

## CLIENT ALERT

### To Recuse or Not to Recuse: OGE Updates Guidance

Jul.26.2016

On July 26, 2016, the Office of Government Ethics issued a final rule updating the Standards of Ethical Conduct for Employees of the Executive Branch, subpart F, “Seeking Other Employment” (5 C.F.R. 2635), to clarify recusal requirements. Recusals are required when the scope of the federal employee’s duties has a “direct and predictable” effect on the financial interest of an entity with whom the employee is either negotiating prospective employment or with whom the employee has any agreement concerning prospective employment, and the final rule also adds a new section to implement the statutory notification requirements under section 17 of the STOCK Act, which applies to individuals required to file public financial disclosure reports.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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