



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

December 15, 2011

Rudy Sanchez
Designated Agency Ethics Official
Selective Service System
1515 Wilson Boulevard, 6th Floor
Arlington, Virginia 22209-2425

Dear Mr. Sanchez:

The United States Office of Government Ethics (OGE) recently conducted an on-site follow-up review of the ethics program at the Selective Service System (SSS) to determine whether the improvements recommended or suggested in our May 2011 report have been achieved.

During OGE's initial review of DSS' ethics program, OGE found weaknesses in the completion and review of public financial disclosure reports. Of the five public financial disclosure reports filed at SSS, three of the reports were found to be incomplete. The missing information was necessary to complete a conflict of interest determination. Financial disclosure files showed no evidence of follow-up or corrective action taken to ensure complete and accurate reporting. OGE recommended that "SSS ethics officials should ensure that public reports are complete and accurate before certification." OGE also suggested that the DAEO receive additional training in the review of financial disclosure reports and that SSS maintain records documenting the review of reports.

During the on-site follow-up review, OGE examined 3 public reports required to be filed in 2011. The reports were complete and in compliance with applicable requirements, providing the information necessary to allow the DAEO to conduct a conflict of interest analysis. OGE also saw documentation of the conflict of interest analyses which had been conducted. Additionally, the DAEO did receive additional training by taking OGE's online training for reviewers of public financial disclosure reports. Based on its examination of public financial disclosure reports, OGE is closing the recommendation in the May 2011 report. OGE considers the documentation of conflict of interest analyses and confirmation from the DAEO that he has received additional training to be responsive to our suggestions regarding the review of public reports. Therefore, OGE considers these matters closed as well.

OGE's initial review also found that SSS may have designated too many employees as confidential financial disclosure report filers. OGE's report suggested that SSS reevaluate the designation of confidential filers. During the on-site follow-up review, the DAEO stated that the review of positions designated for confidential filing was still underway and that decisions would be made before the 2012 annual confidential disclosure filing cycle. The ongoing review of

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designated positions is responsive to OGE's suggestion and; therefore, OGE considers the issue closed.

Based on our follow-up, and as noted, we have determined that SSS has adequately implemented the recommendation in the May 2011 review report. As a result, OGE has closed the recommendation. In addition, OGE is satisfied that SSS' actions regarding the suggestions are responsive and; therefore, considers those issues closed as well. 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