

Preparing Your Program for an Emergency:

Ideas to Consider

Financial Disclosure

- Consider alternative procedures for purposes of emergencies
 - Certification of no conflict that affected employees could sign in lieu of filing an OGE Form 450 in the event of an emergency

Financial Disclosure, cont'd

- Identify in advance certain positions that would simply be excluded from the filing requirement.
 - Agencies have been known to exclude some of their temporarily Federalized responders

Financial Disclosure, cont'd

- Now might be the time for agencies to re-examine their 450 designations overall
 - If in a time of emergency some officials could/should be excluded from filing or could reasonably simply file a certification of no conflict, maybe they shouldn't be filing in the first place

Financial Disclosure, cont'd

- Establish a lower level designation for determining things like filing extensions
 - For example, if your agency makes determinations at the HQ level, it may be a good idea to allow lower-level designations for those decisions during times of emergency

Financial Disclosure, cont'd

- Train non-ethics officials (supervisors, support staff) to complete technical review of financial disclosure reports

Financial Disclosure, cont'd

- Make use of filing extensions
- For public filing, liberally use the waiver of the late filing fee

Training

- OGE's annual training regulation gives agencies ample flexibility
 - Verbal/live training wasn't practical (See 5 C.F.R § 2638.704(e)(1))
 - Provide covered employees written ethics guidance (a series of memos discussing ethics issues in the context of the emergency, for example) in order to fulfill requirements

Training, cont'd

- Focus 2006 annual training on ethics-related emergency response issues
 - Relevant ethics issues should be incorporated into current training

Training, cont'd

- Identify decision makers and ensure they are trained on emergency-related ethics issues (e.g., FEMA DAE attorneys)

Training, cont'd

- Include information on emergency response issues in IEO for newly Federalized employees and deployed employees

Advice and Counseling

- Compile information from Katrina and other emergencies
- Develop manual/binder on emergency ethics-related issues as a reference during an emergency
- Create a database of advice specifically related to emergencies with shared access

Advice and Counseling, cont'd

■ Disseminate routine ethics advisories

- Holiday season = gift acceptance
- Hurricane season = gift acceptance, fundraising, volunteering, etc.

Get a Seat at the Table

- Foster relationships with upper-level management in advance of emergency situations
- Keep them aware of the importance of ethics, even in times of emergency
- Identify key players traditionally involved in the aftermath of emergencies (employee organizations, fundraising groups, etc.) and inform them in advance of their limits in terms of ethics