0:03

welcome to roles for supervisors in

0:06

confidential financial disclosure my

0:08

name is Patrick Sheppard and I'm Cheryl

0:10

cane Piasecki in this session we hope to

0:13

share with you some tips for reviewing

0:16

confidential financial disclosure

0:17

reports as an intermediate reviewer one

0:20

brief administrative announcement on the

0:24

course page where you're viewing this

0:25

presentation two sections down you can

0:28

find these slides in PDF form you can

0:30

print those out and take notes or refer

0:32

to them later also this presentation

0:34

will be available as a recording

0:36

immediately upon the conclusion of the

0:38

broadcast so we have a lot to cover so

0:40

let's get started so Cheryl why do we do

0:46

financial disclosure well contrary to

0:50

what I'm sure many of your employees

0:52

actually believe confidential financial

0:54

disclosure isn't a paperwork exercise

0:57

there's actually a very real substantive

1:00

reason why we ask people to disclose the

1:03

information that we ask them to disclose

1:04

and why we conduct a review of the

1:07

information that they provide to us and

1:10

really I think it's important if you are

1:12

an intermediate reviewer that you do

1:15

understand what the certification

1:17

statement is that is signed by reviewers

1:19

of the ogee form 450 because this is

1:21

precisely why we why we have the

1:24

confidential financial closure system

1:26

which is that the filer is in compliance

1:29

with applicable laws and regulations now

1:32

there is a full body of laws and

1:35

regulations to which the employee is

1:37

subject the file or subject but the

1:40

primary role that we ask intermediate

1:42

reviewers and supervisors in particular

1:44

to perform for us is a conflicts of

1:47

interest analysis because effectively

1:49

what we're trying to do is prevent

1:51

conflicts of interest so what we seek

1:53

from supervisors is that you can bring

1:55

the knowledge that you have to the table

1:57

of what an employee works on so that you

1:59

can help identify potential conflicts of

2:01

interest and when we talk about conflict

2:04

of interest Patrick's going to tell us

2:05

here in a second what it is but we want

2:06

you to think about it broadly defined we

2:09

want you to see your role as flagging

2:11

potential conflicts of interest not

2:13

necessarily making

2:15

Eagle determination about whether or not

2:16

someone has violated law or regulation

2:18

so Patrick what is a conflict of

2:21

interest for purposes what we're going

2:23

to be asking supervisors and

2:24

intermediate reviewers to do for us well

2:26

in the simplest terms a conflict of

2:27

interest is anytime you have an overlap

2:30

between someone's government work and

2:32

their financial holdings or other

2:34

financial interest so where we see a

2:37

nexus or a confluence between the work

2:39

that someone does for the government and

2:41

those financial entanglements or assets

2:44

or sources being come outside of the

2:46

government anytime there's a nexus

2:48

between those two things that's a

2:50

potential conflict of interest and

2:51

that's precisely what we're looking for

2:53

so what why is that important like what

2:57

is the importance of being able to

2:59

determine whether or not someone has the

3:01

potential for a conflict of interest

3:02

conflicts of interest can harm our work

3:05

our agencies work our missions in a

3:07

myriad of ways for one they can

3:09

introduce bias and this may not be

3:11

conscious bias I can be subtle bias but

3:15

that bias can harm the ability of

3:17

employees to make decisions and

3:19

governments to carry out its function

3:20

I can harm or work in some ways because

3:23

if bias is introduced to the

3:25

decision-making process we can't be

3:27

certain that our work is being informed

3:29

by the public's interest and not being

3:30

polluted by some private pecuniary

3:32

interest it can also result in adverse

3:35

actions so we can have challenges or

3:38

investigations that result from actual

3:41

conflicts of interest for example in a

3:43

procurement if we introduce bias into

3:45

the process there could be a bid protest

3:47

in other kinds of work there may be

3:50

congressional investigations or IG

3:52

investigations to find out if the

3:54

decision-making process is broken

3:55

those are harmful to our work they're a

3:57

distraction and there are there things

4:00

that we want to avoid and perhaps most

4:03

importantly is we are dealing with the

4:05

criminal law so some forms of financial

4:08

conflict of interest are indeed crimes

4:09

and we certainly don't want our

4:11

employees to be exposed to criminal

4:13

liability for work they're doing for the

4:15

government so we have the financial

4:17

disclosure system in place to prevent

4:19

these problems to identify them before

4:20

they occur and take steps to avoid them

4:22

and I think that one of the highlights

4:24

here for for our reviewers is to

4:27

understand that really the

4:28

is about protecting the programs and

4:30

operations of the government we're

4:32

trying to protect the work of the

4:34

government yes we want to make sure that

4:36

employees themselves are not you know

4:38

committing crimes but overarching our

4:41

overarching goal is to protect the

4:43

integrity of the programs and operations

4:45

over which you know you have cognizance

4:48

absolutely in the supervisors you know

4:50

that's one of our priorities so we want

4:51

to empower you to protect your programs

4:53

from conflicts so what what do what do

4:58

folks need to know in order to to

5:00

prevent conflicts of interest what are

5:01

the pieces of information that they're

5:02

gonna bring to the table to make a

5:04

determination about this so it's we're

5:05

looking for that Nexus that nexus

5:09

between the employees duties and their

5:11

financial holdings we need those two

5:13

pieces of information we need to do know

5:15

what it is that the employee does it

5:17

work

5:17

and we need to know what their financial

5:20

holdings and business relationships are

5:21

so that's where you come in as a

5:24

supervisor or other intermediate

5:25

reviewer you know better than anyone in

5:27

the ethics office what your employees

5:29

are up to day to day what they may be

5:30

assigned to in the coming months and

5:32

years so we are asking you to bring that

5:35

piece of information to the review

5:37

process and the form itself the ogee

5:40

form 450 is the source of information

5:42

about the financial holdings and

5:44

business relationships of your employees

5:46

and with those two pieces of information

5:48

we hope that you will be able to help us

5:50

identify where there are potential for

5:52

conflicts so Cheryl who files a new G

6:00

form for 50 what how do we decide who

6:04

needs to complete this report well as an

6:06

initial matter it's important to

6:08

distinguish them from public filers and

6:10

in order to do that by regulation anyone

6:13

who files an ogee form 450 is going to

6:15

be a gs-15 or equivalent or below but

6:20

more importantly what we're looking for

6:22

with that what the what the confidential

6:25

financial closure filer is is a person

6:28

who has responsibilities or duties that

6:31

can actually affect the non-federal

6:34

entities so what you're doing is a risk

6:36

analysis as you are trying to determine

6:38

and that as supervisors have a really

6:39

critical role in helping the ethics

6:41

office to identify

6:42

who should be a 450 filer because it is

6:45

very much a matter of who among your

6:47

employees have responsibilities that and

6:51

duties that will affect non-federal

6:53

entities because they are the people who

6:55

by definition are going to be most

6:57

likely to have a potential for conflict

6:59

of interest because they have duties

7:01

that can that can affect the financial

7:04

interests of non-federal entities and

7:06

each agency is responsible for

7:08

determining who their 450 filers are

7:10

they are not determined by statute or

7:13

regulation each agency makes a

7:16

determination about which of their

7:18

employees fall within the ambit of a 450

7:22

filer and OGE has has created a job aid

7:28

to assist ethics officials and to assist

7:31

you as a supervisor if you are asked by

7:33

the ethics shop to assist them in

7:36

identifying who should legitimately file

7:39

an ogee form 450 and this is a checklist

7:44

effectively that helps you understand

7:47

what what sorts of criteria you might

7:50

want to consider in determining whether

7:51

or not someone likely should be

7:53

considered an ogee 450 filer and when

7:58

you're doing this we're not gonna we

7:59

would suggest to you that that you look

8:02

at it from the standpoint of is it

8:04

somebody who needs to file is it someone

8:06

who doesn't need to file and in certain

8:08

situations where you're not sure if

8:10

you're using the checklist and somebody

8:11

does it you're not sure if somebody

8:12

legitimately files within or outside

8:16

that you take it to the ethic shop you

8:18

don't automatically lump them into

8:20

filers and you don't automatically you

8:22

know exclude them as filers but that you

8:24

do your level best to decide yeah these

8:25

people seem to legitimately meet the

8:28

criteria as those are laid out in the

8:30

checklist or know these pieces these are

8:32

folks who clearly don't meet any of the

8:35

criteria and this checklist and when you

8:37

have a question to go to your ethics

8:39

shop and let them help you make a

8:41

decision about whether or not someone

8:43

who might be on the border it should be

8:45

included in the filing population or not

8:47

when I worked in an agency we asked our

8:49

supervisors to make three lists

8:52

yes list no list and on am not shortlist

8:55

and we found that in some cases when we

8:58

were doing this for the first time that

8:59

the the not sure list was quite long and

9:01

I was happy as an ethics official to

9:03

help them work through that process

9:04

because having people file unnecessarily

9:07

as a waste of your time it's waste of

9:08

their time and it's a waste of the

9:10

agency's resources so we want to make

9:11

sure we're being precise in these

9:12

determinations now in deterrent turn in

9:15

in terms of what actually gets filed I

9:17

think in the majority of situations it's

9:20

the ogee form 450 that most agencies use

9:25

with respect to their confidential

9:26

financials close your filers and there

9:27

is a new version this year a 2019

9:29

version so I'm going to put a plug in

9:30

right now to make sure this year when

9:32

people are filing make sure they're

9:33

using the 2019 version because it can it

9:35

contains some substantive changes that

9:38

were that were made to the regulation

9:41

and so prior versions shouldn't be used

9:44

but some of you may have alternative

9:46

reporting formats or alternative

9:48

disclosure systems and so you you might

9:51

have a form that is different from the

9:53

OGE form for 50 in a moment Patrick and

9:55

I are gonna walk you through and a

9:57

sample of an OG form for 50 and how you

9:59

might go about reviewing that but I

10:01

would also encourage you if you as a

10:04

supervisor honestly believe that the og

10:06

form 450 is not a good fit for the kinds

10:09

of conflicts or the kinds of things that

10:11

could create a conflict for your

10:12

employees you should discuss with the

10:15

ethics office whether or not your agency

10:18

might want to consider creating an

10:19

alternative form or creating an

10:21

alternative system for your fire or for

10:25

your employees that could better protect

10:28

your programs and operations from

10:30

potential conflicts of interest I think

10:32

that's an important point that this

10:34

program is for the protection of

10:36

agencies so there's a lot of flexibility

10:38

and as leaders in your organization we

10:41

want you to work with the the ethics

10:43

office to use that flexibility where

10:44

necessary so what's the process for

10:48

review Patrick what's kind of the quick

10:49

and dirty that we can tell people about

10:51

how to go this review this review

10:52

process so I think it's a two-step

10:54

process we need to look at the duties of

10:57

the employees who we oversee and look at

11:00

their interests and find out if there is

11:02

a nexus or a confluence or potential

11:04

those duties to affect the financial

11:06

interest and again here I'd encourage

11:08

you to use that Yes No maybe format as

11:11

he are going through the report we have

11:12

to certify that they're in compliance

11:13

with all laws and regulations so for

11:16

each asset we need to determine whether

11:19

yes it's a conflict no it's not going to

11:21

pose a potential conflict and if there

11:23

are things that we can't do that for we

11:25

need to do some work to make sure that

11:26

we can get to a resolution so as you

11:28

review these reports I would encourage

11:30

you to look for look at each entry and

11:32

say either no there's no possibility of

11:35

a nexus between the work and this entry

11:38

or this is definitely a situation where

11:41

we have a nexus and then we need to

11:43

notify the ethics office so that we can

11:45

take care of that or if we're not sure

11:46

make the ethics office aware so that we

11:48

can dig into it a little more and make

11:50

sure we come to a resolution I also like

11:54

to point out to folks that I think when

11:56

people think about what they're

11:57

anticipating seeing when the financial

11:59

schools reform they think of stocks and

12:00

mutual funds and business and income but

12:04

it's also a place where your employees

12:06

are going to be disclosing outside

12:07

activities for those of you who are

12:10

agencies that have a prior approval

12:12

requirement for outside activities this

12:14

is a way first as a supervisor or

12:16

intermediate reviewer this is you can be

12:18

another set of eyes for the ethics

12:20

office it you can use this as an

12:22

opportunity if somebody is disclosing an

12:24

outside activity and you're not sure

12:26

whether or not they've gotten prior

12:27

approval that you can call your

12:28

employees attention to it and make sure

12:30

that they've gotten prior approval for

12:31

anything that they include as an outside

12:34

activity and then you also then need to

12:38

do a conflict analysis much as you do

12:40

the same conflicts analysis on on assets

12:42

and other forms of income when you're

12:45

looking at an outside activity you're

12:46

going to want to bring the same

12:47

sensibility to it which does the

12:50

organization that this person has this

12:52

relationship with is it something that

12:54

could create a potential conflict of

12:55

interest with you with the employees

12:57

duties does it present clearly no

13:00

conflict of interest or do I have

13:02

questions about whether or not this is

13:03

an entity that either comes before us or

13:05

could be affected by the work that we do

13:07

also there another question that we can

13:10

come up in the outside activity area is

13:12

is it an organization that may come

13:16

before other parts of the federal

13:18

governor

13:18

because that could also predict present

13:20

a different kind of conflict of interest

13:21

but and we're going to talk about that a

13:23

little bit more when we get into the

13:25

actual example of a 4:50 filing so let's

13:31

turn to the 4:50 and we what we've done

13:33

is we've given you a screenshot here of

13:35

a filled out form for 50 we want to sort

13:39

of highlight for you things to look for

13:41

kind of where to put your eyes when

13:43

these forms come in front of you and

13:46

when you get a form for 50 we would ask

13:48

you to take a look obviously at the

13:51

position and title of the the person

13:54

whose form you're looking at and you

13:55

really should look at that first because

13:56

that's what we want you to do is we want

13:58

you to have in your mind before you

14:00

begin looking at any other aspect of the

14:02

form what are the duties and

14:04

responsibilities of this position given

14:07

what this employee does what are the

14:09

types of things that if I were to see

14:11

them would cause me some concern so once

14:14

you've had a chance to look at the title

14:15

in position then we'd ask you to take a

14:17

look at the next section down there that

14:20

I have highlighted this is where the

14:22

employee is going to indicate whether or

14:23

not they have actually had things to

14:25

disclose in the various parts of the

14:28

form and again this is a place where you

14:30

can be of some help to ethics officials

14:32

because any place where they say yes

14:34

where they've marked a yes box you

14:37

should expect to see things having been

14:39

disclosed on that part any place where

14:42

they've said no you should not see

14:44

anything disclosed on that part of the

14:46

form if you think of or if you've seen

14:49

if you see that an employee has

14:50

basically filled out this part

14:53

incorrectly eg they said there was

14:55

something they needed to disclose and

14:57

there was nothing on the part that they

14:58

said they had something to disclose its

15:00

best to flag that early because you are

15:03

gonna have to go back to the file or you

15:04

or the ethics shop is gonna have to go

15:06

back to the filer and ask for that

15:07

information so in order to save

15:09

everybody time so that you're not having

15:11

to look at something two and three times

15:12

to the extent that you could flag those

15:14

kinds of things in advance for the

15:15

ethics office that would be terrific

15:18

likewise just a few things if you were

15:20

the first person to receive the report

15:22

if your filers send their reports to you

15:25

first before they go to the ethics

15:26

office then you would be the one who

15:28

would be responsible for putting the

15:30

date received by the agency

15:32

in the box so that a your filer can get

15:35

credit for having filed it on time and B

15:38

to let you know there is a 60-day review

15:41

limit that that 60-day review starts to

15:45

toll upon the date that the agency

15:48

receives the form from the filer so

15:51

again it's just just sort of a reminder

15:52

to you that because you have in an

15:54

integral role in reviewing these forms

15:58

your part in making sure that that's

16:00

completed within the 60 days to the

16:02

greatest extent possible is much

16:04

appreciated by the ethics office and and

16:09

so we would just encourage you to make

16:11

sure that that to the extent that you

16:13

have those responsibilities that you are

16:15

aware of what those responsibilities are

16:17

and so let's talk a little bit about

16:19

what actually appears on the report so

16:22

we're gonna start with part one because

16:24

it comes first

16:25

and some of the things that we can

16:27

expect to see on part one are financial

16:29

holdings of our employees and source of

16:31

income so those might be securities in

16:33

the form of stock they may be mutual

16:36

funds or exchange-traded funds they

16:38

could be current or prior non federal

16:40

employment if this is a new employee or

16:43

they have concurrent employment their

16:45

spouses employment if they have a spouse

16:46

and he or she is employed and any

16:49

outside business or earned income so

16:51

really we're looking at assets and

16:52

sources of income for the filer spouse

16:54

and dependent children so let's take a

16:58

look at how this might appear on a form

17:00

here we have a sample of part 1 for our

17:03

food safety inspector and our filer has

17:07

indicated that there are four holdings

17:10

for entries on the form and again what

17:12

we want to do is use the same framework

17:14

the Yes No maybe framework and

17:16

considering the duties of this position

17:18

someone who's involved in the regulation

17:20

of food safety we can look at this first

17:23

entry Walmart and we know that Walmart

17:25

is a vendor of groceries and foodstuffs

17:29

so maybe there's a possibility for a

17:31

nexus between this employees duties and

17:33

this holding we don't know if this is a

17:35

stock holding and employment holding but

17:38

it really doesn't matter we're just

17:39

looking for that nexus between the two

17:41

so if we're not sure we'd want to make a

17:43

note of that for the ethics office say

17:44

you know

17:45

want to look into this make sure there's

17:46

not a problem next we have the iShares

17:49

US financial services ETF so this is an

17:52

exchange-traded fund comprised of

17:54

financial services companies given what

17:56

we know about the filer that our filer

17:58

is involved in overseeing food safety

18:02

there's unlikely to be a nexus so we may

18:04

be able to say that there's no no no

18:05

nexus yet there's no potential conflict

18:07

we can indicate that to the ethics

18:09

office third we have Tyson food which is

18:13

a food provider and we may know that oh

18:15

wait let's stop this is definitely a

18:18

nexus with the work we do at the agency

18:20

and maybe specifically with the work

18:21

this employee does we need to flag that

18:24

we need to let someone know so we could

18:26

indicate that on on the form and make

18:28

sure that the ethics office is notified

18:30

of that and finally we have the dough

18:32

family farm which is a little unusual we

18:35

are not sure if this is an outside

18:36

position we're not sure what kind of

18:38

form it is what they produce whether

18:39

they produce food for human consumption

18:41

so this may be another question mark

18:43

that we want to chase down before we

18:45

certify the report so the way we might

18:48

do that is something like this not sure

18:50

no conflict conflict definitely need to

18:53

do something and again not sure so again

18:56

we want to use the yes/no maybe

18:57

framework so on the on the on the cover

19:05

page that we that we just were looking

19:08

at a moment ago the filer indicated that

19:09

they didn't have any liabilities but

19:11

they did indicate that they had some

19:13

part three entries and that's typically

19:15

what you're gonna see I think on most

19:16

450s is that people may not have

19:18

liabilities but part one and part three

19:20

are commonly filled out so for part

19:23

three this is where we're looking at

19:24

outside activities and what we've

19:26

mentioned earlier and filers are the

19:29

only the the filer only has to report

19:31

things for themselves on this part of

19:33

the forum and so common things that you

19:35

will see there is if the if the if the

19:38

filer had a prior employment position

19:41

that you may see their prior employer

19:44

identified if they have any current

19:46

outside employment which could include

19:49

consulting it could include an employee

19:51

owned business we would expect to see

19:54

that on an outside activity

19:58

listing and others certain outside

20:01

activities where maybe the employee is

20:04

not an employee of an outside

20:07

organization or does not necessarily

20:10

derive any income from an outside

20:12

activity but they serve for in for

20:15

instance in as an officer or on the

20:17

board of directors or as a trustee we

20:21

would expect to see those types of

20:23

outside activities included on this part

20:25

of the form as well now what should not

20:27

be here are any positions that the

20:29

employee might hold that are that are

20:31

done as part of their official duties

20:33

we're only looking for things for

20:35

outside activities and outside positions

20:37

that the employee would hold in a

20:39

personal capacity in a non official

20:42

government capacity so if we look at our

20:45

our filers outside positions what

20:50

they've disclosed you'll see that the

20:52

dough family farm is listed as a family

20:55

business and the employee indicates that

20:57

they actually do hold a position with

20:59

that with that farm so the other part of

21:02

part three that is helpful as it gives

21:04

you a fuller picture of some things that

21:06

you may have seen on part one so here we

21:08

can see that they as I said the filer

21:10

has a position as treasurer now what

21:13

what you're going to do here with

21:14

anything you see on part three is very

21:16

similar to what we would ask you to do

21:18

on part one which is basically to decide

21:21

does the organization that's being

21:24

listed here is it is it an organization

21:26

a that could be affected by the work

21:29

that our government employee does be is

21:33

it an organization that may very well

21:35

come before our agency and see is it a

21:41

position is does the employee hold a

21:43

position where they might be likely to

21:45

be making communications to other

21:47

government agencies so those are sort of

21:50

the three aspects that we would be

21:51

looking at with any kind of outside

21:53

position that is listed which is again a

21:56

can it be affected can it can kind of be

21:59

affected by the performance of the

22:00

government of the employees duties is it

22:03

likely that the organization would be

22:04

one that would come before our agency

22:07

and or is it a position where the

22:11

employee might be making

22:12

to other government entities and with

22:16

doe family farm we have a question mark

22:19

about whether or not the farm itself

22:21

well would present a potential conflict

22:22

of interest for the employee and again

22:26

we don't know for certain whether or not

22:27

as treasurer of the farm whether or not

22:30

the farm maybe seeks government

22:32

subsidies or whether the the farm seeks

22:34

things from other government agencies so

22:36

that would be a question mark and

22:37

something to flag for the ethics office

22:39

to take a look at and without side

22:42

positions typically these do result in a

22:44

need for counseling so in most cases

22:47

employees will need to receive advice

22:48

from the ethics office about their

22:50

outside activities okay so Patrick sure

22:54

so part four is where we see agreements

22:57

in a grant range meant so these may be

23:00

retirement or other benefits that are

23:02

residual from employment before someone

23:05

joined the federal government it may be

23:06

arrangements or agreements for

23:08

employment in the future

23:09

and it may also include leaves of

23:12

absence or similar arrangements with a

23:14

previous employer and again here we're

23:16

doing a similar exercise we want to

23:20

determine whether or not there is a

23:23

nexus between any entries listed on part

23:25

four and the duties of the position the

23:28

work of our agency or make

23:30

representations before the government so

23:32

here we have the farm again it says that

23:35

they will continue to receive payment

23:37

for services as treasurer of the family

23:39

farm so again the question we ask is is

23:41

there would the farm come before this

23:44

employee does the farm have business or

23:46

otherwise appear before our agency or

23:48

what our employee is the treasurer be

23:50

asked to make a representation to any

23:52

part of the government and if the answer

23:54

to any of those questions is yes we want

23:56

to make sure that an ethics official

23:57

takes another look at it so what do we

24:02

do if we find a potential conflict of

24:04

interest so the first two we need to do

24:06

immediately which is contact the ethics

24:08

office and ask the employee to stop

24:10

working on anything that might pose a

24:11

conflict so if you see an entry and you

24:13

say oh this employee has been assigned

24:16

to something that may affect that entity

24:17

ask them to stop until they can receive

24:19

advice and to let the ethics office know

24:21

and then after you have done those two

24:24

things the ethics officer

24:26

the the attorney or ethics official

24:28

who's working on the report will work

24:30

with you and the employee to come up

24:31

with a resolution this may involve

24:34

selling potentially conflicting holding

24:36

resigning from a conflicting position

24:38

there may be a regulatory provision that

24:40

allows them to continue to participate

24:42

or we may have to reassign the employee

24:44

to different work but you'll have to

24:46

work together to come up with that

24:47

solution and again we want to do that as

24:49

soon as possible because our goal is to

24:51

prevent conflicts of interest and I

24:53

think the important thing here is to

24:54

remember that you're not being asked to

24:57

resolve anything that you find you're

24:58

being asked to flag any potential

25:01

problem that you see and so let's - let

25:04

the ethics office know as soon as you

25:06

have have you know spotted anything that

25:08

you think could be potentially

25:09

problematic so how else as supervisors

25:14

can we help prevent conflicts of

25:16

interest well for 50 review confidential

25:19

review is an annual occurrence but there

25:21

are things we can do throughout the year

25:22

to protect the work of our agencies one

25:25

we can think about conflicts when we're

25:27

assigning work to employees think about

25:29

whether there's potential for conflict

25:30

we can notify the ethics office when

25:33

there are promotions changes and rolls

25:35

or transfers between jobs

25:37

the ethics official who reviews this

25:39

report is going to assume that person

25:41

persists in that position but if they

25:43

have new duties the potential for

25:44

conflict changes so letting someone know

25:47

about that so you can take another look

25:48

is something that can really help

25:50

protect your your agency and its

25:51

programs we can also remind employees

25:54

that they should avoid conflicts when

25:57

starting new work so if they're assigned

25:59

to something and I think there may be a

26:00

conflict they should seek advice they

26:02

may be acquiring new assets throughout

26:04

the year they should think about

26:05

conflicts as they do that and seek

26:07

advice where necessary and if they're

26:09

engaging in non-federal employments also

26:11

their spouse is changing jobs change

26:13

their conflict situation so they may

26:15

need to seek advice to avoid conflicts

26:18

and reminding people periodically can

26:19

help them to do so another thing that

26:22

you can do as a supervisor is to tell

26:24

the ethics office when you're thinking

26:25

about hiring we find that in many cases

26:28

the most urgent problems with conflicts

26:30

of interest come as people are entering

26:32

government service from a non-government

26:34

employer and if we don't deal with those

26:37

problems timely they can

26:39

become real problems rather than mere

26:40

potential conflicts so involving the

26:42

ethics office as soon as possible helps

26:44

us to avoid those so we hope you'll keep

26:46

this in mind as we move through the year

26:48

and we thank you for your cooperation in

26:51

in this important work and hope that we

26:53

have helped you to do that more

26:55

efficiently and more effectively

English (auto-generated)