

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Selective Service System

Follow-up to OGE Report Number: 20-39I

Report No.: 22-48IF

Date: August 2, 2022

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

As a result of its review of the Selective Service System (SSS) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its August 2020 inspection report. OGE conducted a follow-up review to assess whether SSS has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports and notifies the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1) and <i>See</i> 5 C.F.R. § 2638.105(a)(2).	<u>Agency Action:</u> SSS provided the Standard Operating Procedures, Human Resources Order 20-01, which include the process HR will use to notify the Designated Agency Ethics Official (DAEO) of all appointments to and terminations from positions that require incumbents to file public financial disclosure reports. <u>OGE Finding:</u> OGE recognizes that SSS has a limited number of positions whose incumbents are required to file public financial disclosure reports, thereby making it difficult to demonstrate an effective process for identifying filers is in place. OGE will conduct an additional follow-up at a later date.	Open
2	Ensure the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<u>Agency Response:</u> SSS provided the SOP titled HR Order 20-01 to OGE. The SOP includes the process the Human Resources Officer (HRO) will use to comply with the notification requirements at 5 C.F.R. § 2638.105. <u>OGE Finding:</u> OGE examined the most recent email notification from the SSS Human Resources Specialist to the Ethics Office notifying ethics officials that an incoming staff member was entering a position whose incumbent was required to file a confidential report. The notice satisfied relevant requirements.	Closed

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3	Ensure SSS has an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<u>OGE Finding:</u> OGE reviewed five notices sent with written offers of employment in 2022. Four notices were to prospective new employees and one was to a new supervisor. Of the four notices to prospective employees, three included the required information. One notice to a prospective new employee required to file a confidential report did not advise the employee of the filing requirement. The notice to the new supervisor did not contain the required information.	Open
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Based on the results of OGE's follow-up review, recommendation 2 is closed. OGE will conduct an additional follow-up review in approximately 6 months to assess whether SSS has taken sufficient action to resolve the deficiencies underlying recommendations 1 and 3, which remain open.