

**ETHICS PROGRAM INSPECTION REPORT**Agency: U.S. Commission for the Preservation of America's Heritage  
Abroad (Commission)

Report No.: 21-421

Date: September 14, 2021

Period Covered by Review: January 1, 2020 through August 15, 2021

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

1.0	<b>AGENCY DATA</b>		
	<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.	2	
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.	21	
	<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	Administrative Director	
1.6	Grade level of DAEO.	GS-15	
1.7	Title of Alternate DAEO (ADAEO).	Administrative Officer	
1.8	Grade level of ADAEO.	GS-9	
1.9	Title of the primary, day-to-day ethics program administrator.	Administrative Director	
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>		
	None		

2.0	<b>LEADERSHIP</b>			
	<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	<b>PUBLIC FINANCIAL DISCLOSURE</b> (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 checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>DATA ANALYSIS</b>	<b>%</b>		
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).	0%		
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).	0%		
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).	0%		
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		
	<b>COMMENTS</b>			
	(3.4, 3.10) The DAEO is the Commission’s only public filer. OGE examined the DAEO’s 2020 and 2021 annual reports. The 2021 report was filed almost three months after the due date. Therefore, the agency must either collect or waive the applicable late filing fee. (3.7, 3.8) The Commission does not have an HR or similar office to deal with personnel matters. Instead, the Commission has contracted with the General Services Administration (GSA) to provide personnel-related services. The DAEO also serves as the “hiring” official for the Commission. In that capacity, the DAEO would be aware of any relevant personnel related actions. This includes appointments to positions that require incumbents to file confidential or public financial disclosure reports and terminations from positions that require incumbents to file public reports. Therefore, it is not imperative that GSA advise the DAEO of appointments and terminations. In fact, the DAEO would most likely be the source of information GSA used to provide the announcements. (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 the inspection. (3.12-3.13) The DAEO signed her 2020 annual report on March 18, 2020. However, it appeared not to have been reviewed/certified until November 18, 2020. The DAEO’s report must be filed timely, reviewed within 60 days of submission by the Chairman (as the agency head), and submitted to OGE as soon as the Chairman has completed reviewing the report. (3.14-3.17) The Commission does not have any PAS positions.			

**4.0 CONFIDENTIAL FINANCIAL DISCLOSURE**

<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.2	• Review/evaluation of confidential financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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).	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		
	<b>COMMENTS</b>			
	(4.1-4.10) The Commission did not have any regular-employee positions that require incumbents to file confidential financial disclosure reports during the period covered by the inspection. (4.5) The Commission does not have an OGE-approved alternative confidential financial disclosure system. (4.7-4.10) The Commission's only confidential financial disclosure report filers are special government employees (SGE). (See Section 10.0)			

<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	• A statement regarding the agency's commitment to government ethics.	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input type="checkbox"/>	<input checked="" 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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
(5.1-5.8) There was only one regular employee hired in 2020. The DAEO had developed a notification template, which included all required information to be provided to prospective employees. However, the sole available written offer of employment provided to OGE did not include the required notice. (5.6) The Commission does not have written procedures for issuing notices to prospective employees.				

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<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 5 C.F.R. § 2638.306.</i>				
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 5 C.F.R. § 2638.306(d).</i>	<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 5 C.F.R. § 2638.306(d).</i>	<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 5 C.F.R. § 2638.306(b).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
(6.1-6.7) The Commission does not have written procedures for issuing notices to new supervisors. The DAEO and ADAEO are the only agency employees and the DAEO, as Administrative Director, is the hiring official and the only supervisor.				

**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 5 C.F.R. § 2638.304.</i>			
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	<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 5 C.F.R. § 2638.304(e)(2).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	<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 5 C.F.R. § 2638.304(f).</i>	<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 5 C.F.R. § 2638.304.</i>	0%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	0%		
	COMMENTS			
	(7.1-7.6) The Commission did not provide documentation that would explain what subject matter was addressed during initial ethics training nor was documentation available to indicate the date on which training occurred. However, the DAEO affirmed IET was provided to the ADAEO, the only employee hired in 2020. (7.3) The Commission does not have written procedures for initial ethics training.			

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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

N/A

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**

(8.1-8.13) DAEO stated the Commission did not conduct in-house annual ethics training and no materials were provided to OGE for review. The DAEO attended new A/DAEO training provided by OGE in September of 2020. The content of that training fulfills the requirements of annual ethics training.

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	<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) No written advice or counseling was requested or provided during the period covered by the inspection.			

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

10.1	Number of SGEs serving on Advisory Committees and Boards.	21
	<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).	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**

	<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.	100%		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	50%		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	43%		
	<b>COMMENTS</b>			
	<p>(10.2-10.4) OGE was unable to assess whether the Commission was in compliance with these requirements. The Commission 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 in order to make its assessment are inaccessible from remote locations. The Commission 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 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 the Commission's compliance with these requirements when circumstances permit.</p> <p>(10.7, 10.8) Of the two SGEs appointed in 2020, OGE could only independently verify one received ethics training within 90 days of appointment as required.</p> <p>(10.7-10.9) As Presidential appointees, Commission members are required to receive annual ethics training that is interactive. (See 5 C.F.R. § 2638.307(a)(2).</p>			

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### RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	(3.4)	<p><u>RECOMMENDATION:</u> Assess or waive the late filing fee for the Commission's one public filer who did not submit their 2020 report until August 10, 2020. <i>See</i> 5 CFR § 2634.704(a)(b)</p> <p><u>AGENCY RESPONSE:</u> The annual report was assigned to the DAEO was 7/12/21. The report was submitted on 8/10/21; less than 30 days after the report was assigned to the DAEO by the ADAEO. In March, the DAEO informed the ADAEO that the report needed to be assigned to the DAEO so the DAEO could complete it. The late filing fee for the DAEO will be waived. The ADAEO will be reminded that reports need to be assigned to the filer in a timely manner.</p>	
2	(3.10, 3.12, 3.13)	<p><u>RECOMMENDATION:</u> Ensure the DAEO's report is filed timely, reviewed by the Chairman timely, and submitted to OGE timely. <i>See</i> 5 C.F.R. § 2634.605(a)</p> <p><u>AGENCY RESPONSE:</u> USCPAHA is committed to filing timely reports. USCPAHA kindly requests written guidance from OGE regarding the need for the Agency Head to review and submit Public Reports.</p>	
3	(5.6, 5.7)	<p><u>RECOMMENDATION:</u> Establish and annually review written procedures for issuing notices to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c)</p> <p><u>AGENCY RESPONSE:</u> USCPAHA will create written procedures for issuing notices to prospective employees. USCPAHA will request that GSACABS provide this to prospective employees.</p> <p><u>OGE COMMENT:</u> GSACABS is the Government Services Administration support services agency for Commissions and Boards.</p>	
4	(6.5, 6.6)	<p><u>RECOMMENDATION:</u> Establish and annually review written procedures for issuing notices to new supervisory employees. <i>See</i> 5 C.F.R. § 2638.306(d)</p> <p><u>AGENCY RESPONSE:</u> USCPAHA will create written procedures for issuing notices to new supervisors. USCPAHA will request that GSACABS provide this to new supervisors.</p>	
5	(7.3, 7.4)	<p><u>RECOMMENDATION:</u> Establish and annually review written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f)</p> <p><u>AGENCY RESPONSE:</u> USCPAHA has two federal employees, those employees also occupy the roles of DAEO and ADAEO. Upon hire, the DAEO and/or ADAEO participate in OGE managed training for new DAEO/ADAEOs. The training for these positions is much more intensive than what a non-DAEO/ADAEO would receive. USCPAHA provided confirmation that the newly hired ADAEO participated in DAEO/ADAEO training. USCPAHA made an assumption that attending an OGE developed and led ethics training as part of new employee on-boarding would successfully meet this requirement.</p> <p>USCPAHA will create guidance in their Admin Manual related to ethics training at onboarding which will include written materials and procedures for initial ethics training and will be reviewed by the DAEO/ADAEO each year.</p>	



## ETHICS PROGRAM INSPECTION REPORT

Agency: U.S. Commission for the Preservation of America's Heritage  
Abroad (Commission)

Report No.: 21-421

Date: September 14, 2021

Period Covered by Review: January 1, 2020 through August 15, 2021

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest  
in the Executive Branch

6	(10.9)	<p><b>RECOMMENDATION:</b> Ensure 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)</p> <p><b>AGENCY RESPONSE:</b> USCPAHA will review 5 C.F.R. § 2638.307(d) and will ensure that the annual ethics training complies with the requirements.</p> <ul style="list-style-type: none"><li>a. Public filers will receive interactive training. As USCPAHA has only one public filer and this person is the Agency DAEO, interactive training will consist of OGE led and managed trainings.</li><li>b. Other employees as designated by the Agency Head consist of the second USCPAHA employee, who is also the ADAEO. The ADAEO will participate in OGE led and managed trainings each year.</li><li>c. Confidential filers at USCPAHA are Special Government Employees who are expected to work no more than 60 days per calendar year, excluding the Chair of the Commission, and as such, the only requirement is to provide written materials to this group of employees (per 5 C.F.R. § 2638.307(d)).</li><li>d. The Chair of the Commission is a confidential filer and a Special Government Employee, yet works more than 60 days per calendar year. The Chair of the Commission will receive written materials as well as interactive training.</li></ul>	
OGE COMMENTS			
OGE will provide the guidance necessary to bring the Commission's ethics program into compliance with applicable requirements.			