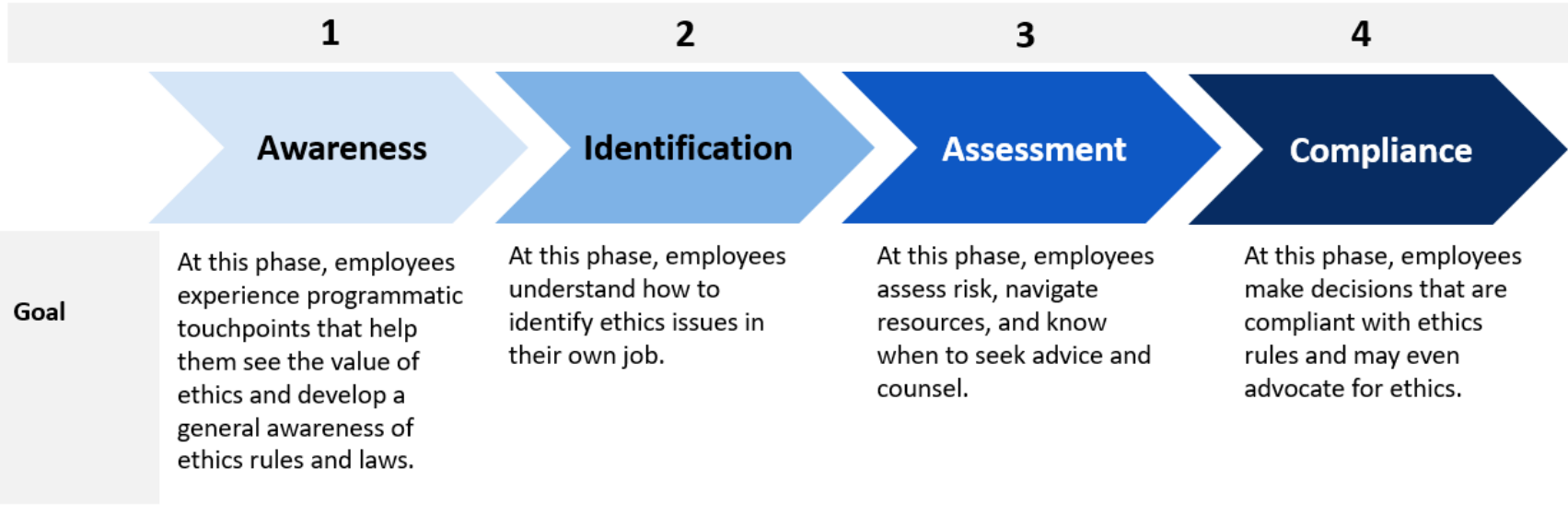


FOUR PHASES THAT LEAD TO ETHICS COMPLIANCE



Leading a Culture of Ethics: Communication Touchpoints for Senior Leaders, Supervisors, & Managers

TYPE	LEADER	AGENCY ACTION
PHASE 1: AWARENESS At this phase, employees experience programmatic touchpoints that help them see the value of ethics and develop a general awareness of ethics rules and laws.	Senior Leaders	Ethics as a Core Value: A Senior Leader sends a message to all employees announcing ethics as a core value. Core values are publicly listed on agency websites and employees are encouraged to learn and carry out their mission with the agency's core values in mind.
	New Senior Leaders	Incoming Leader Ethics Message: Soon after entering the agency, the incoming Senior Leader records a video message or sends a formal email to employees to affirm their personal commitment to act with integrity and reminds employees to continue to make ethics a priority along with the agency's mission.
	All Leaders	Routine Access to Staff Meetings: Managers and Senior Leaders provide routine access to ethics staff to allow for more microlearning opportunities to promote ethics awareness. Information is either distributed or ethics officials deliver customized messages tailored to ethics risks unique to the staff.
	Senior Leaders	Formal Initiative to Promote Ethics as a Priority: A Senior Leader announces a formal ethics awareness initiative to enhance and promote an ethical culture by clarifying the roles and responsibilities of all employees and leaders. Employees are formally asked to participate in a series of actions and the initiatives are usually publicly announced.
	Supervisors	Resources for New Employees: Supervisors actively promote ethics awareness by connecting new employees with relevant resources at the time they are assigned new projects, specialized tasks with increased risk, and throughout their first year as needed.
	Supervisors	Supervisory Training Related to Issue Spotting: Supervisors receive specialized training on how to spot and assess potential ethics issues, how to resolve potential risks, and when to refer issues to ethics staff.

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<p>PHASE 2: IDENTIFICATION</p> <p>At this phase, employees understand how to identify ethics issues in their own job.</p>	Supervisors	<p>Compliance Checklists: Supervisors distribute a compliance checklist to employees which clarifies how certain ethics rules apply to a specialized task and help employees more accurately identify risks that require further review. Supervisors are asked to routinely distribute before assigning specialized tasks to increase compliance. Example: Distributing a compliance checklist in advance of a grant selection meeting.</p>
	Senior Leaders	<p>Routine Review of Senior Leader Events: Senior Leaders provide Ethics Officials with access to information about upcoming appearances and events. Ethics officials screen appearances and assess potential ethics issues in advance of confirming attendance.</p>
	Senior Leaders	<p>Routine Access to Ethics Officials: Ethics Officials schedule a regular briefing with Senior Leaders at their staff meetings and offer to make presentations on a regular basis. They brief leadership on emerging ethics issues or trends identified through ethics counseling. These opportunities increase ethics knowledge and more frequently provide Senior Leaders with agency trends, stories, and facts that lead up to the identification of ethics issues.</p>
<p>PHASE 3: ASSESSMENT</p> <p>At this phase, employees assess risk, navigate resources, and know when to seek advice and counsel.</p>	All Leaders	<p>Written Communication Encouraging Advice & Counsel: Ethics officials publish a quarterly ethics newsletter or integrate written messages into routine agency memos (regularly promoted by leaders) covering timely ethics topics or a clever advice column along with ethics official contact information. This is especially useful during periods where employees are more frequently at risk to run into ethics issues such as during the holidays. When promoted by leaders, ethics officials have found these opportunities increase employee requests for advice and counsel.</p>
	Supervisors	<p>Distribution of an Ethics Assessment Job Aid: Supervisors distribute a job aid to help employees assess an identified ethics issue. The job aid uses a step-by-step framework to help employees determine how to assess risk and determine when it is necessary to refer them to Ethics Officials.</p>
	All Leaders	<p>Promote Solutions: Ethics Officials identify opportunities to tell solution-focused ethics stories. By frequently promoting stories that demonstrate how employees resolve and prevent ethics issues</p>

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		(instead of examples focused primarily on violations), employees are influenced to take on a solution-focused approach due to increased exposure to best practices and preventative measures.
	Supervisors	Ethics Determinations Made by Supervisors: Supervisors are formally delegated and trained to make certain ethics determinations, and communicate with subordinates to explain requirements and approvals, such as the approval of outside activity requests.
PHASE 4: COMPLIANCE At this phase, employees make decisions that are compliant with ethics rules and may even advocate for ethics.	Supervisors	Encourage Ethics as a Priority: Supervisors encourage employees to allocate time to complete ethics training and financial disclosure obligations. Employees face competing demands for their time and attention. The effort required to comply with some ethics laws can be misinterpreted as a hinderance to the agency's mission without cues from supervisors and support from leadership.
	All Leaders	Awards and Incentives Linked to Compliance: Leaders spotlight employees when they fulfill requirements early, serve as advocates, or make important contributions to enhance the promotion of ethics. Leaders also consider whether employees are complying with ethics rules as part of their decision to present an award, a promotion, or a bonus.
	All Leaders	Model Compliance: Leaders communicate the steps they have personally taken to ensure they are in full compliance with ethics laws or attend trainings alongside employees to show their commitment applies at every level. Examples of model compliance may include drafting a short email publicizing their timely filing of financial disclosure documents or early completion of ethics training
	Senior Leaders	Compliance Requests: Senior Leaders send out messages that require a call-to-action to increase employee responsiveness to compliance requests. Agencies have found this approach to be most effective for the completion of ethics training and financial disclosure requirements.
	Senior Leaders	Performance Appraisals: Agencies implement an ethics compliance component in the performance appraisal of SES or other senior level employees.