

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



August 22, 2018

Craig M. Keats  
General Counsel and  
Designated Agency Ethics Official  
Surface Transportation Board  
395 E. Street, SW  
Washington, DC 20426

Dear Mr. Keats:

As a result of its inspection of the Surface Transportation Board (STB) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its March 2018 inspection report. OGE closed one of recommendations prior to the report's publication; the other recommendation was left open. OGE recently conducted a follow-up review to assess whether STB has taken sufficient action to resolve the deficiencies underlying the recommendation. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Take appropriate action to ensure that the Human Resources Office promptly notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports.	One new entrant report was required to be filed in 2017. OGE examined the new entrant report during its initial inspection and found that it was filed late. The ADAEO was not notified by STB's Human Resources Office that the filer had transferred into a covered filing position. STB's ADAEO and the Board's HR Director worked together to implement procedures to ensure that HR employees would notify the DAEO or ADAEO of appointments to positions that require the filing of a confidential financial disclosure report. During its follow-up review, OGE examined two new entrant confidential reports filed since its initial inspection and found that both reports were filed, reviewed, and certified timely.	Closed

Report No. 18-43IF



Mr. Craig M. Keats  
Page 2

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". The signature is stylized with a large initial "D" and "C".

Dale Christopher  
Deputy Director for Compliance