly to the OCC when such requests are not expected to establish, rescind or significantly modify existing Center policies and procedures.

3. **Procedures:**

First line managers shall exercise discretion in initiating such requests by their staffs. Staff members are also expected to use discretionary freedom in conferring with OCC regarding ongoing actions that OCC may have under review.

- a. When requests for legal opinions, interpretation, or guidance initiated by Center staff members may result in the establishment of new policies or procedures, in rescinding or significantly modifying existing ones, the requests shall be formally routed through the Office Directors.
- b. Since the OCC does not function in a policy-making role, requests for opinions, interpretation or guidance shall pertain to legal considerations and not to policy guidance.
- c. The Center Director may issue more specific instructions within the context of this general policy and procedure guideline for the Center.