

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



July 31, 2018

Michael Gosliner
General Counsel and
Designated Agency Ethics Official
Marine Mammal Commission
4340 East-West Highway, Suite 700
Bethesda, MD 20814

Dear Mr. Gosliner:

As a result of its review of the Marine Mammal Commission (MMC) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its December 2016 review report. OGE closed one of the recommendations prior to the report's publication; the other recommendation was left open. OGE conducted a follow-up review in January of this year, but was unable to close the recommendation at that time. OGE recently conducted a second follow-up review to assess whether MMC has taken sufficient action to resolve the deficiencies underlying the remaining recommendation. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that all Special Government Employees (SGE) serving on MMC's Committee of Scientific Advisors on Marine Mammals (the Committee) file required confidential financial disclosure reports before the Committee's first meeting. Note: As a result of OGE's initial follow-up review, the requirement that the SGEs' reports must also be certified before the Committee's first meeting was added to the recommendation.	Eight members of the Committee were required to file confidential financial disclosure reports in 2018. OGE determined that all eight of their reports were filed and certified before the Committee's first meeting.	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

Report No. 18-40IF

