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   20.2.2 The Importance of Contemporaneous Record of the Reasoning
      *Federation of Homemakers v. Butz*
   20.2.3 Informal Rulemaking Notice and Comment
      *Chocolate Manufacturers Assn. of U.S. v. Block*
      *United States v. Nova Scotia Food Products Corp.*
   20.2.4 Guidance, Interpreted Rule, or Substantive Rule?
      *Syncor International Corporation v. Shalala*
      *Berlex Laboratories, Inc. v. FDA*
      *Michigan Example of a Disguised Rule*
      *Promulgation without Notice and Comment*

20.3 The Power to Adjudicate
20.4 Executive Control of The Agencies
   20.4.1 HHS Oversight
   20.4.2 OMB
   20.4.3 Executive Orders

20.5 Administrative Discretion
   20.5.1 Congressional Review