

ETHICS PROGRAM INSPECTION REPORT

Agency: Selective Service System

Report No.: 20-39I

Date: August 3, 2020

Period Covered by Review: January 1, 2019- December 31, 2019

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**


Preventing Conflicts of Interest
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1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	119
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.	4
1.4	Number of confidential financial disclosure reports required to be filed.	9
	ETHICS PROGRAM	
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).	Attorney Advisor
1.8	Grade level of ADAEO.	GS-13
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
	COMMENTS	
	(1.2) The Selective Service System (SSS) has no PAS officials.	

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	COMMENTS			
	None			

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		%		
3.9	Percentage of sampled non-PASnew entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	N/A		
3.10	Percentage of sampled non-PASannual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%		
3.11	Percentage of sampled non-PAStermination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A		
3.12	Percentage of sampled non-PASpublic 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-PASpublic 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) All reports were filed timely. Therefore, it was not necessary to collect or waive late filing fees. (3.9) No non-PASnew entrant reports were required to be filed in 2019. (3.11) No non-PAStermination reports were required to be filed in 2019. (3.14-3.17) SSS 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: <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"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		

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4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	N/A
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	N/A
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A
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).	N/A

COMMENTS

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

(4.6) According to the DAEO, SSS did not have any new confidential financial disclosure filers in 2019.

(4.3 – 4.5, 4.7 – 4.10) OGE was unable to assess whether SSS was in compliance with these requirements. SSS's ethics officials advised OGE that, consistent with guidance from the Office of Management and Budget, all staff are working remotely during the COVID-19 pandemic. The materials OGE requires to make its assessment are inaccessible from remote locations. SSS staff would be required to physically enter their offices to retrieve and transmit the materials to OGE. OGE's policy during the COVID-19 pandemic strictly prohibits asking agencies to send staff to their offices or otherwise violate social-distancing or other mitigation policies to retrieve requested materials. OGE will assess SSS's compliance with these requirements when circumstances permit.

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: <i>See</i> 5 C.F.R. § 2638.303.			
5.1	<ul style="list-style-type: none"> A statement regarding the agency's commitment to government ethics. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<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 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
	<p>(5.0-5.5) SSS had no written procedures for including required content in offers of employment prior to OGE's inspection. The SSS offer letters did not include the required ethics-related content prior to OGE's inspection. The DAEO added the required language while OGE's inspection was ongoing.</p> <p>(5.2; 5.7) The agency's written procedures were created during the inspection in 2020 and identify the DAEO annually reviewing the written procedures.</p> <p>(5.8) SSS had no process for ensuring all covered employees receive the required information with their written offer of employment prior to OGE's inspection.</p>			

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</i> 5 C.F.R. § 2638.306.			

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6.1	• Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input checked="" type="checkbox"/>	<input 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"/>
COMMENTS				
<p>(6.0-6.4) The SSS had not provided offer letters upon initial appointment to a supervisory position the required ethics-related content prior to OGE's inspection. The DAEO added the required language while OGE's inspection was ongoing.</p> <p>(6.5-6.6) SSS had no written procedures for providing the required information to new supervisors prior to OGE's inspection. The DAEO created written procedures while the inspection was ongoing. These written procedures address all applicable requirements, including an annual review by the DAEO.</p> <p>(6.7) SSS had no process for ensuring that new supervisors receive the required information prior to OGE's inspection.</p>				

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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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).	67%		
	COMMENTS			
	(7.1) OGE found the initial ethics training presentation provided during the period covered by the inspection addressed all required concepts. However, the training did not meet format requirements to be considered interactive training. OGE reviewed the new training materials prepared for initial ethics training for 2020 and found they also met content requirements and the method of presentation does meet format requirements to be considered interactive training. (7.3) SSS had no written procedures for initial ethics training prior to OGE’s inspection. The DAEO drafted the required written procedures while OGE’s inspection was ongoing. (7.4) The written procedures SSS provided during the inspection included the annual review requirement. (7.6) Two of the six new employees received initial ethics training more than three months after they were appointed.			

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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).			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).			<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. See 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. See 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. See 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. See 5 C.F.R. § 2638.308(a).					
8.6	• Executive Schedule Level I and Level II. See 5 C.F.R. § 2638.308(e)(1).			N/A	N/A	
8.7	• Other PAS and Equivalent. See 5 C.F.R. § 2638.308(e)(2).			N/A	N/A	
8.8	• SES and Equivalent. See 5 C.F.R. § 2638.308(e)(3).			100%	N/A	
	Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. See 5 C.F.R. § 2638.307(a)(d).					
8.9	• Employees required to file an annual confidential financial disclosure report. See 5 C.F.R. § 2638.307(a)(1).			N/A	100%	
8.10	• Employees appointed by the President. See 5 C.F.R. § 2638.307(a)(2).			N/A	N/A	
8.11	• Employees of the Executive Office of the President. See 5 C.F.R. § 2638.307(a)(2).			N/A	N/A	
8.12	• Contracting officers described in 41 U.S.C. § 2101. See 5 C.F.R. § 2638.307(a)(3).			N/A	N/A	
8.13	• Other employees designated by the head of the agency. See 5 C.F.R. § 2638.307(a)(4).			N/A	N/A	
COMMENTS						
(8.6) SSS had no employees in this category. (8.7) SSS had no employees in this category. (8.9-8.13) OGE reviewed SSS' training records and determined that all employees required to receive annual training were trained. However, training records did not differentiate between category of employee.						

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**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. *See* 5 C.F.R. § 2638.104(c)(4).☒☐☐**COMMENTS**

None

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION**Element****ISSUE**

3.1-3.2

ISSUE: Prior to OGE's inspection, SSS's written procedures for administering the public financial disclosure system did not reflect that public financial disclosure reports are now filed in Integrity, OGE's electronic financial disclosure system. SSS updated its procedures during the course of the inspection.

AGENCY RESPONSE: Concur

5.1-5.5

ISSUE: Prior to OGE's inspection, SSS did not have written offer letters of employment that met the requirements of 5 C.F.R. § 2638.303. SSS drafted a template of written offer letters of employment during the course of the inspection.

AGENCY RESPONSE: Concur

5.6-5.8

ISSUE: Prior to OGE's inspection, SSS did not have written procedures for issuing notices to prospective employees and the ability to ensure that prospective employees receive the notices, as required by 5 C.F.R. § 2638.303. SSS drafted the written procedures during the course of the inspection.

AGENCY RESPONSE: Concur

6.1-6.4

ISSUE: Prior to OGE's inspection, SSS did not have written notices to new supervisors that met the requirements of 5 C.F.R. § 2638.306. SSS drafted a template of written offer letters of employment to new supervisors along with written notices to new supervisors during the course of the inspection.

AGENCY RESPONSE: Concur

6.5

ISSUE: Prior to OGE's inspection, SSS did not have written procedures for supervisory ethics notices and the ability to ensure that new supervisors received the notices, as required by *See* 5 C.F.R. § 2638.306(d). SSS drafted the written procedures during the course of the inspection.

AGENCY RESPONSE: Concur

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7.3

ISSUE: Prior to OGE's inspection, SSS did not have written procedures for initial ethics training. *See* 5 C.F.R. § 2638.304(f). SSS drafted the written procedures during the course of the inspection.

AGENCY RESPONSE: Concur

5.7, 6.6,
7.4

ISSUE: The drafted SSS's written procedures created during the course of the inspection (notice to prospective employees, notices to new supervisors and initial ethics training) did not document that the DAEO reviews the procedures annually. SSS updated its procedures during the course of the inspection.

AGENCY RESPONSE: Concur

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	3.7-3.8	<p>RECOMMENDATION: Ensure 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 and notifies 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)(1) and <i>See</i> 5 C.F.R. § 2638.105(a)(2).</p> <p>AGENCY RESPONSE: Concur. The DAEO will ensure that that HRO will do the above. Note that there are only 3 positions at SSS requiring an OGE form 278. They are all political appointees. Therefore, the DAEO, who is also the GC, will know when new political appointees has been appointed and when they are leaving the Agency. Note that the political appointees have not changed in 5 = 6 years.</p>	2/3/2021
2	4.6	<p>RECOMMENDATION: Ensure 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).</p> <p>AGENCY RESPONSE: Concur</p>	2/3/2021
3	5.8	<p>RECOMMENDATION: Ensure SSS has 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.</p> <p>AGENCY RESPONSE: This has already been done by establishing written policies for it, along with a template email/letter to be sent with written offer of employment by HR.</p>	2/3/2021