

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



September 22, 2016

Philip Hertz
Deputy General Counsel
Pension Benefit Guaranty Corporation
Office of the General Counsel
1200 K Street, NW
Washington, DC 20005

Dear Mr. Hertz:

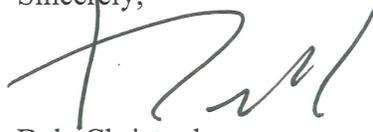
As a result of its review of the Pension Benefit Guaranty Corporation's (PBGC) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its February 2016 review report. OGE recently conducted a follow-up review to determine whether PBGC has taken sufficient action to resolve the deficiency underlying the recommendation. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Findings	Status
1	Implement corrective action to ensure that new entrant confidential reports are timely filed. Corrective action may require increased coordination with the agency's human resource office.	<p>PBGC ethics officials are now coordinating directly with the agency's Human Resources Department to help improve their ability to timely identify new entrant filers and ensure that new entrant reports are timely filed.</p> <p>Each month, a Human Resources Specialist provides PBGC ethics officials with a list of new employees, employees who have been promoted (including temporary promotions), and employees who have changed to a lower grade.</p> <p>OGE examined 11 new entrant confidential reports filed at PBGC from April through June 2016 (there were no new entrant reports filed in July or August 2016). OGE found all 11 new entrant reports were timely filed.</p>	Closed

Mr. Philip Hertz
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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,

A handwritten signature in black ink, appearing to read 'Dale Christopher', written in a cursive style.

Dale Christopher
Deputy Director for Compliance