

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Advisory Council on Historic Preservation

Follow-up to OGE Report Number: 22-42I

Report No.: 25-19IF

Date: December 2, 2024

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

As a result of its review of the Advisory Council on Historic Preservation's ethics program, the Office of Government Ethics (OGE) issued four recommendations in its July 2022 review report. OGE conducted a follow-up review to assess whether ACHP has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Make all reasonable efforts to collect a termination report from the former Chairman. If unable to collect the termination report, refer the Chairman to the Department of Justice for failure to file the report. Either assess or waive the applicable late filing fee.	<p>The circumstances surrounding the Chairman's departure provided agency ethics officials with little notice.</p> <p>Based on OGE's recommendation, ACHP attempted to collect the required public financial disclosure report, but could not establish communication with the former Chairman. OGE acknowledges ACHP's effort to collect this report. However, ACHP did not refer this case to the Department of Justice for failure to file the report. Consequently, this recommendation remains open. This matter must be referred to the Department of Justice pursuant to 5 U.S.C. § 13106 and 5 C.F.R. 2634.701(a).</p>	Open
2	Provide annual ethics training to all council members appointed by the President.	All council members appointed by the President, received annual ethics training as required in 2023.	Closed
3	Provide ethics training in accordance with applicable requirements.	Ethics trainings provided to special government employees and council members, met all requirements.	Closed

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4	Ensure that all special government employees serving on the board receive sufficient ethics training in a timely manner as required.	<p>ACHP regularly conducts an annual ethics training attended by Special Government Employees (SGE). The content of the training meets applicable regulatory requirements. However, the timing is such that not all new SGEs will have completed an initial ethics training prior to participating in their first board meeting.</p> <p>ACHP must ensure that all new SGEs required to receive ethics training have completed this training on or before their first board meeting.</p>	Open
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Based on the results of OGE's follow-up review, recommendations 2 and 3 are closed. OGE will conduct an additional follow-up review in approximately six months to assess whether the ACHP has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.