

1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	901
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	1
1.3	Number of non-PAS public financial disclosure reports required to be filed.	34
1.4	Number of confidential financial disclosure reports required to be filed.	232
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Associate General Counsel
1.6	Grade level of DAEO.	FP-01
1.7	Title of Alternate DAEO (ADAEO).	Associate General Counsel
1.8	Grade level of ADAEO.	FP-01
1.9	Title of the primary, day-to-day ethics program administrator.	Administrative Specialist
1.10	Grade level of the primary, day-to-day ethics program administrator.	FP-05
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.	2
	COMMENTS	
	(1.12): Peace Corps has assigned primary responsibility for the day-to-day administration of the ethics pecialist. However, the agency has not designated the Administrative Specialist as an ethics official. time ethics officials and no full-time ethics 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. See 5 C.F.R. § 2638.107(a).	\boxtimes		
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. See 5 C.F.R. § 2638.107(a).	\boxtimes		
	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: See 5 U.S.C. app. IV, § 402(d)(1).			
3.1	Collection of public financial disclosure reports.			
3.2	Review/evaluation of public financial disclosure reports.	\boxtimes		
3.3	Public availability of public financial disclosure reports.	\boxtimes		
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.			



3.5	Public financial disclosure reports are securely maintained. See OGE/GOVT-1.	\boxtimes			
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).	\boxtimes			
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).	\boxtimes			
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).	\boxtimes			
	DATA ANALYSIS		%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. See 5 C.F.R. § 2634.201(b).		67%		
3.10	Percentage of sampled non-PAS annual reports filed timely. See 5 C.F.R. § 2634.201(a).		92%		
3.11	Percentage of sampled non-PAS termination reports filed timely. See 5 C.F.R. § 2634.201(e).		100%		
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).		66%		
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. See 5 C.F.R. § 2634.605(a).		66%		
3.14	Percentage of sampled PAS annual reports filed timely. See 5 C.F.R. § 2634.201(a).		100%		
3.15	Percentage of sampled PAS termination reports filed timely. See 5 C.F.R. § 2634.201(e).		N/A		
3.16	Percentage of sampled PAS annual reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).		0%		
3.17	Percentage of sampled PAS annual reports certified within 60 days of receipt. See 5 C.F.R. § 2634.605(a).		0%		
	COMMENTS				
	(3.9): OGE reviewed the three new entrant reports required to be filed in 2020. One report was submitted late because the filer was not time notified of the requirement to file a new entrant report. Ethics officials waived the late filing fee because of this administrative oversight. (3.10): OGE reviewed 25 of the 27 annual reports required to be filed in 2020. The remaining two reports were not filed. Ethics officials advised OGE that they had not informed the filers they were required to submit reports, and therefore, decided to waive the late filing fee. Ninety-two percent of the 25 reports reviewed by OGE were filed timely. (3.11): OGE reviewed four of the five termination reports required to be filed in 2020. The four reports were filed timely. However, according to ethics officials, the remaining report was not assigned in Integrity, and thus, not filed. OGE asked Peace Corps ethics official whether they would request the former employee whose report went unassigned to file a termination report. Ethics officials indicated that they were waiting for information from OHR, regarding when he left the covered position, to have him file a termination report. (3.15): No PAS termination reports were required to be filed in 2020. (3.16): One PAS annual report was required to be filed in 2020.				

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.	\square		
4.2	Review/evaluation of confidential financial disclosure reports.	\boxtimes		
4.3	Confidential financial disclosure reports are securely maintained. See OGE/GOVT-2.	\boxtimes		
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	\boxtimes		



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).			\boxtimes
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. See 5 C.F.R. § 2638.105(a)(1).	\boxtimes		
	DATA ANALYSIS		%	
4.7	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).		47%	
4.8	Percentage of sampled confidential annual reports filed timely. See 5 C.F.R. § 2634.903(a).		100%	
4.9	Percentage of sampled reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).	61%		
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).		61%	
	COMMENTS			
	 (4.5): Peace Corps does not have an OGE-approved alternative confidential financial disclosure system. (4.7): Only eight of the 17 new entrant reports reviewed by OGE were filed timely. (4.9-4.10): Peace Corps ethics officials reviewed only 25 of the 41 confidential reports examined by OGE within 60 days 	of rec	eipt.	

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.	\boxtimes		
5.2	 Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. 	\boxtimes		
5.3	 Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. 	\boxtimes		
5.4	Where applicable, notice of the time frame for completing initial ethics training.	\boxtimes		
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.	\boxtimes		
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).	\boxtimes		
5.7	The agency's written procedures are reviewed by the DAEO each year. See 5 C.F.R. § 2638.303(c).	\boxtimes		
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.	\boxtimes		
	COMMENTS	•		
	None.			

6	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		Contact information for the agency's ethics office.	\boxtimes			



6.2	• The text of 5 C.F.R. § 2638.103.			
6.3	A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	\boxtimes		
6.4	Other information the DAEO deems necessary.			\boxtimes
6.5	The agency has established written procedures for supervisory ethics notices. See 5 C.F.R. § 2638.306(d).	\boxtimes		
6.6	The agency's written procedures are reviewed by the DAEO each year. See 5 C.F.R. § 2638.306(d).	\boxtimes		
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. See 5 C.F.R. § 2638.306(b).	\boxtimes		
	COMMENTS			
	(6.4): The DAEO did not deem it necessary to include any other information.			
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.	1		•
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).			
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).	\boxtimes		
7.3	The agency has established written procedures for initial ethics training. See 5 C.F.R. § 2638.304(f).	\boxtimes		
7.4	The agency's written procedures are reviewed by the DAEO each year. See 5 C.F.R. § 2638.304(f).		\boxtimes	
	DATA ANALYSIS		%	
7.5	Percentage of new employees who received initial ethics training. See 5 C.F.R. § 2638.304.		100%	
7.6	Percentage of new employees who received initial ethics training within three months of appointment. See 5 C.F.R. § 2638.304(b).		100%	
	COMMENTS			
	(7.4): Ethics officials advised OGE that the DAEO reviews these procedures when there is a change in the way new em (NEO) sessions are conducted or the Ethics Team receives constructive feedback to improve the NEO ethics training. To review these procedures annually. According to ethics officials this requirement has been added to Peace Corps' writ 2021.	ne DAE	O is req	uired
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. <i>See</i> 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).	\boxtimes		



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 a summary of those provisions; such other written materials as the DAEO determines should be included; instruction for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	y or	\boxtimes		
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, a certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	nd	\boxtimes		
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidentifilers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	ial	\boxtimes		
8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pais 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).	y		\boxtimes	
			Traini	ng Forn	nat
	DATA ANALYSIS		Live	Inter	active
	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).	0%	ó	1009	%
8.8	• SES and Equivalent. See 5 C.F.R. § 2638.308(e)(3).	0%	Ó	96%	
	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).			1	
8.9	 Employees required to file an annual confidential financial disclosure report. See 5 C.F.R. § 2638.307(a)(1). 	0%	ó	1009	2 /0
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		•	-	
	(8.5): Peace Corps ethics officials only provide interactive annual training. (8.6): Peace Corps does not have Executive Schedule Level I and Level II officials.				

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).	\boxtimes		
	COMMENTS			
	None.			



10.0	SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES	AND	BOAF	RDS			
	Confidential Financial Disclosure						
10.1	Number of SGEs serving on Advisory Committees and Boards.		0				
	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				
	Ethics Training						
	COMPLIANCE REQUIREMENTS	Yes	No	N/A			
	Required ethics training must be provided to each SGE. See 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. See 5 C.F.R. § 2638.304(e)(1).			\boxtimes			
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).			\boxtimes			
	DATA ANALYSIS		%				
10.7	Percentage of SGEs who received initial ethics training. See 5 C.F.R. § 2638.304.		N/A				
10.8	Percentage of SGEs who received initial ethics training timely. See 5 C.F.R. § 2638.304(b)(2).		N/A				
10.9	Percentage of SGEs who received annual ethics training. See 5 C.F.R. § 2638.307(d)(2).		N/A				
	COMMENTS						
	(10.2-10.9) Peace Corps does not have SGEs serving on Advisory Committees and Boards.						

	RECOMMENDATIONS		
#	Element	RECOMMENDATION	Compliance Due
1	3.9-3.11	RECOMMENDATION: Ensure that public filers are timely notified of their requirement to file. AGENCY RESPONSE: The Peace Corps recognizes the importance of timely notifying public filers of their requirement to file. The Ethics office will continue to make efforts to improve communications systems with the Office of Human Resources, so that the Ethics office is notified of the arrival of public filers in a timely manner.	August 1, 2022
2	3.11	RECOMMENDATION: Make all reasonable efforts to collect the outstanding termination report. AGENCY RESPONSE: The Ethics office has communicated with the public filer whose termination report was not timely collected, has assigned a termination report in Integrity to the individual, and expects the filer to submit a report as required.	September 1, 2021

ETHICS PROGRAM INSPECTION REPORT

Agency: Peace Corps

Report No.: 21-32I

Date: July 7, 2021

Period Covered by Review: January 1, 2020 through April 30, 2021



			<u> </u>
3	3.13	RECOMMENDATION: Ensure that public financial disclosure reports are certified timely. AGENCY RESPONSE: The Peace Corps recognizes the importance of ensuring that public financial disclosure reports are certified timely, and will make every effort to do so in the absence of adequate Ethics office staffing levels.	August 1, 2022
4	4.7	RECOMMENDATION: Ensure that confidential new entrant reports are filed timely. AGENCY RESPONSE: The Peace Corps recognizes the importance of timely notifying confidential filers of their requirement to file. The Ethics office will continue to make efforts to improve communications systems with the Office of Human Resources, so that the Ethics office is notified of the arrival of confidential filers in a timely manner. Additionally, the Ethics office will work with the Office of Human Resources and other offices within the agency to be timely notified when an individual transfers into an "acting" capacity or into a filing position from another role at the agency.	August 1, 2022
5	4.9	RECOMMENDATION: Ensure that confidential reports are certified timely. AGENCY RESPONSE: The Peace Corps recognizes the importance of ensuring that confidential financial disclosure reports are certified timely, and will make every effort to do so in the absence of adequate ethics staffing levels. The Ethics office recently purchased and began utilizing an electronic financial disclosure management system for certifying and tracking reports, but due to technology issues related to the mandatory telework policy during COVID-19, only a small number of filers were able to file using the system during the review period. While implementing the new process, the agency was required to maintain dual tracking systems (paper and electronic), which increased workload on the already limited staff. The agency has resolved these technology issues, and expects that increased usage of the electronic filing system will begin to increase efficiency and improve compliance with timely certification.	August 1, 2022
6	8.5	RECOMMENDATION: Ensure that the Director, as a covered public filer, completes live annual ethics training at least once every two years. See 5 C.F.R. § 2638.308(e)(2). AGENCY RESPONSE: The Peace Corps recognizes that the Director and Deputy Director of the agency are required to complete live annual ethics training at least once every two years, and will ensure that training SOPs and calendar tracking are updated with reminders to ensure compliance with this requirement.	August 1, 2022