

UNITED STATES OFFICE OF GOVERNMENT ETHICS



June 2, 2025
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PROGRAM ADVISORY

TO: Designated Agency Ethics Officials

FROM: Shelley K. Finlayson
Chief of Staff and Program Counsel

SUBJECT: Annual Update of Post-Employment Component Designations
(18 U.S.C. § 207(c)) due to OGE by July 1, 2025

The Director of the U.S. Office of Government Ethics (OGE) may, upon a request made by an executive branch agency, designate a component of an agency as a separate department or agency¹ for purposes of the post-employment restrictions applicable to “senior” employees.²

By July 1, 2025, agencies that currently have such components designated³ must confirm to OGE in writing that their current designations are acceptable. Agencies that wish to request new designations should submit a request to modify the current designations. Agencies are encouraged to consider the effect of organizational changes to the agency or a designated component prior to responding.⁴

Any request to modify the current list of component designations should be submitted according to OGE’s regulatory procedures.⁵ OGE requires each agency headquarters to submit a single written response on behalf of all of its components. No reply is required from agencies that do not have component designations and do not wish to request them.

If you have any questions, please contact Kim Sikora Panza at (202) 482-9300 or klspanza@oge.gov.

¹ “[W]henver the Director of the Office of Government Ethics determines that an agency or bureau within a department or agency in the executive branch exercises functions which are distinct and separate from the remaining functions of the department or agency and that there exists no potential for use of undue influence or unfair advantage based on past Government service, the Director shall by rule designate such agency or bureau as a separate department or agency.” 18 U.S.C. § 207(h)(1).

² 18 U.S.C. § 207(c).

³ 5 C.F.R. pt. 2641 app. B.

⁴ See 5 C.F.R. § 2641.302(g)(1); 5 C.F.R. § 2641.302(g)(2) (“When it is determined that appendix B to this part no longer reflects the current organization of a parent agency, the DAEO shall promptly forward recommendations for designations or revocations in accordance with [the component designation procedures].”).

⁵ 5 C.F.R. § 2641.302(e).

