

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 6, 2016

Peggy R. Mastroianni
Designated Agency Ethics Official
U.S. Equal Employment Opportunity Commission
Office of Legal Counsel
131 M Street, NE, 5th Floor
Washington, DC 20507

Dear Ms. Mastroianni:

As a result of its inspection of the Equal Employment Opportunity Commission's (EEOC) ethics program, the United States Office of Government Ethics (OGE) issued one recommendation in its July 2015 inspection report. On November 3, 2015, OGE conducted a follow-up review to assess EEOC's implementation of the recommendation. OGE has determined that this recommendation should remain open. The results of the follow-up review are summarized below.

Recommendation
Implement corrective action to ensure that new entrant confidential reports are filed timely. This corrective action may require increased coordination with the agency's Chief Human Capital Officer and District Directors.
Agency Action
<p>During the follow up, OGE was advised of the various measures that EEOC has undertaken since the completion of the OGE inspection to help improve timeliness in new entrant confidential filing. These measures include:</p> <ol style="list-style-type: none">1) Sending quarterly reminders of the new entrant confidential filing requirement to EEOC's District Resource Managers. District Resource Managers are responsible for tracking such personnel matters as appointments, promotions and details to the various field office positions, including covered confidential filing positions, and most of EEOC's covered positions are located in the field offices.2) Tasking an Ethics Compliance Officer (ECO) with conducting a bi-weekly review of EEOC's personnel database to help identify new hires and promotions within EEOC.3) Having EEOC's personnel office provide a monthly list of new EEOC hires to the Ethics Office. Although this list duplicates some of the information that is available to the ECO on a bi-weekly basis, this list is used in two ways: 1) to identify new hires that have not yet completed their initial ethics orientation training and 2) to identify new hires who have not yet filed a new entrant confidential report with the EEOC Ethics Office.

- 4) Directly contacting new or detailed employees to check whether they have been notified of the requirement to file a new entrant confidential report.

According to EEOC ethics officials, from January 1, 2015 to November 9, 2015, EEOC had received 23 new entrant confidential reports. Of these 23 reports, 19 were filed late. OGE was advised that 18 of the 19 reports were filed before the Ethics Office had the opportunity to implement the actions identified above to help ensure the timely filing of new entrant confidential reports.

OGE was also advised of five other filers who had been placed in covered positions during 2015 but for whom the Ethics Office had yet to receive new entrant reports. For each of these filers, ethics officials are working to identify the cause of their failure to file and will take additional steps to collect their reports.

Status of Recommendation: **Open**

The findings of OGE's follow up reveal continued weakness in new entrant financial disclosure report filing at EEOC. In order evaluate whether the recent actions EEOC has taken to improve filing timeliness are sufficient, OGE will conduct another follow up at EEOC within six months of the date of this letter.

Sincerely,



Dale Christopher
Deputy Director for Compliance