



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

Memorandum

JUL 24 2017

To: Allen Lawrence  
Division Chief, Internal Control and Audit Follow-up, Office of Policy,  
Management and Budget

From: Jeff Carlson   
Director, Energy Audits Unit

Subject: Verification Review of Recommendations for the Report Titled "U.S. Geological  
Survey's Ethics Program," (CR-IS-GSV-0006-2014)  
Report No. 2017-EAU-035

The Office of Inspector General has completed a verification review of six recommendations presented in the subject report. Our objective of this review was to determine whether the U.S. Geological Survey (USGS) implemented the six recommendations as reported to the Office of Financial Management (PFM), Office of Policy, Management and Budget. We concur that all six recommendations are resolved and implemented.

## **Background**

Our report, "U.S. Geological Survey's Ethics Program," issued March 31, 2015, made six recommendations to address financial disclosure filings requirements, ethics training requirements, and an automated system to track both financial disclosure filings and ethics training.

The USGS Director concurred with the report's recommendations in a memorandum dated May 8, 2015, and detailed the USGS's plans to implement them. In a May 13, 2015, memorandum, we referred the recommendations to the Assistant Secretary for Policy, Management and Budget to track their implementation.

## **Scope and Methodology**

The scope of this review was limited to determining whether USGS implemented the recommendations we reported. To accomplish our objective, we reviewed the OIG inspection report, USGS' responses to each recommendation, and evidence that supports PMB's closure of each recommendation.

## **Results of Review**

Our current review found that USGS has resolved and implemented each of the six recommendations.

**Recommendation 1:**

Develop and implement detailed guidance for determining who should file a confidential financial disclosure report so that associate directors and regional directors consistently apply the criteria when determining filing status.

**Action Taken:**

1. USGS has developed financial disclosure criteria, and provided this data to USGS staff.
2. USGS engaged directors and management in determining which USGS staff need to submit financial disclosure reports.
3. USGS included financial disclosure report filing as part of USGS' 2016 ethics training.

**Recommendation 2:**

Continue to distribute the Financial Guide to all USGS employees annually, and provide subsequent guidance as needed.

**Action Taken:**

1. USGS' Ethics Office informed USGS staff of changes to the financial guide.

**Recommendation 3:**

Provide periodic ethics training for all USGS employees.

**Action Taken:**

1. USGS' Director informed all USGS staff of the mandatory annual ethics training requirement.
2. USGS' Ethics Office has automated the training that includes reminders to help track the mandatory, annual ethics training requirement.

**Recommendation 4:**

Disseminate annual ethics training throughout the calendar year and provide subsequent reminders to give employees ample time and notice to complete the training.

**Action Taken:**

1. USGS' Director informed all USGS staff of the mandatory, annual ethics training requirement.
2. USGS' Ethics Office has notified USGS staff with periodic e-mail reminders.

**Recommendation 5:**

Consider using an automated system to deliver and track annual training and to automatically notify employees of training due dates.

**Action Taken:**

1. USGS' Director informed all USGS staff of the mandatory, annual ethics training requirement.
2. USGS' Ethics Office has automated the training that includes reminders to help track the mandatory, annual ethics training requirement.

**Recommendation 6:**

Use one system to track financial disclosure filers and develop a joint Ethics and Human Resources standard operating procedure (SOP) on the process of consolidating the lists of filers.

**Action Taken:**

1. USGS' Office of Human Resources has developed a joint SOP that allows discrepancies to be identified and resolved.
2. The responsibilities of each office is clearly defined in the financial disclosure reports process for USGS' staff.

**Conclusion**

We informed USGS and PFM officials of the results of this review on April 27, 2017. USGS and PFM accepted the results of our review, and declined an exit conference.

We would like to thank USGS for providing the data requested during our review. If you have any questions concerning this memorandum, please contact me at 303-236-9243.

cc: William Werkheiser, Acting Director, USGS  
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