

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Marine Mammal Commission

Follow-up to OGE Report Number: 23-14I

Report No.: 25-61IF

Date: June 2, 2025

UNITED STATES OFFICE OF
GOVERNMENT ETHICSPreventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Marine Mammal Commission (MMC) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its February 2023 review report. OGE conducted a follow-up review to assess whether MMC 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	Ensure that confidential financial disclosure reports are submitted timely.	OGE examined all confidential reports required to be filed at MMC during 2024. Just 1 of 6 (17%) was filed timely.	Open
2	Collect the one outstanding 2021 SGE confidential financial disclosure report.	MMC took action to collect the outstanding report and provided OGE with a copy for review.	Closed
3	Ensure that SGEs receive required annual or initial ethics training presentations that qualify as live or interactive.	<p>The bulk of SGEs in 2024 received live training on an interactive phone call from MMC's Designated Agency Ethics Official (DAEO). OGE examined the content of the training and found it met applicable requirements.</p> <p>Two SGEs were unable to attend this presentation and were instead provided with a copy of OGE's summary of the Standards of Ethical Conduct to review followed by a phone call with the DAEO to go over their questions. The combination of written materials and live follow-up also met applicable requirements.</p>	Closed

Based on the results of OGE's follow-up review, recommendations 2 and 3 are closed. OGE will conduct an additional review to assess whether MMC has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.