



**State of New Jersey**  
STATE ETHICS COMMISSION

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**TO:** Renee C. Burawski, Assistant Commissioner  
Division of Mental Health and Addiction Services, Department of Human Services

**THROUGH:** Christina C. Fullam, Executive Director  
State Ethics Commission

**FROM:** Rachel L. Eger, Ethics Compliance Officer  
State Ethics Commission

**DATE:** December 6, 2024

**SUBJECT:** Ethics Compliance Review – Division of Mental Health and Addiction Services

The State Ethics Commission (“SEC”) has completed its review of the ethics program at the New Jersey Division of Mental Health and Addiction Services (“DMHAS”), Department of Human Services (“DHS”). The ethics review was undertaken pursuant to *N.J.S.A. 52:13D-21(e)(3)* and as part of the SEC’s Compliance Plan, which requires systematic reviews of State agencies in the Executive Branch for compliance with applicable ethical standards. On June 26, 2024, SEC Ethics Compliance Officer Rachel Eger met with DMHAS Ethics Liaison Officer Lisa Ciaston (“ELO Ciaston”) to discuss the particulars of DMHAS’s ethics program. Prior to this meeting, SEC staff reviewed DMHAS’s completed Compliance Questionnaire and exemplars.

Based upon this meeting and a review of the Compliance Questionnaire and accompanying documents, the SEC concludes that DMHAS is in substantial compliance with reporting, documentation, and other requirements of the New Jersey Conflicts of Interest Law, regulations issued thereunder, and applicable Executive Orders.

During the review process, two opportunities for improvement were identified. Both have since been addressed as described below:

1. Special State Officer Requirements – In addition to having jurisdiction over Executive Branch State government employees, the SEC also oversees ethics requirements for special State officers (“SSOs”), including unpaid members of State boards. Like State employees, SSOs are subject to the Conflicts of Interest Law and Uniform Ethics Code (“UEC”) and must fulfill various obligations to ensure adherence to the State’s ethics laws.

The Behavioral Health Planning Council is an approximately 32-member board that falls within DMHAS’s purview. The review showed that Council members, who qualify as

SSOs, have not consistently received copies of the UEC and Plain Language Guide, completed ethics trainings, or submitted Outside Employment Questionnaires as required by the SEC.

According to ELO Ciaston, Council members were advised of their ethics-related requirements in September 2024, and the SEC's Ethics Training Officer provided live virtual training to the Council in October 2024. ELO Ciaston and her team continue to work with Council members on the completion of outstanding forms and trainings.

2. Post-Employment Restriction Letters – Pursuant to *N.J.S.A.* 52:13D-17 and -17.2, and Section VIII of the UEC, State officials are permanently barred from working on matters for subsequent employers on which they were substantially and directly involved on behalf of their State employer. Certain high-level State officials have additional limited duration restrictions when they leave State service. The SEC requires that State agencies provide a notification to all departing employees and officers to advise them of the applicable post-employment rules.

The review showed that DHS Human Resources was providing all departing DMHAS officials with a binder, which included 17 pages of SEC guidance on seeking future employment and post-employment restrictions. This guidance did not include recently enacted restrictions related to the cannabis industry.

ELO Ciaston advised that, effective September 2024, DHS Human Resources is disseminating and collecting signed post-employment letters from all DMHAS officials separating from State service. A review of the letter confirmed that it comprehensively addresses all restrictions to which departing employees are subject.

The compliance review also revealed that DMHAS has successfully implemented many ethics requirements. In particular, the following areas have been handled extremely well:

- ELO Ciaston is among the State's most experienced ELOs, with approximately 17 years of service in the role. She advises DMHAS employees on a variety of issues and contacts SEC staff for guidance when necessary.
- ELO Ciaston and her team regularly coordinate with the DHS Central Office to ensure that ethics requirements are met by DMHAS employees.
- ELO Ciaston provides employees with detailed guidance on outside activities, clearly outlining any conditions of approval.

On behalf of the New Jersey State Ethics Commission, we would like to thank you for your assistance and cooperation with this review process. Under the guidance of ELO Ciaston, DMHAS's ethics program is in substantial compliance with the State's ethics requirements and thereby works to ensure the integrity of its operations.

Please feel free to contact the SEC if you have any questions or concerns regarding the findings in this report or if we can be of any assistance to DMHAS.

cc: Lisa Ciaston, Ethics Liaison Officer, DMHAS (*via email only*)  
Jessica Calella, Legal Specialist, SEC (*via email only*)