



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

December 5, 2013

Alice M. Ritter
Designated Agency Ethics Official
Appraisal Subcommittee
1401 H Street NW, Suite 760
Washington, DC 20005

Dear Ms. Ritter:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the Appraisal Subcommittee (ASC) to determine how the three recommendations from our June 2013 report have been addressed.

OGE recommended that the ASC develop a plan to address the vulnerabilities in the financial disclosure program which included a mechanism for tracking filers, due dates, and submission dates; clear follow-up and escalation procedures if a filer is delinquent submitting a report; a reminder system to ensure timely filing, review, and certification of financial disclosures; and a reference list of assets posing potential conflicts of interest. In response to OGE's recommendation, the ASC developed a tracking form to record financial disclosure due dates, reminder notification dates, extension requests, and filer submission dates. The ASC's revised financial disclosure policy document provides ethics official contact information, instructions on filing reminders, procedures for addressing delinquent financial disclosure filers, and a discussion of those financial holdings which may pose conflicts of interest to ASC employees. ASC ethics officials provided the revised financial disclosure policy to all employees. OGE considers these actions responsive to the recommendation. Therefore, the recommendation is closed.

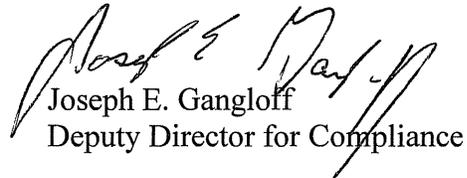
OGE recommended that the ASC develop a plan to provide ethics officials with training on financial disclosure review and certification. In response to OGE's recommendation, ASC ethics officials reviewed online financial disclosure training provided by OGE, registered for OGE's Intensive Curriculum in Ethics, and routinely check OGE's website for online or classroom training opportunities. OGE considers these actions responsive to the recommendation. Therefore, the recommendation is closed.

OGE recommended that the ASC develop a plan to address new employees' initial ethics orientation which included a mechanism for tracking a new employee's start date, training completion date, and a reminder system to notify ethics officials prior to the training deadline if initial ethics orientation has not been completed. In response to OGE's recommendation, ASC ethics officials implemented a tracking spreadsheet that records each employee's annual training

completion status, calculates initial ethics orientation due date, and highlights incomplete initial ethics training one week prior to the training deadline. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

Based on OGE's follow-up, we have determined that the ASC has adequately addressed the three recommendations from the June 2013 report. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9220 if you require any additional information.

Sincerely,



Joseph E. Gangloff
Deputy Director for Compliance