2010 Financial Assistance Workshop

GMD Connected: The New Decade

Government Ethics Rules
For Grants Administrators and Grantees
Arthur Warren
Senior Counsel for Ethics
FINANCIAL CONFLICTS OF INTEREST
AVOID SELF-DEALING

- A NOAA EMPLOYEE MAY NOT WORK ON A GRANT OR APPLICATION THAT WILL AFFECT THE EMPLOYEE’S FINANCIAL INTERESTS
PERSONAL RELATIONSHIPS
AVOID APPEARANCES OF FAVORITISM

- A NOAA EMPLOYEE MAY NOT WORK ON A GRANT OR APPLICATION OF AN ORGANIZATION IN WHICH THE EMPLOYEE IS ACTIVE OR HOLDS A POSITION
GIFTS
AVOID UNDUE INFLUENCE

• A NOAA EMPLOYEE MAY NOT ACCEPT A GIFT FROM A GRANTEE, UNLESS AN EXCEPTION APPLIES, SUCH AS:
  - A GIFT OF $20 OR LESS
  - AN INVITATION TO A “WIDELY-ATTENDED GATHERING”
GIFTS
AVOID UNDUE INFLUENCE

• A NOAA EMPLOYEE MAY NOT ACCEPT A GIFT ON BEHALF OF NOAA, SUCH AS A TRAVEL GIFT, FROM A GRANTEE OR GRANT APPLICANT
OUTSIDE ACTIVITIES
AVOID DIVIDED LOYALTIES

• A NOAA EMPLOYEE MAY NOT ACCEPT EMPLOYMENT WITH, OR PROVIDE VOLUNTARY SERVICES TO, AN ORGANIZATION, INCLUDING A GRANTEE, WITH MATTERS BEFORE THE EMPLOYEE’S OFFICE
USE OF GOVERNMENT RESOURCES
AVOID MISUSE OF RESOURCES

• NEITHER A NOAA EMPLOYEE NOR A GRANTEE MAY USE GOVERNMENT RESOURCES FOR ANYTHING OTHER THAN AUTHORIZED PURPOSES
SEEKING EMPLOYMENT WITH A GRANTEE
AVOID DIVIDED LOYALTIES

- A NOAA EMPLOYEE MAY EXPLORE EMPLOYEE WITH A GRANTEE, BUT MUST STOP ALL WORK ON THE GRANT WHILE EMPLOYMENT DISCUSSIONS ARE ONGOING
RESTRICTIONS AFTER LEAVING GOVERNMENT SERVICE
AVOID MISUSE OF POSITION

• A NOAA EMPLOYEE MAY WORK FOR A GRANTEE AFTER LEAVING FEDERAL SERVICE, BUT:
  - MAY NOT CONTACT NOAA ABOUT GRANTS THE EMPLOYEE WORKED ON
  - MAY NOT DISCLOSE NON-PUBLIC INFORMATION
RESTRICTIONS ON A FORMER GRANTEE WORKING FOR THE GOVERNMENT

• A GRANTEE MAY WORK FOR THE GOVERNMENT AFTER LEAVING THE GRANTEE ORGANIZATION, BUT CANNOT WORK ON ANY MATTERS IN WHICH THE ORGANIZATION IS A PARTY FOR ONE YEAR, UNLESS SPECIAL AUTHORIZATION IS GIVEN
HAVE QUESTIONS?  
NEED ADVICE?

- CONTACT:  
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