

**From:** [SAVANNAH MARION FELTON](#)  
**To:** [2635 Modernization](#)  
**Cc:** [KATHLEEN ORAM](#); [RAYMOND PEELER](#)  
**Subject:** Proposed Amendments to Standards of Conduct - Comments from the EEOC  
**Date:** Monday, April 24, 2023 8:59:07 AM

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Good morning,

The Equal Employment Opportunity Commission (EEOC) submits the following comments in response to the Office of Government Ethics' Proposed Amendments to Standards of Conduct

RIN 3209-AA43

1. We recommend that OGE add an additional example regarding the phrase "with whom the employee has dealt with in the course of federal employment" (in 2635.702(b)) to illustrate that the term "federal employment" encompasses all three branches. For example, if an EEOC employee previously worked with someone while they both were assigned to a congressional office, the now-EEOC employee should be able to use their EEOC title to recommend the person they worked with while they were both employed in the legislative branch.
2. We recommend increasing the monetary thresholds for the gift exceptions at (2635.204(a)) and 2635.304(a) to account for inflation. This amount has not been updated to reflect the current economy in decades.
3. We recommend removing the requirement that an employee must be "on the employee's own time", and that they may not be on work travel, in order to accept attendance of an event under 2635.202(g) (the WAG rule). We are unclear of the rationale behind these requirements. If the meeting qualifies as a WAG, and the agency determines that it is in the agency's best interest that the employee attend, it follows that the WAG is job-related. It would therefore make sense that the employee can attend in their official capacity.

Thank you,  
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