

## ETHICS PROGRAM INSPECTION REPORT

Agency: Harry S. Truman Scholarship Foundation (Foundation)

Report No.: 22-33I

Date: May 25, 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	
	<b>EMPLOYEES</b>	
1.1	Number of full-time agency employees.	5
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See reviewer comment
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.	See reviewer comment
	<b>ETHICS PROGRAM</b>	
1.5	Title of Designated Agency Ethics Official (DAEO).	Executive Secretary
1.6	Grade level of DAEO.	SES
1.7	Title of Alternate DAEO (ADAEO).	Deputy Executive Secretary
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Deputy Executive Secretary
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.	Agency head serves as DAEO
	<b>COMMENTS</b>	
	<p>Headquartered in Washington, DC, the Foundation is an independent agency of the executive branch of the federal government that honors the thirty-third president of the United States with a living memorial that awards scholarships to persons who demonstrate outstanding potential for and who plan to pursue a career in public service. In 2021, the Foundation selected 62 outstanding college students from 51 institutions as Truman Scholars. In 2022, 58 students from 53 institutions were selected.</p> <p>(1.2) The Foundation is subject to the supervision and direction of a Board of Trustees (Board). The Board is comprised of 13 members: including eight members appointed by the President with the advice and consent of the Senate (PAS); two members of the Senate, who are appointed by the President of the Senate; two members of the House of Representatives, who are appointed by the Speaker; and the Secretary of Education or designee, who serves as an ex officio member of the board, but is not eligible to serve as Chairman.</p> <p>Board members are appointed for six-year terms, with some exceptions, and serve without compensation. Since the Foundation's inception, the eight PAS members have been considered representatives and not special Government employees (SGEs) since they are designated to serve as representatives of a certain group of people (e.g., "Representatives of Higher Education.") and provide that viewpoint during board meetings. Despite their designation as representatives, new board members file a new entrant confidential financial disclosure report with the White House Office of Presidential Personnel.</p> <p>(1.3) The Foundation's Executive Secretary also serves as the agency's DAEO. The Executive Secretary/DAEO position is the only position whose incumbent is required to file a public financial disclosure report. The Executive Secretary/DAEO's report is initially reviewed and certified by the agency's ADAEO and is then forwarded to OGE for final review and certification.</p> <p>(1.4) The Foundation historically has not had any positions meeting the criteria determining which positions include duties that would require the incumbent to file a confidential financial disclosure report and did not have a position subject to confidential filing during the period covered by the inspection.</p> <p>(1.12) The two part-time ethics officials are the Executive Secretary/DAEO and the Deputy Executive Secretary/ADAEO.</p> <p>(1.13) The Executive Secretary is appointed by the Board and serves as the Chief Executive Officer of the Foundation and carries out the functions of the Foundation subject to the supervision of the Board. However, the Executive Secretary/DAEO has a high degree of autonomy and does not report to the President of the Foundation on matters regarding the ethics program.</p>	

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

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"/>
<b>COMMENTS</b>				
<p>(2.1 – 2.2) In 2014, the Foundation formally notified OGE that the DAEO duties are incorporated into the position description of the Executive Secretary and the ADAEO duties are incorporated into the position description of the Deputy Executive Secretary. Since 2014, OGE has recognized this letter to comply with agency designation requirements.</p> <p>In 2019, OGE created templates for agency heads to use when designating a new DAEO or ADAEO. OGE communicated this via its Legal Advisory dated June 5, 2019, which explained that going forward agency heads must use OGE's Form 241A or 241B Notification of Designation form when designating a new DAEO or ADAEO. Using this form agency heads confirm that the designated individual meets the regulatory qualifications for the DAEO or ADAEO position outlined in the designation and prescribed by 5 C.F.R. § 2638.104. Agencies are required to notify OGE in writing within 30 days of designating an employee as DAEO or ADAEO.</p> <p>OGE notes that a new Executive Secretary/DAEO was hired by the Foundation in July 2019 but the OGE Form 241A (Designation of the DAEO) was not used naming the new DAEO. While OGE is not requiring the Foundation to take any action, OGE offers this as a reminder that should a new DAEO or ADAEO be hired in the future, the OGE Form 241A or 241B must now be used.</p>				

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 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"/>
<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).	100%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(c).	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).	0%		

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**UNITED STATES OFFICE OF  
GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

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>		
<p>(3.4, 3.9, and 3.11) The only public financial disclosure report required to be filed during the period covered by the inspection was the Executive Secretary/DAEO's annual report. OGE examined this report during the inspection and found it to have been filed timely.</p> <p>(3.7 – 3.8) The Foundation outsources human resources functions to the Department of the Interior's Interior Business Center. However, the Executive Director/DAEO is the Foundation's only public financial disclosure report filer and the Deputy Executive Secretary/ADAE0 would be aware of this appointment. The ADAEO would also be responsible for notifying OGE of this appointment as part of the hiring process of the Executive Secretary.</p> <p>(3.13) OGE notes that the Executive Secretary/DAEO's report was certified by the ADAEO more than 60 days after submission. The report was filed in May 2021 and certified by the ADAEO in November 2021. During the inspection, OGE followed up with the ADAEO to determine why the DAEO's report was certified late. The ADAEO indicated that this was an error on her part as she thought she had signed the report. However, the ADAEO confirmed that the report had been reviewed for conflicts before the November signature date.</p> <p>OGE reminds the ADAEO that since this is the only public report within the agency and it's filed by the Executive Secretary who also serves as the agency's DAEO, it is important that this report be filed, reviewed, and certified timely. Public financial disclosure reports are subject to public availability 30 days after submission, regardless of whether they have been reviewed and certified. Long gaps of time between when the public report was submitted and when the report is certified may give the public the impression that a conflict of interest determination was not made timely. OGE advises the ADAEO to ensure that the DAEO's report is certified as soon as possible after submission but no later than 60 days of receipt. Because this report is forwarded to OGE for final review and certification this will also ensure that OGE's review and certification are done in a timely manner.</p>		

**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"/>
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		

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

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 Foundation has historically had no employees who are required to file a confidential financial disclosure reports. OGE has reported this fact in previous OGE ethics program reviews. As a result, the Foundation has not established written procedures for the collection and review of confidential reports. However, ethics officials are aware that should the Foundation designate a position(s) as covered for purposes of confidential financial disclosure,, they will be required to establish written procedures. The Foundation did not have any covered positions during the period covered by this inspection.		

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"> <li>A statement regarding the agency's commitment to government ethics.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>COMMENTS</b>				
(5.1 -5.5 and 5.8) As noted, the Foundation outsources its human resource services to the Interior Business Center, including the provision of offer letters to prospective Foundation employees. The Foundation did not have any new employees during the period of inspection.				

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

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

(6.1 - 6.4 and 6.7) The Foundation only has two employees with supervisory duties - the Executive Secretary/DAEO and Deputy Executive Secretary/ADAEO. A new DAEO was hired in 2019 and the ADAEO has been with the agency for a number of years. No appointments to supervisory positions were made during the period covered by the inspection.

**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.*

N/A

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

N/A

**COMMENTS**

(7.1 - 7.2 and 7.5-7.6) The Foundation did not have any new employees during the period covered by the inspection. As a result, initial ethics training was not provided and the review team did not examine any training material.

**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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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).*

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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).*

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

	DATA ANALYSIS	Training Format	
		Live	Interactive
	Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.308(a).</i>		
8.6	• Executive Schedule Level I and Level II. <i>See 5 C.F.R. § 2638.308(e)(1).</i>	N/A	N/A
8.7	• Other PAS and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(2).</i>	N/A	N/A
8.8	• SES and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(3).</i>	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 5 C.F.R. § 2638.307(a)(d).</i>		
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See 5 C.F.R. § 2638.307(a)(1).</i>	N/A	N/A
8.10	• Employees appointed by the President. <i>See 5 C.F.R. § 2638.307(a)(2).</i>	N/A	N/A
8.11	• Employees of the Executive Office of the President. <i>See 5 C.F.R. § 2638.307(a)(2).</i>	N/A	N/A
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See 5 C.F.R. § 2638.307(a)(3).</i>	N/A	N/A
8.13	• Other employees designated by the head of the agency. <i>See 5 C.F.R. § 2638.307(a)(4).</i>	100%	N/A
	<b>COMMENTS</b>		
	(8.1 - 8.2 and 8.13) According to the ADAEO, annual ethics training was designed to help the Foundation staff address potential conflicts of interest and avoid potential violations of the Standards related to the selection process. All Foundation employees were required to attend. The DAEO is the Foundation's only financial disclosure report filer and is the only employee required to receive annual ethics training. The DAEO is presumed to have met the annual training requirement through routine performance of her duties as DAEO.		
	(8.6) The Foundation does not have any Executive Schedule Level I or Level II employees.		
	(8.7 – 8.12) The Foundation had no employees in these categories.		

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 5 C.F.R. § 2638.104(c)(4).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>COMMENTS</b>			
	(9.1) According to the ADAEO, the Foundation did not provide any written ethics counseling 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.	N/A
	DATA ANALYSIS	%
10.2	Percentage of sampled confidential new entrant reports filed timely. See 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. See 5 C.F.R. § 2634.605(a).	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. See 5 C.F.R. § 2634.605(a).	N/A

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	<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 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"/>
	<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.	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		
	<b>COMMENTS</b>			
	(10.1 - 10.9) The Foundation does not have any SGEs serving on advisory committees or boards.			