

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, February 28, 2018 8:59 AM
To: Sanchez, Rodzandra (COE)
Subject: Fabian Escobar, Security Systems Engineer, ITD (gifts) INQ 18-55

INQ 18-55 Escobar

From: Turay, Radia (COE)
Sent: Monday, February 26, 2018 4:04 PM
To: Escobar, Fabian (ITD) <Fabian.Escobar@miamidade.gov>
Cc: Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>
Subject: INQ 18-55, Fabian Escobar, Security Systems Engineer, ITD (gifts)

Dear Mr. Escobar,

You requested an opinion regarding whether you can accept a scholarship provided by Cisco, a County vendor.

Background

- You are a Security Systems Engineer in the Miami-Dade County Information Technology Department.
- You applied for and was admitted to the Cisco Global Cybersecurity Scholarship Program (“Scholarship Program”).
- The Scholarship Program was introduced by Cisco to address the shortage of IT professionals with cyber security skills. Cisco will invest \$10 million in the program to increase the pool of talent with critical cybersecurity proficiency.
- Through the Scholarship Program, Cisco will offer free training, mentoring, and testing designed to help participants earn a CCNA Cyber Ops certification and hone the skills needed for the job role of security operations center analyst. The new CCNA Cyber Ops certification has been designed to address the critical skills deficit, providing the job-ready knowledge needed to meet current and future challenges in network security.
- The Scholarship Program is a self-paced e-learning path that includes three courses and two exams.
- The scholarship includes the cost of all the training, mentoring and coaching, and exam fees that participants will receive in the program. Participants are not given any of the scholarship funds directly. The funds are provided to Cisco Authorized Learning Partners who will provide the mentoring and coaching.
- You anticipate that you will not accrue any travel related expenses related to this program as it is an e-learning program, and the program will not reimburse you directly for any travel related expenses that you may incur.
- Any individual over the age of 18, who is proficient in English, and has the basic technical competency required by the program can apply to the program.
- You have advised that you do not oversee, supervise, or administer the County’s contract with Cisco.

Analysis

The Ethics Commission has previously opined that the Ethics Code **does not prohibit** County employees from applying to and receiving a scholarship administered by a County vendor as long as the County employee does not improperly use his or her County employment to gain advantage over other applicants in the process. See, RQO 99-60, INQ 14-129, INQ 10-31, and INQ 10-191.

The Ethics Code at Sec. 2-11.1(e)(3) prohibits County employees from accepting gifts intended to influence them to take an official action or in response to an official action taken. In this case, however, since the scholarship is not

given to you based on a direct personal service provided or to be provided by you, we find that the scholarship administered solely by Cisco Authorized Learning Partners under the circumstances you described do not violate the Ethics Code.

However, the scholarship is a gift as defined in the Ethics Code at Sec. 2-11.1(e)(1) and does not fall within the gift exception of an award for professional or civic achievement. See, INQ 10-191, 10-44, and INQ 10-31. Consequently, you must disclose the scholarship if valued at more than \$100. The gift disclosure form can be found at http://ethics.miamidade.gov/library/forms/gift_form.pdf.

This opinion is based on the facts presented to us. If any of these facts change, or if you have any further questions, please do not hesitate to contact us.

Sincerely,

RADIA TURAY

Staff Attorney
Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 350-0601
Fax: (305) 579-0273
[Ethics.miamidade.gov](http://ethics.miamidade.gov)

From: Escobar, Fabian (ITD)
Sent: Thursday, February 22, 2018 4:22 PM
To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Cc: Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>
Subject: RE: Cisco Global Cyber Ops Scholarship Program

Thank you for your assistance Ms. Turay. I've answered the questions below; additionally, I've included a FAQ document which addresses scholarship requirements and costs.

Regards,

Fabian Escobar
Security Systems Engineer
Miami-Dade County | Information Technology Department (ITD)
Enterprise Security Office
5680 SW 87 Ave | Miami, Florida, 33173
www.miamidade.gov
Phone: 305.596.8418

From: Turay, Radia (COE)
Sent: Thursday, February 22, 2018 4:15 PM
To: Escobar, Fabian (ITD) <Fabian.Escobar@miamidade.gov>
Cc: Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>
Subject: RE: Cisco Global Cyber Ops Scholarship Program

Hello Mr. Escobar,

It was a pleasure speaking with you a few minutes ago. In order to further assist you, please provide answers to the following questions:

- 1) Please provide the monetary value of the scholarship. **No actual value provided, only that it's "equivalent to several thousand US dollars."**
- 2) Would the scholarship include payment for any travel related expenses? **No**
- 3) Does the scholarship include any compensation, allowance, or stipend directly to you? **No**
- 4) Do you have any involvement (enforcement administration, or oversight) over the County's contract with Cisco? **No**
- 5) Is the scholarship being awarded to you based on any task you provided or will provide in your official County position? **No**

Thanks,
Radia.

From: Murawski, Michael P. (COE)
Sent: Thursday, February 22, 2018 3:16 PM
To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: FW: Cisco Global Cyber Ops Scholarship Program

Radia:

Can you handle this?

From: Escobar, Fabian (ITD)
Sent: Wednesday, February 21, 2018 5:10 PM
To: Ethics (COE) <ethics@miamidade.gov>
Subject: Cisco Global Cyber Ops Scholarship Program

Good afternoon,

I've applied for, and was admitted into the Cisco Global Cyber Ops Scholarship Program (Please see link below for scholarship details). At the time of application, I didn't realize that this could potentially cause an ethics violation. Today, I received course information which is asking me to answer the following questions:

Please certify that your participation in the Cybersecurity Scholarship Program will not inhibit your objectivity in relation to your connection with Cisco and will not pose a conflict of interest, whether actual, potential or perceived.

Please certify that your participation in the Cybersecurity Scholarship Program is permitted by your company in accordance with your company's internal expectations and policies.

Please advise.

<https://mkto.cisco.com/Security-Scholarship.html>

Regards,

Fabian Escobar
Security Systems Engineer
Miami-Dade County | Information Technology Department (ITD)
Enterprise Security Office
5680 SW 87 Ave | Miami, Florida, 33173

