



August 16, 2018

Scott de la Vega
Designated Agency Ethics Official
Department of the Interior
1849 C Street, NW
MS 7346
Washington, DC 20240

Dear Mr. De la Vega:

As a result of its review of the Department of the Interior (DOI) ethics program, the Office of Government Ethics (OGE) issued 14 recommendations in its June 2016 program review report. OGE conducted a follow up review in September 2017 and closed eight of the recommendations. OGE recently conducted a second follow-up review to assess whether DOI has taken sufficient action to resolve the deficiencies underlying the remaining open recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
2	Improve filing timeliness of new entrant public financial disclosure reports.	Filing timeliness has improved from the 48% cited in OGE's June 2016 program review report to 64% in OGE's first follow-up review to 68% in the current follow-up review. However, improvement is still needed.	Open
3	Improve filing timeliness of termination public financial disclosure reports.	OGE found that filing timeliness for termination reports improved from 75% during the first follow-up review to 86%.	Closed
4	Improve filing timeliness of new entrant confidential financial disclosure reports.	Filing timelines has improved from the 40% cited in OGE's June 2016 program review report to 53% in OGE's first follow-up review to 74% in the current follow-up review. However, improvement is still needed.	Open

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5	Develop and provide evidence of concrete measures taken to improve new entrant filing timeliness as a result of Departmental Ethics Office's coordination with HR offices.	Although improvements are still needed in the public and confidential new entrants' filing timeliness, Interior's progress made in these areas demonstrates that the measures Interior undertook, as discussed in OGE's first follow-up review report, have made a positive impact in addressing the causes of the filing delays.	Closed
9	Provide annual ethics training to all covered employees.	OGE's initial follow-up review found that 87% of public financial disclosure report filers received annual ethics training. The training confirmations OGE reviewed as part of its second follow-up review indicated that over 92% of confidential financial disclosure report filers received annual ethics training.	Closed
11	Ensure SGE financial disclosure reports are filed in a timely manner and properly maintained.	<p>OGE found that only four of the eight reports that were required to be filed by SGEs by February 15, 2018 were filed timely.</p> <p>One of the four reports not filed timely was filed on February 28, 2018. Another report was filed on May 4, 2018, after repeated reminders and requests from ethics officials. The remaining two reports had not been filed by the time OGE completed its second follow-up review. Ethics officials explained that they did not remind the two SGE's of their obligation to file reports. Ethics officials notified the two filers that they were required to file reports after OGE identified that the reports remained outstanding.</p> <p>This recommendation will remain open until DOI improves its process for ensuring SGEs file their reports as required.</p>	Open

I appreciate the courtesies extended to the OGE program review staff. OGE will conduct a third follow-up review to assess the status of the remaining open recommendations. 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', written in a cursive style.

Dale Christopher
Deputy Director for Compliance