



United States Office
Of Government Ethics

Report Number 08-008

Highlights

Model Practices

- OE has comprehensive written standard operating procedures.
- OE employs a tracking system for financial disclosure and ethics training that sends automated emails, tracks filing extensions, and generates destruction dates for records.
- OE has developed award-winning training materials.
- OE gives specialized, one-on-one training for senior officials.
- OE employs a searchable index of ethics counseling.
- OE requires quarterly status reports from ethics staff at components regarding their administration of component ethics programs.

OGE Recommends

- That OE reduce undue periods of inaction between contacting financial disclosure filers to resolve issues and certifying reports.
- That OE review and certify the six public financial disclosure reports filed in 2006 that OGE identified as being uncertified.

If you have comments or would like to discuss this report, please contact Dale Christopher, Associate Director for Program Reviews, at 202-482-9224 or dachrist@oge.gov.

Ethics Program Review U.S. Department of Agriculture Office of the Secretary

May 2008 Report

Executive Summary

The Office of Government Ethics (OGE) has completed its review of the ethics program at the U.S. Department of Agriculture's (USDA) Office of the Secretary (OSEC). The purpose of a review is to identify and report on the strengths and weaknesses of a program by evaluating: (1) agency compliance with ethics requirements found in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program. OGE determined that there is reasonable assurance that the performance and management of OSEC's ethics program is effective.

USDA's Office of Ethics (OE) is directly responsible for administering OSEC's ethics program. OGE's review identified several model practices that OE has implemented. The model practices include:

- comprehensive written standard operating procedures;
- a tracking system for financial disclosure and ethics training that sends automated emails, tracks filing extensions, and generates destruction dates for records;
- award-winning training materials;
- specialized, one-on-one training for senior officials;
- a searchable index of ethics counseling; and
- quarterly status reports from ethics staff at components regarding their administration of component ethics programs.

OGE's report makes two recommendations: (1) that OE reduce undue periods of inaction between contacting financial disclosure filers to resolve issues and certifying reports and (2) that OE review and certify the six public financial disclosure reports filed in 2006 that OGE identified as being uncertified.

This report has been forwarded to USDA's Designated Agency Ethics Official and USDA's Inspector General. OGE will follow-up with USDA's Designated Agency Ethics Official within six months from the date of this report's issuance on the status of OGE's recommendations.



**United States Office
Of Government Ethics**

Report Number 08-008

Ethics Program Review

**U.S. Department of Agriculture
Office of the Secretary**

May 2008 Report

Introduction

OGE MISSION

The U.S. Office of Government Ethics (OGE) provides leadership for the purpose of promoting an ethical workforce, preventing conflicts of interest, and supporting good governance initiatives.

PURPOSE OF A REVIEW

The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating: (1) agency compliance with ethics requirements found in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures in place for administering the program.

REVIEW AUTHORITY AND SCOPE

OGE has the authority to evaluate the effectiveness of executive agency ethics programs. *See* Title IV of the Ethics in Government Act of 1978, as amended (the Ethics in Government Act), and 5 CFR part 2638. OGE's review of the U.S. Department of Agriculture (USDA) focused on the elements listed below.

- Leadership involvement in the ethics program
- Program structure
- Financial disclosure systems
- Ethics education and training
- Ethics counseling
- Outside employment
- Enforcement of ethics laws and regulations
- Ethics agreements
- Travel payments from non-Federal sources

Ethics Program Review: USDA – OSEC

OGE's review of USDA focused on the ethics programs at four USDA components: the Office of the Secretary (OSEC), Rural Development (RD), Agricultural Research Service (ARS), and Food Safety and Inspection Service (FSIS).

This report details OGE's review of OSEC.¹ However, because USDA's Office of Ethics (OE) administers the public financial disclosure system for all four of the components reviewed by OGE, this report also summarizes public financial disclosure for all USDA components reviewed (OSEC, RD, ARS, FSIS). In addition, this report discusses pertinent issues addressed in prior OGE ethics program reviews of USDA.

PRIOR ETHICS PROGRAM REVIEW

OGE's 2002 review of USDA resulted in the issuance of a Notice of Deficiency. The 2002 Notice of Deficiency highlighted two areas of concern: (1) lack of adequate oversight of the ethics program by OE and (2) inadequate ethics staffing in the components due to high staff turnover, non-ethics duties taking precedence over ethics duties, and a lack of training for ethics advisors. OGE's report accompanying the 2002 Notice of Deficiency contained 17 recommendations. In 2004, OGE determined that USDA had successfully implemented OGE's 17 recommendations.

Program Elements

This report consists of descriptions, analyses, and conclusions regarding each program element reviewed.

LEADERSHIP

Commitment and action by agency leadership is the keystone for ensuring the integrity of an agency's ethical culture and for fostering public confidence in the decision-making processes of Government. On June 15, 2006 the Secretary of Agriculture underscored the importance of ethics at USDA by issuing a memorandum to the entire department reminding employees to maintain high ethical standards and to adhere to the Standards of Ethical Conduct for Employees of the Executive Branch (Standards). The Secretary of Agriculture also discussed his commitment to ethics in a meeting with the Director of OGE in November 2006.

PROGRAM STRUCTURE

Program Structure at the Time of Review

Overall direction and support for the USDA ethics program is provided by OE, with the Director of OE serving as the Alternate Designated Agency Ethics Official (ADAEO). OE directly administers the ethics program for OSEC. Additionally, OE administers the public financial disclosure program for all of USDA and the confidential financial disclosure program for Departmental Administration and some headquarters employees.

¹ Reports detailing OGE's review of RD, ARS, and FSIS will be issued separately.

Ethics Program Review: USDA – OSEC

From January 2006 to August 2007, USDA was without a Designated Agency Ethics Official (DAEO). OE officials stated that the lack of a DAEO during this period adversely affected the ability of OE to work with upper management and to gain the attention of the Secretary of Agriculture. According to USDA regulation 7 CFR § 2.87(a), the Deputy Assistant Secretary for Administration shall be designated as USDA's DAEO. According to USDA ethics officials, USDA is currently working to change the regulation so that the Director of OE would serve as the DAEO. Notwithstanding that the regulation has yet to be changed, the Director of OE, who was previously the ADAEO, was designated DAEO on August 9, 2007.²

At the time of OGE's current review, OE had five employees: the Director of OE, two Senior Ethics Specialists, an Ethics Specialist, and an Ethics Assistant. All of the aforementioned employees perform ethics duties full time.

According to OE Ethics Issuance 02-02, the DAEO delegates ethics responsibilities within each USDA component to a Deputy Ethics Official (DEO). The DEO has the same authority as the DAEO within his or her component except that the DEO does not have the authority to certify public financial disclosure reports.

The Under Secretary for each USDA component chooses the DEO. OE instructs Under Secretaries to appoint DEOs at the highest practical level, but normally not more than two echelons below the Under Secretary. Each DEO has the discretion to hire a Mission Area Ethics Advisor who is responsible for the day-to-day administration of the ethics program at his or her respective components, excluding the public financial disclosure system. According to the position description for a Mission Area Ethics Advisor, "The incumbent serves under the general supervision of the DEO, but exercises great independence in setting priorities, performing day-to-day duties, and exercising independent judgment in the resolution of sensitive ethics problems." In addition, the Mission Area Ethics Advisor is expected to consult with and advise OE staff on complex ethics matters and counseling, and to consult with the DEO concerning remedial action. The position description for Mission Area Ethics Advisors sets out a clear chain of command for dealing with ethics issues.

Program Structure in Relation to the 2002 Notice of Deficiency

One area of concern highlighted in the 2002 Notice of Deficiency was a lack of adequate oversight of the ethics program by OE. OGE's current examination of OE's oversight of USDA's ethics program revealed that OE has developed guidance on ethics program administration, has clearly delegated ethics responsibilities, has created a clear chain of command for dealing with ethics issues, and has created a requirement that component ethics offices file quarterly reports that notify OE of compliance with financial disclosure and training requirements. At the time of OGE's current review, OE lacked oversight of USDA's ethics program in at least one specific way. Namely, while OE has a goal of conducting reviews of two USDA component ethics programs a year,³ the Director of OE informed OGE that OE does not currently have sufficient staff or resources to achieve this goal.

² The position of ADAEO was filled soon after the Director of OE became the DAEO.

³ Review of component ethics programs is not required by law or regulation.

Ethics Program Review: USDA – OSEC

The other area of concern highlighted by the Notice of Deficiency issued in 2002 concerned inadequate ethics staffing in the components due to high staff turnover, non-ethics duties taking precedence over ethics duties, and a lack of training for ethics advisors. OGE's current review of the staffing at component ethics offices revealed that the component DEOs have considerable control over the hiring of ethics staff. According to OE, the competing priorities of the DEOs have led to vacancies being left open for longer periods of time than OE would prefer and a lack of consultation with OE on the filling of ethics staff vacancies. OE ethics officials also stated that the inability to pay experienced ethics officials at sufficient levels contributes to turnover at component ethics offices. Lack of authority on the part of OE and the DAEO can lead to a lack of consistency and a loss of continuity in the ethics program from one component to another and within components, especially during times of transition.

OGE's current review also revealed that OE has instituted a 10-hour per year training requirement for Mission Area Ethics Advisors and tracks completion of this requirement through quarterly reports filed with OE. However, this requirement does not extend to officials with part-time or collateral ethics duties in state, area, or district offices.

OGE's current review revealed that, at the components reviewed, the problem of non-ethics duties taking precedence over ethics duties has not resurfaced since the 2002 Notice of Deficiency. While some component ethics officials perform non-ethics functions, these ethics officials spend at least 50 percent of their time on ethics matters.

Ethics Program Restructuring

Prior to OGE's current review of USDA's ethics program, OE developed an initiative to restructure USDA's ethics program to address ongoing oversight and staffing challenges inherent in the current program structure.⁴ The proposed program structure places all component ethics offices under the direct supervision of OE. OE explained that the benefits of a single ethics office are: direct control over ethics program administration by the Director of OE, uniform procedures for hiring ethics officials, and uniform performance of ethics duties. For example, under the current structure, if a component ethics office has only one ethics official, no back-up exists and institutional knowledge is easily lost; this can lead to a situation where an ethics office is performing at a high level and then, due to staff turnover, has a period of years performing at a low level. OE also noted that, while the DAEO is responsible for the performance of the entire USDA ethics program, the position has limited authority over certain elements of the ethics program. OGE agrees with OE that a program structure where the DAEO does not have the authority to ensure appropriate staffing levels can lead to a lack of continuity in the ethics program. It is pertinent to note that, regardless of program structure, it is the responsibility of the Secretary of Agriculture to exercise personal leadership in maintaining USDA's ethics program. This includes making available to the ethics program sufficient staff to allow USDA to administer its ethics program in an effective manner. *See* 5 CFR § 2638.202(a).

⁴ OE also plans to provide ethics counseling that is more consistent to USDA's five science offices by creating a science ethics office.

Ethics Program Review: USDA – OSEC

FINANCIAL DISCLOSURE SYSTEMS

Title I of the Ethics in Government Act requires that agencies ensure confidence in the integrity of the Federal Government by demonstrating that officials are able to carry out their duties without compromising the public trust. High-level Federal officials demonstrate that they are able to carry out their duties without compromising the public trust by disclosing publicly their personal financial interests (SF 278). Title I also authorizes OGE to establish a confidential financial disclosure system for less senior executive branch personnel in certain designated positions to facilitate internal agency conflict of interest review (OGE Form 450).

Financial disclosure serves to prevent conflicts of interest and to identify potential conflicts by providing for a systematic review of the financial interests of both current and prospective officers and employees. The financial disclosure reports also assist agencies in administering their ethics programs in providing counseling to employees. *See* 5 CFR § 2634.104(b).

OE collects, reviews, and certifies all public financial disclosure reports for USDA. OE is also responsible for collecting, reviewing, and certifying confidential financial disclosure reports filed within OSEC; however, there were no confidential filers in OSEC at the time of OGE's review.⁵

Public Financial Disclosure System (SF 278)

OGE's examination of the public financial disclosure system at USDA found that comprehensive written procedures are in place and that OE uses a computer program called Ethos that sends automated emails, tracks filing extensions, and generates destruction dates for records. Comprehensive written procedures and an effective financial disclosure tracking system contribute to a public financial disclosure system that is well managed. However, the timeliness for certification of public reports can be improved with more frequent follow-up with filers, as noted below.

To evaluate the filing, review, and certification of public reports at USDA, OGE examined 149 out of the 278 public reports required to be filed in 2006 at the USDA components under review by OGE (OSEC, RD, ARS, and FSIS). The 149 reports consisted of:

Type of Report

- 123 incumbent reports
- 9 new entrant reports
- 16 termination reports
- 1 combination incumbent/termination report

149 total

⁵Confidential financial disclosure systems for RD, ARS, and FSIS are administered by their respective Mission Area Ethics Advisors. Separate reports for RD, ARS, and FSIS will detail OGE's examination of their respective confidential financial disclosure systems.

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Filing Timeliness

- 139 reports were filed timely.
- 9 reports had extensions.
- 1 report was late but the DAEO waived the \$200 filing fee.

149 total

Review Timeliness

- 139 reports were reviewed in a timely manner.
- 10 reports were reviewed 60 or more days after the date of filing.

149 total

Certification Timeliness

- 1 report was certified late.⁶
- 6 reports were not certified by the end of OGE's field-work.
- 128 reports were certified in a timely manner.
- 14 reports were certified 7 to 15 months after being filed. In many cases OGE documented that ethics officials were seeking further information from filers in accordance with 5 CFR § 2634.605(a), which allows for final certification of reports to occur later than 60 days after the date of filing where additional information is being sought or remedial action is being taken. However, often no action was taken to seek more information or to reconcile a problem for months between conducting the initial review of the report, contacting the filer, and certifying of the report.

149 total

Quality of Review

Written comments on reports, documentation in files, and conversations with ethics officials indicated that the financial disclosure reports underwent a thorough review by OE officials.

ETHICS EDUCATION AND TRAINING

An ethics education and training program is essential to raising awareness among employees about ethics laws and rules and informing them that an agency ethics official is available to provide ethics counseling. Each agency's ethics training program must include at

⁶ In addition, 2 reports filed in 2004 and 3 reports filed in 2005 were certified from 1 to 2 years after being filed.

Ethics Program Review: USDA – OSEC

least an initial ethics orientation for all employees and annual ethics training for covered employees.

USDA offers a variety of education and training opportunities for its employees including instructor-led presentations, Web modules,⁷ and written materials. Ethics training is tracked using a computer program called Ethos. Ethos combines information from the National Finance Center, Agriculture Learning (AgLearn) Service,⁸ and ethics training sign-in sheets so that all ethics training can be tracked efficiently and effectively.

USDA was a recipient of an OGE 2007 Training Award for successfully meeting the challenge of developing creative, innovative educational programs and tools. Specifically, the 2007 Training Award recognized *Ethics Sweepstakes*, an online virtual horse race in which participants select ethics questions of varying degrees of difficulty, and for several self-help tools that allow employees to identify possible ethics problems.

In calendar year 2005, all of the 21 OSEC employees required to receive annual ethics training did so.

Initial Ethics Orientation

Within 90 days from the time an employee begins work for an agency, the agency must provide the employee with initial ethics orientation. Initial ethics orientation must include:

- the Standards;
- any agency supplemental standards;
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials; and
- at least one hour of official duty time to review the items described above. See 5 CFR § 2638.703.

To meet the initial ethics orientation requirement, within 90 days from the time an employee begins work at USDA, the employee is provided with:

- a Web module titled *New Employee Orientation*;
- an introductory pamphlet titled *Ethics at a Glance*;
- the Standards (Including the Principles of Ethical Conduct, 5 CFR § 2635.101); and
- the Supplemental Standards of Ethical Conduct for Employees of the Department of Agriculture.

⁷ USDA has determined that three Web modules meet the one-hour requirement for initial ethics orientation and annual ethics training.

⁸ AgLearn provides educational services for USDA Federal employees, contractors, partners, and customers.

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In addition, OE gives a weekly presentation to all new employees in headquarters offices. A separate, tailored presentation is given to new headquarters senior staff, while very high level staff is given one-on-one initial ethics orientation.

Annual Ethics Training

Public financial disclosure filers are required to receive verbal annual ethics training each year. *See* 5 CFR § 2638.704(a). Verbal training includes training prepared by a qualified instructor and presented by telecommunications, computer, audiotape, or videotape. *See* 5 CFR § 2638.704(c)(2). Other covered employees (e.g., confidential filers) are required to receive verbal annual ethics training at least once every three years and may receive written annual training in the intervening years. *See* 5 CFR § 2638.705(c). The content requirements for both public filers and other covered employees are the same. Agencies are encouraged to vary the content of annual training from year to year but the training must include, at least, a review of:

- the 14 Principles of Ethical Conduct;
- the Standards;
- any agency supplemental standards;
- the Federal conflict of interest statutes; and
- the names, titles, office addresses, and phone numbers of the DAEO and other ethics officials. *See* 5 CFR § 2638.704(b).

OGE reviewed the following USDA ethics training courses:

- 17 Web modules, including *Ethics Sweepstakes*;
- slides of the instructor-led course titled *Seeking Non-Federal Employment*; and
- slides of the instructor-led course titled *USDA Ethics Overview*.

OGE's review of these courses found them to meet the annual ethics training content requirements. Indeed, as previously mentioned, USDA received an OGE 2007 Training Award for its Web module *Ethics Sweepstakes*.

ETHICS COUNSELING

The DAEO is required to ensure that a counseling program for agency employees concerning ethics and standards of conduct matters, including post-employment matters, is developed and conducted. *See* 5 CFR § 2638.203. The DAEO may delegate to one or more deputy ethics officials the responsibility for developing and conducting the counseling program. *See* 5 CFR § 2638.204.

OGE's assessment of an ethics counseling program focuses on five factors: (1) accuracy, (2) timeliness, (3) transparency, (4) accountability, and (5) consistency. To determine whether an agency's counseling program successfully addresses these factors, OGE reviews and assesses the program's processes and written procedures. Further, OGE reviews selected samples of counseling to assess whether processes and written procedures are effective.

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Within OSEC, ethics-related counseling is provided to employees both verbally and in writing by the Ethics Specialists and the Director of OE. OE closely coordinates the issuance of ethics counseling with the USDA Office of General Counsel (OGC) due to OGC's role as the authority on all laws and regulations that affect USDA and its employees. Ethics counseling administered in written form is memorialized using a computer program called ETHVICE on a case-by-case basis at the discretion of the Ethics Specialist or Director of OE. By memorializing questions and OE responses to questions, ETHVICE allows OE to render counseling that is consistent and transparent.

In addition to ETHVICE, OE employs a policy called "entire office rule" to promote counseling that is consistent and accurate. The "entire office rule" allows each Ethics Specialist to weigh-in on each piece of counseling. Because of this policy, counseling has the possibility to be reviewed by each Ethics Specialist on staff.

Fact-specific guidance that presents either novel conclusions or that sets out an analysis that will be helpful to ethics advisors at USDA's components is set out in what OE calls Ethics Advisories. These Ethics Advisories are available on an intranet solely accessible by ethics officials within USDA and are intended to ensure the consistency and accuracy of ethics counseling.

In addition to counseling generated in response to a question from an employee, OE generates detailed guidance tailored for specific segments of the USDA employee population or to address a common concern within USDA. OE calls this guidance an Ethics Issuance. Ethics Issuances are available to the public on USDA's ethics Web site. Making Ethics Issuances available to the public adds transparency to OE's ethics counseling and creates counseling that can be accessed in a timely manner by USDA employees.

To evaluate the counseling provided by OE to employees at OSEC, OGE analyzed samples of memorialized ethics counseling. These samples were reviewed by OGE's USDA Desk Officer. The Desk Officer has discussed her analysis with OE ethics officials; her chief concern dealt with the technical accuracy of some samples. These concerns do not rise to the level that would require OGE to make a recommendation for improvement.

OUTSIDE EMPLOYMENT

Prior approval to engage in certain types of outside employment is required for all USDA public and confidential financial disclosure filers, except special Government employees. *See* 5 CFR § 8301.102. USDA uses a form titled Application for Approval to Engage in Non-Federal Employment for the approval process. To analyze whether public filers at OSEC, ARS, FSIS, and RD were receiving prior approval before engaging in outside employment, OGE examined Schedule D, Part I of public financial reports and cross checked the outside employments listed there with the Applications for Approval to Engage in Non-Federal Employment included in the report filer's file. OGE's examination showed that employees were receiving prior approval, when appropriate, before engaging in outside employment in compliance with 5 CFR § 8301.102.

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ENFORCEMENT

The DAEO is required to ensure that (1) information developed by internal audit and review staff, the Office of the Inspector General, or other audit groups is reviewed to determine whether such information discloses a need for revising agency standards of conduct or for taking prompt corrective action to remedy actual or potential conflict of interest situations and (2) the services of the agency's Office of the Inspector General are utilized when appropriate, including the referral of matters to and acceptance of matters from that Office. *See* 5 CFR § 2638.203(b)(11) and (12).

Ethics officials at USDA are meeting the requirements of 5 CFR § 2638.203(b)(11) and (12) by coordinating with USDA's Office of Inspector General (USDA-IG) on ethics-related matters. USDA-IG officials stated that their working relationship with OE was very good. Further, USDA-IG and OE have a process for notifying OGE of referrals made to the Department of Justice.

Employee Relations, not USDA-IG, handles cases of possible violations of the Standards and orders administrative action if necessary. In addition, if USDA-IG declines to investigate an alleged criminal violation, it refers the matter to Employee Relations for possible action.

ETHICS AGREEMENTS

If potential or actual conflicts of interest exist, public and confidential financial disclosure filers may be required to enter into ethics agreements. Generally, employees entering into ethics agreements are required to comply with those agreements within three months of the agreement or of Senate confirmation, if applicable. *See* subpart H of 5 CFR part 2634.

Fourteen USDA Presidentially-appointed, Senate-confirmed employees entered into written ethics agreements from 2004 to 2006. OGE found that necessary actions had been taken to timely comply with 11 of the 14 ethics agreements. Three ethics agreements were complied with after the applicable deadlines had passed. Evidence of the actions was on file for all 14 ethics agreements.

ACCEPTANCE OF TRAVEL PAYMENTS FROM NON-FEDERAL SOURCES

An employee may accept payment of travel expenses from non-Federal sources on behalf of the employee's agency for official travel to a meeting or similar function when specifically authorized to do so by the agency. Agencies must submit semiannual reports of travel payments from non-Federal sources in excess of \$250 to OGE. *See* 31 U.S.C. § 1353.

USDA accepts travel payments from non-Federal sources for travel, subsistence, and related expenses incurred by agency employees on official travel for attendance at meetings or similar function under authority of 31 U.S.C. § 1353. The procedures for requesting and receiving authorization for acceptance of travel payments from a non-Federal source are detailed in USDA Ethics Issuance 99-2. Ethics Issuance 99-2 delegates to each DEO the responsibility to determine whether it is appropriate to approve the acceptance of an offer from a non-Federal

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source to finance the travel expenses of an employee within the DEO's organization. USDA requires employees wishing to travel under the authority of 31 U.S.C. § 1353 to fill out a form titled Approval and Report of Travel Funds Received from Non-Federal Sources (Form AD-1101). The second page of Form AD-1101 contains a conflict of interest analysis section to be completed by a Mission Area Ethics Advisor. Each Mission Area Ethics Advisor is delegated responsibility to conduct the conflict of interest analysis and to recommend to the DEO either acceptance or non-acceptance of the payment from the non-Federal source.

Mission Area Ethics Advisors forward the completed Forms AD-1101 to OE and OE subsequently uses this information to fill out the required semiannual reports. USDA filed the six required semiannual reports for the period covering March 2005 through September 2007 with OGE.

Summary

OGE's review determined that there is reasonable assurance that the performance and management of OSEC's ethics program is effective. OE is taking steps to restructure USDA's ethics program to address oversight and staffing challenges that OGE identified at the time of its review. OGE will continue to monitor the progress of the restructuring of the USDA ethics program during its six-month follow-up review.

OGE's review identified several model practices that OE has implemented. The model practices include:

- comprehensive written standard operating procedures;
- a tracking system for financial disclosure and ethics training that sends automated emails, tracks filing extensions, and generates destruction dates for records;
- award-winning training materials;
- specialized, one-on-one training for senior officials;
- a searchable index of ethics counseling; and
- quarterly status reports from ethics staff at components regarding their administration of component ethics programs.

Recommendations

To enhance the USDA ethics program, OGE recommends that OE:

1. Reduce undue periods of inaction between contacting financial disclosure filers to resolve issues and certifying reports.
2. Review and certify the six public financial disclosure reports filed in 2006 that OGE identified as being uncertified.

USDA's DAEO is to advise OGE within 60 days of the specific actions OE has taken or plans to take to address OGE's recommendations. OGE stands ready to assist OE in implementing these recommendations, as well as other program initiatives that USDA may

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choose to undertake. OGE will follow-up with USDA's DAEO within six months from the date of this report's issuance on the status of OGE's recommendations.

If you have comments or would like to discuss this report, please contact Dale Christopher, Associate Director for Program Reviews, at 202-482-9224.