

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



April 3, 2017

Melinda Loftin
Designated Agency Ethics Official
U.S. Department of the Interior
1849 C Street, NW
MS 7346
Washington, DC 20240

Dear Ms. Loftin:

As a result of its inspection of the Bureau of Reclamation (BOR) ethics program, the United States Office of Government Ethics (OGE) issued three recommendations in its June 2016 inspection report. OGE recently conducted a follow-up review to determine whether BOR has taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure non-PAS new entrant public financial disclosure reports are filed by the established deadline.	In its June 2016 inspection report, OGE determined that one of the three new entrant public financial disclosure reports required to be filed in 2015 was not filed timely. According to BOR's Deputy Ethics Counselor, there was a delay in collecting the report because the responsible ethics official simply overlooked the date it was due. OGE reviewed the one non-PAS new entrant public financial disclosure report filed in 2016 and found that it was timely filed.	Closed



2	Ensure new entrant confidential financial disclosure reports are filed by the established deadline.	<p>OGE examined 25 new entrant reports during its follow-up review. Of that sample, 32% were filed timely. BOR ethics officials continue to have difficulty with filing timeliness due to trouble coordinating with their human resources office. Human resources is responsible for notifying BOR ethics officials when new entrants enter into confidential filing positions.</p> <p>A new government-wide regulation (5 C.F.R. § 2638.105) requires the lead human resources official to notify the Designated Agency Ethics Official of all appointments to confidential filing positions no more than 15 days after the appointment date. BOR believes this regulation will help improve filing timeliness.</p> <p>OGE will conduct another follow-up to determine if new entrant confidential filing timeliness improves.</p>	Open
3	Ensure annual confidential financial disclosure reports are filed by the established deadline.	<p>In response to OGE's June 2016 inspection report, BOR's Deputy Ethics Counselor held a meeting with the regional Assistant Ethics Counselors to consider ways to improve annual filing timeliness. Subsequently, BOR modified its procedures for collecting confidential reports. Previously, BOR would wait until after the filing deadline to notify supervisors if employees had not filed their reports. BOR now enlists the help of supervisors to collect reports prior to the filing deadline.</p> <p>OGE examined 35 annual confidential reports during its follow-up review and determined that 100% were filed timely.</p>	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance