

Sample Seeking and Post Employment Risk Mitigation Practices

Policies and Procedures	Advice and Counsel	Communications	Training
Establish an agency-issued directive that requires senior officials to consult with the ethics office prior to seeking employment and encourages all employees to do so.	Review senior leaders' calendars regularly to identify potential ethics issues and provide ethics guidance as needed.	Highlight supervisory emphasis on ethics at all staff meetings and enlist frontline supervisors to communicate to their staffs the importance of getting advice as early as possible when seeking.	Develop and publish engaging, interactive seeking and post-employment training for annual ethics training.
Consider requiring a certification of no conflict statement that includes an explicit reference to seeking employment for employees assigned to procurement activities, investigations, inspections, examinations, audits, etc.	Maintain written ethics counseling files on a shared electronic drive, organized by topic and accessible to all ethics officials.	Send monthly or quarterly email ethics reminder/tips that include seeking- post employment guidance.	Collaborate with high risk program areas and non federal stakeholders to develop targeted and timely training and other strategic compliance communications that directly address the risks inherent in the work employees perform.
Consider requiring that key program leaders be informed of any seeking employment situations involving or affecting their program (e.g. COs, principal investigators, team leads, program managers, etc.)	Provide customized seeking and post-employment advisory opinions to all senior employees and other employees as requested.	Display posters/stickers with ethics counselors' phone numbers and the office hours available to employees especially during peak transition times.	Collaborate with HR to include seeking and post employment topics during onboarding, retirement planning and post-government counseling seminars and other training events.
Establish SOPs or another form of written procedures for post-employment counseling for departing employees.	Make general ethics guidance and ethics reference materials available to employees on the internal intranet systems/ agency webpage.	Maintain contact information of filers and send a one-year follow-up letter reminding departing employees of post-employment restrictions that they are still subject to.	Identify other agency specific cyclical training opportunities during peak transition periods.