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Ethics Newsgram

Enforcement of Ethics Rules Through Disciplinary Actions

Editor's note: *Presentations on the enforcement of ethics rules through disciplinary actions were made at last year's Senior Ethics Officials' Training Course and U.S. Government Ethics Conference. This summary of the presentations is being provided through the* ***Government Ethics Newsgram*** *in response to suggestions from persons in attendance that the topic is one in which the entire ethics community would be interested.*

Introduction

An employee's violation of the Standards of Ethical Conduct or of an agency's supplemental standards of conduct may be cause for disciplinary action. Many of these disciplinary actions will be "adverse actions" that the employee can appeal to the Merit Systems Protection Board (MSPB), or that the employee can grieve under a negotiated grievance process in which the arbitrator who ultimately may decide the grievance is bound by MSPB precedents.

In a decision issued during its early years, the MSPB stated, "We have no doubt that the Government has a right and duty to govern the ethical conduct of its employees so as to ensure that they are in no way compromised in the performance of their duties." **Miller** v**. United States Postal Service**, 7 M.S.P.R. 572, 577 (1981), **affirmed**, 712 F.2d 1006 (6th Cir. 1983). [Note: "M.S.P.R." stands for the Merit Systems Protection Reporter, which is published by the West Publishing Company. It is the case reporter which the MSPB cites in its decisions.]

The MSPB has since decided several appeals that involve standards-of-conduct enforcement and related ethics issues. Some of the principles highlighted in the MSPB's decisions, and in Federal court decisions which arose from employee appeals, are discussed below.

Nexus to the Efficiency of the Service

For most employees, the sole criterion under which an appealable disciplinary action may be taken is that the action be "for such cause as will promote the efficiency of the service." 5 U.S.C. § 7513(a). In other words, there must be a connection (called a "nexus") between the proven grounds for the action and either an employee's ability to accomplish his duties or the agency's ability to carry out its mission.

So, for example, in **Krbec** v. **Department of Transportation**, 21 M.S.P.R. 239 (1984), **affirmed**, 770 F.2d 180 (Fed. Cir. 1985) (Table), there was a nexus between the efficiency of the service and the acceptance of food, travel, and lodging from a recipient of agency grants by an agency employee with responsibility for monitoring agency grants, because it reflected negatively on the agency and undermined agency confidence in the employee's integrity. In **Connett** v. **Department of Navy**, 31 M.S.P.R. 322 (1986), **affirmed**, 824 F.2d 978 (1987) (Table), there was a nexus between the efficiency of the service and an employee's falsification of his financial disclosure report because it was "inherently destructive of the agency's faith in [the] employee's trustworthiness and honesty, essential elements in the relationship of an employer and employee." In **McIntire** v. **Federal Emergency Management Agency**, 55 M.S.P.R. 578, 588 (1992), there was a nexus between the efficiency of the service and an employee's preferential

Continued on page 2 column 1

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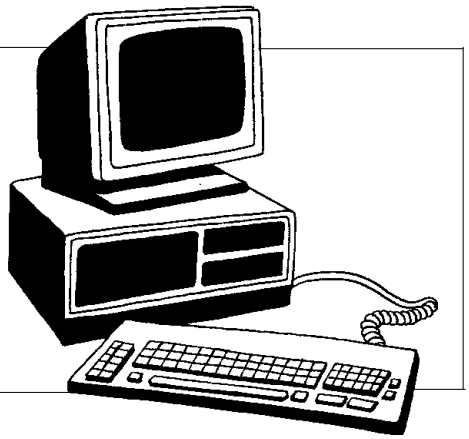
See page 6



Inside:

Enforcement continued from page 1

treatment of a subordinate employee because "it undermines the public and employee confidence in the integrity of Government officials." In **Cornish** v. **Department of Commerce**, 10 M.S.P.R. 382 (1982), there was a nexus between the efficiency of the service and an employee's failure to pay his just debts because of the time-consuming nature of the creditors' communications to the employee's supervisors and the resulting disruption in the work place.

Nexus can be found between the efficiency of the service and misconduct even though the employee's performance ratings were not affected by the misconduct. **Clark** v. **Equal Employment Opportunity Commission**, 42 M.S.P.R. 467, 475-76 (1989); **Schumacher** v. **United States Postal Service**, 52 M.S.P.R. 575, 579 (1992). In addition, at least in cases involving off-duty misconduct (such as prohibited outside employment), it is clear that agencies do not have to produce evidence explicitly demonstrating that the misconduct adversely impacts on the efficiency of the service. "[O]therwise, agencies would have to await actual impairment of service efficiency before taking action, which would be contrary to the public interest." **Schumacher**, **supra** at 52 M.S.P.R. 580.

A violation of ethical standards could be so egregious as to speak for itself and thereby create a rebuttable presumption of nexus between the offense and the adverse action. **Wynne** v. **United States**, 618 F.2d 121, 124 (Ct. Cl. 1979). In cases where the misconduct is such that there is a presumption of nexus, the burden of proof with respect to nexus would then shift from the agency to the employee.

"[T]here must be a connection...between the proven grounds for the action and either an employee's ability to accomplish his duties or the agency's ability to carry out its mission."]

In cases in which the efficiency of the service is the criterion for taking a disciplinary action, there is no requirement that an employee violate a specific written policy or regulation before the employee can be disciplined. **Fontes** v. **Department of Transportation**, 51 M.S.P.R. 655, 663 (1991). Indeed, an agency does not meet its burden of proof by merely asserting that an employee violated the standards of conduct, since agency charges and specifications do not constitute evidence. **Trachy** v. **Defense Communications Agency**, 18 M.S.P.R. 317, 323 (1983). "[M]ere charges without more are not sufficient to establish violation of the public trust." **Burnett** v. **Soldier's and Airmen's Home**, 13 M.S.P.R. 311, 314 (1982).

Standards of Conduct as a Means of Providing Notice that Conduct is Prohibited

As a result of an appeal, a penalty may be mitigated by the MSPB. Among the factors that the MSPB considers in evaluating the reasonableness of a penalty is "the clarity with which the employee was on notice of any rules that were violated in committing the offense, or had been warned about the conduct in question." **Douglas** v. **Veterans Administration**, 5 M.S.P.R. 280, 305 (1981). "The appropriateness of a particular penalty is a separate and distinct question from that of whether there is an adequate relationship or `nexus' between the grounds for an adverse action and `the efficiency of the service.' While the efficiency of the service is the ultimate criterion for determining both whether any disciplinary action is warranted and whether the particular penalty may be sustained, those determinations are quite distinct and must be separately considered." **Goode** v. **Defense Logistics Agency**, 31 M.S.P.R. 446, 449 (1986). In short, "lack of notice of a regulation alleged to be violated is more appropriately considered as a mitigating factor rather than a defense to the charge." **Faitel** v. **Veterans Administration**, 26 M.S.P.R. 465, 468-69 (1985).

Thus, although the MSPB has observed that "the standards of conduct are largely a matter of common sense and cover an area for which employees must be presumed to know the law," **Coons** v. **Department of Navy**, 15 M.S.P.R. 1, 4 (1983), the standards are very important as a means of providing notice to employees that certain types of conduct are prohibited. Notice or a warning was found to have been provided where the employee was given a handbook that listed a prohibition and was given training in conduct and ethics, **Reynolds** v. **Department of Agriculture**, 54 M.S.P.R. 111 (1992); where the employee was presented twice yearly with a copy of the standards of conduct, **Hedgecock** v. **Department of Army**, 20 M.S.P.R. 333 (1984); where the employee had reviewed the agency's standards of conduct five months before engaging in conduct that violated the standards, **Moore** v. **Department of Army**, 32 M.S.P.R. 277 (1987); and where the employee was advised that his conduct violated the standards of conduct, and was given an opportunity to stop engaging in the conduct, **Wild** v. **Department of Housing and Urban Development**, 692 F.2d 1129 (7th Cir. 1982); **Schumacher**, **supra** at 52 M.S.P.R. 581. In a related vein, while the lack of notice would not be a defense in cases involving the misuse of Government property because "[a]n agency is not required to prove intent to sustain a charge of unauthorized use of Government property," **Sternberg** v. **Department of Defense**, **Dependents Schools**, 52 M.S.P.R. 547, 558 (1992), a lack of notice would be pertinent to the assessment of a

Continued on page 3 column 1

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We welcome any news and information related to Government ethics which you might wish to bring to the attention of OGE and the executive agencies as well as your candid critiques and suggestions. Quoting or reprinting materials contained in this publication is strongly encouraged and may be done without seeking OGE permission.

The Director of the Office of Government Ethics has determined that the publication of this periodical is necessary to the transaction of the public business of OGE, as required by law.

Enforcement continued from page 2

penalty in such cases.

Conflict-of-Interest and Appearance Issues

An agency may charge an employee with having engaged in specific behavior that it characterizes as a "conflict of interest." In some cases, an employee's outside interest was found to be "so closely related to the duties imposed by his Federal employment" that on its face it gave rise to a prohibited conflict of interest. **Smith** v. **Department of Interior**, 6 M.S.P.R. 84, 87 (1981); **Deal** v. **Department of Justice**, 11 M.S.P.R. 370, 372 (1982). "To prove the existence of a conflict of interest, an agency must establish that its employee was acting in two separate capacities, at least one of which involved his official duties, and that the nature of his interests or duties in one capacity had a `direct and predictable effect' on his interest or duties in his other capacity." **Fontes**, **supra** at 51 M.S.P.R. 663. If an agency were to charge an employee with violating one of the conflict-of-interest statutes (e.g., 18 U.S.C. § 208), the agency would have to prove each of the elements of the violation of the statute. **Oddo** v. **Department of Treasury**, 13 M.S.P.R. 483, 486 (1982).

The MSPB has sustained removals based on the charge of creating an appearance of conflict of interest. **See, e.g., Lavelle** v. **Department of Air Force**, 9 M.S.P.R. 234 (1981). "Creating the appearance of a conflict of interest constitutes a serious breach of trust. The Government clearly has an interest in prohibiting such conduct, and in ensuring that its agents and employees are not compromised in the performance of their duties as a result of any outside influences." **Coons, supra** at 15 M.S.P.R. 5 (1983). Conduct which involves no actual violation of the standards of conduct may nonetheless create an appearance of such wrongdoing. **Burnett**, **supra** at 13 M.S.P.R. 315. However, proof of an appearance of a conflict of interest is insufficient where the agency charges the employee with an actual conflict of interest. **Fontes**, **supra** at 51 M.S.P.R. 664; **Lane** v. **Department of Army**, 19 M.S.P.R. 161, 162 (1989).

Ethics News Briefs

Bank Account Reporting on SF 450 Eliminated

On November 30, 1993, OGE promulgated a final rule amendment to 5 C.F.R part 2634, the executive branch financial disclosure regulation. This amendment, effective November 30, removed the regulatory requirement that confidential SF 450 filers report assets or income related to cash accounts in depository institutions, money market mutual funds/accounts, and U.S. Government obligations/securities. This change does not affect public SF 278 filers who are required under the Ethics in Government Act and the financial disclosure regulation to report such items. Individual agencies that still need reporting of such items by confidential filers can ask for OGE approval to continue to collect the data.

OGE issued a proposed amendment to this effect last September. See "Ethics News Briefs," **Government Ethics Newsgram**, Vol. 10, No. 2 (Fall 1993). Favorable public comment was received on the proposed amendment. Therefore, the final amendment adopted the revision as proposed with one technical clarification. See 58 Federal Register 63023-63024 (November 30, 1993).

Foreign Gifts "Minimal Value" Adjusted

After consultation with the Department of State, the General Services Administration (GSA) has raised the "minimal value" ceiling under the Foreign Gifts and Decorations Act for gifts from foreign governments to no more than $225 (the prior ceiling was $200). See 58 Federal Register 46088-46089 (September 1, 1993).

The new value, which GSA made retroactively effective to January 1, 1993, reflects changes in the Labor Department Consumer Price Index over the preceding three years (1990-1992) and will apply through the end of 1995. Since the adjusted $225 value is still less than $250, the related aggregating and reporting thresholds for regular gifts and reimbursements on the SF 278 and SF 450 financial disclosure report forms will not be affected for the next three years. See "Ethics News Briefs," **Government Ethics Newsgram**, Vol. 10, No. 2 (Summer 1993) on Public Laws 102-90 and 102-378, which amended the concerned Ethics in Government Act reporting provision.

OGE Regulatory Agenda Published

Last October, OGE published its most recent semiannual agenda of substantive regulations in the executive branch Unified Agenda of Federal Regulations. See 58 *Federal Register* 57152-57156 (October 25, 1993). The OGE agenda includes entries for each substantive OGE Government ethics regulation planned, including timetables for the forthcoming interpretive regulations under three conflict-of-interest laws (18 U.S.C. §§ 207, 208, and 209).

Supplemental Agency Ethics Regulations: An Update

The Commodity Futures Trading Commission has issued, with OGE concurrence, supplemental ethical conduct standards. See the Commodity Futures Trading Commission (final rule) -- 58 Federal Register 52637-52639 (October 12, 1993).

A total of eight agencies have now published additional proposed, interim, or final ethics regulations (seven supplemental standards and one supplemental financial disclosure) to supplement OGE's executive branch-wide regulations at 5 C.F.R. parts 2634 and 2635. Those agencies, as well as several others, have revoked the superseded portions of their old individual standards and financial disclosure regulations and have, as appropriate, reissued/modified any residual provisions thereof which are still valid.

Helpful Hints for SF 278 Filers and Reviewers

In preparation for the upcoming annual filing cycle of Public Financial Disclosure Reports (SF 278s), we offer some helpful hints for both reviewers and filers. We hope the suggestions will reduce follow-up work for agency ethics officials and filers.

Assets and Income: Schedule A

• Report each asset held in an Individual Retirement Account (IRA) or "Keogh" plan if the aggregate value of the account or plan meets either of the reporting thresholds—a fair market value exceeding $1,000 at the end of the reporting period or over $200 of income during the reporting period.

(Note that certain investment funds may qualify as "excepted investment funds" under the rules discussed in the instructions to the form. The underlying holdings of such funds need not be reported.)

• Disclose the name, location, and line of business or investment holdings for partnership interests.

• Provide the specific name of each reported mutual fund, not just the fund's family name. (Example: "Fidelity Magellan Fund" as opposed to "Fidelity Fund")

• Report asset valuations reflecting each asset's value at the close of the reporting period. If an asset was completely sold before the end of the reporting period, the value checked under "Block B, Valuation of Assets," should be "none." Any capital gains or other investment income over $200 generated by this asset during the reporting period should be disclosed, even though the asset is no longer held.

• Disclose accrued income, even if deferred or exempt for tax purposes, and the category of amount of such income (or exact amount, if required). For example, an IRA consisting of a bank account that accrues $400 in interest during the covered period must be reported since the accrued income exceeds $200.

• Report the actual amount of income when the "other" column is used to describe a type of income. This includes any earned income other than from current U.S. Government employment. For a spouse's earned income, only the source must be reported. However, an actual amount for honoraria and/or business income must be disclosed.

• Ensure that, when severance payments, pensions, and other benefits are listed on Schedule A, the terms of the agreements covering these benefits are disclosed on Schedule C, part II.

Transactions: Schedule B, Part I

• Identify the asset's full name.

• Report the names of all assets involved in an exchange.

• Ensure that, when sales are reported on Schedule B, Schedule A reflects any corresponding capital gains and any dividends or interest realized prior to sale, if over $200.

• Provide information for the entire reporting period, and not solely for the last month or quarter of the period, if bank or brokerage statements are included as part of annual or termination reports.

Liabilities: Schedule C, Part I

Disclose any reportable liabilities which exceeded $10,000 at any time during the reporting period, and ensure that the highest amount owed is reflected. Revolving charge accounts, however, do not need to be reported unless they exceed $10,000 at the end of the reporting period.

Outside Activities: Schedule D, Part I

Report all positions held at any time during the reporting period, including those from which the filer may have resigned before the end of the reporting period.

General Suggestions

The following suggestions are not statutory requirements. However, the information is useful in conducting report reviews and can reduce the need for OGE follow-up on SF 278s transmitted to us. When additional information is suggested, it may be included either in the Comment section on page 1 of the SF 278, or on a separate sheet to be included in the files, but not to be made publicly available.

• Indicate whether the filer received an initial 45-day extension, where applicable.

• Indicate a basis for the receipt of gifts and/or travel reimbursements by the filer, for purposes of Schedule B, Part II. A brief notation, such as "personal friend" or "agency approval under 5 U.S.C. § 4111," would suffice. Remember, gifts of travel accepted by the agency under the authority of 31 U.S.C. § 1353 are not reportable.

• Note whether a liability was completely liquidated, for purposes of Schedule C, Part I, when the liability disappears from one year to the next.

• Make certain that all sections of the report are completed, and that "None" and "Not Applicable" are checked appropriately and are not used interchangeably.

• Compare the current report to the prior report (if any) to make certain that all items are accounted for.

• Consider returning a copy of the certified report to the filer prior to the next filing cycle to ensure that any annotations are reflected by the filer on subsequent reports.

Notes from the Desk of Program Assistance

Guidance on Certificates of Divestiture

To avoid any actual or potential conflicts of interest, it is often necessary for an individual to divest certain assets when other remedial actions, such as a waiver or recusal, are not available or appropriate. When divestiture is deemed reasonably necessary, an individual may request relief from the tax aspects of a disposition of property in the form of a Certificate of Divestiture (CD) from OGE. See subpart J of 5 C.F.R. part 2634.

As with all other aspects of ethics agreements entered into by Senate-confirmed appointees, a divestiture (with or without benefit of a CD) must take place within 90 days of the confirmation date. Consequently, if an individual is eligible to receive a CD, and wishes to take advantage of the opportunity for nonrecognition of gain, the individual should request the CD as early as possible to ensure that the divestiture is completed before the 90-day period expires.

Upon receipt of the CD, the individual may then dispose of the property for which the certificate was issued. In order to enjoy nonrecognition of gain from the sale, the proceeds must be invested in "permitted property" within 60 days from the date of sale. See 5 C.F.R. § 2634.1003. This does not mean that the individual has an additional 60 days to satisfy the ethics agreement. Again, any sale must be completed within 90 days from the date of confirmation. It is upon the sale of the asset (and not upon receipt of the CD) that the 60-day reinvestment period begins.

Since time is critical in satisfying ethics agreements, it is imperative that, when requesting a CD, the requesting individual and the agency closely follow the procedures found at 5 C.F.R. § 2634.1002(b)(1). In particular, the materials required to be submitted to OGE must include:

- a copy of the individual's written request to the Designated Agency Ethics Official (DAEO) for a CD, which must be signed by each individual holding a beneficial interest in the conflicting property, and by the trustee of any trust in which property to be divested is held;
- a copy of the individual's latest financial disclosure report (if applicable);
- a detailed description of the property the individual wishes to divest, which includes but is not limited to, the name of the security's issuer, the number of shares or face amount of the debt instrument, the names of the holders of such interests, and the legal title held by such individuals;
- a complete description of the facts and circumstances relevant to the determination of "reasonable necessity" of divestiture; and
- an analysis and opinion from the DAEO concerning the application of 18 U.S.C. § 208, or any other Federal conflict-of-interest statute, regulation, rule, or Executive order.

For assets held in a trust, in addition to the documents required by 5 C.F.R. § 2634.1002(b)(1), an individual must also submit to OGE:

- a copy of the trust instrument;
- a list of the current holdings of the trust;
- a memorandum identifying all parties who hold a beneficial interest in the trust's principal or interest, and describing the relationship of such parties to the Government employee; and
- a signed request from the trustee to the DAEO to pursue certification in the case of property to be divested.

A Reminder Regarding DAEO Designations

We remind all agency ethics officials that OGE must receive written documentation from any agency in which there has been a change in the individual serving as the Designated Agency Ethics Official (DAEO), or Alternate DAEO.

When any changes occur in the status of an agency's DAEO or Alternate DAEO, or when an agency is newly created, 5 C.F.R. § 2638.202(b) requires the head of each agency to appoint an individual to serve as the DAEO and an individual to serve in an acting capacity in the absence of a DAEO (i.e., the Alternate DAEO). Section 2638.202(c) requires each agency head to delegate to the DAEO and Alternate DAEO the authority to coordinate and manage the agency's ethics program and, within 30 days of such delegation, to submit to OGE a formal written designation. The written designation must include: the names of the individuals designated, the title of the position held by each designee, and a copy of the delegation of the authority.

Mark Your Calendar!

The **General Services Administration's semi-annual travel report** covering travel from non-Federal sources for the period of October 1, 1993 to March 31, 1994, are due to OGE on May 31, 1994. We remind you that negative reports are required.

Do You Need Help....

...providing ethics training to employees stationed overseas? OGE's Office of Education has issued a revised Memorandum to Designated Agency Ethics Officials, General Counsels, and Inspectors General, entitled "International Ethics Training Coordination," dated March 4, 1994 (DT-94-011), to provide some assistance. This memorandum lists overseas personnel and offices that will be delivering ethics training. Agencies should use this listing to coordinate ethics training efforts abroad.

OGE Access to Confidential Disclosure Records

While conducting ethics program reviews, some agency ethics officials have been reluctant to allow OGE access to employees' confidential financial disclosure records expressing Privacy Act concerns. However, to perform its mission, OGE requires access to certain information agencies must safeguard against unauthorized public release. This, of course, includes information which is found on the "Executive Branch Personnel Confidential Financial Disclosure Report" (SF 450) and other substitute or predecessor reports which have been properly authorized by OGE. When an agency is requested to furnish such records to OGE, the disclosure is made pursuant to the provisions of the Privacy Act at 5 U.S.C. § 552a(b)(1).

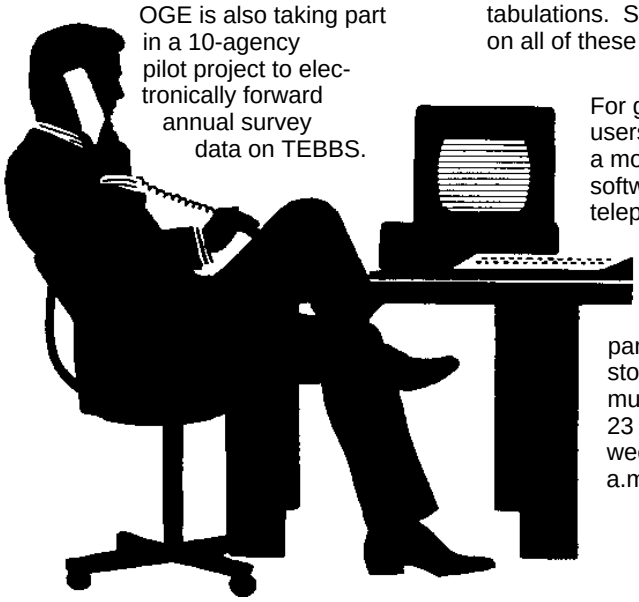
The Privacy Act authorizes the agency which maintains a system of records access to those records. OGE is the system manager for the Confidential Statements of Employment and Financial Interest system of records (OGE/GOVT-2). See 55 *Federal Register* 6327-6331 (February 22, 1990). Thus, OGE is allowed access to review the confidential disclosure reports without the advance written permission of individual filers.

The Privacy Act allows unfettered access to confidential records "to those officers and employees of the agency which maintains the record who have a need for the record in the performance of their duties." Under the Ethics in Government Act of 1978, certain conflicts-related statutes, and OGE's executive branch-wide regulations, OGE has the authority to review agency ethics programs and advise on conflict-of-interest matters. Therefore, the Privacy Act cannot be interpreted as restricting the access of OGE employees to confidential disclosure records when such access is required to perform their duties.

While Designated Agency Ethics Officials are responsible for the maintenance, collection, and physical custody of confidential disclosure reports under 5 C.F.R. § 2638.203(b), OGE maintains confidential disclosure records for the purpose of access determinations. Agency officials may be assured that OGE takes its responsibility to protect the personal data on confidential reports very seriously, and takes all necessary steps to prevent the unauthorized or improper disclosure of confidential information. Keeping that in mind, both OGE and agencies are authorized to utilize the information in accordance with proper Governmental purposes.

OGE Expands Tebbs

OGE has expanded The Ethics Bulletin Board System (TEBBS) to include the **Government Ethics Newsgram**. Also offered are the recently published OGE pamphlets, **Take the High Road** and **Do It Right**. All of these publications are available in the "Files -Miscellaneous" section of TEBBS as postscript files. The files and a postscript printer enable users to produce a "camera ready" black-and-white copy.



OGE is also taking part in a 10-agency pilot project to electronically forward annual survey data on TEBBS.

In addition, OGE's Office of Information Resources Management (OIRM) is researching the use of TEBBS to transmit the semiannual reports of payments accepted by agencies pursuant to 31 U.S.C. § 1353. OIRM is also examining the use of database technology for reporting information such as the number of complete and incomplete public financial disclosure (SF 278) filings, thus eliminating the current practice of manual tabulations. Stay tuned for further details on all of these endeavors.

For global access to TEBBS, users need a personal computer, a modem, a telecommunications software package, and a telephone line. TEBBS will accommodate baud rates ranging from 300 to 14,200. The modem settings are: full duplex; no parity; 8 bit data length; one stop bit. TEBBS supports multiple lines and is available 23 hours a day, seven days a week. It is not available 7:00 a.m. to 8:00 a.m. Eastern Standard Time (EST), when routine maintenance is performed. For public access to TEBBS, call (202) 523-1186.

User assistance is available from 8:00 a.m. to 4:00 p.m. EST, Monday through Friday (except Federal holidays) at (202) 523-5757.

Honoraria Update

On January 19, 1994, the Solicitor General filed a petition for certiorari asking the Supreme Court to review the judgement of the U.S. Court of Appeals for the District of Columbia in National Treasury Employees Union v. United States, 990 F.2d 1271 (D.C. Cir. 1993). In that case, the U.S. Court of Appeals affirmed a lower court decision that held the honoraria ban unconstitutional.

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Ethics training materials for the Center are currently being accepted from all executive branch agencies. A complete listing of materials is being developed and will be continuously updated as new materials are produced and sent to OGE. See subsequent issues of the **Government Ethics Newsgram** for more details!

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