

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

Succession Planning & The Small Agency Ethics Program





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Discussion



Sudden or Planned Departures

Is your agency prepared to handle a sudden or planned departure by a key ethics official or officials?

- New opportunities
- Illness
- Family emergencies
- Retirements
- Agency restructuring



Making A Succession Plan



- Who does what?
- How to Implement

Standard Operating Procedures

- Financial disclosure written procedures statutorily required
- Beyond financial disclosure



Documentation and Archiving



-- ADDED BY (J. Mathai) ON 08/01/2014 --

BACKGROUND

- Filer was appointed in March 2010. This is filer's fourth annual report.

ETHICS AGREEMENT

- Filer appears to be in compliance with his ethics agreement. He agreed to resign from various outside positions. No divestiture of any stocks or bonds required. Filer does not hold positions he has agreed to resign from.

COVER PAGE

- Report was signed on 6/20/14, after receipt of a 45-day extension.
- Reviewed by agency within 60 days of filing.

SCHEDULE A

- Filer reported various assets including stocks, mutual funds, and municipal bonds. All assets, except one, reconcile either to the previous report, Schedule B, or to a 278-T filed between the previous annual report and the current report.
- New asset reported: "Publicly Traded Common Stock Inc" -- This asset was reported in schedule B as an acquisition due to a merger. The company is a corporation that sells widgets in the state of New York and does not appear to pose a conflict to the filer's position. Additionally the asset is held in the minimis amount category.

SCHEDULE B

- Part I: Transactions involving various stocks and mutual funds reported. Transactions involving stocks and municipal bonds occurring after the OGE waiver period have corresponding 278-T. No conflicts identified in any of the reported transactions.
- Part II: No gifts, reimbursements, and travel expenses. "None" box checked.

SCHEDULE C

- Part I: No mortgage reported. Confirmed that filer does not have a mortgage. "None" box checked.
- Part II: No agreements or arrangements. "None" box checked.

SCHEDULE D

- Part I: No outside positions reported. "None" box checked.

--- (END) -----

Documentation and Archiving

Archiving of advice & counsel

- Ethics email inbox
- Network folder



Cross-training



Cross-training

Cross-train additional agency staff

- * Supervisors
- * Agency's non-ethics attorneys

Utilize ethics official training offered
by OGE

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