

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



May 1, 2018

Joseph A. Pollard  
General Counsel and  
Designated Agency Ethics Official  
Armed Forces Retirement Home  
3700 N. Capitol Street, NW.  
Washington, DC 20011

Dear Mr. Pollard:

As a result of its review of the Armed Forces Retirement Home (AFRH) ethics program, the Office of Government Ethics (OGE) issued 6 recommendations in its June 2017 review report. OGE recently conducted a follow-up review to assess whether AFRH has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Update agency written policies and procedures governing collection, review, evaluation and, where appropriate, the public availability of financial disclosure reports in accordance with 5 U.S.C. app. IV, § 402(d)(1). Ensure that these policies and procedures also address periodic transaction reports.	AFRH updated agency written policies and procedures to comply with applicable requirements, including those related to periodic transaction reports.	Closed
2	Ensure late filing fees are collected or fee waivers are issued when public filers do not timely file financial disclosure reports.	A total of six public financial disclosure reports were required to be filed in 2017. AFRH could only produce five of the reports, all of which were filed timely. AFRH ethics officials must collect the outstanding report and, if necessary, either collect the late filing fee or issue a waiver of the fee.	Open

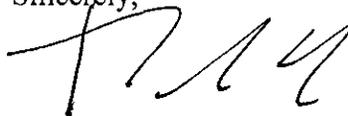
Report No. 18-27IF



3	Collect the outstanding termination public financial disclosure report required to be filed in 2016 or refer the former employee to DOJ for failure to file.	The outstanding report has been collected.	Closed
4	Ensure public financial disclosure reports are certified within 60 days of the date of filing.	A total of six public financial disclosure reports were required to be filed in 2017. AFRH could only produce five of the reports. OGE reviewed the five public financial disclosure reports and determined they were all certified timely.	Closed
5	Ensure new entrant confidential financial disclosure report filers are identified timely and that their reports are filed timely.	No new entrant confidential reports were required to be filed in 2017. OGE will assess AFRH's progress in complying with this recommendation during the next follow-up review.	Open
6	Create an effective process to ensure that covered employees receive annual ethics training in accordance with OGE's training regulations at 5 C.F.R. part 2638.	AFRH conducts annual ethics training on a quarterly basis. All covered employees received annual ethics training in 2017.	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher  
Deputy Director for Compliance