

## Ethics Program Specialist (Grade 13) - 301

### **Implements an ethics program for (IC) that ensures compliance with the full range of ethics, financial disclosure, conflicts of interest, standards of conduct, political activity, and procurement integrity requirements.**

- Provides advice and makes recommendations to the (IC) Deputy Ethics Counselor (DEC) based on comprehensive and up-to-date knowledge of all laws, regulations, judicial precedent, policies, procedures and documents applicable to the filing, review and approval (including waivers, recusals, and authorizations) of Request for Official Duty Memos, Requests for Outside Activity (NIH-520), Annual Report of Outside Activities (HHS-521), Certification Checklist for Sponsored Travel of Non-FTE Person (Appendix 10B), Widely Attended Gatherings (NIH-2803), Public Financial Disclosure Reports (SF-278), Cash or in-kind (348) travel reimbursements, Confidential Financial Disclosure Reports (OGE-450), and Initial Report of Financial Interests in Substantially Affected Organizations (HHS-716).
- For the assigned [portfolio of (IC) employees OR IC organizational components(s) OR specific types of ethics actions], conducts timely reviews of filed reports; thoroughly researches and analyzes the information provided by filers; conducts extensive investigations and/or makes further inquiries to obtain more factual details that often are not obvious or readily available; and consults with the NIH Ethics Office (NEO) on particularly complex, precedent-setting or potentially controversial cases in order to make recommendations to the Deputy Ethics Counselor (DEC) on financial disclosure reports, employee requests for approval of outside activities, and other ethics clearance matters. Assigned financial disclosure documents receive initial review within 60 days of receipt or are documented to indicate difficulties.
- Conducts the initial review, thoroughly analyzes, and prepares all background information and documentation for all ethics actions involving (IC) senior employees (aka "Top Five"), including the Director, Deputy Director, Scientific Director, and Clinical Director.
- Provides advice to key officials and other specialists on highly complex and/or potentially controversial cases, conducts or advises on necessary research, conducts thorough and in-depth analyses of complex business relationships, and drafts or assists other Specialists in preparing recommendations for action by the DEC, including recommendations to address ethics concerns through waivers, recusals or divestitures.
- Reviews, analyzes, and processes ethics actions under the jurisdiction of the NIH Ethics Advisory Committee (NEAC) for assigned employees, and provides advice and assistance to other specialists. In most cases, forwards such requests that are submitted complete and timely to the (IC) Office of Ethics to the NIH Ethics Office (NEO) at least six (6) weeks in advance of the activity or associated travel, giving appropriate priority to highly visible or especially sensitive actions.
- Reviews, analyzes, and processes other ethics actions requiring review by the NIH Ethics Office (NEO), and provides advice and assistance to other ethics specialists. In most cases, forwards such requests that are submitted complete and timely to the (IC) Office of Ethics to the NIH Ethics Office (NEO) at least four (4) weeks in advance of the activity or associated travel, giving appropriate priority to highly visible or especially sensitive actions.
- If less advance time than that stated above exists prior to the start date of an activity requiring NEO review, collects and reviews all required documentation and submits to the NEO within five (5) business days of the employee's receipt of the invitation, if the invitation is submitted promptly upon receipt to the (IC) Office of Ethics.
- Reviews CRADA conflict-of-interest surveys, and provides timely recommendations so that the DEC can clear prior to review by the NIH CRADA review committee.
- Written clearance is provided for guest researcher/volunteer appointments in sufficient time to meet appointment deadlines or program staff is advised of impediments.
- Researches, assembles and clears background materials and replies for inquiries involving the Ethics in Government Act submitted under the auspices of the Privacy Act or Freedom of Information Act, coordinating with appropriate IC and NIH staff.
- Tracks and ensures compliance with annual ethics training requirement(s).
- Identifies and raises legal, policy, and ethics program management issues to the DEC that warrant referral to Departmental and NIH ethics officials to ensure appropriate level of attention and consistent approach in resolution.

### **Ensures program accountability by timely filing all reports and maintaining all appropriate records.**

- Enters and updates (IC) information in the electronic NIH Ethics Management and Information Systems (EMIS), and maintains hard copies of ethics documents for assigned employees in accordance with the applicable systems of records to ensure the maintenance of accurate and up-to-date data on the NIH Ethics Program.
- Provides information to the DEC for all recurring DHHS and NIH workload reports in a complete and timely manner.
- Conducts in-depth background research, analyzes findings, presents conclusions, and drafts responses to Congressional, DHHS and NIH ethics inquiries in a complete and timely manner.

**Ensures that the (IC) Ethics Program provides for employee awareness and compliance through training, administrative reminders and alerts, and ongoing consultations and advice to employees, supervisors and administrative staff.**

- Renders prompt and informed advice and counsel to managers and employees on all aspects of the NIH Ethics Program including conflict of interest, standards of conduct, representational activities, salary supplementation, post-employment restrictions, and political activities.
- Program areas/employees are advised promptly of any impediments or delays related to requested activities.
- Provides timely notification to newly covered employees of their requirement to file financial disclosure report(s), due dates, and potential sanctions for failure to comply.
- Provides assigned employees who are SF-278 filers with advice and information on the annual requirement to file, and provides advice and instructions for completing the necessary forms or using the optional NIH Ethics Enterprise System (NEES) for the preparation of SF-278s.
- Responds to inquiries from incumbent OGE Form 450 filers related to the 2006 shift to an annual rather than fiscal year reporting period, waiver of the October 2006 filing, and the revised filing date (February 15, 2007) in accordance with OGE notices and NIH instructions. Provides advice and assistance on the final amended OGE Form 450 and related information, including the revised criteria for designating confidential filers and information required to be reported, and instructions for completing the report.
- Provides regular updates and guidance on new policies and procedures and changing requirements to (IC) top management and assigned (organization/employees) through meetings, emails, and other appropriate means.
- Assists the DEC in developing (IC) communication strategies, standard operating procedures and training materials.
- Assists the DEC in ensuring that all covered and new (IC) employees receive ethics training in compliance with OGE regulations and HHS and NIH instructions by tracking and reporting on completed training for assigned employees.