



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

March 14, 2012

Gwen Jones Kelley  
Designated Agency Ethics Official  
Social Security Administration  
Altmeyer Building, Room 617  
6401 Security Blvd.  
Baltimore, MD 21235

Dear Ms. Jones Kelley:

The United States Office of Government Ethics (OGE) recently conducted a follow-up review of the ethics program at the Social Security Administration (SSA) to determine whether the improvements recommended in our February 2011 report have been achieved.

At the time of OGE's initial review, SSA's financial disclosure system was not in compliance. Specifically, many financial disclosure reports did not meet the standards of completeness and were not timely certified. In addition, OGE found that many confidential financial disclosure reports were filed late. OGE recommended that Headquarters provide intermittent reviews of regional reports and provide recurrent training for regional reviewers.

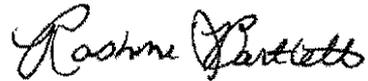
While SSA was unable to conduct review of regional reports due to budget constraints and staffing limitations, OGE found significant improvements in the technical sufficiency of both the public and confidential reports during the follow-up review. SSA provided in-depth financial disclosure report review training to all agency reviewers in January 2011, and intends to provide additional training beginning in September 2012. OGE also found that reports were generally certified timely.

OGE also found that annual confidential reports filed in 2011 were generally filed timely. However, some new entrant confidential reports were filed late. SSA is in the process of reviewing an electronic financial disclosure tracking system that will track filing, review and certification of financial disclosure reports as well as identify ethics officials of new entrant filers. SSA will begin testing this system in the next few months and anticipates that it will help ensure that new entrant filers are timely identified.

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Based on this information, we have determined that SSA has adequately implemented the recommendations in the February 2011 review report. As a result, OGE has closed the recommendations. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9317 if you require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Rashmi Bartlett".

Rashmi Bartlett  
Associate Director