

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



April 13, 2016

Susan Winchell  
Assistant General Counsel and Designated  
Agency Ethics Official  
Department of Education  
400 Maryland Avenue, SW, Room 6E225  
Washington, DC 20202

Dear Ms. Winchell:

As a result of its review of the Department of Education's (Education) ethics program, the United States Office of Government Ethics (OGE) issued one recommendation in its September 2015 ethics program review report. In March 2016, OGE conducted a follow-up review to assess whether Education has taken action sufficient to resolve the deficiencies underlying the recommendation. The results of the follow-up review are summarized below.

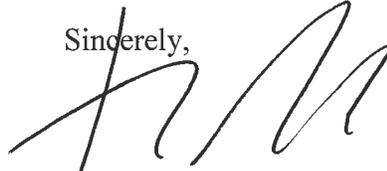
Recommendation
Continue to implement corrective action to ensure that new entrant confidential reports are filed timely.
Agency Action
<p>During the follow-up, OGE was advised of the various measures that Education has undertaken since the completion of the OGE review to help improve timeliness of new entrant confidential filing. These measures include:</p> <ol style="list-style-type: none"><li>1) Sending quarterly reminders, instead of annual reminders, to Executive Officers, who are responsible for informing the Ethics Division when contracting appointments occur, to help remind them of the filing requirement.</li><li>2) Sending quarterly reminders to Education's Office of the Chief Financial Officer which can provide ethics officials with an updated list of employees who are fulfilling contracting duties as either a Contract Specialist, Contracting Officer (CO), or Contracting Officer's Technical Representative (COTR).</li><li>3) Periodically monitoring Education's Federal Student Aid's (FSA) website to help obtain updated information regarding FSA employees who are fulfilling contracting duties as either Contract Specialist, CO, or COTR.</li></ol>
Status of Recommendation: <b>Open</b>

Ms. Susan Winchell

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Education's Alternate Designated Agency Ethics Official indicated during the follow-up review that the measures above are still a work in progress. OGE concurs with Education that the measures appear to be appropriate steps toward resolving the issue of late new entrant confidential filing, but that more time is needed to determine whether they are effective. OGE will conduct a second follow-up in September 2016 to assess the results of Education's actions and whether this recommendation can be closed.

Sincerely,

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

Dale Christopher  
Deputy Director for Compliance