

ETHICS PROGRAM INSPECTION REPORT

Agency: Armed Forces Retirement Home (AFRH)

Report No.: 22-491

Date: August 2, 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	
	EMPLOYEES	
1.1	Number of full-time agency employees.	267
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See reviewer note
1.3	Number of non-PAS public financial disclosure reports required to be filed.	6
1.4	Number of confidential financial disclosure reports required to be filed.	34
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Chief Counsel
1.6	Grade level of DAEO.	GS-15
1.7	Title of Alternate DAEO (ADAEO).	See reviewer note
1.8	Grade level of ADAEO.	See reviewer note
1.9	Title of the primary, day-to-day ethics program administrator.	See reviewer note
1.10	Grade level of the primary, day-to-day ethics program administrator.	See reviewer note
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	1
1.13	Number of reporting levels between the DAEO and the agency head.	1
	COMMENTS	
	<p>Headquartered in Washington, DC, AFRH is an independent agency whose purpose is to provide residences and related services for certain former members of the Armed Forces. The Armed Forces Retirement Home Act of 1991 merged two institutions under one corporate organization: the U.S. Soldier's and Airmen's Home in Washington, D.C. and the U.S. Naval Home in Gulfport, Mississippi.</p> <p>(1.2) AFRH does not have any PAS positions. The agency's organizational structure and oversight is unique in the Federal Government. While it is an independent agency, AFRH's leadership and administration is overseen by the Secretary of Defense. The Deputy Director of the Defense Health Agency also serves as the AFRH's Senior Medical Advisor. As Senior Medical Advisor, the Deputy Director advises the agency on medical care and coordination of services with the Department of Defense and the Department of Veterans Affairs. The Secretary of Defense's oversight responsibilities are delegated to the Director of Administration and Management and the Director of Washington Headquarters Services, and exercised day-to-day by the AFRH's Chief Executive Officer (CEO), a Department of Defense executive. The CEO appoints key AFRH officials including the Chief Operating Officer (COO) who serves as the AFRH agency head, as well as the Administrator and Ombudsman for each campus.</p> <p>(1.7 – 1.10) The ADAEO position, historically held by an Assistant General Counsel, has been vacant since 2018. When the position is filled the ADAEO is the primary, day-to-day administrator of the ethics program. According to the DAEO, the Department of Defense is planning to fill the position after it completes a lease to develop 80 Acres on its campus. This lease execution is expected to occur in the Fall of 2022. OGE notes that in absence of an ADAEO, the DAEO is now the primary, day-to-day administrator of the ethics program. The DAEO has been in that position since March 2014.</p> <p>(1.11) AFRH does not have any full-time ethics officials.</p>	

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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. <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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	COMMENTS			
	(2.2) As noted, the ADAEO position has been vacant since 2018.			

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	<ul style="list-style-type: none">Collection of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	<ul style="list-style-type: none">Review/evaluation of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	<ul style="list-style-type: none">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).	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).	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			

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GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

(3.7 and 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. AFRH has only six positions whose incumbents are required to file public financial disclosure reports and there was only one appointment to a public filing position during the period covered by the inspection. The DAEO (who is one of the agency's six public filers) would be aware of pending appointments and terminations.

(3.14 – 3.17) AFRH does not have any PAS positions.

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).	100%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%
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

(4.5) AFRH does not have an OGE-approved alternative confidential financial disclosure system.

(4.6) As with the public reports, the DAEO would be aware of new appointments and departures to and from confidential filing positions. The agency had only 35 confidential filers in 2021.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

5.4	<ul style="list-style-type: none"> Where applicable, notice of the time frame for completing initial ethics training. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> 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 checked="" 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 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</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"/>

COMMENTS

AFRH outsources hiring actions to the Department of Treasury's Bureau of Fiscal Services (BFS). This includes sending the required information with the written offers to prospective AFRH employees. OGE examined five letters issued to prospective AFRH employees in 2021 and found that they omitted the following:

(5.3) Contact information for the DAEO or an explanation of how to obtain additional information on applicable ethics requirements, and

(5.5) An explanation that new entrant reports are to be filed within 30 days of appointment. OGE did however find the notice to include a statement regarding financial disclosure requirements.

OGE reminds the DAEO that, while an agency may outsource certain functions, responsibility for ensuring that the Agency's ethics program meets all applicable requirements remains with the DAEO.

(5.6 and 5.7) At the time of OGE's inspection, AFRH had not established written procedures for issuing notices to prospective employees. OGE regulations require the DAEO to review the written procedures annually. *See* 5 C.F.R. § 2638.303(c). OGE therefore recommends that AFRH's DAEO perform annual reviews of the agency's written procedures for issuing required notices to prospective employees, once they are drafted. (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, AFRH's written procedures should note the functions outsourced to BFS, provide instructions for contacting the appropriate staff within BFS, and explain how to access the contract/agreement between the AFRH and BFS.)

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: *See* 5 C.F.R. § 2638.306.

6.1	<ul style="list-style-type: none"> Contact information for the agency's ethics office. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"> The text of 5 C.F.R. § 2638.103. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 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</i> 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

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GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch**COMMENTS**

(6.1 – 6.4 and 6.7) At the time of OGE's inspection, notices had not been provided to new supervisors as required by 5 C.F.R. § 2638.306. (6.5) At the time of OGE's inspection, AFRH had not established written procedures for supervisory ethics notices as required by 5 C.F.R. § 2638.306(d). See OGE's comments regarding 5.6 - 5.7.

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.

See reviewer note

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

See reviewer note

COMMENTS

(7.5 – 7.6) OGE was not able to independently examine initial ethics training records. According to the DAEO, HR reported that in 2021 AFRH had 52 new employees all of whom received initial ethics training. OGE recommends that the DAEO ensure a means of verifying that initial ethics training is received even when the function is outsourced. For example, one way to accomplish this would be to HR provide the DAEO quarterly reports highlighting the new employees who completed or have yet to complete the initial ethics training requirement. This will also help OGE independently determine compliance during future ethics program reviews/inspections.

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. § 2638.304(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).

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

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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">Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A	
8.7	<ul style="list-style-type: none">Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	N/A	
8.8	<ul style="list-style-type: none">SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	100%	100%	
	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">Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	N/A	94%	
8.10	<ul style="list-style-type: none">Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A	
8.11	<ul style="list-style-type: none">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	<ul style="list-style-type: none">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	<ul style="list-style-type: none">Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	N/A	
COMMENTS				
<p>(8.1) OGE found the annual training presentation provided during the period under inspection to address all training concepts with the possible exception of impartiality. OGE is not making a formal recommendation for the omission of the concept related to impartiality since it appeared to be implicitly addressed during the presentation. OGE suggests that in future trainings, the DAEO make certain to highlight each of the four required topics through discussion questions or summary statements to ensure that each concept is addressed.</p> <p>(8.6) AFRH does not have any Executive Schedule Level I and Level II employees.</p> <p>(8.7) AFRH does not have any PAS and equivalent employees required to file public financial disclosure reports.</p> <p>(8.8) The DAEO personally trained the Chief Operating Officer, an SES employee, while all other public filers in this category completed interactive ethics training in 2021.</p> <p>(8.10 – 8.12) AFRH does not have any employees in these categories.</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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	COMMENTS			
	None			

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**UNITED STATES OFFICE OF
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10.1	Number of SGEs serving on Advisory Committees and Boards.	See reviewer comment
	DATA ANALYSIS	%
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. <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 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. <i>See</i> 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. <i>See</i> 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	N/A		
	COMMENTS			
	(10.1 – 10.9) AFRH does not have any special government employees serving on advisory committees and boards.			

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	5.3	<u>RECOMMENDATION:</u> Update the agency's written notice to prospective employees to include the DAEO's contact information. <u>AGENCY RESPONSE:</u> Request to update written notice to prospective employees has been sent to government service provider.	December 2022
2	5.5	<u>RECOMMENDATION:</u> Update the written notice to prospective employees to include an explanation that new entrant reports must be filed within 30 days of appointment, as appropriate. <u>AGENCY RESPONSE:</u> Request to update written notice to prospective employees has been sent to government service provider.	December 2022

ETHICS PROGRAM INSPECTION REPORT

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UNITED STATES OFFICE OF GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

3	5.6-5.7	<p><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).</p> <p><u>AGENCY RESPONSE:</u> Request to update AFRH Directive has been sent to AFRH/CHCO.</p>	December 2022
4	6.5-6.7	<p><u>RECOMMENDATION:</u> Draft an appropriate notice for new supervisors and establish written procedures for issuing notices to new supervisors. Ensure that new supervisors receive the information required by 5 C.F.R. § 2638.306.</p> <p><u>AGENCY RESPONSE:</u> Notice to new supervisors was sent. Request to update written procedures has been sent to AFRH/CHCO.</p>	December 2022
5	7.5-7.6	<p><u>RECOMMENDATION:</u> Ensure a means of verifying that initial ethics training is received even when the function is outsourced by 5 C.F.R. § 2638.304.</p> <p><u>AGENCY RESPONSE:</u> Concur.</p>	December 2022