

**From:** [Chairman Harper](#)  
**To:** [All NCUA Staff](#)  
**Subject:** Chairman's Message on Ethics at the NCUA  
**Date:** Friday, May 14, 2021 9:19:58 AM  
**Attachments:** [image001.png](#)  
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Creating and maintaining an ethical culture is an integral part of our mission as public servants. One of the ways we earn and maintain the public's trust is by understanding and complying with both the letter and the spirit of the federal ethics laws. The NCUA Board created the Office of Ethics Counsel to further strengthen NCUA's ethics and anti-harassment programs.

The ethics rules specify that each of us must avoid creating even an appearance of impartiality in the work we do each day. My expectation is that each of you will do your part to meet your ethical obligations and to support the smooth functioning of the NCUA ethics program, and I will do mine. Credit unions and their more than 124 million credit union members across the country depend on each of us to do our jobs with the utmost integrity.

These ethics laws and regulations are complex. That is why it is so important that you do three things to promote integrity at NCUA:

**First, attend and participate in NCUA ethics training sessions.** Additionally, an excellent [summary of criminal conflict of interest laws](#) can be found on the Office of Government Ethic's website. And, [NCUA-specific materials](#) can be found on NCUA Central. Use the embedded hyperlinks to access both documents.

**Second, make sure you file, review, and certify those financial disclosure reports and other forms that are so important to helping avoid conflicts of interest and appearance concerns.** Public Financial Disclosure Reports (OGE 278) are due from all NCUA SSPs on May 17, 2021, unless you requested and were granted a filing extension.

It is especially important that you understand that, like all other federal executive branch employees, you are prohibited by a criminal statute from working on any government matter that affects your own or your imputed financial interests. The test is whether the particular matters you work on affect any financial interest of a company in which you have a direct or imputed financial interest, and *not* whether your actions affect the company or its stock value.

The magnitude of the potential gain or loss is not controlling. It is not necessary to be a decision-maker for a violation to occur. For example, in some cases, participating in a policy discussion that is focused on a discrete industry, such as fintech, is enough to trigger your recusal obligation if you have investments in companies in this industry.

**Third, ask for guidance.** NCUA has a comprehensive ethics program as required by the Ethics in Government Act. Elizabeth J. Fischmann, our recently appointed Chief Ethics Counsel, leads this program as the Designated Agency Ethics Official for NCUA. Katherine Easmunt serves as the Alternate Designated Agency Ethics Official. Send your questions to [EverythingEthics@ncua.gov](mailto:EverythingEthics@ncua.gov) or reach out to your regional deputy ethics officials at:

**Eastern Region 1** – [REDACTED]

**Southern Region 2/AMAC** – [REDACTED]

**Western Region 3** – [REDACTED]

Every day, the NCUA team demonstrates its commitment to serving the American people. And, respect for both the letter and the spirit of our ethics rules is an essential element in your commitment to public service. Thank you for protecting the integrity of our work and the reputation of the NCUA.



**Todd M. Harper**

Chairman

National Credit Union Administration

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