Ethics for District Directors and District Employees

September 2026

Q&A Follow-up

The following questions were asked during the live trainings, but needed additional clarification or research before they could be clearly answered.

Note: Training is conducted to provide education and information to better equip everyone to perform their roles. If you believe you may have been in violation of ethics rules in the past, take the approach of remedying those actions going forward.

Q: Can a Conservation District purchase equipment from one of the director's parents (or other family members)?
A: According to the District handbook, a Conservation District must solicit quotes from at least 3 vendors before purchasing something between $2,500 and $10,000. Ethics rules prohibit the use of office in order to financially benefit yourself, a director, or family members.

The best resolution is for the board to find another vendor to purchase the equipment from – a vendor that does not have any business or family relationship with the directors or employees of the district.

However, if the board member with the family relationship to the vendor/seller disqualifies themselves from the matter (removes themselves from participation in ALL elements of the purchasing decision including initial discussions, leaves the room when the matter is being considered, does not discuss the matter at all with other board members), the district may purchase the equipment from the director's family if they have the best and lowest quote for the equipment.

Q: When a Conservation District employee is asked by a 501(c)(3), such as OACD, to attend a meeting during business hours that is being held by a political party, should you register as a lobbyist?
A: If OACD or any other 501(c)(3) asks you to attend a meeting during business hours, when you are working for your Conservation District and representing the Conservation District, for any kind of political candidate campaign, then you should NOT attend because mixing time while you are working with "campaigning" is a violation of the ethics rules.

If OACD wants you to attend a meeting with a current legislator that is not campaigning, then you can attend without having to register as a lobbyist. You just cannot *ask the legislator to do something for your conservation district* unless you register as a lobbyist. You can tell the legislator all about your conservation district, but you cannot *ask them to do anything* unless you register as a lobbyist.

You can attend the meeting in your personal capacity, if you take time off of work and do not use district resources (such as vehicles or email) to attend the meeting and talk to the legislators.

For additional questions or guidance, please contact:
Clancy Green – clancy.green@conservation.ok.gov – 405.522.2111

Q: **A Conservation District invites a senator-elect to a meeting that is hosted by a registered 501(c)(3), such as OACD, that the Conservation District works with frequently. The 501(c)(3) provides a meal at the meeting. The meeting has a $45 registration fee. Can the Conservation District cover the cost of the senator-elect's registration?**
A: The Conservation District may pay the registration fee if the individual is attending in their professional capacity in another job, rather than in their capacity as a senator-elect.

For example, Joe Smith is a senator-elect, but his regular job is as a science professor at the University of Oklahoma. If the Conservation District invites him to attend an event in his capacity as an OU science professor, the District may pay his registration fee. He may attend and speak or present on topics related to his professional role.

However, the event cannot be used as a platform for his political campaign, and the District cannot pay for his attendance in his capacity as a senator-elect.

Q: A State Agency employee attends an event hosted by a public University, and the public University gives out door prizes for the event. The door prizes are sponsored by a private business. If the State Agency employee wins the door prize at random, is that a violation of the ethics rules?
A: If the door prize is nominal (like a gift basket) that is acceptable. It would be unusual for a door prize to be anything substantial, so it shouldn't be an issue

Q: My district allows me to attend Conservation Day at the Capitol and pays my wages and mileage for the day; I do not take PTO. I thank them for their support and ask them to continue supporting Conservation efforts; I also share information about how their support benefits producers in each district. Is that education or lobbying?
A: Lobbying is (1) when you are on the clock, (2) representing your district, and (3) asking a legislator to do something for the benefit of the District. Therefore, going to Conservation Day at the Capitol, while on work time, and receiving funds for wages and mileage, and ASKING legislators to support conservation districts is lobbying and if you would like to continue to ask legislators for things for the District, you should register as a lobbyist**.** It would be "education" if you did not *ask* legislators for anything, but just told them all about how their support benefits producers in each district. To be clear, it does not matter that your board approves it. You are still in violation of the ethics laws if you are requesting support.

You can attend the day in a personal capacity, if you take time off work, and do not use district resources (such as vehicles or email) to attend and lobby legislators for district support.

Note: Violations of the Oklahoma Ethics Rules are generally addressed through complaints filed with, or referrals made to, the Oklahoma Ethics Commission (OEC). The OEC may review the allegations and determine whether further investigation or enforcement action is warranted. A violation may be referred to the Ethics Commission regardless of whether the activity was approved by the District's board.