



**Armed Forces Retirement Home
Chief Operating Officer
3700 N. Capitol Street NW, P.O. Box 1303
Washington, DC 20011-8400**

January 19, 2010

MEMORANDUM FOR ALL MANAGERS, SUPERVISORS AND EMPLOYEES

Subject: Policy Statement Regarding the Acceptance of Gifts

As we begin calendar year 2010, I would like to take this opportunity to reemphasize the Armed Forces Retirement Home's (AFRH) policy regarding the acceptance of gifts. Under Federal Ethics regulations, our Residents fall into the category of "prohibited sources". That means that there is a special reason for caution regarding gifts.

The Residents of the AFRH have served our country, often during two or three wars: serving them is the only reason for the existence of this agency. We are paid by the Federal Government to perform our duties, and "dual compensation" (getting paid once by the Federal Government, and again by a private interest for doing the same job) is illegal. Nor should we give even the appearance that one Resident might be favored over another based upon gifts, or that we are using our public offices for private gain. For these (and other reasons), this agency has been very strict about the receipt of gifts from Residents—removal has been the usual penalty for violation of our gifts policy (even for a first offense).

It is important that you understand the rules very well:

- First, the fact that you may accept gifts in limited circumstances and subject to the strict requirements discussed below, does not imply that you must or should accept gifts: you may still politely decline to accept any gifts at all—in fact, you are encouraged to do so.
- You may not accept cash in any amount or any form! (No cash, checks, investment interests such as stock, bonds, or certificates of deposit.)
- You may not *solicit* gifts under *any* circumstances. (That would include, teasingly asking a Resident what he/she intends to give you for Christmas or your birthday.)
- Any gifts which are accepted must be reported to your supervisor or Service Chief. If you accept a gift and do not report it immediately (the same day), you are in violation of the policy, and will face disciplinary action. The supervisor or Service Chief will make a record of the gift, documenting that it does not violate Ethics regulations. This includes verifying that it does not appear to have a value of over \$20, and that you have not received gifts valuing more than \$50 from any one Resident during the course of the calendar year. Further, the overall volume of gifts received by an employee must not rise

to the level of appearing to use your “public office for private gain”. This record will show the name of the Resident, a description of the gift and the approximate value, and your name.

- There are a few things that do not rise to the level of a “gift” under the regulations: modest food items (such as a piece of candy) or greeting cards. These do not need to be reported at all.

More information on Ethics is available from www.oge.gov.

Remember: when in doubt ask for an Ethics opinion!

- Ms. Sheila Abarr is the Designated Agency Ethics Officer. She can be reached at (202) 730-3043 or by e-mail at Sheila.Abarr@afrh.gov.
- David Lentz is the Deputy Agency Ethics Officer for matters regarding the Washington campus. He may be reached at (202) 730-3504 or by e-mail at David.Lentz@afrh.gov.

The best way to obtain an opinion is to send an e-mail or submit a letter: that way, you will have the Ethics determination in writing—which will protect you (if you have accurately described the situation). (If you make your own determination, and are wrong, you are subject to discipline.)

Maintaining high ethical standards is absolutely essential—especially in a retirement home dealing with elderly and sometimes vulnerable Residents. It is vital that we all display the level of integrity that our Residents deserve...and which is required by law and regulations.


TIMOTHY C. COX
Chief Operating Officer