



DoD SKILLBRIDGE

Participant Ethics Brief

8-Oct-20

Avoiding Conflicts of Interest in Selection of SkillBridge Partner Companies

- Placement with a Partner is a financial interest in that company
- Per 18 USC § 208, you will not be able to take official DoD/ Service action that would affect Partner's financial interests
- Similar to interviewing with Partner or situations where a Reserve officer works for Partner
- You cannot represent Partner to DoD/ Service
- You cannot represent DoD/Service interests back to Partner

Avoiding Conflicts of Interest in Selection of SkillBridge Partner Companies (cont.)

- Selection of a SkillBridge Partner is subject to same rules as Post-Government Employment
- Don't request placement with a Partner company that you would not be able to work for post-service
- No “switching sides” on a particular (named) matter between Partner and DoD/Service (e.g., bid proposal, contract, grant, investigation, claim, litigation)
- No placement with Partner if worked a particular matter involving Partner either personally and substantially or that was worked by employees under your official responsibility

Other Restrictions on Acceptable Partner Companies

- Both for-profit and nonprofit (501(c)(3)) companies are generally acceptable
- DoD Contractors may implicate Conflict of Interest rules and are a Prohibited Source under Ethics rules
- Placement with Religious organizations are acceptable, but organizations must show proof of vacancy available upon start of opportunity
- Placement with Political organizations (e.g., lobbyist firms, political parties, PACs) are not acceptable
- Placement with companies that primarily manufacture or distribute cannabis are not acceptable

Status as Military Members

- Placement with a SkillBridge Partner is similar to working on Terminal Leave
- As a SkillBridge intern, you do not represent DoD/Service interests
- As an intern, you are not appointed as a JER 3-201 official DoD/Service Liaison Officer
- Generally, should not wear your uniform to Partner workplace, official events and social events
- Should avoid arranging special privileges for Partner employees (e.g., flight line tours, orientation flights)
- SkillBridge model is for Service Members to expend all Leave & Househunting PTDY before starting SkillBridge PTDY period

Acceptance of Gifts from SkillBridge Partner Companies

- General Rule for Federal Employees is that we may not accept gifts: (1) from Prohibited Sources; or (2) Given to us because of our official position
- Can accept customary travel and lodging and meals as part of interview/placement interview trip
- Cannot accept salary, benefits, bonuses, stock options, housing/living/clothing allowances from Partner
- Signing of Future Employment Agreement requires legal review
- Since Military duties usually completed, 31 USC § 1353 gifts of travel benefits to the Government for your travel is uncommon

Acceptance of Company “Perks” from SkillBridge Partner Companies

- You can accept modest food and refreshments at work (e.g., partake from company-supplied coffee mess) (No alcohol)
- You can accept in-kind* gym, cafeteria, onsite childcare, etc. privileges in same manner as Partner employees
- You can accept in-kind* tuition assistance for short-term (NTE 14 days) training classes, professional examinations and professional certification programs
- You can accept free meals and attendance at social events/receptions (which may include alcohol) taken in a group setting in same manner as Partner employees

Acceptance of Company “Perks” from SkillBridge Partner Companies (cont.)

- Spouses may attend company social events if other Partner employees have a spouse or guest in attendance
- * “In-kind” means that the Partner should supply the benefit directly to SB personnel or the Partner should pay a third party service provider
- No funds for such “perks” should be paid directly to SB personnel
- You cannot accept Domicile-to-Duty transportation (even in-kind transportation such as a company-owned car) from Partner
- You may accept Partner-provided shuttle van/bus service from housing common areas in same manner as Partner employees