

ETHICS PROGRAM INSPECTION REPORT

Agency: Corporation for National and Community Service (CNCS)

Report No.: 22-251

Date: April 8, 2022

Period Covered by Review: January 1, 2021 through December 31, 2021

**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.	570
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See Comment Below
1.3	Number of non-PAS public financial disclosure reports required to be filed.	44
1.4	Number of confidential financial disclosure reports required to be filed.	298
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.6	Grade level of DAEO.	NX-2
1.7	Title of Alternate DAEO (ADAEO).	Associate General Counsel
1.8	Grade level of ADAEO.	NY-4
1.9	Title of the primary, day-to-day ethics program administrator.	Associate General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	NY-4
1.11	Current number of full-time ethics officials.	1
1.12	Current number of part-time ethics officials.	5
1.13	Number of reporting levels between the DAEO and the agency head.	1

COMMENTS

(1.1) Operating as AmeriCorps since September 2020, CNCS is the only federal agency tasked with elevating service and volunteerism in America. The agency provides opportunities for people of all ages and backgrounds to give their time and talent to strengthen communities across the country. CNCS full-time employees are located at its headquarters office in Washington, DC and in eight AmeriCorps regional offices and four existing CNCS campuses across the country

(1.2) The Chief Executive Officer and the Inspector General are the agency's only full-time PAS positions. In addition to these two positions, CNCS' Board of Directors is comprised of 15 members who are also appointed by the President with the advice and consent of the Senate. Board members serve as SGEs. The Board members set policy and direction for the agency and are responsible for all actions taken by the Chief Executive Officer with respect to standards, policies, procedures, programs, and initiatives necessary to carry out the agency's mission. (See, SPECIAL GOVERNMENT EMPLOYEES section at 10.0 below)

(1.6 and 1.8) The Corporation has five pay band levels, each consolidating two or more "traditional" General Schedule grades."

(1.11) The ADAEO is the agency's only full-time ethics official.

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. See 5 C.F.R. § 2638.107(a).	<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. See 5 C.F.R. § 2638.107(a).	<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 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 type="checkbox"/>	<input checked="" 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).	100%			
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).	88%			
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).	95%			
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).	95%			
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>(3.4) One departing employee required to file a termination public financial disclosure report during the period covered by OGE's inspection filed their report after the applicable due date. Ethics officials waived the late filing fee due to extraordinary circumstances that prevented the filer from filing the termination report timely. The filer eventually filed the report. Therefore, OGE is not making a formal recommendation for improvement.</p> <p>(3.7) CNCS self-reported on its annual questionnaire for 2021 that they have recently encountered situations where ethics officials were not notified of the appointments of new employees, contrary to agency policy. Ethics officials indicated that they had been working with the agency's Office of Human Capital (OHC) to identify why this problem has been occurring and how to address it. Possible causes include turnover in OHC and disruptions resulting from now-abandoned plans to outsource relevant functions to a shared services provider. Ethics officials indicated that they have been able to identify most of the new employees that they did not receive notice of earlier through the agency's initial ethics training program. OGE recommends that CNCS' OHC promptly notify the DAEO of all appointments to positions whose incumbents are required to file public financial disclosure reports no later than 15 days after the appointment occurs.</p>					

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(3.11) OGE examined eight termination reports that were required to be filed in 2021. Of the eight termination reports, seven were filed timely (88%), and one (13%) was filed late. (see, 3.4 above) Additionally, one departing employee who was required to file a termination report failed to do so. CNCS referred that employee to the Department of Justice (Justice).

CNCS did not concurrently notify OGE of the referral, as required. Prior to the conclusion of this inspection, CNCS formally notified OGE of the referral using the required OGE Form 202. CNCS ethics officials were reminded of the relevant requirement to concurrently notify OGE on any alleged ethics violations referred to Justice therefore, no recommendation is being issued.

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE**COMPLIANCE REQUIREMENTS****Yes****No****N/A**The agency has written policies and procedures in place governing: *See* 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 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 type="checkbox"/>	<input checked="" 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).	100%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	98%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	95%
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).	95%

COMMENTS

(4.5) CNCS does not have an OGE-approved alternative confidential financial disclosure system.

(4.6) As noted at 3.7 above, CNCS self-reported on its annual questionnaire for 2021 that they have recently encountered situations where ethics officials were not notified of the appointments of new employees, contrary to agency policy. OGE is making a recommendation in this area.

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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	• 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS							
None							

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	• Contact information for the agency's ethics office.				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.				<input type="checkbox"/>	<input checked="" 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 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 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</i> 5 C.F.R. § 2638.306(d).				<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</i> 5 C.F.R. § 2638.306(b).				<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS							
(6.1 – 6.4 and 6.7) For the period covered by OGE's inspection, ethics officials indicated that they could not obtain sufficient information from the agency's OHC to indicate whether notices to new supervisors had been provided as required by 5 C.F.R. § 2638.306. OGE was assured however, that these notices are being provided to new supervisors in 2022. Since OGE was not able to fully evaluate this area of CNCS' ethics program, OGE is making a recommendation in this area.							

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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>	97%		
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>	84%		
	COMMENTS			
	(7.3) While OGE found CNCS's Ethics Office Notification Procedure policy to reference initial ethics training, most of the information was found in the Appendix of the policy. OGE suggests CNCS update the policy to highlight initial ethics training as its own separate and distinct section.			

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 5 C.F.R. §§ 2638.307 and 2638.308.</i>			
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	<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 5 C.F.R. § 2638.304(e)(2).</i>	<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 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>	<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 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>	<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 5 C.F.R. § 2638.308(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	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).	100%	100%
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	100%	100%
	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).	100%	100%
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%	100%
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	100%	100%
COMMENTS			
<p>(8.2) According to the ADAEO, annual ethics training for 2021 was broken up into three sessions (the Ethics Office presented a general session for non-filers; a session aimed at confidential financial disclosure report filers and supervisors; and a session aimed at public financial disclosure report filers). Rather than sharing written materials since the agency has been conducting all-virtual sessions for the last two years, the ADAEO informed each class that they could copy or the Ethics Office shared the presentation with attendees afterwards. This would allow employees to access the various standards of conduct provisions cited in the presentation and use the presentation as a reference.</p> <p>Upon review of the training slides used to conduct annual training, OGE found that CNCS did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them. Prior to the conclusion of this inspection, the ADAEO confirmed a direct link to the Standards of Conduct is now provided to covered employees beginning with annual training that commenced in March of 2022. As a result, OGE is not making a formal recommendation in this area.</p> <p>(8.6) CNCS does not have any Executive Schedule Level I or Level II employees.</p> <p>(8.10 and 8.11) CNCS did not have any employees in these categories.</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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
	None			

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10.1	Number of SGEs	See Comment Below
	DATA ANALYSIS	%
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See 5 C.F.R. § 2634.903(b).</i>	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 5 C.F.R. § 2634.605(a).</i>	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>	N/A

Ethics Training

	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Required ethics training must be provided to each SGE. <i>See 5 C.F.R. §§ 2638.304 and 2638.307.</i>			
10.5	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 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 5 C.F.R. § 2638.304(e)(2).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See 5 C.F.R. § 2638.304(b)(2).</i>	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See 5 C.F.R. § 2638.307(d)(2).</i>	N/A		

COMMENTS

(10.1) As previously noted, CNCS' Board of Directors is comprised of 15 members who are appointed by the President with the advice and consent of the Senate and serve as SGEs. They set policy and direction for the agency and are responsible for all actions taken by the agency's Chief Executive Officer with respect to standards, policies, procedures, programs, and initiatives necessary to carry out the agency's mission. All Board member positions were vacant at the time of OGE's examination. However, a number of individuals were being considered for nomination.

(10.2 – 10.9) As previously noted, there were no board members during the period covered by OGE's examination.

ISSUE IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
3.4	<p><u>ISSUE:</u> CNCS did not concurrently notify OGE of a referral made to the Department of Justice on a public financial disclosure filer who failed to file a termination public report.</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, CNCS formally notified OGE of the referral using the required OGE Form 202</p>

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8.2

ISSUE: CNCS did not provide covered employees with an appropriate summary of the standards of conduct or written instruction for accessing them during annual ethics training in 2021.

AGENCY RESPONSE: The DAEO and ADAEO have begun providing a direct link to the Standards of Conduct beginning with annual ethics training that commenced in March of 2022.

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	3.7	<p><u>RECOMMENDATION:</u> CNCS' human resources office (OHC) must ensure that the DAEO is promptly notified of all appointments to positions whose incumbents are required to file public financial disclosure reports no later than 15 days after the appointment.</p> <p><u>AGENCY RESPONSE:</u> The agency's ethics officials have requested that OHC provide quarterly reports of all appointments and promotions for the previous quarter to ensure that all new employees required to file financial disclosure reports are accounted for and assigned reports on a timely basis.</p>	June 2022
2	4.6	<p><u>RECOMMENDATION:</u> CNCS' human resources office must ensure that the DAEO is promptly notified of all appointments to positions whose incumbents are required to file confidential financial disclosure reports no later than 15 days after the date of appointment.</p> <p><u>AGENCY RESPONSE:</u> The agency's ethics officials have requested that OHC provide quarterly reports of all appointments and promotions for the previous quarter to ensure that all new employees required to file financial disclosure reports are accounted for and assigned reports on a timely basis.</p>	June 2022
3	6.1 - 6.4 and 6.7	<p><u>RECOMMENDATION:</u> CNCS' human resources office must ensure that new supervisors receive the notice required by 5 C.F.R. § 2638.306 and that the DAEO is promptly notified of these notices when they are sent out.</p> <p><u>AGENCY RESPONSE:</u> The agency's ethics officials have requested that OHC provide quarterly reports of all supervisor appointments and promotions for the previous quarter to ensure that all new supervisors are provided with the notice required under 5 CFR 2638.306.</p>	June 2022