

14TH ANNUAL OGE ETHICS CONFERENCE
SEPTEMBER 20-22, 2005
NEW YORK

ETHICS: A BROADER PERSPECTIVE

MAIN CONFERENCE PROGRAM

The Office of Government Ethics is pleased to provide conference materials distributed at the 2005 Annual Government Ethics conference. All handouts are available in Adobe PDF (PDF) format. In order to be able to view and print these files the [Adobe Acrobat Reader](#) 5.0 or above, available free from Adobe, must be downloaded and installed on your computer. **To receive a copy of the handouts please send an email request to Teresa Weakley at tlweakle@oge.gov. Please specify the session number or title in your email request.**

PLENARY SESSIONS

MARILYN L. GLYNN

General Counsel, U.S. Office of Government Ethics

HARRIET MIERS

Assistant to the President and Counsel to the President

ON-LINE PREPARATION AND REVIEW OF FINANCIAL DISCLOSURE REPORTS

Brian Howell, Chief, SOC Branch, Dept. of the Army

COL James Quinn, Chief, SOCO, Dept. of the Army

Ethics attorneys from the U.S. Army will demonstrate their new process developed over the past two years for filing financial disclosure reports on-line. This secure, on-line method of filing guides the filer through questions about reportable financial information and identifies missing and, in some cases, incorrect data. Future reports are prepopulated with the previous years' data to reduce the amount of work necessary to report the same data. Reports can be digitally signed and receive an on-line paperless review up through the DAEO.

(2 HANDOUTS AVAILABLE)

PUTTING FIRST THINGS FIRST

Homero Bayarena, Sr. Consultant, Franklin Covey

In the world of competing demands for our time, it becomes even more important for us to learn how to focus on the things that are important rather than urgent and to eliminate the unimportant. Come to a session that will be charged with energy and interjected with humor, and gain some valuable tips on how to improve your overall productivity.

(NO HANDOUT)

CONCURRENT SESSIONS

1. ISSUES SURROUNDING THE NEW NIH SUPPLEMENTAL REGULATIONS ON OUTSIDE ACTIVITIES

Raynard S. Kington, Deputy Director, NIH
Holli Beckerman Jaffe, Director, NIH Ethics Office
Barbara Fuller, Asst. Dir. For Ethics and Dep. Ethics Counselor, NIH
Traci Melvin, Dep. Dir. Ethics Office, NIH
Maureen Wilson, Asst. Dir. And Dep. Ethics Counselor NIH

In February, 2005, new supplemental ethics regulations for the Department of Health and Human Services were published in the Federal Register (5 CFR 5501 and 5502). These interim final regulations were formulated to primarily address ethical issues at the National Institutes of Health. This panel will discuss the ethics environment at NIH and will explore the impact of these regulations on NIH, including the implementation successes and challenges.

(1 HANDOUT AVAILABLE)

2. THINGS TO CONSIDER WHEN WRITING (B)(3) WAIVERS FOR ADVISORY COMMITTEES

Gregg Burgess, Associate General Counsel, OGE
Elaine Newton, Attorney-Advisor, OGE

This session is an interactive discussion among the panel members and the attendees on analyzing and writing 18 U.S.C. § 208(b)(3) waivers.

(2 HANDOUTS AVAILABLE)

3. THE NEW OGE FORM 450 & REGULATION

Amy Braud, Attorney-Advisor, OGE
Elizabeth Horton, Attorney-Advisor, OGE
Ira Kaye, Associate General Counsel, OGE

Come hear a discussion about the proposed changes to the confidential financial disclosure system. Presenters also will illustrate ways in which the proposed regulation could change the current filing requirements. The proposed regulation has been published in the Federal Register for comments, and attendees at this session will have the opportunity to present their comments about the new regulation and the new form.

(2 HANDOUTS AVAILABLE)

4. WHO'S YOUR AGENT? OR, CURRENT ISSUES IN APPLYING SECTION 205

Art Warren, Deputy Chief, Ethics Division, Dept. of Commerce
Susan Winchell, Associate General Counsel, OGE

This session will provide a brief overview of Section 205 but will primarily consider, through discussion of hypotheticals, how Section 205 applies to an employee's participation in outside activities involving professional and employee organizations.

(3 HANDOUTS AVAILABLE)

5. CONTRACTORS IN THE WORKPLACE

Matt Reres, Dep. General Counsel, Ethics and Fiscal, Dept. of the Army
Greg Weinman, Sr. Legal Counsel and Ethics Official, U.S. Mint, Dept. of Treasury

They may look like federal employees, have offices in our building, even work on our teams, but they are in fact contractors who come to work each day with a very different fiduciary duty, and they interact with the federal workplace under a very different set of rules, regulations and statutes than we do as federal officials. This session will examine the fundamental differences between federal employees and contractors, agency concerns regarding contractors in the workplace, and ethical and other legal landmines individual employees should consider when interacting with contractors in the workplace.

(1 HANDOUT AVAILABLE)

6. ISSUES SURROUNDING THE NEW NIH SUPPLEMENTAL REGULATIONS ON OUTSIDE ACTIVITIES (REPEAT SESSION – SEE #1)

7. HATCH ACT: A SNAPSHOT OF THE RULES THAT APPLY TO LESS RESTRICTED EMPLOYEES

Ana Galindo-Marrone, Chief, Hatch Act Unit, OSC

Approximately one-third of the U.S. Senate, all of the U.S. House of Representatives and thousands of offices at the state and local level are up for election in November of 2006. While most federal employees may engage in political activity while they are off-duty, the Hatch Act continues to prohibit employees from running for public office in partisan elections, raising money for partisan candidates and engaging in any political activity in a federal building. In this session, the Chief of the Hatch Act Unit for the U.S. Office of Special Counsel will provide information on how employees may be politically active during the upcoming election cycle without violating the Hatch Act. The session also will focus on what lessons were learned from the 2004 Presidential election.

(6 HANDOUTS AVAILABLE)

8. A DISCUSSION OF MSPB CASES INVOLVING THE STANDARDS OF CONDUCT

Stuart Rick, Dep. General Counsel, OGE

A discussion of how the agency that hears and decides Federal employee appeals from disciplinary actions has handled cases involving enforcement of the Standards of Ethical

Conduct and related misconduct.

(1 HANDOUT AVAILABLE)

9. **COMBINED FEDERAL CAMPAIGN AND OTHER FUNDRAISING REGULATIONS OR “WHY CAN’T I FUNDRAISE AT THE OFFICE FOR A GOOD CAUSE?”**

Jim Green, Associate General Counsel, OPM
Michael Korwin, Dep. Ethics Counselor, FDIC
Janet Roell Naughton, Attorney-Advisor, USPS

Fundraising in the Federal workplace raises a number of issues. This session will examine the interplay of regulations promulgated by the Office of Personnel Management involving the Combined Federal Campaign, regulations by the General Services Administration regarding soliciting in Federal buildings, and regulations by the Office of Government Ethics on fundraising issues. A question and answer session to discuss actual situations will assist ethics practitioners in understanding the complex issues.

(1 HANDOUT AVAILABLE)

10. **METRICS USED BY PRIVATE INDUSTRY TO EVALUATE THE SUCCESS OF GOVERNMENT ETHICS PROGRAMS** *(SESSION CANCELLED)*

Matthew Frank, Ethics Executive, Boeing

11. **AGENCY ETHICS PROGRAMS BEFORE OGE: HOW WE GOT FROM THERE TO HERE**

Jack Covalesski, OGE Retired

This session will cover the 4 years prior to the passage of the Ethics in Government Act of 1978 and the first year of the Office of Government Ethics. It will cover the issues that led Congress to pass the Act and why the ethics program was structured as we know it today. Come hear what your ethics program was like in 1974-79.

(NO HANDOUT)

12. **WHISTLEBLOWER RETALIATION**

Shirine Moazed, Supervisory Attorney, OSC

In recent years, the importance of government whistleblowers has been highlighted by federal employees coming forward to make disclosures on areas of national interest, including alleged security lapses at our national airports and the alleged mistreatment of detainees at Guantanamo Bay. OSC will provide an overview of the elements of whistleblower retaliation; recent OSC cases of interest; and a current case update covering the following topics: 1) When is a disclosure “protected” and 2) How has the Merit Systems Protection Board applied (and distinguished) the Huffman and Willis cases.

(1 HANDOUT AVAILABLE)

13. PROHIBITED PERSONNEL PRACTICES: A PRIMER ON THE DO'S AND DON'TS OF SUPERVISING EMPLOYEES

Richard Woodford, Associate Counsel, OIG, SEC

An introduction to the elements of Prohibited Personnel Practices (PPP) and the relevant questions that will help identify times when supervisors or Ethics Counsel should seek additional guidance.

(1 HANDOUT AVAILABLE)

14. A VIEW FROM THE PRIVATE INDUSTRY: LEARNING THE DANCE

Richard J. Bednar, Defense Industry Initiative
Jenny Kim, Crowell & Moring LLP
Beth Nolan, Crowell & Moring LLP

This session will highlight the missteps associated with interpreting the Executive Branch ethics rules for the private industry, address the proposition that companies who deal with the federal government should not be subject to additional regulations to govern their ethical conduct and highlight the major areas of confusion in government ethics.

(3 HANDOUTS AVAILABLE)

15. TEACHING ETHICS WITH AN ETHICS TRAINING GAME

Ken Human, Chief Counsel and DAEO, Stennis Space Ctr., NASA
Barbara Marino, InDyne, Inc.

Explore a fun-filled interactive demonstration of an ethics training course that employs a 20-question, multiple-choice game facilitated by laptop computers. The fast-paced upbeat game is designed to enhance the learning experience by engaging students in a participatory team-based training session. When the music starts, participants are thrust into a brain-storming session with their teammates to determine the "best" answer for each ethics question. Teams are assigned laptop computers and scores are displayed after each question to intensify the competition. The game moves quickly and when it's all over, students rave about the experience and the fun they had learning ethics.

(1 HANDOUT AVAILABLE)

16. THE DARLEEN DRUYAN CASE

Don Fox, Dep. General Counsel, Fiscal, Ethics and Civilian Personnel, USAF
Melinda Loftin, Deputy DAEO and Dir. Of the Ethics Office, USAF

Mr. Fox and Ms. Loftin are both Deputy Designated Agency Ethics Officials for the United States Air Force. As the two senior ethics officials both Mr. Fox and Ms. Loftin were involved over the past two years in what some have described as the biggest ethics

case since Ill Wind. Mr. Fox and Ms. Loftin both advised Ms. Druyan on procurement integrity and post government restrictions. They have both testified to law enforcement officials and met with the producers of 60 minutes. Come learn about one of the biggest cases in our history from those involved!

(NO HANDOUT)

17. **TEACHING ETHICS WITH AN ETHICS TRAINING GAME**
(REPEAT SESSION – SEE #15)

18. **DO’S AND DON’TS FOR DRAFTING IPA AGREEMENTS**

Charlie Brown, Asst. General Counsel and DAEO, NSF
Jeff Green, Senior Atty. and Deputy Ethics Counsel, DoD
Ira Kaye, Associate General Counsel, OGE

This session will focus on how best to vet, brief, counsel and train incoming IPA detailees to ensure that they abide by all of the ethics laws and provisions otherwise applicable to Executive Branch employees. The session also will briefly review the history and legal framework of the Intergovernment Personnel Act.

(1 HANDOUT AVAILABLE)

19. **THE RELATIONSHIP BETWEEN THE DAEO AND THE OIG**

Gladis Griffith, Dep. General Counsel, OIG, USPS
Maryann Grodin, General Counsel, OIG, NRC
Jerry Lawson, Asst. Counsel, OIG, SBA

This session will explore the relationship between the OIG and the DAEO with emphasis placed on areas of possible conflict and agreement.

(3 HANDOUTS AVAILABLE)

20. **FEDERAL EMPLOYMENT AND OUTSIDE ACTIVITIES: WALKING A MINEFIELD**

Stephen Bodolay, Dep. Ethics Counsel, DHS
David Maggi, Chief, Ethics Division, Dept. of Commerce

A discussion of the obligations of Federal service and the restrictions on personal activities that inter-relate with official duties. The panel will discuss situations in which employees’ activities may be characterized as either official or personal, and the rules that apply to each. This discussion will include an overview of the basic rules governing outside activities and the merging of official duties and outside activities. The panel will address such situations as service with professional societies; participation in widely-attended gatherings; teaching, speaking, and writing; and other situations in which outside activities and official duties may present a conflict.

(10 HANDOUTS AVAILABLE)

21. **HATCH ACT: A SNAPSHOT OF THE RULES THAT APPLY TO FURTHER RESTRICTED EMPLOYEES**

Ana Galindo-Marrone, Chief, Hatch Act Unit, OSC

Approximately one-third of the U.S. Senate, all of the U.S. House of Representatives and thousands of offices at the state and local level are up for election in November of 2006. In this session, the Chief of the Hatch Act Unit for the U.S. Office of Special Counsel will provide information on how further restricted employees may be politically active during the upcoming election cycle without violating the Hatch Act. The session also will focus on what lessons were learned from the 2004 Presidential election.

(6 HANDOUTS AVAILABLE – same handouts used for Session 7)

22. **THE NEW OGE FORM 450 & REGULATION**
(REPEAT SESSION – SEE #3)

23. **PERSONNEL LAW. HOW DO YOU KNOW IF THE PERSON IS AN “EMPLOYEE?”**

Janice Kaye, Alternate, DAEO, Federal Housing Finance Board
John Mantini, Asst. General Counsel and DAEO, Millennium Challenge Corporation

Federal agencies are accomplishing their missions through a variety of employment arrangements. Ethics officials have to be aware of the statutory basis related to each of these employment categories in order to render accurate ethics advice. Presenters will discuss the statutory basis for determining if a person is a Federal employee, the statutory basis for other employment arrangements, and the status of personal service and independent contractors.

(1 HANDOUT AVAILABLE)

24. **GOING HOLLYWOOD: AN INSIDE LOOK AT VIDEO PRODUCTION**

Bert DiBella, Sr. Attorney, DEA, DOJ
Cecilia Owens, Project Manager of Course Development, OGE

Tired of lecturing about ethics for an entire hour? Perhaps it's time to produce your own ethics video! This session examines the practical ins and outs of creating a video, including the keys to success and lessons learned. Brief excerpts from videos will be shown. Our goal is to save you production time and help you avoid last-minute surprises as you produce your video.

(4 HANDOUTS AVAILABLE)

25. **DIFFERENT APPROACHES TO THE STANDARDS OF CONDUCT/ETHICS IN THE LEGISLATIVE BRANCH**

James Abbott, Dep. General Counsel, Congressional Office of Compliance

Teresa James, Dir., Dispute Resolution, Congressional Office of Compliance

Standards of Conduct in the Legislative Branch of the Federal Government have many parallels with and distinctions from the Joint Ethics Regulation and statutory provisions that are applicable to Executive Branch employees. Representatives from the Congressional Office of Compliance will compare and contrast the JER and the ethics statutes and regulations that apply to Legislative Branch employees, with a specific examination of the development of regulations by the COC and case studies of specific issues and the resolution of issues unique to the Legislative Branch.

(NO HANDOUT)

26. **OIG BEST PRACTICES**

Kathy Buller, Chief Counsel, OIG, SSA
Elizabeth Dean, Counsel, OIG, FCA
Thomas Lehigh, Chief Counsel, OIG, DOT

This session will discuss the best practices identified by OIGs through the investigation of conflict of interest cases and how to assist your agency in developing a code of ethics for an organization not covered by the Standards of Conduct.

(2 HANDOUTS AVAILABLE)

27. **SGEs VS. REPRESENTATIVES: HOW DO YOU DECIDE WHICH DESIGNATION IS APPROPRIATE AND GAO'S VIEWS ON DESIGNATIONS MADE THUS FAR**

Susan Beard, DAEO, Dept. of Energy
Christine Fishkin, Asst. Dir., GAO
Amy Webbink, Sr. Attorney, GAO

This session will discuss the recent GAO review of Federal Advisory Committees and the review's implications. It will address the legal principles that are applicable to the selection of advisory committees.

(4 HANDOUTS AVAILABLE)

28. **THE EXPANDING ROLE OF THE IG COMMUNITY IN LAW ENFORCEMENT**

Noel Hillman, Chief, Public Integrity, DOJ

Over the past several years, there has been a substantial increase in the role and presence of the Offices of Inspector General in the investigation of criminal conduct involving federal departments and agencies, particularly as the resources of the FBI have shifted toward matters involving terrorism and national security. The Offices of Inspector General have been provided with statutory law enforcement powers, additional training, and the authority to carry out undercover operations. The Public Integrity Section and the United States Attorneys' Offices will work closely with the Offices of Inspector General as they carry out their significant responsibilities.

(NO HANDOUT)

29. 1353 VS. WAG: WHAT’S THE DIFFERENCE?

Cheryl Kane-Piasecki, Sr. Desk Officer, OGE
Lenny Loewentritt, Dep. Associate General Counsel, GSA

This panel will highlight the distinctions between the widely attended gatherings exception and the GSA travel authority (31 USC 1353). It will focus specifically on the “appropriate use” of each authority when accepting free attendance at certain events.

(5 HANDOUTS AVAILABLE)

30. GIFTS AND THE MILITARY

Steve Epstein, Director, SOCO, DOD

The presentation will discuss how the Department of Defense has handled the outpouring of assistance and gifts offered to specific service members, wounded service members, deployed service members, or just any service member. How do you say "no" to a Defense contractor who wants to pay for surgery for a particular wounded service member at a premier hospital? How do you say "yes" and stay within the gift rules? Real questions, real people, and high visibility. This session explores the limits of the 5 CFR 2635, subpart B, and invites novel solutions to serious problems.

(1 HANDOUT AVAILABLE)

31. TODAY'S FINANCIAL INVESTMENTS

Bill Mann, Sr. Investing Advisor, Motley Fool
Judy Kim, Dep. General Counsel, OGE

Compensation packages, particularly deferred compensation, have become a larger and larger component of management incentives at publicly traded companies. What are some of the elements that determine whether these compensation plans mean that the plan creates a beneficial interest at the corporation? And what are some of the more popular newer compensation instruments? Bill Mann, a senior investing editor and advisor with The Motley Fool, will discuss and answer questions about various types of complex investments and arrangements. Judy Kim from OGE will explain how the topics discussed by Bill should be reported on financial disclosure reports and analyzed for conflicts. This session will be helpful to those who review and perform conflicts analyses on interests found on financial disclosure reports.

(NO HANDOUT)

32. TRAVEL AND RELATED ETHICS AND APPROPRIATIONS ISSUES *(PART 1)*

Lenny Loewentritt, Dep. Associate General Counsel, GSA

Lenny Loewentritt currently is the Deputy Associate General Counsel for the Office of

General Counsel at the General Services Administration. Lenny will discuss various travel and ethics-related policies and regulations affecting all employees of the Government. He will discuss issues relating to frequent flyer benefits, premium class accommodations, the use of the Government charge card, acceptance of payment for travel expenses from non-Federal sources, the airline contract city pairs program, routing of travel, refreshments at conferences, use of rental cars while on official travel and a number of other travel related issues. There will also be opportunity for questions and answers on any travel-related issues.

(1 HANDOUT AVAILABLE)

33. FOREIGN GOVERNMENTS: EMOLUMENTS, GIFTS, AND DECORATIONS

Paul Corts, Asst. Atty. General for Administration and DAEO, DOJ
John Szabo, Sr. Atty. for Ethics, NRC
Gretchen Weaver, Ethics Counsel, NIH

The panel will summarize and discuss the major legal restrictions on working for or accepting gifts or decorations from a foreign government, such as the Emoluments Clause of the Constitution and the Foreign Gifts and Decorations Act. This discussion will include how to determine what is a foreign government and value of gifts from a foreign government under the law.

(1 HANDOUT AVAILABLE)

34. WHEN GOOD EMPLOYEES GO "BAD" - 5 WARNING SIGNS OF "ETHICAL LAPSES" LEADING TO MORE SERIOUS ISSUES

Richard Woodford, Associate Counsel, OIG, SEC

No federal manager intentionally hires a "bad" employee, so where do bad employees come from? This presentation takes a broader perspective examining minor "ethical lapses" and how unaddressed ethics issues lead to much more serious consequences.

(NO HANDOUT)

35. POST-EMPLOYMENT IN PERSPECTIVE: HISTORY AND PURPOSES OF SECTION 207

Rick Thomas, Associate General Counsel, OGE

This session takes a look at the "big picture" of the post-employment restrictions. Focusing on the history and overall purposes of the restrictions, we will examine such questions as why we have the laws we have, what are their purposes, why they cover what they cover and why they don't cover other things. Among other questions, we will explore how certain limits on the restrictions reflect compromises among competing concerns.

(7 HANDOUTS AVAILABLE)

36. APPROPRIATIONS LAW FOR ETHICS COUNSELORS

Gary Kepplinger, Dep. General Counsel and Ethics Counsel, GAO

Shared perspectives between basic ethics principles and appropriations law concepts and a discussion of recent appropriations law decisions.

(NO HANDOUT)

37. **TRAVEL AND RELATED ETHICS AND APPROPRIATIONS ISSUES (PART 2)**
(SEE #32)

38. **ETHICS ISSUES IN COMPETITIVE SOURCING**

Mark Hingston, Sr. Attorney, Dept. of Treasury

Dan Shaver, Chief Counsel, U.S. Mint, Dept. of Treasury

Although the concept of competitive sourcing has been around since the Eisenhower Administration, the recently amended Office of Management and Budget Circular A-76, decisions by the Government Accountability Office and a recent statutory change have led to significant changes in the processes by which agencies conduct public-private competitions. In this panel discussion, we will discuss the myriad ethics, standards of conduct, and other issues that ethics counselors need to be aware of as their agencies develop competitive sourcing plans and execute public-private competitions.

(NO HANDOUT)

39. **CONTRACTORS IN THE WORKPLACE**
(REPEAT SESSION – SEE #5)

40. **FEDERAL EMPLOYMENT AND OUTSIDE ACTIVITIES: WALKING A MINEFIELD** ***(REPEAT SESSION – SEE #20)***

NEW ETHICS OFFICIALS TRACK PROGRAM

This year OGE offered sessions designed specifically for the newer ethics officials (those with less than three years ethics experience). The sessions are listed as “NEO” sessions.

NEO1. OVERLAPPING OF ETHICS AND THE BAR RULES

Peggy Love, Alternate DAEO, EPA

Attorneys who work for the Federal government are subject to more than one set of ethics rules. This session will examine the similarities and differences in the Standards of Ethical Conduct for Employees of the Executive Branch and the ABA Model Rules of Professional Conduct with a focus on the areas of confidentiality and privilege, outside activities, and conflicts in dealing with past, present, and future clients.

(1 HANDOUT AVAILABLE)

NEO2. OGE PROGRAM REVIEWS

Phyllis Hoffer, Survey Manager, OGE
Jerry Chaffinch, Sr. Management Analyst, OGE
Dale (Chip) Christopher, Sr. Ethics Program Specialist, OGE

Program Review Division staff will discuss the ethics program review process, the employee ethics survey, and the agency program review evaluation form.

(2 HANDOUTS AVAILABLE)

NEO3. MISUSE OF POSITION

Cheryl Kane-Piasecki, Sr. Desk Officer, OGE

A brief overview of 2635, Subpart G: Provisions relating to the use of official time, authority, information, and resources, to which employees have access because of their Federal employment, with specific focus on endorsements/sanctions.

(2 HANDOUTS AVAILABLE)

NEO4. HOW IT ALL BEGAN: A HISTORICAL PERSPECTIVE ON THE CONFLICT OF INTEREST LAWS

Susan Winchell, Associate General Counsel, OGE

The notion that public servants should not use public office for private gain has been around in some form since ancient times. In the United States this concept was not codified into law until the middle and later parts of the 19th century, when the predecessor statutes to what we now know as Sections 203, 205, 207, and 208 were originally passed. This session will examine the historical context and mischief-making that led Congress and the President to pass laws limiting what employees could do, both on and off the job,

to protect the integrity of the government.

(NO HANDOUT)

NEO5. 18 U.S.C. § 208 (B)(1) WAIVERS WORKSHOP

Sandy Mabry, Sr. Desk Officer, OGE

A workshop designed to provide participants with hands-on experience of writing 208(b)(1) waivers that comply with the requirements of 5 C.F.R. § 2640.301. The waivers will focus on disqualifying financial interests arising from employee ownership of certain financial instruments.

(1 HANDOUT AVAILABLE)

NEO6. LEARNING THE NOMINEE PROCESS

Sandi Bitler, Nominations Liaison, OGE
Marilynn Brown, Desk Officer, OGE

Sandi Bitler and Marilynn Brown, Government Ethics Specialists, will present a summary of the administrative process and particulars of the financial disclosure nominee process. This is a basic session for ethics officials who are new to the nomination process.

(1 HANDOUT AVAILABLE)

NEO7. REMEDIES FOR CONFLICTING FINANCIAL INTERESTS

Tricia Franklin, Sr. Desk Officer, OGE

This course explores how to handle disqualifying financial interests by examining a number of remedies available to resolve conflicts, including exemptions, waivers and divestitures. Following the discussion on remedies, there will be a discussion on referring cases to the Inspector General and/or the Department of Justice in the event a violation of the statute occurs in spite of the remedies otherwise available.

(1 HANDOUT AVAILABLE)

NEO8. ETHICS AGREEMENTS AND COMPLIANCE

Jennie Keith, Desk Officer, OGE

Once you've determined that an employee needs to take specific action to prevent a conflict of interest from occurring, what's next? This session covers the ethics agreement concept and its history, how to develop a binding ethics agreement, and how an employee demonstrates compliance with the ethics agreement.

(1 HANDOUT AVAILABLE)