

United States Office of Government Ethics

Compliance Division

Ethics Program Review

Transportation Security Administration

Results in Brief

The United States Office of Government Ethics (OGE) conducted a review of the Transportation Security Administration (TSA) ethics program in May 2013. The results of the review indicated that TSA has taken necessary steps to ensure that its ethics program is effectively administered and in compliance with applicable laws, regulations, and policies.

Highlights

- TSA conducted a self-assessment of its ethics program.
- TSA has implemented changes that have strengthened the ethics program’s internal controls.
- The ethics office provides discretionary training throughout the year to different audiences. Training content is designed to address the issues most relevant to each audience.

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Objectives, Scope, and Methodology

OGE provides leadership for the purpose of promoting an ethical workforce, preventing conflicts of interest, and supporting good governance. 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 as set forth in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program. OGE has authority to evaluate the effectiveness of executive agency ethics programs pursuant to Title IV of the Ethics in Government Act and 5 CFR part 2638.

OGE limited the scope of its review to the TSA Headquarters ethics program. To assess the ethics program, OGE examined a variety of documents that were provided by agency ethics officials. These included: the annual ethics program questionnaire; public and confidential financial disclosure reports that were required to be filed in 2012; and, advice and counseling provided to TSA employees. Other documents that TSA forwarded to OGE were also examined.

In addition, members of OGE's Program Review Branch met with the TSA's ethics officials to obtain additional information about the strengths and weaknesses of TSA's ethics program, clarify certain matters, and verify the accuracy and origin of data collected.

Agency Background

TSA became part of the U.S. Department of Homeland Security (DHS) in March 2003. It was one of the 22 different Federal departments and agencies combined into a unified, integrated Department in accordance with the Homeland Security Act.

TSA secures the nation's airports and other transportation systems. TSA's workforce is comprised of security officers, inspectors, air marshals and managers who protect the nation's transportation systems by screening for explosives at checkpoints in airports, inspecting rail cars, patrolling transit systems with law enforcement partners, and working to make all modes of transportation secure. TSA had 65,411 employees as of December 31, 2012.

Program Administration

Because TSA is a DHS component, its ethics program operates under the authority of the DHS Designated Agency Ethics Official (DAEO). DHS' Principal Deputy General Counsel serves as the DAEO. The Associate General Counsel serves as the Alternate DAEO. The DAEO has delegated to Chief Counsels and senior attorneys at the various DHS components the authority to manage and coordinate their respective ethics programs. The Chief Counsels serve as Chief Deputy Ethics Officials (CDEO) and can further delegate ethics duties to their staffs.

TSA's ethics office is organizationally located within the Office of Chief Counsel (OCC), General Law Division at TSA headquarters. OCC advises on all legal matters relating to the protection of the nation's transportation systems. The Chief Counsel serves as the CDEO. The Deputy Chief Counsel for General Law supervises the ethics office. The Assistant Chief Counsel for Ethics and General Legal Services (Assistant Chief Counsel) manages the day-to-day operations of the ethics office. The Assistant Chief Counsel was appointed in June 2012. (Previously, the Assistant Chief Counsel had served as an ethics attorney in the ethics office.)

The Assistant Chief Counsel is assisted by three ethics counselors and a management analyst who serve as full-time ethics officials and a staff assistant who performs ethics duties on a part-time basis. Additionally, 66 field ethics counselors assist the Assistant Chief Counsel within TSA headquarters and the field offices in the nation's airports on a part-time basis.

The ethics office is responsible for administering the ethics program at headquarters, including the review of all TSA public financial disclosure reports filed by non-Presidentially Appointed and Senate-confirmed (PAS) employees and providing oversight of the agency-wide ethics program. Field ethics counselors administer the ethics program outside of headquarters. Specifically, field ethics counselors: administer confidential financial disclosure requirements within their respective jurisdictions; render ethics advice to employees concerning the Standards of

Conduct; prepare ethics training materials and provide ethics training. Field ethics counselors also coordinate and work with Office of Inspection (OI) officials, administrative officials and supervisors and managers to ensure compliance with relevant requirements.

Independent Auditor's Audit

OGE encourages agencies to use self-assessment as a tool to evaluate their ethics programs. Self-assessments help ethics officials improve the efficiency of their programs by identifying areas of concern. Each year an outside private public accounting firm, under contract with the DHS Office of Inspector General (OIG), performs an integrated audit of DHS's financial statements and internal control over financial reporting.

In June 2012 the private accounting firm audited TSA's ethics program to assess whether internal controls were effective in ensuring that financial disclosure reports were timely filed and properly reviewed and certified. The firm examined the ethics office's procedural guidance regarding financial disclosure reporting and samples of financial disclosure reports. The accounting firm determined that the ethics program lacked controls to ensure compliance with the ethics program requirements.

Ethics officials had conducted their own assessment of the ethics program in February 2012. As part of their assessment ethics officials reviewed public financial disclosure reports from the previous four years. Ethics officials identified problems in the financial disclosure program. For example, ethics officials found that some public reports were not certified and certified reports included errors. One of the most serious findings was that the staff attorney in the ethics office who was primarily responsible for the financial disclosure program had backdated the certification of public reports required to be filed in 2011. These backdated OGE 278 forms were among the public reports provided to the outside private accounting firm in connection with the FY 2011 financial audit. Consequently, OCC relieved the staff attorney of his ethics duties. (The staff attorney later resigned.) Additionally, all the ethics program findings were reported to the outside accounting firm and DHS' and TSA's management. OCC also referred the issue of the backdated public reports to the OIG, who referred the matter to TSA's OI. OI investigated these allegations and has since closed the case. Based on the results of the ethics office assessment of the program, appropriate controls were developed and began to be implemented.

OCC's management has worked diligently to remediate the deficiencies identified by ethics officials in 2012 and the FY 2012 audit. For example, management made changes in the ethics staffing, such as the addition of new staff and the appointment of an ethics attorney as the Assistant Chief Counsel. These changes are discussed in greater detail in the Financial Disclosure section of this report.

OGE believes that the changes that TSA has implemented have strengthened the internal controls necessary for the effective and efficient administration of its ethics program.

Model Practice

OGE identifies model practices and shares them when it appears they may benefit an agency's ethics program. The following is a model practice OGE noted TSA implemented to enhance its ethics program:

- TSA conducted a self-assessment of its ethics program.

Financial Disclosure

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 this by disclosing publicly their personal financial interests by completing OGE Form 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 implements this authority by requiring the covered executive branch personnel to complete 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 assist agencies in administering their ethics programs and in providing counseling to employees. *See* 5 C.F.R. § 2634.104(b).

OGE believes that the ethics office is undertaking efforts to implement a financial disclosure program that will meet applicable requirements. Because of the actions taken by TSA to address the timely identification of filers, and the submission, review and certification of reports, OGE is not making any formal recommendations in this area. OGE encourages TSA to continue to strengthen its financial disclosure program.

Written Procedures for the Financial Disclosure Program

Section 402(d)(1) of the Ethics in Government Act of 1978 requires that executive branch agencies establish written procedures for collecting, reviewing, evaluating, and where applicable, making publicly available, financial disclosure reports filed by the agency's officers and employers.¹ OGE found that TSA has developed comprehensive internal written procedures for the administration of its financial disclosure program which meet all applicable requirements. However, the DAEO issued a Memorandum in April 2013 delineating the new policy for financial disclosure procedures within DHS. TSA ethics officials are preparing to incorporate the changes into the TSA written procedures.

¹ See, OGE's DAEOGRAM 09-03-92: Developing written procedures for the public and confidential financial disclosure systems.

Public Financial Disclosure

In 2012, the ethics office was responsible for the review and certification of 106 annual, 27 new entrant and 25 termination public reports. OGE examined 40² of these reports and determined that most were timely submitted, reviewed and certified. OGE also noted that these reports were reviewed for conflicts by ethics officials, as evidenced by reviewer annotations during follow-up with some filers. However, OGE found that 16 reports were certified late.

OGE notes that, during the 2012 public financial disclosure season, TSA ethics officials were working diligently to address the findings from the independent audit while concurrently reviewing and certifying the public reports required to be filed in 2012. The ethics office also underwent a significant staff transition, as the primary manager of the public financial disclosure system was relieved of his ethics duties. The remaining ethics officials often had to reconstruct the financial disclosure files and contact filers about public reports from previous years in order to address the backlog of uncertified reports. Additionally, ethics officials were working to implement the provisions of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act). TSA public filers and ethics officials were also required to use the Army's Financial Disclosure Management e-filing System (FDM), to file, review and certify public reports for the first time in 2012. This required training the filers to use FDM. Ethics officials also had to learn how to review and certify public reports electronically.

Ethics officials explained that as a result of their own examination of the ethics program and the subsequent independent audit conducted in 2012, the ethics office had already implemented measures to address the late certification of public reports. OGE believes that the changes implemented by TSA, described later in this section, are likely to remedy the current deficiencies in timeliness of review and certification of financial disclosure reports.

Confidential Financial Disclosure

In 2012, the ethics office was responsible for the review and certification of 718 confidential reports. OGE examined 91³ of these reports and determined that most of them were timely reviewed and certified. OGE also noted that these reports were reviewed for conflicts by ethics officials, as evidenced by reviewer annotations made during follow-ups with some filers. However, OGE found that 38 reports were filed late. Furthermore, OGE noticed that 15 out of 23 new entrant reports were among those filed late. The reports were late because the filers were not timely identified and notified of their obligation to file reports. This is a significant deficiency. It is important that potential conflicts of interest are identified early to ensure that they are timely remediated. Ethics officials explained that, as a result of the findings of the independent audit, actions have been taken to address the timely identification of new entrant confidential filers.

Financial Disclosure Program Changes Resulting from the Independent Audit

Ethics officials explained that the independent audit conducted in FY 2012 revealed that TSA was not fully complying with requirements related to the timely filing, review and certification

² OGE examined 10 new entrant reports 20 annual reports and 10 termination reports.

³ OGE examined 23 new entrant reports and 68 annual reports.

of financial disclosure reports. The ethics office began to implement changes during 2012 to address many of the concerns that the independent auditor identified. in the review and certification process of public and confidential reports and the identification of confidential filers. The following actions were taken by the ethics office:

- Added staff on a temporary basis in 2012 to: 1) address the backlog of uncertified 2011 public reports, and certify the 2012 annual public reports; and 2) to meet the STOCK Act public posting deadline of August 31, 2012- The ethics office enlisted the assistance of the Assistant Chief Counsel for Information Law, a former OCC Ethics Counsel (now working for the Office of Procurement Law) and OCC Field Counsel who were trained and delegated authority to review and certify public reports. In addition, OCC Field Counsel were detailed to TSA headquarters for 10 days and dedicated to review public reports.
- Delegated authority to the management analyst/paralegal to review and certify the confidential reports and to provide initial review of the public reports. The management analyst also manages the confidential financial disclosure program, including serving as liaison to the TSA field offices.
- Updated, the OCC Ethics Ishare page to include a description of the STOCK Act requirements and a variety of related resources such as, links to frequently asked questions, the OGE 278T form and instructions, OGE instructional videos, links to the FDM System and an FDM filing “Quick Start Guide,” and the OGE 450 and instructions. Ethics officials expect these actions will make financial disclosure information and reports easily and centrally accessible to all TSA employees.

The ethics office continues to exercise internal controls to:

- Track the progress of review and certification of new entrant, incumbent and termination public and confidential reports through completion of status reports, and during weekly status meetings with the Deputy Chief Counsel for General Law and the Principal Deputy Chief Counsel. - The management analyst/paralegal maintains confidential reports, public reports and transaction reports as well as tracking spreadsheets which include all information pertaining to the employee’s filing status, original due dates and extension dates, dates of receipt of financial disclosure forms, the dates of initial and final reviews and the names of reviewing officials. The management analyst creates periodic reports indicating filers to whom extensions have been granted, impending due dates, and files not yet reviewed by dates of submission.
- Acquire reports and information from Office of Human Capital (OHC) notifying the ethics office when new employees come on board. This helps with the identification as financial disclosure filers. The management analyst obtains the following employee reports from OHC: 1) Promotions, 2) Re-assignments, 3) Change to lower grade, 4) Separation. The management analyst also works with

DHS Financial Disclosure Management System IT POC to ensure that new entrant public filers are provided access to FDM to complete their financial disclosure reports.

- Control and safeguard of 278 and 450 files. To maintain better control of the files, the ethics office moved all 278 and 450 files to one location and has initiated the use of a “sign-out card” system for tracking custody of financial disclosure file folders. OCC moved the management analyst from an open cubicle to the office with the 278 files to further augment control of the files.

Education & Training

OGE found TSA’s education and training program to exceed the minimum training requirements found at subpart G of 5 C.F.R. 2638. Ethics officials have committed to providing in-person initial ethics orientation (IEO) to new employees. OGE also found TSA was satisfying the requirements at 5 C.F.R. § 2638.706 by documenting annually its ethics training plan.

Initial Ethics Orientation

Agencies must provide new employees an IEO that includes the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards), any agency supplemental standards, contact information for the agency’s ethics officials, and one hour to review the materials. This training must be provided within 90 days from the time an employee begins working for an agency. *See* 5 C.F.R. § 2638.703.

OGE found that the content of TSA’s IEO exceeds the minimal training requirements. However, the ethics office has challenges tracking and recording the completion of IEO.

IEO is completed at TSA headquarters in two parts:

- The first part is a live presentation during the New Employee Orientation provided by OHC every two weeks. An ethics counselor introduces employees to OCC’s structure and mission and to the ethics office. The ethics counselor also discusses the federal criminal conflict of interest laws, and the Standards.
- The second part of IEO is completed when new employees review the TSA *Guide to Major Ethics Rules* as part of the OHC online e-Orientation system for all new TSA employees. TSA’s *Guide to Major Ethics Rules*, is a comprehensive 14-page guide to the Standards of Conduct and Conflict of Interest Statutes and contact information for the ethics office, which satisfies the basic requirements of 5 C.F.R. § 2638.703. The OHC provides new employees with a link and temporary password to access the online e-Orientation system. In the event that the e-Orientation system is inaccessible, the *Guide to Major Ethics Rules* is provided during the live presentation.

Ethics officials explained that while the OHC provides the *Guide to Major Ethics Rules* as part of the e-Orientation to all TSA new hires, and OHC tracks new hires, there is currently no tracking system in place to track when an employee has completed their review of the *Guide to Major Ethics Rules*. Furthermore, ethics officials explained that during discussions with OHC officials regarding tracking completion of the *Guide to Major Ethics Rules*, OHC suggested that because of the large volume of new hires, the tracking of this element of e-Orientation would need to be done outside of the e-Orientation system.

However, according to an OHC program analyst who is responsible for e-Orientation of new employees, all new employees are required to attend the New Employee Orientation program, which includes the OCC presentation at TSA headquarters. The program analyst also explained that prior to reporting for duty, all new hires are required to complete computer based training and new-hire paperwork within the e-Orientation system. New employees must review documents including the *Guide to Major Ethics Rules* as part of this training. Employees are not able to electronically sign required forms until all the computer based training is completed. Additionally, according to the program analyst, the system allows for administrators to check that all training and forms have been completed prior to employees' on-boarding. Any employee who is unable to review the *Guide to Major Ethics Rules* within the e-Orientation system is reported to the ethics office. For any employee who has not reviewed the *Guide to Major Ethics Rules* within the e-Orientation system, the ethics office provides the new hire with a copy of the *Guide to Major Ethics Rules* for their review during the in-person orientation. Therefore, OGE has reasonable assurance that all new headquarters employees attend the in-processing sessions and receive in-person IEO and the required materials.

Annual Training in 2012

Executive agencies are required by 5 C.F.R. § 2638.704 and 5 C.F.R. § 2638.705 to provide covered employees with annual ethics training. The training must include a review of the Principles, the Standards, any agency supplemental standards, the Federal conflict of interest statutes, and the names, titles, office address, and telephone numbers of the DAEO and other agency ethics officials available to advise the employee of ethics issues. Annual ethics training is a vital component of an agency's ethics program and is intended to assist employees in carrying out their official responsibilities in a manner consistent with ethics-related statutes and regulations. Additionally, annual training helps to prevent violations and maintain the public's confidence that Government officials act impartially and free of conflicts of interest.

OGE found that the content of TSA's annual training was in accordance with regulations found at subpart G of 5 C.F.R. § 2638. In 2012, annual ethics training was provided to covered employees in one of two ways: in-person presentations and employee self-paced online modules. The in-person presentation provided to public filers covered the Standards, the criminal conflict of interest statutes, the STOCK Act, and the public financial disclosure requirements. Employees were also provided contact information for ethics officials. Ethics officials provided three in-person training sessions in 2012.

Covered employees who took online training could choose one of four online training courses to satisfy the annual training requirements: 1) Ethicsburg, 2) Foundations of Leadership-Introduction to Federal Ethics, 3) Ethics and Procurement Integrity for the Acquisition

Workforce and 4) Defense Acquisition University: Overview of Acquisition Ethics. Upon completion of online ethics training, in 2012 covered employees were required to send a copy of the Certificate of Training Completion or an email to the management analyst. The management analyst used these certificates to keep track of training in the same spreadsheets used to track financial disclosure reviews.

Ethics officials also provided discretionary ethics training, throughout the year to help raise employees' awareness of ethics laws and regulations. Ethics training was provided to different audiences in town hall style meetings. For example, ethics counselors provided specialized ethics training to supervisors, security technology personnel, procurement and acquisition staff and Federal Security Directors. The training each group received was designed to address issues they were most likely to encounter.

Model Practice

- The ethics office provides discretionary training throughout the year to supplement required training and emphasize specific ethics rules and requirements to most relevant to different audiences within TSA.

Advice and Counsel

The DAEO is required to ensure that a counseling program for agency employees that covers all ethics and standards of conduct matters, including post-employment matters, is developed and conducted. See 5 C.F.R. § 2638.203(b)(7).

OGE found TSA's ethics counseling and advice services to meet the requirements of 5 C.F.R. § 2638.203(b)(7). OGE also found that records are kept, where appropriate, on advice rendered as required by 5 C.F.R. § 2638.203(b)(8). Employees are encouraged to contact ethics officials via various forms of communication, including e-mail, telephone, and in-person. The Assistant Chief Counsel and the ethics attorneys are primarily responsible for rendering ethics advice to TSA employees. All advice and counseling examined during the review appeared to be appropriate and was provided in a timely manner.

TSA needs to ensure that employees receiving advice and counseling understand that disclosures made to an ethics official are not protected by attorney-client privilege. During the review, OGE noted that some of the advice provided to employees by email included the statement: "attorney-client privileged." OGE expressed concern that the statement may cause an employee seeking ethics advice to erroneously believe that such a relationship exists between him or her and the Government attorney who is serving as an ethics official. Disclosures made by an individual to an ethics official are not protected by an attorney-client privilege. Ethics officials are required by 28 U.S.C. § 535 to report any information they receive relating to a violation of the criminal code, Title 18 of the U.S. Code.⁴ Subsequently, ethics officials modified the language to clarify

⁴See Standards of Ethical Conduct for Employees of the Executive Branch Final Regulation issued by the U.S. Office of Government Ethics Codified in 5 C.F.R. Part 2635 As amended at 76 FR 38547 (July 1, 2011).

that there is no attorney-client relationship between ethics counselors and employees receiving ethics advice.

Agency Specific Ethics Rules

As a DHS component, TSA will be affected by any supplemental standard of ethical conduct regulations established by DHS. On October 12, 2011, DHS, with the concurrence of OGE, published in the Federal Register a proposed supplemental standards of ethical conduct regulation for its employees. The proposed rule will replace existing legacy supplemental ethics regulations of those previously existing component agencies that were incorporated into DHS and who have continued to apply the legacy regulations to employees whose duties and organizational structure have remained largely unchanged after their incorporation into DHS. Two significant areas to be addressed by the proposed DHS supplemental regulation will be to require prior approval for outside employment and the prohibition on the purchase of Government-owned, seized, or forfeited property by DHS employees.

OGE notes that by the time of its on-site examination, in May 2013, a final rule had not been published.

Enforcement

OGE was advised that the OIG is responsible for referring potential violations of the criminal conflict of interest statutes to DOJ and for concurrently notifying OGE of the referral. After OGE met with the DHS Counsel to the Inspector General (IG) and members of the IG's staff, as part of an OGE program review conducted at DHS Headquarters in 2012, OIG began to send the required notifications of referrals to OGE. OIG officials also agreed to notify the DHS' DAEO and Chief Counsels concurrently whenever a referral is made.

TSA's OI reports to the Deputy Administrator. One of OI's functions is to conduct investigations of employee misconduct and program fraud. As such, OI investigates alleged ethics violations after cases are referred to and declined by the OIG. Ethics officials assist the OI in understanding the ethics laws and regulations when investigating allegations of ethical violations.

In 2012, TSA did not make any referrals to the OIG of potential violations of the criminal conflicts of interest statutes. However, TSA officials took 45 disciplinary actions based wholly or in part upon violations of the standards of conduct provisions (5 CFR part 2635) in 2012.

1353 Travel Acceptances

Federal agencies may accept payments from non-Federal sources for travel, subsistence, and related expenses incurred on official travel under the authority of the General Services Administration regulation at 41 CFR chapter 304, implementing 31 U.S.C. § 1353. Semiannual

reports of payments accepted under 31 U.S.C. § 1353 must be submitted to OGE by May 31 and November 30 of each year.

TSA allows its employees to accept these payments, and has written procedures delineating the agency's policy. According to TSA's procedures, employees must complete TSA Form 1004, *Request to Accept Payment of Travel Expenses from an Non-Federal Source* and provide supporting documentation to the ethics office. An ethics counselor is responsible for conducting a conflict-of-interest review prior to the request being forwarded to the Office of Financial Management (OFM).

OFM is responsible for forwarding semiannual reports to DHS which are then forwarded to OGE. OGE examined DHS's last two reports (which incorporated TSA's reports) covering the periods from October 1, 2011 through March 31, 2012 and April 1, 2012 through September 30, 2012. OGE identified 2 and 3 payments had been accepted, respectively. OGE determined that both reports had been submitted to OGE in a timely manner.

Agency Comments

We appreciate the thorough and thoughtful review by the U.S. Office of Government Ethics of TSA's ethics program. TSA engages in ongoing review and self-assessment of its ethics program throughout the year to identify and resolve any deficiencies and to establish best practices for TSA headquarters and field offices. TSA also has an excellent working relationship with DHS's Ethics Office and works collaboratively with intra-agency ethics working groups to stay up-to-date on departmental policy changes and best practices pertaining to ethics. In early 2012, to ensure compliance with ethics policies and procedures, TSA performed an internal review of its OGE 278 program files for 2011 and prior years. During this review, TSA discovered the deficiencies in OGE 278 certifications and program compliance referenced in this OGE report, including the backdating of certification dates by a former TSA ethics attorney. TSA OCC leadership quickly addressed the [issue], removing the attorney from any ethics responsibilities (that attorney is no longer employed by TSA) and notifying TSA and DHS leadership of the problem, as well as the DHS Inspector General, and TSA's independent auditor. TSA also embarked on a more detailed review of its program and made sweeping management changes including appointing a senior executive with 22+ years of experience in the practice of law as the new Deputy Chief Counsel for General Law and promoting a seasoned ethics attorney to be the new Assistant Chief Counsel for Ethics and General Legal Services. Since initiating its internal review, OCC has implemented significant systemic changes to TSA's Ethics Program, including:

- Beginning in the Fiscal Year 2012 filing period, mandating electronic filing of OGE Forms 278 through the Financial Disclosure Management System by all filers to facilitate tracking and certification;
- Improving communications with TSA's Office of Human Capital to develop a system to identify new OGE 278 filers and termination filers through earlier visibility into changes of filer employment status to capture promotions and demotions.

- Developing written enhanced processes and procedures for OGE 278 tracking and certification, including implementing a quality control process where the Deputy Chief Counsel for General Law will review random samples of certified OGE 278 files for accuracy and to ensure proper certification and requiring initial review of all OGC 278 forms to be conducted within 30 days of receipt; and
- Dedicating additional personnel resources to address overdue OGE 278 files requiring certification and hiring additional full-time experienced ethics personnel to supplement the existing TSA ethics staff.

TSA OCC will continue to internally monitor the OGE 278 program and make process and procedural improvements as necessary.