

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: U.S. Department of Housing and Urban Development

Follow-up to OGE Report Number: 18-53

Report No.: 20-20F

Date: May 12, 2020

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

As a result of its review of the U.S. Department of Housing and Urban Development (HUD) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its September 2018 review report. OGE conducted a follow-up review to assess whether HUD has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action/OGE Finding	Status
1	Ensure that new entrant confidential financial disclosure reports are filed timely.	OGE examined a sample of 26 new entrant confidential reports filed in 2018 and 2019 and found that 24 (92%) were filed timely.	Closed
2	Ensure that new entrant confidential reports are reviewed timely and certified within 60 days of filing, unless further information is being sought from the filer or remedial action is being taken.	OGE reviewed a sample of 26 new entrant confidential reports filed in 2018 and 2019 and found that all were reviewed timely and 20 (77%) were certified within 60 days of filing. The 6 reports that were certified more than 60 days after filing were the result of the reviewer seeking further information from the filer.	Closed
3	Ensure that annual confidential financial disclosure reports are certified within 60 days of filing, unless further information is being sought from the filer or remedial action is being taken.	OGE reviewed a sample of 27 annual confidential reports filed in 2018 and 2019 and found that all were reviewed timely and 26 (96%) were certified within 60 days of filing.	Closed
4	Implement back-up procedures to ensure that SGE financial disclosure reports can be collected, reviewed, and certified timely in the event of the failure or inaccessibility of FDOnline.	HUD provided OGE the back-up procedures it developed to ensure SGE financial disclosure reports can be collected, reviewed, and certified timely in the event of the failure or inaccessibility of FDOnline.	Closed
5	Ensure that all SGE advisory committee members receive annual ethics training in 2018.	To evaluate HUD's implementation of this recommendation, OGE examined information provided by HUD for the 11 SGEs who served as advisory committee members in 2019. According to information provided, 4 SGEs from the sample were required to receive annual ethics training in 2018. Of these 4 SGEs, 3 (75%) received the training in 2018. The SGE that did not receive the required training in 2018 received it in February 2019.	Closed

Based on the results of OGE's follow-up review, all recommendations are closed.