

Starkey, Lois A

From: Starkey, Lois A
Sent: Monday, November 20, 2017 1:59 PM
To: Danner, Pamela B
Subject: FW: Question-Guidance Needed

Pamela.. See below, with the entire email chain regarding the ethics inquiry.

Lois Starkey, Program Analyst
Office of Manufactured Housing Programs, HUD
202-402-5613
www.hud.gov/mhs

From: Starkey, Lois A
Sent: Tuesday, August 01, 2017 11:28 AM
To: Baxter, Daniel P <Daniel.P.Baxter@hud.gov>
Cc: Allen, Lindsey A <Lindsey.A.Allen@hud.gov>; Slye, Brandi M <Brandi.M.Slye@hud.gov>; Danner, Pamela B <Pamela.B.Danner@hud.gov>
Subject: RE: Question-Guidance Needed

Thank you, all, for the prompt response to my inquiry.

Sincerely,

Lois Starkey

From: Baxter, Daniel P
Sent: Tuesday, August 01, 2017 10:17 AM
To: Starkey, Lois A <Lois.A.Starkey@hud.gov>
Cc: Allen, Lindsey A <Lindsey.A.Allen@hud.gov>; Slye, Brandi M <Brandi.M.Slye@hud.gov>
Subject: FW: Question-Guidance Needed

Lois,

You have asked whether it is permissible for you to accept severance pay from your previous employer, Manufactured Housing Institute (MHI), totaling two months of your annual salary to be paid over 4 months. The last payment will be September 15, 2017. You began work at HUD on July 24, 2017. Another employee who left your previous organization around the same time that you did also received the same severance package. On occasion, the MHI does contact the Office of Manufactured Housing Programs with questions and concerns and also meets with the Administrator of OMHP. However, you do not work directly with MHI. Based on this information, you are permitted to receive the payments agreed upon in your severance package from MHI since it appears they are based on your prior work and not your position at HUD.

Because your office works with MHI on occasion, please keep in mind the following regulations regarding your conduct with respect to your former employer. The Standards of Ethical Conduct regulation at 5 C.F.R. 2635.502 prohibits an

employee from participating in a particular matter involving specific parties if it is likely to have a direct and predictable effect on the financial interest of a member of the employee's household or knows that a person with whom she has a covered relationship is or represents a party to such matter and where the employee determines that the circumstances would cause a reasonable person with knowledge of the relevant facts to question her impartiality. A particular matter involving specific parties includes specific matters such as grants and contracts where there are identifiable parties. An employee has a covered relationship with a person for whom the employee has, within the last year, served as an employee. Please let us know if you have any questions.

*Daniel Baxter
Acting Deputy Assistant General Counsel
Ethics and Appeals Division
Office of the General Counsel
U.S. Department of Housing and Urban Development
202-402-2089*

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From: Starkey, Lois A
Sent: Tuesday, August 01, 2017 9:30 AM
To: Slye, Brandi M <Brandi.M.Slye@hud.gov>
Subject: RE: Question-Guidance Needed

Not directly. The work I perform impacts the standards and regulations that MHI members (manufacturers, retailers) are required to meet.

From: Slye, Brandi M
Sent: Tuesday, August 01, 2017 9:28 AM
To: Starkey, Lois A <Lois.A.Starkey@hud.gov>
Subject: RE: Question-Guidance Needed

Does any of the work that you perform affect MHI? If so, how?

From: Starkey, Lois A
Sent: Tuesday, August 01, 2017 9:16 AM
To: Slye, Brandi M <Brandi.M.Slye@hud.gov>
Subject: RE: Question-Guidance Needed

Yes, on occasion, MHI staff meet with the Administrator of OMHP or contact OMPH with questions, concerns, etc. MHI staff participates in meetings hosted by OMPH such as the Manufactured Housing Consensus Committee, and the regional meeting of State Administrative Agencies.

From: Slye, Brandi M
Sent: Tuesday, August 01, 2017 8:52 AM
To: Starkey, Lois A <Lois.A.Starkey@hud.gov>
Subject: FW: Question-Guidance Needed