

KNOW BEFORE YOU GO

A PLAIN ENGLISH GUIDE TO ETHICS RULES FOR BUSINESS TRAVEL AND ATTENDANCE AT CITY JOB- RELATED EVENTS



In our City jobs, we may be invited to travel out-of-town on City business or to attend a conference in the Chicago area, and a third party* has offered to pay our travel and/or registration costs. In most cases, this is fine. But there are steps we need to follow and ethics rules we need to “know before we go.” This brief guide summarizes them.

*A third party means a person or entity **other** than the City itself or the City employee or official him- or herself.

The City's Governmental Ethics Ordinance allows us, as City employees or officials, to accept materials or reasonable travel expenses from a third party to attend meetings or public events or make appearances related to our official responsibilities or to public or governmental educational purposes.

The City's ethics laws require that: (i) before we accept and attend, we receive approval from the Board of Ethics; and (ii) within 10 days after our travel is complete, we report it to the Board of Ethics in writing. [Note: by long-standing arrangement, Mayoral travel is disclosed on the Mayoral log, which is kept in the Mayor's Office.]

The City's ethics laws also allow us to accept reasonable hosting expenses, including travel, food and/or refreshments, for meetings, appearances, or public events or ceremonies related to official City business, if offered by third parties. But: (i) the third party offering these expenses must be the “sponsor” of the meeting, event, or ceremony (not merely a person who buys a table); (ii) before we accept and attend, we must receive approval from the Board of Ethics; and (iii) within 10 days of the meeting or event, we need to report our acceptance in writing to the Board.

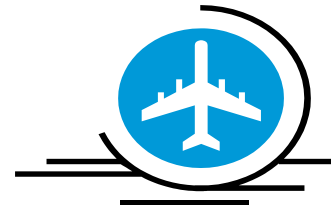
Other than Mayoral acceptances, the Board posts all such disclosures here: <http://www.cityofchicago.org/city/en/depts/ethics/provdrs/reg/svcs.html>

Remember that your department may have rules that prohibit you from accepting a particular invitation, so always check with your department's ethics officer first. Travel must also conform to the City's Official Travel Policy, administered by the Office of Budget & Management: <http://my.cityofchicago.org/dam/intranet/departments/obm/TravelForms/COCTravelPolicy093016.pdf>

City employees and officials are not allowed to accept any “honorarium”--gifts or money offered for participating in speaking engagements, lectures, conferences or panels in the course of our City jobs.

We urge to you seek approval or advice from the Board of Ethics as soon as you can. Try not to wait until the day before your travel or meeting.

FAQs:



1. I'm a City official. I've been invited to a ground-breaking ceremony and reception following for a new building for an organization located in my Ward. May I accept and attend? Must I receive advance approval? Yes, you may attend the ceremony and reception and eat and drink. However, you must receive **advance** approval from the Board of Ethics and then report it to the Board within 10 days **after** the event. You can call the Board and speak to an attorney here or email us at steve.berlin@cityofchicago.org. You'll get our answer almost immediately.

2. Will the Board approve my travel request? The Board will approve your acceptance if the event is related to your official City responsibilities and the expenses offered are reasonable. For example, if it would be expected that someone from your office or City government would attend, then it's going to be approved. We'll email you the approval if you wish.

3. How do I report my attendance? Within 10 days after the event, you must send the Board written notification of your attendance. You can send either a memo or email, stating, for example: "Please be advised that, on April 1, 2022, in my official capacity I attended a ground-breaking ceremony and reception hosted by [the ABC Organization]. I was invited by [the ABC Organization]."

4. What if all attendees are offered a bag of assorted "stuff," like coffee mugs, t-shirts, pens, etc.? Can I keep this "swag bag?" Yes, if it's worth less than \$50, but make sure you conform to any relevant departmental rules.

5. I'm a City employee. I've been invited to fly to California for 3 days of training related to my job. My course registration and travel expenses will be paid by DEF, Inc., a vendor of my department. Can I accept and attend? If you provide the Board with your department head's approval, and in their judgment, the training is necessary, then the Board will approve your request. Remember: (i) you may accept only reasonable travel expenses, like air, lodging, ground transportation, registration and meals included for registrants, but **nothing in addition**, like entertainment or golf; and (ii) within 10 days after you return, you must send the Board written notification of your attendance, including who went, where, when, what the course was, and who paid. You need not include itemized expense lists for the Board.

6. What does "reasonable travel" expenses mean? It means only those expenses paid by a third party that are directly related to your trip's or meeting's business purpose. Optional entertainment or golf you must pay for yourself. See City's Office of Budget & Management also has a travel guide for City personnel.

7. I'm a stamp collector and was invited by the American Philatelic Society to speak about my stamp collection at its annual meeting in Philadelphia. The Society will pay for my travel expenses. Can I accept? Yes. The Ordinance allows us to accept travel, food, etc. related to our outside business, employment, or community activities, as long as they were not offered because of our City position, and would customarily be provided to others.

8. What if the Society offers me an honorarium or cash for my presentation? Can I accept it? Yes. The Ordinance prohibits us from accepting an honorarium for speaking at conferences, etc. *in the course of our City employment or service.* This is related to your non-City employment or outside activity, and is not prohibited, as long as it was not offered to you because of your City position.

9. Do I need to report my acceptance of this travel or my Society honorarium to the Board of Ethics? You do not need to report the travel, but, if you file an annual Statement of Financial Interests form, you will need to report the honorarium there if it's more than \$250.

10. What if I'm paying for my own City-related business or educational travel? You will not need approval from the Board of Ethics, nor will you need to report your travel to the Board after it's completed. However, you still may not accept any honorarium, and gifts or "swag" (like coffee mugs, canvas bags, etc.) must be limited to \$50 from a single source.



SUMMARY: Remember these steps before you respond to a third party business travel or educational invitation, or third-party invitation to a City-related event that will involve an entrance fee, food or drink:

1. Call us or email us the invitation. You must also receive your department's approval for travel or training.
2. If you receive our approval, go and enjoy, but remember that you may not accept an honorarium.
3. Upon your return, remember also to send the Board of Ethics a follow up memo or email disclosing who went, who paid, what the event or course was, when and where. Itemized expense lists need not be sent.

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