

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



June 5, 2017

Tammy L. Kennedy
Chief Counsel, Southeast District (North) and
Designated Agency Ethics Official
Department of Veterans Affairs
3322 West End Avenue, Suite 509
Nashville, TN 37203

Dear Ms. Kennedy:

In September 2014, the United States Office of Government Ethics (OGE) issued a report on its review of the U.S. Department of Veterans Affairs (VA) ethics program. The September 2014 report included 22 recommendations for improvement. Six recommendations were addressed by VA during the course of the initial review and closed before the issuance of the September 2014 report. Sixteen recommendations were left open. OGE closed all but one of the remaining 16 recommendations during its May 2016 and January 2017 follow-up reviews. OGE recently conducted a third follow-up review to assess whether VA has taken action to resolve or sufficiently mitigate the deficiencies underlying the one remaining recommendation. The results of the follow-up review are summarized below:

	Recommendation	Agency Action and OGE Finding	Status
7	OGE recommends that VA ensure that employees required to file confidential financial disclosure reports file their reports before the filing deadline.	VA's Designated Agency Ethics Official (DAEO) sent a message to all senior leaders at VA. The message asked the senior leaders to remind employees of the February 15 th annual filing deadline and to take appropriate action, including disciplinary action, when notified by the Ethics Specialty Team (EST) of delinquent filers. Additionally, the EST collaborated with the Office of Human Resources Management to send a memorandum to all VA Human Resources offices that explained revisions to 5 C.F.R. part 2638. (The revisions require HR offices to notify the DAEO of all appointments to filing positions within 15 days.) Increased HR involvement in the new entrant filing process, combined with the support of VA senior leadership and the operational coordination of the EST, helped to significantly increase the timely filing of new entrant and annual reports. OGE reviewed data generated by the electronic confidential	Closed



		financial disclosure filing system used by VA and determined that 93% of annual reports were filed timely. OGE also reviewed a sample of 20 new entrant reports and found that 85% of the new entrant reports in the sample were filed timely.	
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I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance