**COMMUNICATION STRATEGY**

**A NEW TIMELINE (Initial Issues with Naomi Guzman and Dr. Singh-Smith)**

(1) Work closely with HR to have positions that need filing of a financial disclosure form be part of the employment posting. They will know, up front, that this position mandates the filing of a financial disclosure form.

(2) Notice on USA Staffing / USA Jobs / Onboarding notice.

(3) Include the requirement as part of the initial ethics orientation training. DAEO should have a presence here. This is for all new hires because it may take some time to determine who is a filer, and ALL employees need to take ethics training as government employees.

(4) Send an introductory email from the staff member actually reviewing document (not necessarily DAEO, too formalized) saying hello, letting the new entrants know about their filing requirements, conceding that it can be a complicated form, make yourself available for questions, set deadlines and the means for filing. Introduce why you have to do them, process for filing, and consequences for filing. Be sure to explain why there are consequences outlined in the regulation.

* This is where the Monroe’s Motivated Sequence will come into play:

Attention: “Welcome to your new role with AMH. We are so excited to have you on the team!”

Need: “As was established from the beginning, your position as a new entrant with our agency requires the filing of a 450 Financial Disclosure Form. This is a non-negotiable part of your employment.”

Satisfaction: “These are the deadlines for completion, and I will be your primary point of contact. You will direct any and all questions my way, and the form will be completed and submitted through [insert portal/email inbox/paper filing site, etc.]”

Visualization: “We are taking one thing off your plate. We know that you have so much going on as a new AMH employee, so getting this knocked off will make the process that much easier.”

Action: “You can do it! We are absolutely here for you and will sit down with you for the entirety of the form. You are not in this alone. The ethics office exists for this very reason.”

(i) Introductory Email, Note coming from ethics official explaining the whys and hows of filing a confidential financial disclosure report. Also discussing process, procedures, consequences for not filing, and the fact that the information will not be disclosed publicly.

(ii) Get HR to include Form 450 filing requirements in hiring packet, onboarding packet, and even job posting.

(iii) Threatening to turn off computer? Top-down technology restrictions if lack of ethics training/forms compliance

(iv) 5 CFR Section 2634.201(g) reference to extension, offer it/grant if for good cause if the employee is communicative. Need written permission/documentation to memorialize this as part of the official record.

(5) Set up automated reminders to filers, especially those who aren't responsive.

(6) Check-in and immediately contact those who haven't started (15 days out from deadline)

State opportunity for meeting, let them know about the deadline, ask as to why they haven't started (SUBJECT: REMINDER OGE 450DATE). Send more emails.

(7) Follow-up with those that need assistance, but have started, and let them know that you can answer questions. Let them know you can walk through the form with them one-on-one, or the manager overseeing the Unit so you can get on their calendar. That is, if they need help. People are busy! Directly call those that are not heeding your requests. Let me get something off to-do list.

Be nice as possible but may require escalation to manager and reminder of consequences and rules/regulations that were made known in Number (4) introduction.

You might get some angry or recalcitrant spouses who either don't know the extent of spouses' finances or don't believe that they should disclose their private information.

(8) Automated emails serve as consistent reminders

(9) Emails sent out from ETHICS office, en masse. It's like tax season! (say that informally)

(9) Additional, personalized emails offering the possibility of extensions (start at a week, increase daily count at that point) on account of extenuating circumstances. Let me walk through you on this! Ask for reason on extension. Can depend on the situation with the individual employee. Looks good on us.

(10) Personally, following up 10 days from deadline to see if they're experiencing issues.

(11) This is what it is. 278 fine imposed. Go to leadership and say that you've done everything you can.

**LEVERAGING INITIAL ETHICS ORIENTATION**

What really helps is start with the impartiality and letting them know about the "fence around the pool" These 208 rules aren't in place to hurt you, but rather, to protect yourself, the agency, and the public trust. If you follow the obligations, report any potential conflicts of interest, and you maintain an active stream of communication with us, we can absolutely help you. Further, there will be little in the way of consequences that you will encounter.

Begin by identifying any specific prohibited holdings that your agency might have. Depending on the agency and the nature of the position, certain holdings may be explicitly not permitted.

PLEASE READ THE FORM AND THE DIRECTIONS CAREFULLY. Ideally, a couple of times! That way, you know exactly what information is expected of you what to disclose/not disclose. If you have questions, reach back out to us and we can work through the document together. It's much better if they're proactive and give too much. They may circle back and ask more questions, but the more they do it, the more familiar they become with the forms. It becomes less hard, and they report exactly what needs to be disclosed on the 450s.