



FACT SHEET

PBGC's Overall Excellence Submission

DESCRIPTION

On-line ethics training, kicking off with the subject of dealing with contractors in light of its large contractor population. PBGC followed up the training with an Ethics Open House where employees could have more nuanced discussions with ethics staff, and also developed an on-line survey to get feedback on the success of the training. Also, they have developed on-line filing of SF 278s, which includes prompts based on previously-filed information. For financial advisory contracts, PBGC requires a confidentiality clause that also applies to individual employees of the contractor and prevents them from appropriating its confidential information for their own use or disclosing it without PBGC authorization. For investment manager contracts, PBGC requires in each statement of work that the contractor act as a fiduciary.

PURPOSE

The tailored ethics guidance helps one department have guidance on the ethics issues they face on a regular basis and heightens their awareness of how the rules impact their daily work life. The computer-based training provides immediate feedback of what is learned and enables tracking; the surveys of the training enable the agency to improve future iterations. The online disclosure system will enhance technical accuracy in reporting and reviewers ability to identify and address potential and actual conflicts of interest. The contractor ethics provisions are aimed at the highest risk contracts that can be appropriately monitored to prevent abuse of nonpublic information.

PRODUCT ADAPTABILITY

Most of the initiatives and program enhancements are readily transferable.

AGENCY CONTACT

Philip Hertz, Deputy General Counsel

Hertz.Philip@PBGC.gov

202-326-4000