

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Bureau of Land Management

Follow-up to OGE Report Number: 16-40I

Report No.: 20-21IF

Date: May 12, 2020

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

As a result of its review of the Bureau of Land Management (BLM) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its June 2016 review report. Due to an extensive reorganization of their ethics program, which involved significant structural and personnel changes, BLM twice asked to postpone the follow up review to allow time to implement changes.

OGE has now concluded a follow-up review to assess whether BLM took sufficient action to resolve the deficiencies underlying the five recommendations OGE previously issued. The results of the follow-up review are summarized below.

	<b>Recommendation</b>	<b>Agency Action and OGE Finding</b>	<b>Status</b>
1	Ensure non-PAS new entrant public financial disclosure reports are filed by the established deadline.	OGE examined all 17 non-PAS new entrant reports required to be filed in 2019. Fourteen of seventeen (82%) reports were filed timely.  This represents a substantial improvement versus 2016, when no non-PAS new entrant reports were filed timely.	Closed
2	Ensure non-PAS annual public financial disclosure reports are filed by the established deadline.	OGE examined all 11 non-PAS annual reports required to be filed in 2019. All were filed timely.	Closed
3	Collect the additional information necessary to complete and certify the uncertified public financial disclosure report. If necessary, refer the filer to the Attorney General in accordance with 5 U.S.C. app. § 104(b) and 5 C.F.R. § 2634.701 for willfully failing to file information required to be reported on a public financial disclosure report.	During the course of the 2016 inspection of BLM, OGE discovered a public report that had yet to be certified. BLM collected all necessary information from the filer, and certified the report.	Closed
4	Ensure new entrant confidential financial disclosure reports are filed by the established deadline.	OGE examined all 149 new entrant confidential reports required to be filed in 2019. Fifty-eight (39%) were filed timely.	Open
5	Ensure new employees complete initial ethics training within 90 days. (A regulatory update changed the requirement from “90 days” to “three months.”)	Three hundred and eighty-one BLM employees were required to receive initial ethics training in 2019. Only 255 (67%) received training within 3 months, as required.	Open

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Based on the results of OGE's follow-up review, recommendations 1, 2, and 3 are closed. OGE will conduct an additional follow-up review in approximately six months to assess whether BLM has taken sufficient action to resolve the deficiencies underlying the recommendations that remain open.