

**ETHICS PROGRAM INSPECTION REPORT**

Agency: National Capital Planning Commission

Report No.: 25-28I

Date: January 15, 2025

Period Covered by Review: January 1, 2024 through December 31, 2024

**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.	32	
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.	3	
1.4	Number of confidential financial disclosure reports required to be filed.	10	
	<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel & Secretariat	
1.6	Grade level of DAEO.	GS-15	
1.7	Title of Alternate DAEO (ADAEO).	Director, Office of Administration	
1.8	Grade level of ADAEO.	GS-15	
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.	2	
1.12	Current number of part-time ethics officials.	0	
1.13	Number of reporting levels between the DAEO and the agency head.	2	
	<b>COMMENTS</b>		
	None.		

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

3.0	PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	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"/>

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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).	100%		
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).	100%		
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).	25%		
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).	25%		
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				
<p>3.4: The National Capitol Planning Commission (NCPC) did not have any public reports subject to the late filing fee during the period covered by the inspection.</p> <p>3.12-3.13: NCPC had a total of four public reports required to be filed in 2024. Of the four, only one report was reviewed and certified timely. OGE did not receive the report with review and certification signatures for the newly appointed DAEO. Additionally, the annual and termination reports for the outgoing DAEO did not have signatures and dates confirming the review and certification of the reports. As a result, OGE could not verify whether these three reports were appropriately reviewed and certified. Proper review and certification of financial disclosure reports are essential to ensure that filing employees are free of financial conflicts. Additionally, documentation of such review and certification through dated review signatures are equally essential to demonstrate that agency ethics officials have conducted proper reviews of executive branch employee financial disclosure reports.</p> <p>3.14-3.17: NCPC does not employ any PAS officials.</p>				

<b>4.0</b>	<b>CONFIDENTIAL FINANCIAL DISCLOSURE</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	The agency has written policies and procedures in place governing: <i>See</i> 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"/>

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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"/>
	<b>DATA ANALYSIS</b>	<b>%</b>		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	<b>N/A</b>		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	<b>40%</b>		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	<b>90%</b>		
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).	<b>90%</b>		
	<b>COMMENTS</b>			
	4.5: NCPC does not have an OGE-approved alternative public financial disclosure system. 4.7: NCPC did not hire any new confidential filers during the period covered by the inspection. 4.8: NCPC had ten employees required to file annual confidential financial disclosure reports in 2024. Five of the ten required reports were filed after the due date. NCPC could not provide evidence that extensions were provided for these late filings. Additionally, one confidential financial disclosure report did not include the signatures of the filer or the reviewing official. OGE therefore could not verify that this report was filed, reviewed and certified timely. OGE reiterates its comment from the public financial disclosure section about the importance of proper review, certification and the documentation of such review and certification by agency ethics officials.			

<b>5.0</b>	<b>NOTICES TO PROSPECTIVE EMPLOYEES</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303.			
5.1	<ul style="list-style-type: none"><li>A statement regarding the agency's commitment to government ethics.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"><li>Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"><li>Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"><li>Where applicable, notice of the time frame for completing initial ethics training.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"><li>Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input 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>				
None.				

<b>6.0</b>	<b>NOTICES TO NEW SUPERVISORS</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>

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	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	<ul style="list-style-type: none"><li>Contact information for the agency’s ethics office.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"><li>The text of 5 C.F.R. § 2638.103.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none"><li>A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.</li></ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"><li>Other information the DAEO deems necessary.</li></ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
	None.			

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. <i>See</i> 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. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	The agency’s written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	100%		
	COMMENTS			
	7.1: NCPC’s initial ethics training addressed concepts related to conflicts of interests and gifts, but not impartiality or misuse of position.			

<b>8.0</b>	<b>ANNUAL ETHICS TRAINING</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See</i> 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. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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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. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
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	<ul style="list-style-type: none"><li>Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).</li></ul>	N/A	N/A	
8.7	<ul style="list-style-type: none"><li>Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).</li></ul>	N/A	N/A	
8.8	<ul style="list-style-type: none"><li>SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).</li></ul>	100%	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	<ul style="list-style-type: none"><li>Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).</li></ul>	100%	N/A	
8.10	<ul style="list-style-type: none"><li>Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).</li></ul>	N/A	N/A	
8.11	<ul style="list-style-type: none"><li>Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).</li></ul>	N/A	N/A	
8.12	<ul style="list-style-type: none"><li>Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).</li></ul>	N/A	N/A	
8.13	<ul style="list-style-type: none"><li>Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).</li></ul>	N/A	N/A	
COMMENTS				
	8.1: NCPC's annual ethics training presentation did not include topics related to misuse of position and gifts. 8.5-8.7: NCPC does not employ any PAS officials. 8.9-8.13: NCPC does not have employees that fall into these categories.			

9.0	<b>ETHICS ADVICE AND COUNSELING</b>			
	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>COMMENTS</b>			
	None.			

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

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10.1	Number of SGEs serving on Advisory Committees and Boards.	5
	<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).	<b>40%</b>
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).	<b>20%</b>
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	<b>20%</b>

**Ethics Training**

	<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 checked="" 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.	<b>N/A</b>		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	<b>N/A</b>		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	<b>40%</b>		

**COMMENTS**

10.1: At NCPC, three of its commissioners are appointed by the President of the United States, two are appointed by the Mayor of the District of Columbia while seven serve in an Ex officio capacity. Of these, the three appointed by the President and the two appointed by the Mayor are SGEs. The Presidential appointees serve six-year terms while the Mayoral appointees serve four-year terms.

10.2-10.4: OGE received four out of the five SGE financial disclosure reports required to be filed. According to NCPC ethics officials, one SGE's confidential financial disclosure report has not been filed. Of the four reports provided by NCPC, two were filed timely while one was filed late and one did not include a signature page. Additionally, only one report was reviewed and certified timely while one was certified late and two did not include final certifications dates.

10.7-10.9: All five SGEs were appointed prior to calendar year 2024 and subject to receive annual ethics training in 2024. OGE's review of the SGE training certifications found that two of the five SGEs received annual ethics training in 2024.

**RECOMMENDATIONS**

#	Element	RECOMMENDATION	Compliance Due
1	3.12	<u>RECOMMENDATION:</u> Ensure public financial disclosure reports are reviewed in a timely manner. Confirm signatures and dates are present on all public financial disclosure forms.	July 30, 2025

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		<u>AGENCY RESPONSE:</u> <b>Accepted.</b>	
2	3.13	<u>RECOMMENDATION:</u> Ensure public financial disclosure reports are filed and certified in a timely manner. Confirm signatures and dates are present on all public financial disclosure forms. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	July 30, 2025
3	3.13	<u>RECOMMENDATION:</u> Review and certify of the annual and termination reports for the agency's prior General Counsel. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	April 30, 2025
4	4.8	<u>RECOMMENDATION:</u> Ensure confidential financial disclosure reports are filed timely and that applicable extensions are recorded by NCPC. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	June 30, 2025
5	4.8	<u>RECOMMENDATION:</u> Confirm signatures and dates are present on all confidential financial disclosure forms. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	June 30, 2025
6	7.1	<u>RECOMMENDATION:</u> The initial ethics training submitted by NCPC included slides describing concepts related to conflicts of interests and gifts, but not slides explaining the concepts of impartiality or misuse of position. Future NCPC initial ethics training presentations should include slides dedicated to the concepts of impartiality and misuse of position in addition to the current slides addressing conflicts of interest and gifts. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	March 30, 2025
7	8.1	<u>RECOMMENDATION:</u> The annual ethics training presentation submitted by NCPC include slides explaining the concepts of financial conflicts of interest and impartiality, but not misuse of position and gifts. Future NCPC annual ethics training presentations should include slides dedicated to addressing each of those four topics in depth. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	March 30, 2025
8	10.2	<u>RECOMMENDATION:</u> NCPC should ensure all SGE financial reports are collected. NCPC should ensure SGE financial disclosure reports are filed and signed in a timely manner. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	June 30, 2025
9	10.3	<u>RECOMMENDATION:</u> NCPC should ensure SGE financial disclosure reports are reviewed in a timely manner and include the signature of the reviewing official. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	June 30, 2025
10	10.4	<u>RECOMMENDATION:</u> NCPC should ensure SGE financial disclosure reports certified in a timely manner. <u>AGENCY RESPONSE:</u> <b>Accepted.</b>	June 30, 2025

### GENERAL AGENCY COMMENTS

## ETHICS PROGRAM INSPECTION REPORT

Agency: National Capital Planning Commission

Report No.: 25-28I

Date: January 15, 2025

Period Covered by Review: January 1, 2024 through December 31, 2024

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**



Preventing Conflicts of Interest  
in the Executive Branch