

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: United States Interagency Council on Homelessness

Follow-up to OGE Report Number: 23-09I

Report No.: 25-15IF

Date: November 14, 2024

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch

As a result of its review of the ethics program at the United States Interagency Council on Homelessness (USICH), the Office of Government Ethics (OGE) issued nine recommendations in its January 2023 review report. OGE has conducted a follow-up review to assess whether USICH has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	<p>Ensure that the MOU between USICH and HUD reflects current requirements. In addition, ensure that this MOU outlines all services provided by HUD for each section in the Contributions of Parties section (listed below).</p> <p>Contribution of Parties section in MOU:</p> <ol style="list-style-type: none"><li>1. Program Administration – Outline all HUD services</li><li>2. Financial Disclosure – Outline all HUD services for both public and confidential programs</li><li>3. Education and Training – Outline all HUD services for initial and annual ethics training programs</li><li>4. Advice and Counsel – Outline all HUD services</li><li>5. Ethics Notices – State that HUD provides no services</li></ol>	<p>OGE reviewed USICH's and HUD's MOU and found that the Contributions of Parties section now sufficiently outlines the services HUD provides to the USICH ethics program.</p>	Closed

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2	<p>USICH must revise internal written procedures covering the public financial disclosure program. To be in compliance with applicable requirements, these revised procedures must, at a minimum, cover items 1 – 7 (listed below) in order to sufficiently specify and document the full scope of the services performed by both USICH and HUD in administering the ethics program:</p> <ol style="list-style-type: none"><li>1. Collection of reports</li><li>2. Review of reports</li><li>3. Availability of reports</li><li>4. How ethics officials are notified of appointments as well as current filer position changes (e.g., terminations)</li><li>5. Maintenance and retention of reports</li><li>6. Extensions, late fees, and waivers</li><li>7. Any other aspects where HUD provides a service related to the public financial disclosure program</li></ol>	<p>OGE reviewed the revised written procedures covering USICH's public financial disclosure program and found they sufficiently cover items 1 – 7.</p>	Closed
3	<p>Part A: Ensure that all public financial disclosure reports are reviewed and certified timely.</p> <p>Part B: Ensure that all confidential financial disclosure reports are filed, reviewed, and certified timely.</p>	<p>OGE examined the one public financial disclosure report and the one confidential financial disclosure report required in 2023 and found they both were filed, reviewed, and certified timely.</p>	Closed
4	<p>Ensure that the existing written procedures covering the confidential financial disclosure program further include all HUD services and systems related to the maintenance and retention of confidential financial disclosure reports.</p>	<p>OGE reviewed the revised written procedures covering USICH's confidential financial disclosure program and found they sufficiently cover HUD's role.</p>	Closed

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5	Ensure that ethics notices are sent to prospective employees with the required language.	OGE reviewed three notices issued to prospective employees and found they included all required language.	Closed
6	Ensure that ethics notices are sent to new supervisors with the required language.	USICH has not had any new supervisors in recent years. Thus, there are no new notices available for review.	Open
7	Develop written procedures covering annual ethics training that specifies the services provided by HUD.	OGE reviewed the new written procedures covering annual ethics training and found that they specify the services provided by HUD.	Closed
8	Develop written procedures for providing advice and counseling that specifies the services provided by HUD.	OGE reviewed the new written procedures covering advice and counseling and found that they specify the services provided by HUD.	Closed
9	Ensure that USICH's written procedures and the MOU (if HUD will provide these services) cover financial disclosure and ethics training requirements for Council members (including alternates that attend Council meetings).	OGE reviewed the revised written procedures covering Council members and found they sufficiently covered both financial disclosure and ethics training requirements.	Closed

Based on the results of OGE's follow-up review, all but recommendation 6 are closed. OGE will conduct another follow-up review to assess the status of recommendation 6.