

March 19, 2019

Marcella Goodridge-Keiller
Designated Agency Ethics Official
U.S. Department of Education
400 Maryland Avenue, SW
Room 6E225
Washington, D.C. 20202

Dear Ms. Goodridge-Keiller:

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 Assistant Secretary, Postsecondary Education, U.S. Department of Education.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, 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.

I resigned from my position with the Kentucky Council on Postsecondary Education in October 2018. I am currently negotiating a contract dispute regarding outstanding salary with the Commonwealth of Kentucky. If I begin my service as Assistant Secretary prior to receiving this payment, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the amount of this payment or the ability or willingness of the Commonwealth of Kentucky to make this payment, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). For as long as I am negotiating or receiving payments, and for two years after I receive my last payment, I will not participate personally and substantially in any particular matter involving specific parties in which the Commonwealth of Kentucky is a party or represents a party, unless I first receive a written waiver pursuant to the standards of 5 C.F.R. § 2635.503(c). If the negotiation ends and I receive no payment, 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 I know the Commonwealth of Kentucky is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position with the National Center on Education and the Economy. 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 I know the National Center on Education and the Economy is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I previously held a position with State Higher Education Executive Officers Association which ended in October 2018. For a period of one year after the end of my service with this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know the State Higher Education Executive Officers Association is a party or represents a party, unless I am first authorized to participate, pursuant to § 2635.502(d).

If I rely on a *de minimis* exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the *de minimis* threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

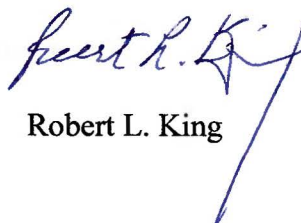
If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will meet in person with you during the first week of my service in the position of Assistant Secretary, Postsecondary Education, in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert L. King", with a long, sweeping flourish extending downwards and to the right.

Robert L. King