

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



October 18, 2016

Elizabeth Parish
Interim General Counsel and
Designated Agency Ethics Official
Broadcasting Board of Governors
330 Independence Avenue, SW
Room 3360
Washington, DC 20237

Dear Ms. Parish:

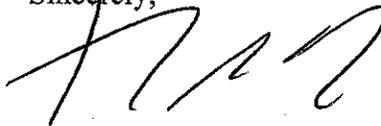
As a result of its review of the Broadcasting Board of Governors' (BBG) ethics program, the Office of Government Ethics (OGE) issued eight recommendations in its May 2015 inspection report. OGE recently conducted a follow-up review to determine whether BBG has taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Findings	Status
1	Ensure written procedures are in place governing the review and evaluation of OGE Forms 278 and 278-T and the public availability of the OGE Form 278-T.	BBG updated its written procedures for public financial disclosure to include procedures for review and evaluation of OGE Forms 278 and 278-T and the public availability of the OGE Form 278-T.	Closed
2	Ensure PAS public financial disclosure reports are filed timely in accordance with 5 C.F.R. § 2634.201(a) and (e).	OGE reviewed the one PAS annual public financial disclosure report required to be filed since OGE's review and determined the report was filed timely.	Closed
3	Destroy any confidential financial disclosure reports found to have been retained beyond their destruction date in accordance with 5 C.F.R. § 2634.604.	OGE reviewed a sample of confidential financial disclosure report files and determined reports are being maintained in accordance with 5 C.F.R. § 2634.604.	Closed

4	Ensure new entrant confidential financial disclosure reports are filed timely in accordance with 5 C.F.R. § 2634.903(b).	BBG Ethics Officials are continuing to improve communication with human resources and supervisors to identify and notify employees required to file new entrant reports. OGE examined a sample of new entrant confidential financial disclosure reports filed subsequent to our review and recommendation. The average number of days to collect new entrant confidential financial disclosure reports decreased from 230 days to 21 days.	Closed
5	Ensure annual confidential financial disclosure reports are filed timely in accordance with 5 C.F.R. § 2634.903(a).	During the 2016 filing cycle, BBG Ethics Officials emailed several reminders to filers with outstanding reports and to their supervisors. OGE examined a sample of annual confidential financial disclosure reports filed subsequent to our review and recommendation. The average number of days to collect annual confidential financial disclosure reports decreased from 22 days to 4 days.	Closed
6	Ensure confidential financial disclosure reports are certified timely by ethics officials in accordance with 5 C.F.R. §§ 2634.605(a), 2634.909(a).	OGE examined a sample of new entrant and annual confidential financial disclosure reports filed subsequent to our review and recommendation. All had been certified timely.	Closed
7	Ensure all annual ethics training packages include reviews of the criminal conflict of interest statutes, Standards of Ethical Conduct, and 14 Principles.	BBG's Assistant General Counsel developed a new presentation for annual ethics training, which included the criminal conflict of interest statutes, Standards of Ethical Conduct, and the 14 Principles, consistent with applicable requirements.	Closed
8	Ensure public financial disclosure filers receive annual ethics training in accordance with 5 C.F.R. § 2638.704(a).	OGE reviewed BBG's annual ethics training records and determined 100% of public filers received annual ethics training in 2015.	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance