



# United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

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Memorandum

To: All Department of the Interior Employees

From: Todd D. Willens  
Chief of Staff

Subject: Ethics Reminder During COVID-19 Pandemic

In this unprecedented COVID-19 pandemic, we have more professional and personal demands on our time than ever before. To further complicate matters, many of us find ourselves working in a changed environment, whether working from home with new “coworkers” (i.e., family members similarly displaced from their employer or school), working from deserted offices, or working under other arrangements. During these circumstances, I want to provide a helpful reminder of the ethics rules. The guidance below will help employees avoid inadvertent ethics-related problems as we all work to advance the mission of the Department of the Interior (Department).

Please keep in mind that, although we may be working from a more relaxed space at home, the rules and policies that govern official (and some personal) activities as Department personnel continue. Here are a few rules to keep in mind:

1. Official Time and Department Resources: Remember the basic principle of official time for official purposes. This means that while on the clock employees may not engage in outside activities such as other employment or volunteering for a non-profit. It means employees may not engage in personal activities such as managing a stock portfolio or other business activities. Another basic principle while teleworking is that employees may only use Government resources for proper purposes. This means that Government computers should only be used by all employees for official Government business.
2. Partisan Political Activities: As discussed in my recent [memorandum](#), the Hatch Act continues to apply while we telework. Department employees may not engage in political activity while teleworking. This means all employees may not engage in any “activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group.”

Be careful of pitfalls. Department employees should be particularly mindful of their use of personal devices while working from home. Remember the Hatch Act rules apply when using a personal computer or smartphone while on duty. If teleworking employees use a home computer to forward an email with campaign material to others, it would constitute a violation of the Hatch Act. Likewise, if Department employees post partisan

comments to a blog or solicit political contributions on a social media site, it would constitute a violation of the Hatch Act.

3. Gifts: Many Department employees may experience a range of hardships due to the COVID-19 pandemic. Public support for our activities can lead to offers of gifts. For example:

- a. Gifts from Outside Sources: Department employees on the front lines, like law enforcement, may be offered unsolicited gifts from the general public. Please remember to contact ethics officials to determine if gifts can be accepted or to obtain guidance on how to dispose of them otherwise.

Some Department employees or their friends or family members may seek financial assistance from crowdsourced fundraising platforms such as GoFundMe. Crowdsourced or web-based fundraising poses several ethical traps, such as the potential for misuse of position, improper solicitation, and prohibited gifts. Given the potential ethical issues raised by crowdsourced or web-based fundraising, Department employees are strongly encouraged to consult with ethics officials before any such campaign begins or immediately upon learning that a friend or family member might be crowdsourcing to support any employee.

- b. Gifts Between Employees: Department employees show their generosity to each other during hard times. To avoid concerns about the appearance of coercion, there are rules that provide that (1) supervisors cannot accept gifts from subordinates and (2) employees cannot accept gifts from other lower-paid employees. There are very narrow exceptions to these rules.
  - c. Gifts to Department: Department employees may receive offers of gifts to the Department, whether tangible items or services (*i.e.*, cleaning services for Government vehicles or free deliveries), to support our mission. If we receive such offers, remember only certain employees can accept gifts on behalf of the Department. If a Department employee is offered a gift to the Department, please contact the Bureau/Office partnership contacts to determine the best way forward.
4. Outside Employment: Department employees enduring hardship due to the COVID-19 pandemic may also be interested in seeking outside employment. Department regulations require that employees seek prior approval for certain outside employment. Please contact your ethics official for more information about this requirement.
  5. Conflicts of Interest and Impartiality: With the response to the COVID-19 pandemic requiring concerted and rapid action, we must all remain vigilant that we are not participating in efforts where we have a financial interest or where our impartiality might be questioned. The criminal conflict of interest statute dictates that employees not participate personally and substantially in Department matters where the employee, their spouse, or dependent child have a financial interest. Interests also imputed include those of (1) all organizations where an employee may serve as an officer, director, trustee,



general partner or employee and (2) any person or organization with which an employee is negotiating or has an arrangement concerning prospective employment. If you become aware of a potential conflict, please refrain from further participation and contact the ethics official.

The impartiality rule also provides that we should recuse ourselves from working on Department assignments (1) that have a financial impact on persons or entities we have covered relationships with, such as members of our household, close family and friends, or (2) where a reasonable person with knowledge of the situation might question our impartiality.

The Department is excited to announce the launch of the DOI Ethics App. The DOI Ethics App provides immediate access to Federal ethics laws and rules, forms, and contact information for ethics officials around the clock from any device. Department employees can use the DOI Ethics App to find guidance on questions about conflicts of interest, gift acceptance, misuse of position and concerns about impartiality. Department employees can also view the latest ethics updates and deadlines for various ethics requirements on the DOI Ethics App.

The DOI Ethics App will be added to official Apple government furnished equipment provided by the Department. If employees have Android government furnished equipment, they must download the app in the Department's app catalog. If employees do not have government furnished equipment, the app is available to be downloaded for free in the App Store or Google Play on personal electronic devices. Just search for DOI Ethics and click download.

If employees have questions about the app and how to download it, they should contact the Departmental Ethics Office at [DOI\\_Ethics@sol.doi.gov](mailto:DOI_Ethics@sol.doi.gov).

Department employees should reach out to ethics officials with questions about the guidance above or other ethics rules.

Contact information for the Departmental Ethics Office: <https://www.doi.gov/ethics/contact-information>.

Contact information for ethics teams servicing the Bureaus and Offices: <https://www.doi.gov/ethics/bem>.

For additional information on the Department and its ethics rules and related policies, please visit [www.doi.gov/ethics](http://www.doi.gov/ethics).

Thank you to all employees for their dedication and service. Stay safe.