



What Does a Program Review Team Look For?

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INTRODUCTION

Plenary & Inspection

Broad
Systems Analysis

Streamlined
Risk Assessment



SCOPE & METHODOLOGY

Last Calendar Year
Interviews
Document Sampling



PROGRAM ELEMENTS

Administration & Leadership

Program Structure
Leadership Support
Program Controls



PROGRAM ELEMENTS

Financial Disclosure

Written Procedures

Filer Data

Timeliness



PROGRAM ELEMENTS

Financial Disclosure

Quality
Record Handling
Process



PROGRAM ELEMENTS

Education & Training

Training Plan

Content

Completion

Process



PROGRAM ELEMENTS

Advice & Counsel

Sample
Process



PROGRAM ELEMENTS

Supplemental Standards of Conduct

Compliance

Prohibitions

Outside Activities



Conflict Remedies

Ethics Agreements
Compliance
Notification



Conflict Remedies

208 Waivers
Consultation
Process



PROGRAM ELEMENTS

Enforcement

DOJ Referrals
Referral Process



PROGRAM ELEMENTS

Special Government Employees

Tracking

Financial Disclosure

Training



PROGRAM ELEMENTS

31 U.S.C. § 1353 Travel

Collection
Submission

Questions?

Plenary Reviews?
Inspections?
Program Elements?
Anything Else?