



# ***Supervisory Review of Financial Disclosure Reports***

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# ***Purpose of Financial Disclosure***

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**“Serves to prevent conflicts of interest and to identify potential conflicts, by providing for a systematic review of the financial interests of both current and prospective officers and employees. These reports assist agencies in administering their ethics programs and providing counseling to employees.”**

*5 C.F.R. § 2634.104*



# ***Can Ethics Officials Serve the Purpose Alone?***

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- Does the EC know:
  - each employee's job duties?
  - every sector or entity that may be financially impacted by each employee's official actions?
- If not, how can the EC identify potential conflicts?





# ***How Supervisory Review Helps***

- 5 C.F.R. § 2634.605 allows intermediate review by the filer's supervisor.
- Supervisor is in the best position to consider potential conflicts between an employee's financial interests and work responsibilities.
- Supervisor has a need to know employee's financial interests so that they will not be assigned work which could create potential conflicts.





# *Agencies That Benefit*

- Large
- Geographically Dispersed Workforce
- Diverse programs
- Significant / Broad Impact on Outside Entities



But.....





# ***What About Secondary Benefits?***

- All Agencies can benefit from supervisors and leaders:
  - Maintaining awareness of the conflicts of interest and impartiality rules
  - Having a role in ensuring compliance
- Surveys show that 80% of personnel go to their supervisors first for ethics advice.
- Supervisors have other roles in the ethics program as “Agency Designees.”





**Questions/Discussion?**