

ETHICS PROGRAM INSPECTION REPORT

Agency: Consumer Product Safety Commission

Report No.: 19-361

Date: September 4, 2019

Period Covered by Review: January 1 through December 31, 2018

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
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1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	521
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	5
1.3	Number of non-PAS public financial disclosure reports required to be filed.	33
1.4	Number of confidential financial disclosure reports required to be filed.	378
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.6	Grade level of DAEO.	SES
1.7	Title of Alternate DAEO (ADAEO).	Assistant General Counsel for General Law
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Assistant General Counsel for General Law
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.	5
1.13	Number of reporting levels between the DAEO and the agency head.	1
COMMENTS		
None		

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"/>
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: <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"/>

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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 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"/>
DATA ANALYSIS		%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	100%		
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(e).	100%		
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).	95%		
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).	95%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%		
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).	100%		
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).	100%		
COMMENT				
<p>(3.1) At the time of inspection, the written procedures that OGE examined did not include procedures for the filing, review, or certification of the OGE Form 278-T. According to ethics officials, these procedures are included in the revised directives and implementing procedures that are currently in the clearance process.</p> <p>(3.4) CPSC had no public financial disclosure report filers who were subject to the late filing fee or a waiver of the fee during the period of review.</p>				

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

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).				
4.1	<ul style="list-style-type: none"> Collection of confidential financial disclosure reports. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	<ul style="list-style-type: none"> Review/evaluation of confidential financial disclosure reports. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	DATA ANALYSIS	%
4.7	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).	95%
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).	97%
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).	90%
COMMENTS		
(4.5) CPSC does not have an OGE-approved alternative confidential financial disclosure system.		

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	<ul style="list-style-type: none"> • A statement regarding the agency's commitment to government ethics. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> • Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"> • Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> • Where applicable, notice of the timeframe for completing initial ethics training. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> • Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.6	The agency has established written procedures for issuing the notice to prospective employees. See 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. See 5 C.F.R. § 2638.303(c).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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. See 5 C.F.R. § 2638.303.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
(5.6) In 2017, when OGE promulgated the requirement to provide this notice to prospective employees, the Ethics Office provided detailed information and instructions to their Human Resource office which adequately explained the relevant requirements. OGE notes that at the time of its inspection, CPSC had pending, draft procedures for issuing notices to prospective employees. Prior to the conclusion of OGE's review, CPSC finalized these procedures. As a result, OGE is making no formal recommendation.				

6.0 Notices to New Supervisors				
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
The agency provides each employee upon initial appointment to a supervisory position with: See 5 C.F.R. § 2638.306.				
6.1	<ul style="list-style-type: none"> • Contact information for the agency's ethics office. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"> • The text of 5 C.F.R. § 2638.103. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none"> • A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"> • Other information the DAEO deems necessary. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. See 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. See 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
(6.5) In 2017, when OGE promulgated the requirement to provide notices to new supervisors, the Ethics Office provided detailed information and instructions to their Human Resource office which adequately explained the relevant requirements. OGE notes that at the time of its inspection, CPSC had pending, draft procedures for issuing notices to new supervisors. Prior to the conclusion of OGE's review, CPSC finalized these procedures. As a result, OGE is making no formal recommendation.				

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</i> 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. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input checked="" type="checkbox"/>	<input 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</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).	<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</i> 5 C.F.R. § 2638.304(f).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
DATA ANALYSIS				%		
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	100%				
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	100%				
COMMENTS						
(7.3) At the time of OGE's inspection, CPSC had pending, draft written procedures for initial ethics training. Prior to the conclusion of OGE's review, CPSC finalized these procedures. As a result, OGE is making no formal recommendation.						

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. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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. <i>See</i> 5 C.F.R. § 2638.308(f)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

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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. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		Training Format		
		Live	Interactive	
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a).				
8.6	<ul style="list-style-type: none"> Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1). 	N/A	N/A	
8.7	<ul style="list-style-type: none"> Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2). 	50%	50%*	
8.8	<ul style="list-style-type: none"> SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). 	73%	27%*	
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a)(d).				
8.9	<ul style="list-style-type: none"> Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1). 	74%	26%*	
8.10	<ul style="list-style-type: none"> Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 	N/A	N/A	
8.11	<ul style="list-style-type: none"> Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). 	N/A	N/A	
8.12	<ul style="list-style-type: none"> Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3). 	100%	N/A	
8.13	<ul style="list-style-type: none"> Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4). 	N/A	N/A	
COMMENTS				
<p>(8.3) To satisfy the annual training requirement in 2018, live in-person training was provided to both public and confidential filers. Since many of the agency's workforce work from their homes throughout the country, many additional employees were also able to participate in the training via live webcasting. Employees unable to participate in the live training in real-time were required to view a recording of the live training via Video on Demand. Based on the live training and interactive training definitions at 5 C.F.R. §§ 2638.302(a) and 2638.302(b), OGE does not consider the viewing of the recorded training presentation via Video on Demand to meet the definition of live or interactive training. Therefore, OGE recommends that the Ethics Office comply with the format requirements for public filers, confidential filers, and certain other employees in all future trainings.</p> <p>(8.7) Of the four PAS officials who were required to receive annual training during the period covered by the review, OGE determined that two received live training and two received training via the Video on Demand.</p> <p>(8.8) Of the 26 non-PAS public reports filers who were required to receive annual training during the period under review, all received either live in-person training, live webcasting training, or received training via Video on Demand.</p> <p>(8.9) Of the 349 confidential filers who were required to receive annual training during the period under review, all received either live-in-person training, live webcast training or received training via Video on Demand.</p> <p>*As noted above, OGE determined that the training CPSC provided as interactive training did not meet all format requirements. However, OGE acknowledges that all employees required to receive annual training did receive substantive training that addressed the required content.</p>				

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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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
None				

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.	0
DATA ANALYSIS		%
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

COMPLIANCE REQUIREMENTS		Yes	No	N/A
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"/>
DATA ANALYSIS		%		
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		
COMMENTS				
(10.1 – 10.9) CPSC did not have any SGEs serving on advisory committees or boards during the period under review.				

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
5.6	<u>ISSUE</u> : Written procedures for issuing notices to prospective employee were pending finalization. <u>OGE COMMENT</u> : CPSC finalized the required procedures prior to the conclusion of OGE's review.
6.5	<u>ISSUE</u> : Written procedures for issuing supervisory ethics notices were pending finalization. <u>OGE COMMENT</u> : CPSC finalized the required procedures prior to the conclusion of OGE's review.

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7.3

ISSUE: Written procedures for issuing initial ethics training were pending finalization.

OGE COMMENT: CPSC finalized the required procedures prior to the conclusion of OGE's review.

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	8.3	<p>RECOMMENDATION: Ensure that annual ethics training complies with the format requirements for public filers, confidential filers and certain other employees as required by 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</p> <p>AGENCY RESPONSE: 5 C.F.R. §§ 2638.307 and 2638.308 require confidential financial disclosure filers and public financial disclosure filers, respectively, to complete ethics training on an annual basis. At CPSC, no filers are required to receive live training; all may satisfy the annual requirement through interactive training. However, the interactive training requirement may be met through live training. 5 C.F.R. § 2638.302(b). CPSC's ethics team strongly prefers the use of live training, finding that the visibility of the ethics officials generates increased active participation in the ethics program. In 2018, CPSC's ethics team used a question-and-answer approach to communicate its message through a combination of live and interactive training. This approach proved to be highly effective in raising ethics awareness and feedback.</p> <p>Despite CPSC's preference for live training, not every employee is able to view the training live. CPSC is geographically a wide-ranging agency. Approximately half of CPSC's employees work at two facilities in Maryland; the remainder are located throughout the entire United States and most telework full-time. Due to geographic dispersion, time zone differences, employees on leave, and other exigencies, it is impractical for every confidential and public financial disclosure filer to receive live training. CPSC instead uses interactive training for employees who cannot view the live training. This interactive training consists of a video recording of the live training made available as a Video on Demand. The Video on Demand includes questions, answers, and instructions for contacting ethics officials with any questions or requests for personalized feedback.</p> <p>CPSC believes the Video on Demand satisfies the interactive requirement as defined in 5 C.F.R. § 2638.302(b). Example 4 in the regulation identifies the distribution of a training presentation, questions, answers, and instructions for contacting ethics officials as an acceptable format for interactive training. CPSC's Video on Demand provides the same material as Example 4. CPSC's ethics team provides in the Video on Demand a PowerPoint with questions and answers. The Video on Demand also includes instructions for contacting ethics officials for further information. Based on the example provided in 5 C.F.R. § 2638.302(b), CPSC believes its Video on Demand meets the interactive requirement and thus all employees who reviewed the Video on Demand fulfilled their annual training requirement. CPSC's mixed live and interactive approach has proven highly successful in disseminating ethics information and awareness over the years. CPSC ethics officials receive positive feedback not just from the live viewers, but also from those employees who receive the interactive portion of the training. Year after year, employees contact ethics officials after viewing the presentation to ask questions, regardless of whether they participated via in person, the live webcast, or the Video on Demand.</p> <p>CPSC appreciates that there is always room for improvement in its program and, with the goal of strengthening its ethics training, will increase the interactive component of its Video on Demand. Future annual ethics trainings will include with the Video on Demand additional multiple choice questions for employees to answer. CPSC will do this through computer software that prompts employees with questions during and/or after the Video on Demand. After an employee inputs an answer, the software will show the employee whether the selection was correct or incorrect. When the employee's selection is incorrect, the software will display the correct answer and explain the relevant concepts. These questions will involve the employee's use of knowledge gained through the training.</p>	December 2020