



**UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE GENERAL COUNSEL**

MEMORANDUM

TO: Counsel to the Inspector General
Assistant Counsels to the Inspector General
Office of Inspector General

FROM: The Designated Agency Ethics Official

SUBJECT: Delegation of Authority for Ethics Program

I. DELEGATION

Under the authority vested in me by the Secretary through delegation EA/EGB3/116 certified on December 18, 2008, EG/EGB/61 certified on May 10, 1993, and EG/EGB/64 certified on May 10, 1993, I designate you as Deputy Ethics Officials and delegate to you the authority to perform the functions of the Designated Agency Ethics Official, in accordance with 5 C.F.R. §§ 2638.203 and 2638.204(a), for current and former employees of the Office of Inspector General, as follows:

- A. Confidential Financial Disclosure Reports. In accordance with 5 C.F.R. § 2634 Subpart I, determine which employees must file a Confidential Financial Disclosure Report; collect and review the reports; make determinations regarding compliance with applicable laws and regulations; take any necessary remedial action, subject to the limitation discussed below in paragraph D.; and certify these reports.
- B. Ethics Advice and Counseling. Make determinations and provide oral and written advice on ethics questions for employees under appropriate regulations, including, but not limited to, the Standards of Ethical Conduct for Employees of the Executive Branch. 5 C.F.R. § 2635.
- C. "Agency Designee." Render determinations under the Standards of Ethical Conduct with respect to awards, honorary degrees, prohibited gifts, conflicts of interest, impartiality, and other matters requiring a disposition by an "agency ethics official" and/or an "agency designee."
- D. Conflicts of Interest. Assess information provided by employees or others to ascertain the application of the conflict of interest statutes and regulations and resolve actual or potential conflicts of interest or the appearance of a loss of impartiality, except that you may not issue waivers pursuant to 18 U.S.C. § 208(b) or 5 C.F.R. § 2635.503(c).

- E. Approval of Outside Activities. Provide written determinations with regard to requests for approval of outside activity submitted under the Department's Supplemental Standards of Ethical Conduct at 5 C.F.R. Part 6301.
- F. Ethics Training. Conduct annual ethics training required under 5 C.F.R. §§ 2638.704 and 2638.705.

II. RESERVATIONS

This delegation is limited to the ethics program elements and functions listed above. Authority to issue waivers pursuant to 18 U.S.C. § 208(b) and 5 C.F.R. § 2635.503(c) is reserved. All activities undertaken pursuant to this delegation are subject to my supervision.

III. REDELEGATION

This authority may not be redelegated.

IV. CERTIFICATION AND EFFECTIVE DATE

This delegation is effective upon certification by the Department's Principal Delegations Control Officer.

/s/
Susan Winchell

OGC Clearance and Date: /s/ Debbie Friendly. 11/29/2010

Certified Date: 12/6/2010

Departmental Delegations Control Officer: /s/ Naty G. Beetle

Control Number: EGR6/EF/190