

# Whose Ethics Program is it?

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**Stuart Bender**

**U.S. Department of Agriculture**

**Rob Sadler**

**Office of Legal Counsel**

**OGE**

**Doug Chapman**

*Whose Ethics Program is it?*  
**Raising Visibility in Your  
Agency's Ethics Program**



**Presented by:**  
**Stuart Bender**  
**Director**  
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# Outline

1) Identifying the Responsible Stakeholders in YOUR agency's Ethics Program

2) Raising the Visibility of your Agency's Ethics Program.



# Part One

## Identify Your Strategic Partners



# Strategic Partners

**The Office of Government Ethics**

**The Agency Head**

**Designated Agency Ethics Officials  
(DAEOs)**

**Senior Executives (SES)**

**Managers and Supervisors**

**Employees**

# The Office of Government Ethics (OGE)

**OGE provides overall policy direction to Executive Branch agencies.**

**OGE “has authority . . . to order corrective and remedial action . . . to bring about compliance.”**

**But each agency has the primary responsibility to ensure compliance.**

**5 CFR § 2638.501(a)**





# The Agency Head

## Agency Heads “own” their Ethics Programs:

- The head of each agency has primary responsibility for the administration of the Ethics Program within his or her agency. 5  
**CFR § 2638.102(a)**
- He/She is responsible for exercising personal leadership in maintaining and carrying out their agency's Ethics Program. 5  
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# Agency Head Appoints the DAEO

**Designated Agency Ethics Officials “manage” the Agency’s Ethics Program.**

**Duties include:**

- **Liaison with OGE**
- **Financial Disclosure Program**
- **Training and Education Program**
- **Advice and Counsel Program**

**5 CFR § 2638.203**



# Senior Executives

**Executives are responsible for leading with integrity.**

**"Membership in the Senior Executive Service demands leadership, professional integrity, . . . and a commitment to the highest ideals of public service. . . . in an honest, fair, and ethical manner. OPM Guide to SES Qualification. pp. 1, 5 (Sept. 2012).**



# Managers and Supervisors

**Managers and Supervisors are also responsible for leading with integrity**

**OPM's Supervisory Qualification Guide requires:**

**Integrity/Honesty - "Models high standards of ethics."**

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# Procurement Officials

**Procurement Officials have an additional duty:**

**FAR 3.101-1 Standards of Conduct for Procurement Officials**

**Transactions relating to the expenditure of public funds  
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# All Federal Employees

**All employees are responsible for the Ethics Rules.**

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# ETHICS: A SHARED RESPONSIBILITY

Everyone, at each level, has a strategic part to play in a successful Ethics Program.

So, how do YOU raise visibility to get all of YOUR agency's stakeholders to “buy in”?

Now we are ready for Part Two . . .





# Part Two

## **Raising Visibility in Your Agency's Ethics Program**





# Raising Visibility

**Why is visibility so important?**

**For an Ethics Program to be effective, it must be seen (visible) and its services valued.**

**You may need to “jump” out of your fish bowl, to reach important strategic partners.**



# Five Steps to Build a More Visible Ethics Program

## Step 1

**Identify and list all possible stakeholders.**

- **Who are your key decision-makers?**
- **How are you reaching them now**
- **Is it effective?**



# Five Steps to Build a More Visible Ethics Program

## Step 2

### Enhance Communications with Stakeholders

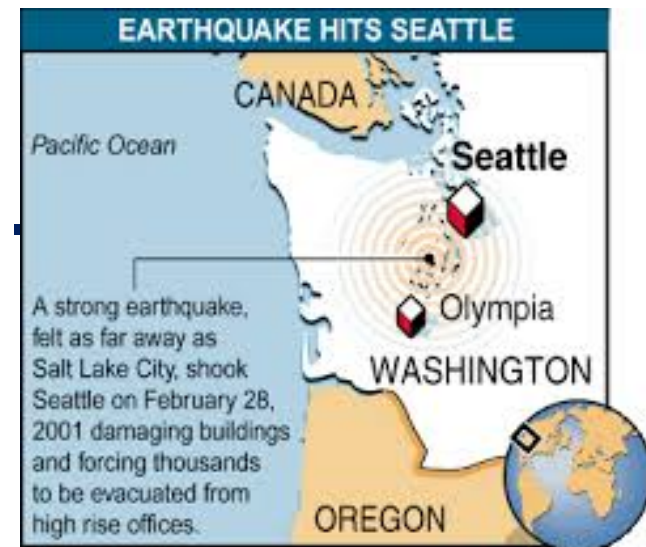
- **Listen Carefully.**
- **Understand THEIR needs.**
- **Understand that different audiences need different communication styles.**



# An Example of Different Communication Needs

**On February 28, 2001, Seattle, Washington experienced its worst Earthquake:**

- **6.8 on the Richter Scale**
- **\$1.2 Billion Dollars in Damages**
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# Earthquake Seattle 2001



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**MEANWHILE . . . At a nearby Seattle hotel, Microsoft Chairman Bill Gates was about to start a presentation on the company's new Windows XP Software.**

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# Different Audiences “Hear” Differently

**Some favor visuals . . . .**

**Others favor spoken words . . .**

**Some relate best to real-life examples . . .**



# Become the Master of Your Message Step 3

**Become the master of your message.**

**Ask yourself:**

- What is the message you want to send?
- What is the message you are sending?
- - Are they the same?

# Simplify the Complex

## Step 4

### **Simplify.**

**Federal Ethics rules are often complex.**

**Make everything as clear as possible.**

**USDA Case Study:** Ethics One-Pagers also known at USDA as “*Ethics in Brief*”

**Here's an example . . . . .**

## *Ethics in Brief:*

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# Be Bold, Innovate!

## Step 5

### **Look for ways to be innovative . . . .**

- **Small things can have a HUGE impact.**
- **Reframe Ethics training from one 60 minute annual training to 3 minute Ethics briefings every week (52 times)**
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# Case Study



So how do you get “in the door”?

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Make Your Message:

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# Be Visible



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# Questions?





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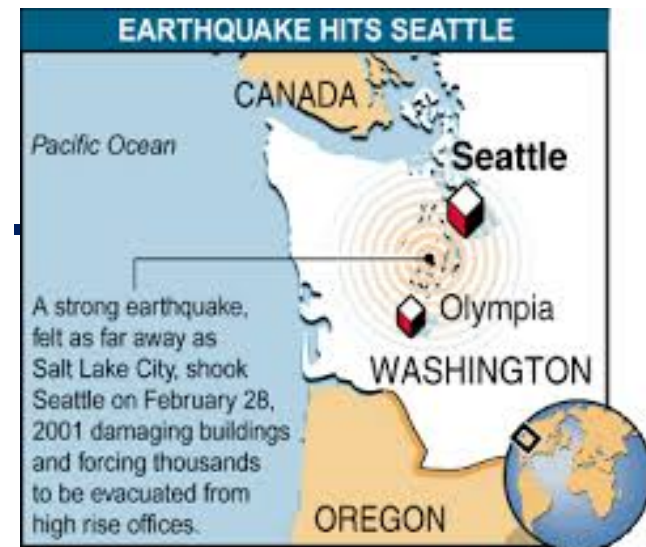
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