



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

April 30, 2013

Michael C. Wholley
General Counsel
National Aeronautics and Space Administration
300 E St. SW,
Washington, DC 20546-0001

Dear Mr. Wholley:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the National Aeronautics and Space Administration (NASA) to determine how the recommendations from our September 2012 report have been addressed.

OGE recommended that NASA develop an action plan to address the late review and certification of public financial disclosure reports. NASA responded that it would reprioritize its workflow to complete the review of public financial disclosure reports within the 60-day regulatory timeframe. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

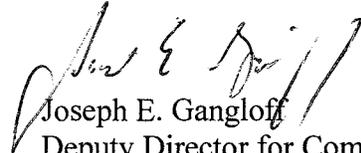
OGE recommended that NASA identify the reasons for and develop an action plan to address problems with the timely identification of new entrant confidential financial disclosure report filers. NASA responded that it had challenges sharing and exchanging data between various information systems. Consequently, there were potential gaps within NASA's Ethics Program Tracking System (EPTS), a Web-based filing and tracking system that enables covered employees to electronically file and digitally sign financial disclosure reports. To address this issue, ethics officials stated that they held discussions with key agency stakeholders and made several changes to EPTS to improve the timely identification of new filers. Ethics officials also stated that they would monitor progress in this area to determine whether any further steps are needed. OGE considers these actions responsive to the recommendation. Therefore, the recommendation is closed.

OGE recommended that NASA provide peer reviewers with annual ethics training pursuant to 5 C.F.R. § 2638.705(a). OGE found during its September review that peer reviewers who filed alternative financial disclosure forms had not received annual ethics training. In its response, NASA stated it would give these reviewers written ethics training before subsequent proposal reviews. OGE considers this action responsive to the recommendation. Therefore, the recommendation is closed.

Mr. Michael C. Wholley
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Based on OGE's follow-up, we have determined that NASA has adequately addressed the recommendations from the September 2012 report. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9220 if you require any additional information.

Sincerely,



Joseph E. Gangloff
Deputy Director for Compliance