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| Agency: Harry S. Truman Scholarship Foundation | |
| Report No.: 18-451 | Date: September 5, 2018 |
| Period Covered by Review: January 2017 through December 2017 | |

| 1.0 AGENCY DATA | | |
|---|---|----------------------------|
| EMPLOYEES | | |
| 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 | 0 |
| 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. | 0 |
| ETHICS PROGRAM | | |
| 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 |
| COMMENTS | | |
| <p>(1.2) The Harry S. Truman Scholarship Foundation (Foundation) does not have any PAS officials required to file public financial disclosure reports. The Foundation's enabling statute (Public Law 93-642) provides for a 13-member Board of Trustees.</p> <p>This board consists of eight members, who are appointed by the President with the advice and consent of the Senate; 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. Board members are designated to serve as representatives of a certain group of people (e.g., "Representative of Higher Education") and provide that viewpoint during board meetings. Therefore, since the Foundation's inception, the eight members that are appointed by the President with the advice and consent of the Senate have been considered representatives and not special Government employees (SGEs). 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 Executive Director/DAEO is the Foundation's only public financial disclosure filer.</p> <p>(1.4) No Foundation employees were required to file a confidential report during the period under review.</p> | | |

| 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. § 2638.202(c). | | <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. § 2638.202(c). | | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| COMMENTS | | | | | |
| None | | | | | |

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| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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). | | | | 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(e). | | | | 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). | | | | 100% |
| 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 |
| COMMENTS | | | | | |
| <p>(3.4) The one public report filed at the Foundation--the Executive Secretary/DAEO's--was not subject to the late filing fee or a waiver of the fee during the period of review.</p> <p>(3.7) The Foundation's human resource services are handled by the Department of the Interior. Nonetheless, during the period covered by the review, the Foundation did not have any new employees who were required to file a public financial disclosure report.</p> <p>(3.8) During the period under review, the Foundation did not have any terminations of employees in positions that required them to file a public financial disclosure report.</p> <p>(3.14-3.17) The Foundation does not have any PAS officials required to file a public financial disclosure report.</p> | | | | | |

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| 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 | • 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"/> | |
| DATA ANALYSIS | | | % | | |
| 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 | | | |
| 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 | | | |
| COMMENTS | | | | | |
| (4.1 - 4.10) The Foundation has historically had no employees who are required to file a confidential financial disclosure report and had no confidential filers in the period covered by OGE's review. | | | | | |

| 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 | • A statement regarding the agency's commitment to government ethics. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5.2 | • Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5.3 | • Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5.4 | • Where applicable, notice of the time frame for completing initial ethics training. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 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. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" 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 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. <i>See</i> 5 C.F.R. § 2638.303. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

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| COMMENTS | |
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| | <p><u>Concerns</u> (5.1 - 5.5) As noted, the Foundation's human resource services are handled by the Department of the Interior, including the provision of offer letters to prospective employees. During the period covered by OGE's review, the Foundation had one new employee and one summer intern come into the agency. At the time on OGE's review, the ADAEO was not sure whether the agency's offer letters included all of the content requirements of § 2638.303.</p> <p>(5.6 - 5.8) At the time of OGE's review, the Foundation had not established written procedures or an effective process for issuing notices to prospective employees.</p> |

| 6.0 Notices to New Supervisors | | Yes | No | N/A |
|---|---|--------------------------|-------------------------------------|-------------------------------------|
| COMPLIANCE REQUIREMENTS | | | | |
| 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 | • Contact information for the agency's ethics office. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6.2 | • The text of 5 C.F.R. § 2638.103. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6.3 | • A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6.4 | • Other information the DAEO deems necessary. | <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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |
| COMMENTS | | | | |
| <p>(6.1 - 6.4) The only two employees with supervisory duties at the Foundation are the DAEO and ADAEO. Since both the DAEO and ADAEO have been with the agency for a number of years, no initial appointments to supervisory positions were made in during the period under review.</p> <p><u>Concern</u> (6.5) At the time of OGE's review, the Foundation had not established written procedures for issuing ethics notices to new supervisors.</p> | | | | |

| 7.0 Initial Ethics Training | | Yes | No | N/A |
|--|--|-------------------------------------|-------------------------------------|-------------------------------------|
| COMPLIANCE REQUIREMENTS | | | | |
| 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"/> |

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| | 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 | | |
| | <u>Concern</u> (7.3 – 7.4) At the time of examination, the Foundation had not established written procedures for initial ethics training. However, prior to the conclusion of OGE’s review written procedures were established. 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. § 2638.304(e)(2). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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. §§ 2638.307(d) and 2638.308(e). | <input checked="" type="checkbox"/> | <input 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"/> |
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 | • Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1). | N/A | N/A | |
| 8.7 | • Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2). | N/A | N/A | |
| 8.8 | • SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). | 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</i> 5 C.F.R. § 2638.307(a)(d). | | | |
| 8.9 | • Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1). | N/A | N/A | |
| 8.10 | • Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). | N/A | N/A | |
| 8.11 | • 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 | • Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3). | N/A | N/A | |
| 8.13 | • Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4). | N/A | N/A | |

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| COMMENTS | |
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| | <p>(8.2) As the head of the agency's ethics program and its only public filer required to receive annual ethics training, the DAEO is already aware of the Standards and criminal conflicts of interest, so it is understandable if the Standards and conflict of interest statutes are not provided to the DAEO each year. (In 2017, they were not provided to the DAEO, according to the ADAEO) However, as a good management practice and since the Foundation trains all employees, the ADAEO agreed to begin to provide the required written material to all trainees, including the DAEO.</p> <p>(8.6) The Foundation does not have any Executive Schedule Level I and Level II employees.</p> <p>(8.7) The Foundation does not have any other PAS and equivalent employees required to file public financial disclosure reports.</p> <p>(8.8) The Foundation's DAEO, who is the agency's only public filer, is an SES employee.</p> |

| 9.0 ETHICS ADVICE AND COUNSELING | | Yes | No | N/A |
|----------------------------------|--|--------------------------|--------------------------|-------------------------------------|
| COMPLIANCE REQUIREMENT | | | | |
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| COMMENTS | | | | |
| | (9.1) According to the ADAEO, the Foundation did not provide any written ethics counseling during the period under review. | | | |

| 10.0 Special Government Employees (SGE) Serving on Advisory Committees and Boards | | Yes | No | N/A |
|--|--|--------------------------|--------------------------|-------------------------------------|
| 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. <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 | | | | |
| 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 |

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| COMMENTS | |
|---|--|
| (10.1 - 10.9) The Foundation does not have any SGEs serving on advisory committees or boards. | |

| RECOMMENDATION(S) | | | |
|-------------------|-----------|---|----------------|
| # | Element | RECOMMENDATION | Compliance Due |
| 1 | 5.1 - 5.5 | <u>RECOMMENDATION:</u> Ensure that written offers of employment for positions covered by the Standards of Conduct provide the content requirements provided at 5 C.F.R. § 2638.303. | December 2018 |
| 2 | 5.6 | <u>RECOMMENDATION:</u> Establish written procedures for issuing the notice to prospective employees as required by 5 C.F.R. § 2638.303(c). | December 2018 |
| 3 | 6.5 | <u>RECOMMENDATION:</u> Establish written procedures for supervisory ethics notices as required by 5 C.F.R. § 2638.306(d). | December 2018 |

| AGENCY RESPONSE | | | |
|---|--|--|--|
| <p>The Foundation agrees with all recommendations. We are in the process of working with our personnel servicing agency to see how best to add notices into the written offers of employment and notices to prospective employees. We anticipate having this matter worked out before we bring on our next hire (which is projected to be next year). We are also working to add written procedures for supervisory ethics notices to our general ethics policy document.</p> | | | |