



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

April 22, 2014

Damon Y. Smith
Acting General Counsel and DAEO
U.S. Department of Housing and Urban Development
451 7th Street S.W., Room 10110
Washington, DC 20410

Dear Mr. Smith:

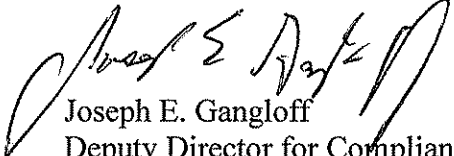
As a result of the onsite plenary review of the United States Department of Housing and Urban Development (HUD) the United States Office of Government Ethics (OGE) issued four recommendations in its August 2013 ethics program review report. In February 2014, OGE conducted a follow-up to assess the implementation of the recommendations. Based on the follow-up, we have determined that the recommendations have been implemented and are therefore closed:

	Recommendation	Agency Action	Status
1	Ensure that financial disclosure reports are assessed for retention and destroyed when appropriate.	HUD implemented an automatic alert to destroy reports older than six years, upon confirmation from the Office of the Inspector General that there are no reports subject to pending investigations.	Closed
2	Improve the timeliness of filing and certification of confidential financial disclosure reports.	Our follow-up sample of confidential financial disclosure reports found that while timeliness of new entrant report filing remained constant at 89%, there was improvement in the timeliness of annual report filing (75% to 83%) and certification of both new entrant (86% to 100%) and annual (88% to 100%) reports. Also, to improve timely certification of reports, HUD has put in place a policy to alert certifiers weekly of the financial disclosure reports that are ready for certification.	Closed

3	Ensure that all new employees receive initial ethics orientation within 90 days of employment.	HUD's ethics office coordinated with the human resources office to receive monthly email updates on new employees. Additionally, new employees are required to certify receipt of initial ethics orientation via sign-in sheets or through email certifications.	Closed
4	Escalate instances where filers have not confirmed training attendance.	HUD has established a process for contacting filers' supervisors to ensure receipt of training and confirm attendance.	Closed

Thank you for your assistance during the follow-up process. We encourage you to contact your Desk Officer for ethics program support.

Sincerely,



Joseph E. Gangloff
Deputy Director for Compliance