



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

March 12, 2012

Elaine Kaplan  
General Counsel and Designated Agency Ethics Official  
Office of Personnel Management  
Room 7353  
1900 E Street, N.W.  
Washington, DC 20415

Dear Ms. Kaplan:

The United States Office of Government Ethics (OGE) recently conducted a follow-up review of the ethics program at the U.S. Office of Personnel Management (OPM) to determine whether the improvements recommended in our August 2011 report have been achieved. Below are the results of the follow-up review.

During OGE's initial review of OPM's ethics program, OGE found that OPM had challenges in timely identifying new entrant confidential financial disclosure filers. OGE's initial report recommended that OPM establish a mechanism to ensure that the Ethics Points of Contact (POC) were aware of and meet their responsibilities related to identifying new entrant confidential financial disclosure filers.

To address OGE's concern, the Principal Deputy Ethics Official (Principal DEO) and an administrative assistant periodically call and email the POCs to remind them to inform the ethics office of new entrant confidential financial disclosure filers. In addition, the Principal DEO worked closely with the Human Resources Office to establish new procedures to help ensure the timely filing of new entrant confidential financial disclosure reports. This included revising the Supervisory and Administrative Officers Checklist for New Employees to remind supervisors to verify whether an employee is required to file a financial disclosure report, as well as annotating the filing status on the employee position description.

OGE's follow-up review team examined the 8 new entrant confidential financial disclosure reports filed since the initial review. All reports were filed timely. The available evidence indicates that the various mechanisms put in place have contributed to the timely identification of the new entrant filers; and therefore, the recommendation has been closed.

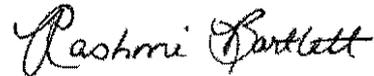
OGE's initial review also suggested ethics officials review the filing criteria for confidential financial disclosure reports to ensure that only employees who meet the definition are required to file. In regards to the suggestion, each office head, along with the Office of

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General Counsel took action by reviewing the filing criteria which created a reduction in filers. OGE acknowledges the action and this approach and has closed this issue.

Based on our follow-up we have determined that OPM has adequately implemented the recommendation in the August 2011 review report. As a result, OGE has closed the recommendation. In addition, OGE has considered OPM's actions regarding the suggestion in the August 2011 report and considers that issue closed as well. 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 cursive script that reads "Rashmi Bartlett".

Rashmi Bartlett  
Associate Director