



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

August 14, 2012

Mr. Paul Kollmer-Dorsey  
Acting General Counsel  
Broadcasting Board of Governors  
Room 3360, Cohen Building  
330 Independence Avenue, SW.  
Washington, DC 20237

Dear Mr. Kollmer-Dorsey:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the Broadcasting Board of Governors (BBG) to determine how the recommendations and suggestions in our July 2011 report have been addressed. OGE's initial review of BBG's ethics program identified four recommendations requiring agency action and provided two suggestions to further improve ethics program operations. Follow-up reviews are typically conducted six months following the publication of the initial program review. OGE extended this time frame an additional six months to allow for review of financial disclosure reports submitted in May of 2012.

OGE recommended BBG ensure public financial disclosure reports were technically complete before certifying them free from conflicts of interest. During the follow-up review, OGE reviewed all 21 public financial disclosures for 2012 for technical completeness and compared them against the corresponding 2011 submissions to identify changes, additions, and omissions that might lead to certifying an incomplete report. OGE found the 2012 reports to be generally complete with few minor technical issues which were discussed with BBG ethics officials at the conclusion of the review. OGE reviewers also observed ethics official notations and clarification questions between ethics officials and filers. BBG's improved financial disclosure review is responsive to OGE's recommendation. Therefore, the recommendation is closed.

OGE recommended BBG review and certify all financial disclosures within the required 60-day deadline. OGE reviewed all public financial disclosures and 162 of 394 confidential financial disclosures submitted in 2012. The 2012 public financial disclosures were certified within 60 days in 95% of all cases. Only one report was certified late at the 61-day mark. Five reports had not yet been certified while more information was being obtained from the filers. All five reports were still within the 60-day review and certification period. The 2012 confidential financial disclosures were reviewed and certified within 60 days in 99% of the 162 reports reviewed. Reviewers ceased further review when indications were clear that reports were

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predominantly reviewed and certified within 60 days of receipt. BBG has taken appropriate action responsive to OGE's recommendation. Therefore, the recommendation is closed.

OGE recommended BBG provide formal evidence of compliance for seven outstanding ethics agreements. BBG confirmed the seven employees with ethics agreements had complied with the terms of their agreements and provided OGE with the required compliance documentation. OGE records confirmed documentation receipt. BBG has taken appropriate action responsive to OGE's recommendation. Therefore, the recommendation is closed.

OGE recommended BBG ensure a process is in place to ensure future ethics agreement compliance documentation is provided to OGE in a timely manner. BBG provided a draft of its ethics agreement operating procedures for inclusion into agency procedures sometime in 2012. The draft procedures reflect BBG's ethics agreement process and, if followed, should eliminate delays in providing compliance documentation to OGE. BBG has taken appropriate action responsive to OGE's recommendation. Therefore, the recommendation is closed.

OGE suggested BBG develop written procedures for all elements of the ethics program to clarify processes and improve succession planning. In addition to the ethics agreement compliance procedures noted above, BBG is developing comprehensive procedures to cover all the functions and processes of the ethics program. OGE considers BBG's action responsive to this suggestion and has therefore closed the suggestion.

OGE suggested BBG formalize the relationship with the Human Resources (HR) office in order to better identify new confidential financial disclosure filers. BBG continues to work with HR to identify covered financial disclosure positions and standardizing internal processes. BBG acknowledges the process is made more complex by resource limitations and existing systemic challenges that need to be addressed prior to moving forward. Although BBG cannot provide a time frame for completion, OGE considers BBG's continued efforts to formalize the relationship with HR to be responsive to this suggestion and has therefore closed the suggestion.

Based on OGE's follow-up, we have determined that BBG has adequately implemented the recommendations from the July 2011 report. As a result, OGE has closed those recommendations. OGE is satisfied that BBG actions regarding the suggestions in the July 2011 report are generally responsive and considers those issues 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,



Rashmi Bartlett  
Associate Director