



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

January 30, 2012

Jason F. Kaar
Deputy General Counsel
Uniformed Services University of the
Health Sciences
4301 Jones Bridge Road (A1030)
Bethesda, MD 22314

Dear Mr. Kaar:

The United States Office of Government Ethics (OGE) recently conducted an on-site follow-up review of the ethics program at the Uniformed Services University of the Health Sciences (USUHS) to determine whether the improvements recommended in our April 2011 report have been achieved.

During OGE's initial review of USUHS' ethics program, OGE found two issues regarding financial disclosure. First, new entrant confidential financial disclosure filers were not being identified timely. Second, some public financial disclosure reports examined during the review included examples of incomplete reporting of financial interests but were still certified by ethics officials. OGE's initial report recommended that USUHS, "[B]ring USUHS' financial disclosure program into compliance. Specifically, USUHS ethics officials should ensure that public reports are complete before certifying and should ensure a mechanism is in place to timely identify new entrant filers." OGE's initial report also noted that USUHS took immediate action to address both issues. These actions included correcting previously filed public financial disclosure reports and instituting quarterly reminders to managers to identify new entrant confidential filers.

OGE's follow-up review included an examination of the 2 new entrant confidential financial disclosure reports filed since the initial review. Both reports were filed timely. Ethics officials were considering sending reminders to managers monthly, rather than quarterly. OGE encourages this approach. OGE's follow-up review also examined a sample of 24 public financial disclosure reports filed, reviewed, and certified since the initial review. While the reports examined during the follow-up review exhibited some instances of incomplete reporting, the deficiencies did not appear to be as extensive as those identified in the initial review. Ethics officials immediately agreed to follow up on the newly identified instances of incomplete reporting. USUHS ethics officials should consider attending the advanced financial disclosure review training OGE periodically provides.

A larger sample of reports would be preferable for drawing a conclusion about the success of USUHS' new process for identifying new entrant confidential filers. However, the available evidence does indicate that new entrant filers are being identified timely. Additionally,

USUHS Report No. 12-29F

it appears that USUHS has significantly improved in terms of ensuring that reports are not certified until financial interests are fully reported.

Based on our follow-up, we have determined that USUHS has adequately implemented the recommendation in the April 2011 review report. As a result, OGE has closed the recommendation. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9317 if you require any additional information.

Sincerely,

A handwritten signature in black ink that reads "Rashmi Bartlett". The signature is written in a cursive, flowing style.

Rashmi Bartlett
Associate Director