

Agency: Barry M. Goldwater Scholarship and Excellence in Education Foundation	
Report No.: 18-47I	Date: September 13, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	2
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		
1.4	Title of Designated Agency Ethics Official (DAEO).	President/Executive Secretary
1.5	Grade level of DAEO.	Non-Career SES
1.6	Title of Alternate DAEO (ADAEO).	Executive Administrator
1.7	Grade level of ADAEO.	AD (GS13 Equivalent)
1.8	Title of the primary, day-to-day ethics program administrator.	Executive Administrator
1.9	Grade level of the primary, day-to-day ethics program administrator.	AD (GS13 Equivalent)
1.10	Current number of full-time ethics officials.	0
1.11	Current number of part-time ethics officials.	2
1.12	Number of reporting levels between the DAEO and the agency head.	Agency head serves as DAEO
COMMENTS		
<p>(1.2) The Barry Goldwater Scholarship and Excellence in Education Foundation (Foundation) does not have any PAS officials. The Foundation was established as a scholarship program to foster and encourage excellence in science and mathematics and provides for a 13-member Board of Trustees.</p> <p>When all positions are occupied, the Board of Trustees is comprised of 13 members. Eight members are appointed by the President with the advice and consent of the Senate; two members from the Senate; two members from the House of Representatives; and the Secretary of Education or designee, who serves as an ex officio member, but is not eligible to serve as Chairman. In 1995, the Office of General Counsel for the Department of Education issued an ethics opinion in which it determined that the eight members of the Board who are appointed by the President with the advice and consent of the Senate are SGEs. However, the opinion stated that the members are excluded from the financial disclosure reporting requirement because the duties of their positions made remote the possibility that they would be involved in any real or apparent conflict of interest. Currently, the Board of Trustees consists of seven members and the President/Executive Secretary. The seven members file new entrant confidential reports with the Executive Office of the President when they first assume their positions.</p> <p>(1.3) The President/Executive Secretary/DAEO is the Foundation's only public financial disclosure filer.</p>		

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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					

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).	0%			
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			

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COMMENTS
<p>(3.4) The one public report filed at the Foundation was not subject to the late filing fee or a waiver of the fee during the period of the review.</p> <p>(3.7-3.8) The Foundation’s human resources services are managed by the General Services Administration (GSA). During the period covered by inspection, the Foundation had no employees who were required to file a new entrant public financial disclosure report or departing employees who were required to file a termination report.</p> <p>(3.13) The Foundation had only one non-PAS public report filer in 2017 and 2018. The filer’s 2017 report was certified late. However, OGE notes that the filer’s 2018 report was certified timely.</p> <p>(3.14-3.17) The Foundation does not have any PAS officials who are required to file a public financial disclosure report.</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	• Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.2	• 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 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 had no confidential filers during the period covered by OGE’s inspection.					

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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	<ul style="list-style-type: none"> A statement regarding the agency’s commitment to government ethics. 				<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> Where applicable, notice of the time frame for completing initial ethics training. 				<input type="checkbox"/>	<input checked="" 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 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 checked="" type="checkbox"/>	<input 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"/>
COMMENTS							
<p><u>Concerns</u> (5.1-5.5) As noted, the Foundation’s human resources services are managed by GSA, including the provision of offer letters to prospective employees. During the period covered by OGE’s review, the Foundation had no prospective employees. The Foundation could not confirm that the required notice to prospective employees would be included in offer letters provided by GSA. The Foundation must ensure that GSA includes appropriate notice in the offers of employment it provides to prospective employees.</p> <p>(5.6 – 5.8) At the time of OGE’s inspection, the Foundation had not established written procedures or an effective process for issuing notices to prospective employees.</p>							

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: <i>See</i> 5 C.F.R. § 2638.306.							
6.1	<ul style="list-style-type: none"> Contact information for the agency’s ethics office. 				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"> The text of 5 C.F.R. § 2638.103. 				<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"> Other information the DAEO deems necessary. 				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

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COMMENTS	
	(6.1 - 6.7) The Foundation's only supervisory position is that of the President/Executive Secretary, who also serves as the DAEO. Therefore, OGE does not find it necessary to issue a recommendation concerning the lack of a notice to new supervisors.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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(f)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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.				N/A		
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).				N/A		
COMMENTS							
(7.1-7.4) The Foundation had no new employees in 2017. The ADAEO would provide any new employee with all required materials. (7.3-7.4) At the time of OGE's inspection, the Foundation had not established written procedures for initial ethics training. (7.5-7.6) The Foundation had no new employees in 2017.							

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(e)(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. §§ 2638.307(d) and 2638.308(e).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employee Information and Annual Ethics Training		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	
COMMENTS				
<p>(8-1-8.4) As the manager 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 of Conduct and financial conflicts of interest. Nonetheless, the ADAEO provides annual training to the DAEO and SGEs during the annual meeting of the Board of Trustees and provides the required written materials, as well.</p> <p>(8.5) The DAEO is the only public filer at the Foundation.</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			
	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 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.				

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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.	7
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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).	100%		
COMMENTS				
(10.1-10.4) The seven members of the Foundation's Board of Trustees are excluded from financial disclosure reporting requirements. (10.7-10.8) The Foundation did not have any new SGEs who were required to receive initial ethics training during the period covered by the inspection. (10.5-10.6) Live annual ethics training was provided on March 16, 2017, during the 2017 annual meeting of the Board of Trustees.				

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 required content. <i>See</i> 5 C.F.R. § 2638.303. <u>AGENCY RESPONSE:</u> BGSF will work with OGE and GSA to address and resolve the issues raised by the report's recommendations	November 13, 2018
2	5.6	<u>RECOMMENDATION:</u> Establish written procedures for issuing the required notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c)	November 13, 2018

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		<u>AGENCY RESPONSE:</u> BGSF will work with OGE and GSA to address and resolve the issues raised by the report's recommendations	
3	7.3	<u>RECOMMENDATION:</u> Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f). <u>AGENCY RESPONSE:</u> BGSF will work with OGE and GSA to address and resolve the issues raised by the report's recommendations	November 13, 2018