



Eric Holcomb, Governor  
State of Indiana

**Indiana Family and Social Services Administration**  
402 W. WASHINGTON STREET, P.O. BOX 7083  
INDIANAPOLIS, IN 46207-7083

April 22, 2024

*Via E-Mail Only:*  
Sean Gorman  
State Ethics Director  
Office of the Inspector General  
315 West Washington Street, Room 101  
Indianapolis, Indiana 46202  
Email: Sgorman@ig.in.gov

**FILED**

**APR 23 2024**

INDIANA STATE  
ETHICS COMMISSION

*RE: Conflict of Interest Screen for Matthew "Logan" McCullough*

Dear Mr. Gorman;

Please allow this letter to notify you of the intention of the Indiana Family and Social Services Administration ("FSSA") to discontinue the screening protocol executed on or about September 13, 2022 and filed concurrently with an Ethics Disclosure Statement – Conflicts of Interest – Decisions and Voting filed on or about September 22, 2022 regarding employee Matthew "Logan" McCullough.

Taylor McCullough, Mr. McCullough's wife, terminated her vendor agreement with Vocational Rehabilitation ("VR") April 7, 2024 and will no longer receive referrals or authorizations from VR where Mr. McCullough remains employed and which precipitated the screening protocol.

According to VR, Taylor McCullough's Approval Status has been set to "Inactive" which automatically discontinues her vendor agreement with VR. She has no pending authorizations and no additional authorizations can be issued. See VR's listing for Taylor McCullough below:

Taylor McCullough Taylor McCullough Inactive Sole Proprietors/Individuals Vendor Profile

Certification Status Certified  
Approval Status Inactive



If Taylor McCullough determines in the future that she would like provide VR services, she must update her registration, agree to any new terms as outlined in the VR Vendor Services Manual and be reapproved before receiving authorizations to provide VR services.

If Logan McCullough is still employed by VR at that time, he will seek guidance from his Ethics Officer to determine if a disclosure statement and screening protocol is again required by the Indiana Code of Ethics.

Please attach this letter to the Ethics Disclosure Statement and screening protocol or remove the disclosure from the public disclosure list.

Thank you for your attention to this matter.

Cordially,

A handwritten signature in black ink, appearing to read "Matthew A. Gerber". The signature is stylized with a large, sweeping flourish that loops back under the name.

Matthew A. Gerber  
Deputy General Counsel & Ethics Officer  
Office of General Counsel



Describe the screen established by your ethics officer: (Attach additional pages as needed.)

See attached

Area with horizontal dashed lines for describing the screen established by the ethics officer.

**AFFIRMATION**

Your signature below affirms that your disclosures on this form are true, complete, and correct to the best of your knowledge and belief. In addition to this form, you have attached a copy of your written disclosure to your agency appointing authority and ethics officer.

Signature of state officer, employee or special state appointee

*Matthew S. McCullough*

Date signed (month, day, year)

9-22-2022

Printed full name of state officer, employee or special state appointee

Matthew Logan McCullough

**FOR ETHICS OFFICER USE ONLY**

Your signature below affirms that you have reviewed this disclosure form and that it is true, complete, and correct to the best of your knowledge and belief. You also attest that your agency has implemented the screen described above.

Signature of ethics officer

*Jessica Keyes*

Date signed (month, day, year)

9/22/22

Printed full name of ethics officer

Jessica Keyes

CONFLICT OF INTEREST SCREEN FOR LOGAN MCCULLOUGH

September 13, 2022

I. RECITALS

Logan McCullough is an Intake Vocational Rehabilitation Counselor with the Vocational Rehabilitation Program ("VR") for the Division of Disability and Rehabilitative Services ("DDRS"); and

Taylor McCullough, Logan McCullough's Wife is a certified one-on-one Braille trainer certified through the National Certification in Unified English Braille ("NCUEB") process; and

Taylor McCullough is the only known NCUEB certified individual in the state of Indiana and wishes to contract with VR to provide one-on-one Braille training to VR participants; and

As an intake and general VR counselor, without further screening, Logan McCullough could have potential to refer applicants or participants seeking one-on-one Braille training to Taylor McCullough as the only known certified provider of this service; and

Any direct referral from Logan McCullough to Taylor McCullough of VR applicants or participants for one-on-one Braille training could create a conflict of interest under IC 4-2-6-9 or implicate the ethics code as to Nepotism pursuant to IC 4-2-6-16; and

An appropriate screen as detailed below would resolve potential ethics code concerns; and

Logan McCullough, for his remaining tenure with the Vocational Rehabilitation Program under the Division of Disability and Rehabilitative Services, agrees to in all ways follow, adhere to, and satisfy the terms of the following Conflict of Interest Screen.

II. CONFLICT OF INTEREST SCREEN.

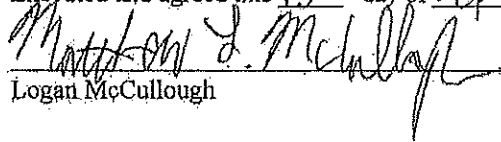
1. Logan McCullough shall not participate in any decision or vote, or any matter related to such decision or vote, in which Taylor McCullough could have a financial interest.
2. Logan McCullough will not have a direct financial interest in any contract between Taylor McCullough and VR and/or DDRS.
3. A two-tier screening process is implemented as follows for intake applicants and participants in Logan McCullough's counseling Area (Area 11 in Muncie) or other area where he may be providing services:
  - a. First, Logan McCullough's supervisor will screen all applicants to be assigned to intake counselors in Area 11 and pull any applicants with a primary diagnosis of Blindness or Visual Impairments and assign those applicants to either another intake counselor or a Specialty Counselor specifically coordinating applicants and participants who are Blind or Visually Impaired; and
  - b. Second, should Logan McCullough learn, at any point in the intake or general counseling process, that someone has a diagnosis of Blindness or Visual Impairment, or otherwise requests information on services related to Blindness or Visual Impairment, Logan McCullough will advise the applicant or participant that he will refer them to a Specialty Counselor who coordinates on matters related to Blindness and Visual Impairment, and Logan McCullough will not continue to counsel these applicants or participants nor make any referrals or suggestions relating to Braille training.
4. That once an applicant or participant is reassigned through the two-tiered process noted in paragraph three (3), Logan McCullough will be screened from involvement in the counseling or service referral process related to those individuals. The Specialty Counselor or other VR counselor will not include Logan McCullough in conversations related to those applicants or participants, and he will be screened from additional information related to services or referrals.
5. Logan McCullough will not oversee the pick list for Braille training providers and will not supervise or address any quality and outcomes issues related to Taylor McCullough, nor will he be involved in the negotiation, administration,

or coordination of any vendor contract between Taylor McCullough and VR and/or DDRS. Logan McCullough will not review or approve vendors of Braille training, and that will be coordinated by the Director of Program Improvement for the Bureau of Rehabilitation Services.

### III. EMPLOYEE AFFIRMATION

I have read and understand the terms of the foregoing Conflict of Interest Screen, and will in all ways follow, adhere to, and satisfy the above stated restrictions and parameters during my tenure with VR and DDRS. I have shared and discussed this Conflict of Interest Screen and its requirements with my supervisor.

Executed and agreed this 13<sup>th</sup> day of September 2022, by:

  
\_\_\_\_\_  
Logan McCullough

**From:** [Keyes, Jessica K](#)  
**To:** [Keyes, Jessica K](#)  
**Subject:** FW: Conflicts of Interest Disclosure form and Screen (SEC presented)  
**Date:** Thursday, October 6, 2022 7:08:15 PM

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From: Rusyniak, Daniel E (Dan) <[Daniel.Rusyniak@fssa.IN.gov](mailto:Daniel.Rusyniak@fssa.IN.gov)>  
Sent: Thursday, September 22, 2022 2:46 PM  
To: Marshall, Cathrine (Cate) <[Cathrine.Marshall@fssa.IN.gov](mailto:Cathrine.Marshall@fssa.IN.gov)>  
Subject: RE: Conflicts of Interest Disclosure form and Screen (SEC presented)

I have reviewed.

Dan Rusyniak, MD  
Secretary, Indiana Family and Social Services Administration  
402 W Washington Street, W461  
Indianapolis, IN 46204  
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