



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

March 9, 2005

Garrett W. Brass, Ph.D.
Executive Director and
Designated Agency Ethics Official
Arctic Research Commission
4350 North Fairfax Drive
Suite 510
Arlington, VA 22203

Dear Dr. Brass:

The Office of Government Ethics (OGE) recently completed a review of the Arctic Research Commission's (ARC) ethics program. This review was conducted pursuant to section 402 of the Ethics in Government Act of 1978, as amended. Our objectives were to determine the ethics program's effectiveness and compliance with applicable laws and regulations. We also evaluated ARC's systems and procedures for ensuring that ethics violations do not occur. The review was conducted from December 2004 through January 2005.

HIGHLIGHTS

Based on the results of our review, we conclude that ARC has laid the foundation for an effective ethics program. During a review we typically examine, among other things, ethics program elements such as enforcement, ethics agreements, written advice and counseling, and travel payments under 31 U.S.C. § 1353. However, we found that ARC has had no activity related to these elements so there is no discussion of them in this report. The public financial disclosure system is generally well managed and the ethics training program appears to be effectively administered. Additionally, ARC has now established a confidential system by virtue of the fact that the Alternate Designated Agency Ethics Official (ADAEO) has agreed to file a confidential report in the future.

ADMINISTRATION OF THE ETHICS PROGRAM

ARC was established in 1984 to promote Arctic research, and to establish and communicate a Federal program plan to support Arctic research. ARC has three full-time employees. You serve as the Designated Agency Ethics Official. ARC's ethics program is administered by the Administrative Officer, who serves as the ADAEO for the agency.

ARC has seven voting Commissioners appointed by the President. ARC's Commissioners serve as representatives to the Commission and are not subject to Federal ethics laws and regulations. ARC does not have any advisory committee members and it does not have any special Government employees.

PUBLIC FINANCIAL DISCLOSURE SYSTEM

To evaluate the effectiveness of the public system, we examined the only public report required to be filed in 2004 by an ARC employee. The report was filed, reviewed, and certified in a timely manner. Our examination of the public report revealed no substantive or technical deficiencies.

ARC did not have written procedures established for public financial disclosure pursuant to section 402(d)(1) of the Ethics in Government Act of 1978, as amended. We suggested to the ADAEO that ARC adopt our model procedures, and she agreed to do so.

CONFIDENTIAL FINANCIAL DISCLOSURE SYSTEM

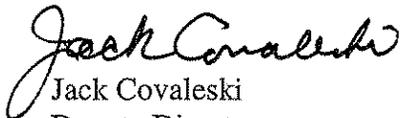
No ARC employee currently files a confidential report. However, based on discussions with the ADAEO regarding her job responsibilities, we determined that she is required by 5 C.F.R. part 2634 to file a confidential report. The ADAEO stated that she will do so from now on.

ETHICS TRAINING

In 2003, one ARC employee was required to complete annual ethics training. According to the ADAEO, the employee received the training from the United States Department of Agriculture's Office of Ethics' on-line training site.

In closing, I wish to thank you and the ADAEO for your complete cooperation and your efforts on behalf of ARC's ethics program. A follow-up review is usually scheduled within six months from the date of this report. However, since this report contains no formal recommendations, this will not be necessary. Please contact Megan Granahan at 202-482-9202, if we may be of further assistance.

Sincerely,



Jack Covaleski
Deputy Director
Office of Agency Programs