



United States Office
Of Government Ethics

Report Number 08-004

Highlights

Model Practices

- DOL implements concrete leadership actions to demonstrate commitment to supporting the ethics program.
- DOL offers education and training that exceed requirements.

OGE Suggests

- DOL standardize the quality of technical review of financial disclosure forms by utilizing DOL's 278 Checklist and 450 Checklist.
- DOL include all relevant reviewer documents in employee financial disclosure report files.

Ethics Program Review Department of Labor

May 2008 Report

Executive Summary

The Office of Government Ethics (OGE) has completed its review of the ethics program at the Department of Labor's (DOL) Employment Standards Administration, Employment and Training Administration, Mine Safety and Health Administration, Occupational Safety and Health Administration, and Office of the Secretary. The purpose of a review is to identify and report on the strengths and weaknesses of a program by evaluating: (1) agency compliance with ethics requirements found in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program. OGE determined that there is reasonable assurance that the performance and management of DOL's program is effective.

OGE's review identified two model practices that DOL has implemented. The model practices include:

- concrete leadership actions that demonstrate commitment to supporting the ethics program, and
- education and training that exceed requirements.

OGE also identified some minor technical deficiencies in the financial disclosure systems. During the review, OGE suggested that DOL:

- standardize the quality of technical review of financial disclosure forms by utilizing DOL's 278 Checklist and 450 Checklist, and
- include all relevant reviewer documentation in employee financial disclosure report files.

This report has been forwarded to DOL's Designated Agency Ethics Official and DOL's Inspector General.



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Introduction

OGE MISSION

The U.S. Office of Government Ethics (OGE) provides leadership for the purpose of promoting an ethical workforce, preventing conflicts of interest, and supporting good governance initiatives.

PURPOSE OF A REVIEW

The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating: (1) agency compliance with ethics requirements found in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures in place for administering the program.

REVIEW AUTHORITY AND SCOPE

OGE has the authority to evaluate the effectiveness of executive agency ethics programs. *See* Title IV of the Ethics in Government Act of 1978, as amended (the Ethics in Government Act), and 5 CFR part 2638. OGE's review of the Department of Labor (DOL) focused on the below program elements.

- Leadership involvement in the ethics program
- Program structure
- Financial disclosure systems
- Ethics education and training
- Ethics counseling
- Enforcement of ethics laws and regulations
- Travel payments from non-Federal sources

OGE's review focused on the ethics programs at five DOL components: the Employment Standards Administration (ESA), Employment and Training Administration (ETA), Mine Safety and Health Administration (MSHA), Occupational Safety and Health Administration (OSHA), and Office of the Secretary (OSEC). The on-site portion of the review was conducted at the DOL Headquarters in Washington, DC, and at the MSHA office in Arlington, Virginia.

Ethics Program Review: DOL

Program Elements

This report consists of descriptions, analyses, and conclusions regarding each program element reviewed.

LEADERSHIP

Commitment and action by agency leadership is the keystone for ensuring the integrity of an agency's ethical culture and for fostering public confidence in the decision-making processes of Government. DOL leadership is committed to supporting the ethics program. The Secretary of Labor prepared a signed letter that was included in DOL's 2006 summary of the ethics rules entitled, "How to Keep Out of Trouble," and delivered a video introduction for annual ethics training. The appointment of the Solicitor—the third ranking official at DOL—as the Designated Agency Ethics Official (DAEO) reinforces the importance of the DAEO position, and allows the ethics program to be highly visible to all DOL leadership and senior staff. The Secretary has the Solicitor speak about ethics issues at DOL semiannual senior staff retreats and other meetings and places an emphasis on ensuring that new non-career employees receive ethics training within two weeks of arriving at the Department. Both the Secretary and the Solicitor encourage their fellow high-ranking non-career officials to go directly to career ethics officials for counseling on ethics matters. OGE considers these actions to be model practices.

PROGRAM STRUCTURE

The Solicitor of DOL serves as the DAEO. The Associate Solicitor for Legal Counsel serves as the Alternate DAEO (ADAEO). The ethics program is administered by the Office of Legal Counsel, which is housed within the Office of the Solicitor (SOL). At the time of OGE's review, SOL consisted of three employees: the ADAEO, the Counsel for Ethics, and a Management and Program Analyst. Since the completion of OGE's review, two employees have joined SOL to work in the ethics program. One is an entry level attorney and one is an Ethics Program Manager who oversees the Department's financial disclosure program. DOL ethics officials believe the added resources will streamline the workload and aid in the efficiency of the office.

While the ADAEO oversees and coordinates the ethics program Department-wide, the bulk of the day-to-day administration of the ethics program is conducted by the Counsel for Ethics with support from the Management and Program Analyst. Both are full-time ethics positions.

DOL's ethics program is decentralized, and for this reason ethics officials emphasize the importance of cooperating with all components Department-wide. Not only do components work closely together whenever possible, but ethics officials are proactive within their respective components and throughout the agency as a whole. Ethics officials are visible to all employees and encourage informal contact with DOL employees in order to foster a comfortable relationship.

Ethics Program Review: DOL

Each DOL component has an ethics contact responsible for duties including: maintaining lists of component-specific financial disclosure filers and providing the lists to SOL, administering the component's confidential financial disclosure system, and providing public filers with the appropriate forms and informing them of due dates.

FINANCIAL DISCLOSURE SYSTEMS

Title I of the Ethics in Government Act requires that agencies ensure confidence in the integrity of the Federal Government by demonstrating that officials are able to carry out their duties without compromising the public trust. High-level Federal officials demonstrate that they are able to carry out their duties without compromising the public trust by disclosing publicly their personal financial interests (SF 278). Title I also authorizes OGE to establish a confidential financial disclosure system for less senior executive branch personnel in certain designated positions to facilitate internal agency conflict of interest review (OGE Form 450).

Financial disclosure serves to prevent conflicts of interest and to identify potential conflicts by providing for a systematic review of the financial interests of both current and prospective officers and employees. The financial disclosure reports also assist agencies in administering their ethics programs in providing counseling to employees. *See* 5 CFR § 2634.104(b).

At the time of OGE's review, DOL's public and confidential financial disclosure systems both were decentralized, with SOL responsible for the general oversight of the financial disclosure systems. SOL distributed form letters and other standardized materials to individual components, and interceded to deal with a problem filer if needed. Individual components were responsible for maintaining and updating filer lists and providing them to SOL, providing forms to filers, and sending out notifications to file.

OGE's review of the public and confidential financial disclosure reports revealed minor inconsistencies among components. Some components did a more thorough technical review of the reports and kept more thorough documentation. OGE informed DOL ethics officials of the inconsistencies and since OGE's review the ethics officials have standardized the performance of all components.

To address the issue of the inconsistencies in the quality of the technical review of public financial disclosure reports, DOL ethics officials centralized the public financial disclosure system. Henceforth, all public financial disclosure reports will be reviewed, certified, and maintained by SOL. This procedural change is designed to produce uniformity in the review and documentation of the public reports. OGE's program review also cited inconsistencies in the review and documentation of the confidential financial disclosure reports. Following OGE's review, SOL decided to implement individual training on the review of the confidential reports for the ethics contact in each component. DOL ethics officials stated that the training initiative will help achieve greater consistency in review and certification practices throughout DOL.

Ethics Program Review: DOL

Detailed written procedures administrate the financial disclosure systems. DOL has both an “SF 278 Reviewer Quick Check” checklist (278 Checklist) and a “DOL Checklist for Review of OGE 450s” (450 Checklist) for use by reviewers.

Component-Specific Public Financial Disclosure Systems

As previously noted, OGE’s review revealed minor inconsistencies among components related to the quality of the technical review of public financial disclosure reports and the maintenance of documentation. During the review, OGE made suggestions to help correct the inconsistencies. The recent centralization of the public system will address OGE’s suggestions.

Office of the Solicitor/Office of the Secretary

SOL and OSEC are separate components of DOL, with SOL directly servicing OSEC for financial disclosure. At the time of OGE’s review, SOL was also responsible for reviewing, certifying, and maintaining the public reports for Presidentially-appointed, Senate-confirmed (PAS), non-career Senior Executive Service (SES) and Schedule C employees of all components. There were 43 non-career staff employees listed on the OSEC master list of public filers from the following DOL components: OSEC, 21st Century Workforce, Faith-Based and Community Initiatives, Office of Public Liaison, Scheduling and Advance, Executive Secretariat, and the Office of the Deputy Secretary. Also included on the master list was the White House Liaison. In addition to the employees on the OSEC master list, SOL was responsible for a total of 26 employees from the components included in OGE’s review because of the employees’ PAS, non-career SES, or Schedule C status: 13 from ESA, 6 from ETA, 3 from MSHA, and 4 from OSHA.

To evaluate the filing, review, and certification of public reports at DOL, OGE examined 61 out of the 69 public reports required to be filed with SOL in 2005. As the review occurred immediately following the 2006 SF 278 annual filing cycle, 8 of the 2005 reports were not readily available for examination because they were being used by ethics officials in the review and certification process for 2006 reports. The 61 reports consisted of:

Type of Report

- 43 incumbent reports
- 18 new entrant reports

61

Ethics Program Review: DOL

Filing Timeliness

- 52 reports were filed timely.
- 3 reports were filed late.
- 6 reports were missing the employee's date of appointment and thus OGE was unable to determine whether they were filed timely.

61

Review/Certification Timeliness

- All 61 reports were reviewed and certified timely.

Quality of Review

Evidence of thorough review, including reviewer notes, e-mails, cautionary memoranda, and completed 278 Checklists was included with all reports.

Employment Standards Administration

Of 33 public reports required to be filed by ESA employees in 2005, 13 fell under the responsibility of SOL and were included in the total for SOL/OSEC. The remaining 20 public reports consisted of:

Type of Report

- 14 annual reports
- 6 new entrant reports

20

Filing Timeliness

- 19 reports were filed timely.
- 1 report was filed late.

20

Review/Certification Timeliness

- All 20 reports were reviewed and certified timely.

Ethics Program Review: DOL

Quality of Review

A few of the report files contained reviewer notes or a 278 Checklist, but for the most part there was no reviewer documentation included with the reports. In the interest of documenting all stages of the SF 278 review process, OGE suggested that in the future, ESA includes all relevant reviewer documentation in employee SF 278 files. In addition, reviewers did not use the appropriate boxes to mark the date reports were received by the agency or the date of the initial review. OGE suggested that ESA officials consistently utilize the 278 Checklist when reviewing public reports.

Employment and Training Administration

Of 21 public reports required to be filed by ETA employees in 2005, 6 fell under the responsibility of SOL and were included in the total for SOL/OSEC. The remaining 15 reports consisted of:

Type of Report

- 15 annual reports

Filing Timeliness

- All 15 reports were filed timely.

Review/Certification Timeliness

- All 15 reports were reviewed and certified timely.

Quality of Review

There was no reviewer documentation included in any of the files. OGE suggested that in the future, ETA includes all relevant reviewer documentation in employee SF 278 files.

Mine Safety and Health Administration

Of the 13 public reports required to be filed by MSHA employees, 3 fell under the responsibility of SOL and were included in the total for SOL/OSEC. The remaining 10 consisted of:

Type of Report

- 10 annual reports

Ethics Program Review: DOL

Filing Timeliness

- All 10 reports were filed timely.

Review/Certification Timeliness

- All 10 reports were initially reviewed timely.
- Some protracted final review and certification occurred due to ethics official requests for additional information from filers.

Quality of Review

Extensive reviewer documentation was included in each file, such as notes, e-mails, and 278 Checklists.

Occupational Safety and Health Administration

Of the 24 reports required to be filed by OSHA employees, 4 fell under the responsibility of SOL and were included in the total for SOL/OSEC. The remaining 20 reports consisted of:

Type of Report

- 20 annual reports

Filing Timeliness

- All 20 reports were filed timely.

Review/Certification Timeliness

- All 20 reports were certified timely.

Quality of Review

All 20 reports were certified incorrectly, as the certifying official mistakenly signed in the space reserved for the signature of the initial reviewer. OGE pointed out this mistake at the time of the review, and OSHA indicated that care would be taken in the future to avoid such mistakes. In addition, reviewers did not use the appropriate box to mark the date received by the agency. OGE suggested that OSHA officials utilize the 278 Checklist when reviewing public reports.

There was no reviewer documentation included with any of the reports. In the interest of documenting all stages of the SF 278 review process, OGE suggested that in the future OSHA includes all relevant reviewer documentation in employee SF 278 files.

Ethics Program Review: DOL

Component-Specific Confidential Financial Disclosure Systems

As previously noted, OGE's review revealed minor inconsistencies among components in the quality of the technical review of confidential financial disclosure reports and in the maintenance of documentation. As a result, OGE made suggestions to help correct the inconsistencies. The recent implementation of individualized training for reviewers should address the suggestion.

Office of the Solicitor/Office of the Secretary

SOL/OSEC does not have any confidential filers.

Employment Standards Administration

ESA had a total of 263 employees at DOL Headquarters and field offices who were required to file a confidential financial disclosure report in 2005. According to ESA officials, 262 of the reports were filed. OGE reviewed all 16 confidential reports required to be filed by employees located at DOL Headquarters. The 16 reports consisted of:

Type of Report

- 14 annual reports
- 2 new entrant reports

16

Filing Timeliness

- 14 reports were filed timely.
- 2 reports were filed late.

16

Review/Certification Timeliness

- All 16 reports were reviewed and certified in a timely manner.

Quality of Review

No reviewer documentation was included in the files. OGE suggested that in the future, ESA includes all relevant reviewer documentation in employee files.

Ethics Program Review: DOL

Employment and Training Administration

ETA had a total of 214 employees nationally who were required to file a confidential report in 2005. According to ETA officials, 213 of those reports were filed. OGE reviewed a sample of 35 confidential reports. The 35 reports consisted of:

Type of Report

- 35 annual reports

Filing Timeliness

- 20 were filed timely.
- 15 were filed late.

35

Review/Certification Timeliness

- All 35 reports were reviewed and certified timely.

Quality of Review

The date received by the agency was omitted from the reports. OGE suggested ETA officials utilize the 450 Checklist to avoid future similar omissions. Reviewer documentation was included with some of the reports. OGE suggested that in the future ETA includes relevant reviewer documentation in all files.

Mine Safety and Health Administration

MSHA had a total of 1,571 employees who were required to file a confidential financial disclosure report in 2005. According to MSHA officials, 1,567 of those reports were filed. OGE reviewed a sample of 119 of the confidential reports. The 119 reports consisted of:

Type of Report

- 114 annual reports
- 5 new entrant reports

119

Ethics Program Review: DOL

Filing Timeliness

- 116 reports were filed timely.
- 3 reports were filed late.

119

Review/Certification Timeliness

- All 119 reports were reviewed and certified timely.

Quality of Review

MSHA's confidential system should be considered a model for the other DOL components in terms of records management. All files OGE reviewed were consistently well-maintained, and included all previous reports from each filer as well as extensive and detailed reviewer documentation in the form of e-mails, notes, and cautionary memoranda. Reviewer documentation not only assists future reviewers by recording information, but also helps to ensure accountability in the ethics program as a whole. Additionally, the 450 Checklist was used during the review of each confidential report and was included in every file. MSHA also has detailed written procedures outlining the records management process for the confidential report files. MSHA's accomplishments in maintaining a consistent and accurate confidential system are especially noteworthy since MSHA is responsible for a significantly larger number of filers than any of the other components OGE reviewed.

Occupational Safety and Health Administration

OSHA had a total of 47 employees who were required to file a confidential financial disclosure report in 2005. According to OSHA officials, all 47 of those reports were filed. OGE reviewed a sample of 43 reports. The 43 reports consisted of:

Type of Report

- 40 annual reports
- 3 new entrant reports

43

Ethics Program Review: DOL

Filing Timeliness

- 37 reports were filed timely.
- 4 reports were filed late.
- 2 new entrant reports were missing the employee's date of appointment and thus OGE was unable to determine whether they were filed timely.

43

Review/Certification Timeliness

- All 43 reports were reviewed and certified timely.

Quality of Review

The initial reviewer's signature was omitted from all 43 of the reports. OGE suggested OSHA officials utilize the 450 Checklist to avoid future similar omissions. Reviewer documentation was not included with the reports. OGE suggested that in the future OSHA includes relevant reviewer documentation in employees' files.

ETHICS EDUCATION AND TRAINING

An ethics education and training program is essential to raising awareness among employees about ethics laws and rules and informing them that an agency ethics official is available to provide ethics counseling. Each agency's ethics training program must include at least an initial ethics orientation for all employees and annual ethics training for covered employees.

The education and training program at DOL headquarters is centralized and is administered by SOL. SOL is also responsible for tracking all DOL training. Regional offices do their own training, although SOL supplies them with training materials such as PowerPoint presentations and DVDs in an effort to standardize ethics training Department-wide. SOL schedules a mandatory training session for all DOL ethics officials annually during which SOL hands out ethics training materials, standardized ethics program-related documents, and the ethics training schedule for the upcoming calendar year. At this session, component ethics officials inform SOL of upcoming conferences or management meetings of DOL staff at which ethics training may be incorporated. Training topics in 2005 were selected based on the frequency of employee inquiries and included: travel gifts, speaking and writing activities, and participation in conferences. Training also included a review of the Principles of Ethical Conduct, and the ethics officials were provided with the 2005 version of OGE's informal ethics guide, "How to Keep Out of Trouble."

SOL provides ethics officials with copies of relevant statutes and regulations, as well as other guidance for use in preparing ethics briefings. Ethics officials are also provided with a copy of a sign-in sheet to be faxed to DOL headquarters for tracking purposes.

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Specialized training, such as component-specific training, is developed as needed. For example, in the years in which live training is required, MSHA and SOL film an ethics video to be used for annual training and distribute it, along with handouts, to MSHA offices nationwide. DOL places an emphasis on developing training for non-career employees, and regularly offers specialized training not required by regulation such as Department-wide retiring-employee seminars, Hatch Act and political activity training, and procurement integrity-issue training. DOL also encourages non-covered employees to attend annual ethics training, and according to ethics officials many non-covered employees do in fact choose to attend. Additionally, Assistant Secretaries attend the same ethics training classes as other employees, demonstrating the importance of ethics training as well as leadership support of the ethics program. SOL works hard to offer many sessions on ethics topics in order to keep the classes small and encourage participation and discussion. Ethics-related scenarios are used in the training session so employees are actively engaged in the learning process. Individual training is also available to all employees upon request. Ethics education and training information is provided on the DOL Intranet (Labor Net), which includes an ethics section with frequently asked questions and a training calendar. OGE considers DOL's efforts in education and training to be a model practice.

Initial Ethics Orientation

Within 90 days from the time an employee begins work for an agency, the agency must provide the employee with initial ethics orientation. Initial ethics orientation must include:

- the Standards and any agency supplemental standards;
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials; and
- at least one hour of official duty time to review the items described above. *See 5 CFR § 2638.703.*

To meet the initial ethics orientation (IEO) requirement, within 90 days from the time an employee begins work at DOL, the employee is provided with:

- the Standards;
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials; and
- at least one hour of official duty time to review the items described above.

IEO is provided at DOL headquarters as part of new employee orientation sessions, and is tracked by SOL. Additionally, components may request specialized IEO for their employees. OGE's review of the IEO materials and other information provided revealed that all relevant requirements were met. The Counsel for Ethics confirmed that all current PAS employees appointed during 2005 received IEO.

Ethics Program Review: DOL

Annual Ethics Training

Public financial disclosure filers are required to receive verbal annual ethics training each year. *See* 5 CFR § 2638.704(a). Verbal training includes training prepared by a qualified instructor and presented by telecommunications, computer, audiotape, or videotape. *See* 5 CFR § 2638.704(c)(2). Other covered employees (e.g., confidential filers) are required to receive verbal annual ethics training at least once every three years and may receive written annual training in the intervening years. *See* 5 CFR § 2638.705(c). The content requirements for both public filers and other covered employees are the same. Agencies are encouraged to vary the content of annual training from year to year but the training must include, at least, a review of:

- the 14 Principles of Ethical Conduct;
- the Standards;
- any agency supplemental standards;
- the Federal conflict of interest statutes; and
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials. *See* 5 CFR § 2638.704(b).

OGE reviewed the following DOL annual ethics training courses:

- *2005 Annual Ethics Training*, which focused on all employees; and
- *How to Keep Out of Trouble*, which also focused on all employees.

OGE's review of these courses found them to meet the annual ethics training content requirements.

ETHICS COUNSELING

The DAEO is required to ensure that a counseling program for agency employees concerning ethics and standards of conduct matters, including post-employment matters, is developed and conducted. *See* 5 CFR § 2638.203. The DAEO may delegate to one or more deputy ethics officials the responsibility for developing and conducting the counseling program. *See* 5 CFR § 2638.204.

OGE's assessment of an ethics counseling program focuses on five factors: (1) accuracy, (2) timeliness, (3) transparency, (4) accountability, and (5) consistency. To determine whether an agency's counseling program successfully addresses these factors, OGE reviews and assesses the program's processes and written procedures. Further, OGE reviews selected samples of advice to assess whether processes and written procedures are effective.

To evaluate the counseling provided to employees at DOL, OGE analyzed samples of memorialized ethics counseling. These samples were reviewed by OGE's DOL Desk Officer. The counseling consisted primarily of e-mails, memoranda, and letters provided by the DAEO, ADAEO, and the Counsel for Ethics.

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The counseling pertained to many aspects of the ethics program including: conflicts of interest; seeking and post employment; gifts from outside sources; teaching, speaking, and writing; and outside activities. The Desk Officer determined that the counseling was timely, consistent, and accurately addressed applicable laws and regulations.

DOL also makes a regular practice of disseminating information in the form of memoranda and informal ethics guides. Additional reference information can be found on Labor Net. Ethics officials indicated that the Secretary and the Solicitor have a very close relationship with the SOL ethics office and consistently ask for counseling related to gifts, speaking engagements, and attendance at events. Ethics officials indicated that both the Secretary and the Solicitor model a "should I do it" versus "can I do it" leadership style and are receptive to all counseling provided.

ENFORCEMENT

The DAEO is required to ensure that (1) information developed by internal audit and review staff, the Office of the Inspector General, or other audit groups is reviewed to determine whether such information discloses a need for revising agency standards of conduct or for taking prompt corrective action to remedy actual or potential conflict of interest situations and (2) the services of the agency's Office of the Inspector General are utilized when appropriate, including the referral of matters to and acceptance of matters from that Office. *See* 5 CFR § 2638.203(b)(11) and (12).

Ethics officials at DOL are meeting the requirements of 5 CFR § 2638.203(b)(11) and (12) through coordinating with DOL's Office of the Inspector General (OIG) on ethics-related matters. DOL's Counsel for Ethics indicated that there is a good reciprocal relationship between OIG and SOL. SOL officials indicated that OIG often consults with them on legal opinions. It appears that satisfactory procedures are in place for the effective exchange of ethics-related information between SOL and OIG officials to resolve enforcement issues.

There were six disciplinary actions taken in 2005 based wholly or in part upon violations of the Standards of Ethical Conduct for Employees of the Executive Branch provisions found at 5 CFR part 2635. All six disciplinary actions were taken at MSHA; no other reviewed component had any such actions. The six MSHA violations included misuse of a Government credit card and misuse of Government property. Disciplinary actions ranged from a written reprimand to suspensions of up to 30 days.

31 U.S.C. § 1353 TRAVEL PAYMENTS

An employee may accept payment of travel expenses from non-Federal sources on behalf of the employee's agency for official travel to a meeting or similar function when specifically authorized to do so by the agency. Agencies must submit semiannual reports of travel payments from non-Federal sources in excess of \$250 to OGE. *See* 31 U.S.C. § 1353.

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Under authority of 31 U.S.C. § 1353, DOL accepts travel payments from non-Federal sources for travel, subsistence, and related expenses incurred by agency employees on official travel for attendance at a meeting or similar function. Based on OGE's review of the two semiannual travel reports filed for the period of April 1, 2005 through March 31, 2006, DOL consistently files with OGE timely semiannual reports of travel payments accepted from non-Federal sources of more than \$250 per event. No travel was reported from components under review for the period of April 1, 2005 through September 30, 2005. For the period of October 1, 2005 through March 31, 2006, two travel payments from OSHA were reported. An examination of relevant documentation indicated that the payments were approved and accepted in compliance with 31 U.S.C. § 1353.

DOL has detailed written policies and procedures that include: DOL's general guidance for acceptance of travel payments from non-Federal sources, specific conditions for acceptance of travel payments from non-Federal sources, and conflict of interest analysis information.

SUMMARY

OGE's review determined that there is reasonable assurance that the performance and management of DOL's ethics program is effective.

OGE's review also identified several model practices that DOL has implemented. Model practices at DOL include: offering education and training that exceed requirements and engaging leadership involvement in supporting the ethics program. Commitment and action by agency leadership is the keystone for ensuring the integrity of an agency's ethical culture and for fostering public confidence in the decision-making processes of Government. Leadership involvement in the ethics program at DOL is extensive. Notably, DOL's Solicitor met with OGE's review team during the course of the review.

If you have comments or would like to discuss the report, please contact Dale Christopher, Associate Director for Program Reviews, at 202-482-9224.