



ARMED FORCES RETIREMENT HOME  
3700 NORTH CAPITOL STREET NW  
WASHINGTON, D.C. 20011

OFFICE OF THE CHIEF OPERATING OFFICER

January 19, 2024

**MEMORANDUM FOR: MANAGERS, SUPERVISORS, RESIDENTS, AND EMPLOYEES OF THE ARMED FORCES RETIREMENT HOME (AFRH)**

**SUBJECT: 2024 Ethics Policy Statement Regarding Acceptance of Gifts from Residents**

It is AFRH policy to prohibit individual gift(s) between Residents and employees, including contract employees.

Under Federal Ethics regulations, the Residents of the AFRH fall into the category of “prohibited sources”. This means there is a special reason for caution in the area of employees, to include contract employees, receiving gifts from AFRH Residents.

The Residents of AFRH have served our country often during two or three wars; serving them is the only reason for the existence of this Agency. AFRH employees are paid by the Federal Government to perform duties; “dual compensation” (getting paid once by the Federal Government, and again by a private interest for doing the same job) is illegal. Furthermore, AFRH employees should not give the appearance that one Resident might be favored over another based on gifts received, or that the employee is using their public office for private gain. It is for these reasons, AFRH has been very strict about the receipt of gifts from Residents; removal for a first offense has been the usual penalty.

Although AFRH prohibits the acceptance of gifts from Residents, the following guidance is provided if a Resident is adamant about providing a small gift to an employee:

- First, employees are strongly encouraged to politely decline acceptance of any gift from a Resident, no matter how small it may be.
- Employees may not solicit gifts under any circumstances. That includes teasingly asking a Resident what he/she intends to give you for Christmas or your birthday.

- Employees may not accept cash (or investment interests such as stock, bonds, or Certificates of Deposit, gift cards, etc.). Ethics regulations flatly prohibit such gifts.
- Gifts offered by Residents must be reported to the employee’s supervisor or Service Chief immediately. 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 makes a record of the gift to verify that it is not valued at over \$20 and that you have not received gifts valued at more than \$50 from any one Resident during the course of the calendar year. The overall volume of gifts must not rise to the level of appearing to use your “public office for private gain.” The records must note the name of the Resident, a description of the gift, its approximate value, and the employee’s name. The supervisor or Service Chief determines if the employee can accept the gift or must return it to the Resident.
- There are a few things that do not need to be reported because they don’t rise to the level of a “gift” under the regulations, such as modest food items, a piece of candy, or a greeting card.

More information on Ethics is available at [www.oge.gov](http://www.oge.gov).

Remember: When in doubt, ask for an Ethics opinion. The AFRH Ethics Official may be reached by email at [Joseph.Pollard@afrh.gov](mailto:Joseph.Pollard@afrh.gov) or by phone at (202) 541-7557. The best way to obtain an opinion is to send the Ethics Official an email, so that you have the Ethics determination in writing, which protects you (if you have accurately described the situation). If you make your own determination and are wrong, you may be subject to disciplinary action.

Maintaining high ethical standards is absolutely essential, especially in a Retirement Home dealing with elderly and often vulnerable Residents. It is vital that we all display the highest level of integrity when interacting with our Residents.



JOHN S. RISCASSI  
Chief Operating Officer

Distribution:  
All Employees (electronically)  
AFRH Residents