

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



September 28, 2018

Robert Shanks
General Counsel and
Designated Agency Ethics Official
Peace Corps
Paul D. Coverdell
Peace Corps Headquarters
1111 20th Street NW
Washington, DC 20526

Dear Mr. Shanks:

As a result of its review of the Peace Corps ethics program, the Office of Government Ethics (OGE) issued three recommendations in its June 2017 review report. OGE recently conducted a follow-up review to assess whether Peace Corps has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that non-PAS new entrant public financial disclosure reports are filed timely.	Ethics officials indicated that the ethics office receives bi-weekly and monthly reports from the Human Resources (HR) and program offices to identify new entrant filers. However, ethics officials explained that the ethics program has encountered a series of challenges, including staff turnover, which have prevented ethics officials from meeting some programmatic requirements. OGE reviewed a sample of non-PAS new entrant reports and found that only 29% of the reports were filed timely. During OGE's initial review, the percentage of non-PAS new entrant public reports in OGE's sample that were filed timely was 46%.	Open

Report No. 18-60IF

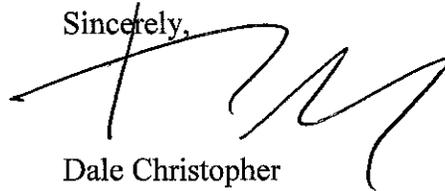


2	Ensure that all public financial disclosure reports are certified timely.	Ethics officials explained that the ethics staff has been reduced since OGE's initial review. This has impacted Peace Corps' ability to timely certify financial disclosure reports. OGE examined a sample of public reports and found that only 53% were certified timely. During OGE's initial review, the percentage of public financial disclosure reports in OGE's sample that were certified timely was 67%.	Open
3	Ensure that new entrant confidential financial disclosure reports are filed timely.	As noted, ethics officials receive bi-weekly and monthly reports from HR and program offices. Ethics officials stated that they will continue to work with HR and program offices to help ensure the ethics office is notified of any new hires or promotions to positions requiring filing of confidential financial disclosure reports. OGE examined a sample of new entrant confidential reports and found that only 19% were filed timely. During OGE's initial review, the percentage of new entrant confidential financial disclosure reports in OGE's sample that were filed timely was 20%.	Open

I am concerned that Peace Corps' performance in the areas addressed by our recommendations has declined since our review, rather than improved. However, we have reviewed the list of actions Peace Corps has taken or plans to take and will conduct another follow-up review to assess the effectiveness of these plans in addressing OGE's recommendations.

I appreciate the courtesies extended to the OGE program review staff and look forward to finding improvement in the Peace Corps ethics program during our next follow-up review. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance