For these reasons, and in the interest of transparency and public understanding, NMFS and NOAA GC will continue to communicate the existing policies and procedures concerning financial disclosure and recusal to all NMFS employees, Council members, Council staff, and the public. Consistent with this, NOAA GC will conduct an annual briefing for the Councils on financial disclosure and recusal requirements. This includes a briefing on the policy and procedural guidance developed to respond to the OIG recommendations. Any briefings or trainings, either coordinated by NOAA GC or OSF, will address completing financial disclosure forms, the recusal process, and discuss penalties.

## 5. <u>Public Online Access to Regional Recusal Determination Procedures and Recusal Determinations</u>

In coordination with each NOAA GC Regional Section, each NMFS Regional Office will create a place on its regional website where the public can access the region's Regional Recusal Determination Procedures, any written recusal determinations, and any appeals of recusal determinations. Starting on the effective date of this procedural directive, each NOAA GC Regional Section should provide its NMFS Regional Office website administrator with electronic copies of the Regional Recusal Determination Procedures and all written recusal determinations and appeal decisions as they become available. As time and resources permit, any written recusal determinations and appeal decisions issued prior to the effective date of this procedural directive should be added to the NMFS Regional Office website. All written recusal determinations and appeal decisions made publicly available will protect from disclosure all confidential and protected information.

OSF will maintain a place on its website that provides links to all of the NMFS Regional Office websites and serves as a central source for locating all Regional Recusal Determination Procedures, any written recusal determinations, and any appeal decisions.