



January 23, 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 recently conducted a follow-up review to determine if MMC resolved the deficiencies underlying the remaining recommendation:

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that all Special Government Employees (SGEs) serving on MMC's Committee of Scientific Advisors on Marine Mammals (Committee) file required confidential financial disclosure reports before the committee's first meeting.	<p>In 2015, MMC deviated from its written procedures and allowed SGEs on the Committee to file after their first meeting. In 2017, MMC resumed collecting confidential reports <i>before</i> the first Committee meeting.</p> <p>OGE examined the 8 confidential reports filed by SGEs on the Committee in 2017, and found that only 6 (75%) were filed before the first Committee meeting. The DAEO stated that he discussed the contents of the reports with the filers prior to the meeting, but did not certify the reports until after the meeting. OGE is leaving the recommendation open and reminds MMC that all reports are to be reviewed and certified prior to the Committee's first meeting.</p>	Open



Mr. Michael Gosliner
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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,

A handwritten signature in black ink, appearing to read 'Dale Christopher', written in a cursive style.

Dale Christopher
Deputy Director for Compliance