



United States Department of the Interior

June 5, 2021

MEMORANDUM

To: Heather C. Gottry, Director, Departmental Ethics Office
& Designated Agency Ethics Official

From: Elizabeth Klein, Senior Counselor to the Secretary

Subject: Ethics Recusals & Screening Arrangement

This memorandum serves to document my ethics recusals and establishes the screening arrangement that I am implementing in order to ensure that I comply with all recusal and other ethics obligations required by law. Additionally, this memorandum fulfills the requirement established in Section 4(a)(iii) of Executive Order 13989 entitled, "Executive Order on Ethics Commitments by Executive Branch Personnel" (Jan. 20, 2021) (Ethics Pledge).

I have consulted with the Departmental Ethics Office (DEO) and have been advised about my recusal obligations while serving as an appointee of the U.S. Department of the Interior (DOI). As reflected in my Ethics Guidance on Recusal Obligations memorandum, dated June 4, 2021, which provides ethics guidance based on my certified New Entrant Public Financial Disclosure Report (OGE Form 278e) and information that I have provided to the DEO, I understand that I have a continuing obligation to limit my personal and substantial participation in certain matters in which I have either direct or imputed financial interests, or personal or business relationship(s), pursuant to ethics laws, regulations, and the Ethics Pledge, which I signed on January 23, 2021.

SECTION 1 – SCREENING ARRANGEMENT

In order to help ensure that I do not participate in matters relating to any of the individuals or entities discussed in my Ethics Guidance on Recusal Obligations memorandum, and as summarized and listed on the attached List of Recusals and Quick Reference Chart, I have taken the following steps to implement a screening arrangement:

1. In coordination with the DEO, I have established the screening process below to assist in screening DOI matters directed to my attention or that require my participation which

also involve the individuals or entities on the attached List of Recusals and Quick Reference Chart.

2. I have instructed my Screener to review DOI matters directed to my attention or that require my participation which involve the individuals or entities on the attached List of Recusals and Quick Reference Chart in order to determine whether I am recused from participating in the matter in question. Gareth Rees, Immediate Office of the Secretary, currently serves as my Screener.
3. All matters involving the individuals or entities listed on the attached List of Recusals and Quick Reference Chart should be directed to my Screener without my knowledge or involvement until after the applicable recusal period ends.
4. If my Screener determines that a matter involves any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart and that I am recused from the matter, then they will refer the matter to Larry Roberts, Chief of Staff, for action or assignment, without my knowledge or involvement.
5. I will continue to personally take my calls and screen my e-mail communications. If a matter involving any of the individuals or entities listed on the attached List of Recusals and Quick Reference Chart is directed to my attention, I will not take any action, but immediately forward the matter to my Screener for review. If I am recused, then my Screener will refer the matter to Larry Roberts, Chief of Staff, for action or assignment, without my knowledge or involvement.
6. I will provide my Screener with a copy of this memorandum and attached List of Recusals and Quick Reference Chart, as well as my Ethics Guidance on Recusal Obligations memorandum, so that my Screener will fully understand the purpose and scope of my recusal obligations. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, it is my expectation that my Screener will seek the assistance of the DEO if they are ever uncertain whether I may or may not participate in a matter.
7. I will also provide my principal subordinates with a copy of this this memorandum and attached List of Recusals and Quick Reference Chart. I will further instruct my principal subordinates that all inquiries involving my recusal obligations with respect to the individuals or entities listed on the attached List of Recusals and Quick Reference Chart should be directed to my Screener without my knowledge or involvement.

I understand that for the duration of this screening arrangement that I commit to working closely with my Screener and diligently reviewing issues, actions, and decisions that come before me in order to determine whether any of the individuals or entities discussed in the Ethics Guidance on Recusal Obligations memorandum and listed on the attached List of Recusals and

Quick Reference Chart are involved in the issues, actions, and decisions. I have been advised that the identification of party matters pending within the DOI in which the individuals or entities listed on the attached List of Recusals and Quick Reference Chart are parties or represent parties, may require my Screener, Bureau or Office staff members, Solicitor's Office staff assigned to the matters in question, and the DEO to carefully review my potential participation. Additionally, I understand that there may be times when there will be a delay in reviewing and potentially clearing my participation in matters as a result of screening for ethics compliance. I understand that, while efforts can and will be made to minimize any delays created by ethics recusal reviews, these delays may impact my ability to promptly participate in matters, including certain meetings and other communications.

SECTION 2 – UPDATE THE DEO & SCREENING ARRANGMENT AS NECESSARY

In consultation with the DEO, I will revise and update this memorandum whenever warranted by changed circumstances, including changes to my financial interests, changes in my personal, business, or other covered relationships, or any changes to the nature of my Department duties. In the event of any required updates to my screening arrangement, I will provide a copy of a revised memorandum and attachment to my Screener, my principal subordinates, and the DEO. Finally, I understand that ethics advice must come from the DEO, as only a designated ethics official can make ethics determinations on which Department employees may authoritatively rely upon and will consult with DEO as necessary and appropriate.

Attachment – List of Recusals and Quick Reference Chart

Cc: Larry Roberts, Chief of Staff
Gareth Rees, Immediate Office of the Secretary

Attachment
List of Recusals and Quick Reference Chart

List of Recusals and Quick Reference Chart

Based on information provided to the Departmental Ethics Office (DEO), this attachment lists your recusals from current positions and interests, as well as your former clients, former employers, financial interests, and other recusals. The inclusion of an individual or entity on this list does not necessarily mean that a determination has been made that you will be excluded from participating in all issues, actions, and decisions related to the individual or entity at the Department of the Interior (DOI). Rather, the placement of an individual or entity on this list indicates that further screening must take place and, if necessary, additional advice from the DEO should be sought.

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
George Washington Middle School Parent Teacher Association			Do not participate personally and substantially in any particular matter that you know has a direct and predictable effect on your personal or imputed financial interests	18 U.S.C. § 208	Participation only permitted if a written waiver, pursuant to the asset qualifies for an exemption; scope of the recusal will be modified when you are no longer a board member for this entity
State Energy & Environmental Impact Center at NYU School of Law (State Impact Center)	Do not participate personally and substantially in a particular matter involving specific		Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your	E.O. 13989; 5 C.F.R. § 2635.502	

¹ Including serving as an “officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee.” 5 C.F.R. § 2635.502(b)(1)(iv).

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
American University	<p>parties (PMSP)² that is directly and substantially related to this former employer</p> <p>Do not participate personally and substantially in a PMSP that is directly and substantially related to this former employer</p>		<p>official duties and seek DEO advice, as appropriate</p> <p>Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate</p>	<p>E.O. 13989; 5 C.F.R. § 2635.502</p>	
PT Fund, Inc. (the Biden-Harris Presidential Transition Team)	<p>Do not participate personally and substantially in a PMSP that is directly and substantially related to this former employer</p>		<p>Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate</p>	<p>E.O. 13989; 5 C.F.R. § 2635.502</p>	
State of Maryland		<p>Consider appearances before personal and substantial participation in a PMSP if you know the</p>	<p>Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>Covered relationship with former employer/client</p>

² For the purpose of the Ethics Pledge, the term “particular matter involving specific parties” has the meaning set forth in 5 C.F.R. § 2641.201(h), except that it also includes **any meeting or other communication relating to the performance of an employee’s official duties**, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties.

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
State of Massachusetts		former employer/client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	impartiality in the performance of your official duties and seek DEO advice, as appropriate		ends on January 16, 2022 ³
State of Massachusetts		Consider appearances before personal and substantial participation in a PMSP if you know the former employer/client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship with former employer/client ends on January 16, 2022
State of Minnesota		Consider appearances before personal and substantial participation in a PMSP if you know the former employer/client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship with former employer/client ends on January 16, 2022

³ Covered relationship with a former employer or former client ends one year after last performing personal services or until any outstanding financial obligation, such as repayment of a capital account or payment of an outstanding fee, is satisfied, whichever is latest.

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
State of New York		Consider appearances before personal and substantial participation in a PMSP if you know the former employer/client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship with former employer/client ends on January 16, 2022
State of Washington		Consider appearances before personal and substantial participation in a PMSP if you know the former employer/client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	Consider appearances and take appropriate steps to avoid an appearance of loss of impartiality in the performance of your official duties and seek DEO advice, as appropriate	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship with former employer/client ends on January 16, 2022
Invariant, your spouse's employer ⁴			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

⁴ Including any person or entity for whom your spouse is serving as an “officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee.” 5 C.F.R. § 2635.502(b)(1)(iii).

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem		client relationship
Fitbit, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Palantir, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Cigna, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Ready Responders, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Hearst Corporation, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
BioIQ, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>client relationship</p> <p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>
DSM, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
TriNet, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Health Catalyst, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Antheia, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem		client relationship
ZocDoc, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
VSP, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Baxter, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Anduril, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Poet, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Carrier, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>client relationship</p> <p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>
Hudson Technologies your spouse's client			<p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Molekule, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Advantek, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Uranium Producers of America, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
			or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem		client relationship
Geothermal Exchange Organization, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Solugen, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Everlywell (now called Everly Health), your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Forward Health, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
CORE/Donor Alliance, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
MSA, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>client relationship</p> <p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>
Modern Health, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Sunnova, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Aeroseal, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or client relationship
Echostone, your spouse's client			Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer	5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)	Covered relationship ends when your spouse no longer has an employment or

Individual or entity	Within 2 years of appointment (on or after January 21, 2023)	Within one year of last providing services ¹	At all times	Authorities	Comments
Tri-County Electric, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>client relationship</p> <p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>
Accenture, your spouse's client			<p>or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p> <p>Consider appearances before personal and substantial participation in a PMSP if you know your spouse's employer or client is a party or represents a party to the PMSP and seek DEO guidance if you determine that there is an appearance problem</p>	<p>5 C.F.R. § 2635.502; 5 C.F.R. § 2635.101(b)(14)</p>	<p>Covered relationship ends when your spouse no longer has an employment or client relationship</p>