



BPA Business Conduct Handbook for Contract Personnel

Make smart choices, know the rules



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A Message From BPA's Chief Supply Chain Officer

Contract Staff,

Welcome to the Bonneville Power Administration. We are pleased you have chosen to accept an assignment working for the nation's number one provider of clean, carbon-free energy. BPA provides many opportunities for contract personnel to work alongside federal employees. The work you are asked to perform as part of your assignment is important in helping BPA fulfill its mission-critical responsibilities. We have asked your employer to provide you with a copy of this handbook. This handbook is also posted to the Supplemental Labor Management Office Web page on BPA's intranet.

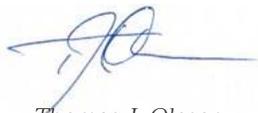
BPA is a national leader in energy efficiency and renewable wind integration, and co-manager with our tribal, federal and state partners of one of the largest habitat protection and restoration programs in the world. As a public agency, BPA must safeguard the assets of the Federal Columbia River Power System for the benefit of the region and its inhabitants. Everyone working at BPA, both federal employees and contact personnel, must work diligently to uphold the public trust, adhere to the highest ethical and professional standards and comply with all laws.

*BPA employees are all subject to Standards of Ethical Conduct for Employees of the Executive Branch, the Hatch Act and other internal operating BPA policies. These Standards of Ethical Conduct for Employees of the Executive Branch do not apply to contract personnel. **HOWEVER**, certain BPA policies and the General Services Administration rules and regulations governing conduct on federal property apply to all persons entering a federal facility. Those policies, rules and regulations are summarized in this handbook. Additionally, this handbook describes how certain federal rules and regulations, such as federal employee restrictions on accepting gifts, may affect you.*

This handbook includes frequently asked questions that you can refer to during the course of your assignment at BPA. It directs you to the underlying policies, regulations and resources where you can find more information. Your employer may have also provided you with its own employee handbook. If you have questions about either handbook, please contact your employer.

As you make choices during the course of your BPA assignment, remember to ask questions and seek clarification. If you observe behavior that you believe is unethical, talk to your employer. You may also use one of the resources listed in the Help and Information section of this Business Conduct Handbook for Contract Personnel. I urge you to become familiar with these resources.

Sincerely,



*Thomas J. Olesen
Chief Supply Chain Officer*

Introduction

About the BPA Business Conduct Handbook for Contract Personnel

The BPA Business Conduct Handbook for Contract Personnel outlines BPA's expectations regarding the conduct of contract personnel on or near or in conjunction with any contract assignment associated with BPA. This includes areas in and around BPA buildings, facilities, fitness centers, vehicles, food service areas, break locations, and other areas where BPA employees and contract personnel work or where work-related activities occur, including official travel.

The information contained in this handbook is a summary of existing federal rules and BPA policies that apply to contract personnel. Some of the rules and regulations described in this handbook apply to all property under the charge and control of the General Services Administration and apply to all persons entering on such property. Other policies that apply to contract personnel can be found in the BPA Manual, BPA Personnel Letters and Bonneville Purchasing Instructions. While this Handbook covers the most common issues, it does not cover everything. Questions regarding the content of this document should be directed to your employer.

Know Your Responsibilities

Contract personnel must know, understand and comply with the BPA Business Conduct Handbook for Contract Personnel and the underlying regulations and policies. Additional information on how to operate within the BPA environment can be obtained from the Supplemental Labor Management Office Operations Handbook, which focuses on the day-to-day aspects of a contract assignment. That document, as well as other useful information, can be found on the Contract Worker Resources website at: <http://internal.bpa.gov/sites/slmo/CW/default.aspx>.

Contract Personnel Compliance with BPA Policies

This summary is provided to you by your employer to assist you. However, it is incumbent on you to comply with the complete regulations and policies underlying this summary. Contract personnel are encouraged to consult their employers and underlying source documents for complete information and guidance. Refer to the Help and Information section at the end of this document for a list of the underlying source documents and their corresponding websites. Failure to comply with the rules and regulations in the BPA Business Conduct Handbook for Contract Personnel is a serious matter and could result in termination of your assignment at BPA or in serious situations criminal charges.

Your employer may have issued you an employee handbook. Consult your employer regarding the information contained in its employee handbook. In the event there is a conflict between the BPA Business Conduct Handbook for Contract Personnel and your employer's handbook, contact your employer for guidance.

Be Proactive: Prevent and Report Concerns

Contract personnel are responsible for promptly reporting actual or potential wrongdoing, including actual or potential violations of law, regulation, policy or procedure. Report conduct concerns and work to resolve them by talking to your employer.

You may also contact the BPA Hotline. The BPA Hotline is operated by a third- party vendor under contract to BPA. Calls to the BPA Hotline may be anonymous at your request. This applies to concerns you may have for yourself or your coworkers. More information on the BPA Hotline is available in the Help and Information section of this handbook.

Retaliation

BPA expressly prohibits any form of retaliation against contract personnel who report suspected violations of the BPA Code of Conduct, the Business Conduct Handbook for Contract Personnel or federal law or regulation. If you believe you have been retaliated against, report it to your employer. You may also report retaliation to the BPA Hotline. Any report of retaliation will be investigated.

Personal Conduct

Harassment-free Workplace

Contract personnel are covered under BPA's harassment-free workplace policy. Contract personnel are responsible for maintaining a respectful, professional and harassment-free workplace.

BPA policy defines harassment as any unwelcome, inappropriate non-job-related conduct that causes a person to feel threatened, intimidated or distressed in his or her work environment. This includes making false accusations of harassment with the intent of harming someone. Non-job-related conduct means the conduct is not part of the successful performance of assigned duties.

BPA managers and supervisors have the primary responsibility to create and sustain a harassment-free work environment by setting an example, providing training and having discussions about proper conduct.

BPA managers and supervisors must:

- Take immediate action to stop harassment.
- Protect the individuals targeted by harassment.
- Take all reasonable steps to ensure that no further harassment or retaliation occurs.

In meeting these responsibilities, BPA management officials may not be able to maintain the confidentiality of contract personnel reporting harassment.

Contract personnel are responsible for:

- Refraining from harassing behavior;
- Taking personal action to resolve any instances of harassing behavior that affects them;

- Resolving harassment issues in as timely a manner as practicable;
- Participating cooperatively in any fact-finding concerning a complaint of harassment; and
- Promptly notifying management officials of harassing behavior if they are unable to get the accused to discontinue harassing behavior.

Your employer may have its own policy on handling harassment concerns. It is your first point of contact.

FOR MORE INFORMATION on BPA's harassment-free workplace policy, see BPA Personnel Letter 752-3 at: www.bpa.gov/ebr/personnelservices/PLetters/PL752-3.doc.

Violence-free Workplace

Violence and threats of violence can cause emotional trauma to everyone involved in the incident, including the targets, witnesses and the perpetrator. BPA policy prohibits violence and threats of violence against co-workers, managers, contract personnel and the public. Violence includes such acts as:

- Physical assaults against persons or property.
- Holding a person captive.
- Abusive verbal behavior.

Threats of violence can be direct or implied. Threatening behavior can include provoking, harassing and veiled threats that would be taken seriously by a reasonable person.

Respond to imminent threats of violence and threatening behavior by immediately:

- Securing your own safety and assisting in securing the safety of others in the area.
- Calling 911 for police or medical assistance (dial 7-911 at headquarters, 8-911 at Ross and 6-911 at Van Mall to ensure security is aware of the emergency).
- Notifying a BPA supervisor or manager.

Respond to non-imminent threats of violence and threatening behavior by reporting the situation immediately to your employer and documenting your observations.

FOR MORE INFORMATION on BPA's violence-free workplace policy, see BPA Personnel Letter 752-2 at: www.bpa.gov/ebr/personnelservices/PLetters/PL752-2.doc.

Discrimination-free Workplace

Discrimination may occur when someone is treated differently from others because of his or her race, age, color, religion, sex, national origin, disability, marital status, political affiliation, sexual orientation, group membership, outside affiliations, personal beliefs, personal traits or any other non-merit factor.

As contract personnel, any actions or events that you feel are discriminatory must be raised first with your employer. In limited circumstances, you may be able to use the federal Equal Employment Opportunity process. Be aware that the federal discrimination complaint process is different from the private sector process. Contact BPA's Civil Rights/EEO Office if you have questions about the federal process.

If you believe you have an Age-Discrimination in Employment Act complaint (if you are 40 years of age or older) or an Equal Pay Act complaint, you have the option to

file directly in Federal District Court. Because your complaint would be against your employer and not BPA, you need to consult with your employer's Human Resources or EEO Office for further guidance.

(The timelines for filing the various types of complaints differ. For example, the Equal Employment Opportunity Commission has established a 180-day deadline for filing a private sector complaint. See EEOC.gov for more information for guidance on private sector complaints of discrimination.)

FOR MORE INFORMATION on BPA's discrimination-free workplace policy, see the EEO/Civil Rights Web page at: <http://internal.bpa.gov/EmployeeCenter/ConflictManagement/Pages/ConflictManagement.aspx>.

Alcohol and Illegal Drugs

You must be able to work safely and efficiently when you report for duty and must remain fit for work during your work hours. BPA policy prohibits the possession and/or use of alcohol, narcotics or illegal drugs on BPA property. In addition, BPA policy prohibits:

- Entering BPA property under the influence of or using or possessing alcohol, narcotics or illegal drugs.
- Operating a BPA or GSA-owned, leased or rented vehicle under the influence of alcohol, narcotics or illegal drugs.
- Operating any vehicle on BPA property or in duty status under the influence of alcohol, narcotics or illegal drugs.

FOR MORE INFORMATION on BPA's alcohol and illegal drugs policy, see BPA Manual Chapter 400/792A at: www.bpa.gov/EBR/BPAManual/toc.htm.



Alcohol and Illegal Drugs

Q. May I smoke Marijuana while on duty status?

A. No. Although Marijuana is legal in some states, it is illegal at the federal level. Being under the influence on federal property is illegal and could result in termination of your BPA assignment.

Q. Are there job-related consequences to drinking when I am off duty?

A. While not prohibited, consuming alcohol on your personal time could have job consequences. For instance, if you consume alcohol while on personal time yet report to BPA under the influence of alcohol, you may not be able to perform your assigned duties. Another example would be the loss of a driver's license by contract personnel whose position requires him or her to have a valid driver's license. If that should occur, BPA may end the assignment for failing to maintain a condition of assignment.

- While performing their assigned duties or on BPA property.
- In government vehicles.
- In government aircraft.
- In any private vehicle located on BPA property for any reason.
- In any private vehicle currently being used in conducting BPA business or activities (e.g., the vehicle is situated on a BPA work-site or is being used while actively representing BPA to the public).

Excluded from this policy is the possession, transportation, storage, and/or use of BPA-owned explosives or contractor-provided explosives employed in lawful and appropriate construction and maintenance activities (e.g., blasting tower footings, building foundations and in road construction).

FOR MORE INFORMATION on BPA's firearms and other deadly weapons policy, see BPA Manual Chapter 1086 at: [http://internal.bpa.gov/Policy/BPA Manual/00001086.DOC](http://internal.bpa.gov/Policy/BPA%20Manual/00001086.DOC).

Texting While Driving

BPA policy prohibits any form of texting while driving. The prohibition on texting includes while driving in contractor-owned or rented vehicles, government-owned vehicles or privately-owned vehicles when performing any work for or on behalf of the government. Texting is prohibited while on an active roadway including while the vehicle is temporarily stopped because of traffic, at a traffic light, stop sign, or otherwise. The definition of “texting” includes:

- Reading from or entering data into any handheld or other electronic device for the purpose of texting, emailing, instant messaging, or obtaining navigational information.
- Engaging in any other form of electronic data retrieval or electronic data communication.

FOR MORE INFORMATION on texting while driving, see Bonneville Purchasing Instructions, Part 3 — Standards of Conduct and Business Practices at: www.bpa.gov/Doing%20Business/purchase/Documents/BPI03.pdf.

Social Media

BPA uses social media technologies such as Facebook, Twitter and YouTube to enhance public communication and information exchange to support BPA's mission. Contract personnel may share their comments, ideas and concerns. All posted comments are in the public domain. Users are responsible for any and all comments that they submit. Personal opinions are not to be portrayed as official BPA positions.

Contract personnel commenting on BPA social media sites are expected to:

- **Stay focused.** All viewpoints are welcome, but comments should remain relevant to BPA or BPA-related topics.
- **Be respectful.** Personal attacks, profanity, aggressive behavior or unsupported accusations are harmful to the conversation.



Texting While Driving

Q. May I use a navigational device while driving?

A. You may use a navigation device only if it is secured in a commercially designed holder affixed to the vehicle. The destination and route must be programmed into the device either before driving or while stopped in a location off the roadway where it is safe and legal to park.

Q. Are there job-related consequences to texting while driving a government vehicle or privately-owned vehicle while on official government business?

A. Yes. BPA may elect to terminate an assignment if contract personnel text messages while driving a contractor-owned or rented vehicle, government-owned vehicle or privately-owned vehicle when performing any work for or on behalf of BPA.

- **Add value.** Comments should be relevant. The best way to be interesting and garner attention is to write about what you know. If you have a deep understanding of something, talk about the benefits, challenges and issues around it.
- **No Spam.** Repeated posting of identical or very similar content or promoting products or services is counterproductive.

FOR MORE INFORMATION on BPA's social media policy, see BPA Manual Chapter 1140 at: www.bpa.gov/EBR/BPAManual/toc.htm.

Use of the BPA Name and Logo

You cannot use the BPA name or logo for personal gain or the gain of a friend, relative, business associate or nonfederal entity. Further, you cannot use your position or title in a way that could imply BPA endorses your personal activity, such as using your assignment at BPA to engage in charitable fundraising.

Information Protection

Identification and Protection of Sensitive Information

Contract personnel have responsibility to identify and protect sensitive information. Contract personnel shall maintain current knowledge of the procedures used to identify and protect sensitive information that they originate, handle, store, share and/or destroy. There are two types of sensitive information: OFFICIAL USE ONLY and Critical Information. Contract personnel are responsible for taking annual information protection training, which teaches and refreshes contract personnel how to properly identify sensitive information, mark the information they generate and notify information owners

when sensitive information is discovered on an external BPA Web page or any other inappropriate activity regarding sensitive information (not properly destroying, not limiting access, sharing inappropriately, etc.).

Physical Access to Sensitive Information

Contract personnel are responsible for safeguarding sensitive information in their custody or under their control. The extent of protection afforded sensitive information should be sufficient to reasonably prevent the possibility of its loss or compromise, inadvertent or unauthorized disclosure or modification. Physical access to sensitive information must be controlled and access should only be provided to those persons who have a need to know. In other words, they require the information to perform their assignment or other BPA authorized activities. Responsibility for determining whether someone has a valid need for such access rests with the person who has authorized possession, the owner/author, or the person who has knowledge or control of the information.

FOR MORE INFORMATION on identification and protection of sensitive information, see Information Protection Chapter 300–2 at: <http://internal.bpa.gov/Policy/Security/Documents/Chapter%20300-2,%20Information%20Protection.pdf>.

Conflicts of Interest

The federal employee conflict of interest statutes may apply to contract personnel in certain circumstances. The Bonneville Purchasing Instructions Part 3.4 addresses organizational conflicts of interest. Contract personnel should follow the direction given in this policy regarding organizational conflicts of interest, including reporting any potential conflicts to the Supplemental Labor Management Office. Failing to do so could result in disqualification from federal work. Additionally, contract personnel are prohibited from accepting a bribe or gratuity (18 U.S.C. 201). Release of certain information before and after a contract award may be prohibited. Consult the assigned contracting officer or Bonneville Purchasing Instructions for more details.

The Procurement Integrity Act (41 U.S.C. 423) prohibits contract personnel from knowingly disclosing contractor bid or proposal information or source selection information before the award of a federal agency procurement contract to which the information relates. Contract personnel are encouraged to contact their employer for guidance.

Use of BPA Supplies and Equipment

Use BPA supplies and equipment for official purposes only, not personal use. This includes office supplies and tools that are used at field locations. BPA supplies and equipment should only be used to perform assigned duties. You may not use BPA supplies and equipment for unauthorized purposes.

Use of Telephones, Computers and Other IT-Related Equipment

While the use of some BPA resources for personal use is prohibited, there is an exception when it comes to Information Technology equipment. IT equipment includes

any computing device or component that can be attached to or interact with BPA's computer network, such as desktop computers and monitors, laptops, software, personal digital assistants or other handheld instruments, telephones, cell phones, fax machines, pagers, copiers and printers.

Limited personal use of BPA IT resources is acceptable if it:

- Does not interfere with your job performance.
- Involves little or no operating cost to BPA.
- Does not reflect badly on BPA. All communication must be businesslike.

You may use BPA IT equipment for limited personal use. This means you can use BPA's IT equipment before the workday, during lunch breaks and after the workday (see below for some exceptions that also permit limited usage during work hours).

This allowance for limited personal use of BPA's IT equipment is not a right. Rather, this is an allowance that can be limited or revoked at any time for any reason. Under no circumstances should BPA equipment be used to conduct personal business activities or other business activities other than for BPA.



Use of Telephones, Computers and Other IT-Related Equipment

Q. May I pay my bills online using a BPA computer before I begin work?

A. No. You cannot make financial transactions online at any time using BPA IT equipment.

Q. I have a BPA issued cell phone. May I use my BPA cell phone for personal text messaging?

A. The same limited use policy applies to use of a BPA cell phone whether you are making a telephone call, sending an email or text messaging. Contract personnel texting and emailing using a BPA issued cell phone or PDA have no expectation of privacy. BPA retains the right to review all text and email messages sent and received from BPA cell phones and PDAs.

Q. I am having a garage sale this weekend. May I use a BPA copy machine after work to copy flyers for distribution in my neighborhood?

A. No. You may use BPA copiers to make convenience copies of documents. You may not use the copier to print multiple copies of documents for your personal use whether it is for a garage sale, school fund raiser, not for profit organization or any other activity that is not related to your assignment at BPA.

Monitoring Computer Use

BPA retains the right to monitor the use of its IT equipment. The agency does this in full compliance with the law. This monitoring promotes safety, prevents criminal activity, aids in the investigation of alleged misconduct and security breaches and helps manage information systems.

Even though BPA has a limited personal use policy, contract personnel have no right or expectation of privacy when using BPA's IT equipment. Any use or information on BPA's IT equipment is accessible by BPA even if it is password-protected or has been deleted.

Limited Personal Use of BPA's IT Equipment

The following sections highlight some of the conditions for limited personal use of BPA's IT equipment. All of the conditions are covered in BPA Manual Chapter 1110 and the Cell Phone Limited Personal Use Policy to supplement BPA Manual Chapter 1110. Keep in mind that the information presented in this Business Conduct Handbook for Contract Personnel is a summary, and it is incumbent on all contract personnel to abide by all the conditions in BPA Manual Chapter 1110 and the supplement. If you have any questions about the proper use of your computer or other electronic equipment, refer to these policies or contact the Supplemental Labor Management Office or your employer.

Email and Wired Telephones

Occasionally during work time, contract personnel may use BPA email and telephones, including voicemail, to contact family members and others regarding work or school schedules, doctor appointments and other similar communications that cannot be conducted during non-work hours. Occasional use of email and wired telephones during work hours is permissible up to 10 minutes unless otherwise authorized by a BPA supervisor or manager.

Email Display Name

The Department of Energy guidance stipulates that contract personnel identify themselves and their work products to avoid creating an impression that they are government employees. This includes ensuring that contract personnel identify themselves as such if using a ".gov" email address. BPA has implemented this guidance by adding BPA (for federal employees) and CONTR (for contract personnel) to display names in the email system. This ensures that BPA is operating in a transparent manner consistent with BPA's values. It also reduces the risk of contract personnel being mistaken as BPA employees by internal clients, customers, constituents, vendors and the public when sending email on the agency's behalf. Display names look like this:

Doe, John S (BPA) – NSP-WHSE (for federal employees) or

Doe, John S (CONTR) – NSP-WHSE (for contract personnel)

Internet

The Internet may be used for limited personal use only during non-work hours to access public libraries, newspapers, weather reports and similar publically available information. You may not use the Internet to conduct a job search, complete an employment application, make purchases or make personal travel arrangements.

Cell Phones

BPA issued cell phones and services are paid for by BPA for official use. Use of a BPA issued cell phone for personal use is not permitted except as follows:

- **Unplanned and extended work hours:** A five-minute cell phone call during work time if you are required to extend your work hours, and a wired telephone line is unavailable.
- **Emergencies:** Cell phone calls to 911, law enforcement authorities and medical support personnel.
- **Hazardous conditions:** A personal call of no more than five minutes in the event of hazardous conditions in which a delay in arrival or departure to a destination may cause concern.
- **Travel status:** Limited personal use of cell phones is allowed while on travel status, as governed by the BPA Travel Manual.
- **Other non-work related calls:** Under special conditions outlined in the policy, non-routine use of a cell phone is permitted if a wired phone line is unavailable.
- **Forwarding desk phone to cell phone:** Forwarding calls from a wired BPA telephone or other phone to a BPA cell phone for BPA business only must be approved by a BPA manager or supervisor.

Never Use BPA IT equipment to:

- Access, view or transmit sexually oriented or explicit material.
- Access, view or transmit material that a reasonable person would find offensive.
- Support an outside business or job.
- Gamble.
- Sell or purchase anything, such as on eBay or other shopping Web sites.
- Transmit financial transactions, such as moving money in a personal bank or credit union account, paying bills or making stock trades.
- Solicit donations.
- Conduct political activities.
- Conduct commercial business activities.

Consequences of Misuse

The misuse of BPA IT equipment and services poses a significant business risk and may compromise BPA's IT systems. Failure to satisfy your obligations under the IT policy may lead to the loss of system use and possible termination of a BPA assignment. Improper use of BPA IT equipment that is suspected of violating federal laws will be reported to the appropriate law enforcement agencies.

FOR MORE INFORMATION on proper use of telephones, computers and other IT-related equipment, see BPA Manual chapter 1110 at: www.bpa.gov/EBR/BPAManual/toc.htm.

Leaving Your BPA Assignment

Asking for a Reference

A BPA employee may sign a letter of recommendation for contract personnel using his or her official title only when the letter is in response to a request for an employment recommendation or character reference. The recommendation must be based on personal knowledge of the ability or character of: an individual with whom the BPA employee has dealt in the course of the contract personnel's assignment at BPA, or an individual he or she is recommending for federal employment.

FOR MORE INFORMATION on asking for a reference, see the U.S. Office of Government Ethics website — Use of Title or Agency's Name at: www.oge.gov/Topics/Use-of-Government-Position-and-Resources/Use-of-Title-OR-Agency%e2%80%99s-Name/.

Becoming a Federal Employee

The opportunity for inadvertent violation of the post-employment statutes and rules increases when contract personnel and BPA employees work side-by-side. Reasonable people who are aware of the circumstances may question the ability of former contract personnel, who become BPA employees, to be impartial in a particular matter concerning their previous employer. If, for example, former contract personnel continue to hold financial interests in their former employer, such as retirement benefits, stock, stock options, deferred compensation or other miscellaneous benefits, they may be required to disqualify themselves from official matters affecting the financial interests of their former employer.

Federal Records

Federal records are documents, data and recorded information in any medium (paper or electronic) that are created or received by an agency of the U.S. government in connection with or providing evidence of the agency's organization, mission, functions, policies, decisions, procedures, operation or other activities. They include drafts, working papers and electronic records.

If the document or information is created or received as part of your BPA assignment, it's a record and cannot be removed, copied or destroyed unless in the course of conducting official agency business.

Unlawful removal of federal records is a crime. If you are found guilty of unauthorized destruction or removal of federal records, you may be subject to criminal penalties, including fines, imprisonment or both.

Personal files or papers are those that are unrelated to the transaction of agency business: they are not considered federal records. These may include:

- Certain reference materials or vendor catalogs.
- Convenience copies, such as duplicates of publications.

Make certain you understand the rules before you decide to take files or papers off the premises or leave your BPA assignment. Violating the rules regarding release of



Leaving Your BPA Assignment

Q. May I tell my new employer what I know about BPA?

A. You may not share confidential or proprietary information that you learned at BPA. Otherwise, there are no federal regulations restricting contract personnel from sharing their knowledge of BPA with a new employer.

Q. May I keep personal files at work?

A. It is okay to keep a limited amount of personal files at work, but they must be kept separate from your work files and clearly designated as personal. You should also remember that merely labeling a file “personal” does not affect its status if the contents meet the definition of a federal record.

Q. I am ending my assignment at BPA. May I take source documents, such as work papers, notes and copies of emails, from projects I worked on during my assignment at BPA?

A. No. You may not take non-public information, whether on paper or in electronic form, when you leave BPA. The same rule applies whether you are a BPA employee or contract personnel.

confidential or proprietary information may have serious consequences. Release of certain types of information could violate the Procurement Integrity Act, the Trade Secrets Act or the Privacy Act.

Inappropriate release of protected information could subject contract personnel to civil or criminal penalties. If you are suspected of violating the regulations, you may be investigated by the Inspector General or Federal Bureau of Investigation or prosecuted by the Department of Justice. If you are found guilty, you may be subject to criminal fines, imprisonment or attorney fees.

FOR MORE INFORMATION on federal records, see BPA Manual Chapter 1150 at: [http://internal.bpa.gov/Policy/BPA Manual/00001150.doc](http://internal.bpa.gov/Policy/BPA%20Manual/00001150.doc).

Gifts

Gifts are anything of value, including discounts, entertainment and loans. Vendors and companies that are doing business or seeking to do business with BPA are “prohibited sources.” This includes contract personnel, whether they sit in an office, work on a line crew or consult with BPA as a subject matter expert.

Contract personnel should not give gifts to BPA employees. Gifts include anything that has monetary value, such as:

- Discounts.
- Meals.
- Training and travel.
- Gift cards.
- Services such as landscaping, plumbing or computer assistance.

Some items are excluded from the definition of a gift, so they may be accepted. The most common exclusions are modest refreshments, greeting cards or items of little intrinsic value, such as plaques or certificates.

Soliciting from Contract Personnel

BPA employees are prohibited from soliciting anything of monetary value either directly or indirectly from contract personnel for any reason. This includes special occasions or one-time events such as weddings, retirements or baby showers.

FOR MORE INFORMATION on gifts, see the Office of Government Ethics website — Gifts & Payments at: www.oge.gov/Topics/Gifts-and-Payments/Gifts---Payments/.

Political Activities in Federal Facilities

General Services Administration regulations prohibit solicitations for political activities on GSA property. The BPA headquarters building is GSA-owned. These regulations also prohibit any person on federally owned or leased property from posting any materials on bulletin boards or elsewhere on the property unless it is for official duties authorized by the government. Most other BPA facilities fall into this category. Federal regulations also prohibit any person on federally owned or leased property from distributing materials unless conducted as part of authorized government activities.

Issuing any form of an invitation to attend a political fundraising event is prohibited while you are on federal property. Soliciting or receiving any form of a political donation in connection with a federal, state, or local election while on federal property is a crime and may have serious consequences. If you are found guilty, you could be subject to criminal fines, imprisonment or attorney fees.

What you may not do:

- You may not use BPA property or equipment for partisan political activities.
- You may not wear or decorate BPA property with partisan political paraphernalia.
- You may not affix a campaign bumper sticker on a government vehicle.
- You may not use any personal digital assistant such as Blackberry's, iPhones or iPads to engage in political activity while on federal property. This includes equipment issued by BPA or your personal equipment.

FOR MORE INFORMATION see GSA Federal Management Regulation Subchapter C — Real Property Posting & Distributing Materials at: www.gsa.gov/portal/ext/public/site/FMR/file/Part102-_74.html/category/21859/#wp2017832.



Political Activities

Q. May I put a lawn sign in my car and park on BPA property?

A. No. You may put a single bumper sticker on your car and park on BPA property, but anything larger is not allowed

Q. May I run for a local political office as a partisan political candidate?

A. Yes. There is no federal prohibition on contract personnel engaging in partisan political activity when they are not on duty status performing services for BPA. However, GSA regulations prohibit all persons from soliciting political donations while on federal property, and you may not use BPA IT equipment to promote your candidacy.

Q. Can I send or forward a partisan political email from my work address to my personal email account while I am at work and in a federal building?

A. Yes. If you received a partisan political email in your work email account you may send that email to your personal email account.

Q. I am working in my government workspace. Can I use my smartphone to send or forward a partisan political email?

A. No. You cannot send a partisan political email from your smartphone while you are at work.

Help and Information

Resources for More Information

When you are unsure whether your actions comply with the Business Conduct Handbook for Contract Personnel, ask questions. There are several sources you can rely on for guidance. If you suspect misconduct or have questions, choose the option from the following list that you feel the most comfortable with or feel most appropriately matches the circumstances.

- Your first option is always your employer.
- The Supplemental Labor Management Office at supplementallabor@bpa.gov.
- The BPA Hotline at 800-440-2241 or <https://bpa.alertline.com>.

Web Sites for More Information

BPA Supplemental Labor Management Office: <http://internal.bpa.gov/Services/SupplementalLabor/Pages/default.aspx>

BPA Manual: www.bpa.gov/EBR/BPAManual/toc.htm

BPA Personnel Letters: www.bpa.gov/eb/personnelservices/ByNumber.htm

Office of Government Ethics: www.oge.gov

The Hatch Act: www.osc.gov/hatchact.htm

U.S. Office of Special Counsel: www.osc.gov/

Whistleblower Disclosures: www.osc.gov/

Rules and Regulations Governing Public Buildings and Grounds: www.la.nrcs.usda.gov/about/CR_Posters/Weapons_Title41.pdf

The BPA Hotline

The BPA Hotline is a tool to communicate concerns about suspected misconduct, ask a question or seek clarification. It is operated by a third-party vendor, and you can remain anonymous.

You may reach the hotline 24/7 from any location. Call the toll-free hotline at 800-440-2241 to speak to a communications specialist. To make a Web report, go to the ethics tab on BPA Connection or <https://bpa.alertline.com> and fill in the information fields. At the conclusion of your report, you will be given a report and PIN number. You can use them to provide BPA with additional information or check the status of your report.

FOR MORE INFORMATION go to www.bpa.gov/Contact/Ethics.

Reporting Fraudulent Behavior

If you suspect fraud, you must report it. Fraud is defined as deceiving or taking advantage of the U.S. government and includes such things as embezzlement, theft, bribery, forgery and making false statements. If you know of or suspect wrongdoing, promptly report it to one of the following:

- BPA Manager of Internal Audit at 503-230-4135
- DOE Office of the Inspector General at 800-541-1625
- BPA Security and Emergency Management (if theft is involved)
- Law enforcement entities
- Your employer

If you are not sure who to contact, call the BPA Hotline or make a Web submission. After your report is received it will be reviewed and sent to the appropriate organization for action.

FOR MORE INFORMATION on fraud, see BPA Manual Chapter 145 at: www.bpa.gov/EBR/BPAManual/toc.htm.



The BPA Hotline

Q. Do I have to contact the hotline during business hours?

A. No. The hotline is available 24 hours a day, 365 days a year. You may call from any location or use any computer to make a Web submission.

Q. If I call the hotline, do I have to give my name?

A. No. You can remain anonymous. However, it may be more difficult to investigate your concern if BPA cannot contact you for more information.

Q. How will I know that BPA has taken action on my report?

A. At the conclusion of your report you will be given a report and PIN number. You may use that information to check on the status of your report. Even if you make an anonymous call or Web submission, BPA can communicate with you by asking questions or give you a status report on your call or Web report. Responding to questions BPA asks, reviewing your status report or supplementing your initial report will not reveal your identity unless you choose to do so.

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