

ETHICS PROGRAM INSPECTION REPORT

Agency: United States Chemical Safety and Hazard Investigation Board

Report No.: 23-351

Date: July 26, 2023

Period Covered by Review: October 29, 2021 through January 31, 2023

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

1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	32
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	1
1.3	Number of non-PAS public financial disclosure reports required to be filed.	5
1.4	Number of confidential financial disclosure reports required to be filed.	14
	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).	Acting General Counsel
1.8	Grade level of ADAEO.	14
1.9	Title of the primary, day-to-day ethics program administrator.	Acting General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	14
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.	1
	COMMENTS	
	1.2: CSB is managed by five board members who are all PAS officials; however, two board positions were vacant at the time OGE conducted its review and only one PAS report was required to be filed during the period covered by OGE's review. 1.12: The ethics official began assisting the ADAEO in September of 2022.	

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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			
	2.1: The DAEO position was vacant during the period covered by OGE's review. The former DAEO terminated on November 21, 2020. CSB explained that the agency expects to fill this position in 2024 or by 2025. OGE stresses the importance of appointing a DAEO to provide leadership and continuity for the ethics program.			

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"/>

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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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 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).	0%		
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).	50%		
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).	50%		
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%		
	COMMENTS			
	<p>3.0: The former DAEO terminated in 2020, but never filed a termination report. This report falls outside of the scope for OGE’s review and is therefore not included on line 3.11. However, CSB must still collect this report. If the former DAEO refuses to file a termination report, CSB should refer the matter to the Department of Justice. CSB must also either assess or waive the late filing fee for this filer.</p> <p>3.6: CSB explained that due to conflicting administrative reports in <i>Integrity</i>, they are uncertain whether some reports currently require purging. CSB reached out to NARA for assistance and ensured OGE’s review team that the agency will purge any reports NARA determines are beyond the retention period.</p> <p>3.9: There was only one new entrant non-PAS public financial disclosure report required to be filed in 2022. The report was due from an employee who had left a public filing position in one agency to accept a public filing position within CSB. However, the employee did not submit a new entrant report or provide a copy of the public report filed with their previous agency. The employee did file a combination annual/termination report upon leaving CSB in May 2022. CSB should have required the employee to file either a new entrant report or a copy of the last report they submitted to their prior agency.</p> <p>3.12, 3.13 OGE reviewed the four non-PAS reports that were filed in 2022. Two of four reports were neither reviewed nor certified timely.</p>			

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

COMPLIANCE REQUIREMENTS		Yes	No	N/A
The agency has written policies and procedures in place governing: <i>See 5 U.S.C app. IV, § 402(d)(1).</i>				
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"/>

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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"/>
	DATA ANALYSIS	%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	0%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	54%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	50%		
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).	50%		
	COMMENTS			
	4.7: The one new entrant report required to be submitted during the period covered by OGEs review was submitted more than 200 days after the employee’s appointment. 4.8: Six of the 13 annual reports required to be filed during the period covered by OGE’s review were filed late. 4.9, 4.10: Seven of the 14 reports were not reviewed or certified timely.			

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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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				
5.0: CSB relies on the Department of Interior's Interior Business Center (IBC) to provide the required notices to prospective employees and new supervisors. However, this was not reflected in CSB's written procedures. An agency's written procedures should accurately capture the processes and procedures the agency uses to administer its ethics program. This provides consistency and continuity. 5.5, 5.8: OGE reviewed a sample of seven notices sent to prospective employees. The notices sent to two prospective employees who were being appointed to positions whose incumbents are required to submit financial disclosure reports did not include the language advising them				

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of the relevant requirements. In one instance, one new employee did not learn that they were required to file a confidential financial disclosure report until six months after their appointment.

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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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>6.0: CSB relies on IBC to provide the required notices to prospective employees and new supervisors. However, this was not reflected in CSB's written procedures. An agency's written procedures should accurately capture the processes and procedures the agency uses to administer its ethics program. This provides consistency and continuity.</p> <p>6.3, 6.7: CSB's notices to new supervisors combine the language required to be provided to prospective employees and new supervisors. OGE examined two notices sent to new supervisors and found that the notice did not provide the text of the Principles of Ethical Conduct. CSB acknowledges that the Managing Director, HR Director, and Board Chairman did not receive a notice.</p> <p>6.4: The DAEO/ADAEAO did not deem any additional information necessary.</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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	83%		
	COMMENTS			

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7.0: CSB provides live training. CSB confirms the training slides provided for OGE's review serve as a script for the presenter and that employees do not receive a copy. Instead, employees take turns reading aloud parts of the slides during the training. Employees also receive an email that provides access to the Standards of Conduct and the General Principles. The email also recommends employees download the "Ethics app" developed by the U.S. Department of Agriculture, which is designed to provide employees access to ethics-related information.

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. *See* 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. § 2638.307(e)(2) and 5 C.F.R. § 2638.308(e)(2).	<input type="checkbox"/>	<input checked="" 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"/>
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"/>

DATA ANALYSIS**Training Format****Live****Interactive**

Percentage of public filers who completed annual ethics training before the end of the calendar year. *See* 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).	100%	N/A
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	50%	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).	83%	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).	100%	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: CSB provides live annual ethics training.
 8.2: CSB only provides the Standards of Conduct as part of initial ethics training and does not include it as part of annual ethics training.
 8.6: CSB has no Schedule I or II Executives.
 8.8: Only two non-PAS filers required annual ethics training during the period covered by OGE's review. One was unable to attend due to scheduling conflicts.

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	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.			

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	2.1	<u>RECOMMENDATION:</u> CSB must appoint a new DAEO. In addition, anyone performing the duties of the DAEO for more than 60 days must file a public financial disclosure report. <u>AGENCY RESPONSE:</u>	
2	3.0	<u>RECOMMENDATION:</u> Collect the former DAEO's termination report. If the former DAEO refuses to file the report, refer this matter to the Department of Justice. In addition, CSB must decide to either assess or waive a late filing fee. <u>AGENCY RESPONSE:</u>	
3	3.9	<u>RECOMMENDATION:</u> Ensure the timely collection of new entrant non-PAS public financial disclosure reports. <u>AGENCY RESPONSE:</u>	
4	3.12, 3.13	<u>RECOMMENDATION:</u> Ensure the timely review/certification of all non-PAS public financial disclosure reports. <u>AGENCY RESPONSE:</u>	
5	4.7, 4.8	<u>RECOMMENDATION:</u> Ensure the timely collection of both new entrant and annual confidential financial disclosure reports. <u>AGENCY RESPONSE:</u>	
6	4.9, 4.10	<u>RECOMMENDATION:</u> Ensure the timely review/certification of all confidential financial disclosure reports. <u>AGENCY RESPONSE:</u>	

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7	5.0, 6.0	<p><u>RECOMMENDATION:</u> Ensure that written procedures include a description of the role the Interior Business Center or any other provider plays in meeting ethics program requirements.</p> <p><u>AGENCY RESPONSE:</u></p>	
8	5.5, 5.8	<p><u>RECOMMENDATION:</u> Ensure that notices to prospective employees include the required financial disclosure information for employees entering into positions whose incumbents are required to file financial disclosure reports.</p> <p><u>AGENCY RESPONSE:</u></p>	
9	6.3, 6.7	<p><u>RECOMMENDATION:</u> Ensure that all new supervisors receive the required notice of their enhanced ethics-related responsibilities. In addition, ensure that these notices include access to (e.g. a link or instructions for accessing) the Principles of Ethical Conduct.</p> <p><u>AGENCY RESPONSE:</u></p>	
10	8.8	<p><u>RECOMMENDATION:</u> Ensure that all non-PAS public financial disclosure filers receive annual ethics training.</p> <p><u>AGENCY RESPONSE:</u></p>	