



Supervisory Review of Financial Disclosure Reports

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Purpose of Financial Disclosure

“Serves to prevent conflicts of interest and to identify potential conflicts, by providing for a systematic review of the financial interests of both current and prospective officers and employees. These reports assist agencies in administering their ethics programs and providing counseling to employees.”

5 C.F.R. § 2634.104



Can Ethics Officials Serve the Purpose Alone?

- Does the EC know:
 - each employee's job duties?
 - every sector or entity that may be financially impacted by each employee's official actions?
- If not, how can the EC identify potential conflicts?





How Supervisory Review Helps

- 5 C.F.R. § 2634.605 allows intermediate review by the filer's supervisor.
- Supervisor is in the best position to consider potential conflicts between an employee's financial interests and work responsibilities.
- Supervisor has a need to know employee's financial interests so that they will not be assigned work which could create potential conflicts.





Agencies That Benefit

- Large
- Geographically Dispersed Workforce
- Diverse programs
- Significant / Broad Impact on Outside Entities



But.....



What About Secondary Benefits?

- All Agencies can benefit from supervisors and leaders:
 - Maintaining awareness of the conflicts of interest and impartiality rules
 - Having a role in ensuring compliance
- Surveys show that 80% of personnel go to their supervisors first for ethics advice.
- Supervisors have other roles in the ethics program as “Agency Designees.”





Questions/Discussion?