

UNITED STATES OFFICE OF GOVERNMENT ETHICS



November 15, 2016

Marcella Goodridge-Keiller
Deputy Assistant General Counsel and Alternate
Designated Agency Ethics Official
Department of Education
400 Maryland Avenue, SW, Room 6C135
Washington, DC 20202-2110

Dear Ms. Goodridge-Keiller:

As a result of its review of the Department of Education's (Education) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its September 2015 ethics program review report. OGE conducted a follow-up review in March 2016 and was not able to close the recommendation because it wasn't clear whether the actions Education had taken would resolve the underlying deficiency. OGE recently conducted a second follow-up review in October 2016. Based on the results of the second follow-up review, OGE has determined that this recommendation should remain open. The results of our second follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Continue to implement corrective action to ensure that new entrant confidential reports are filed timely.	<p>During OGE's first follow-up review in March 2016, OGE found that the Ethics Division was taking action to help resolve the issue of late new entrant confidential filing. However, OGE concluded that more time was needed to determine whether these actions were effective.</p> <p>During OGE's current follow-up review, OGE examined 19 new entrant confidential reports filed with the Ethics Division in 2016. Of the 19 reports OGE examined, 15 were filed late.</p>	Open

OGE will conduct a third follow-up in February 2017 to determine whether this recommendation can be closed. OGE reminds Education that timely filing of financial disclosure reports is critical to detecting and preventing conflicts of interest and therefore strongly encourages the Ethics Division to make every effort to improve filing timeliness. I

Ms. Marcella Goodridge Keiller
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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 be 'Dale Christopher', written over a horizontal line.

Dale Christopher
Deputy Director for Compliance