

ETHICS PROGRAM INSPECTION REPORT

Agency: The Barry Goldwater Scholarship and Excellence in Education Foundation (Foundation)

Report No.: 22-261

Date: April 14, 2022

Period Covered by Review: January 1, 2021 through March 15, 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. | 2 |
| 1.2 | Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed. | 0 |
| 1.3 | Number of non-PAS public financial disclosure reports required to be filed. | 1 |
| 1.4 | Number of confidential financial disclosure reports required to be filed. | 0 |
| | ETHICS PROGRAM | |
| 1.5 | Title of Designated Agency Ethics Official (DAEO). | President/Executive Secretary |
| 1.6 | Grade level of DAEO. | Non-Career SES |
| 1.7 | Title of Alternate DAEO (ADAEO). | Executive Administrator |
| 1.8 | Grade level of ADAEO. | GS-13 |
| 1.9 | Title of the primary, day-to-day ethics program administrator. | Executive Administrator |
| 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. | 2 |
| 1.13 | Number of reporting levels between the DAEO and the agency head. | 1 |
| | COMMENTS | |
| | <p>(1.2) The Barry Goldwater Scholarship and Excellence in Education Foundation (Foundation) does not have any PAS officials.</p> <p>The Foundation’s organizational structure includes a Board of Trustees (Board) which provides supervision and direction. When all positions are occupied, the Board is comprised of 13 members. Eight members are appointed by the President with the advice and consent of the Senate; two members from the Senate; two members from the House of Representatives; and the Secretary of Education or designee, who serves as an ex officio member, but is not eligible to serve as Chairman. In 1995, the Office of General Counsel for the Department of Education issued an ethics opinion in which it determined that the eight members of the Board who are appointed by the President with the advice and consent of the Senate are Special Government Employees (SGE). However, the opinion stated that the members are excluded from the financial disclosure reporting requirement because the duties of their positions made remote the possibility that they would be involved in any real or apparent conflict of interest. Currently, the Board of Trustees consists of seven members and the President/Executive Secretary. The seven members file new entrant confidential reports with the Executive Office of the President when they first assume their positions.</p> <p>(1.3) The President/Executive Secretary/Designated Agency Ethics Official (DAEO) is the Foundation’s only public financial disclosure report filer.</p> | |

| 2.0 | LEADERSHIP | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| | 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. § 2638.107(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 | | | |

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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 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"/> | | |
| 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). | 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). | 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>(3.4) The one public financial disclosure report required to be filed at the Foundation was not subject to the late filing fee or a waiver of the fee during the period covered by the inspection.</p> <p>(3.5-3.6) The Foundation uses Integrity (OGE's electronic public financial disclosure system) to process and maintain public financial disclosure reports.</p> <p>(3.7-3.8) During the period covered by the inspection, the Foundation had no employees who were required to file a new entrant public financial disclosure report nor departing employees who were required to file a termination report.</p> <p>(3.14-3.17) The Foundation does not have any PAS officials who are required to file a public financial disclosure report.</p> | | | | | | |

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| 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"/> | | |
| 4.3 | Confidential financial disclosure reports are securely maintained. <i>See OGE/GOVT-2.</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |
| 4.4 | Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See 5 C.F.R. § 2634.604.</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |
| 4.5 | The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See 5 C.F.R. § 2634.905(a).</i> | <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 5 C.F.R. § 2638.105(a)(1).</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |
| DATA ANALYSIS | | | | % | | |
| 4.7 | Percentage of sampled confidential new entrant reports filed timely. <i>See 5 C.F.R. § 2634.903(b).</i> | N/A | | | | |
| 4.8 | Percentage of sampled confidential annual reports filed timely. <i>See 5 C.F.R. § 2634.903(a).</i> | N/A | | | | |
| 4.9 | Percentage of sampled reports reviewed within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i> | N/A | | | | |
| 4.10 | Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).</i> | N/A | | | | |
| COMMENTS | | | | | | |
| (4.1-4.10) The Foundation had no positions whose incumbents are required to submit confidential financial disclosure reports during the period covered by the Office of Government Ethics (OGE) inspection. | | | | | | |

| 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 5 C.F.R. § 2638.303.</i> | | | | | | |
| 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 5 C.F.R. § 2638.303(c).</i> | <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 5 C.F.R. § 2638.303(c).</i> | <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 5 C.F.R. § 2638.303.</i> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |

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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: *See* 5 C.F.R. § 2638.306.

| | | | | |
|-----|---|--------------------------|--------------------------|-------------------------------------|
| 6.1 | • Contact information for the agency's ethics office. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6.2 | • The text of 5 C.F.R. § 2638.103. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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</i> 5 C.F.R. § 2638.306(d). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

COMMENTS

(6.1 - 6.7) The Foundation's only supervisory position is that of the President/Executive Secretary, who also serves as the DAEO. Therefore, OGE does not find it necessary to issue a recommendation concerning the lack of a notice to new supervisors.

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

COMMENTS

(7.1-7.4) During the period covered by the inspection, the Foundation had no new employees other than Board members who serve as SGEs and are discussed below. Therefore, initial ethics training was neither required nor given.

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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). | | | | N/A | N/A | |
| 8.8 | • SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). | | | | N/A | 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). | | | | 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 | |
| 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 | 100% | |
| COMMENTS | | | | | | | |
| <p>(8-1-8-4) As the manager of the agency's ethics program and its only public filer required to receive annual ethics training, the DAEO is the agency expert on ethics related issues. In preparation for the March 2022 Foundation meeting, agency ethics officials reviewed The National Institutes of Health's Ethics training for Special Government Employees as well as reviewing OGE videos on Special Government Employees and reviewing Ethics Pledges.</p> <p>(8.6, 8.7) The Foundation does not have any Executive Schedule Level I and Level II employees nor any other PAS and equivalent employees required to file a public financial disclosure report.</p> <p>(8.8) The Foundation's DAEO, who is the agency's only public filer, is an SES employee.</p> | | | | | | | |

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| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| | COMMENTS | | | |
| | (9.1) Foundation ethics officials stated that no ethics advice or counseling was provided during the period covered by the inspection. | | | |

| 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. | 9 | | |
| | 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 checked="" type="checkbox"/> | <input 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"/> |
| | DATA ANALYSIS | % | | |
| 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). | 0% | | |
| | COMMENTS | | | |
| | (10.2-10.4) The nine members of the Foundation's Board of Trustees are excluded from financial disclosure reporting requirements. (10.7-10.8) Two board members were appointed on December 20 th , 2021. The Foundation's ethics officials provided their initial ethics training during the March 2022 board meeting. (10.9) The Foundation did not conduct annual ethics training for SGE employees in 2021. Annual ethics training was provided at the annual board meeting on March 9 th , 2022. The Foundation's ethics officials now use the SGE training videos from the National Institute of Health to ensure ethics training is completed annually. | | | |

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ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

| Element | ISSUE |
|---------|---|
| 10.9 | <p><u>ISSUE:</u> The Foundation did not conduct annual ethics training in 2021.</p> <p><u>AGENCY RESPONSE:</u> The Foundation acknowledged that it did not conduct annual ethics training in 2021. Foundation ethics officials ensured completion of annual training in 2022 and developed protocols to ensure future compliance.</p> |

GENERAL AGENCY COMMENTS