

January 8, 2009

Susan Winchell  
Designated Agency Ethics Official  
U.S. Department of Education  
400 Maryland Avenue, SW  
Room 6E225  
Washington, D.C. 20202

Dear Ms. Winchell:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of Education.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position as Chief Executive Officer of the Chicago Public Schools. For one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which the Chicago Public Schools is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, for the duration of my appointment as Secretary of Education, I will not participate personally and substantially in any particular matter involving specific parties in which I previously participated in my capacity as Chief Executive Officer of the Chicago Public Schools unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my unpaid position as a consultant to the National Association of Basketball Coaches. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which the National Association of Basketball Coaches is a party or represents a party if I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to 5 C.F.R. part 2635, subpart E.

Upon confirmation, I will resign from my positions with the following entities:

Ariel Education Initiative  
Chicago Cares  
Children First Fund  
Harvard University Board of Overseers  
Harvard University's Graduate School of Education  
Illinois Center Against Handgun Violence  
Jobs for America's Graduates  
Junior Achievement of Chicago  
Kellogg School of Management  
Scholarship Chicago Advisory Board  
South Side YMCA  
The Broad Center for Management of School Systems  
The Children's Center  
The Golden Apple Foundation  
The Renaissance Schools Fund  
University of Chicago's School of Social Service Administration

For a period of one year after my resignation from these positions, I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Sincerely,



Arne S. Duncan