

ETHICS PROGRAM INSPECTION REPORT

Agency: National Transportation Safety Board (NTSB)

Report No.: 22-271

Date: April 26, 2022

Period Covered by Review: January 1, 2021 through February 14, 2022

**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.	401
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	5
1.3	Number of non-PAS public financial disclosure reports required to be filed.	43
1.4	Number of confidential financial disclosure reports required to be filed.	213
	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).	Attorney Advisor
1.8	Grade level of ADAEO.	GS-14
1.9	Title of the primary, day-to-day ethics program administrator.	Paralegal Specialist
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-13
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	4
1.13	Number of reporting levels between the DAEO and the agency head.	1
	COMMENTS	
	None.	

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 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. § 2638.107(a).	<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 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"/>

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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 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).	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).	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).	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).	100%		
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			
	None.			

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 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).	62%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%		

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4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%
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).	100%
COMMENTS		
<p>4.1, 4.2, 4.4: OGE examined NTSB's written procedures for administering the confidential financial disclosure system. OGE's examination raised concerns in several areas. NTSB acted quickly to make the appropriate changes to their written procedures regarding timely collection of new entrant reports, and the review and retention of reports. Revisions were also made to reflect that the OGE Form 450A was no longer authorized for use.</p> <p>4.5: NTSB does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>4.7: OGE examined a sample of 13 new entrant confidential financial disclosure reports filed in 2021. OGE found that 5 (38%) of the reports had been filed by employees who had entered covered positions prior to 2020 but were not identified as filers until 2021. This is when NTSB's current ethics officials learned that some employees who entered covered positions in previous years had not been identified and began a review of positions. Ethics officials identified five employees as filers not previously identified. These employees were required to file new entrant reports in 2021. OGE believes NTSB took appropriate action to ensure each employee who was required to file a confidential financial disclosure report did file a report.</p>		

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 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 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>5.6, 5.8: NTSB's response to OGE's 2021 Agency Ethics Program Questionnaire stated that the agency had written procedures for issuing the required notices to prospective employees. However, NTSB could not provide the written procedures at the time OGE began its inspection. NTSB developed draft written procedures for issuing the notice to prospective employees during the course of the inspection.</p> <p>5.7: The DAEO did not review the written procedures annually.</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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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6.2	<ul style="list-style-type: none"> The text of 5 C.F.R. § 2638.103. 	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"> Other information the DAEO deems necessary. 	<input checked="" type="checkbox"/>	<input 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 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"/>
COMMENTS				
6.5, 6.7: NTSB's response to OGE's 2021 Agency Ethics Program Questionnaire stated that the agency had written procedures for issuing the required notices to new supervisors. However, NTSB could not provide the written procedures at the time OGE began its inspection. NTSB developed draft written procedures for issuing the notice to new supervisors during the course of the inspection. 6.6: The DAEO did not review the written procedures annually.				

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 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</i> 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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</i> 5 C.F.R. § 2638.304(f).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
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			
	7.2: PAS officials receive live initial ethics training and did receive a summary of the Standards of Conduct. Other new employees receive initial ethics training through FedTalent, an online system. These employees received instructions for contacting the agency’s ethics officials and written materials that the DAEO determined should be included, but they did not receive either a copy of or written instructions for accessing a summary of the Standards of Conduct. 7.3: NTSB’s response to OGE’s 2021 Agency Ethics Program Questionnaire stated that the agency had written procedures for initial ethics training. However, NTSB could not provide the written procedures at the time OGE began its inspection. NTSB developed draft written procedures for initial ethics training during the course of the inspection. 7.4: The DAEO did not review the written procedures annually.			

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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. § 2638.304(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"/>
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. <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%	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).			99%	1%	
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).			99%	1%	
COMMENTS						
None.						

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						

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None.

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.	N/A
	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 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</i> 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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).	N/A		
	COMMENTS			
	10.1 – 10.9: NTSB did not have any SGEs during the period covered by the inspection.			

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
4.1, 4.2, 4.4	<p>ISSUE: NTSB's written procedures for administering the confidential financial disclosure system were not in full compliance with applicable requirements when OGE began its inspection. NTSB revised their procedures in the following four areas and they are now in full compliance with applicable requirements:</p> <ul style="list-style-type: none"> Added the requirement that the collection of new entrant reports occur within 30 days Removed the references to the OGE Form 450A, which is no longer authorized for use Added the specification that ethics officials are responsible for the review of confidential reports Added the specification that the retention of confidential reports must adhere to NARA's General Records Schedule 2.8.

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	<p><u>AGENCY RESPONSE:</u> The NTSB concurs with the issue and has fully resolved it. During the inspection, ethics officials updated the written procedures for administering the confidential financial disclosure system to ensure they were in full compliance with applicable requirements. The DAEO reviewed and approved the new procedures.</p>
5.6, 5.8	<p><u>ISSUE:</u> NTSB did not have written procedures for issuing notices to prospective employees when OGE began its inspection. The agency drafted procedures during the course of the review. NTSB's procedures are in compliance with applicable requirements.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the issue and has fully resolved it. NTSB ethics officials have been working closely with our human resources officials to improve our communication relating to our collective ethics responsibilities. NTSB ethics officials formalized our existing procedures into written procedures in coordination with the human resources officials.</p>
6.5, 6.7	<p><u>ISSUE:</u> NTSB did not have written procedures for issuing notices to new supervisors when OGE began its inspection. The agency drafted procedures during the course of the review. NTSB's procedures are in compliance with applicable requirements.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the issue and has fully resolved it. NTSB ethics officials have been working closely with our human resources officials to improve our communication relating to our collective ethics responsibilities. NTSB ethics officials formalized our existing procedures into written procedures in coordination with the human resources officials.</p>
7.3	<p><u>ISSUE:</u> NTSB did not have written procedures for initial ethics training when OGE began its inspection. The agency drafted procedures during the course of the review. NTSB's procedures are in compliance with applicable requirements.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the issue and has fully resolved it. NTSB ethics officials have been working closely with our human resources officials to improve our communication relating to our collective ethics responsibilities. NTSB ethics officials formalized our existing procedures into written procedures in coordination with the human resources officials.</p>

RECOMMENDATIONS			
#	Element	RECOMMENDATION	Compliance Due
1	5.7	<p><u>RECOMMENDATION:</u> Ensure that the DAEO reviews the written procedures for issuing notices to prospective employees.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the recommendation and has implemented a solution. The NTSB annually assesses its procedures to ensure that prospective employees receive the required notices. During the inspection, NTSB ethics officials coordinated with the human resources officials to ensure that prospective employees were receiving the required notices. Further, the NTSB has developed written procedures that fully comply with the applicable regulations, and the DAEO will review the written procedures in December to ensure that they remain compliant with the applicable regulations.</p>	
2	6.6	<p><u>RECOMMENDATION:</u> Ensure that the DAEO reviews the written procedures for issuing notices to new supervisors.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the recommendation and has implemented a solution. The NTSB annually assesses its procedures to ensure that new supervisors receive the required notices. During the inspection, NTSB ethics officials coordinated with the human resources officials to ensure that prospective employees were receiving the required notices. In addition, NTSB ethics officials share the notice with all current supervisors shortly after assigning confidential financial disclosure annual reports. Further, the NTSB has developed written procedures that fully comply with the applicable regulations.</p>	

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in the Executive Branch

		<u>and the DAEO will review the written procedures in December to ensure that they remain compliant with the applicable regulations.</u>	
3	7.2	<p><u>RECOMMENDATION:</u> Ensure that all new employees receiving initial ethics training receive a copy of or written instructions for accessing all required written materials.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the recommendation and has implemented a solution. During the inspection, NTSB ethics officials determined that they had provided some, but not all, of the required written materials to employees receiving initial ethics training. NTSB ethics officials immediately updated the materials to include written instructions for accessing a summary of the Standards of Conduct. We will continue to provide these instructions to every employee who joins our agency.</p>	
4	7.4	<p><u>RECOMMENDATION:</u> Ensure that the DAEO reviews the written procedures for providing initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> The NTSB concurs with the recommendation and has implemented a solution. Throughout the year, NTSB ethics officials assess the initial ethics training program to ensure that all agency employees complete initial ethics training. Further, the NTSB has developed written procedures that fully comply with the applicable regulations, and the DAEO will review the written procedures in December to ensure that they remain compliant with the applicable regulations.</p>	