



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

November 6, 2002

DO-02-026

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Marilyn L. Glynn  
General Counsel

SUBJECT: Annual Update of 18 U.S.C. § 207(c) Component Designations

The Director of the Office of Government Ethics (OGE) is authorized by 18 U.S.C. §§ 207(h) to designate separate departmental and agency components for purposes of 18 U.S.C. § 207(c), the one-year post-employment restriction applicable to former "senior" employees. Procedures for the designation of components are prescribed in 5 C.F.R. §§ 2641.201(e). Current component designations are set forth in Appendix B of part 2641.

Designated Agency Ethics Officials are required by section 2641.201(e) (3) (ii) to forward to OGE by November 30 of each year "a letter stating whether components currently designated should remain designated . . . ." If your department or agency currently has components that are designated for purposes of 18 U.S.C. § 207(c) and no changes are needed, please confirm in writing that the current list of designations in Appendix B does not require revision. Any request to modify the existing list of components should be submitted in accordance with the procedures set forth in section 2641.201(e). We ask that each "parent" department or agency submit a consolidated response on behalf of all of its components. You need not reply if your department or agency currently has no designated components and you do not wish to request the designation of any component.

We want to take this opportunity to acknowledge that several agencies have requested modifications since the last OGE rulemaking to amend Appendix B of part 2641. See [64 Federal Register 5709](#) (February 5, 1999). During the intervening period, among other things, OGE has been re-examining its criteria and process for designating separate components. OGE now expects to proceed in the

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near future with a final rule amending Appendix B. In this connection, we ask that all agencies that have submitted any outstanding request to modify their component designations please confirm with OGE that their requests remain current and consistent with present law and agency organization.

We very much appreciate your cooperation in this matter. If you have any questions, please contact Richard M. Thomas, Associate General Counsel, at 202-208-8000, ext. 1152.