



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

April 15, 2004  
DO-04-005

MEMORANDUM

TO: Designated Agency Ethics Officials, General Counsels, and  
Inspectors General

FROM: Jack Covalleski  
Deputy Director for Agency Programs

SUBJECT: Program Plan of Agency Reviews for the Second Half of  
Calendar Year 2004

Attached for your information is the program plan of agency ethics reviews scheduled by the Office of Government Ethics (OGE) for the second half of calendar year 2004. We will attempt as much as possible to follow the schedule set forth in the attachment. Some of the agencies were listed in the previous program plan, but were not reviewed due to other priorities.

We will contact the Designated Agency Ethics Official (DAEO) or designee by telephone approximately one month prior to our entrance into the agency, followed by a letter of confirmation. Should there be a reason why you cannot receive us as scheduled, please call Ed Pratt, Associate Director for Program Reviews, at 202-482-9270, or Jerry Chaffinch, Senior Management Analyst of the Program Review Division, at 202-482-9221.

This year we will continue with our new program review procedures to evaluate agency ethics programs more effectively and to make better use of our time and yours. We will perform a pre-review of an agency's ethics program to determine how best to focus our review. This pre-review will include an examination of our internal documents filed by the agency, and prior agency review reports. It will also include discussions with the OGE desk officer, the agency's ethics officials and Office of the Inspector General representatives.

As we indicated in the program plans for calendar year 2003, new review steps were added to examine the agency's program to enforce the criminal conflict-of-interest statutes and the standards of conduct. We will be looking at the agency's systems for taking administrative action when an ethics matter referred to the Justice Department is declined for prosecution, or when violations of the standards of conduct have occurred. This review will include discussions with the Human Resource Office, the Office of Inspector General, and ethics officials. We are also continuing to look at ethics agreements more in-depth to determine whether screening mechanisms established to enforce recusals are effective.

In approximately nine agencies annually, we will survey agency employees to determine their opinion as to how effectively the ethics program is serving their needs and protecting the agency. We will report on the results of this survey to the Designated Agency Ethics Official at the start of our review. Because of the lead time required to prepare, conduct, and analyze these surveys, we will be contacting those selected agencies well in advance.

Our usual practice, once a review has been completed, is to send a report to the DAEO with recommendations for improving the program. We ask that the DAEO respond to our recommendations within 60 days as to the actions he/she has taken or plans to take. We do not send our reports to the Congress, but occasionally a Congressional committee will request a report of an agency under its jurisdiction. These requests are granted and the agency DAEO is informed that we have received such a request. Moreover, we do not routinely send copies of our reports to the news media, nor issue press releases concerning the reports. Periodically, we do release reports to the news media in response to Freedom of Information Act requests.

We are continuing to ask that you complete our Agency Program Review Evaluation form after you receive the report. Please take a few moments to provide us with feedback on the usefulness of our reviews and reports, and identify areas for improvement. Thank you for all the comments you have already given us; they have been extremely useful in modifying our review techniques.

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We hope that this memorandum answers some of your questions concerning our review process. Should you have any other questions, please call Mr. Pratt.

Attachment

**OFFICE OF GOVERNMENT ETHICS**

**JULY - DECEMBER 2004**

**PROGRAM PLAN OF AGENCY REVIEWS**

**PROGRAM REVIEW SCHEDULE**  
**JULY - SEPTEMBER 2004**

1. U. S. Parole Commission
2. Federal Mine Safety and Health Review Commission
3. Ft. McPherson
  - Garrison
  - U. S. Army Forces Command
  - Third US Army
4. Department of the Navy
  - Office of the Secretary of the Navy including the Undersecretary, four Assistant Secretaries, Office of the General Counsel, Chief of Naval Operations and the Vice Chief, and the Judge Advocate General (HQ central office)
  - Naval Sea Systems Command
5. Federal Retirement Thrift Investment Board
6. Office of Personnel Management
7. Federal Deposit Insurance Corporation
8. Food and Drug Administration
9. Export-Import Bank
10. Economic Research Service (Agriculture)

**PROGRAM REVIEW SCHEDULE  
OCTOBER - DECEMBER 2004**

1. Department of the Interior
  - Office of the Secretary
  - Minerals Management Service
  - Bureau of Reclamation
  - U. S. Geological Survey
2. International Boundary and Water Commission
3. Peace Corps
4. Armed Services Board of Contract Appeals
5. U. S. Arctic Research Commission
6. Department of Health and Human Services
  - Office of the Secretary
  - Administration on Aging
  - Administration for Children and Families
7. Defense Threat Reduction Agency
8. Department of Energy
9. Department of State
10. Foreign Claims Settlement Commission