



# Ethics Program Review

U.S. Department of Homeland Security Headquarters

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The U.S. Office of Government Ethics (OGE) conducted a review of the U.S. Department of Homeland Security (DHS) Headquarters ethics program from May through July 2018. The following summarizes the results of that review.

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## Objectives, Scope and Methodology

**Objectives:** OGE provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. The Ethics in Government Act gives OGE the authority to evaluate the effectiveness of executive agency ethics programs.<sup>1</sup> OGE uses this evaluation authority largely to conduct reviews of agency ethics programs. 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 as set forth in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program.

**Scope:** OGE’s review focused on the DHS Headquarters ethics program.

**Methodology:** OGE examined a variety of documents provided by DHS ethics officials, including DHS’s response to OGE’s 2017 Annual Agency Ethics Program Questionnaire, written procedures for administering the financial disclosure program, samples of public and confidential financial disclosure reports filed in 2017, ethics training materials, and a sample of the ethics advice and counseling provided to employees. In addition, OGE met with agency ethics officials to clarify the information gathered, follow up on issues identified during the review, and discuss ethics program operations in further detail.

## Agency Background

DHS is the third largest department of the U.S. government, with a workforce of 229,000 employees. The department operates under the leadership of the Secretary, a presidentially appointed, Senate-confirmed official.

<sup>1</sup> See 5 U.S.C. app. § 402 and 5 C.F.R. part 2638.

The DHS vision is to ensure a homeland that is safe, secure, and resilient against terrorism and other hazards. To support this vision, there are five homeland security missions: prevent terrorism and enhancing security; secure and manage our borders; enforce and administer immigration laws; safeguard and secure cyberspace; and ensure resilience to disasters.

## **Program Administration**

DHS's ethics program is administered by the Ethics Law Division (ELD), a part of the Office of the General Counsel (OGC) at DHS Headquarters. ELD is headed by the Principal Deputy General Counsel, who serves as the Designated Agency Ethics Official (DAEO), while the Associate General Counsel for Ethics serves as the Alternate DAEO (ADAEO). The ADAEO's position was vacant at the time of OGE's review. The Deputy Associate General Counsel was acting as the ADAEO. The DAEO and ADAEO are typically assisted by seven full-time staff: five attorney-advisors, who are designated deputy ethics officials, and two management analysts. However, at the time of OGE's review, two of the attorney-advisors positions and the two management analyst positions were vacant.

During the review, ethics officials asserted that the departure of a significant number of ELD personnel, extended absence of personnel on military leave, technical problems with the deployment of an electronic filing system for confidential reports, difficulties obtaining timely new-hire information and the presidential transition had a substantial impact on ELD's ability to meet some programmatic ethics requirements in 2017.

## **Financial Disclosure**

Title I of the Ethics in Government Act requires that agencies administer public and confidential financial disclosure systems. Financial disclosure serves to prevent, identify, and resolve conflicts of interest by providing for a systematic review of the financial interests of officers and employees. The financial disclosure process also offers an opportunity for ethics officials to provide ethics-related counseling to report filers.

To evaluate DHS's financial disclosure systems, OGE evaluated the required written procedures for administering the systems, DAEO notification requirements, and a sample of public and confidential financial disclosure reports that were required to be filed by DHS headquarters employees.

### **Financial Disclosure Written Procedures**

Each executive branch agency must establish written procedures for collecting, reviewing, evaluating, and where applicable, making publicly available financial disclosure reports filed by the agency's officers and employees.<sup>2</sup> OGE examined DHS's written procedures and determined that they comply with relevant requirements.

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<sup>2</sup> See 5 U.S.C. app. § 402(d)(1).

## Notices to the DAEO

The lead human resources official is required to notify the DAEO of all appointments to positions that require incumbents to file public or confidential financial disclosure reports no later than 15 days after the appointment. The lead human resources official must also notify the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports no later than 15 days after termination.<sup>3</sup>

At DHS, the Chief Human Capital Office (CHCO) is responsible for providing ELD with these notifications. However, OGE determined that the required notices were not being provided timely. ELD is working with CHCO to implement a new enterprise-wide human resources system to ensure the prompt notifications to ELD of these appointments. ELD reported that in 2018 CHCO started providing these reports every two weeks.

## Public Financial Disclosure

Within 30 days of assuming a covered public filing position, an individual must file a public financial disclosure report.<sup>4</sup> The individual must subsequently file an annual report by May 15 each year and a termination report within 30 days of departing the public filing position.<sup>5</sup> The reports are required to be reviewed for potential conflicts of interest and certified within 60 days of receipt by the ethics office, unless additional information is being sought from the filer or remedial action is being taken.<sup>6</sup>

To evaluate the administration of the DHS Headquarters public financial disclosure system, OGE examined a sample of 30 new entrant, 41 annual, and 35 termination reports that were required to be filed in 2017. Table 1 below presents the results of OGE’s examination.

**Table 1. OGE’s Examination of DHS Headquarters Public Financial Disclosure Reports**

	New Entrant		Annual		Termination		Total	
<b>Reports Examined</b>	30		41		35		106	
<b>Filed Timely</b>	20	(67%)	40	(98%)	28	(80%)	88	(83%)
<b>Reviewed within 60 Days of Receipt</b>	15	(50%)	19	(46%)	17	(48.5%)	51	(48%)
<b>Certified within 60 Days of Receipt</b>	10	(33%)	14	(34%)	17	(48.5%)	41	(39%)

As noted in Table 1 above, only 67% of new entrant reports examined were filed timely. Ethics officials explained that ELD did not receive timely notification about the appointment of

<sup>3</sup> See 5 C.F.R. § 2638.105(a)(1) and (2).

<sup>4</sup> See 5 C.F.R. § 2634.201(b).

<sup>5</sup> See 5 C.F.R. § 2634.201(a) and (e).

<sup>6</sup> See 5 C.F.R. § 2634.605.

public filers from CHCO, which often identified new filers months after they on-boarded. Therefore, ELD was unable to notify employees entering public filing positions of the filing requirement in time to permit them to timely file their new entrant reports.

Additionally, Table 1 shows that only 51 (48%) reports examined by OGE were reviewed within 60 days of receipt, and only 41 (39%) were certified timely. Ethics officials explained that significant ethics personnel turnover, compounded by a lack of enforcement of program standard operating procedures, prevented ELD from being able to verify whether the public financial disclosure reports examined by OGE were reviewed within the first 60 days. Ethics officials indicated that in 2018, ELD implemented mandatory use of *Integrity's* "end initial review" feature to record the completion of the initial review and proposed the same as a best practice to DHS components.

OGE reminds ELD that the protracted review and certification of financial disclosure reports increases the risk that employees might take official actions that affect their financial interests, in violation of criminal conflict of interest law. Therefore, OGE recommends that DHS commit the necessary resources to ensure that all public financial disclosure reports be reviewed within 60 days of receipt and certified soon after. OGE believes that the protracted or late review and certification of public financial disclosure reports could be alleviated by assigning additional staff to review the reports.

#### Recommendations

1. Ensure that new entrant public financial disclosure reports are filed timely.
2. Ensure that public financial disclosure reports are certified within 60 days of receipt, unless further information is being sought from a filer.

#### **Confidential Financial Disclosure**

Within 30 days of assuming a covered confidential filing position, an individual must file a confidential financial disclosure report.<sup>7</sup> The individual must also subsequently file an annual report by February 15 each year.<sup>8</sup> The reports are required to be reviewed for potential conflicts of interest and certified within 60 days of receipt by the ethics office, unless additional information is being sought from the filer or remedial action is being taken.<sup>9</sup>

In 2017, DHS Headquarters deployed the U.S. Customs and Border Protection Human Resources Business Enterprise (HRBE) system for confidential financial disclosure electronic filings. DHS Headquarters deployed HRBE to more readily identify confidential filers. However, ELD encountered challenges in the HRBE deployment that stemmed from personnel record-keeping issues. As a result, OGE found that the master list of DHS Headquarters confidential filers contained errors and misclassified some employees as filers while assigning

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<sup>7</sup> See 5 C.F.R. § 2634.903(b).

<sup>8</sup> See 5 C.F.R. § 2634.903(a).

<sup>9</sup> See 5 C.F.R. § 2634.605.

the wrong type of reports to others. Ethics officials indicated that the challenges surrounding deployment of HRBE resulted in the need to provide all filers a 90-day extension for filing.

To evaluate the administration of the DHS Headquarters confidential financial disclosure system, OGE examined a sample of 42 new entrant and 60 annual reports that were required to be filed by in 2017. Table 2 below presents the results of OGE’s examination.

**Table 2. OGE’s Examination of DHS Headquarters Confidential Financial Disclosure Reports**

	New Entrant		Annual		Total	
<b>Reports Examined</b>	42		60		102	
<b>Filed Timely</b>	39	(93%)	56	(93%)	95	(93%)
<b>Reviewed within 60 Days of Receipt</b>	38	(90%)	57	(95%)	95	(93%)
<b>Certified within 60 Days of Receipt</b>	16	(38%)	31	(52%)	47	(46%)

Table 2 shows that only 47 (46%) reports examined by OGE appear to have been certified within 60 days of receipt. Ethics officials explained that in 2018, per ELD requirements, HRBE will be deploying a new process to allow for recognition and documentation of initial review, among other system improvements, to ensure greater record keeping compliance regarding timeliness of report review and thus more accurate tracking of report certification. Further, due to ELD personnel shortages, ELD has instituted the training of volunteer attorneys to be designated as ethics officials for organizational client offices to ensure more timely review and certification of confidential reports.

Recommendation

3. Ensure that confidential financial disclosure reports are certified within 60 days of receipt, unless further information is being sought from a filer.

**Education and Training**

Each executive branch agency must carry out a government ethics education program to teach employees how to identify government ethics issues and obtain assistance in complying with government ethics laws and regulations. The training program is to include: briefings for certain Presidentially appointed, Senate confirmed (PAS) officials; notices for prospective employees and newly appointed supervisors regarding their ethics-related obligations; initial ethics training for new employees; and annual ethics training for public and confidential financial disclosure report filers and certain other employees.<sup>10</sup> An ethics education program is essential to raising awareness among employees about the ethics laws and rules that apply to them and the availability of agency ethics officials to provide ethics counseling.

<sup>10</sup> See 5 C.F.R. Part 2638 Subpart C.

## **Ethics Briefings for Certain Agency Leaders**

PAS officials, except for those in positions identified in 5 C.F.R. § 2634.201(c)(2), must complete an ethics briefing to discuss their immediate ethics obligations no later than 15 days after their appointment, unless the DAEO grants an extension. Any extension of more than 15 days requires the DAEO to make a written determination that extraordinary circumstances make it necessary to provide the briefing at a later date.<sup>11</sup> Three of the four PAS officials at DHS headquarters completed the briefing within 15 days of appointment during the period covered by OGE's review. OGE learned that the fourth PAS official received the briefing late due to priority work and illness. The DAEO did not grant an extension for the ethics briefing. However, the briefing was immediately rescheduled and was completed at the earliest possible time. The PAS official was already serving in the government at the time of his appointment, and had received extensive ethics guidance during the pre-confirmation process.

## **Notices to Prospective Employees**

Written offers of employment for positions covered by the Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) must include: a statement regarding the agency's commitment to government ethics; notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes; information on how to obtain additional information on applicable ethics requirements; and, where applicable, notice of the time frame for completing initial ethics training and information regarding the filing of new entrant financial disclosure reports.<sup>12</sup>

ELD coordinated with CHCO Human Capital Policy and Programs to direct that DAEO-approved language be included in all letters to prospective employees at the beginning of 2017. However, there were no written procedures in place in 2017. The DAEO reviewed the interim written procedures for issuing notices in 2018 which CHCO implemented in April 2018. DHS notices will be integrated into a new enterprise-wide human resource system which will enable more automated compliance with this requirement.

OGE examined samples of the DHS's notices and determined that they comply with relevant requirements.

## **Initial Ethics Training**

Each new employee subject to the Standards of Conduct must complete initial ethics training (IET) that meets the requirements of 5 C.F.R. § 2638.304 within three months of appointment, unless excluded by the DAEO. The training must be interactive and focus on government ethics laws and regulations that the DAEO deems appropriate. The training must address: financial conflicts of interest; impartiality; misuse of position; and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE

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<sup>11</sup> See 5 C.F.R. § 2638.305.

<sup>12</sup> See 5 C.F.R. § 2638.303.

or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.<sup>13</sup>

OGE reviewed the materials DHS used to provide initial ethics training to new Headquarters employees in 2017 and determined that the materials met applicable content requirements. ELD conducted IET live every two weeks as part of orientation sessions for new career employees. ELD receives the roster for the new employee orientation every two weeks from CHCO. ELD uses the rosters and sign-in sheets to track completion of the IET. ELD reported that 90% of the required employees received IET within three months of appointment. Based on the systems in place, OGE determined there is reasonable assurance that IET is provided to new employees within three months, as required.

### **Annual Ethics Training for Public Filers**

Generally, live training must be provided each calendar year to each employee whose pay is set at Level I or Level II of the Executive Schedule. Live training must also be provided to other employees who are required to file public financial disclosure reports pursuant to 5 C.F.R. § 2634.201(a) every other year, with interactive training provided in the intervening years. The training presentation, whether live or interactive, must focus on government ethics laws and regulations that the DAEO deems appropriate. The training, whether live or interactive, must address: financial conflicts of interest; impartiality; misuse of position; and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.<sup>14</sup>

At DHS Headquarters, the 2017 public filer annual ethics training theme was "Ethical Leadership: Your Role in the DHS Ethics Program." The training was conducted in live in-person sessions or by webinar for all public filers. OGE reviewed the presentation and the written materials that DHS provided along with the presentation and determined that both the presentation and the materials met applicable content requirements.

### **Annual Ethics Training for Confidential Filers and Certain Other Employees**

Generally, interactive training is required to be provided each calendar year to employees who are required to file a confidential financial disclosure report pursuant to 5 C.F.R. § 2634.904; employees appointed by the President and employees of the Executive Office of the President; contracting officers described in 41 U.S.C. § 2101; and, other employees designated by the head of the agency. The training presentation must focus on government ethics laws and regulations that the DAEO deems appropriate. The training must address: financial conflicts of interest; impartiality; misuse of position; and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for

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<sup>13</sup> See 5 C.F.R. § 2638.304.

<sup>14</sup> See 5 C.F.R. § 2638.308.

accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency’s supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency’s ethics office.<sup>15</sup>

At DHS Headquarters, the 2017 confidential filer annual ethics training theme was “Candor and Leadership, Ethics Annual Refresher.” However, ELD was able to implement interactive training for only the acquisition workforce’s confidential filers in 2017. OGE reviewed the computer based interactive training and found that it met applicable requirements. Confidential filers who did not complete the interactive training received written materials via email.

ELD is working to ensure that live or interactive training is provided to all confidential filers in 2018 with the creation of an interactive ethics training module through the DHS Learning Management System (PALMS). In 2017, ELD did not provide confidential filers who received the interactive training the required written materials or written instructions for where they could access to required information. ELD assured OGE that it is rectifying the issue for 2018 training and will ensure all those who receive annual training receive the required written materials.

OGE reviewed training records to determine whether DHS provided annual ethics training to those employees whose public and confidential annual financial disclosure reports OGE examined. Table 3 below presents the results of OGE’s review.

**Table 3. OGE’s Examination of DHS Headquarters Annual Training**

DATA ANALYSIS	Training Format	
	Live	Interactive
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.308(a).</i>		
• Executive Schedule Level I and Level II. <i>See 5 C.F.R. § 2638.308(e)(1).</i>	100%	
• Other PAS and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(2).</i>	100%	
• SES and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(3).</i>	95%	
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.307(a)(d).</i>		
• Employees required to file an annual confidential financial disclosure report. <i>See 5 C.F.R. § 2638.307(a)(1).</i>		38%

Recommendations

4. Ensure that live or interactive training is provided to all confidential filers.
5. Provide written materials to all confidential filers.

<sup>15</sup> *See 5 C.F.R. § 2638.307.*

## Model Practice

- ELD provided additional specialized live training for DHS interns, fellows, acquisition officials supervisors, and front office staff.

### **Ethics Counseling**

The DAEO, acting directly or through other officials, is responsible for providing advice and counseling to prospective and current employees regarding government ethics laws and regulations, and providing former employees with advice and counseling regarding post-employment restrictions applicable to them.<sup>16</sup> A robust ethics counseling program is necessary to ensure that employees receive the guidance they need to comply with the ethics rules.

OGE reviewed a sample of the ethics-related counseling that ethics officials provided to DHS Headquarters employees. The counseling addressed a variety of issues including gift acceptance, outside speaking and other activities, impartiality, and post-employment restrictions. OGE found the counseling to be consistent with applicable laws and regulations.

### **Agency-Specific Ethics Rules**

An agency may modify or supplement the Standards of Conduct, with the concurrence of OGE, to meet the particular needs of that agency.<sup>17</sup> A supplemental standards of conduct regulation is issued jointly by the agency and OGE and is published in title 5 of the Code of Federal Regulations.

The DHS supplemental standards of conduct regulation took effect on March 7, 2016. This supplemental regulation requires all DHS employees, except special government employees, to obtain written approval prior to engaging in outside employment.

To evaluate employees' compliance with DHS's prior approval requirement, OGE reviewed the outside activities that were reported on the public and confidential financial disclosure reports that were examined during the evaluation of the DHS Headquarters financial disclosure systems. 23 outside employment activities were disclosed in these financial disclosure reports. OGE determined that seven were outside activities requiring prior approval under DHS's supplemental regulation. OGE further determined that in four instances, employees complied with prior approval requirements. OGE brought the remaining three instances to the attention of DHS ethics officials, who then initiated the approval process. Given that the DHS supplemental standards of conduct regulation took effect in 2016 and its implementation was relatively recent in 2017, OGE is not issuing a recommendation for improvement in this area. However, OGE reminds DHS to ensure that employees receive approval prior to engaging in outside employment, as required by the DHS supplemental standards of conduct regulation.

<sup>16</sup> See 5 C.F.R. § 2638.104 (c)(4).

<sup>17</sup> See Executive Order 12674 and 5 C.F.R. § 2635.105.

## Conflict Remedies

The primary criminal conflict of interest law prohibits an employee from participating in an official capacity in a particular matter in which he or she has a financial interest.<sup>18</sup> Congress included two provisions that permit an agency to issue a waiver of this prohibition in individual cases. Agencies must consult with OGE, where practicable, prior to issuing such a waiver.<sup>19</sup> DHS did not issue any waivers in 2017.

Additionally, the Ethics in Government Act expressly recognizes the need for PAS nominees to address actual or apparent conflicts of interest by requiring written notice of the specific actions to be taken in order to alleviate the conflict of interest.<sup>20</sup> This written notice is commonly known as an “ethics agreement.” In 2017, nine DHS PAS officials entered into ethics agreements. All of these officials complied with the terms of their agreements.

## Enforcement

Executive branch offices are required to notify OGE when they refer a potential violation of a conflict of interest law to the Department of Justice (DOJ).<sup>21</sup> DHS’s Office of Inspector General (OIG) is responsible for conducting investigations of potential violations of the criminal conflict of interest laws, making any necessary referrals to DOJ, and concurrently notifying OGE of any such referrals. In 2017, DHS’s OIG notified OGE of its referral of two potential violations to DOJ. Additionally, DHS reported no disciplinary actions based wholly or in part upon violations of the Standards of Conduct in 2017.

## Special Government Employees

A special government employee (SGE) is an officer or employee of the executive or legislative branch retained, designated, appointed, or employed to perform official duties, full-time or intermittently, for not more than 130 days in any 365-day period. SGEs are required to file financial disclosure reports and receive ethics training.<sup>22</sup>

DHS charters and maintains advisory committees under the Federal Advisory Committee Act (FACA). Six of the seven committees were active in 2017 and had SGE members. To evaluate the ethics services provided to SGE advisory committee members, OGE selected the Homeland Security Advisory Council (HSAC) for review.

### Financial Disclosure

In 2017, there were 39 SGE members of the HSAC and 17 of them attended the only committee meeting of the year. OGE requested their confidential financial disclosure reports for examination. ELD was only able to provide 7 of the 17 requested reports. Ethics officials

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<sup>18</sup> See 18 U.S.C. § 208.

<sup>19</sup> See Executive Order 12674.

<sup>20</sup> See 5 U.S.C. app. § 110.

<sup>21</sup> See 5 C.F.R. § 2638.206.

<sup>22</sup> See 18 U.S.C. § 202(a).

indicated that the attorney who managed the HSAC in 2017, and who later left the agency, did not properly record some of his work. Ethics officials could not confirm whether the reports were never filed or were lost. The attorney position has since been re-filled. The new attorney will be assigned with ensuring that ethics requirements are complied with for HSAC members. In 2018 ELD has also worked on developing a new tracking system for the SGE financial disclosure filers and standardizing internal operating procedures to ensure compliance with the SGE and Federal Advisory Committee ethics program requirements.

Table 4 below presents the results of OGE’s examination of the seven available HSAC reports.

**Table 4. OGE’s Examination of HSAC Confidential Financial Disclosure Reports**

<b>Reports Examined</b>	7	
<b>Filed Timely</b>	7	(100%)
<b>Certified Timely</b>	6	(86%)

Recommendation

6. Ensure that confidential financial disclosure reports required from all SGE advisory committee members are filed.

Ethics Training

In 2017, ELD provided in-person ethics training to 37 (95%) of the 39 HSAC members. OGE determined that this training met applicable content requirements.

**Agency Comments**

DHS supports and continues to strive to fulfill the Ethics Law Division (ELD) resourcing and staffing needs. Since the program review, this has included selection of a new Alternate Designated Agency Ethics Official and two staff attorneys. The remaining staff vacancies are in the process of being filled. DHS is also evaluating productivity of all aspects of the program and seeking creative solutions, such as leveraging technology to improve program efficacy and efficiency.

Recommendations

1. Ensure that new entrant public financial disclosure reports are filed timely.

ELD continues bi-weekly engagements with the Chief Human Capital Office to institutionalize the process to ensure OHS ethics officials' timely receipt of notification of personnel actions triggering financial disclosure requirements.

2. Ensure that public financial disclosure reports are certified within 60 days of receipt, unless further information is being sought from a filer.

The table measures only reports certified within 60 days of submission. This does not reflect the timeliness of initial reviews. ELD implemented new standard operating procedures to ensure the records reflect the timeliness of initial review of financial disclosures. The records now indicate when review was completed but reports could not immediately be certified because additional information was sought from a filer or conflict remediation was required before certification is permissible under OGE regulations. Thus, the data does not reflect the substantive conflict review central to the financial disclosure review process.

3. Ensure that confidential financial disclosure reports are certified within 60 days of receipt, unless further information is being sought from a filer.

As detailed above under recommendation 2, ELD implemented the same process for confidential financial disclosure filers to ensure the records reflect the timeliness of initial review of reports, which could not be certified due to required clarification or remediation of conflicts needed before certification was appropriate.

4. Ensure that live or interactive training is provided to all confidential filers.

ELD projects that most confidential filers will receive live training and a smaller percentage will receive interactive training in 2018.

5. Provide written materials to all confidential filers.

ELD prepared the required written materials for distribution to all attendees of ethics training with the required ethics rules as well as directions on how to access OHS' internal ethics website to obtain additional information and the contact information for ethics officials.

6. Ensure that confidential financial disclosure reports required from all SGE advisory committee members are filed.

Besides the efforts the report already discusses, ELD reached out to all Designated Federal Officials (DFO) to remind them of the ethics program requirements for annual training and confidential financial disclosure report filings for all active members of each Headquarters' Federal Advisory Committee. This included speaking at a quarterly DFO meeting as well as email follow up.