welcome to speaking of ethics an institute for ethics and government podcast well welcome to speaking of ethics so

0:14

patrick what are we going to talk about today today we're going to be having something of a debrief we've been having a variety

0:21

of conversations with ethics officials from across the government through our peer-to-peer series and

0:26

through individual consultations and today what we're going to do is invite some of them onto the podcast to

0:32

share with you some of their good practices and ideas that you can put to work in your agency

0:38

well that sounds really exciting so why don't we get to our first segment in this segment cheryl kane piasecki

0:44

speaks with angela white the alternate designated agency ethics official and julie berger a senior

0:50

attorney both with the social security administration they talk about challenges and solutions particular to

0:56

agencies with a geographically distributed workforce well welcome to you both um

1:01

in our peer-to-peer workshops and our one-on-one consultations we heard that many agencies like yours

1:08

have a widely distributed workforce and and we heard from you specifically

1:13

that in addition you have multiple organizational components with unique ethics issues given these

1:21

realities can you talk a little bit about the challenges you've faced in getting ethics messaging out into and

1:28

across your agency and and maybe how you've dealt with those challenges julie would you like to start sure

1:35

thanks cheryl so just as a very quick background we are a large agency almost 60 000 people

1:42

and we have 18 ethics attorneys and we provide all advice and counsel and financial

1:47

disclosure review and training to all 60 000 employees so we really are it

1:53

so given that reality we've had to look at the various

1:59

audiences and figure out how we can provide effective messages that resonate with employees managers

2:06

and executives so that they engage with us and obviously the one of the biggest challenges like how do we do that in an

2:13

agency of our size with the the staff that we have because really as you guys know no one size training

2:21

fits all you really have to try to tailor your message to make it effective um so one of the things that we have

2:27

done to tackle that is to try to figure out the most widely applicable scenarios

2:33

that are both interesting and engaging so that employees can put themselves in

2:38

the shoes of the person in the scenario and think this is something that i might face at

2:43

work this does resonate with me i could see how this would apply to my position or my outside work

2:50

but what we have really highlighted in every training that we provide is that you know public service is a

2:56

public trust there is a reason that you're in government service and it's different than private sector work

3:01

so once we sort of help folks understand why you're in public service how it's different and why you have

3:08

these ethics rules then we remind them hey ask before you act we are the ethics office come to us

3:14

come to us come to us so they probably get sick of hearing it from us but we try to always tie those messages

3:20

together public service is a public trust and come to us if you see anything that looks like this in your official

3:25

position and we can help you well in addition to what julie adds

**Timing Challenges**

3:33

i would point out that we also have timing challenges

3:38

we have employees who have extensive access to publicly

3:46

identifiable information and at our agency we have a lot of that type

3:52

of information but those same employees are in training

3:57

for eight weeks when they begin at our agency we don't want to disturb that training

4:04

but we need to make sure that they are aware of their ethical obligations from the

4:10

very beginning so we work with their management teams and their training

4:15

teams to integrate the ethics training as early as possible and as fully as possible with their

4:23

substantive training to make sure that they have awareness that they are aware of

4:30

us how to contact us and their responsibilities and we've had good success with

4:37

doing that process we've also learned that many employees do not have

4:44

prior government service so the whole idea of having ethical responsibilities

4:52

is new to them and so we have to meet them where they are and grow their knowledge from the

4:58

very beginning and we highlight over and over again the

5:05

importance of the ethics rules and that they should always come and ask for assistance

5:13

and that they can come directly to us because as an agency as large as we are you know

5:19

following procedure going through your management chain is a usually

5:25

a big lesson to learn and we try to educate the employees that you don't

5:32

have to go through your management chain to get ethics guidance we are here to help you and you

5:38

should come directly to us early and often the last thing i would add on this

5:46

point is we make sure that we have a message

5:52

that works for executives and brand new employees

5:58

so that even if you have some government experience even if you think you know the ethics

6:05

rules you're going to learn something new through our training through interacting with

6:11

the ethics office and that encourages employees to come to

6:16

us throughout their government career and that gives us the opportunity

6:22

to make sure that we are assisting them at every step

6:27

of their career if i could add one additional point of

**Challenge of Time**

6:33

resistance that i don't think is unique to ssa um and in that we are such a large

6:41

agency um i think it's true with every federal

6:46

agency it's the challenge of time um we've we've had a lot of people tell

6:52

us hey you know we're a public-facing agency we spend our time serving the public we cannot take people off of the front

6:58

lines for any kind of training at this point um so that that's one of the other

7:03

challenges that we faced in getting ethics out into the agency

7:09

and to that point i think given the size of your agency the distribution of your workforce the

7:15

diversity of your workforce it seems there are always either certain

7:20

groups or certain individual employees that are maybe more difficult to reach

7:26

how have you handled or even overcome points of resistance in the agency

7:32

i'll take that one cheryl the first thing that we have dealt with

7:39

is the point that julie raised with time we are using shorter sessions

7:46

and we are making sure that whenever possible we are mixing ethics with the normal

7:55

routine of meetings for each component or office

8:01

so that they begin to think of ethics as a part of their team a normal

8:08

operating consideration and we also use that time to explain the

8:15

benefits of interacting with the ethics office early it saves them time

8:23

it makes their offices more efficient and effective it allows employees to

8:30

focus on their particular duties instead of employees trying to become

8:37

ethics experts we really sell that we are the experts we are there to help them

8:44

and that seems to help make them more likely to seek our

8:50

assistance other ways that we have overcome points of

8:55

resistance is by using executive buy-in i think we are very fortunate at our

9:02

agency that our commissioner and the deo are strong proponents of our ethics

9:10

program and they always support our undertaking whether it's through

9:18

annual ethics training new employee training appearing in our messages

9:26

sending out emails agency-wide having messages at high-level executive

9:34

meetings on the importance of ensuring prompt completion of any ethics requirements

9:42

and also showing interest with regard to financial disclosure making sure that we

9:50

are getting accurate and timely reports and having that support at the top

9:57

emphasizes to everyone the importance of ethics and energizes them to make sure that they're

10:04

doing everything they can to me help us meet our requirements

10:10

we also depend very heavily on relationship building

10:15

from the very beginning we reach out to the

**Relationship Building**

10:22

necessary executives any new employees we also

10:28

make it a point to identify within various components or offices

10:35

who are the unofficial leaders that we can build relationships with

10:43

to know in advance when there might be a problem or find a

10:49

way to once again demonstrate that ethics is very important

10:57

and helpful to them the final piece of overcoming resistance as

11:05

julie mentioned earlier we have a broad array of employees

11:10

who do many different jobs and so we need to be able

11:17

to identify what's meaningful to them what is a language some terminology

11:25

that they will grasp that will grab and hold their attention so we take time

11:31

to learn um a little bit about each type of position so that

11:39

when we are having discussions about ethics rules or regulations we can use

11:45

terminology that really meets the needs of those particular

11:51

employees and the final thing that we try to do is make sure that our

11:58

communications are consistent from

12:03

the highest level employee to the lowest level employees so within that particular

12:09

component everyone is getting the same message about the importance of ethics and that helps that

12:17

whole component level set the expectation for

12:22

ethical behavior so you've talked a lot about meeting people

12:27

where they are and i know in our consultations with you we talked a lot about

12:33

how to expand the reach of ethics through strategic communications but most specifically through means

12:39

other than just formal training once a year so can you talk a little bit about some

12:45

specific examples of where you have found or created opportunities to engage about

12:51

ethics other than simply your formal training once a year sure so

**Opportunities to Engage**

12:58

we have tried to leverage the technology that's available to us that we may not

13:06

have even known existed for example before covet before we all started teleworking

13:14

we've we've taken teams for example and tried to do different things with

13:19

microsoft teams that we hadn't thought of or haven't done before we've created vods where

13:26

we had not worked on before and made those available to a more wide audience but we've also

13:33

done things like really focused on initial ethics briefings

13:39

um really talk to the folks who are coming in or who are shifting positions

13:44

between you know different federal agencies or from the private sector to really start their um and build our

13:52

relationship and talk to them about how we can help them and what to expect you know to hear from us so that at the

13:58

outset they um know us they want to communicate with us

14:04

and we have sort of already started to build that trusting relationship we also have taken advantage of some

14:09

agency-wide email opportunities we've been able to send out at

14:15

particularly um salient times you know for example

14:20

before the end of the year we may send out a gift reminder or you know during an election season we'll send out some hatch act reminders

14:27

using our agency-wide email systems we've also reached out to components

14:32

especially those who are particularly interested in having different ethics trainings and who are

14:38

receptive to our offers of training to have things like lunch and learn sessions or

14:44

we've asked you know hey can we come to your all hands meeting which is what the what ssa calls when a big

14:50

component invites all of their staff to meetings and whether we're there virtually or via video we've said okay well what

14:57

are some of the things that you think would be helpful you know for us to address or here are some of the questions that we've seen

15:04

recently with those resonate with your people um and tried to again you know tailor

15:10

our message and get get our foot in the door into things that are meetings that are already scheduled or

15:16

already existing so my final question to you is um

**What are some of the things that would be helpful**

15:22

we had a pretty expansive discussion during our communications consultation with with you um so is there anything you're

15:29

doing or planning to do differently as a result of those conversations and and even if not is there anything

15:36

specifically that you're doing that you'd like to share or recommend to your colleagues in the community

15:43

so i will take the first part we had um a great discussion you guys had some

15:49

suggestions that i think are really applicable and will help us streamline our processes and make our information you know more

15:56

digestible to employees so with that in mind we decided that we are going to use

16:02

shorter more frequent trainings especially for new employees but we're also going to

16:08

shorten our annual ethics training and try to provide them additional material

16:14

to review we're also going to use more electronic notices

16:19

that we haven't always taken advantage of in the past you know some of our components have

16:24

newsletters we can build in um an ethics corner and those we'll have

16:29

some when we get back into offices we realize that there are some monitors that um

16:36

show agency news in different areas of the nation so we're going to try to get an ethics corner

16:41

ethics bullets or ethics highlights or posters on those monitors that employees see when they go into the office

16:48

the other point that we took from you that we think would be very helpful for us we have a lot of

16:54

senior executives who switch components you know for example somebody will move from our budget office to hr

17:02

and when they are moving they don't necessarily know the um

17:09

culture of the component that they're moving to and so one of the things that we think would be helpful is if we brief

17:15

each senior executive as they move components and sort of tell them okay so here are the ethics

17:20

you know successes that this component has had and you know here are some of the challenges that we think that you're

17:26

going to face from an ethics perspective when you go in and again that's another way that we work to build these relationships and

17:33

you know get them to buy in that we are here to help you we are going to make ethics part of your business

17:39

decisions and we're going to do this in a way that's going to make ultimately your life easier because we're going to take

17:46

away you know some of these distractions that employees see or you know complaints or investigations

17:52

that may come down down the road later we're going to help you at the forefront to save you work later

**We strive to make those changes**

18:01

yeah i very much agree with all of those points that julie raised and we we strive

18:08

to to make those changes to build on our foundational belief that if

18:16

people know our face our name how to contact us and that our primary

18:22

goal is to help them live up to their requirement of public service

18:29

being a public trust that they will come to us

18:34

and we do everything we can to make ourselves available and to make it easy for them we are very

18:42

responsive because we find that if you have a

18:47

happy client because you gave them a quick and thorough response that they're more likely to come back

18:54

again so the earlier that we can begin building that relationship and and

18:59

demonstrating to them our value and responsiveness the stronger that relationship

19:05

will be and everybody benefits from that well i want to thank you both so much

19:11

for joining us um you're doing some wonderful things in your ethics program and it's really important that um those

19:18

things get shared with the wider community um thank you both so much for being with us

19:25

in this segment sheryl kin piasecki speaks with rebecca osborne adeo at the federal labor relations

19:30

authority and andrew wells adeo at the national transportation safety board they talk about

19:36

relationship building and communication at boards and commissions both of your program service

19:41

boards as well as other agencies staff so andrew beginning with you you know with whom have you cultivated

19:48

relationships and how are you using those relationships to support the program

**Maintaining Relationships**

19:53

so we try to maintain relationships uh with staff at all levels of the agency i have

19:59

weekly scheduled meetings with the staff members for each of our pas officials we only have five so that's a pretty

20:06

workable process for me um and through that you know i can share with

20:11

the board member staff that any upcoming issues that we might face we try to identify

20:18

any potential ethics issues that might be coming up especially as it relates to travel and interactions with outside entities

20:26

we also have regular meetings with our hr staff especially in light of the changes to

20:32

2638 a few years ago we've made a much greater effort to sort of incorporate

20:38

our human resources officials into the conversations with the ethics staff

20:45

part of the onboarding process for us really relies on

20:50

that successful relationship with our hr staff for supervisors we always make sure to

20:57

remain available for discussions with them we try to

21:02

whenever especially during the onboarding process you know if we have any questions about whether or not

21:09

there could be potential ethics issues for an oncoming or onboarding employee discussions with

21:15

supervisors can really help identify those before the person starts so we understand if

21:20

there's any ethics conflicts to mitigate as they're coming on board

**Building Relationships**

21:26

and rebecca can you address the relationship building you've been doing in your agency yes so one of the things that we try to

21:33

do with all employees um whether they're sgs normal employees or

21:39

management supervisors that sort of thing is to have the initial agency ethics orientation every employee

21:47

does that and of course that's required but as part of that we try to

21:53

talk to the individual both with respect to personal conflicts that they may have

21:58

coming in the door but also talking to them about what their

22:03

where ethics issues may come up over the life of their employment with

22:10

our agency and try to stress that again we're here to

22:15

help them avoid problems um and with respect to supervisors reminding

22:21

them of the unique role that they have in helping to foster transparency with

22:27

their employees and understanding life changes because every employee is

22:34

going to at some point both come in the door and most of them at some point will

22:39

leave to potentially go to another agency or go to an outside source and being able to begin to foster

22:47

a sense of trust in the employee and also in the supervisor the expectation

22:54

that these are normal lifestyle things and when they come up folks need to feel comfortable to come

23:00

and talk to the ethics office to avoid any potential conflicts so a

23:05

lot of that is done by talking to folks when they initially come in the door

23:11

and then over the course of a year we sealed questions as they come in we have

23:18

employees are pretty good about asking about ethics issues as they arise um

23:25

so that helps us to be able to head off a lot of problems before they become problems um and you know it's a kind of

23:34

life cycle of the employee and and try to bake it into the beginning

**Ethics Messages**

23:40

um in the peer-to-peer discussions we talked a lot about getting ethics messages through

23:46

out through both formal training but but also by other means so rebecca where have you found

23:52

opportunities to engage or or maybe to engage differently with your employees um yeah so in addition to

**Ethics Corner**

24:02

our annual ethics training which is open to all employees of the agency we

24:08

also do monthly and ethics corner in our monthly agency newsletters

24:15

where we try to address timely topics so for example our ethics corner this month

24:20

is going to be about the need to make sure that you file your taxes

24:25

as a good american citizen and also because it's required by the rules

24:32

of by ethical rules we also will when there are specific

24:40

topics that are coming up that may raise issues we try to have

24:47

a periodic kind of a brown bag lunch or something like that where we will address it last year although it's not strictly

24:54

something that's overseen by oge we did a hatch act brown bag where we also talked about you

25:01

know the possibility that there may be changes in employment uh following

25:08

any kind of an election and the ethics issues that would wan that would come up as a result of that

25:15

we strongly encourage not just individuals who have to file financial disclosure forms

25:21

to attend these events but everyone in the agency to attend the event

25:27

and uh so those are the primary ways that we communicate with people and then

25:33

of course there's the regular um our door is open please come and see us anytime

25:39

and andrew what what opportunities have you found to engage or maybe engage differently pandemic has

**Opportunities**

25:45

certainly forced us to rethink several of our processes early when we went to full telework we

25:53

initially posted a message to our internal portal about how ethics will apply under the

26:00

max telework policy i think that was a good and early way to sort of

26:05

help remind people that not a whole lot changes when you work from home i mean there

26:10

are some differences you might have to think about certain activities in specific ways but i think that was an early way for us

26:16

to sort of begin rethinking how we're going to get our ethics messaging out and we're using all of the tools that

26:22

are available to us including our internal portal you know our emails and then teams microsoft

26:29

teams and zoom have become very important platforms for us

26:35

we also whenever we do trainings especially our annual ethics training we send out surveys to the participants

26:43

to find out what worked well what topics they feel like deserved more attention

26:49

if there's anything that we missed and we're using those responses to help develop some targeted trainings for this

26:54

calendar year we're also thinking about this year so we were a paper 450 program

27:01

last year that obviously would not be workable and the current situation

27:07

and so we're doing an end of we just certified our last report last week

27:13

at least from our annual filers and we'll be sending out an end of 450 filing season uh a thank you

27:20

and uh email just for the participation from the agency and the support that we receive from both

27:26

employees and from supervisors and getting all of those reports received and reviewed in a timely fashion

27:32

one other thing that we restarted recently within the last few months is a monthly reminder to public filers

27:39

about their 278 t reports we had seen a couple examples of people who didn't

27:45

fully understand how those reports work and we felt it was just going to be an effective way to keep

27:53

public filers focused on that report we know that you know as things are

27:58

moving along at a rapid pace under these conditions and it's hard or it's easy to lose track of

28:04

certain things and that monthly reminder has definitely generated um a few questions most of them about things that don't need to be reported

28:10

but those communications i think are helpful in educating our staff about

28:15

what their ethics obligations are in particular relating to the periodic reports

28:21

well thank you both so very much for being with us um we really appreciate your time

28:26

in our final segment i had the opportunity to speak with eric doernberg the alternate designated agency ethics

28:33

official at the department of homeland security and scott thompson the a deo at the department of defense

28:38

about ethics communications challenges and solutions that are prevalent in large departments and

28:44

agencies i thank you both very much for joining us today you both lead ethics programs in large

28:50

departments so i'd like to focus on issues that are important in large organizations

28:55

so in your departments you have large management teams who are very important to the overall culture and upper management is especially

29:02

important so our first question is how do you engage entire leadership teams to promote

29:07

ethics across the enterprise and perhaps scott you'd like to get us started yeah sure patrick

**How do you promote ethics across the enterprise**

29:13

it all starts on day one and day one starts not necessarily when the person joins the department but really

29:19

for our most senior officials when they're identified to join the department so during the ethics vetting process that

29:26

precedes nomination we start having conversations not just about the financial disclosure forms not

29:32

just about the ethics agreement but really about what those documents mean in the larger context

29:38

and we have conversations with the future senior officials about promoting ethical conduct within

29:45

the department and then i think also we continue that through the onboarding process both with

29:50

the the officials that are presidentially appointed and senate confirmed but also with new political appointees

29:56

and really with all appointees in their initial ethics training and we ensure that they all have initial ethics

30:02

training promptly when they join the department and then we follow up with specific

30:08

training so for the most senior officials we engage their executive assistants and confidential

30:14

assistants in really in tailored training to help issue spot we engage with the officials and their

30:22

key staff to set up leader-led ethics training annually

30:27

and uh and we find that that works really well now that's at the headquarters level in the office of

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secretary of defense and then the challenge of course is how do you then inspire subordinate

30:37

component organizations to do the same thing and that is i think really where the the

30:43

tone from the top by the the top leaders at the secretarial level secretary of defense level really comes

30:50

into play because when that most senior leader gives directions to the other senior leaders

30:56

to also set tones with tone within their organization it really helps and then of course we

31:02

train our fellow ethics counselors uh to engage with the leadership teams

31:07

and their respective departments uh in the same way that we do at the secretary of defense level in the office of secretary of defense

31:15

fantastic it sounds like that's a really robust and coordinated uh effort across the the enterprise and erica your situation

31:21

at dhs is in some ways similar in other ways different uh so does this uh uh do you use similar

31:28

processes or are there things that you're doing that are maybe additional or different from those things at dod

**How do you promote ethics in a presidential transition**

31:33

oh no the it is very similar um and parallels a lot of what dod is doing

31:38

um one of the first things i try to do is usually especially in a presidential transition the first person that you're

31:44

that you often identify is going to be somebody like the white house liaison or the secretary is the nominee and um i

31:51

will directly um start educating and socializing the rules and and what we would like for them to do in

31:58

order to help us um perpetuate or promote an ethical culture within the department

32:04

so for example when i was vetting the secretary i asked him you know should you be confirmed i'll be

32:10

you know training all of your new appointees what would you like me to tell them about your your perspective and your expectations

32:16

on ethics and so i have that tidbit and i have used it um in training political appointees we

32:23

have done um basically specialized training for political appointees coming on board

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i use that in that training to let them know what the secretary's expectation is from day one

32:34

they received their ethics training on day one to make sure and then i customized the

32:40

training not only to socialize specifics like the ethics pledge but also to um explain to them how they

32:47

will be perceived so things that ethics officials often encounter is somebody will say hey i think this is a

32:54

great idea and coming from a careerist or subordinate office they will see it coming from a senior

32:59

counselor to the secretary and view it as a must do rather than a hey is this a possibility so i talk to them

33:06

about that even if they don't have a supervisory role i make sure that they understand that people are going to

33:11

see and hear what they say perhaps in a different way because they are senior officials who do who report directly to the senior

33:18

most officials in our department excellent um so you know that leads into our next question

**How do you identify leverage points**

33:24

there are people in the organization who are especially important to helping to steer and make change in

33:31

any large organization so i think this question is for either of you how do you identify

33:36

leverage points or those people and how do you use them to support the ethics program you know where do you

33:42

find the forecast for the uh the changes that you'd like to make or the promotion of ethics in your organizations

**How do you leverage to promote ethics**

33:49

well i think the key to any kind of um leveraging to promote ethics is to

33:57

um interplay it with the agency's mission the agency's motto and values one of the

34:04

first things i try to do for example is when we get a new um set of public affairs staff

34:10

is i try to sit down with them and i talk to them um both for internal messaging about

34:16

the culture of the department as well as external messaging to stakeholders and others um and

34:22

especially for things like speech writing for senior officials that they understand the kinds of what i

34:28

call them ethics temperature value sets so i give them like a list of words

34:34

that relate to ethics you know selfless service integrity um those kind of terminologies

34:41

that they should be thinking about and integrating um some of those come from our motto and our value set so they're easy to

34:48

interplay that is very important as well as looking at things like giving them

34:53

key examples of where we have seen ethics come up and why we are leveraging their participation in the ethical culture to

35:01

avoid oversight queries and um things that will distract us from

35:06

performing the duties of the department um such as a congressional investigation

35:11

for example excellent uh so it sounds like you know when you're communicating one of the good things to do is to engage with

35:16

those people who create communications and talk to those people who care about the things we're

35:22

worried about uh scott does that uh present itself differently or similarly a dod and and you know how do you figure out

35:29

how to make change in such a large large organization

**How to make change in a large organization**

35:34

right i agree with erica the public affairs officials are key to getting out the

35:41

message and giving voice to the senior leader's message i think there's also some some other

35:46

people that um in dod and probably also in dhs you know that we

35:51

touch on and work with closely i mean obviously the respective chiefs of staff of the big organizations the white house

35:58

liaison but we've also found you know it very effective to provide opportunities for

36:04

our secretary to be personally involved in the ethics program so one thing that we've been doing successfully

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for a couple of years now is that the secretary of defense will lead ethics training annually for the other

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most senior people in the department to include the secretaries of the military services

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to include the military service chiefs as well as the chairman of the joint chiefs of staff the undersecretaries in

36:28

the department we find that that's very effective because he says in an annual ethics message everybody

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should go all leaders should go lead ethics training and he models it himself i think that sends a really strong message and helps

36:42

especially in big organizations that are very globally dispersed it's important to start from the top and

36:48

and really push down hard to make sure that ethics training and ethics messaging is getting

36:54

out there um i also think that congress is important um that you know congress congress can

37:01

impose change on us so it's really important that we interact well with our committee of

37:07

jurisdiction the senate armed services committee in particular and their council so that we understand

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when changes are being considered in congress and also on legislative proposals that that

37:18

we may need as well that will support and help with the ethics program

37:24

excellent thank you and i think that's a really good example of using the chain of command using the management structures but also thinking outside of

37:31

the organization uh to raise the salience and to help understand the importance of ethics

37:37

so in our consultations over the last couple of months i think we've had some robust discussion and we're sort of

37:43

curious how it went if there's anything you're planning to do differently or are doing differently as a result of

37:48

those com conversations or anything you'd recommend to your colleagues throughout the community

**Strategic Communications**

37:55

yeah i mean i i think after our conversations with ogd on strategic communications we came out

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with some some good ideas particularly from social media and how to make that more

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dynamic maybe more recurring uh that you know we'll we've been uh

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talking about ways to incorporate that um as well um that you know that's

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really important um the other engagements that you know og consistently talks about is the

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leader-led aspects and having good good messaging from the top and you know director emery rounds has

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emphasized that in the in the past couple years in particular and that's been helpful because we

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we can use the the letter that emery sends to the senior officials um to you know again just emphasize the

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position of the or the emphasize the importance of setting the tone from the top and it's

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also helpful too because oge communicates pretty frequently with the white house and i personally have felt it's been

38:56

very helpful to receive those views uh that we can communicate back to our senior officials about administrative

39:03

administration positions on uh not only the letter of the ethics rules but also the spirit of the ethics rules

**Leadership**

39:11

ah fantastic uh thanks very much scott and eric is there anything uh you're doing differently at dhs as a result or

39:17

anything that you think is a really good idea that you'd like to make sure the community is aware of yeah and one of the things that i think

**Ethical Culture**

39:23

og identified in some of the leader leadership ethical

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culture initiatives that you have out there is to make sure that people um think about ethics constantly rather

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than just you know annually doing their financial disclosure or annual ethics training

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so i have incorporated some of the principles from the new um standards the program ones

39:49

about the employee responsibility and supervisory responsibility i have interlayed that in my training and socialization um reminding folks

39:56

that they need to be constantly communicating ethics not just once a year when it's time to handle it

40:02

handle compliance requirements um i think that has been very effective i am finding slowly but surely

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that the leadership and the political um infrastructure within the department is

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actually echoing and messaging that without my prompting which is great to hear i also like to make sure that people

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understand that ethics is not always a stick but it's also a carrot so i talk a lot about

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you know enforcement of ethics rules and program compliance but also rewarding and recognizing

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that amongst our employees and i think that that will reap benefits in the future

**Outro**

40:38

fantastic well thank you very much uh to both of you for taking the time to speak with us today

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we hope that these ideas and your experiences are helpful to the broader community and we're very grateful for you taking

40:51

the time to share your expertise thank you for joining us for this episode of speaking of ethics

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we look forward to joining you next time