

Overview of Federal Ethics Laws and Regulations For Friends Groups and other non-Federal Organizations

Executive Branch employees, including U.S. Fish and Wildlife Service (Service) employees, must follow Federal [ethics](#) laws, regulations and policies when partnering with Friends groups and other non-Federal organizations. These ethics rules are intended to preserve the public’s trust in the Service’s integrity, impartiality, and stewardship of government resources. Service employees are expected to avoid even the appearance of impropriety. Although an activity with a Friends group or other non-Federal organization may appear to be permissible, often Service employees must seek ethics advice and/or management approval before participating in that activity. Below is a summary of key ethics rules that apply to Service employees who work with our non-Federal partners.

Personal Gifts to Service Employees	
General rule	In general, Federal employees are prohibited from soliciting or accepting gifts offered by a “prohibited source” or if offered because of an employee’s official position. However, the Federal regulations include some limited exceptions to this rule (listed below). Even if allowed to accept a gift, Federal employees are advised to consider declining if they believe that a reasonable person would question their impartiality or integrity by accepting the gift. Friends groups and non-Federal Service partners are considered “prohibited sources” under the ethics regulation definition, so employees may accept only the gifts specifically allowed by the regulation.
Why are Friends Groups referred to as “prohibited sources?”	“Prohibited source” is a legal term used in Federal ethics regulations. For Service employees this term is defined as including all persons or entities who seek official action from the Service, do business or seek to do business with the Service, conduct activities regulated by the Service, or have interests that may be substantially affected by the performance or nonperformance of the employee’s duties. <u>Examples</u> of “prohibited sources” include non-profit environmental organizations, contractors, concessionaires, partners, and entities that receive permits, grants, or other assistance from the Service. Friends groups also are “prohibited sources” because they seek official action from, do business with and conduct activities regulated by the Service.
What is considered a gift?	Anything having monetary value (e.g., meals, loans, discounts, transportation, and lodging.)
What items can Service employees accept from a “prohibited source” or if offered because of their position?	
Food and refreshments	Modest items of food and non-alcoholic refreshments not offered as part of a meal (e.g., soft drinks, coffee, and donuts). Also, meals valued at under \$20 (not to exceed \$50 in a calendar year from the same source.)
Items of little monetary value	Greeting cards and items with little intrinsic value such as plaques, certificates, and trophies which are intended primarily for presentation.
Gifts valued at \$20 or less	Items with a market value of \$20 or less (not to exceed \$50 in a calendar year from the same source). If valued over \$20, the employee may not pay the difference but must pay the gift’s full market value to accept it. <u>Examples</u> : \$15 sack lunch on field trip, \$10 coffee mug.
Free attendance at a meeting or event that includes a waived registration fee and/or, free meals, etc.	Event sponsor’s offer of free attendance to a “widely attended gathering” if the employee obtains prior written supervisor approval. A “widely attended gathering” is defined as an event attended by (1) a large number of persons (2) with a diversity of views or interests, (3) where there is an opportunity to exchange ideas. To receive approval, the employee’s attendance must further the Service’s programs or operations. If free attendance is offered by someone other than the event sponsor, the regulation requires that more than 100 attendees be expected and that the market value of the gift of free attendance is \$415 or less. <u>Examples</u> : banquets, luncheons and conferences.
Awards and Honorary degrees	Awards and honorary degrees valued at over \$20 and travel expenses to award events allowed in some circumstances. Ethics review required. Supervisor approval required for awards over \$200. <u>Examples</u> : meritorious public service award, and annual National Wildlife Refuge Association Refuge Manager of the Year award.

Gifts and Donations to the Service

<p>What items can employees accept on behalf of the Service?</p>	<p>Employees can accept donations to the Service that are approved and processed in accordance with Service policies. <u>Examples</u>: Native American blanket, equipment, real estate, products, services, and money.</p>
<p>What items can the Service accept on behalf of employees?</p>	<p>The Service can accept travel expenses for employees to attend meetings or similar events if approved and processed in accordance with Service policies. <u>Example</u>: airfare, hotel, and food expense for trip to speak at a conference hosted by a non-Federal source.</p>

Service Employee Participation in Fundraising Activities for non-Federal organizations

<p>General rule</p>	<p><u>Workplace</u>: Federal employees are prohibited from fundraising for non-Federal organizations in the Federal workplace, except for the Combined Federal Campaign (CFC). Additional charitable fundraising activities may be authorized by the Director of the Office of Personnel Management for victims in cases of emergencies and disasters. <u>Outside of the workplace</u>: Employees may donate to any charity of their choosing.</p>
<p>Can employees respond to public inquiries regarding donations of money to the Service?</p>	<p>Employees may provide factual information about donation options and explain how these contributions benefit Service programs. Employees must not:</p> <ul style="list-style-type: none"> • Endorse a specific organization, • Solicit (money or support) unless authorized to do so, or • Receive donations on behalf of Friends or other non-Federal organizations.
<p>Can employees <u>attend</u> fundraising activities for non-Federal organizations as part of their official duties (on or off Service-managed property)?</p>	<p>Employees may attend, in their official capacity, an event that is in direct support of a Service site or program. Employees must not:</p> <ul style="list-style-type: none"> • Actively and visibly participate in the event’s promotion, preparation or presentation, such as presenting an award at the event, or • Attend events featuring lobbying or games of chance.
<p>Can employees <u>speak</u> at a fundraising event for a non-Federal organization as part of their official duties (on or off Service-managed property)?</p>	<p>Employees may:</p> <ul style="list-style-type: none"> • Speak on a subject matter related to their official duties at an appropriate forum, • Provide factual statements that focus on the partnership, projects, and expected outcomes, • Express appreciation for a partner’s support and received donations. <p>Employees must not request or solicit donations and/or support for the non-Federal organization.</p>
<p>Can employees participate in a fundraising activity for a non-Federal organization as a private citizen during their personal time?</p>	<p>Yes, if they do not:</p> <ul style="list-style-type: none"> • Solicit donations from subordinates or partner organizations, • Use their official title, position or authority in a manner that implies the Service sanctions or endorses the fundraising effort, • Use Government resources or time, • Participate in an activity directed at the success or failure of a political party, candidate for partisan political office, or partisan political group, • Participate in uniform or while driving a Service vehicle.
<p>Can employees provide Government equipment and personnel to support a fundraising activity for a non-Federal organization?</p>	<p>Only if authorized by a written agreement or Departmental/Service policy. Employees must not offer activities, facilities, special tours, or government property for non-Governmental fundraising purposes. <u>Example</u>: Employees cannot offer special behind-the-scenes tours conducted by a Federal employee as an item to be auctioned at a non-Federal organization fundraising event.</p>