

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Advisory Council on Historic Preservation

Follow-up to OGE Report Number: 22-42I

Report No.: 25-84IF

Date: August 22, 2025

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

In 2022, the Office of Government Ethics OGE reviewed of the Advisory Council on Historic Preservation's ethics program. As a result, OGE issued four recommendations to address deficiencies identified during the review. In 2024, OGE conducted a follow-up review to assess whether ACHP had taken sufficient action to resolve the deficiencies underlying these recommendations. During the 2024 follow-up review, two of the four recommendations were closed. OGE conducted a second follow-up review in 2025 which resulted in closing the remaining open recommendations. The findings of the 2025 follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Make all reasonable efforts to collect a termination report from the former Chairman. If unable to collect the termination report, refer the Chairman to the Department of Justice for failure to file the report. Either assess or waive the applicable late filing fee.	ACHP satisfied the requirements outlined in the recommendation and provided OGE with a copy of the referral which the agency submitted via email to the Department of Justice on August 6, 2025.	Closed
2	Ensure that all special government employees serving on the board receive sufficient ethics training in a timely manner as required.	<p>This recommendation was issued based on training completion rates and a finding that the training materials did not include the Standards of Ethical Conduct as required by 5 C.F.R. § 2638.304(e)(2).</p> <p>Based on a review of the training materials and tracking documentation covering 2024, OGE found that 100% (3 out of 3) of new SGE members received sufficient and timely initial ethics training upon being sworn in by the agency. In addition, 83% (5 out of 6) of reappointed SGE members received annual ethics training timely. Lastly, ACHP's annual ethics training template includes a link to the Standards of Ethical Conduct on ACHP's webpage.</p>	Closed

Based on the results of OGE's follow-up review all recommendations are closed.