

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Bureau of Land Management

Follow-up to OGE Report Number: 16-40I and 20-21IF

Report No.: 21-48IF

Date: September 29, 2021

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch

As a result of its review of the Bureau of Land Management (BLM) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its June 2016 review report. Due to an extensive reorganization of their ethics program, which involved significant structural and personnel changes, BLM twice asked to postpone their initial follow up review to allow time to implement changes. OGE conducted the initial follow-up review in May 2020 but was only able to close three of the five recommendations at that time. OGE recently conducted a second follow-up review. The results are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
4	Ensure new entrant confidential financial disclosure reports are filed by the established deadline.	OGE reviewed reports for all employees who entered confidential filing positions in calendar year 2020. OGE found that 80% of reports were filed timely.	Closed
5	Ensure new employees complete initial ethics training within 90 days. (A regulatory update changed the requirement from “90 days” to “three months.”)	OGE examined training records for all employees who onboarded at BLM in calendar year 2020. OGE found that 92% received initial ethics training within 90 days, as required.	Closed

Based on the results of OGE’s follow-up review, all recommendations are now closed.