



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

September 21, 2011

**MEMORANDUM FOR ALL MANAGERS, SUPERVISORS AND EMPLOYEES OF
THE ARMED FORCES RETIREMENT HOME**

Subj: ETHICS POLICY REGARDING ACCEPTANCE OF GIFTS FROM RESIDENTS

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

It is AFRH’s policy to prohibit individual gift(s) between Residents and employees which includes contract employees.

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. AFRH employees are paid by Federal Government to perform duties and “dual compensation” (getting paid once by the Federal Government, and again by a private interest for doing the same job) is illegal. Further, AFRH employees should not give the appearance that one Resident might be favored over another based upon gifts, or that the employee is using their public office 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, even for a first offense. In fact, due to the nature of our mission, our Agency has had stricter rules than the government-wide rules concerning receiving of gifts. The government-wide rules allow for gifts from prohibited sources of up to a value to \$20.00 per occasion, for a maximum of \$50.00 of value per calendar year for all gifts from that source.

Although the AFRH **prohibits** the acceptance of gifts from Residents, we realize that on occasion a Resident may persist in giving a small gift to an employee. The following guidance is provided when 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 would include, 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) – 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 will make a record of the gift verifying that it does not appear to be over \$20 in value, and that you have not received more than \$50 in value 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 will show the name of the Resident, a description of the gift and the approximate value, and the employee's name. The supervisor or Service Chief will advise the employee on whether the gift may be retained or if it has to be returned to the Resident.
- 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 card(s). These do not need to be report.

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

Remember: When in doubt, ask for an Ethics opinion. The AFRH Ethics Official may be reached at (202) 541-7550 or by email at Sheila.Abarr@afrh.gov. The best way to obtain an opinion is to send the Ethics Official an email – 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 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 deserve and which is required by law and regulation.



STEVEN G. MCMANUS
Chief Operating Officer

Copy to:
RAC Chairs