



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Rosalind A. Knapp  
Designated Agency Ethics Official  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Ms. Knapp:

As part of our monitoring activities, the United States Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program administered at the U.S. Department of Transportation (DOT). The findings from our review revealed that improvements were needed to help bring DOT's financial disclosure program into full compliance with ethics laws and regulations. As a result of these findings, OGE recommended 25 specific actions. In addition to these recommendations, our report also cited a number of suggestions and good management practices to help DOT improve its management and coordination of the financial disclosure program.

OGE conducted follow-up reviews at the individual operating administrations (modes) that were issued formal recommendations to determine whether or not actions were taken to affect closure on the open recommendations contained in the July 2010 report.<sup>1</sup> Based on the results of our follow-up reviews, OGE has determined that of the 25 recommendations, 3 will remain open pending further follow-up. OGE will follow-up again six months from the date of this letter to determine whether to close these recommendations.

The open recommendations involve the need for the Federal Transit Administration, the Federal Highway Administration, and the Research and Innovative Technology Administration to improve the timeliness in new entrant confidential filing. Although our findings continue to reveal weaknesses in this area, we do believe that the steps each mode has taken to address this issue should ensure future compliance. The steps taken thus far include such actions as establishing renewed partnerships with personnel offices; receiving bi-weekly listings of all personnel changes, including new hires, departures, promotions, and reassignments; and identifying during initial ethics orientation new hires who might be required to file a confidential report. Additionally, we found each modes' Deputy Ethics Official committed to improving this area of DOT's ethics program.

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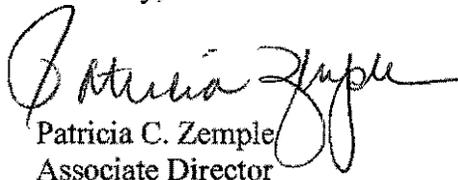
<sup>1</sup>Individual reports from our follow-up reviews have been provided to each operating administration.

In addition to the formal recommendations highlighted in our July 16, 2010 report, OGE made suggestions throughout DOT to help improve the effectiveness of the financial disclosure program. We were pleased to see that all modes found our suggestions useful and have implemented them into their ethics program. In light of the role that financial disclosure plays in preventing employees from committing ethics violations, these improvements have provided OGE with reasonable assurance that DOT will be able to sustain long-term systematic improvement for both its public and confidential financial disclosure systems. To ensure that these improvements are sustained long term, however, you must remain diligent in (1) improving timeliness in new entrant confidential filing, (2) ensuring the quality and timeliness of review and certification of financial disclosure reports, and (3) maintaining formal oversight of the ethics programs in each operating administration. Your consideration of incorporating an e-filing system DOT-wide either by expanding upon FAA's current system or by adopting another system may also prove helpful toward preventing some of the issues OGE identified in our July 2010 report from occurring in the future.

In closing, as you work to improve the financial disclosure program across the agency, OGE stands ready to provide any expertise or advice you may need. Should you or your staff have any questions, please feel free to contact David Meyers at (202) 482-9263 or by email at [dameyers@oge.gov](mailto:dameyers@oge.gov).

I appreciate the courtesies you have extended to the OGE staff. If you would like to discuss the report or follow up, please feel free to contact me at (202) 482-9286 or by email at [pczemple@oge.gov](mailto:pczemple@oge.gov).

Sincerely,



Patricia C. Zemple  
Associate Director

Attachment



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Marc L. Warren  
Deputy Ethics Official  
Federal Aviation Administration  
800 Independence Ave. SW  
Washington, DC 20591

Dear Mr. Warren:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Federal Aviation Administration (FAA). Based on the results of our findings, OGE recommended that your office take the following actions: (1) take immediate action to remedy the 21 confidential reports identified as having a real or potential conflict of interest; (2) establish formal procedures, in collaboration with the DAEO, to address the process for ensuring that divestiture appeals made by FAA employees are timely resolved; (3) institute the practice of routinely conducting "ethics assistance reviews" as it relates to the confidential financial disclosure system outside of FAA headquarters to help ensure proper management focus and attention within the FAA regions; and (4) update FAA's written procedures for administering both its public and confidential financial disclosure systems. Our report also offered several suggestions for program improvement.

On June 15, 2011, we met with you, Lisa Baccus, the primary ethics official for FAA, and members of your ethics staff to determine whether or not action was taken to effect closure on the four recommendations contained in our July 2010 report. We met again with Ms. Baccus on July 7, 2011, to obtain additional information needed to complete our review. Based on the results of our follow-up review, OGE determined that FAA has satisfied all four recommendations. This letter confirms that all four recommendations are now closed.

In addition to discussing FAA's progress in addressing these four recommendations, we also followed-up on whether action had been taken to address our suggestions. As you know, our report suggested that FAA ensure that (1) public filers are made aware of certain reporting errors and omissions and (2) continual improvements are made to the financial disclosure tracking system. We were pleased to learn during our discussions that your office has taken appropriate steps to address our suggestions. We encourage you to be mindful of these issues during future filing cycles to help ensure the effectiveness of FAA's financial disclosure program.

Marc Warren  
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Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Zemple". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Thomas P. Holian  
Deputy Ethics Official  
Federal Highway Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Holian:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Federal Highway Administration (FHWA). Based on our findings, we recommended that your office take the following actions: (1) improve timeliness in new entrant confidential filing and (2) modify FHWA's written procedures for administering both the public and confidential financial disclosure system. Our report also offered several suggestions for program enhancement.

On May 17, 2011, we met with Grace Reidy, a Senior Attorney on your staff, to determine whether or not action was taken to effect closure on the two recommendations contained in our July 2010 report. Based on the results of our follow-up review, this letter confirms OGE's determination that Recommendation 1 will remain open pending further follow-up. Recommendation 2 is now closed.

Recommendation 1 directed FHWA to improve the timeliness of new entrant confidential filing. We were pleased to learn of the various measures that FHWA has undertaken to help improve timeliness in new entrant confidential filing. These measures include:

- making FHWA's Office of Human Resources (OHR) responsible for including a statement in the vacancy announcement that the position requires filing of a new entrant confidential financial disclosure, as applicable;
- identifying during initial ethics orientations new hires who might be required to file a confidential report; and
- receiving from OHR a bi-weekly spreadsheet listing of all new hires, promotions, and lateral transfers within FHWA.

Additionally, your office has developed a new process, in coordination with FHWA's Office of Acquisition Management, to help improve timeliness of new entrant confidential report filing by employees who assume Contracting Officer Technical Representative (COTR) responsibilities throughout the course of the year.

We believe these actions, along with any prospective actions, should help to ensure regulatory compliance with 5 CFR § 2634.903(b). Based on the results of our follow-up review, however, additional follow-up is needed before OGE can reasonably determine that these measures are effective. For example, during our follow-up visit we examined 39 new entrant confidential reports that were required to be filed in 2010 and 2011 and found 18 of them had been filed late. Realizing that identifying employees entering or transferring into a covered position can be a challenge for any confidential financial disclosure program, OGE will follow-up again six months from the date of this letter to determine whether we can close this recommendation.

In addition to determining FHWA's progress in addressing our recommendations, we also followed-up on whether action had been taken to address the suggestions we offered to help improve the overall effectiveness of FHWA's financial disclosure program. As you know, these suggestions included ensuring that (1) the agency date-of-receipt stamp is used on all reports, (2) OGE Form 450-As are properly filed, and (3) intermediate reviews are conducted prior to certifying confidential reports. We were pleased to learn that your office has taken appropriate steps to address each suggestion. We encourage you to be mindful of these issues during future filing cycles to help ensure the effectiveness of FHWA's financial disclosure program.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia C. Zemple". The signature is fluid and cursive, with a long horizontal stroke at the end.

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
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Washington, DC 20005-3917

December 20, 2011

Ann Gawalt  
Assistant Chief Counsel  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Ms. Gawalt:

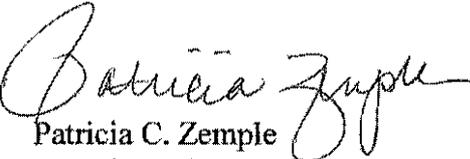
As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Federal Motor Carrier Safety Administration (FMCSA). Based on our findings, OGE recommended that the following improvements be made: (1) improve the timeliness of new entrant confidential filing; (2) develop written procedures that outline the process for collecting, reviewing, and evaluating financial disclosure reports; and (3) improve FMCSA's tracking system to aid in the timely collection, review, and certification of financial disclosure reports. Our report also offered several suggestions for program enhancement.

On June 1, 2011, we met with you and your staff to determine whether or not action had been taken to effect closure on the formal recommendations contained in our July 2010 report. Based on the results of our follow-up review, OGE has determined that FMCSA has satisfied all three recommendations. This letter confirms that all three recommendations are now closed.

In addition to discussing FMCSA's progress in addressing these recommendations, we also followed-up on whether action had been taken to address the suggestions we offered to help improve the overall effectiveness of FMCSA's financial disclosure program. As you know, these suggestions included ensuring that (1) SGE filers indicate their reporting status as "New Entrant" each year, (2) all reports are stamped with the date-of-receipt stamp, (3) incomplete reports are not certified, (4) DEO action on filing extensions are documented, and (5) FMCSA's master list of filers is continually updated. During our follow-up, we found that your office has taken appropriate steps to address each suggestion. We encourage you to be mindful of these issues during future filing cycles to help ensure the continued effectiveness of FMCSA's financial disclosure program.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

  
Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Michael T. Haley  
Deputy Ethics Official  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Haley:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Federal Railroad Administration (FRA). Based on our findings, OGE recommended that your office develop written procedures for administering FRA's public and confidential financial disclosure systems in accordance with the Ethics Act. We also suggested that your office continually monitor FRA's new entrant confidential filing process to ensure that the steps established to address new entrant filing are effective.

On May 31, 2011, we met with you and your staff to determine whether or not action was taken to effect closure on the open recommendation contained in our July 2010 report. Based on the results of our follow-up review, OGE has determined that FRA has satisfied the recommendation, and the recommendation is closed. We encourage you to keep these procedures updated in the future.

With respect to our suggestion on monitoring the timeliness of new entrant confidential filing, we were pleased to learn of the various actions that have been implemented since our program review to address this issue. These actions included:

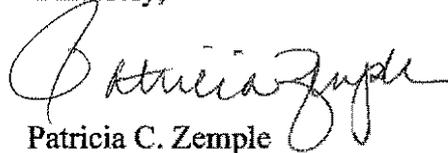
- adding a statement concerning new entrant confidential filing requirements to all FRA job announcements and to the entrance-on-duty letter sent to successful candidates,
- including an ethics sign-off form on the entrance-on-duty letter that describes all required new entrant ethics activities, and
- receiving quarterly spreadsheet listings of all new entrants from FRA's Office of Human Resources, as well as bi-weekly listings of FRA personnel changes, which include new hires who might be required to file a confidential report.

These steps, along with any prospective actions, should help to ensure more timely compliance by new entrants with filing requirements for the confidential reporting system. However, we encourage you to continually monitor and reevaluate these steps to ensure they operate as designed.

Michael T. Haley  
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Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia Zemple". The signature is written in a cursive style with a large initial "P".

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Scott A. Biehl  
Deputy Ethics Official  
Federal Transit Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Biehl:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Federal Transit Administration (FTA). Based on our findings, we recommended that your office take the following actions: (1) improve timeliness in new entrant confidential filing and (2) update FTA's written procedures for administering both the public and confidential financial disclosure system. Our report also offered several suggestions for program enhancement.

On June 7, 2011, we met with you and your staff to determine whether or not action was taken to effect closure on the two formal recommendations contained in our July 2010 report. Based on the results of our follow-up review, Recommendation 1 in the report will remain open pending further follow-up. Recommendation 2 is now closed.

Recommendation 1 directed FTA to improve the timeliness of new entrant confidential filing. During our visit we were pleased to learn of the various actions that have already been taken since our review to help improve timeliness of new entrant confidential filing. These actions include:

- meeting with FTA's Office of Administration to resolve issues regarding the universe of FTA employees who might be required to file a confidential report;
- establishing a renewed partnership with FTA's Office of Human Resources (OHR);
- receiving a bi-weekly listing prepared by OHR of all personnel changes, including new hires, departures, promotions, and reassignments within FTA; and
- using FTA's Operations and Staff Information System to also help identify positions that might be subject to the requirement to file a confidential report.

We believe these actions, along with any prospective actions, should help to ensure regulatory compliance with 5 CFR § 2634.903(b). Based on the results of our follow-up review, however; we will need to conduct additional follow-up before we can reasonably determine that these measures are effective. For example, during our June 7 visit we examined 25 new entrant confidential reports that were required to be filed in 2010 and 2011 and found the majority had

Scott A. Biehl

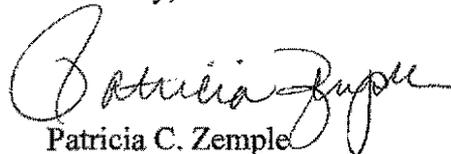
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been filed late. Realizing that identifying employees entering or transferring into a covered position can be a challenge for any confidential financial disclosure program, OGE will follow-up again six months from the date of this letter to determine whether we can close this recommendation.

In addition to determining FTA's progress in addressing our recommendations, we also followed-up on whether action had been taken to address the suggestions we offered to help improve the overall effectiveness of FTA's financial disclosure program. As you know, these suggestions included ensuring that (1) termination public reports are timely collected, (2) filers do not digitally sign their confidential reports, (3) incomplete reports are not certified, and (4) non-filers do not file confidential reports. We were pleased to learn during our visit that your office has taken appropriate steps to address each suggestion. We encourage you to be mindful of these issues during future filing cycles to help ensure the effectiveness of FTA's financial disclosure program.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia Zemple".

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Rand Pixa  
Deputy Ethics Official  
Maritime Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Pixa:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Maritime Administration (MARAD). Based on our findings, OGE recommended that your office take the following actions: (1) change who certifies the public and certain confidential reports and (2) improve timeliness in new entrant confidential filing. Our report also offered one suggestion for program improvement.

On June 16, 2011, we met with you and your staff to determine whether or not action was taken to effect closure on the formal recommendations contained in our July 2010 report. Based on the results of our follow-up review, OGE has determined that MARAD has satisfied both recommendations. This letter confirms that both recommendations are now closed.

In addition to discussing your progress in addressing the aforementioned recommendations, we also followed-up with you on whether action had been taken to address our suggestion to ensure that MARAD's master list of filers is updated throughout the year, rather than annually. We were pleased to learn that your staff has incorporated this suggestion. Continuous updating of your master list should help account for new employees entering covered positions and employees leaving or transferring into covered positions.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

John Donaldson  
Deputy Ethics Official  
National Highway Transportation Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Donaldson:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the National Highway Transportation Safety Administration (NHTSA). Based on the results of our findings, OGE recommended that your office take the following actions: (1) improve timeliness in new entrant confidential filing; (2) develop a process for ensuring that all financial disclosure reports, especially public reports, are reviewed and certified timely; and (3) ensure the appropriate use of the OGE Optional Form 450-A. Our report also offered several suggestions for program improvement.

On June 8, 2011, we met with you and Dana Sade, a senior attorney on your staff, to determine whether or not action was taken to effect closure on the formal recommendations contained in our July 2010 report. Based on the results of our follow-up review, OGE determined that NHTSA has satisfied all four recommendations. This letter confirms that all four recommendations are now closed.

In addition to discussing NHTSA's progress in addressing these four recommendations, we also followed-up on whether action had been taken to address our suggestions. As you know, our report suggested that NHTSA ensure that (1) non-filers do not file confidential reports, (2) DEO action on filing extensions are documented, (3) incomplete reports are not certified, and (4) filers and reviewers are informed of over-reporting errors. We were pleased that your office not only has taken appropriate steps to address each suggestion, these suggestions have been reinforced under NHTSA's modified written procedures. We encourage you to be mindful of these issues during future filing cycles to help ensure the effectiveness of NHTSA's financial disclosure program.

John Donaldson  
Page 2

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,



Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Brian A. Dettelbach  
Deputy Ethics Official  
Office of Inspector General  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Dettelbach:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Office of Inspector General (OIG). Based on our findings, OGE recommended that your office modify its written procedures for administering the confidential financial disclosure system to ensure full compliance with the Ethics Act. Our report also offered several suggestions for program improvement.

On June 21, 2011, we met with Seth Kaufman, an Associate Counsel who serves as team leader for the OIG program, to determine whether or not action was taken to effect closure on the open recommendation contained in our July 2010 report. Based on the results of our follow-up review, OGE has determined that OIG has satisfied the recommendation, and the recommendation is closed.

In addition to discussing OIG's progress in addressing the recommendation, we also followed-up on whether action had been taken to address our suggestions. As you know, we suggested that OIG (1) continue to monitor the timeliness of new entrant confidential filing, (2) use the agency date-of-receipt stamp on all reports, and (3) ensure that OGE is concurrently notified of all referrals involving an alleged violation of a criminal conflict-of-interest statute to the Department of Justice. We were pleased that your office has taken appropriate steps to address each of these suggestions.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in cursive script that reads "Patricia C. Zemple".

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

William R. Register  
Deputy Ethics Official  
Office of the Secretary of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Mr. Register:

As part of our monitoring activities, the U.S. Office of Government Ethics' (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Office of the Secretary of Transportation (OST). Based on our findings, OGE recommended that OST take the following actions: (1) improve timeliness in new entrant confidential filing, (2) develop a process for ensuring that all financial disclosure reports are reviewed and certified timely, (3) use the agency date-of-receipt stamp on all financial disclosure reports, and (4) modify OST's written procedures for public financial disclosure systems. Our report also offered several suggestions for program improvement.

On June 22, 2011, we met with you and Tanique Anderson, Ethics Paralegal Specialist, to determine whether or not action was taken to effect closure on the formal recommendations contained in our July 2010 report. Based on the results of our follow-up review, OGE has determined that OST has satisfied all four recommendations. This letter confirms that all four recommendations are now closed.

In addition to discussing OST's progress in addressing these recommendations, we also followed-up on whether action had been taken to address the suggestions we offered to help improve the overall effectiveness of OST's financial disclosure program. As you know, these suggestions included ensuring that (1) filers are made aware of certain reporting errors and omissions and (2) the financial disclosure tracking system be improved. We were pleased to learn during our June 22 discussion that your office has taken appropriate steps to address each suggestion. We encourage you to be mindful of these issues during future filing cycles to help ensure the effectiveness of OST's financial disclosure program.

Thank you for your assistance during the follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia C. Zemple".

Patricia C. Zemple  
Associate Director



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 20, 2011

Ellen Partridge  
Chief Counsel  
Research and Innovative Technology Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Ms. Partridge:

As part of our monitoring activities, the U.S. Office of Government Ethics (OGE) issued a report on July 16, 2010, relating to its review of the financial disclosure program at the Research and Innovative Technology Administration (RITA). Based on our findings, we recommended that your office take the following actions: (1) develop a process in collaboration with the Volpe Center's Chief Counsel to ensure that new entrant confidential reports are collected and filed timely RITA-wide and (2) develop written procedures--to include operations at the Volpe Center--for administering both the public and confidential financial disclosure systems in accordance with the requirements of the Ethics Act. Our report also offered several suggestions for program enhancement.

On June 23, 2011, we met with Greg Winfree, now Acting RITA Administrator, and Robert Monniere to determine whether or not action was taken to effect closure on the two recommendations contained in our July 2010 report. Based on the results of our follow-up review, this letter confirms OGE's determination that Recommendation 1 will remain open pending further follow-up. Recommendation 2 is now closed.

Recommendation 1 directed RITA to develop a process in collaboration with the Volpe Center's Chief Counsel to ensure that new entrant confidential reports are collected and filed timely RITA-wide. During our visit we were pleased to learn of the various actions that have already been taken since our review to help improve timeliness of new entrant confidential filing. These actions include:

- receiving bi-weekly listings prepared by the RITA/Volpe Center's Human Resources Division (HRD) of all new hires,
- participating in HRD's biweekly orientations of new hires to help identify positions that might be required to file a confidential report, and
- working with the Volpe Center's Acquisition Management Division and supervisors to help identify filing positions.

Based on the results of our follow-up review, however, additional follow-up is needed before OGE can determine that these measures are effective and operating as designed. Specifically, as part of our follow-up work, we examined 12 new entrant confidential reports that were required to be filed in 2010 and 2011 and found that the majority of the reports had been filed late. Realizing that identifying employees entering or transferring into a covered position can be a challenge for any confidential financial disclosure program, OGE will follow-up again six months from the date of this letter to determine whether to close this recommendation.

In addition to discussing RITA's progress in addressing our formal recommendations, we also followed-up on whether action had been taken to address the suggestions we offered to help improve the overall effectiveness of RITA's financial disclosure program. As you know, these suggestions included ensuring that (1) RITA's master list of public filers is continually updated, (2) filers are aware of certain reporting errors and omissions, (3) reports are not certified when additional information is needed, (4) the agency date-of-receipt stamp is used on all reports, (5) timeliness of review can be determined at all times, (6) confidential reports are destroyed after 6 years, and (7) filers do not digitally sign their confidential reports. We were pleased to learn during our visit that your office--including the Volpe Center--has taken appropriate steps to address each suggestion. We encourage you and your staff to be mindful of these issues during future filing cycles to help ensure the effectiveness of RITA's financial disclosure program.

Thank you for your assistance during this follow-up process. If you have any questions, please contact David Meyers at (202) 482-9263 or you can contact me at (202) 482-9286.

Sincerely,



Patricia C. Zemple  
Associate Director