

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Armed Forces Retirement Home (AFRH)

Follow-up to OGE Report Number: 22-49I and 23-41F

Report No.: 24-31IF

Date: March 19, 2024

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**Preventing Conflicts of Interest  
in the Executive Branch

As a result of its inspection of the Armed Forces Retirement Home's (AFRH) ethics program, the Office of Government Ethics (OGE) issued five recommendations in its August 2022 inspection report. OGE conducted a follow-up review in June 2023 but was not able to close the five recommendations at that time. OGE conducted a second follow-up review intermittently between October and December 2023 to assess whether AFRH had taken sufficient action to close the five recommendations. The results of our second follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Update the agency's written notice to prospective employees to include the DAEO's contact information.	During the second follow-up review, OGE examined a written offer letter issued to a prospective AFRH employee in July 2023 and found the letter to include all required content information, including the DAEO's contact information.	Closed
2	Update the written notice to prospective employees to include an explanation that new entrant reports must be filed within 30 days of appointment, as appropriate.	OGE found the July 2023 written offer letter referenced in Recommendation 1 above to include an explanation that financial disclosure reports must be filed within 30 days of appointment as an employee of AFRH, as appropriate.	Closed
3	Establish written procedures for issuing notices to prospective employees. Ensure that these procedures include the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c).	OGE examined AFRH's updated written procedures governing the agency's ethics program and found the procedures to mention the responsibilities of both the DAEO and the agency's Chief Human Capital Officer, which includes coordinating functions outsourced to BFS, as it relates to issuing notices to prospective employees.  These procedures also referenced the DAEO's responsibility to perform annual reviews of these procedures each year as required.	Closed

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4	Draft an appropriate notice for new supervisors and establish written procedures for issuing notices to new supervisors. Ensure that new supervisors receive the information required by 5 C.F.R. § 2638.306.	<p>During the second follow-up review, OGE examined two notices sent to two new supervisors as required by 5 C.F.R. § 2638.306. Both notices were issued in August 2023 and included the required content information.</p> <p>As mentioned in Recommendation 3 above, OGE examined AFRH's updated written procedures governing the agency's ethics program and found the procedures to mention the responsibilities of both the DAEO and the agency's Chief Human Capital Officer regarding issuing notices to new supervisors. These procedures also referenced the DAEO's responsibility to perform annual reviews of these procedures each year as required.</p>	Closed
5	Ensure a means of verifying that initial ethics training is received even when the function is outsourced, as required by 5 C.F.R. § 2638.304.	According to AFRH's updated written procedures governing the agency's ethics program referenced in Recommendation 3, the DAEO is responsible for verifying that initial ethics training is received and meets with the AFRH Chief Human Capital Officer on a bi-weekly basis to verify completion of initial ethics training. The DAEO will retain a copy of the completed new employee orientation form and/or automated spreadsheet which verifies completion of the new employee's initial ethics training.	Closed

Based on the results of OGE's second follow-up review, OGE has closed all five recommendations.