

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Denali Commission (The Commission)

Report No.: 22-34I

Date: May 31, 2022

Period Covered by Review: January 1, 2021 through December 31, 2021

**UNITED STATES OFFICE OF  
GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch

1.0 AGENCY DATA		
<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.	14
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	0
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.	4
<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.6	Grade level of DAEO.	GS-15
1.7	Title of Alternate DAEO (ADAEO).	Federal Co-Chairperson
1.8	Grade level of ADAEO.	Level IV Executive Schedule
1.9	Title of the primary, day-to-day ethics program administrator.	General Counsel
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
<b>COMMENTS</b>		
<p>(1.2) The Commission was established to deliver federal government services in rural Alaskan communities, including job training and economic development. The Secretary of Commerce appoints the Commission's seven members, six of whom are selected from Alaska-based organizations specified by the Denali Commission Act of 1998 (the Act). The seventh member is the Federal Co-chairperson, also appointed by the Secretary of Commerce under criteria specified by the Act.</p> <p>The Federal Co-chairperson is a Department of Commerce employee who serves a four-year term and may be reappointed while the remaining members are appointed for the life of the Commission and do not hold federal employee status under the Act.</p> <p>(1.3) The Commission's DAEO position is the only position whose incumbent is required to file a financial disclosure report.</p> <p>(1.12) At the start of OGE's inspection the Commission did not have an ADAEO. During the course of the inspection the Federal Co-chairperson, who files his public financial disclosure report with the Department of Commerce, was assigned the Commission's ADAEO.</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"/>
<b>COMMENTS</b>						
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</i> 5 U.S.C. app. IV, § 402(d)(1).					
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</i> OGE/GOVT-1.	<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</i> 5 C.F.R. § 2634.603(g)(1).	<input checked="" type="checkbox"/>	<input 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</i> 5 C.F.R. § 2638.105(a)(1).	<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</i> 5 C.F.R. § 2638.105(a)(2).	<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</i> 5 C.F.R. § 2634.201(b).	N/A			
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%			
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A			
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%			
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%			
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	N/A			
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A			
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A			
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A			
COMMENTS					
(3.4) The Commission did not have any employees subject to the late filing fee during the period covered by the inspection.					
(3.9) No new entrant reports were required to be filed during the period covered by the inspection.					
(3.11) No termination reports were required to be filed during the period covered by inspection.					
(3.14 – 3.17) The Commission has no PAS positions.					

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in the Executive Branch**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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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).	0%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	0%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%
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).	100%

**COMMENTS**

(4.7) One new entrant report was required to be filed during the period covered by the inspection. Ethics officials allowed the filer to wait four months after assuming their position to file the report. This was to allow the date of filing to roughly coincide with the due date for annual confidential financial disclosure reports. Ethics officials are reminded that statutory and regulatory requirements are not subject to change based on what is administratively convenient.

(4.8) Five annual reports were required to be filed during the period covered by the inspection. All five reports were filed more than 50 days beyond the due date and none of the filers received an extension. Additionally, four of the five filers submitted their reports using OGE Form 450A. The OGE Form 450A was a certificate of no new interests which filers were allowed to use for up to three years if they could certify that there had been no change in their reportable interests. OGE withdrew authorization to use OGE Form 450A in 2019. During the course of the inspection, the Commission collected OGE Form 450 reports from three of the filers. The fourth filer had retired from the Commission.

**5.0 NOTICES TO PROSPECTIVE EMPLOYEES****COMPLIANCE REQUIREMENTS****Yes****No****N/A**Written offers of employment for positions covered by the Standards of Conduct provide: *See* 5 C.F.R. § 2638.303.

5.1	• A statement regarding the agency's commitment to government ethics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	<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</i> 5 C.F.R. § 2638.303.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
<p>(5.7) The DAEO stated that he does not review the written procedures annually because the Commission uses the Department of Treasury's (Treasury) human resources services, which is responsible for ensuring notices comply with legal requirements. OGE reminds the DAEO that, even though the function has been outsourced, he remains responsible for ensuring that the Commission's ethics program meets all applicable requirements.</p> <p>OGE regulations require the DAEO to review the written procedures annually. <i>See</i> 5 C.F.R. § 2638.303(c). OGE therefore recommends that the Commission DAEO perform annual reviews of the agency's written procedures for issuing required notices to prospective employees. (The requirement for written procedures is largely predicated on the need to ensure continuity in the event an agency's experienced ethics officials are unavailable to administer the ethics program. Therefore, the Commission's written procedures should note that the function is outsourced to Treasury, provide instructions for contacting the appropriate staff within the Department of the Treasury, and explain how to access the contract/agreement between the Commission and Treasury.)</p>				

<b>6.0</b>	<b>NOTICES TO NEW SUPERVISORS</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	The agency must provide each employee upon initial appointment to a supervisory position with: <i>See</i> 5 C.F.R. § 2638.306.			
6.1	• Contact information for the agency's ethics office.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	<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</i> 5 C.F.R. § 2638.306(b).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
<p>(6.1 – 6.4) The Commission hired one supervisory employee during the period covered by the inspection. However the notice provided to the new supervisor did not include the information required by 5 C.F.R. § 2638.306. According to the DAEO the Commission uses the Department of Treasury's human resources services, which is responsible for ensuring notices comply with legal requirements. OGE reminds the DAEO that, even though the function has been outsourced, he remains responsible for ensuring that the Commission's ethics program meets all applicable requirements. The DAEO is inquiring why the notices did not include the required information and OGE recommends that the Denali Commission ensure that all notices to new supervisors include the information required by 5 C.F.R. § 2638.306.</p> <p>(6.6) The DAEO stated that he does not review the written procedures annually for the same reason that the DAEO does not review the written procedures for notices to new employees, as discussed in the comments for row 5.7 above. OGE regulations however require the DAEO to review the written procedures annually. <i>See</i> 5 C.F.R. § 2638.306. OGE therefore recommends that the Denali Commission DAEO perform annual reviews of the agency's written procedures for notices to new supervisors. (The requirement for written procedures is largely predicated on the need to ensure continuity in the event an agency's experienced ethics officials are unavailable to administer the ethics program. Therefore the Commission's written procedures should note that the function is outsourced to Treasury, provide instructions for contacting the appropriate staff within the Department of the Treasury, and explain how to access the contract/agreement between the Commission and Treasury.)</p>				

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**UNITED STATES OFFICE OF  
GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch**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).*☒☐☐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).*☐☒☐7.3 The agency has established written procedures for initial ethics training. *See 5 C.F.R. § 2638.304(f).*☐☒☐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.*

100%

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

0%

**COMMENTS**

(7.2) The Commission did not provide new employees written material containing either a summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency. OGE provided the Commission with a sample document containing a summary of the Standards of Conduct for distribution to the Commission's new employees.

(7.3) The Commission's written procedures initially provided to OGE did not contain procedures for initial ethics training. During the course of the inspection the procedures were updated to include procedures for initial ethics training.

(7.6) The Commission had one new hire during the period covered by the inspection. While the employee was provided ethics training, the training was provided eight days beyond the three month deadline. OGE suggests the Commission consider adopting a policy that new employees receive initial ethics training when they in process.

**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).*☒☐☐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. § 2638.304(e)(2).*☐☒☐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).*☒☐☐

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8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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"/>		
<b>DATA ANALYSIS</b>		<b>Training Format</b>				
		<b>Live</b>	<b>Interactive</b>			
	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).	100%				
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A			
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).	N/A	N/A			
<b>COMMENTS</b>						
(8.2) The Commission did not provide new employees written material containing either a summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency. OGE provided the Commission with a sample document containing a summary of the Standards of Conduct for distribution to the Commission's new employees.						
(8.5 – 8.8) The Commission did not employ any PAS or SES employees during the period covered by the inspection.						
(8.10 – 8.13) The Commission did not have any employees in the categories listed in rows 8.10 through 8.13.						

**9.0 ETHICS ADVICE AND COUNSELING**

	<b>COMPLIANCE REQUIREMENT</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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"/>
<b>COMMENTS</b>				
(9.1) The Commission's DAEO did not provide written counseling in 2021.				

**10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS**

<b>Confidential Financial Disclosure</b>				
10.1	Number of SGEs serving on Advisory Committees and Boards.	N/A		
	<b>DATA ANALYSIS</b>	<b>%</b>		

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10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	N/A
10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A

**Ethics Training**

	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Required ethics training must be provided to each SGE. See 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. See 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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. See 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. See 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. See 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. See 5 C.F.R. § 2638.307(d)(2).	N/A		
	COMMENTS			
	(10.1-10.9) The Commission has no SGE positions.			

**ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION**

<b>Element</b>	<b>ISSUE</b>
5.7	<p><u>ISSUE:</u> The Commission DAEO did not review the written procedures for Notices to Prospective Employees annually because the Denali Commission utilizes the Department of Treasury's human resources services.</p> <p><u>AGENCY RESPONSE:</u> The Commission updated its written procedures to specify that the DAEO review the written procedures annually.</p>
6.6	<p><u>ISSUE:</u> The Commission DAEO did not review the written procedures for Notices to New Supervisors annually because the Denali Commission uses the Department of Treasury's human resources services.</p> <p><u>AGENCY RESPONSE:</u> The Commission updated its written procedures to specify that the DAEO review the written procedures annually.</p>
7.3	<p><u>ISSUE:</u> The Commission's written procedures initially provided to OGE did not contain procedures for initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> During the course of the inspection the procedures were updated to include procedures for initial ethics training.</p>



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RECOMMENDATIONS			
#	Element	RECOMMENDATION	Compliance Due
1	4.7, 4.8	<u>RECOMMENDATION:</u> Ensure timely filing of confidential financial disclosure reports.	
2	4.8	<u>RECOMMENDATION:</u> Ensure all confidential filers use the correct form, OGE Form.	
3	5.7	<u>RECOMMENDATION:</u> Conduct annual DAEO reviews of the Commission's written procedures for Notices to Prospective Employees.	
4	6.1 – 6.4	<u>RECOMMENDATION:</u> Ensure that Notices to New Supervisors includes all information required by 5 C.F.R. § 2638.306.	
5	6.6	<u>RECOMMENDATION:</u> Conduct annual DAEO reviews of the Commission's written procedures for Notices to New Supervisors.	
6	7.2, 8.2	<u>RECOMMENDATION:</u> Provide written materials required by 5 C.F.R. § 2638.304(e)(2) to employees receiving ethics training.	