From: Skowvron, Beth A (Highmark Health)
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:36:31 AM
Attachments: image001.png

Hello,

I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- Remove the exception that makes compliance with regulation optional
- Relace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decision, policies, or regulations affecting them or the industries in which they have substantial interests
- Remove the offensive example involving an accused sexual harasser; and
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

Thank you,

Beth Skowvron
Executive Assistant - Senior & Vice President Pool

Sarah Marché, SVP, Pharmacy & Clinical Market Strategy
Tricia Gray, VP, Sales Enablement Solutions
Ed Yost, VP, Pharmacy Finance & Operations / Pharmacy Services
Raymond Capella, VP, Clinical Client Strategy / Pharmacy Services
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