

# **An Introduction to the Executive Branch Ethics Program**

## **Helping HR professionals understand the rules and manage risk**

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**Employee and Labor Relations Roundtable**  
**U.S. Office of Personnel Management**



# OGE Mission: Prevent Conflicts of Interest

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



Preventing Conflicts of Interest  
in the Executive Branch

# Quick

# Facts

**4 million**

Executive Branch Employees

**133**

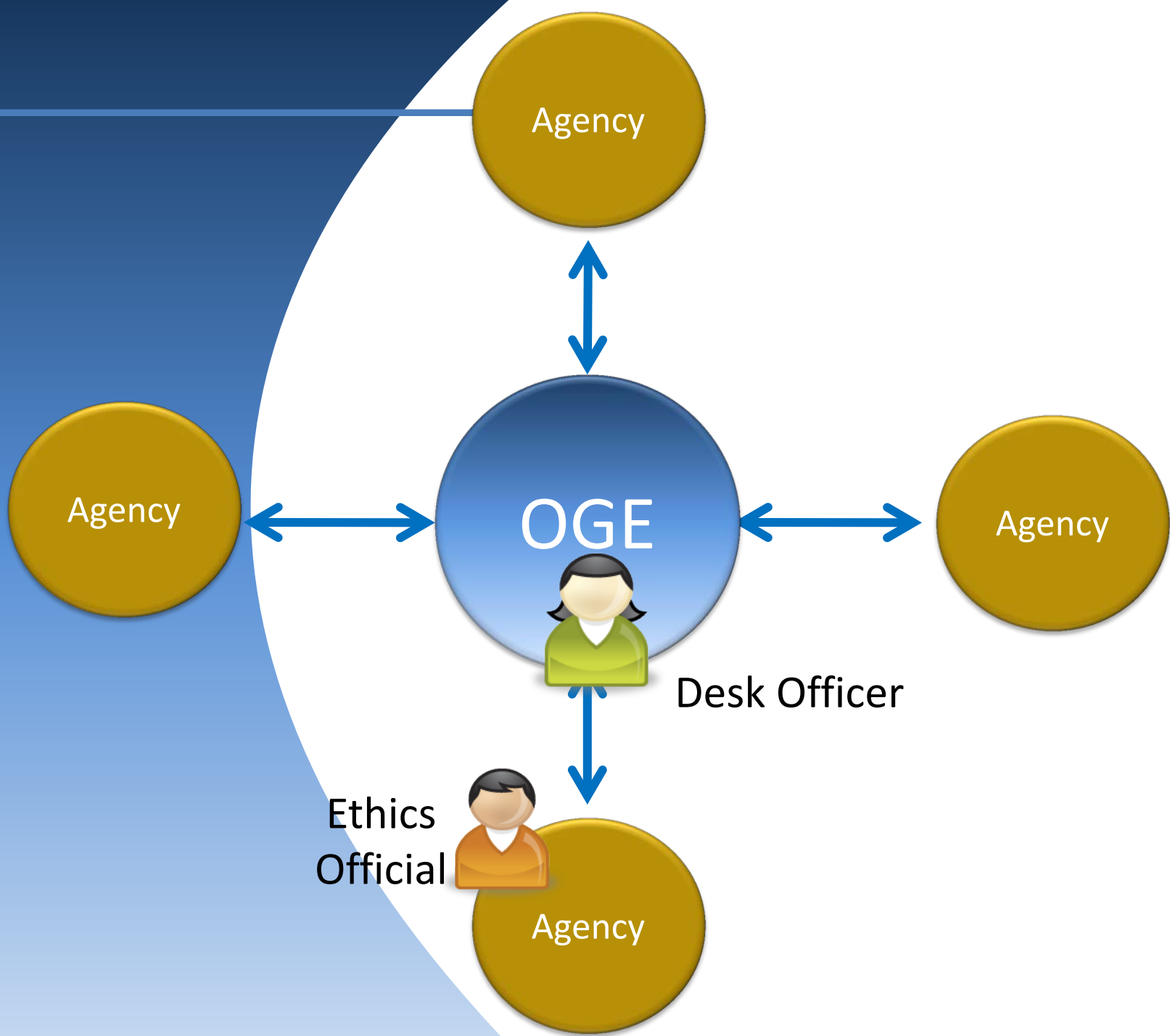
Agencies

**5,700**

Ethics Officials

**80**

Employees in OGE



# ETHICS PROGRAM ELEMENTS



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# Advice and Counseling

# Criminal Conflicts

**18 USC 201** Bribery

**18 USC 203 & 205** Representation

**18 USC 207** Post-Employment

**18 USC 208** Financial Interests

**18 USC 209** Supplemented Salary

# Standards of Conduct

5 CFR 2635

- 100** Principles
- 200/300** Gifts
- 500** Impartiality
- 600** Seeking Employment
- 700** Misuse of Position
- 800** Outside Activities





Financial Disclosure



OGE 278

OGE 450

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# Handling Misconduct



# EXECUTIVE BRANCH

## Ethics Training

1.1 M

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# **Managing Organizational Risk**



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**What does Jason have to do  
with risk management?**

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# Context Matters<sup>1</sup>

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**What are the features of an  
at-risk organizational unit?**



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# Where do we find risk?

- Punitive decision making environment
- Geographic isolation
- Where work affects outside entities
- Infrequent oversight
- Isolation from preventative guidance/infrastructure

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# When do organizations face the most risk?

- Increases in workload
- Nearing deadlines
- Change in leadership
- Reorganization
- Reductions in force

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**How can we use this  
information to manage risk?**

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# Risk Management Strategies

- Periodic assessment
- Leveraging partnerships
- Strategic deployment of resources
- Timely interventions and training
  - Outreach to managers
  - Employee training
  - Ethics reminders
- “Game” response strategy<sup>2</sup>

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**Can we identify at-risk  
employees?**

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# A “Career Moments” Approach

Macro economic, market or production event that drives corporate and significant professional change.<sup>3</sup>

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# Risk Management Strategies

- Enlist managers
  - Practice interventions
  - Identify risk
  - Ask for help
- Allocate education resources strategically
- Provide timely support and resources

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**Create a risk management  
action plan.**



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# Summary

- OGE Mission
- Overview of the ethics rules
- Risk Management Strategies

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# Thank you!

If you have other questions, please  
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# Works Consulted

1. Kern MC, Chugh D.; Bounded ethicality: the perils of loss framing, 2009
2. Joseph W. Weiss; Ethics: A Stakeholder and Issues Management Approach, pg. 72, 2009
3. Corporate Executive Board; Maximizing Integrity at Key Career Moments *A Better, More Cost-Effective Approach to Compliance and Ethics Outreach*  
<https://www.executiveboard.com/blogs/maximizing-integrity-at-key-career-moments/>
4. Chana Joffe-Walt and Alix Spiegel; Psychology Of Fraud: *Why Good People Do Bad Things*, May 1, 2012  
<http://www.npr.org/2012/05/01/151764534/psychology-of-fraud-why-good-people-do-bad-things>