



## **2025 DHA Leader Led Annual Ethics Town Hall Sal Maida, DHA General Counsel**

**Briefer: Laurie P. Rafferty, DHA Ethics Official  
December 3, 2025**



# Rules of Engagement



Microphones will be muted. We anticipate many participants.



When possible, questions submitted in the Q&A will be answered during the training. If questions that are missed, the Ethics Branch will address them through Q&A, which will be found on the Ethics Resource page on infoHub.



This training is interactive. Be ready to answer the questions and to ask your own questions.



# Leader



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## Salvatore M. Maida, J.D.

Deputy Designated Agency Ethics Official  
and General Counsel  
Defense Health Agency



## Salvatore M. Maida, J.D.



- Mr. Maida assumed his current responsibilities as the Defense Health Agency (DHA) Acting General Counsel in December 2019 and was appointed as the General Counsel in March 2020. Mr. Maida first joined the DHA Office of General Counsel (OGC) in June 2019 as the Deputy General Counsel for Military Medical Treatment Facility (MTF) Operations and worked on a variety of legal issues to include preparing for the transition of the MTFs to the administrative control of the DHA and the reorganization of DHA OGC to meet expanded requirements. The DHA is responsible for managing the integrated military health care system for approximately 9.5 million active-duty service members, their families, and military retirees, and administers the multi-billion-dollar TRICARE contract.
- From 2014 to 2019 Mr. Maida was the Director, Medical-Legal Affairs, at the Navy Bureau of Medicine and Surgery. In that capacity, he was the senior health law attorney in the Department of the Navy and principal legal advisor to the Navy Surgeon General and Bureau of Medicine and Surgery.
- Prior to beginning his career of civilian government service, Mr. Maida served 20 years in the Navy in various legal and non-legal positions, including as a Surface Warfare Officer, Senior Trial Counsel, Command Judge Advocate of an aircraft carrier, Staff Judge Advocate at the Bureau of Medicine and Surgery, and the Deputy Director of the Navy General Litigation Office.
- Mr. Maida received his law degree from Wake Forest University School of Law. He received his Master of Laws from the University of Virginia School of Law and a Masters in Business Administration from Villanova University. He received his undergraduate from Norwich University. Mr. Maida is a member of the North Carolina State Bar.
- Mr. Maida has received the following awards for government and military service: Department of the Navy Superior Civilian Service Award, 2019; American Bar Association Outstanding Military Lawyer of the Year; 2007; Legion of Merit; 2013, Meritorious Service Medal (2 Awards), 2008, 2014; Navy and Marine Corps Commendation Medal (3 awards), Navy and Marine Corps Achievement Medal (3 awards); and multiple unit and campaign awards.



**Briefer**



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**Laurie P. Rafferty, J.D.**  
Ethics Official  
and Associate General Counsel  
Defense Health Agency



## Laurie P. Rafferty, J.D.



- Laurie Powell Rafferty is an ethics attorney for the Defense Health Agency (DHA). She has held this position since 2009. Prior to DHA, Laurie was an ethics attorney for the U.S. Department of Commerce, the National Aeronautics and Space Administration, and the U.S. Office of Government Ethics.
- She has given numerous presentations on the Criminal Conflict of Interest Statutes and the Standards of Conduct regulation, and reviewed tens of thousands of financial disclosure reports.
- Laurie also practiced in the Employment and Labor Law area for the Defense Contract Audit Agency, the Resolution Trust Corporation, and the Commerce Department.
- Prior to her Government service, Laurie worked for a small, private law firm in Washington, DC. Laurie graduated from the College of William and Mary in Virginia with an AB in English, and the George Mason University School of Law with a JD.
- She is a member of the Virginia, Maryland and District of Columbia Bars.



# Disclosures



- Mr. Maida and Ms. Rafferty have no relevant financial or non-financial relationships to disclose relating to the content of this activity.
- The views expressed in this presentation are those of the author and do not necessarily reflect the official policy or position of the Department of War, nor the U.S. Government.
- This continuing education activity is managed and accredited by the Defense Health Agency J-7 Continuing Education Program Office (DHA J-7 CEPO). DHA J-7 CEPO and all accrediting organizations do not support or endorse any product or service mentioned in this activity.
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# Learning Objectives



At the conclusion of this activity, participants will be able to:

1. Recognize why speaking requests can be problematic.
2. Articulate why gifts are an ethics issue.
3. Recognize a conflict of interest issue.
4. Comprehend that new DoD/DHA employees cannot participate on matters where their former non-Government employer is a party *for two full years*.
5. Discuss generally what conduct the Post Government Employment restrictions prohibit.
6. Summarize when to disqualify when seeking employment.





# Topics in Ethics

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- Financial Conflicts of Interest
- Appearances of Bias
- Gifts, Bribes & Salary Supplementation
- Outside Employment & Activities
- Political Activities
- Misuse of Government Position & Resources
- Seeking Employment & Post-Government Employment



## Public Service



“The success of this Government, and thus the success of our Nation, depends in the last analysis upon the quality of our career services.” –John F. Kennedy



# 14 Principles of Federal Ethical Conduct

1. Place loyalty to Constitution above private gain
2. Financial interests cannot conflict with official duties
3. Cannot use non-public information for private gain
4. No gifts from prohibited sources
5. Put forth honest effort in performance of your duties
6. No unauthorized promises to bind the Government
7. Cannot use public office for private gain
8. Act impartially and no preferential treatment
9. Protect and conserve government property and only use it for authorized purposes
10. No outside employment or job hunting that conflicts with your job
11. Duty to disclose waste, fraud, and abuse
12. Satisfy financial obligations in good faith
13. Uphold EEO laws and regulations
14. Avoid appearance of unethical conduct/violating the law or ethics regulations



# Ethical Decision Making



## Should I?

Would it create  
an appearance  
issue?

## Can I?

Can I engage in  
a proposed  
action?

Do the ethics  
rules permit it?

Would I appear to be less  
than fair and impartial or  
cause a reasonable  
person to question the  
integrity of DHA programs  
and operations?



## Scenario



LTC Stephany Curry, Chief of a Clinical Practice at an MTF, has relentless energy and engages with staff, education programs, and professional outside entities to enhance her performance and that of her staff and team.





## Question 1



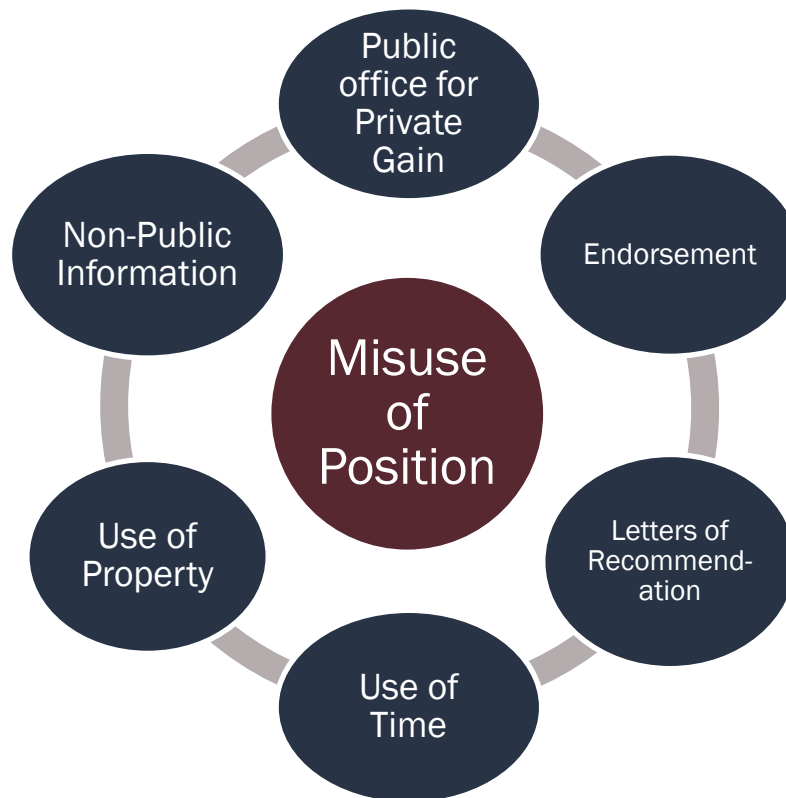
LTC Curry's alma mater medical school has offered her the opportunity to speak in her personal capacity about her military medical experience. The school wants to use her name, rank, and biography as part of their fundraising materials.

May she speak at this event in her personal capacity? May the school use her military association in their fundraising materials?





# Misuse of Position





# Misuse of Position



Public Office for Private Gain	Endorsement	Letters of Recommendation
<p>Personnel may not use their DoD position for their own private gain or for the private gain of friends, relatives, or organizations with which the official is affiliated, including nonprofit organizations which support the mission of DoD. 5 CFR § 2635.101(b)(7).</p>	<p>Personnel may not use or allow the use of their DoD position or title or any authority associated with their DoD position or title to endorse a non-federal entity, its services or products. 5 CFR § 2635.702(c).</p>	<p>Personnel may use their official titles on letters of recommendation <u>only</u> in response to a request for an employment recommendation or character reference:</p> <ul style="list-style-type: none"> <li>• based upon personal knowledge of the ability or character of an individual with whom they have dealt in the course of Federal employment, <u>or</u></li> <li>• whom they are recommending for Federal employment.</li> </ul> <p>5 CFR § 2635.702(b).</p>





## Misuse of Position



Use of Time	Use of Property	Non-Public Information
<p>Personnel shall use official time in an honest effort to perform official duties. 5 CFR § 2635.101(b)(9).</p>	<p>Personnel have a duty to protect and conserve Government property and may not use Government property, or allow its use, for any purpose other than the purpose for which it is authorized. 5 CFR § 2635.101(b)(9).</p>	<p>Personnel may not use or allow the use of nonpublic Government information to further their own private interests or the private interests of others. 5 CFR § 2635.703.</p>

When speaking in your personal capacity, you may include your DHA title or position in relation to your speech as one of several biographical details, provided that your title or position is given no more prominence than other significant biographical details.  
5 CFR § 2635.807(b).



## Misuse of Position/Speaking

She may speak in her personal capacity, and she may include her military association as part of her biography.

However, the medical school may not use her official position to fundraise, as LTC Curry would be using her public office for the private gain of a NFE.



## Question 2



LTC Curry serves as the Secretary of Ace Professional Association (Ace PA) in her private capacity on her personal time. Ace PA is made up of active and retired military medical providers who are focused on enhancing their practice area. As Secretary of Ace PA, she is helping set up the upcoming annual conference. LTC Curry thinks the conference would be very beneficial to her staff and hopes many of them can attend.

May LTC Curry decide which of her staff attends the annual conference?





# Conflict of Interest



## Consider:

- 18 U.S.C. § 208 – Conflict of Interest statute that prohibits you from taking official action in your Government job on a matter that involves an entity where the employee serves as an officer, director, trustee or employee.
- 5 CFR § 2635.502 – An employee may not take official action if a reasonable person with knowledge of relevant facts would question their impartiality based on a financial interest of a covered relationship (member of household, contractual relation, partnership or fiduciary relation).
- 18 U.S.C. §§ 203 & 205 – Prohibits Federal employees from representing back to the Government on behalf of another (i.e., you may not perform work off-duty where you would represent or communicate back to the Government on behalf of a non-Federal entity).
- DHA Info Paper links on participation in professional organizations in [personal capacity](#) and official [DHA capacity](#).



## Conflict of Interest

No, LTC Curry may not decide who from her staff attends Ace PA's annual conference. There are two issues here: one under the conflict of interest statute and one under the representation statutes.

As a board member, she has a fiduciary duty to Ace PA. She is prohibited from taking any official action that could impact Ace PA, including attending the conference in her official capacity or deciding which of her staff members should attend. She may not have any official role that could arguably support Ace PA. 18 U.S.C. § 208.

LTC Curry may not represent back to the Federal government on behalf of Ace PA. Therefore, she may not invite her co-workers to attend or speak, because she would be asking on behalf of a non-Federal entity. 18 U.S.C. §§ 203 & 205.



## Question 3



Ace PA invites several of LTC Curry's staff physicians to present and attend the Ace PA annual conference that provides valuable CME credit. Ace PA offers a gift of travel, which includes airfare, hotel costs, and conference fees for everyone who is invited to speak and present at the conference.

May these speakers accept the Gift of Travel from Ace PA to attend this conference?





## Gifts From Outside Sources – Gift of Travel

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- May not solicit 31 U.S.C. § 1353 Gifts of Travel.
- Must be reviewed by an ethics official before traveling and approved by the deciding official in writing.
- Must be in the interest of the Government and in an official capacity.
- May not be for marketing purposes and may not be part of employee's statutory or regulatory responsibilities.
- Traveler may not accept direct payments—it must be in kind or paid via check to the U.S. Treasury.
- Acceptance would not cause a person with knowledge of all facts to question the integrity of DHA.
- DHA Info Paper on [Gifts of Travel](#).



## Gifts From Outside Sources – Gift of Travel

Likely yes, but LTC Curry may not be involved in approving attendance or accepting the gift of travel, as she is the President of Ace PA. As a reminder, it would be a conflict of interest for her to make official decisions about a NFE that she owes a fiduciary responsibility.

Remember, gifts of travel are a gift to the Government - not the employee.





## Question 4



MAJ Butler, one of LTC Curry's staff physicians, is approved to attend the Ace PA annual conference and provide a presentation on what he is doing and the advances they are making at the MTF. After the first day of the conference, an announcement is made that Peak Healthcare is sponsoring an evening event. There will be cocktails and light hors d'oeuvres.

May MAJ Butler attend the event?





## Gifts from Outside Sources

- **General rule:** Do not accept gifts (anything of value) given because of your *official position* or from a *prohibited source*, unless an exception applies. 5 CFR § 2635.201.
- We need to consider the following:
  - Is it a *gift*?
  - Given because of **official position** or from a **prohibited source**?
  - Should he accept the gift?
  - Is there an exception that would allow acceptance?

### What is a prohibited source?

A prohibited source is any person who does business or seeks to do business with the DHA/DoD; conducts activities regulated by the DHA/DoD; or is an organization where a majority of the members are prohibited sources.  
5 CFR § 2635.203(d).



## Gifts from Outside Sources – Exceptions & Exclusions

Modest items of food and non-alcoholic refreshments offered other than as a meal (e.g., coffee, soft drinks, donuts).

Most plaques, certificates, and trophies.

Discounts available to all Government employees or all uniformed military personnel.

Rewards and prizes given in contests or events (including random drawings) open to the public, unless your entry into the contest or event is required as part of your official duties.

Anything for which you/DHA pay market value.

Gifts valued at \$20 or less per occasion, totaling no more than \$50 in a calendar year from any one source.

Gifts clearly motivated by friendship or family relationship.

Gifts resulting from outside business activities of you or your spouse.

Free attendance or meals provided by the sponsor of the event for a widely attended gathering of mutual interest to a large number of people when a written determination of agency interest has been made.

Free attendance or meals provided by someone other than the sponsor of a widely attended gathering of mutual interest to a large number of people when more than 100 people are expected to attend, the aggregate value of the gift is under \$480, and a written determination of agency interest has been made.

5 CFR §§ 2635.203(b), 2635.204.



## Gifts from Outside Sources / Conferences

It is unlikely that MAJ Butler may attend this evening event, but it may be possible.

- Are the items gifts? Yes.
- Given because of official position or from a prohibited source? Official position.
- Should he accept the gifts? Possibly.
- Is there an exception that would allow acceptance? Possibly.

There are three potential exceptions that would allow MAJ Butler to attend the event:

- If the value of event per person is \$20 or less there is a gift exception: \$20 or less, up to \$50 in a calendar year from the same prohibited source;
- If only modest items of food (not a meal) and non-alcoholic refreshments are offered; or
- If approved in advance with legal review as a Widely Attended Gathering that is in the interest of the agency for him to attend.



# Conference Attendance

Seek guidance early as many issues can arise:

- Conflicts of interest with outside activities
- Improperly accepting travel payments
- Improperly engaging with industry
- Accepting invitations without approval
- Speaking without reviews
- Endorsing non-federal entities
- Improper acceptance of gifts



Remember, drug and medical device companies must disclose all gifts/payments to healthcare providers. See [Open Payments](#) link.

Talk to your Ethics Official or send questions: [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil)



## Question 5



Draymond, a contract nurse, works under LTC Curry in her clinic. His contractor employer has given him two tickets to a baseball game, and he cannot attend. He offers them to the clinic staff on a first come first serve basis. Each ticket has a face value price of \$55.

May a member of the staff accept these tickets?





## Gifts from Outside Sources

- **General rule:** Do not accept gifts (anything of value) given because of your official position or from a *prohibited source*. 5 CFR § 2635.201.
- We need to consider the following:
  - Is it a *gift*?
  - Given because of official position or from a prohibited source?
  - Should they accept the gift?
  - Is there an exception that would allow acceptance?
- DHA Info Paper on [Gifts from Outside Sources](#).

It is never permissible to accept a gift in return for being influenced to make an official act – this is bribery!  
18 U.S.C. § 201  
(Criminal Statute)



## Gifts from Outside Sources

No, staff may not accept this gift from Draymond.

- Is it a *gift*? Yes.
  - Given because of official position or from a prohibited source? Yes.
  - Should they accept the gift? No.
  - Is there an exception that would allow acceptance? No (not with these facts).
- 
- ✓ There is an exception that allows employees to accept gifts of \$20 or less, up to \$50 or less, in a calendar year from prohibited sources. Here, the value of the gift is above the \$20 threshold, so this exception does not apply. 5 CFR § 2635.203(a).
  - ✓ There is a personal relationship exception, but that is unlikely to apply either. Even if staff considers Draymond a friend, their primary relation with him is professional and without other facts this does not meet that exception. Also, it is important to recall that the contractor paid for the tickets. 5 CFR § 2635.203(b).





## Question 6



MAJ Butler is beginning to work on a clinical investigation with several private health care companies, to include Acme Health. His spouse has an IRA stock in a few different companies, including \$20,000 of stock in Acme Health, a private health care company.

Will this impact how MAJ Butler proceeds with the clinical investigation?





# Conflict of Interest



- The basic criminal conflict of interest statute, 18 U.S.C. § 208, prohibits Government employees from participating personally and substantially in official matters where they have a financial interest.
- It also imputes to them the financial interests of their spouse; minor child; general partner; organization in which they are serving as officer, director, trustee, general partner or employee; or any person or organization with whom they are negotiating or have an arrangement concerning prospective employment.





# Conflict of Interest



Employee is  
assigned to a  
“particular  
matter”



Particular  
matter will affect  
the employee's  
personal  
financial interest



Employee may  
not participate  
personally and  
substantially in  
the “particular  
matter”

MAJ Butler begins to  
work on this clinical  
investigation with  
Acme Health.



Spouse has stock in  
Acme Health. MAJ  
Butler's participation  
in the clinical  
investigation will  
impact his spouse's  
financial interest.



MAJ Butler may not  
participate  
personally and  
substantially in this  
clinical investigation



## Conflict of Interest

MAJ Butler's ability to work on this task is impacted because his spouse owns stock in Acme Health. MAJ Butler may not take official action on a matter if he, his spouse, or his minor child have a financial interest that will be affected by the matter. 18 U.S.C. § 208. Because his spouse has \$20,000 of stock in this company, and his spouse's interests are imputed to him, he may not take official action on this matter and may not participate in the clinical investigation. Working on this matter would violate the conflict of interest criminal statute at 18 U.S.C. § 208.

Note: There is an exemption for stock interests of under \$15,000 in 5 CFR § 2640.202. However, MAJ Butler's spouse's interest is over this de minimis exemption.



## Question 7



LTC Curry greatly appreciates the work of everyone at the MTF and wants to ensure that she supports nurses week this year. Her team is going to raise funds by selling donuts in the morning before shifts just outside her clinic to fund a lunch for the nurses.

Is this permitted?





# Fundraising



- CFC or OPM approved Disaster Fundraisers
- By Our Own, For Our Own - Exception to Fundraising
  - DoD members may fundraise for their own members if approved by the MTF Director, with Ethics Official review, provided:
    - ✓ Personnel are not ordered, coerced or compelled to participate or give;
    - ✓ Authorization for use of time and resources is limited in scope and duration and complies with applicable laws;
    - ✓ Contractors may not be solicited for donations or allowed to participate; and keep contractors off any email distributions;
    - ✓ Contributions are not tracked, except for accounting for funds.

(JER 2-400 – 402)

DHA Info Paper on [Fundraising in the Workplace](#)



## Fundraising



Yes, this is exactly what the JER 2-401 refers to that permits organizations to internally fundraise to support their own personnel. This must still be reviewed by an ethics official and approved by the MTF Director.

### *Remember.*

- Location of fundraising must be outside of work area, but within organization's area (i.e., within Surgery, J1 or Family Practice).
- Don't advertise through email or intercom when it will reach contractors and patients and members outside the org.



## Question 8



Lisa, a DHA civilian Contracting Officer. She came to DHA 15 months ago from Acme Health Care. ACME Health Care has a current DoD contract and is looking to contract directly with DHA.

Lisa's supervisor tasked her with serving as the Contracting Officer for the new contract that ACME Health Care is hoping to win. Is this a problem?







## Former Employer



Impartiality Regulation (5 CFR § 2635.502)	§1117 of the FY 2022 NDAA
<p>For <u>one year</u> after serving as an employee, officer, director, trustee, general partner, agent, attorney, consultant, or contractor, you may not participate personally and substantially in any particular matter involving specific parties where that non-Federal entity is, or represents, a party to the matter, unless you first receive a written authorization.</p>	<p>For <u>two years</u> after serving as an employee, officer, director, trustee, or general partner with a non-Federal entity, DoD employees are prohibited from participating personally and substantially in a particular matter involving specific parties where that non-Federal entity is, or represents, a party to the matter, unless you first receive written authorization.</p>
<p>This restriction applies to all employees in the Executive Branch.</p>	<p>This restriction only applies to employees of the DoD.</p>

Note: The impartiality regulation also applies to numerous other categories (e.g., a member of your household; a relative with whom you have a close relationship; a current outside employer; a spouse, parent, or child's employer).



## Former Employer



Yes, this is a problem. The impartiality regulation no longer applies because Lisa left Acme Health Care over a year ago. However, § 1117 of the FY 2022 NDAA lasts for two years. Therefore, Lisa may not participate in this task.



## Question 9



Lisa is planning on leaving Federal service to return to the private sector. She is taking her time to figure out her next step and is in no rush to leave.

- Apex Health, a DHA contractor, hears that Lisa is planning on leaving DHA and offers her a lucrative position. Lisa tells Apex Health that she will think about the offer. Lisa served as the Contracting Officer for Apex Health's current contract with the MTF, but there are no current solicitations pending with Apex Health.
- Lisa also posted her resume on LinkedIn to see if any other companies would be interested in hiring her.

Does Lisa have to do anything?



# What is “seeking employment”?

- Seeking employment is:
  - making an unsolicited communication to a prospective employer (or the prospective employer’s agent or employee) regarding potential future employment;
  - engaging in negotiations for employment; or
  - responding to an unsolicited communication from a prospective employer (or the prospective employer’s agent or employee) regarding possible employment (other than rejecting the possible employment).

5 CFR § 2635.603(b).

DHA Info Paper on [Seeking Employment](#).



# Seeking Employment & Post-Government Employment

## Seeking employment includes:

- Sending a resume to a prospective employer.
- Sending your resume to a recruiting agency and the recruiting agency has notified you that a specific prospective employer is interested in or considering your application.
- Asking a former colleague if they have any openings at their company.
- Starting negotiations with a prospective employer about a job offer.
- Receiving a verbal offer to work for a NFE and saying nothing.
- Receiving an offer to work for a NFE and saying you will consider it.

## Seeking employment does not include:

- Requesting a job application.
- Posting your resume on LinkedIn or similar professional network sites.
- Sending your resume to a recruiting agency.
- Asking for a job application, but you have not submitted the application yet.
- Receiving an email asking if you are interested in a job, but you have not responded yet.
- Receiving an offer from an NFE and clearly rejecting the possibility of employment.



# Seeking Employment



## What must you know when looking for post-DHA (non-Federal Government) work?

Get advice as soon as you are thinking about sending resumes/meeting/discussing opportunities with a prospective employer.

- Your impartiality may be questioned – it can start with sending a resume.
- You may have a conflict of interest when negotiating (this starts much earlier than employees think!).

Get advice early!



## Seeking Post-Government Employment

Lisa is seeking employment with Apex Health, because she received an offer to work for Apex Health and said she would think about it. Her impartiality could be questioned, and she has an imputed financial interest in Apex Health. She must alert her supervisor and recuse herself in writing from taking any actions involving Apex Health.

Lisa is not seeking employment when she posts her resume on LinkedIn, unless someone reaches out to discuss an opportunity. She does not need to do anything at this time.



# Post-Government Employment

## What must you know when looking for post-DHA (non-Federal Government) work?

The **representation bans** limit what you may do for prospective employers, not who you may work for.

- Lifetime Ban – 18 U.S.C. § 207(a)(1) - Personal and substantial participation in a particular matter bars employee from representing back on that matter.
- Two-Year Ban – 18 U.S.C. § 207(a)(2) - Supervise someone who is personally and substantially participating in a particular matter – barred from representing back on that matter.

**DHA Senior Officials** (GO/FO/SES) have additional restrictions: One-Year Cooling Off Period; Section 1045, NDAA FY 2018 Restriction; One Year Advice Ban; AGEAR System.

**Emoluments Clause** – Retired military may not represent foreign governments without Service Secretary's approval.





## Post-Government Employment

### What must you know when looking for post-DHA (non-Federal Government) work?

**Procurement Integrity Act** prohibits you from receiving any compensation for a year from a company if you participated in the award of a contract over \$10 million for that company as defined by 41 U.S.C. § 2104.

If you were involved in contracts over \$10 million, you may need to file a post government employment request in the **After Government Employment Advisory Repository (AGEAR)** system. Section 847, for the FY 2008 NDAA.

DHA Info Paper on [Post-Government Employment](#)



## Question 10



LTC Curry decided to retire just after reaching 20 years. Her staff decided to pitch in and buy her a shadow box with all her medals that cost \$500.

Is that OK?





# Gifts Between Personnel



**General Rule:** Personnel may not give, donate to, or ask for contributions for a gift to an official superior.

An official superior includes your immediate boss and anyone above your boss in the chain of command.

5 CFR § 2635.301.

DHA Info Paper – [Gifts Between Employees](#).

## Two Exceptions

**Occasional Basis.** (e.g., holidays, birthdays)

- ✓ Non-cash gifts of up to \$10
- ✓ Personal hospitality provided at a residence
- ✓ Appropriate host/hostess gift or
- ✓ Food or refreshments shared in the office

**Special Infrequent Occasions.** (e.g., marriage, illness, birth of child)

- ✓ Gift that is appropriate to the occasion
- ✓ Solicited contributions may not exceed \$10
- ✓ Group gifts that do not exceed \$480 are permitted

Always reach out to an ethics official before organizing a group gift!



## Gifts Between Personnel

We must evaluate it:

- Is it a gift? Yes
- Is it given to a superior? Yes
- What exception applies to retirement? Special Infrequent Occasion
- Is it a group gift? Yes
- Are group gifts okay for retirements? Yes, subject to limitations.
- Is the value of the group gift under \$480? No
- Is there an exception that would allow acceptance? No

The answer is NO. Employees may not pool together money for a gift for a supervisor that exceeds \$480. Always seek ethics advice for group gifts. There is no “buy down” provision, so supervisor must return or pay the entire \$500. For group gifts, always seek advice from an ethics official or [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil).



## Hatch Act / Political Activities



**True or False?** Lisa (a DHA civilian employee) may have “Vote Democrat” or “Vote Republican” sticker on her office wall.

**True or False?** MAJ Butler and Lisa may have a single bumper sticker on their cars in support of a current candidate who is running for a partisan political elected office.

**True or False?** LTC Curry may share a political fundraising statement on social media while on her personal phone on the weekend.

**True or False?** Advocating for or against gun control on a Government computer with a co-worker is a violation of the Hatch Act.



## Political Activity



Are you interested in engaging in partisan political campaign activity?

### Considerations

Seek advice!



- ✓ What is considered partisan political campaign activity?
- ✓ What are you prohibited from doing?
- ✓ Are you less or further restricted? What can you do?

DHA Info Paper on [Hatch Act](#).

DoD FAQ on [Political Activities for Military](#).



## Political Activity



- All military members and civilians are prohibited from:
  - Engaging in partisan political campaign activity in the workplace or while on duty (or appearing to be on duty);
  - Fundraising for partisan candidates or parties at any time--24 hours per day, seven days per week (24/7); and
  - Using at any time (24/7) official authority or influence to affect the outcome of an election.
- Additional Restrictions:
  - Further restricted' employees (SES) and active-duty military members also have a 24/7 prohibition on engaging in political activity (campaigning) for a partisan group or candidate.
  - Military members may not give speeches at partisan event, nor may they wear their uniform at any political event.



## Political Activity



- Lisa (a DHA civilian employee) may have “Vote Democrat” or “Vote Republican” sticker on her office wall. FALSE.
- MAJ Butler and Lisa may have a single bumper sticker on their cars in support of the current candidate who is running for a partisan political elected office. TRUE.
- LTC Curry may share a political fundraising statement on social media while on her personal phone on the weekend. FALSE.
- Advocating for or against gun control on a government computer with a co-worker is a violation of the Hatch Act. FALSE.





# Important Points



Supervisors have a critical role in ethics to help their employees navigate issues.



Take advantage of the ethics resources/seek guidance from ethics counselors. Ask before you act.



The goal is to avoid ethical failure, but when there are violations of the rules and law it is your responsibility report them.



The success of DHA and DoD depends on a strong foundation of integrity – **EVERYONE** has a part.



## Helpful Resources



You have completed your live, interactive DHA Annual Ethics Training. A certificate of completion may be obtained by accessing your JKO Account. *Please allow up to 14 days for staff to input rosters.*

- If you have questions, ask your local DHA ethics counselor who can be found at: [DHA Ethics Resources](#)
- To find our information papers, visit: [DHA Ethics Resources](#)
- Inquiries can also be sent to: [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil)



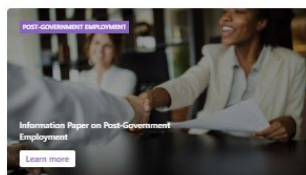
# Ethics Resources Page



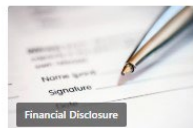
## DHA Ethics Resources

Welcome to the OGC Ethics Office Resource Page. The DHA Ethics Office is a division of the DHA Office of General Counsel. Sal Maida is the General Counsel and the Deputy Designated Agency Ethics Official for DHA. The DHA Ethics Branch administers the ethics program along three main lines of effort: providing ethics advice and counsel to DHA personnel, implementing training, and managing the financial disclosure program.

Find the information you need on this page or reach out to your assigned Ethics Official by using the selector below. You can always reach out to our central inbox ([DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil)) and you will receive a response.



Information on mandatory ethics training sessions for new employees and financial disclosure filers and other ethics training opportunities.



Information on OGE-450 and OGE-278 Financial Disclosures - for filers, supervisors, and HR POCs.



Document library for resources and frequently asked questions on ethics matters.

Whenever in doubt, reach out to a delegated ethics attorney for advice.

You can find the attorney serving your MTF by expanding the Ethics Official List (---) or reach out to our central inbox at: [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil).

TIP: To search for your MTF expand the DHNs you would like to search, and use Find in Page (Shortcut: Ctrl-F) to search for the MTF name

### Ethics Official List

[See all](#)

Edit in grid view Share Copy link

Ethics Attorney List by DHA

	Attorney Name	Attorney Email	MTF Names	State/Country
>	DHR: DHRQ (5)			
>	DHN: DHN 1 Indo-Pacific (6)			
>	DHN: DHN 2 Pacific Rim (4)			
>	DHN: DHN 3 West (3)			
>	DHR: DHN 4 Central (9)			

Visit the [Ethics Resources](#) page on DHA InfoHub to find:

- Your ethics attorney
- Information papers
- Q&A by topic
- Training opportunities
- Financial disclosure information

Inquiries can also be sent to the duty attorney: [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil).



# References



- [14 Principles of Ethical Conduct](#), 5 C.F.R. § 2635.101b
- [Criminal Statutes](#), 18 U.S.C. §§ 201-209
- [5 C.F.R. Part 2635](#), Standards of Ethical Conduct for Employees of the Executive Branch
- [5 C.F.R. Part 3601](#), Supplemental Standards of Conduct for Employees of the DoD
- [DoD Joint Ethics Regulation \(JER\) \(May 15, 2024\)](#)

[Department of Defense Standards of Conduct Office > Ethics Program Resources > Ethics Laws and Regulations \(osd.mil\)](#)



# How to Obtain CE/CME Credit



## 2025 Annual Ethics Training Town Hall – December 3, 2025

To claim CE/CME credit for this activity, complete the evaluation survey and posttest before the evaluation period ends on **December 17, 2025, at 11:59 PM Eastern Time.**

1. Go to the continuing education registration page at <https://www.dhaj7-cepo.com/content/2025-annual-ethics-training-town-hall-%E2%80%93-december-3-2025>
2. On the registration page, click “Register,” then click log in or create an account (if not already logged in).
3. Once logged in, enroll and proceed to complete the evaluation survey and posttest.

Once you have been awarded credit, you can download your certificate anytime through [your account](#). Any activity you register for but have yet to complete will be available under your [pending activities](#) until the evaluation period ends.

**Questions?** Email the DHA J-7 Continuing Education Program Office at [dha.ncr.j7.mbx.cepo-cms-support@health.mil](mailto:dha.ncr.j7.mbx.cepo-cms-support@health.mil).



# Test Your Ethics Knowledge – Answers to Questions on Slides

1. It is never permissible to endorse a non-Federal entity (private organizations, professional organizations, and companies) when speaking in your official DHA or Service capacity.
2. You may accept the donuts and coffee at conferences even if hosted by the health care industry as snacks and non – alcoholic drinks are not considered a gift.
3. As long as there is no appearance issue, you may accept a gift from a DHA contractor if the value of the gift is \$20 or less.
4. You sent your resume last week to a particular company with which you work on matters at DHA. You are seeking employment and could have an impartiality concern.
5. You are working on an agreement at DHA and are interviewing with the organization that is negotiating the agreement. You may have a conflict of interest and must seek ethics advice.
6. You may give your supervisor a birthday gift, but it must be \$10 or less.
7. You are not permitted to engage in fundraising for a partisan candidate or political party either on or off duty.
8. You cannot be disciplined, if you seek advice from an Ethics Official in advance of acting, you provide the relevant facts, and you follow their advice.

***All these are true statements.*** Please reach out to an Ethics Official or [DHA-OGCEthicsOffice@health.mil](mailto:DHA-OGCEthicsOffice@health.mil) if you have questions.



# Final Slide



- Thank you for attending ethics training today.
- Remember, if there is any question that an action you intend to take comports with the law, then ask before you act.
- And be careful out there!