

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Gulf Coast Ecosystem Restoration Council (GCERC)

Follow-up to OGE Report Number: 24-28I

Report No.: 25-07IF

Date: October 24, 2024

UNITED STATES OFFICE OF
GOVERNMENT ETHICS


Preventing Conflicts of Interest
in the Executive Branch

As a result of the review of the Gulf Coast Ecosystem Restoration Council’s (GCERC) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its March 2024 inspection report. OGE conducted a follow-up review in August 2024 to assess whether GCERC ethics officials had taken sufficient action to close the four recommendations. The results of our follow-up review are summarized below.

| | Recommendation | Agency Action and OGE Finding | Status |
|---|--|---|---------------|
| 1 | <p>Establish written procedures for public financial disclosure to address how the agency will now handle the collection, review, and public availability of periodic transaction reports (OGE Form 278-T) and public financial disclosure reports (OGE Form 278).</p> <p>OGE also recommends that these procedures properly reflect the agency’s use of <i>Integrity</i>, OGE’s secure public-facing web-based electronic financial disclosure reporting system, in administering the agency’s public financial disclosure system. These procedures should also include the process for requesting and granting filing extensions, the process for collecting the \$200 late filing fee and how to request a waiver of the \$200 late filing fee.</p> | <p>During the follow-up review, OGE assessed the procedural measures put in place by ethics officials to meet Recommendation One. Under the agency’s Administrative Policies and Procedures Handbook, Chapter 13 of Human Resources, Section 4 has been enhanced with the addition of a new Part D specifically addressing public financial disclosure requirements.</p> | Closed |
| 2 | <p>Update the agency’s written procedures for issuing notices to prospective employees.</p> | <p>The DAEO implemented OGE’s suggestions and revised the agency’s written procedures for issuing notices to prospective employees.</p> | Closed |
| 3 | <p>Ensure the agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment from the Department of Treasury’s Bureau of Fiscal Services (BFS).</p> | <p>At the time of OGE’s fieldwork, it was found that no covered employees were required to receive a written offer of employment. OGE reviewed a template written offer letter provided to all prospective employees. OGE is closing this recommendation given that the template letter complies with 5 CFR part 2638.303. This area of GCERC’s ethics program will be reassessed during the next examination of the agency’s ethics program.</p> | Closed |

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Gulf Coast Ecosystem Restoration Council (GCERC)

Follow-up to OGE Report Number: 24-28I

Report No.: 25-07IF

Date: October 24, 2024

UNITED STATES OFFICE OF
GOVERNMENT ETHICS


Preventing Conflicts of Interest
in the Executive Branch

| | | | |
|---|---|---|--------|
| 4 | Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f). | During the follow-up review, OGE assessed the written procedures developed for initial ethics training and found them to be compliant with relevant requirements. | Closed |
|---|---|---|--------|

Based on the results of OGE’s follow-up review, all recommendations have been closed.