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| Agency: Commission for the Preservation of America's Heritage Abroad | |
| Report No.: 18-52I | Date: September 19, 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 non-PAS public financial disclosure reports required to be filed. | 1 |
| 1.3 | Number of confidential financial disclosure reports required to be filed. | 19 |
| ETHICS PROGRAM | | |
| 1.4 | Title of Designated Agency Ethics Official (DAEO). | Administrative Director |
| 1.5 | Grade level of DAEO. | GS-15 |
| 1.6 | Title of Alternate DAEO (ADAEO). | Administrative Assistant |
| 1.7 | Grade level of ADAEO. | GS-7 |
| 1.8 | Title of the primary, day-to-day ethics program administrator. | Administrative Director |
| 1.9 | Grade level of the primary, day-to-day ethics program administrator. | GS-15 |
| 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. | 1 |
| COMMENTS | | |
| None | | |

| 2.0 LEADERSHIP | | Yes | No | N/A |
|--------------------------------|--|-------------------------------------|--------------------------|--------------------------|
| COMPLIANCE REQUIREMENTS | | | | |
| 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) | | Yes | No | N/A |
|--|--|-------------------------------------|-------------------------------------|-------------------------------------|
| COMPLIANCE REQUIREMENTS | | | | |
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3.2 | • Review/evaluation of public financial disclosure reports. | <input type="checkbox"/> | <input checked="" 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 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). | 0% | | |
| 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 | | |
| COMMENTS | | | | |
| <p>(3.1, 3.9-3.17) The Commission for the Preservation of America's Heritage Abroad's (CPAHA) written procedures governing the administration of the public financial disclosure system are written specifically to address only the DAEO's report; the DAEO position is the only position within CPAHA whose incumbent is required to file a public financial disclosure report. As a result, the written procedures do not address how the report is to be collected or reviewed. Because CPAHA's only public filer is the DAEO, OGE finds it unnecessary to issue a recommendation regarding the agency's written procedures. However, OGE reminds CPAHA that should additional covered positions be created, the written procedures will have to be amended accordingly.</p> <p>CPAHA Response: CPAHA will amend the written procedures to include how reports are collected and reviewed as well as include a statement related filing a public financial disclosure report for a non-DAEO, in the unlikely event, an additional covered position is created.</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 type="checkbox"/> | <input checked="" 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 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"/> |

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| 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"/> |
| 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 | | | | |
| <p>(4.1) CPAHA has procedures for the collection of confidential financial disclosure reports; however, they incorrectly state the due dates for confidential reports.</p> <p>(4.5) CPAHA does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>(4.7-4.10) CPAHA's only confidential financial disclosure report filers are special Government employees (SGE). (<i>See</i> Section 10.0)</p> <p>CPAHA Response: CPAHA will amend the written procedures to include the correct due dates. CPAHA is unaware of what might constitute an OGE-approved alternative confidential financial disclosure system.</p> | | | | |

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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 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 time frame 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 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>(5.1-5.4) CPAHA did not have a notice to distribute to prospective employees prior to OGE's review. CPAHA has a contract with the General Services Administration (GSA) to provide personnel-related services, but the requirement to provide the notice to prospective employees was not incorporated into GSA's process for hiring employees. However, during OGE's review, CPAHA developed a notice to be provided to prospective CPAHA employees.</p> <p>(5.5) The notice to new employees developed by CPAHA during OGE's review contained a statement that would be provided to someone entering the DAEO position, CPAHA's only public filing position. However, the notice did not contain a statement applicable to confidential filers.</p> <p>(5.6, 5.7) CPAHA does not have written procedures for issuing notices to prospective employees.</p> | | | | |

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The documents mentioned above were developed by CPAHA and are on CPAHA letterhead. Since all past requests to GSA to incorporate ethics guidance have not been accommodated, CPAHA will conduct a separate onboarding with new employees which will include ethics guidance. The materials that CPAHA developed will be shared with new employees and new supervisors at that time.

Since CPAHA pays GSA to develop our job announcements, we can request that GSA include a statement/notice to prospective new employees in the job announcement. The statement would be similar to that in one of the aforementioned letters.

| 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 5 C.F.R. § 2638.306.</i> | | | | | | |
| 6.1 | • Contact information for the agency's ethics office. | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.2 | • The text of 5 C.F.R. § 2638.103. | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.3 | • 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 | • 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 5 C.F.R. § 2638.306(d).</i> | | | <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 5 C.F.R. § 2638.306(d).</i> | | | <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 5 C.F.R. § 2638.306(b).</i> | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| COMMENTS | | | | | | |
| <p>(6.1-6.4) CPAHA has a template notice for new supervisors; however, the agency has not hired a new supervisor or promoted/transferred any current employee into a supervisory position since the requirement became effective.</p> <p>(6.5-6.7) CPAHA does not have written procedures for supervisory ethics notices.</p> <p>CPAHA Response: It should be noted that USCPAHA only has appropriations to support two federal employees and that other than the Chairman of the Commission no SGE/Commission Members have any supervisory roles or responsibilities.</p> <p>With OGE guidance, CPAHA can develop written procedures for supervisory ethics notices.</p> | | | | | | |

| 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 5 C.F.R. § 2638.304.</i> | | | | | | |
| 7.1 | The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i> | | | <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 5 C.F.R. § 2638.304(e)(2).</i> | | | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 7.3 | The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i> | | | <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 5 C.F.R. § 2638.304(f).</i> | | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| | DATA ANALYSIS | % |
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| 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 | | |
| <p>(7.1-7.2) In 2017, CPAHA did not have an Initial Ethics Training (IET) presentation prepared for new employees. The Chairman, the only new employee in 2017, was trained by the OGE Desk Officer assigned to the agency. The OGE Desk Officer also provided the required written materials.</p> <p>(7.3) CPAHA's procedures for IET do not provide for IET which would meet the requirements for interactive training.</p> <p>(7.4) CPAHA's written procedures were not reviewed by the DAEO in the past year.</p> <p>(7.5, 7.6) As noted, the Chairman, the only new employee in 2017, was trained by the OGE Desk Officer assigned to the agency.</p> | | |

| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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). | | | | N/A | 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 | |

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| 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 | | | |
| (8.1-8.13) The only CPAHA employees who are required to receive annual ethics training are the agency's Presidentially appointed SGEs. (<i>See</i> Section 10.0.) (8.10) The training provided to the Presidentially appointed SGEs at CPAHA is discussed in Section 10.0 below. | | | |

| 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| COMMENTS | | | | | | |
| (9.1) CPAHA could not provide OGE with any samples of ethics advice and counseling. Ethics officials indicated that a contractor may have provided advice and counseling to CPAHA employees via phone and email, but could not provide any documentation to verify that advice and counseling had been provided. OGE reminds CPAHA ethics officials that providing advice and counseling is an inherently governmental function that must be performed by a federal employee, as stated in OGE advisory DO-03-011. CPAHA was previously advised of this requirement during OGE's last review of the agency's ethics program in March 2014. | | | | | | |

| 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. | 20 |
| DATA ANALYSIS | | % |
| 10.2 | Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b). | 20% |
| 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). | 0% |
| 10.4 | Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 0% |

| 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 checked="" 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"/> |

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| 10.7 | Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304. | 100% |
| 10.8 | Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2). | 100% |
| 10.9 | Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2). | Could Not Determine |
| COMMENTS | | |
| (10.2-10.4) CPAHA was only able to provide to OGE for examination 10 of the 20 confidential financial disclosure reports required to be filed in 2017. Of those 10 reports, 8 (80%) were not filed timely and none were reviewed or certified within 60 days of being filed. (10.5, 10.9) CPAHA could not provide records documenting AET provided in 2017. CPAHA ethics officials stated that the agency's SGEs received AET during their annual meeting or over the phone. However, tracking and documentation was limited and OGE could not determine who received training or whether the training met format requirements. | | |

| RECOMMENDATIONS | | | |
|-----------------|---------------------|--|----------------|
| # | Element | RECOMMENDATION | Compliance Due |
| 1 | 3.12, 3.13 | <u>RECOMMENDATION:</u> Ensure public financial disclosure reports are reviewed and certified timely. <u>AGENCY RESPONSE:</u> CPAHA will ensure that the only public financial disclosure, as filed by the DAEO, will be reviewed and certified in a timely manner. <u>OGE COMMENT:</u> | |
| 2 | 4.1 | <u>RECOMMENDATION:</u> Update written policies and procedures for the collection of confidential financial disclosure reports. <u>AGENCY RESPONSE:</u> CPAHA will update written policies and procedures for the collection of confidential disclosure reports. <u>OGE COMMENT:</u> | |
| 3 | 5.5-5.8, 6.5-6.8 | <u>RECOMMENDATION:</u> Update written policies and procedures for notices to prospective employees and notices to new supervisors. <u>AGENCY RESPONSE:</u> CPAHA provided OGE with templates of notices for prospective employees and new supervisors in May 2018. CPAHA will update written policies and procedures to ensure that new prospective employees and new supervisors receive the appropriate ethics notices. <u>OGE COMMENT:</u> | |
| 4 | 8.1, 8.3- 8.5 | <u>RECOMMENDATION:</u> Ensure Annual Ethics Training is provided, documented, and tracked, and that the format of the training meets applicable requirement. <u>AGENCY RESPONSE:</u> CPAHA will update written policies and procedures to include how Annual Ethics Training is to be provided, documented, and tracked so that the applicable requirement is met. <u>OGE COMMENT:</u> | |

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| Agency: Commission for the Preservation of America's Heritage Abroad | |
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| 5 | 9.1 | <p><u>RECOMMENDATION:</u> Ensure that required advice and counseling services are available to employees, and provided by a federal employee.</p> <p><u>AGENCY RESPONSE:</u> As of April 2018, CPAHA's Designated Agency Ethics Official (DAEO) and Alternate Designated Agency Ethics Official (ADAEO) are federal employees. The recently appointed DAEO and ADAEO have attended a number of ethics training provided by OGE. CPAHA will ensure that advice and counseling services are available to employees and provided by a federal employee.</p> <p><u>OGE COMMENT:</u></p> | |
| 6 | 10.2-10.4 | <p><u>RECOMMENDATION:</u> Ensure collection, review and certification of SGE's confidential financial disclosure reports are timely and collect or otherwise locate the outstanding reports for 2017.</p> <p><u>AGENCY RESPONSE:</u> CPAHA will ensure that the collection, review and certification of SGE's confidential financial disclosure reports are timely. CPAHA will also collect or otherwise locate outstanding reports for 2017.</p> <p><u>OGE COMMENT:</u></p> | |