

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



December 18, 2018

Kathleen Silbaugh
General Counsel and
Designated Agency Ethics Official
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Dear Ms. Silbaugh:

As a result of its review of the National Transportation Safety Board (NTSB) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its October 2017 review report. OGE recently conducted a follow-up review to assess whether NTSB has taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

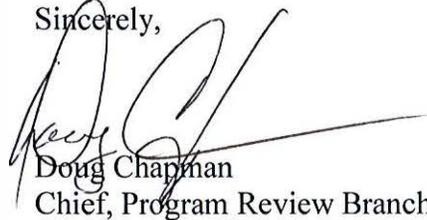
	Recommendation	Agency Action and OGE Finding	Status
1	Ensure proper procedures are in place to notify ethics officials of personnel actions that would change a filer's status.	NTSB ethics officials currently use the Staff Entry and Exit System (SEES) to track the arrival of new employees, internal reassignments, promotions, and separations. OGE verified that SEES generated timely notices to ethics officials. These notices will allow ethics officials to advise new filers of their obligations in time to file reports before the applicable deadline.	Closed
2	Evaluate the matters the one late non-PAS public filer has worked on since his promotion to determine whether his personal financial interests were likely to create a conflict of interest with his official responsibilities and take appropriate action if any potential conflict is identified.	The particular filer has completed a new entrant report for 2017 that can be viewed on Integrity and NTSB ethics officials have done a complete conflict of interest analysis finding no risk of a financial conflict of interest.	Closed



3	Ensure all public financial disclosure reports are certified timely.	OGE examined 26 public financial disclosure reports filed in 2018. Of those 26 reports, 24 were not certified within 60 days of the date they were filed. Of the 24 reports not certified within 60 days of the date of filing, 18 still had not been certified by the time of OGE's follow-up in November 2018.	Open
4	Ensure all confidential financial disclosure reports are certified timely.	OGE examined 25 confidential financial disclosure reports filed in 2018. Of those 25 reports, 19 were certified within 60 days. Of the six reports that were past the 60-day period, five were five days or less past the 60-day period.	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9223.

Sincerely,



Doug Chapman
Chief, Program Review Branch