



# **Financial Disclosure ... And Beyond! A Play In Three Acts**

Featuring the EPA Ethics Performers  
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# The Life of an Ethics Official



Ethics officials need certain skills to succeed

- Working knowledge of financial instruments
- Ability to communicate 360 degrees
- Knowledge of ethics statutes and regulations
- Ability to multi-task
- Time management skills
- Know when you can't do it all

Also key: ***MANAGEMENT SUPPORT***

## EPA Order 1000.28A: Our Ethics “Constitution”



EPA's ethics program is decentralized:

- ✓ Core team in Office of General Counsel (OGC) provides oversight for entire program
- ✓ Over 100 Deputy Ethics Officials (DEOs) with certain delegated authority
- ✓ DEOs may redelegate some of their authority to Assistant DEOs
- ✓ DEOs sign 450's, core team signs 278's

## Financial Disclosure: Only the Beginning



- ❖ Technical review is only part of the task
- ❖ Conflict review is harder, but even more important
- ❖ Be curious and probe deeper for information
- ❖ Reviewing forms is an opportunity, not a chore

What does a typical day look like for us?

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# The Inner Workings of Review

- Technical Review
  - Anything missing?
  - Any discrepancies with last filing?
- Conflicts Review
  - Private interests conflicting with public duties?
  - Watch for nuances: private vs. public stock, outside organizations made up primarily of federal employees
  - Ask for more information when needed
  - Ultimately, the filer is responsible for disclosure



# Where We Look For Information

## The form itself:

- Assets
- Agreements/Arrangements
- Outside positions

## Internet and Intranet:

- Internet search engines
- Internal databases

## Ask filer's supervisor

But, sometimes there's no substitute to talking with the filer...



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**ACT II**

**A New  
Filer**



## Tips For Talking With Your Filer



- May not be as focused as you on ethics
- Look below the surface for underlying issues
- Build relationship with your filer
- Ask questions, try to be pleasant
- You are not an accountant (unless you really are)

## Dealing With Ethics Issues



- Keep focused on your mission
- Ethics nuances (e.g, private vs. public stock)
- The filer may not see the issues the same way you do
- Remember: YOU are the ethics official
- Some examples we've seen

But, you have to go beyond financial disclosure and build a culture of ethics

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**ACT III**

**A**

**Culture  
Of Ethics**

## Building A Culture of Ethics

- No person is an island
- Work within your structure
- Don't need to know everything
- Prevent problems from happening
- Set achievable goals
- Cultural change can take years



## You Set The Standard



- It's not just what's legal, it's what's right
- You can do everything to letter of law, but still lose in the court of public opinion
- Have to go beyond compliance and create a culture of ethics
- Just have fun!

# That's All, Folks!



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