

Guidelines for Gatekeepers

How to Help Implement a Screening Arrangement

You have been selected to act as a “**gatekeeper**” to help another agency official comply with conflict of interest laws and ethics regulations. Because the official has a potential conflict of interest with certain people or organizations, he has disqualified or “**recused**” himself from participating in agency matters that may affect those people or organizations.

Your role is to help implement a screening arrangement by (1) **screening communications** directed to the official, and (2) **redirecting matters** covered by the official’s recusal obligation (i.e., disqualification) to another agency employee. Specifically, you should:

Become Familiar with the Names of People and Organizations Covered by the Recusal Obligation.

If possible, you should obtain a copy of the official’s written screening arrangement. Otherwise, you may want to create a list and keep it handy for easy reference.

Screen All Agency Business Directed to the Official.

You should review all matters directed to the official to determine if they involve the people or organizations covered by the official’s recusal obligation. Communications that should be screened include, but are not limited to, telephone calls, letters and other written correspondence, requests for meetings, and assignments from supervisors. You may need to politely explain that the official is disqualified from participating in the matter.

Refer Covered Matters to the Designated Agency Employee.

The official’s screening arrangement will identify one or more agency employees who will act

in place of the official and handle matters covered by the official’s recusal obligation. When you determine that a matter is covered by the official’s disqualification, you should refer the matter to -- and only to -- the designated employee(s).

Do Not Involve the Disqualified Official.

You should give any matter covered by the official’s recusal obligation to the designated agency employee without discussing it or otherwise involving the disqualified official.

When in Doubt, Seek Guidance from Your Agency Ethics Official.

If you are not sure whether a matter is covered by an official’s recusal obligation, or if you have any questions concerning your role, contact your agency ethics official for further guidance.