

MEMORANDUM

March 4, 1998

To: Ethics File (3.1.6)

From: Ronald G. Haron
Associate General Counsel &
Designated Agency Ethics Officer

CC: T. Jeremy Gunn
Executive Director and
General Counsel

Subject: Procedures for Ethics Program in 1998

On February 18, 1998, I met with Ms. Jean Hoff of the Office of Government Ethics ("OGE"). Ms. Hoff reviewed our ethics files and spoke with me to ascertain whether we are fully complying with the rules and regulations of OGE. Ms. Hoff specifically suggested that we have formal, internal procedures in place with respect to: (1) filing of financial disclosure forms; (2) annual ethics training; and (3) semi-annual reports with respect to any travel payments in connection with Review Board work. Accordingly, set forth are 1998 procedures regarding these items:

A. Procedures for Filing of Financial Disclosure Forms

March 10, 1998 -- Provide notice to Review Board members that their confidential financial disclosure reports (SF-450's) are due by April 10, 1998. Enclose the SF-450 forms with the notice.

April 6, 1998 -- Deputy Director Thomas Samoluk files his termination public disclosure report. The Designated Agency Ethics Officer ("DAEO") reviews the report within 60 days.

April 10, 1998 -- Review Board members submit their financial disclosure reports, and . the DAEO reviews them within 60 days.

April 15, 1998 -- Provide notice to "public filers" that their financial disclosure reports (SF-278) are due on May 15, 1998. Enclose SF-278 forms with notice. At this time, the only public filers are T. Jeremy Gunn, Executive Director and General Counsel, and Ronald G. Haron, the DAEO.

May 15, 1978 -- T. Jeremy Gunn files his SF-278, and the DAEO reviews the Gunn report within 60

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days. The DAEO's report is submitted to OGE by September 15, 1998.

August 25, 1998 -- In view of the expiration of the agency's Congressional mandate on September 30, 1998, it is anticipated that termination reports will have to be filed by the two public filers (Executive Director Gunn and DAEO Haron) as of September 30. Accordingly, on August 25, provide notice that such termination reports are due by September 30. The reports will have to provide updated information for the period January 1, 1998 through September 30, 1998. Upon receipt of the reports, the DAEO should (a) review the Gunn report and (b) submit the DAEO's report to OGE.

OGE has advised that the confidential filers (the Review Board members and Tracy Shycoff, Associate Director for Administration) do not need to submit termination reports.

B. Procedures for Annual Training in 1998

For the 1998 calendar year, the following training program will be put into effect:

The staff and the Review Board members will receive a verbal briefing from a representative of OGE. The emphasis will be on issues that will be particularly pertinent to staff and Board members as the Review Board closes its operations by September 30, 1998, including post-employment restrictions, restrictions on seeking other employment, and restrictions on outside activities.

With respect to any new employees that may be hired, the DAEO will circulate copies of OGE's summary of Standards of Ethical Conduct and the OGE pamphlet "Do It Right" upon commencement of their employment.

C. Procedures for Filing Semi-Annual Reports Regarding Travel Payments

May 1, 1998 -- Send out notice that travel payments received in connection with Review Board work must be reported for the period October 1, 1997 to March 31, 1998.

May 31, 1998 -- File report with OGE for the October 1997 to March 1998 reporting period.

September 1, 1998 -- Send out notice that travel payments received in connection with Review Board work must be reported for the period April 1, 1998 to September 30, 1998.

September 30, 1998 --File report with OGE for the April 1998 to September 1998 reporting period.

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