Consider following this decision tree

Give strong consideration to following the organization’s guidance. If you choose to deviate, be prepared to justify why you deviated, and document it.

Do you need to take additional steps?
Take action and consider whether the issue is resolved
Was the result satisfactory?

Talk to the organization’s Ethics Resource or in-house legal counsel if they exist
Was the result satisfactory?

Talk to another sr. exec that you trust
Was the result satisfactory?

Talk to the organization’s oversight body
Was the result satisfactory?

Does the organization have an Ethics policy and process in place to give you guidance?

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Notes to Ethics Decision Tree
For CPAs in Government

1. When speaking with your manager or a more senior executive, carefully gauge your satisfaction with the response. Bear in mind that your manager or other executive might be a party to the situation that you have observed, so approach the response with the necessary degree of professional skepticism.

2. It appears you have successfully managed your way through this challenge. It is recommended that you maintain and secure all documentation related to this matter as described in your records retention policy or as recommended by your legal counsel in case the issue resurfaces. Has the organization’s processes, internal control system, and culture changed in response to this matter? Are these changes sufficient to minimize the recurrence of a challenge like this one? Evaluate your answers and consider consulting with management, an outside mentor or other neutral party whom you respect.

3. Consider whether it is appropriate for you to continue your employment in this organization. Consider the severity and implications of the issue you have identified and whether it should be reported to the outside auditors, regulators, legislators, council members, audit committee, or another party.

ETHICS HOTLINE
The AICPA Professional Ethics Team maintains a hotline for members to make inquiries about the Code of Conduct, and for advice when facing situations that challenge their professional ethics. To access the Ethics Hotline dial 1-888-777-7077 and follow the prompts to be routed to the Ethics team.