

## ETHICS PROGRAM INSPECTION REPORT

Agency: Commission for the Preservation of America's Heritage Aboard  
(Commission)

Report No.: 24-571

Date: September 24, 2024

Period Covered by Review: January 1, 2023 through December 31, 2023

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest  
in the Executive Branch

1.0	AGENCY DATA		
	EMPLOYEES		
1.1	Number of full-time agency employees.	2	
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See comment below	
1.3	Number of non-PAS public financial disclosure reports required to be filed.	1	
1.4	Number of confidential financial disclosure reports required to be filed.	See comment below	
	ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	Executive Director	
1.6	Grade level of DAEO.	GS-15	
1.7	Title of Alternate DAEO (ADAEO).	Administrative Officer	
1.8	Grade level of ADAEO.	GS-9	
1.9	Title of the primary, day-to-day ethics program administrator.	Executive Director	
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-15	
1.11	Current number of full-time ethics officials.	0	
1.12	Current number of part-time ethics officials.	2	
1.13	Number of reporting levels between the DAEO and the agency head.	1	
	COMMENTS		
	<p>(1.2) The Commission does not have any PAS officials. The Commission is comprised of 21 Commission Members appointed by the President. Of these, seven are appointed after consultation with the Speaker of the House of Representatives, and seven are appointed after consultation with the President Pro Tempore of the Senate, with three of each seven traditionally recommended by the minority leaders of each house of the Congress. The President designates a Chair from among the members. Commission Members are appointed for three-year terms but continue to serve until they are replaced. They do not receive payment for their service. The Chair serves as the head of the agency, directing its operations. At the time of OGE's inspection, one Commission Member position was vacant. (see, SPECIAL GOVERNMENT EMPLOYEES section at 10.0 below)</p> <p>(1.3) The Commission's Executive Director serves as the agency's DAEO. The Executive Director/DAEO position is the only position whose incumbent is required to file a public financial disclosure report. The Executive Director/DAEO's report is initially reviewed and certified by the agency's ADAEO and is then forwarded to OGE for final review and certification.</p> <p>(1.4) The Commission has historically not had any positions that meet the criteria for requiring the incumbent to file a confidential financial disclosure report. Additionally, the agency did not have any positions subject to confidential filing during the period covered by this inspection.</p>		

2.0	LEADERSHIP			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. See 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. See 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	None			

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3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)							
COMPLIANCE REQUIREMENTS				Yes	No	N/A	
The agency has written policies and procedures in place governing: <i>See 5 U.S.C. app. IV, § 402(d)(1).</i>							
3.1	• Collection of public financial disclosure reports.				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	• Review/evaluation of public financial disclosure reports.				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	• Public availability of public financial disclosure reports.				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.4	The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports.				<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.5	Public financial disclosure reports are securely maintained. <i>See OGE/GOVT-1.</i>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.6	Public financial disclosure reports are retained in accordance with the retention requirements. <i>See 5 C.F.R. § 2634.603(g)(1).</i>				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3.7	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See 5 C.F.R. § 2638.105(a)(1).</i>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.8	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See 5 C.F.R. § 2638.105(a)(2).</i>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS					%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See 5 C.F.R. § 2634.201(b).</i>				N/A		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See 5 C.F.R. § 2634.201(a).</i>				100%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See 5 C.F.R. § 2634.201(e).</i>				N/A		
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>				100%		
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>				100%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See 5 C.F.R. § 2634.201(a).</i>				N/A		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See 5 C.F.R. § 2634.201(e).</i>				N/A		
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>				N/A		
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>				N/A		
COMMENTS							
<p>(3.4, 3.10) The Executive Director/DAEO is the Commission's only public filer. OGE examined the DAEO annual report and found that it had been filed and reviewed timely.</p> <p>(3.6) OGE identified two public reports dating back to 2017 and 2018 that had not yet been destroyed at the time of examination. OGE informed the DAEO to destroy all public reports found to exceed the six-year retention period in accordance with 5 C.F.R. § 2634.603(g)(1).</p> <p>(3.7 – 3.8) The requirement for human resources officials to notify the DAEO of appointments to or terminations from positions that require incumbents to file public financial disclosure reports is intended to ensure the DAEO can timely advise employees of relevant filing requirements. The Executive Director/DAEO is the Commission's only public financial disclosure report filer and the Administrative Officer/ADAEO would be aware of a pending appointment to, or termination from, this position. The ADAEO would also be responsible</p>							

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for notifying OGE of this appointment as part of the hiring process of the Executive Director. Therefore, formal notification from human resources officials is not necessary to ensure the timely notification of the filing requirement.

**4.0 CONFIDENTIAL FINANCIAL DISCLOSURE****COMPLIANCE REQUIREMENTS**

Yes

No

N/A

The agency has written policies and procedures in place governing: *See* 5 U.S.C app. IV, § 402(d)(1).

4.1	• Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	• Review/evaluation of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See</i> 5 C.F.R. § 2634.905(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.6	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**DATA ANALYSIS**

%

4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	See comment below
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	See comment below
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	See comment below
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	See comment below

**COMMENTS**

(4.1 - 4.2) Historically there have been no full-time employees required to file confidential financial disclosure reports at the Commission. As a result, written procedures governing the confidential financial disclosure system have not been needed. At the time of this inspection, there were no full-time positions subject to confidential filing. Written procedures have been developed for Commission members who serve as special Government employees (SGEs) and are required to file confidential reports.

(4.3 – 4.4) The Commission uses the Intelliworx Financial Disclosure System (FDonline), an electronic financial disclosure reporting system (e-filing), to collect, review, and retain SGE reports filed by Commission members.

(4.5) The Commission does not have an OGE-approved alternative confidential financial disclosure report.

(4.7 – 4.10) See, SPECIAL GOVERNMENT EMPLOYEES section at 10.0 below.

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COMPLIANCE REQUIREMENTS		Yes	No	N/A
Written offers of employment for positions covered by the Standards of Conduct provide: <i>See 5 C.F.R. § 2638.303.</i>				
5.1	• A statement regarding the agency's commitment to government ethics.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.5	• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See 5 C.F.R. § 2638.303(c).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.303(c).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.8	The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See 5 C.F.R. § 2638.303.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS				
(5.1 – 5.5 and 5.8) The Commission did not have any new employees during the inspection period.				
(5.6-5.7) The Commission currently has two full-time staff employees. The most recent new hire was in 2020, and the Executive Director/DAEO is involved in all personnel actions. Although OGE reviewed a draft notification template that included all the required content as per § 2638.303, formal written procedures for issuing notices to prospective employees have not been needed. OGE provided sample language that the Executive Director/DAEO will use to satisfy the written procedure requirement.				

**6.0 NOTICES TO NEW SUPERVISORS**

COMPLIANCE REQUIREMENTS		Yes	No	N/A
The agency must provide each employee upon initial appointment to a supervisory position with: <i>See 5 C.F.R. § 2638.306.</i>				
6.1	• Contact information for the agency's ethics office.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See 5 C.F.R. § 2638.306(d).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.306(d).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.7	The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See 5 C.F.R. § 2638.306(b).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS				
(6.1 - 6.4 and 6.7) The Commission has only one employee with supervisory duties, the Executive Director/DAEO, who has been with the agency for several years. No appointments to supervisory positions were made during the period covered by the inspection.				

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(6.5 – 6.6) In the event of a vacancy in the Executive Director/DAEO position, the Administrative Officer/ADAEO would be aware of the pending appointment to, or termination from, this position. The ADAEO would also notify OGE of this appointment as part of the Executive Director's hiring process. Therefore, formal written procedures for issuing notices to new supervisors have not been needed. OGE provided sample language that the Executive Director/DAEO will adapt to help fully satisfy the written procedure requirement.

**7.0 INITIAL ETHICS TRAINING****COMPLIANCE REQUIREMENTS**

Yes

No

N/A

Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. *See 5 C.F.R. § 2638.304.*

7.1 The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. *See 5 C.F.R. § 2638.304(e)(1).*

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7.2 The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. *See 5 C.F.R. § 2638.304(e)(2).*

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7.3 The agency has established written procedures for initial ethics training. *See 5 C.F.R. § 2638.304(f).*

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7.4 The agency's written procedures are reviewed by the DAEO each year. *See 5 C.F.R. § 2638.304(f).*

☐☒☐**DATA ANALYSIS**

%

7.5 Percentage of new employees who received initial ethics training. *See 5 C.F.R. § 2638.304.*

N/A

7.6 Percentage of new employees who received initial ethics training within three months of appointment. *See 5 C.F.R. § 2638.304(b).*

N/A

**COMMENTS**

(7.1 - 7.2 and 7.5-7.6) The Commission had no new career employees during the period covered by the inspection. As a result, initial ethics training was not provided, and OGE did not examine any training material.

(7.3 - 7.4) OGE provided sample language that the Executive Director/DAEO will adapt to help fully satisfy the written procedure requirement.

**8.0 ANNUAL ETHICS TRAINING****COMPLIANCE REQUIREMENTS**

Yes

No

N/A

Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. *See 5 C.F.R. §§ 2638.307 and 2638.308.*

8.1 The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. *See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).*

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8.2 The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. *See 5 C.F.R. § 2638.307(e)(2) and 2638.308(e)(2).*

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8.3 The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. *See 5 C.F.R. §§ 2638.307(d) and 2638.308(e).*

☐☐☒

8.4 The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. *See 5 C.F.R. §§ 2638.307(f) and 2638.308(g).*

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8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DATA ANALYSIS		Training Format		
		Live	Interactive	
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a).				
8.6	• Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A	
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	N/A	
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	N/A	N/A	
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a)(d).				
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	N/A	N/A	
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	See comment below	See Comment below	
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A	
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	N/A	N/A	
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	See comment below	See comment below	
COMMENTS				
<p>(8.1 – 8.5) The DAEO is the only covered employee required to receive annual ethics training. The DAEO is presumed to have met the annual training requirement through routine performance of her duties as DAEO.</p> <p>(8.6) The Commission does not have any Executive Level I or II positions/employees.</p> <p>(8.10) See, SPECIAL GOVERNMENT EMPLOYEES section at 10.0 below</p> <p>(8.7 - 8.9 and 8.11 – 8.12) The Commission does not have employees in these categories.</p> <p>(8.13) The Administrative Officer/ADAEO is presumed to have met the annual training requirement through the routine performance of her duties as ADAEO. OGE was informed that the ADAEO has taken part in ethics training offered to Executive Branch ethics officials by OGE.</p>				

**9.0 ETHICS ADVICE AND COUNSELING**

COMPLIANCE REQUIREMENT		Yes	No	N/A
9.1	Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS				
(9.1) Written ethics counseling was not provided to Council employees during the period covered by the inspection.				

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10.1	Number of SGEs	20
	<b>DATA ANALYSIS</b>	<b>%</b>
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	70%
10.3	Percentage of sampled reports reviewed within 60 days of receipt <i>See</i> 5 C.F.R. § 2634.605(a).	100%
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%

	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Required ethics training must be provided to each SGE. <i>See</i> 5 C.F.R. §§ 2638.304 and 2638.307.			
10.5	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.6	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>DATA ANALYSIS</b>	<b>%</b>		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	See comment below		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	See comment below		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	See comment below		

**COMMENTS**

(10.1) As previously noted, the Commission is comprised of 21 Commission members appointed by the President. Members are appointed for three-year terms but continue to serve until they are replaced. They are not paid for their service. Commission members are responsible for establishing the agency's strategic direction and are classified as special Government employees (SGEs). At the time of OGE's examination, one Commission Member position was vacant.

(10.2) OGE examined 20 confidential reports that were required to be filed in 2023 by Commission members. Fourteen of the 20 confidential reports OGE examined were submitted timely while six were submitted late (30%). Timeliness was based on the Commission's established March 15<sup>th</sup> date of collection for SGE reports. Based on this finding OGE strongly suggests that the Commission establish safeguards to ensure that all SGEs file all required financial disclosure reports in a timely manner.

OGE also identified that all but three reports examined indicated the reporting status as "New Entrant," as required by 5 C.F.R. § 2634.903(b). OGE notes that this is an important distinction, because SGEs do not file incumbent confidential reports. Instead, they are required to file new entrant reports each year. New entrant reports cover a different reporting period than an annual report does. Moreover, a new entrant filer, unlike an annual filer, does not have to report gifts or travel reimbursements. OGE recommends that, going forward, ethics officials ensure that all SGE members file only new entrant reports each year.

(10.5) The Executive Director/DAEO utilizes ethics training material developed by the White House for political appointees and adapts it for Commission members. The Commission holds biannual meetings, and the DAEO ensures that ethics discussions are scheduled during each meeting. OGE could not fully evaluate the video training presentation used during the inspection period because it was no longer available for viewing. The DAEO mentioned that before its removal, Commission members were required to watch the video before signing their



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in the Executive Branch

ethics training certification. OGE suggests that the Executive Director/DAEO make certain to highlight each of the four topics through discussion questions or summary statements during the meetings to ensure that each concept is addressed in future trainings.

(10.7-10.9) Based on the SGE training tracking document provided to OGE as part of this inspection, 20 of the 21 SGEs received the required ethics training during the period of inspection. OGE could not determine from the tracking document whether the Chair of the Commission completed the training. Of the 20 that was documented as having received the training in 2023, 11 did not complete the annual training requirement by the end of 2023. Instead, they completed the training for 2023 in calendar year 2024. OGE reminds ethics officials that these SGEs are still expected to complete their 2024 training in calendar year 2023.

### RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	3.6	<u>RECOMMENDATION:</u> Ensure public financial disclosure reports exceeding the six-year retention period are destroyed as required by 5 C.F.R. § 2634.603(g)(1). <u>AGENCY RESPONSE:</u> USCPAHA agrees with this recommendation and will complete the recommendation upon receipt of this report.	Upon issuance of this report
2	5.6	<u>RECOMMENDATION:</u> Establish written procedures for issuing notices to prospective employees. Ensure that these procedures include the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c). <u>AGENCY RESPONSE:</u> USCPAHA agrees with this recommendation and will complete this by the compliance due date.	November 2024
3	7.3	<u>RECOMMENDATION:</u> Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f). <u>AGENCY RESPONSE:</u> USCPAHA agrees with this recommendation and will complete this by the compliance due date.	November 2024
4	10.2	<u>RECOMMENDATION:</u> Establish safeguards to ensure that all SGE Commission members file their confidential financial disclosure reports timely. <u>AGENCY RESPONSE:</u> USCPAHA agrees with this recommendation and will complete this by the compliance due date. USCPAHA also welcomes guidance from OGE on how to encourage SGE Commission Members to comply with due dates and what penalties can be levied to ensure compliance.	March 2025
5	10.2	<u>RECOMMENDATION:</u> Ensure that all SGE Commission members indicate their reporting status on the first page of the confidential report as "New Entrant" in accordance with 5 CFR § 2634.903(b). <u>AGENCY RESPONSE:</u> USCPAHA agrees with this recommendation and will complete this by the compliance due date.	March 2025