



DHA Leader Led Annual Ethics Training – 2026 DHHQ

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Associate General Counsel, Ethics Branch, OGC

August 18, 2026



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.



Disclosures



- Ms. Rafferty has no relevant financial or non-financial relationship(s) relating to the course content or with ineligible companies to disclose. 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.
- DHA J-7 CEPO staff, as well as activity planners and reviewers have no relevant financial or non-financial relationship(s) with ineligible companies to disclose.
- Commercial support was not received for this activity.



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 in 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.



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



Training Scenarios



LTC Athos, a Pharmacy Branch Chief at a DHA, receives an invitation to attend the Annual Pharmacy Summit hosted by the American Association of Pharmaceutical Companies (AAPC), a pharmaceutical association in Los Angeles, California.

- The 4-day Summit brings together personnel from across government, nonprofit and for profit, academic, medical and pharmaceutical researchers and clinicians.
- The majority of attendees and speakers come from US companies and research facilities. There will be many vendor booths and speakers from industry. Virtual attendance will not be an option.





Question 1



AAPC offers LTC Athos airfare and lodging to speak about the DHA pharmacy program. She is also offered free attendance on the days she does not speak.

- LTC Athos asks her boss if she may accept this gift of travel in her official capacity. May she?

Yes or No.





Gifts of Travel - Requirements

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](#).



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



Answer to Question 1

Yes

- LTC Athos may accept a gift of travel from this organization if there is no conflict of interest, her travel approval authority (TAA) approves this in writing with an ethics official review. Her TAA must determine it is in the interest of the agency for her to travel in her official capacity and accept this travel gift.





Question 1, Continued . . .



- What if LTC Athos is also currently serving a one-year term as a *board member* for AAPC in her personal capacity?

Yes or No.





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.





Answer to Question 1, Continued . . .

As a board member (someone with management authority), LTC Athos would have a fiduciary duty to AAPC.

- Therefore, if LTC Athos was serving a one-year term unpaid board for AAPC, she could not attend and speak in her official capacity. She would also have to recuse herself from taking ANY official action on matters pertaining to AAPC.
- This is a conflict of interest with her fiduciary responsibility to AAPC as a Board member, 18 U.S.C. § 208(a), and a misuse of her official position.





Question 2



MAJ Porthos, who works for LTC Athos, is also attending. He eagerly engages all the vendor tables, and by the end of the first day is loaded with swag.

- Can he accept swag with a *total value* from all the vendors that exceeds \$100?
- What if one of the vendor gives a pair of sunglasses valued at \$25 and he knows that vendor is competing for a grant from his office?
- What if the same vendors invite MAJ Porthos to attend an after hour social event (beyond appetizers and hors d'oeuvres) open to all conference attendees?





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/DoW; conducts activities regulated by the DHA/DoW; or is an organization where a majority of the members are prohibited sources. 5 CFR § 2635.203(d).



Gifts from Outside Sources – *Exclusions (not a gift)*

Exclusions - Not Considered A Gift

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.

Free attendance when speaking in official capacity.

Anything for which you/DHA pay market value.

5 CFR §§ 2635.203(b), 2635.204.



Gifts from Outside Sources – *Exceptions (an excepted gift)*

Exceptions that Permit Acceptance

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.

Bona fide awards for meritorious service.

Offer of free attendance and/or meal at a widely attended gathering (WAG) when:

- Attendance is in the interest of the agency;
- There are a large number of persons attending with a diverse interest; and
- Written approval from supervisor with ethics official review.

Information materials that cost less than \$100.

5 CFR §§ 2635.203(b), 2635.204.



Answer to Question 2



Can MAJ Porthos:

- **Accept swag with a total value from all the vendors that exceeds \$100?** Yes, as long as none of the gifts exceeded \$20 and the total for any one vendor does not exceed \$50 in a year. But always keep in mind appearances.
- **What if one of the vendor gives a pair of sunglasses valued at \$25 and MAJ Porthos knows the vendor is competing for a grant from his office?** No, the sunglasses exceed \$20 and are from a prohibited source.
- **May he attend a social event if one of the vendors invites him?** No, unless the fair market value cost is less than \$20, and if more, he pays full market value, or he receives written approval in advance of attending from his supervisor with an ethics official review to attend a widely attended gathering (WAG).



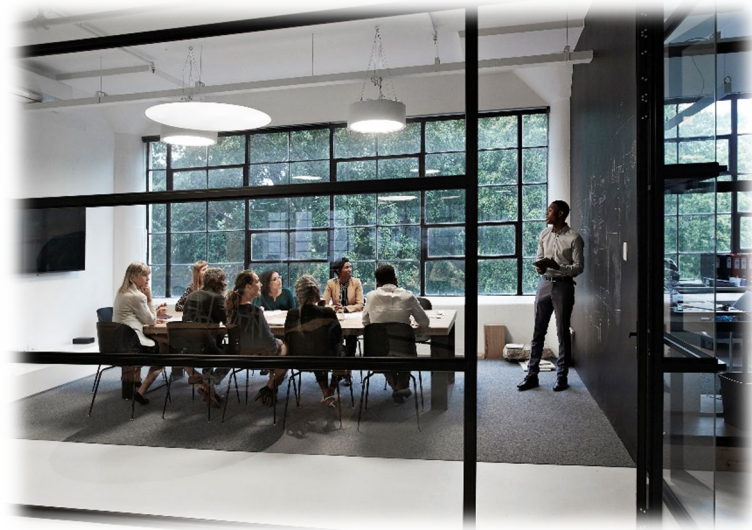


Question 3



- CAPT Aramis, a research chemist, will be leaving the military soon and is seeking a new job. During the AAPC Summit, he is asked by a former DHA official, who now works for a major drug company, if he is interested in working for them after he retires next year.
- At this time, CAPT Aramis is sitting on a Source Selection Evaluation Board for a multi-million-dollar contract. This major drug company is one of the bidders. Must CAPT Aramis take any action?

Yes or No.



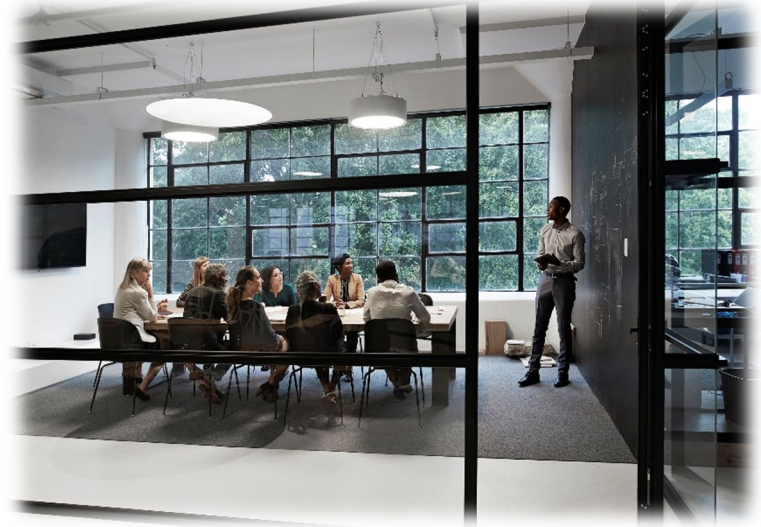


Answer to Question 3



Yes

41 U.S.C. Section 2103 (commonly referred to as the Procurement Integrity Act) requires individuals serving on source selection boards to immediately report contacts from a bidder about possible post-Government employment in writing to the supervisor and DAEO, recuse themselves from the activity, and reject the employment offer.





Question 4



CAPT Aramis properly reports the offer of employment and declines the offer. Later in the conference, he is approached by another company, MedTech, a DoW contractor, about post-Government employment. CAPT Aramis supervises many employees who have contracting responsibilities, but none of those contracts involve MedTech. The Source Selection Board he served on was for a 25-million-dollar contract.

May he accept the offer?





Post-Government Employment



What laws impact your 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](#)



Answer to Question 4



CAPT Aramis may accept the offer. He is not barred from representing back to DHA on MedTech's behalf on any contract because he did not personally and substantially participate in any contract and he did not supervise anyone who worked on a MedTech contract. 18 U.S.C. § 207(a)(1) and (2).

- However, *because he served on the SSEB within the last two years on a contract over \$10 million and MedTech is a DoW contractor, he must get a written opinion through the AGEAR system before he can accept any compensation.*
- But note, he may not represent back when he is on terminal leave. (18 U.S.C. § 203)





Question 5



- LTC Athos is approved to accept a gift of travel offered by AAPC to attend and speak at the conference in her official capacity (she is not a board member in this scenario).
- During the conference, she is asked if she would ever consider coming to work for DrugsRUs. LTC Athos is contemplating retiring within the next year and believes she can continue researching drug interactions with DrugsRUs, so she says *maybe*.
- Later that week LTC Athos hears of another upcoming DrugsRUs event. She is asked to approve two of her subordinates' gifts of travel offered by DrugsRUs to this upcoming event. May LTC Arthos approve those gifts of travel?



Yes or No



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 by rejecting the offer.



5 CFR § 2635.603(b).

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



Seeking 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.



Answer to Question 5



NO

- LTC Athos is currently 'seeking employment' with DrugsRUs because she did not decline the offer. As a result, her impartiality could be questioned, so she must recuse herself from taking any official action at DHA regarding DrugRUs or seek a written authorization through her supervisor and an ethics official.
- Note: if she is negotiating for employment, it is a statutory conflict of interest in violation of 18 U.S.C. § 208, she must recuse herself. Waivers are extremely rare





Question 6



Ms. D'Artagnan, a DHA civilian researcher, has also been invited to brief at the summit. She is a retired Army colonel who works in the Pharmacy Operations Division under LTC Athos's supervision.

- On the second day of the conference, she offers to take LTC Athos out to lunch. Even though she works for LTC Athos, Ms. D'Artagnan sees herself as a mentor to all the pharmacists in the division.
- LTC Athos has been so busy at work that she has not gotten to know Ms. D'Artagnan well and she is wondering whether she should accept the invitation so she can get to know her subordinate better?

Yes or No



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 \$525 are permitted

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



Answer to Question 6



No

- LTC Athos is the supervisor, and she may not accept a gift from her subordinate.
- There is a \$10 exception for gifts given on an occasional basis like birthdays and holidays which this may or may not be, but it is unlikely a lunch is \$10 or less, and she cannot pay the difference.
- She can go to lunch, but she and Ms. D'Artagnan should each pay for their own dinner.



Question 7



LTC Athos, MAJ Porthos, and Ms. D'Artgnan are talking during a break at the conference. Hearing a lot of chatter about the upcoming election they begin to talk and offer their own opinions about who they think should be the next Governor of their state. Is this a problem?

What if they are just discussing election security issues, is this a problem?





Political Activity



Considerations

- ✓ 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](#).

Military – DoDD 1344.10 - 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.



Answer to Question 7

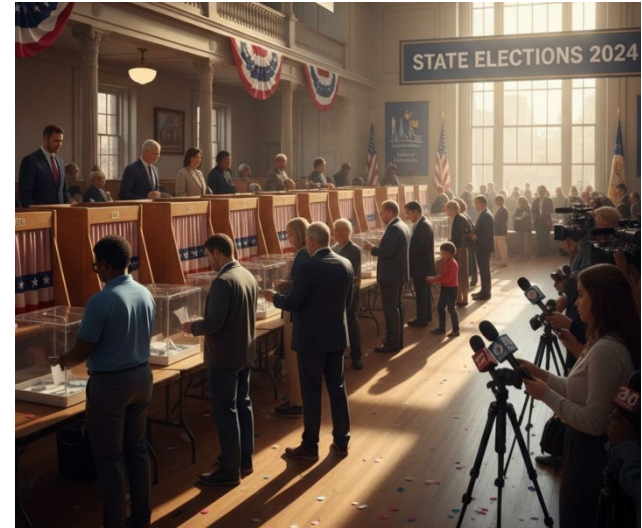


Yes

They are all considered to be on duty, and as such, the Military under DoDD 1344.10 and Civilians under the Hatch Act, are prohibited from engaging in political activity in the workplace, and *they are engaging in discussions designed to support or oppose an active candidate in current election*. Also, as the supervisor, LTC Athos cannot use her rank or position to command, coerce, or *attempt to influence* a subordinate's vote or political alignment. So she must be even more careful that she does not give the appearance of attempting to influence her subordinate regarding the election.

NO

Discussing issues are not prohibited by the Hatch Act, unless it is for the primary purpose of supporting or opposing a current candidate or party for a current election. Issues such as gun control, immigration, and reproductive rights, while typically associated with one party or the other are not per se barred by the Hatch Act.





Question 8



Ms. D'Artgnan worked for Med Widget company until she joined DHA last year. Med Widget has a booth at the conference, and Ms. D'Artgnan goes to speak to them. Med Widget is involved in the clinical investigation that Ms. D'Artgnan is working on at the lab. Is it a problem for her to work on this clinical investigation that includes Med Widget?



Former Employer



Impartiality Regulation (5 CFR § 2635.502)	§1117 of the FY 2022 NDAA
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.	For <u>two years</u> after serving as an employee, officer, director, trustee, or general partner with a non-Federal entity, DoW 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.
This restriction applies to all employees in the Executive Branch.	This restriction only applies to employees of the DoW.

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).



Answer to Question 8



YES

All employees, Military and Civilian, are barred for two years from working on any particular matter involving their former employer. Ms. D'Artgnan must recuse herself from participating in the current clinical investigation or seek a written waiver from her supervisor.



Question 9



MAJ Porthos, who works for LTC Athos, has decided to engage in some off-duty employment (ODE) at the local university hospital. He has received written approval from his supervisor LTC Arthos. Forgetting about his ODE, LTC Athos assigns him an additional duty as the MTF agreements manager. The MTF has several agreements with the university hospital. Is this a problem?





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](#).



Answer to Question 9



Yes

This is prohibited. Supervisor LTC Athos should have known better, but this is still a conflict of interest that MAJ Porthos is personally responsible for avoiding. As an employee, even a part-time employee of the local university hospital, MAJ Porthos may not take any official action at the MTF (participate personally and substantially) in a particular matter (an agreement between the MTF and the university hospital), if that action would have a direct and predictable impact on the local university hospital. The impact can be positive or negative and can be very slight impact. This is potentially a criminal conflict of interest in violation of 18 U.S.C. § 208(a).





Answer to Question 9, Continued . . .



How to correct the problem?

- MAJ Porthos can recuse himself with the written approval of LTC Athos from working on any agreement that involves the local university hospital; or
- MAJ Porthos can quit his part time position at the local university hospital.
- Waiver unlikely because rarely granted.





Ethics Resources Site



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.

The 14 [Principles of Ethical Conduct](#) are an overview. You can also find specific ethics information on this site or contact your assigned Ethics Official by using the selector below. You can always reach out to our central inbox DHA-OGCEthicsOffice@health.mil and you will receive a response.

This [Ethics Overview](#) provides general information about ethics topics. For more detailed information and tools, please check the sections below.



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.



Visit the **Ethics Resources*** site on the DHA InfoHub to find:

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

Send ethics questions to the duty attorney at DHA-OGCEthicsOffice@health.mil.

* <https://militaryhealth.sharepoint-mil.us/sites/infocenter/SitePages/DHA-Ethics-Resources.aspx>



How to Obtain CE/CME Credit

***Only MHS personnel are eligible to claim CE/CME credit from CEPO**

2026 Annual Ethics Training Town Hall - August 18, 2026

To claim CE/CME credit for this activity, complete the evaluation survey and pass the posttest with 80% accuracy, before the evaluation period ends on **September 1, 2026, at 11:59 PM Eastern Time.**

1. Go to the continuing education registration page at <https://www.dhaj7-cepo.com/content/2026-annual-ethics-training-town-hall-august-18-2026>
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. Note: You will be required to enter the following access code.

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?

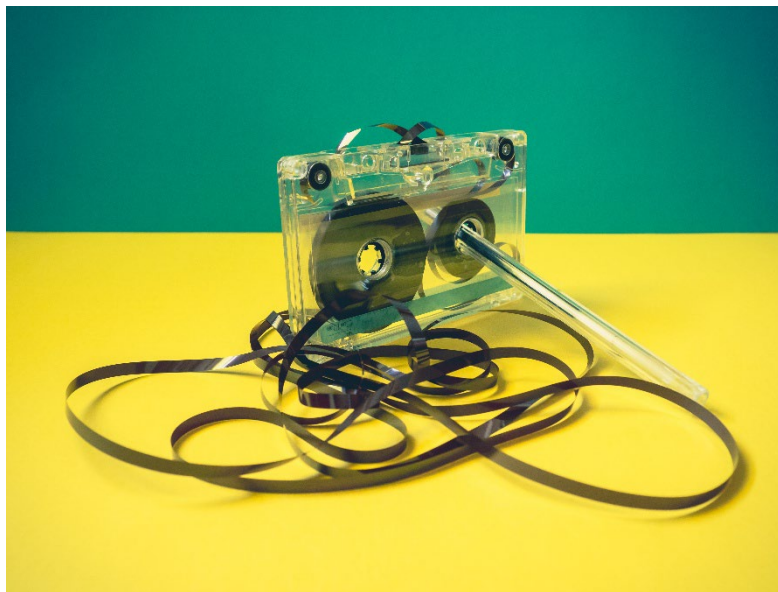
Email the DHA J-7 Continuing Education Program Office at dha.ncr.j7.mbx.continuing-education-office@health.mil.



BACKUP SLIDES—



- BACKUPSLIDES for the 2026 Ethics Town Hall on August 18th—follow this slide





Presenter



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.



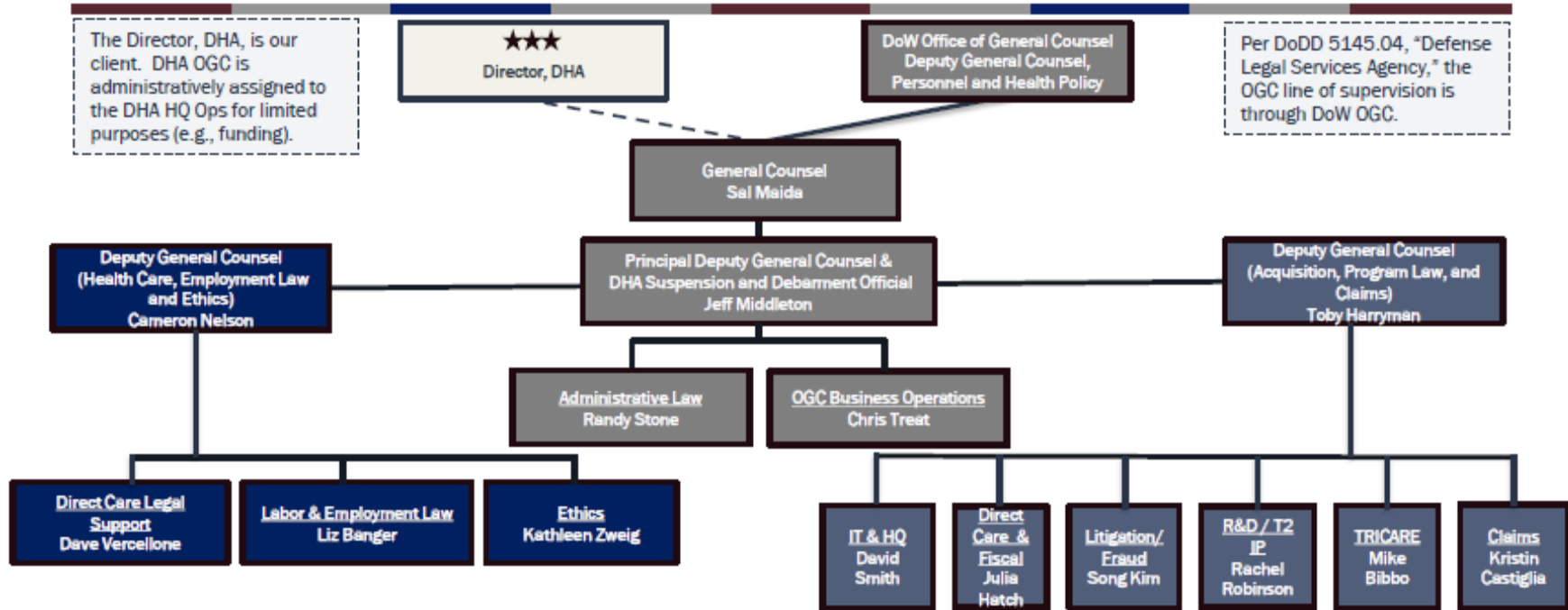
Topics in Ethics



- 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



OGC Organizational Chart





Office of General Counsel - Contact Information

Ethics	DHA-OGCEthicsOffice@health.mil
Litigation	dha.ncr.dha-ogc.mbx.ogc-litigation@health.mil
TRICARE	dha.jbsa.j-10.mbx.tricare-customer-support@health.mil
Direct Care Legal Support	dha.ncr.dha-ogc.mbx.direct-care-legal-support-hq@health.mil
Claims	dha.ncr.dha-ogc.mbx.claims@health.mil
Contracts	TBD
Administrative Law	dha.ncr.dha-ogc.mbx.congressionals@health.mil
Labor & Employment	dha.ncr.dha-ogc.mbx.ogcletasker@health.mil
Research & Development	TBD



Ethics Branch



Kathleen Zweig, Branch Chief

Sarah Gentry, Ethics Official

Claes Lewenhaupt, Ethics Official

Laurie Rafferty, Ethics Official

Crystal Wong, Ethics Official

John Kilby, Information Management Specialist

Contact: DHA-OGCEthicsOffice@health.mil



Ethics Responsibilities



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

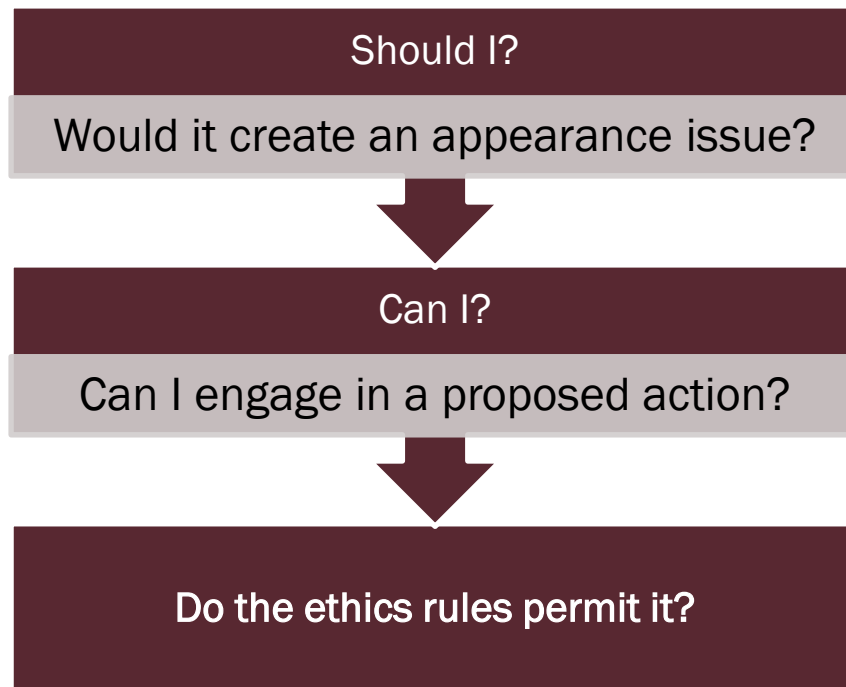
Take advantage of the ethics resources/seek guidance from ethics officials. Ask before you act.

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 DoW depends on a strong foundation of integrity – EVERYONE has a part.



Ethical Decision Making



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



Misuse of Position



Public Office for Private Gain	Endorsement	Letters of Recommendation
Personnel may not use their DoW 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 DoW. 5 CFR § 2635.101(b)(7).	Personnel may not use or allow the use of their DoW position or title or any authority associated with their DoW position or title to endorse a non-federal entity, its services or products. 5 CFR § 2635.702(c).	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: • 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> • whom they are recommending for Federal employment. 5 CFR § 2635.702(b).



Misuse of Position



Use of Time	Use of Property	Non-Public Information
Personnel shall use official time in an honest effort to perform official duties. 5 CFR § 2635.101(b)(9).	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).	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.

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).



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!

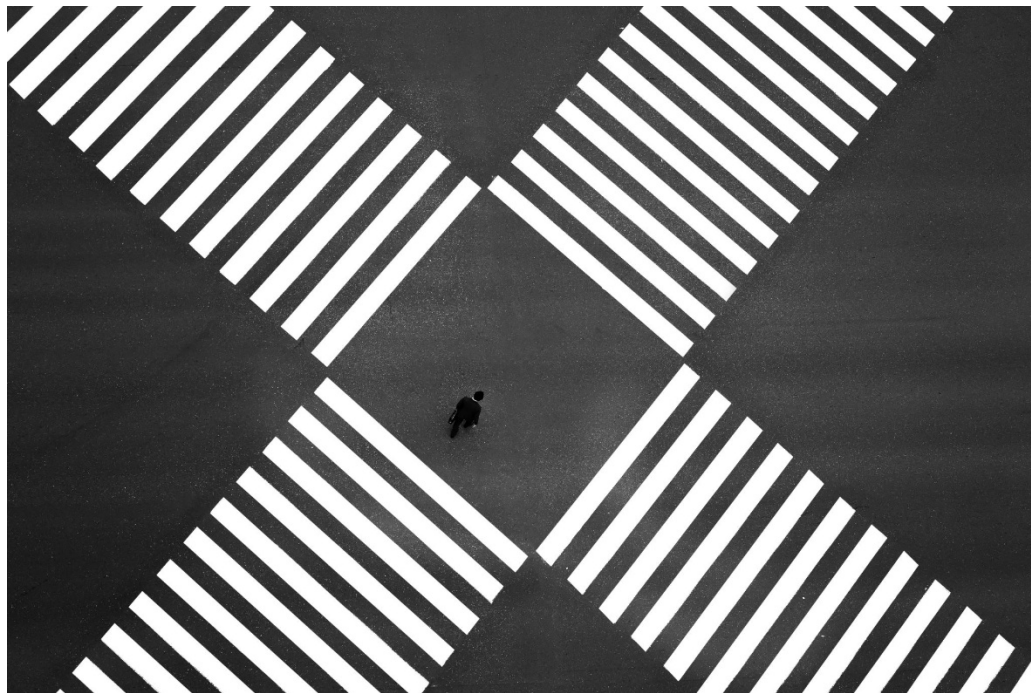


Misuse of Position





#1 Tip to Avoid Conflicts



Beware of intersections!!!



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 7 days for staff to input rosters.*

- To find our information papers, visit: [DHA Ethics Resources](#)
- Inquiries can also be sent to: DHA-OGCEthicsOffice@health.mil



Important References

- [DHA Ethics Resources](#) Site
- [5 CFR § 2635.101b](#), 14 Principles of Ethical Conduct
- [18 U.S.C. §§ 201-209](#), Criminal Statutes
- [5 CFR Part 2635](#), Standards of Ethical Conduct for Employees of the Executive Branch
- [5 CFR Part 3601](#), Supplemental Standards of Conduct for Employees of the DoD
- [Summary of the Supplemental Ethics Rules](#)
- [DoD Joint Ethics Regulation \(JER\) \(May 15, 2024\)](#)
- [DoW's Standards of Conduct Office – Ethics Laws & Regulations](#)

