

Ethics Handbook



Jet Propulsion Laboratory

**“You cannot make
yourself feel some-
thing you do not feel,
but you can make
yourself do right in
spite of your feelings.”**

PEARL S. BUCK

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Introduction

The Caltech Code of Conduct and JPL Values are the cornerstones of our ethics and business conduct requirements. They could be summarized as “do the right thing.” Sometimes, however, the right thing is not obvious in today’s complex business environment. It is important to have acknowledged and accepted standards of conduct to assure that both collective and individual behavior will be consistent with Laboratory objectives and policies.

JPL’s core values are openness, integrity, quality, and innovation. We believe that good business relationships rely upon a shared commitment to these values. We expect our employees to embrace these values, and in return, our stakeholders should expect JPL employees to model these values and to conduct business ethically.

This handbook summarizes, in one publication, the ethical guidelines we must follow while conducting Laboratory business. Become familiar with its contents and use it as a guide when you are unsure of what actions to take. Remember, however, it is a summary and you are responsible for familiarizing yourself with all the ethics requirements located in JPL Rules!, which are subject to periodic revision and update. In addition, some topics with ethical implications, such as sexual harassment and discrimination, are not covered in this handbook. These behaviors are strictly prohibited and should be promptly reported to Human Resources. The Employee Assistance Program (EAP) can assist employees with interpersonal issues, conflicts, problem resolution, and employee health and wellness support.

our values

- Openness of our people and our processes. We use candid communication to ensure better results.
- Integrity of the individual and the institution. We value honesty and trust in the way we treat one another and in the way we meet our commitments.
- Quality of our products and our people. We carry out our mission with a commitment to excellence in both what we do and how we do it.
- Innovation in our processes and products. We value employee creativity in accomplishing tasks.



The 11 Principles

As members of the Caltech community, we embrace the letter and the spirit of these principles. Each member is personally responsible for incorporating these principles into their own actions and is encouraged to speak up if they, in good faith, believe the Institute or any individual is falling short of living up to them. We are proud of Caltech and to share the community's commitment to these values.

1. Strive for Excellence

- We commit to excellence in all things in process as well as outcomes, knowing that only the process is truly under our control.
- Responsibility and accountability are the hallmarks of our community.

2. Act with Integrity

- We uphold integrity in all we do.
- We hold ourselves accountable for the outcomes of our actions.

3. Encourage Open, Honest, and Respectful Discourse

- We encourage open, honest, and respectful discourse from and between all members of the community, regardless of position, length of service, or role.
- We treat one another with civility.

4. Respect and Promote Freedom of Inquiry

- We encourage curiosity in research, scholarship, and exploration, and we create the conditions where inquiry can flourish.

5. Foster a Supportive and Diverse Community

- Every member of the Caltech community treats one another with dignity and respect.
- We value different perspectives, opinions, and ideas.
- We enable one another's excellence.
- We support the health and wellness of all community members.

6. Commit to Education

- The opportunity for excellence in education exists at all levels and in formal and informal ways that benefit students, employees, and members of our community.
- We are committed to being great educators—as leaders, mentors, and friends—not only of our students, but also of our community, our peers and colleagues, and ourselves.

7. Conduct Work Responsibly

- We fulfill the obligations of our role.
- We are responsible stewards of the Institute resources entrusted to us, including the environment, equipment and facilities, money and people.
- We respect the environment and are conscious of our impact.

8. Protect the Interest of Those Who Place Their Trust in Us

- We are forthright with our students, their parents, employees, managers, and people who rely on us for leadership and accountability at all levels.
- We hold ourselves to the highest standards of integrity in peer reviews, scientific evaluations, and recommendations.
- We represent ourselves accurately and factually to our peers, sponsors, and the general public.
- We are open and honest in all our dealings with the government, external agencies, taxpayers, and donors.
- We honor our obligations to donors and sponsors.

9. Provide and Maintain a Safe Environment for Working and Learning

- We create, provide, and maintain a safe environment for ourselves and for others.
- We foster the physical, mental, and emotional well-being of our community.

10. Obey the Law and Comply with Institutional Policies

- We are scrupulous in all business dealings.
- We are truthful, forthright and accurate when preparing all books, records, documents, reports, and publications.
- We adhere to local, state, and federal laws and regulations.
- We deal honestly with government in all matters.

11. Represent Caltech

- We represent Caltech whether we are based on campus, at JPL, our observatories, or anywhere else in the world.
- We are ambassadors and advocates, embodying the high standards that we set for ourselves and to which we are held by others.
- We are committed to the Institute and its mission recognizing that our actions as individuals reflect on Caltech.

Please note that some topics with ethical implications, such as sexual harassment and discrimination, are not covered in this handbook. Interpersonal issues such as these should normally be referred to Human Resources. Please refer to JPL's Ethics and Business Conduct Requirement for more details.

“Relativity applies to physics, not ethics.”

ALBERT EINSTEIN



Why Ethics Is Important

Ethics is important on several levels.

On a personal level, most people feel better working for an ethical organization. If the organization truly values fairness, honesty, and integrity, employees are more likely to enjoy their work and take pride in the organization.

At the professional level, ethically oriented codes of conduct are common. Professions recognize that their credibility rests not only on technical competence, but also on public trust.

At the organizational level, ethics is good business. Several industry studies have shown that over the long run ethical businesses do better than unethical businesses.

At the societal level, the public often has higher expectations from organizations that receive public funding. JPL exists to perform an important, long-term mission in the public interest. It is important that JPL not only perform this mission to the highest standards of integrity but that we are perceived by society as doing so.

We may not think about it every day, but we all depend on the ethical behavior of our co-workers, whether they are peers, subordinates, supervisors, or higher levels of management. Ethical behavior, simply put, is being open, honest, and trustworthy and treating one another with respect. The daily decisions we all make at JPL affect our future and the future of the Laboratory. We are all parts of an interdependent system — a system in which each part has the potential to affect all other parts either positively or negatively.

Our Responsibilities

JPL's Ethics and Business Conduct Requirement documents the Laboratory's commitment to conduct business lawfully and to high ethical standards. Our individual responsibilities are summarized below:

- Knowing, understanding, and complying with JPL ethics requirements
- Attending ethics briefings annually
- Contributing to the workplace environment by upholding JPL's ethical standards and requirements
- Seeking help when the proper course of action is unclear or unknown
- Counseling fellow employees when they are in danger of violating JPL's ethical requirements
- Reporting material violations of ethics requirements to your supervisor or the Ethics Office

Supervisors and managers have a special responsibility for:

- Leading by example
- Implementing ethics requirements and raising ethical awareness
- Ensuring that all employees they supervise understand JPL's ethics requirements
- Ensuring that ethical misconduct is reported to the Ethics Office
- Requiring the employees they supervise to attend ethics briefings annually
- Maintaining a workplace environment that is open, where employees can discuss concerns without fear of reprisal

your acknowledgement

Employee Acknowledgement

Each of us is responsible for knowing, understanding, and complying with JPL ethics requirements. Upon your employment you received and signed the Ethical Business Conduct Acknowledgement, demonstrating your understanding of the requirement to comply with JPL's ethics and business conduct requirements. Although as a new employee you were provided a copy of the Ethics Handbook, always refer to JPL Rules! for the latest and complete version.

Where to Go for Help

Although we share a common set of values and accepted standards, it is not always clear what to do. When you have an ethics-related question or concern, you are encouraged to discuss it with your supervisor. If you are uncomfortable with this option, feel free to contact the Ethics Office. The important thing is to ask questions and seek guidance when in doubt.

At times we may feel uncomfortable raising questions or reporting potential problems when there is not an easy solution. But reporting concerns is critical. If we don't address concerns promptly, damage to our relationships, business, operations, and reputation may result.

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The JPL Ethics Office

Contacting the Ethics Office can be anonymous, confidential, or open, as you desire. The Ethics Office phone number is (818) 354-6338 or if you prefer to remain anonymous you may call the Help Line at 818-354-9999 or toll-free at 1-866-405-7536. All have 24-hour answering machine service. You may also discuss the issue in person with any member of the Ethics Office staff. There is additional information available at the JPL Ethics Web site, <http://ethics.jpl.nasa.gov>. Contact the Ethics Office no matter the nature of the concern or how simple the question may seem to you. The Ethics Office will make every effort to help you resolve your concerns.

Allegations of wrongdoing are reviewed and investigated by the Ethics Office and/or other Laboratory or Caltech Campus organizations — such as Protective Services, Human Resources, or Caltech Audit Services and Institutional Compliance — depending on the nature of an allegation. The investigation process has been designed to be thorough and, at the same time, fair to all involved parties.

Confidentiality


To the extent possible, communications with the Ethics Office will remain confidential. However, in some situations, the Ethics Office is obligated to follow up to

ensure that any ethical issue has been appropriately addressed. This follow-up might include sharing information with other persons holding positions of responsibility at the Laboratory. In addition, there may be some situations in which the Ethics Office is obligated to reveal the identity of individuals involved with a allegation of wrongdoing. In those instances, care is taken to protect the individuals with the greatest degree of confidentiality possible. When an anonymous

concern or allegation is reported to the Ethics Office, the issue will be pursued or investigated. Individuals reporting concerns or allegations anonymously should attempt to provide sufficient detailed information to facilitate a thorough investigation. Although not required, it is very helpful if the individual provides some mechanism to be reached such as an anonymous email address or code word, if additional information or feedback is needed.

Employees who are concerned about revealing their identity should contact the Ethics Office anonymously by calling the Help Line at (818) 354-9999 or toll-free at 1-866-405-7536.

Laboratory policy prohibits retaliation against employees who, in good faith, report violations or suspected violations of ethical practices. False accusations against another employee for retaliatory or personal reasons will not be tolerated.



“No one
should be
judge in his
own cause.”

SYRUS



Conflicts of Interest

The concept of “conflict of interest” applies to most ethical standards addressed in this handbook. For our purposes, a conflict of interest is a situation in which our private or personal interests conflict with our official responsibilities as JPL employees. Even the perception of a conflict must be avoided.

As JPL employees, there are three guiding principles that will help us avoid conflicts of interest:

- Do not use your JPL position for improper personal gain for yourself or any person with whom you have personal, business, or financial ties.
- Avoid any outside activity that could give the appearance of adversely affecting the objectivity of your judgment or interfere with the timely and effective performance of your job.
- Do not participate in any procurement action, whether for JPL or a Federal agency, that involves a company in which you or your family has significant financial interests or other business or personal connections.

JPL expects employees at all levels to be free of influence, interest, or relationships that might conflict with the best interests of JPL. If you think there is even a slight chance you might have a conflict of interest, you must contact your supervisor and/or the Ethics Office to decide whether you really do or not.

Employment of Relatives and Personal Relationships

In most cases the employment of relatives at JPL does not present a problem. But in some cases such employment can create a conflict of interest situation known as nepotism or favoritism. The employment or assignment of relatives and persons with whom employees have personal relationships, whether as employees, affiliates, contractors, or consultants, is prohibited when:

- An employee has decision-making authority or influence that could affect a relative or a person with whom the employee has a personal relationship (e.g., an employee evaluates work performance or participates in the salary or bonus recommendation of a relative or person with whom the employee has a personal relationship).
- A relative or an individual with whom the employee has a personal relationship is in an employee's chain of command (e.g., the daughter of a Division Manager is assigned to a group in the manager's division).

Procurement Conflicts of Interest

Procurement-related conflicts of interest fall into two categories:

1. Those that arise when a JPL employee works on a JPL procurement.
2. Those that arise when a JPL employee assists a Federal agency with one of the agency's procurements.

The main point to keep in mind is that we may not participate in any procurement action, whether for JPL or a Federal agency, that involves a company in which our families or we have significant financial interests or other business

For JPL procurements, these prohibitions are matters of Laboratory policy. For Federal agency procurements, they are matters of law, the violation of which may result in serious civil and criminal penalties.

or personal connections. In addition, we may not:

- Discuss future employment with a competing contractor,
- Seek or accept any gratuity from a competing contractor, or
- Attempt to acquire or disclose proprietary or source selection information regarding the procurement.

Organizational Conflicts of Interest

In addition to the conflicts of interest described above, there are situations where JPL as an institution may have a conflict of interest. For example, when NASA asks JPL to evaluate proposals NASA has received from other entities, an "organizational conflict of interest" arises if some of those proposals were submitted by JPL. In such cases, JPL's prime contract with NASA spells out procedures that must be followed to avoid or mitigate these conflicts. Contact the Contract Management Section for guidance on avoiding organizational conflicts of interest, or for a more detailed explanation of the Organizational Conflict of Interest Requirement.

Former JPL Employees

We may be required to limit our Laboratory business dealings with former JPL employees for one year after the former employee has left JPL. During this one-year period, Laboratory business dealings with a former employee who owns or represents an organization are generally prohibited.

JPL employees should be particularly careful not to give preferential treatment, including proprietary information, to former employees regardless of how long ago they left JPL or Campus.

Former Government Employees

Certain Federal laws, commonly known as “revolving door” statutes, place restrictions on former Government employees in performing work (as employees, consultants, or contractors) for Government contractors like JPL. These laws also place restrictions on employment discussions with current Government employees. Supervisors and managers must ensure that hiring decisions and duty assignments involving former Government employees do not conflict with these statutes. It is also important to be aware of the restrictions on employment discussions imposed on former Government employees before contacting them to discuss employment opportunities at JPL.

JPL employees who are former Government employees, including employees of contractors who are under direct JPL supervision, have a personal obligation to stay informed of Federal laws and regulations that affect their duties and employment relationships. Former Government employees should direct questions about their status to their former agency’s designated ethics official. Contact Human Resources and the Ethics Office before initiating employment discussions or when in doubt about duty assignments.

Government Assignees/Detailees

Individuals from the private sector who accept temporary assignments with Federal agencies are subject to certain employment restrictions once they leave Federal service and return to their primary employer that are similar to those imposed on former Government employees. The restrictions apply to JPL employees returning from Federal agency assignments whether they were detailees or Inter-governmental Personnel Act (IPA) assignees.


JPL employees who are contemplating assignments to NASA or other Federal agencies, or who are returning to JPL from such assignments, must contact the Ethics Office for a briefing on how the law applies to their situations.

Conflicts of interest may also arise in conjunction with financial interests JPL assignees have in outside organizations. Assignees who participate personally and substantially in a particular matter in which they, a close relative, partner, or organization with which they are affiliated, or have a financial interest in, may be subject to civil and criminal penalties under Federal law.

call when in doubt

When a conflict of interest situation arises, JPL assignees can best serve their own interests, as well as the interests of the Government and JPL, by recusing themselves from the decision-making process.

Refer to the Conflict of Interest Requirement and contact the Contract Management Section for guidance.



**“It takes many good
deeds to build a
good reputation
and only one bad
one to lose it.”**

BENJAMIN FRANKLIN



Use of JPL and Sponsor Resources

Each of us has an obligation to productively use the time paid for by JPL. Work hours should be devoted to activities directly related to JPL business or to activities properly authorized by JPL. Resources used at JPL, including materials, equipment, facilities, and services, are provided for the accomplishment of JPL-related tasks. Employees are expected to protect and preserve JPL and sponsor resources, which include such things as materials, supplies, equipment, information, and phone and computing resources. Resources may not be modified, sold, loaned, or given away, regardless of condition or value, without proper authorization. The unauthorized removal of materials, equipment, or supplies from JPL facilities or facilities under JPL control may be regarded as theft. Personal use of JPL services such as the JPL Mail Services, Shipping and Receiving, and Duplicating Services is prohibited. For example, we cannot have personal packages sent to Shipping and Receiving, nor can we have our personal mail processed by Mail Services.

Limited personal use of some resources such as phones, computers, fax machines, copy machines and the JPL Library, is permitted on an “occasional and reasonable” basis (see below). Use of JPL property for solicitation, personal gain, or to advocate your views on political, religious, or social issues is strictly forbidden.

For information on whether any other activity involving the use of JPL time or resources is permitted, see your supervisor or contact the Ethics Office.

Use of Electronic Communications Resources

JPL provides electronic communication services, including phones, fax machines, email, and the Internet, for the conduct of JPL business, the performance of work-related duties, professional training, and education. Limited personal use of these resources is authorized as long as such use:

- Is occasional and of reasonable duration.
- Does not adversely affect performance.
- Is not prohibited by the employee's management or JPL policy.
- Does not violate state or Federal laws, compromise intellectual property rights, or result in embarrassment to JPL, Caltech, or the sponsor.

The following activities involving email and the Internet are expressly prohibited:

- Spamming, hacking, or forwarding chain letters
- Viewing or downloading sexually explicit material
- Communications that are discriminatory, harassing, defamatory, threatening, or embarrassing to JPL
- Posting to a Web site that is not related to your job or field that can be viewed by the general public

Refer to the Use of JPL and Sponsor Resources Requirement for more details.

There is no substitute for common courtesy and good judgment in communicating electronically. Remember that your communications can be traced back to JPL, so they are not much different from using JPL letterhead stationery.

Gifts and Gratuities

The offering and receipt of a gift or gratuity must never affect the independence of our judgment or those with whom we conduct business.

Offering or Giving Gratuities

It is JPL policy to conduct business dealings with impartiality. Transactions and relations with suppliers and customers must be conducted with integrity, fairness, and openness. We may never offer directly or indirectly a business courtesy, under any circumstance, that might create the appearance of impropriety or cause embarrassment to JPL or the recipient. Further, we should not use personal funds or resources to do something that would not be permitted to be done with JPL resources.

Offering or Giving Gratuities to Government Employees

We are also prohibited from offering or giving gratuities to any employee of the U.S. Government with the intention of obtaining favorable treatment under a Government contract. In addition, Laboratory policy precludes us from offering or giving a gratuity to any Government employee where the offer or gift violates any known policy of the employee's agency. Keep in mind that something as simple as providing transportation to a visiting government employee may violate the rules. Because there are different exceptions for local and state government entities and varying rules and protocols applicable to international entities, we should always contact the Ethics Office or refer to the Offering or Giving Gratuities Requirement in JPL Rules! for more details.

Soliciting or Accepting Gifts or Gratuities

As JPL employees we must not solicit or accept, from any interested party, any gratuity or other thing of value for ourselves, our families, friends, or associates. Be particularly careful about accepting gratuities when we are involved in any phase of a procurement. Employees sometimes think this rule applies only to buyers and negotiators, but many technical employees, P-Card holders, and P-Card approving officials at JPL frequently become involved in various aspects of the procurement process and must avoid improper conduct.

USE COMMON SENSE

There are a few exceptions to the general rule against accepting gratuities. Most of them involve common sense considerations (e.g., advertising or promotional items with a retail value of \$20.00 or less, coffee and donuts at a contractor's site, or local transportation when visiting a contractor's site).

Gifts in the Workplace

The solicitation of gifts or favors from subordinates is prohibited. Furthermore, management is encouraged to establish practices in the workplace that discourage unsolicited gifts to managers. On occasions when gifts are traditionally given or exchanged among all employees in the work group, such as birthdays and holidays, both supervisory and nonsupervisory employees may participate. In general, gift exchanges should be inclusive and not exceed the \$20 limit placed on gifts from suppliers. Employees should not be made to feel that they are required to participate in gift giving or exchanges.

Anti-Kickback Act of 1986


The Anti-Kickback Act affects all of us at the Laboratory. Among other things, subcontractors are prohibited from offering JPL employees anything of value to obtain a subcontract or favorable treatment under a subcontract. The law prohibits every employee from soliciting, accepting, or attempting to accept a kickback. Violations of the Act can result in severe civil and criminal penalties, and disciplinary action by JPL up to and including discharge for cause. Any known or reasonably suspected violations of the Anti-Kickback Act must be reported to the Ethics Office at once for review and investigation.

Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act and other U.S. laws prohibit the payment of money or anything else of value to a foreign official, a foreign political party, an official of a foreign political party, or any candidate for any foreign political office, for the purposes of obtaining, retaining, or directing business. We must strictly abide by these laws. Any violation or solicitations to violate must be reported immediately.

When we are conducting business in another country, we may encounter laws and local customs that differ widely from those in the United States. Both the laws of the country where you are and the laws of the United States must be obeyed. In addition, where local law or common business practices may be less restrictive than those found in this handbook, the standards contained in this handbook will apply.

Seek advice in advance from the Office of Legislative Affairs in any situation in which facilitating payments (payments for expediting that simply facilitate the proper performance of duties) may be involved.



**“A gift consists
not in what is
done or given,
but in the
intention
of the giver
or doer.”**

LUCIUS SENECA

**Please refer to JPL Rules!
on Speaking Engagements,
Appearances, and Honorariums
and Release of Information
requirements or consult
Document Review Services prior
to accepting invitations for
guidance on when clearance
may be required.**



Special Invitations and Honorariums

We are encouraged to accept invitations to speak, write articles, or review proposals on subjects relevant to JPL or its programs when such engagements are in the best interests of JPL and Caltech.

An honorarium is a payment for services on which custom or propriety forbids a price to be set. The term honorarium includes a payment of money or anything of value (excluding any costs incurred that are paid or reimbursed by any other person) for an appearance, speech, or article.

Any time spent in support of the engagement (including travel time), that occurs during the employee's scheduled work hours shall be treated in one of two ways:

1. If the engagement is for a non-NASA entity, the employee may use vacation or take leave without pay. In this case, the employee is not considered to be on JPL travel status for insurance or any other purposes during the leave time. The employee is allowed to retain any honorarium payment and travel expense reimbursement received for supporting the engagement.
2. If the engagement is for NASA or otherwise adds value to, or is in support of, the employee's current work assignment, the employee, with management approval, may support the engagement during the employee's scheduled work hours. If travel is required, the employee is considered to be on JPL travel status and all allowable expenses shall be reimbursed. Any honorarium received must be credited to the JPL account charged by the employee.

Honorariums or royalties from a technical book or manuscript accrue to Caltech if they result from Laboratory-assigned tasks. In the case of a private venture where a book is written without the use of JPL resources (e.g., time, equipment, and/or facilities), Caltech normally does not claim honorariums or royalties. However, if JPL/Caltech data, photographs, drawings, logos, etc., are used, prior approval is required and appropriate credit must be given.

Outside Employment, Consulting, and Other Activities

You are encouraged to participate in professional organizations and community activities, but participation must not jeopardize JPL's reputation or conflict with JPL's interests. Keep in mind that we are expected to arrange outside obligations, financial interests, and other professional activities in such a way that they do not interfere or conflict with our Laboratory responsibility. Types of permissible outside activities, include, but are not limited to, consulting, and part-time employment with schools or companies. These outside activities must not create an actual, perceived, or potential conflict of interest, or use any JPL resources, and must not adversely affect our ability to perform our jobs. In most cases employees must submit a Request for Outside Activities through their line management to the JPL Ethics Office for review prior to engaging in the outside activity. The absence of compensation, either in monies or other considerations, does not remove the requirement that an application be completed. The primary purpose of the application process is to help you and your management identify any potential problems and develop a proactive approach to preclude any real conflicts later.

Community Activities

As a private citizen, you are encouraged to participate actively in civic public affairs activities. Such activities contribute to the improvement of our communities. If you seek public office or serve on commissions or advisory groups, please be alert to potential conflict of interest situations and be prepared to recuse yourself from participating in deliberations or voting on any issues that directly involve Caltech Campus or JPL. You should make every effort to perform those activities during non-work hours.

Professional Societies and Associations

JPL encourages membership and participation by its employees in recognized technical, governmental, and professional societies and associations. Concurrence by your management is not required to serve as an officer or committee member, but is required if you desire Laboratory support for the activity. JPL may provide reasonable financial support for individuals appointed to offices or national-level working panels for limited periods of time when approved by appropriate management. When performing work for an organization, remember that you are acting as an agent of that organization — not as an agent of JPL.

Commercial and Political Endorsements


The Laboratory's image and its success in achieving its objectives are dependent on the impartiality JPL shows in its dealings with business and the general public. Therefore, if you engage in any promotional activity that might be interpreted as endorsing, benefiting, or favoring a commercial organization, private venture, product, or political group or cause, you must do so on your own time as a private citizen, not as a representative of the Laboratory. Even the appearance of participating as an official representative of JPL must be avoided. Laboratory resources, including property and facilities, may not be used for such activities.



... if you engage in any promotional activity that might be interpreted as endorsing, benefiting, or favoring a commercial organization, private venture, product, or political group or cause, you must do so on your own time as a private citizen, not as a representative of the Laboratory.

As private citizens, we are free to petition or otherwise contact the Government on any issue we desire. Federal law and regulation restrict lobbying activities by the Laboratory, therefore, we may not purport to represent JPL or Caltech Campus when contacting any branch of Government at any level, unless authorized by the Office of Legislative Affairs.

Refer to the Commercial and Political Endorsements Requirement for more details.



"If I have seen
further than
others, it is by
standing upon
the shoulders
of giants."

ISAAC NEWTON



Ethics in Research

At JPL we encourage new ideas, collaboration, and participation at all levels of the organization and work as a team. Success is to be shared. Every employee is encouraged to contribute, suggest improvements, and refine our practices to enhance innovation and to ensure that we meet our commitments. Where internal JPL reports are based on major contributions of others besides the authors, every effort must be made to appropriately acknowledge those contributions in the reports.

Peer review or scientific review of proposed research, replication of experiments, and publication of results provide the basis for scientific advances, quality control, and public confidence in scientific research. As a major producer and user of research, JPL has a vital interest in the integrity of the research record. It is the responsibility of all JPL employees to conduct and report research in such a way as to uphold the longstanding tradition of research excellence enjoyed by the Laboratory and Caltech and to avoid damage to the general enterprise of academic research.

Research misconduct is defined as fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results. It does not include honest error or honest differences of opinion. Refer to the Ethics in Research Requirement for more details.

In cases where research misconduct is alleged, the JPL Chief Scientist oversees the conduct of inquiries and inves-

“Action indeed
is the sole
medium of
expression
for ethics.”

JANE ADDAMS

tigations with support from the Ethics Office and other JPL and Caltech organizations as appropriate.

The pursuit of excellence and innovation must never compromise professional and ethical standards or JPL’s reputation.

Integrity of Information

The generation, dissemination, and safeguarding of information is key to JPL’s success. Every JPL employee is responsible for the integrity and accuracy of business documents, communications, financial records, and reports, including timekeeping.

Financial Integrity

It is of vital importance for our customers to be able to rely on, and have full confidence in, financial data provided by JPL. Valid financial data is necessary for management planning and control purposes and is important in meeting our obligations to suppliers, sponsors, and the public. Therefore, JPL requires each employee to record financial transactions — including transactions related to labor charging, labor allocation, and timekeeping — with complete integrity. In other words, each employee is responsible for ensuring that financial transactions are accurate, reliable, timely, and consistent with JPL’s established financial practices. Labor and cost information must be correct, consider all relevant information, and conform to generally accepted accounting principles. JPL internal controls and practices are never to be circumvented.

Protecting Information

JPL encourages the exchange of information as part of its effort to apply the full resources of science and technology to the work it performs. Some information, however, cannot be freely disseminated or used because of its proprietary nature. Examples include source selection or proposal information such as cost or pricing data or technical drawings entrusted to JPL by an outside organization with whom JPL works. Other examples include unreported new technology from JPL work. We must ensure that information and technology received or generated is properly identified, marked, and controlled appropriately.

JPL, Caltech Campus, or Government proprietary information that cannot be released until authorized by the Office of General Counsel includes, but is not limited to, inventions, software, discoveries, improvements, or innovations that were conceived or first reduced to practice in the performance of work by an employee in the line of duty or with the use of JPL or Campus facilities. This could involve a scientific discovery, new or improved product, material, process, machine, apparatus, device, fixture, hand tool, etc.

In performing JPL work, we may be asked by an outside organization to sign an agreement not to disclose that organization's proprietary information. Such agreements should not be signed unless approved in advance by the Office of General Counsel. This office may require that Caltech's nondisclosure agreement be used. Proprietary information is a valuable business asset for outside organizations. Once signed, nondisclosure agreements constitute binding commitments that could result in serious legal consequences and loss of credibility for you and JPL, and the possibility of severe financial damage to the outside organization, if they are violated.

We should not disclose confidential information unless there is a clear business purpose or appropriate authorization. Safeguard information and always seek guidance if you are in doubt before discussing business matters with unauthorized persons, industry partners, or friends and family.

report security violations

JPL employees must follow all security requirements associated with the proper handling of restricted or classified information. Employees must report actual or potential security violations immediately to JPL Protective Services.

Employee Privacy

It is JPL policy to restrict access to JPL records that contain personal information about its employees. This includes personnel records, payroll records, benefit plans, and medical records. Access to these records is limited to those who have a legal or business need to know. Care should be taken by all persons who have access to the personnel, payroll, or medical information of others to keep that information confidential.

Each of us has a responsibility to protect the rights of others to privacy. Monitoring or recording a telephone call or other conversation of another person without permission is a violation of JPL policy and California law. Employees must not intentionally access another person's personal data in a desk, file, or on a computer without authorization. If a speakerphone or similar device is used during a phone call, all parties must be informed if others are able to hear the conversation.

Interacting with Auditors

Being factual and truthful is important in all communications with others. This includes dealing with Government personnel who are investigating individuals for security clearances, as well as NASA Inspector General and FBI investigators, Defense Contract Audit Agency auditors, General Accounting Office and NASA auditors, and quality assurance representatives.

Federal law provides for severe penalties for anyone who tries to influence, obstruct, or impede Federal auditors or investigators in the performance of their official duties.

JPL has assigned audit coordinators to aid Government auditors and to ensure that each audit is conducted according to established guidelines. If an outside auditor arrives unannounced, or without making proper arrangements, you should refer the auditor to the Audit Liaison Office in the Finance and Contract Management Division.

Fraud

All employees, contractors, and other organizations working with and for the Laboratory are expected to conduct their business activities honestly and accurately in the performance of work for the Federal Government. The Laboratory, its employees, contractors, consultants, and associates are subject to a range of Federal statutes dealing with fraud-related activities. These individuals should be aware of their responsibilities and what actions would constitute fraud, as they may be liable, both criminally and civilly, for fraudulent conduct connected with work performed for NASA or other Federal agencies.

**Refer to
the Fraud
and Kickbacks
Requirement
for more
details.**

Improper actions include but are not limited to:

- Making an oral or written false statement or representation
- Falsifying, concealing, or covering up material facts
- Making or presenting a claim knowing it to be false
- Making false entries on timecards, benefit claims, travel vouchers, purchase requisitions, contractor invoices, shipping and receiving documents, petty cash vouchers, or other reports or records that are the basis for requesting payment from the Government
- Charging, allocating, or transferring costs to improper accounts
- Using Government property, services, or funds for personal gain
- Falsifying test data, making false certifications, manipulating test procedures, or inappropriately substituting one product or component for another

Many laws and regulations apply to JPL business operations and you should consult with your management, subject matter experts, or the Ethics Office anytime you have a concern regarding your compliance.

It is difficult in any written document to cover every ethical situation that might arise.

This handbook, therefore, is a guide to the policies and legal requirements most often impacted by the performance of our work.

High standards of business conduct are critical to the maintenance of public confidence and support of our mission.

Each one of us is responsible for our own actions. In all of our dealings with each other, as well as our customers and suppliers, it is essential that we conform to the legal and policy restrictions placed upon us and make our decisions in the framework of fairness, honesty, integrity, loyalty, and respect for others.

If you need clarification on any matters covered by this handbook, read the applicable JPL ethics requirement. If you still have questions, do not hesitate to ask your supervisor or call the Ethics Office at (818) 354-6338.

