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Ethics Newsgram

OGE Publishes New Section 208 Exemption Regulation

OGE published a final rule, "Interpretation, Exemptions and Waiver Guidance Concerning 18 U.S.C. § 208 (Acts Affecting a Personal Financial Interest)," in the Federal Register for December 18, 1996, with an effective date of January 17, 1997. See 61 *Federal Register* 66830-66851 (December 18, 1996), as corrected at 62 *Federal Register* 1361 (January 9, 1997).

Section 208(a) of title 18, United States Code, prohibits employees of the executive branch from participating in an official capacity in particular matters in which they, or certain persons or entities with whom they have specified relationships, have a financial interest. Subpart A of the new regulation provides definitions and a general explanation of the scope of 208(a). Additionally, section 208(b) permits waivers of the prohibition in certain cases. Subpart C of the final rule provides guidance on the issuance by agencies of individual waivers pursuant to 208(b)(1) and (b)(3).

Finally, section 208(b)(2) authorizes OGE to exempt certain financial interests from the statute's prohibition where OGE has determined that the interests are too remote or inconsequential to affect the integrity of employee services. Subpart B of the final rule contains these exemptions, which are summarized below.

Diversified mutual funds and diversified unit investment trusts

The regulation exempts from the application of the prohibition contained in 18 U.S.C. § 208(a) the holdings of "diversified mutual funds." A fund is "diversified" if it does not have a policy of concentrating its investments in an industry, business, country (other than the U.S.) or State. An employee may work on assignments or projects affecting holdings in nondiversified

or "sector" mutual fund as long as the affected holdings are not in the fund's area of concentration.

Employee benefit plans

The regulation exempts from the application of 18 U.S.C. § 208(a) holdings in the Federal Government Thrift Savings Plan and State and local Government pension plans.

The exemption also applies to interests in other types of employee benefit plans, usually pension plans from former employers, if the plan manager has a written policy of diversifying assets; the investments of the plan are administered by an independent trustee; and the plan is not a

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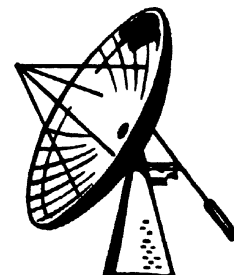
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GATE and OGE Receive Award for Satellite Broadcast

The Government Alliance for Training and Education (GATE) and OGE received an award for the satellite ethics training broadcast on April 30, 1996. The award, "Second Place for Best Direct Broadcast Satellite Application as a One Time Special Event," was presented at the Fifteenth Annual TeleCon Awards Dinner, called "The Academy Awards of Teleconferencing," in Anaheim, California, on October 30, 1996. Locally, the award was presented to OGE at a GATE meeting on February 4, 1997. Phil Westphal, President of the Federal Government Distance Learning Association and Robbie Smith, Vice President of GATE, made the presentation. Jo Lee Hazelwood accepted the honor for OGE. Other agencies supporting the project were represented at

the ceremony: George Brown, Veterans Administration; Steve Larkin, Internal Revenue Service; and MAJ Rick Gividen from the Army National Guard Bureau. A representative from the Federal Aviation Administration was unable to attend. The plaque is displayed at OGE.



Director's Column

One of the truly extraordinary developments of the 90s has been the growth in global awareness of the importance of government ethics. Countries around the world are gaining a greater appreciation of the need for a strong ethics program to ensure accountability of public officials and to maintain openness in government operations. There is also an increasing realization that a government that maintains high ethical standards reaps significant dividends in the economic sphere in terms of investment, development and trade.

This awareness has led to cooperative efforts among nations that demonstrate a serious commitment to doing something to combat public corruption and misconduct. Last year, the countries of the Western Hemisphere signed an anticorruption treaty that bans transnational bribery and mandates preventive measures including standards of conduct, ethics education and public financial disclosure. Just this past December, on the occasion of its ratification of this treaty, Argentina announced that it will be establishing a government ethics office.

The momentum of this movement is being felt in other areas as well. The United Nations is at work on the development of a code of conduct for public officials. The Organization for Economic Cooperation and Development has increased the pressure on its members to agree to stop allowing business tax deductions for



companies who pay bribes in other countries. Both the World Bank and the International Monetary Fund are giving closer scrutiny to the conduct of public officials in evaluating recipients of funding.

Nations of the world do look to us for leadership and example as they seek to establish the values and build the institutions that will promote a more ethical government and a more peaceful and prosperous society. Although we certainly must keep a cautious perspective, recent events do give us, as members of the ethics community, reason to take great pride in the knowledge that the work we do is making an important contribution to such a positive development in the world today.

New Section 208

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profit-sharing or stock bonus plan (other than a 401(k) plan).

Securities

The regulation provides an exemption from the application of section 208(a) for interests of no more than **\$5,000** in a publicly traded security which is affected by a matter involving specific parties to which an employee has been assigned. For purposes of this exemption, the term "security" includes mutual funds and limited partnerships that are publicly traded. In practical terms, this exemption would apply when an employee has been assigned to work on a contract, application, case, claim, or other type of similar matter that would be likely to affect a

publicly traded holding of \$5,000 or less. The exemption also applies to long-term Government bonds and municipal securities.

If the Government matter to which an employee has been assigned does not involve "parties," but is a more general type of matter (like drafting a regulation focused on a particular industry), the employee may work on the assignment if he owns no more than **\$25,000** worth of securities in a company that is part of the class affected by the matter. If an employee has holdings in more than one company affected by the matter, he can work on the assignment if the combined

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Government Ethics Newsgram

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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.

In an effort to expedite the distribution of the Government Ethics Newsgram to the ethics community and other interested parties, the Director of the Office of Government Ethics has asked the **Government Ethics Newsgram** staff to publish this issue "in-house." As a result, the format has been modified to accommodate this request. If you have any comments or suggestions regarding the new format, please direct them to the editorial staff at the OGE address given above.

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.



New Section 208

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value of those holdings is no more than **\$50,000**. The holdings of the employee and those of his spouse and minor children must be combined in calculating the value of the securities for purposes of these exemptions.

If a stock or other security holding that is valued below one of the regulatory exemption thresholds subsequently increases to a value over the threshold, the relevant exemption will no longer apply. In such a case, to continue working on an assignment affecting the holding, an employee will need to divest the holding to an amount below the threshold level or obtain an individual waiver.

There are also some exemptions of more limited application for certain securities including: short-term Federal Government securities and U.S. Savings bonds; securities held by tax-exempt organizations; and securities worth no more than \$200,000 owned by an employee's general

partner. There is also an exemption for all interests of a *general* partner where an employee is a *limited* partner in a large partnership.

Miscellaneous Exemptions

There are several exemptions that apply in limited circumstances. These pertain to: hiring decisions involving job applicants when the employee owns securities or has a pension interest in the corporation employing the applicant; financial interests arising from Federal Government employment or from Social Security or veterans' benefits; certain assignments or projects that affect universities; special Government employees working on advisory committees; mutual insurance policies;



Tennessee Valley Authority employees and Directors of Federal Reserve Banks.

Pending the issuance of OGE's branchwide exemptions, exemptions issued by individual agencies prior to November 30, 1989, have continued to apply. See 5 C.F.R. § 2635.402(d)(2) and new § 2640.206. However, upon the effective date of the final OGE regulation, all of the agencywide exemptions issued pursuant to 18 U.S.C. § 208(b)(2) as in effect prior to November 30, 1989, were superseded.

Additional information is available in the Federal Register notice and in the December 23, 1996 DAEOgram (DO-96-053). OGE has also published a pamphlet called "Conflicts of Interest and Government Employment" describing section 208 generally and the new regulation. The DAEOgram and the pamphlet are available on the OGE Web site at <http://www.access.gpo.gov/usoge>.

New Duties for Ethics Officials

The final rule implementing the amended procurement integrity provisions was recently published with an effective date of January 1, 1997. See 62 *Federal Register* 226-233 (January 2, 1997). Section 4304(a) of the National Defense Authorization Act for FY 1996 (Pub.L. 104-106) had amended the procurement integrity provisions (Section 27 of the Office of Federal Procurement Policy Act, as codified at 41 U.S.C. § 423). See "Substantial Changes Made in Procurement Integrity Law," **Government Ethics Newsgram**, Vol. 13, No. 2 (Summer 1996).

OGE does not have any responsibility for the issuance of the new Governmentwide procurement integrity rule. However, agency ethics officials should become familiar with the recent amendments and the final rule (which amended the procurement integrity provisions in the Federal Acquisition Regulation) because they will be working with these new requirements. The following is a brief description of these new requirements that affect agency ethics officials.

◆ Agency ethics officials will receive "contact" reports. The new provisions require that if an agency official, who is participating personally and substantially in a Federal agency procurement (in excess of the \$100,000 simplified acquisition threshold), contacts or is contacted by a bidder or offeror in that agency procurement regarding possible non-Federal employment for that official, the official shall promptly report (among other actions) the contact in writing. This report must be provided to the official's supervisor (or designee) and to the agency's designated agency ethics official (or designee). See 48 C.F.R. § 3.104-4(c).

◆ Agency ethics officials will be consulted in reinstatement matters. An agency official who has disqualified himself or herself from participating in a procurement may be authorized to resume participation in that procurement under certain conditions. The Head of the Contracting Activity (HCA) or designee has the discretion to authorize an official's reinstatement in a procurement matter. The HCA or designee is, however, required to consult with an agency ethics official in making a determination to reinstate an official. See 48 C.F.R. § 3.104-6.

◆ Agency ethics officials will provide post-employment advice. In general, a former official may not accept compensation from a contractor, as an employee, officer, director, or consultant of the contractor, for one year after such former official served in certain positions for a contract in excess of \$10,000,000 (at the time of award to or selection of the contractor) or made certain decisions regarding a \$10,000,000 contract. Agency officials or former officials may request an ethics opinion on whether or not the official may accept compensation from a particular contractor. Ethics officials must then issue an advisory opinion within 30 days (or as soon thereafter as practicable) of a complete request. The final rule also provides that good faith reliance on a written opinion of the agency ethics official protects both the former official and the contractor. See 48 C.F.R. § 3.104-7. Ethics officials should note that some restrictions under the old procurement integrity provisions will continue to apply through December 31, 1998 to former agency officials whose employment ended before January 1, 1997. See 48 C.F.R. § 3.104-2(d).

Helpful Hints for SF 278 Filers and Reviewers

In preparation for the upcoming annual filing cycle of Public Financial Disclosure Reports (SF 278), we offer some helpful hints intended to reduce follow-up work for agency ethics officials and filers. All annual reports are due at the agency on May 15, 1997.

Cover Page

For termination reports, include the termination date, and insure that the filer's signature date is no earlier than the last day of service in the position.

Indicate in the comment section if the filer received an initial 45-day extension.

Assets and Income: Schedule A

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

For entries checked in a column labeled "over \$1 million" on Schedule A or C, where the assets, income or liabilities are not held solely by a spouse or dependent child, provide a notation designating a more specific valuation. For assets and

liabilities, indicate whether the value is between \$1-5 million, \$5-25 million, \$25-50 million, or over \$50 million. For income, indicate whether the earnings are between \$1-5 million or over \$5 million.

Transactions: Schedule B, Part I

If a "sale" transaction appears on Schedule B for an asset listed on Schedule A with a value exceeding \$1,000, indicate whether a partial sale occurred. If the asset was sold entirely, the asset value shown on Schedule A should be "none or less than \$1,001."

Gifts: Schedule B, Part II

If a gift of travel is reported, specify the basis for the acceptance, e.g., "a personal friend" or "agency approval under 5 U.S.C. § 4111."

Positions Held Outside Government: 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.

Miscellaneous

Ensure that all sections of the report are completed and that "None" and "Not Applicable" are checked appropriately and are not used interchangeably.

Annual Survey of Prosecutions

The Office of Government Ethics (OGE) recently published its annual Conflict of Interest Prosecution Survey, a compendium of summaries of prosecutions of criminal conflict of interest cases. See the DAEOgram of January 31, 1997 (DO-97-009). The survey provides information on the most serious conflicts violations in the Federal Government, many of which are not elsewhere reported.

The survey is based on information provided in response to a questionnaire that is sent to the Offices of the United States Attorneys (USA) throughout the United States. The survey is coordinated through the Executive Office of the United States Attorneys within the Department of Justice and through ethics contacts in each of the USAs' offices.

In response to the questionnaire, USAs describe prosecutions of conflict of interest cases occurring within their jurisdictions during the previous year. In preparing the survey, OGE occasionally contacts the prosecuting attorney regarding a case that has been reported. OGE also receives information regarding particular cases from the Public Integrity Section of the Criminal Division of the Department of Justice.

Many ethics officials find the Prosecution Survey to be a useful resource for training executive branch employees about the conflict of interest laws and their application.

Ethics Training Workshops Offered in FY 1997

OGE will present free identical four-hour ethics training workshops for fiscal year 1997 in the following cities:

San Francisco, CA	April 8 - April 9
Dallas, TX	May 7 - May 8
Boston, MA	June 10 - June 11
St. Paul, MN	July 8 - July 9

Several workshops have been completed at various locations. Training workshops scheduled in Washington, DC will be announced separately.

These workshops are formatted to challenge experienced ethics practitioners with exercises that go beyond mere case studies. Class size is limited, and registration for the workshops is accepted

on a first-come basis. If you are interested in participating in a workshop, contact Sheila Powers at 202-208-8000, extension 1104, or see the January 17, 1997, DAEOgram (DO-97-006) for registration information.



Broad Trends Surface in PRD Reviews

During the course of ethics program reviews, Program Review Division (PRD) staff members are frequently asked questions, such as, "How many agencies do you review?" "How often do you encounter a particular problem?" or "How many or what kind of recommendations do you typically issue per report?" Statistics concerning the programs reviewed in 1996 generally address some of the most frequently asked questions and reveal broad trends.

In 1996, PRD issued a total of 40 reports representing reviews of a wide variety of agencies and departments. In addition, PRD prepared four regional reports that were incorporated into headquarters' reports. During these reviews, PRD examined approximately 5,400 financial disclosure reports (1,400 public and 4,000 confidential).

A total of 90 recommendations were issued in the 40 reports. Twelve reports did not contain any recommendations; the most in one report was 13. The recommendations can be placed in one of six broad categories. The percentages of recommendations for each category

(very similar to those of 1995) are as follows:

◆ Financial Disclosure	70%
◆ Ethics Training	18%
◆ Acceptance of Travel Payments from non-Federal Sources	8%
◆ Outside Activities/Employment	2%
◆ Counseling and Advice	1%
◆ Supplemental Regulations	1%

The vast majority of recommendations were related to financial disclosure, followed distantly by ethics training. Fifty-seven percent of the recommendations concerning financial disclosure pertained to the timeliness of report collection; of these, almost half (46 percent) were directed at new entrant report collection. Initial ethics training represented 75 percent of the recommendations within the category of ethics training. Many agencies have had difficulty developing methods for timely identification of employees entering into covered positions in order to meet requirements of the financial disclosure and training regulations.

The 40 reports issued by PRD in 1996 also included at least 70 suggestions or

informal recommendations covering a very broad range of topics. Most common topics include: overdue confidential financial disclosure reports, technical errors in financial disclosure reports, failure to provide training to all covered employees, untimely review of confidential reports, and missing entries on semiannual travel acceptances reports to OGE.

In 1996, PRD completed 43 follow-up reports, including seven second follow-ups and two third follow-ups. We were able to close outstanding recommendations for 29 reports. At the year's end roughly nine reports had outstanding recommendations. One Notice of Deficiency was issued to an agency based upon the results of the program review.

Kudos in the Ethics Community

Jeff Green, an attorney with the Office of General Counsel at the Department of Veterans Affairs (VA), has published an article entitled, "History of Conflicts Law," in the September 1996 edition of the **Federal Practitioner**. The publication is distributed to all doctors at VA, Department of Defense, and the Public Health Service.

"History of Conflicts Law" discusses the history of Federal ethics conflicts of interest laws within the context of how our Government responded when individuals charged with serving the people put their personal interests first.

OGE has informally advised that the use of this article along with the 14 principles of Subpart A of the Standards of Conduct and a copy of the criminal conflicts of interest laws will satisfy the written materials exception to the proposed training regulation.

To obtain a copy of the article, visit the Ethics Information Center or contact Jeff Green at VA at 202-273-6340.

Web Site Provides a Wealth of Information

If you have Internet access, now is the time to visit OGE's new Home Page. It provides information about all OGE program areas. It outlines the services that OGE provides to other agencies in the executive branch. Complete texts of applicable Executive orders, statutes, regulations, advisory letters, DAEOgrams, OGE forms, publications and reference materials are available. It includes this issue and back issues of the **Government Ethics Newsgram**. It also includes written information on OGE's videos, CD-ROMs, and audio training materials. In future editions of the **Government Ethics Newsgram**, look for a column titled "What's New," telling you what has been placed on the Web site since our last



edition. If you have Internet access, a few keystrokes will bring a wealth of ethics information. The address is <http://www.access.gpo.gov/usoge>.

Ethics News Briefs

Supplemental Agency Ethics Regulations Update

With OGE's concurrence and co-signature, the following additional agencies have issued, for codification in title 5 of the Code of Federal Regulations (C.F.R.), interim final or final rule supplemental standards of ethical conduct for their employees (in addition to the executive branchwide standards at 5 C.F.R. part 2635). Most of the agencies also replaced their residual old standards which have been superseded with a cross-reference to the new provisions and reissued certain un-superseded provisions.

Federal Energy Regulatory Commission (final rule) — 61 *Federal Register* 43411-43415 (August 23, 1996).

Board of Governors of the Federal Reserve System (final rule) — 61 *Federal Register* 53827-53830 (October 16, 1996).

Federal Communications Commission (final rule) — 61 *Federal Register* 56109-56114 (October 31, 1996).

General Services Administration (final rule) — 61 *Federal Register* 56399-56403 (November 1, 1996).

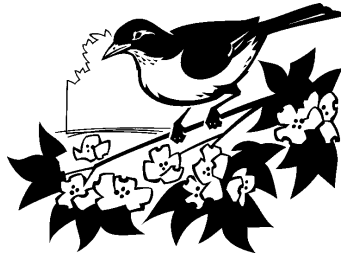
Department of Labor (interim final rule) — 61 *Federal Register* 57281-57287 (November 6, 1996).

Department of Justice (interim final rule) — 61 *Federal Register* 59811-59815 (November 25, 1996).

National Science Foundation (interim final rule) — 61 *Federal Register* 59815-59820 (November 25, 1996).

Consumer Product Safety Commission (final rule) — 61 *Federal Register* 65457-65459 (December 13, 1996).

Note: The one agency that had supplemental financial disclosure regulations, the Federal Deposit Insurance Corporation, decided (with OGE's concurrence and co-signature) to remove those supplemental regulations, and to handle such matters by internal written agency



procedures as other agencies do. See 61 *Federal Register* 50947-50948 (September 30, 1996) (final rule).

Proposed Certificate of No New Interests

OGE published a proposed rule on an optional certificate of no new interests as an alternative procedure for regular employee annual OGE Form 450 confidential financial disclosure report filers. See 62 *Federal Register* 2048-2052 (January 15, 1997).

Miscellaneous

OGE's Fall 1996 semiannual regulatory agenda was published as part of the executive branchwide Unified Agenda of Federal Regulatory and Deregulatory Actions. See 61 *Federal Register* 63292-63298 (part XXXII) (November 29, 1996).

The General Services Administration has raised the "minimal value" threshold for purposes of the Foreign Gifts and Decorations Act to \$245 for the three-year period, 1996-1998. See 61 *Federal Register* 60034 (November 26, 1996).

Ethics in Action

In response to the Summer 1996 Readership Survey comments received, we provide you with ethics scenarios that apply the Standards of Ethical Conduct for Employees of the Executive Branch.

Q: Suzanne is taking up a collection from everyone in her section for a new briefcase to be presented to the division chief on the occasion of his retirement. Suzanne tells each person his or her share is \$5.00.

Is this arrangement permissible?

A: On special, infrequent occasions of personal significance and on occasions that terminate a subordinate-official superior relationship, employees may solicit voluntary contributions of nominal amounts for a gift to an official superior. [§ 2635.304(c)] However, Suzanne, may not tell

each employee what his or her "share" will be when she is soliciting voluntary contributions.

Q: Peter, a regional manager for the FDIC, is asked to write a letter of recommendation for an employee who wishes to apply to law school.

Can Peter use his official Government title and agency letterhead for the recommendation?

A: Yes. If requested, under § 2635.702(b), employees may sign letters of recommendation or reference using their official titles, if the letters are for individuals with whom they have worked in their Government capacities. Additionally, employees may use their titles in letters of recommendation or reference for individuals they know who are applying for Government positions. They may also use agency letterhead in these cases.

Q & A

Agencies Refine Ethics Programs

An ethics program review need not be an unpleasant experience. Program Review Division (PRD) staff insist that we really are "here to help." Several agencies we have recently reviewed would likely agree. Thanks to prompt action by competent and dedicated staff, these agencies implemented PRD's suggestions prior to culmination of their reviews, thereby eliminating the need for OGE to issue certain report recommendations.

By far, the largest number of recommendations OGE issues concern financial disclosure systems and education and training programs. A large number of these recommendations are aimed at refining essentially sound programs. These types of corrections do not usually involve arduous work or significant time. Taking advantage of the presence of on-site OGE officials can further ease the review process.

During one recent review, PRD staff discovered that an agency was requiring SF 450 filers to provide additional financial information not requested on the standard form. OGE regulations require that an agency must obtain specific authorization from OGE to impose additional reporting requirements on public or confidential filers. During the course of the review, PRD staff notified the DAEO of this requirement. The DAEO subsequently submitted a written

request to OGE and obtained the necessary approval.

At another agency, PRD staff found that the DAEO had granted filing extensions to SF 278 filers beyond 45 days of the due date, although only OGE has the authority to grant such extensions. Discussion with the DAEO revealed that the DAEO had granted the extensions based on the dates the extensions were requested rather than on the due date. After talking with the DAEO, PRD reviewers were satisfied that the misunderstanding was legitimate and had been clarified. The problem was addressed and no report recommendation was made. Furthermore, none of the unauthorized extensions resulted in requiring a \$200 late filing fee.

At several agencies, PRD staff uncovered inadequate procedures for identifying employees within 30 days of their entering into a covered position. As a result, new entrant filers were not filing timely reports. In most of these cases, under the guidance of PRD staff, agency ethics officials quickly developed new systems for capturing covered employees. Once PRD reviewers were satisfied the new systems were adequate, pertinent personnel had been notified, and the new processes would, in fact, be implemented, no formal recommendations were made.

Most agencies that had difficulty identifying new entrant filers also did not provide new

entrant ethics orientation, as required. In all of the cases where the dual problem existed, adequate training materials or procedures were already prepared. With the improvement or development of new entrant identification processes, the fundamental problem was solved. These agencies simply linked the orientation process to the new entrant identification process.

Other training issues included a situation where an agency was providing no ethics training to special Government employees (SGE); the agency began distributing appropriate ethics training materials to SGEs while PRD reviewers were still on site. At other agencies, training materials needed clarification or corrections. The necessary changes were made to the materials while the reviewers were still there, eliminating the need for recommendations.

Most of the corrections required in the examples above did not involve substantial effort. Already strong programs were enhanced by easy refinements. The ethics officials were readily able to consult with the reviewers about efficient ways to implement the changes required. And, in the cases where no other recommendations were issued, no 60-day response letter was required, nor did OGE conduct a follow-up review.

New OGE Videotapes Available

Two new OGE ethics training videotapes are available. "The Revolving Door" is a 20-minute news show that addresses the issues surrounding the seeking employment and post-employment restrictions on executive branch employees. A reporter also provides periodic updates on a Congressional hearing focusing on a possible employee violation of post-employment law.

In "The Battle for Avery Mann," an average executive branch employee struggles with the rules governing everyday conduct, including using

Government equipment for personal documents, accepting a gift from a subordinate, and working on a project that involves his outside employer. Avery is caught between what he knows is the right thing to do and what would be more convenient and beneficial to him. This videotape is approximately 20 minutes long.

Contact Angelique Ewell at 202-208-8000, extension 1111, if you would like an order form or ordering information. INFOCUS in Herndon, Virginia, is the distributor for VHS copies of both videotapes.



Readership Survey Proves Helpful

Although a small number of our readers responded to the Readership Survey printed in the Summer 1996 issue of the **Government Ethics Newsgram**, the results have provided valuable information to OGE. All general comments were positive and generous. Many of you are reading and sharing the information with others by passing around your **Government Ethics Newsgram** or making copies. Colleges and universities nationwide also use the **Government Ethics Newsgram** as a teaching tool.

Many respondents would like direct application of their ethics knowledge. Therefore, we are beginning a column in this issue called "Ethics in Action" (see page 6) where we provide at least one question and its answer on a general ethics topic. If you have a question/scenario you wish for us to address, fax any relevant information to the editors at 202-208-8039.

As we expected, many of you have new positions, titles, and/or addresses. Please make any corrections on the address label of this **Government Ethics Newsgram** and fax the corrected label to Rhonda Curtis at 202-208-8039.

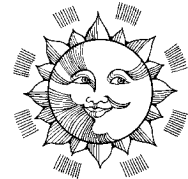
New OGE Pamphlets Available

Three ethics pamphlets are now available from OGE to serve as quick desktop references. They were distributed on February 24, 1997, in a DAEOgram (DO-97-012). Camera-ready copies can be accessed on the OGE Web site at <http://www.access.gpo.gov/usoge>. Each agency may make its own copies for employee use.

"Rules for the Road," a post-employment pamphlet, was first seen at the 1996 Government Ethics Conference. It is divided into several parts, each summarizing one or more restrictions that may affect what you can do when you leave Government service or when you leave certain Government positions.

"Conflicts of Interest and Government Employment" describes 18 U.S.C. § 208 generally and the new regulation. (See article on page 1.)

"Gifts of Travel and Other Benefits" provides a simple comparative chart that will be useful in analyzing key authorities available for accepting gifts of travel.



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Official Business
Penalty for Private Use, \$300