



NATIONAL GOVERNMENT ETHICS
SUMMIT
MARCH 8-10 2016

Establishing Effective Ethics Program Practices

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Your **SMART**
BUSINESS Moment

“Stealth” Ethics Training

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Goals

- Promote a culture of compliance with policies, business objectives, regulations, and criminal laws.
- Reinforce law-abiding, reasonable, and prudent behavior while discouraging illegal, unethical, and wasteful behavior.
- Contribute to revenue generation or cost savings.

Opportunities

- Less than 2,000 of our over 500,000 employees receive annual ethics training.
- USPS has experienced significant financial shortfalls since 2011, making money for new programs scarce.
- USPS is charged with running more like a business and has a culture that is more like a large company than a government agency.
- Ethics training viewed as “boring.”

What are Smart Business Moments?

- Short reminders or “lessons,”
- Covering compliance issues from laws to business goals,
- Originating from all parts of the Postal Service,
- Delivered in multiple formats to ensure wide dissemination, and
- Required in certain settings.

How do we generate them?

- Postmaster General chartered a Coordinating Committee with representatives from all eight major departments.
- Members submitted ideas – quality varied.
- About half were edited by a professional writer under contract to corporate communications.
- Ultimately, each final YSBM was reviewed and approved by vote of the coordinating committee.

When do we use them?

- The Postmaster General's October 7, 2015 Memorandum established expectations
- Any meeting > one hour with ten or more employees involving a formal presentation
- Staff meetings (once a month)
- Executive Leadership Team Meetings, COO Bi-Weekly Conference Calls, USPS Executive Roundtables
- Live USPS training programs

How do you find them?

<https://liteblue.usps.gov/smartbusinessmoments/>

Your **SMART**
BUSINESS Moment™



Better Safe Than Bitten

Better Safe Than Bitten

- All carriers are required to keep dog repellent clipped to their satchels or clothing. You can never be sure when it will be needed. A satchel and dog repellent can be used to defend against attacks by dogs or other animals.
- Supervisors must caution carriers: Use extra care in making deliveries when dogs and other animals are loose on a route. Never pet or feed a dog. Reassure a dog in a friendly manner — from a distance.

Better Safe Than Bitten

Keeping dog repellent at their ready helps carriers stay safe on their routes, reduces injuries from dog bites, and saves money for the Postal Service. And that's smart business.

Refer to Handbook EL-801 for more information.

Your **SMART
BUSINESS** Moment™



Fundraising at Work

Fundraising at Work

- The Combined Federal Campaign (CFC) is the only authorized solicitation of Postal Service employees on behalf of charitable organizations in the workplace.
- All other types of fundraising for charities at work are prohibited. For example, you cannot sell your daughter's cookies at work or ask your colleagues to purchase items from you to benefit your place of worship.

Fundraising at Work

- Fundraising at work can make coworkers feel coerced to contribute, affect morale, and distract us from the work at hand.

Limiting fundraising to the CFC is the law – and it's SMART BUSINESS.

Contact the Ethics Office (ethics.help@usps.gov) for more information about fundraising.

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Financial Disclosure Report Review at the U.S. Department of Education

Ethics staff at the U.S Department of Education brainstormed on how to improve the financial disclosure review process. This resulted in the development of 2 new protocols:

- ❖ *Public financial disclosure review form (2 versions: new entrant filers vs incumbent filers)*
- ❖ *Triage system for confidential and public financial disclosure forms*

Review Form for Public Financial Disclosure Report

What is the review form?

- ❖ *A review tool*
- ❖ *A due diligence check list*
- ❖ *A baseline standard of review that can be used to aid and facilitate the review of subsequent reports*
- ❖ *A transitional tool across form reviewers*

Review Form for Public Financial Disclosure Report (cont'd)

What does the review form look like?

**Public Financial Disclosure Review Notes:
Annual Report**

Name of Filer: NAME

Office and Position: OFFICE, POSITION

Calendar Year Covered: 2014

Full Name of all assets /income confirmed: Yes ___ No ___

Kind and type of all assets /income identified: Yes ___ No ___

Confirmed whether all assets /income have relevance to education: Yes ___ No ___

COVER PAGE		
QUESTIONS	Notes: New Entrant	Notes: 2014
Is the date of appointment listed in the upper left box?	<input type="checkbox"/> Confirmed that date of appointment is listed in upper left box.	<input type="checkbox"/> Confirmed that date of appointment is listed in upper left box.
Are all pages numbered?	<input type="checkbox"/> Confirmed that pages were numbered.	<input type="checkbox"/> Confirmed that pages were numbered.
Are appropriate reporting status boxes checked?	<input type="checkbox"/> Confirmed that appropriate reporting status boxes are checked.	<input type="checkbox"/> Confirmed that appropriate reporting status boxes are checked.
Did filer complete all required information (name, position, location of present office, positions held with Federal Government)?	<input type="checkbox"/> Confirmed that name was listed <input type="checkbox"/> Confirmed that Position for Which Filing was listed <input type="checkbox"/> Confirmed Location of Present Office was listed <input type="checkbox"/> Confirmed whether filer held position(s) with the Federal government during the preceding 12 months and that, if so, it was listed on the Report.	<input type="checkbox"/> Confirmed that name was listed <input type="checkbox"/> Confirmed that Position for Which Filing was listed <input type="checkbox"/> Confirmed Location of Present Office was listed <input type="checkbox"/> Confirmed whether filer held position(s) with the Federal government during the preceding 12 months and that, if so, it was listed on the Report.
Determine whether the filer is in a politically appointed position to determine whether the Ethics Pledge applies	<input type="checkbox"/> Confirmed that, if applicable, Presidential Nominee Subject to Senate Confirmation was listed <input type="checkbox"/> Filer is appointed to a politically appointed position and Ethics Pledge is contained in file, signed and dated (XX/XX/XX)	<input type="checkbox"/> Confirmed that, if applicable, Presidential Nominee Subject to Senate Confirmation was listed <input type="checkbox"/> Filer is appointed to a politically appointed position and Ethics Pledge is contained in file, signed and dated (XX/XX/XX)

	§ If did not cover the appropriate reporting periods, contacted filer to get the corrected information.	§ If did not cover the appropriate reporting periods, contacted filer to get the corrected information.
SCHEDULE A		
KEY ISSUES AT A GLANCE	<input type="checkbox"/> Exactly identified every holding in Block A. <input type="checkbox"/> Filer reported all assets and income from former employer (income, profit sharing plan, severance pay, stock, stock options, etc.) <input type="checkbox"/> Filer reported spousal income source and assets <input type="checkbox"/> Filer reported all retirement plans <input type="checkbox"/> All EIP boxes are accurately checked. <input type="checkbox"/> All type of income boxes are checked as required. <input type="checkbox"/> All amount of income boxes are checked. <input type="checkbox"/> All personally identifying information is removed from the Report (after informing filer) <input type="checkbox"/> No over-reporting of information (or if so explain how addressed)	<input type="checkbox"/> Exactly identified every holding in Block A. <input type="checkbox"/> Filer reported all assets and income from former employer (income, profit sharing plan, severance pay, stock, stock options, etc.) <input type="checkbox"/> Filer reported spousal income source and assets <input type="checkbox"/> Filer reported all retirement plans <input type="checkbox"/> All EIP boxes are accurately checked. <input type="checkbox"/> All type of income boxes are checked as required. <input type="checkbox"/> All amount of income boxes are checked. <input type="checkbox"/> All personally identifying information is removed from the Report (after informing filer) <input type="checkbox"/> No over-reporting of information (or if so explain how addressed)
PROVIDE TYPE OF ASSET, NAME OF ASSET, TICKER SYMBOL (if applicable), and NOTES that carry year-to-year	(Page #, Line #)	(Page #, Line #)
EARNED INCOME (FILER):	(Page 2, Line 1) Under "Other Income", reported actual amount of income and indicated that it was "salary".	Not reported - no income in 2014.
AMERICAN INSTITUTES FOR RESEARCH (AIR) Note: Written advice provided on XX/XX/XXXX	Confirmed that this position was listed on Schedule D, Part 1.	
EARNED INCOME (SPOUSE):	(Page 2, Line 2) Under "Other Income", reported "spousal salary"	(2.1) Under "Other Income", reported "spousal salary"
MONTGOMERY COUNTY PUBLIC SCHOOLS Note: Written advice provided on XX/XX/XXXX		
DEFINED CONTRIBUTION PLAN (FILER):	(Page 2, Line 3) Value: Checked Type of Income: Checked	(2.4) Value: Checked Type of Income: Checked
TIAA-CREF TRADITIONAL	Amount of Income: Checked	Amount of Income: Checked

Review Form for Public Financial Disclosure Report (cont'd)

Is the review form helpful?

- ❖ *Yes! The review form reduced the instances of filers forgetting to provide reportable information*
- ❖ *Yes! The review form ensured reviewers conducted a comprehensive technical review*
- ❖ *Yes! The review form made it easier for reviewers to identify and quickly resolve any conflicts of interest that arose during the review*
- ❖ *Yes! The review form reduced the review and certification time of the reports, both for new entrant, and in particular, incumbent filers*

Review Form for Public Financial Disclosure Report (cont'd)

How has Integrity.gov changed the use of the review form?

- ❖ *The Department uses Integrity.gov for 278 reports*
- ❖ *A modified version of the form is used for new entrant reports filed in Integrity.gov to (1) continue the standard baseline level of review of each report per filer and (2) continue to serve as a due diligence check list for reviewers*

Triage Systems for Financial Disclosure Reports

Where did the idea of triage come from?

- ❖ *With a small staff of less than 15 people, it is difficult to keep up with the volume of reports that come in with each filing season (approx. 1200 450 filers and 300 278 filers)*
- ❖ *Mechanism to ensure that review and certification of reports would occur in a timely fashion (quick turnaround for “low hanging fruit”)*
- ❖ *Prevents any one reviewer from being overwhelmed by a large number of reports*

Triage Systems for Financial Disclosure Reports (cont'd)

What is the triage process?

- ❖ *Separate triage sessions for 450 reports vs 278 reports*
- ❖ *Each week reviewers sit together in one room and review reports that have come in during the prior week*
- ❖ *The reports are preliminarily reviewed (“triaged”) for technical issues and conflict of interest issues – issues are flagged*
- ❖ *After triage, the reports are assigned to a reviewer for a comprehensive review and certification*
- ❖ *The assigned reviewer has the benefit of any notes made from the triage session for issues that require immediate attention, like an actual or apparent conflict of interest*
- ❖ *Reviewers have the opportunity to ask questions about items on a report, which often leads to group discussions about the conflicts analysis for various assets and financial holdings*

Triage Systems for Financial Disclosure Reports (cont'd)

What is the triage process for 278 reports filed in Integrity.gov?

- ❖ *Reports filed in Integrity are assigned to reviewers as they are received*
- ❖ *Reviewers may either triage their assigned 278 reports by (1) bringing their laptops to the triage session to review reports online or (2) independently reviewing their reports by a specific time on the day of triage*

Triage Systems for Financial Disclosure Reports (cont'd)

Is the triage process helpful?

- ❖ *Yes! All reports are preliminary reviewed within 7 business days of being received by our office*
- ❖ *Yes! Reviewers have the opportunity to discuss review issues and participate in large scale discussions about various topics, such as disqualification language*
- ❖ *Yes! Allows for an even distribution of reports amongst a small staff*
- ❖ *Yes! Decreases the likelihood of a backlog of reports for review*

Conclusions

Both processes have resulted in a better financial disclosure system and conflict of interest analysis at the Department.

QUESTIONS???

THANK YOU