



United States  
**Office of Government Ethics**  
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## Leadership Initiative

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### Concrete Actions

OGE worked with several agencies to identify concrete actions that agency leaders may institute to promote an ethical culture and to support an agency's ethics program. In identifying the concrete actions several sources were consulted, including: OGE ethics program reviews, OGE's Ethics Program Review Guidelines, meetings between the Director of OGE and leadership from other agencies, an OGE Leadership Study, OGE surveys, and research by non-governmental organizations. A particularly valuable contribution was made by a focus group consisting of agency ethics officials.

Agencies seeking to enhance leadership support of the ethics program should consider the following concrete actions. Not all of the actions are suited to every agency. Implementation and maintenance of an effective ethics program requires careful, ongoing assessment of the program and the development of agency-specific strategies. Also, while many of these concrete actions are directed to agency heads, OGE recognizes that there are many levels of leadership; it is important that all levels of leadership work to achieve the goals of the Leadership Initiative.

#### Agency leadership can ...

Demonstrate commitment to and support of the ethics program by:

- meeting with OGE leadership to discuss the Leadership Initiative
- meeting with OGE leadership in connection with OGE's onsite ethics program reviews
- meeting with the OGE review team during the course of the agency's onsite ethics program review
- addressing agency ethics officials periodically at official functions
- signing written ethics-related guidance or instructions prepared by agency ethics officials

Communicate the importance of ethics by:

- participating personally in the selection of the DAEO
- underscoring the importance of the DAEO position by designating it at an SES level, and publicizing the designation and role throughout the agency

meeting one-on-one with key staff to discuss the importance of integrating ethics into everyday agency work

including ethics officials in senior staff meetings or other meetings attended by PAS employees, and inviting discussion of pertinent ethics issues

enhancing the visibility of the ethics office by ensuring it is clearly reflected in the organizational chart of the agency

highlighting the relevance of the ethics program agency-wide via speeches, e-mail, newsletters, memoranda and other effective means

emphasizing the importance of ethics requirements, such as filing financial disclosure forms and attending ethics training, via speeches, e-mail, newsletters, memoranda, and other effective means

disseminating information on pertinent ethics issues agency-wide by writing ethics-related articles for agency newsletters or other publications

awarding the achievements of ethics officials in areas including the timeliness, scope and content of training, as well as the administration of the financial disclosure filing systems

publicizing agency-wide any awards or commendations received by the ethics office, including OGE awards

Promote awareness of conduct that demonstrates commitment to an ethical culture, as well as underscore the consequences of unethical behavior by:

sharing illustrative stories that demonstrate commitment to ethical values

highlighting ethical vulnerabilities specific to the agency that employees may face

posting possible penalties for violating the ethics laws and regulations in public areas such as the agency's Intranet

presenting news media accounts illustrating the pitfalls of neglecting ethical considerations

Promote awareness of the ethics training program by having ethics officials brief senior staff on important ethics training program measurement outcomes including:

the effectiveness of ethics training based on the results of training evaluations

the percentage of employees who completed training

the timeliness of training employees on emerging ethics issues

Demonstrate the emphasis placed on ethics training by:

including in the agency's performance plan the development of specific ethics training projects such as videos, online training, pamphlets, and job aids

making a personal appearance at one or more ethics training session

participating in an ethics training session alongside employees

authoring a statement or speaking in a video segment to be used in ethics training sessions

announcing new training initiatives undertaken by ethics program officials and encouraging employee participation

Demonstrate the emphasis placed on an ethical culture by:

including a welcome letter underscoring the importance of ethical culture in orientation materials for new employees

making managers and supervisors accountable for the actions of staff who fail to fulfill their ethics requirements

delaying or precluding promotions and awards for failing to timely file financial disclosure reports or participate in training

Demonstrate personal ethical behavior by:

participating in Office of Government Ethics conferences and working groups, or other ethics community events

discussing ethical behavior and ethical decision-making with senior staff and employees on a routine basis

consistently seeking ethics advice and counseling before participating in a particular matter that may involve a conflict of interest

modeling a, "Should I do it?" versus, "Can I do it?" mentality

Promote the ethical merit of leadership actions by emphasizing the themes of transparency and accountability throughout the agency by:

explaining to employees, and when appropriate the public, how specific agency determinations were made

publicizing the completion of leadership's own ethics requirements, such as timely filing, prompt divestiture of financial interests when directed, creation of recusal screening arrangements, and attendance at ethics training

publicizing the outcome of ethics program reviews, describing what actions the agency plans to take to correct any deficiencies or to otherwise improve the program

Demonstrate vision by:

considering the advantages and disadvantages to the agency of appointing a career versus a non-career employee to the DAEO position

making a deliberate decision regarding the roles of career and non-career ethics officials in the reporting structure of the agency

emphasizing the need for close cooperation and coordination between career and non-career employees of the agency

establishing stated qualifications for the position of ethics official that ensure employees in the position have the ability to create and maintain a successful program

participating in meetings with officials from other similarly situated agencies to discuss common issues and share model practices to enhance the ethics program

seeking opportunities to raise the level of discourse relating to ethical issues by initiating outreach efforts to other agencies, other branches of Government, the private sector, and non-governmental organizations

incorporating ethics elements in the agency emergency preparedness plan

designating an ethics official to serve as a member of the agency emergency response team

consulting with ethics officials prior to implementing new agency programs, policies, or procedures to determine if there are potential ethical implications

incorporating ethics into the formal objectives of the agency, for example, into the goals of the strategic plan

identifying the necessary resources for an effective ethics program and allocating them accordingly

ensuring the ethics office is adequately staffed to achieve success

implementing training programs for non-career employees, contractors, and other appropriate groups

fostering a cooperative relationship between the ethics office and other relevant offices such as human resources and information technology

Promote an ethical culture of transparency, efficiency, and accountability by:

soliciting employees' ideas on how to maximize involvement in ethics

including ethics responsibilities as a critical element in performance plans and formal appraisals for agency ethics officials, managers, and supervisors

including meeting ethics requirements as a critical element in performance plans and formal appraisals of other appropriate employees

encouraging participation in Office of Government Ethics or other ethics community events

recognizing the value and expertise of the ethics staff in official statements and agency-wide communications

Emphasize the importance of follow-up and accountability by:

reviewing final OIG or other investigative office reports following investigations of cases of possible violations of the conflict of interest laws and the standards of conduct

demonstrating to employees that appropriate administrative action is taken in the cases of violations of the conflict of interest laws and the standards of conduct

demonstrating to employees that appropriate administrative action, such as delaying promotions, is taken in cases of delinquent financial disclosure filing

encouraging the full cooperation of agency employees with all investigations, audits, or reviews

establishing a mechanism or process to bring pertinent enforcement-related issues to the attention of agency leadership

highlighting the avenues that are available for employees seeking ethics advice

emphasizing to employees the importance of reporting observed misconduct

ensuring employees are cognizant of the appropriate channels for reporting observed misconduct

promoting awareness of protection available to employees who report observed misconduct

identifying time periods and circumstances in which misconduct is especially likely to occur and working proactively to minimize the risk

assessing the effectiveness of controls the agency has in place for identifying and reducing misconduct