

ETHICS PROGRAM INSPECTION REPORT

Agency: U.S. Election Assistance Commission (EAC)

Report No.: 23-511

Date: September 7, 2023

Period Covered by Review: January 1, 2022 through July 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.	63
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	4
1.3	Number of non-PAS public financial disclosure reports required to be filed.	13
1.4	Number of confidential financial disclosure reports required to be filed.	7
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Senior Associate Counsel
1.6	Grade level of DAEO.	GS- 13
1.7	Title of Alternate DAEO (ADAEO).	Associate Counsel
1.8	Grade level of ADAEO.	GS- 13
1.9	Title of the primary, day-to-day ethics program administrator.	Senior Associate Counsel
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	
	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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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).	38%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	83%		
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).	47%		
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).	47%		
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).	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).	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			
	(3.6) Ethics officials indicated that EAC is currently updating its records schedules and building a records management office. Reports are maintained, but the EAC does not currently have a process for the destruction of records. (3.9) Only three of the eight new entrant public reports OGE examined were filed timely. Ethics officials explained that some filers were not immediately identified, and filed when only when eventually requested by the DAEO. (3.12-3.13) Only seven of the 15 reports public reports OGE examined were reviewed and certified timely. Ethics officials explained that the delay in certification was a result of a transition in the ethics roles; the former DAEO did not certify prior to departure. (3.15) There were no PAS termination reports required to be filed during the period covered by OGE’s inspection.			

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 type="checkbox"/>	<input checked="" 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"/>

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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. See 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. See 5 C.F.R. § 2634.903(b).	0%		
4.8	Percentage of sampled confidential annual reports filed timely. See 5 C.F.R. § 2634.903(a).	88%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).	100%		
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	0		
	COMMENTS			
	(4.1) OGE's examination of EAC's written procedures for its administration of the confidential financial disclosure system revealed that they did not clearly state the date of filing for annual reports, and erroneously stated that failing to file confidential reports could result in a \$200 late fee. Consequently, EAC's ethics officials corrected the written procedures after OGE brought these issues to their attention. (4.4) Ethics officials explained that EAC is currently updating its records schedules and building a records management office. Reports are maintained, but the EAC does not currently have a process for the destruction of records. (4.5) EAC does not have an OGE-approved alternative confidential financial disclosure system. (4.7) There was only one new entrant confidential report in the sample examined by OGE. The new entrant report was filed late. (4.10) None of the reports examined by OGE contained a signature on the final reviewers certification field. According to ethics officials, the former DAEO noted that these reports were certified, though the copies examined by OGE did not contain her final signature. Ethics officials have been unable to locate the signed copies.			

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 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.				

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

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 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.	Could Not Determine		
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).	Could Not Determine		
	COMMENTS			
	(7.5-7.6) According to ethics officials, all new employees received initial ethics training (IET). However, they were unable to provide IET completion records. Thus, OGE was unable to assess the IET completion rate or timeliness.			

8.0 ANNUAL ETHICS TRAINING

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	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 type="checkbox"/>	<input checked="" 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 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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	<ul style="list-style-type: none">Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A	
8.7	<ul style="list-style-type: none">Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	0%	0%	
8.8	<ul style="list-style-type: none">SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	0%	0%	
	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	<ul style="list-style-type: none">Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	0%	0%	
8.10	<ul style="list-style-type: none">Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	0%	0%	
8.11	<ul style="list-style-type: none">Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	0%	0%	
8.12	<ul style="list-style-type: none">Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	0%	0%	
8.13	<ul style="list-style-type: none">Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	0%	0%	
	COMMENTS			
	(8.1-8.13) EAC did not provide annual ethics training in 2022.			

9.0 ETHICS ADVICE AND COUNSELING

COMPLIANCE REQUIREMENT	Yes	No	N/A
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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.				

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.	3
DATA ANALYSIS		%
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	0%
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).	0%
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	0%

Ethics Training

	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Required ethics training must be provided to each SGE. See 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. See 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input checked="" 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. See 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. See 5 C.F.R. § 2638.304.	0%		
10.8	Percentage of SGEs who received initial ethics training timely. See 5 C.F.R. § 2638.304(b)(2).	0%		
10.9	Percentage of SGEs who received annual ethics training. See 5 C.F.R. § 2638.307(d)(2).	0%		
	COMMENTS			
	(10.2-10.4) The SGEs did not file the required financial disclosure reports in 2022 and 2023. (10.5-10.9) EAC did not provide ethics training to SGE in 2022.			

ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
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4.1

ISSUE: OGE's examination of EAC's written procedures for its administration of the confidential financial disclosure system revealed that they did not clearly state the date of filing for annual reports, and erroneously stated that failing to file confidential reports could result in a \$200 late fee.

AGENCY RESPONSE: EAC's ethics officials corrected the written procedures.

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	3.6	<p>RECOMMENDATION: Ensure that public financial disclosure reports are retained in accordance with the retention requirements.</p> <p>AGENCY RESPONSE: The EAC is currently onboarding a Records Management Specialist who will work in conjunction with the DAEO to update records schedules, including appropriate disposition of public financial disclosure reports.</p>	September 1, 2024
2	3.9	<p>RECOMMENDATION: Ensure that non-PAS new entrant public reports are filed timely.</p> <p>AGENCY RESPONSE: The EAC is currently onboarding a new HR Manager. The DAEO shall train the new HR Manager on notification procedures to ensure that public filers are identified during the onboarding process and new entrant reports are filed timely.</p>	September 1, 2024
3	3.12	<p>RECOMMENDATION: Ensure that non-PAS public financial disclosure reports are reviewed within 60 days of receipt.</p> <p>AGENCY RESPONSE: The DAEO will ensure the reports are timely reviewed. The DAEO and ADAEO will establish internal review timelines for annual, new-entrant, and termination reports.</p>	September 1, 2024
4	3.13	<p>RECOMMENDATION: Ensure that non-PAS public financial disclosure reports are certified within 60 days of receipt.</p> <p>AGENCY RESPONSE: The delay in certification was due to a transition of EAC ethics officials. The DAEO and ADAEO will ensure that any transitions of ethics officials in the future are appropriately planned for so that certification is not delayed.</p>	September 1, 2024
5	4.4	<p>RECOMMENDATION: Ensure that confidential financial disclosure reports are retained in accordance with the retention requirements.</p> <p>AGENCY RESPONSE: The EAC is currently onboarding a Records Management Specialist who will work in conjunction with the DAEO to update records schedules, including appropriate disposition of confidential financial disclosure reports.</p>	September 1, 2024
6	4.7	<p>RECOMMENDATION: Ensure that confidential new entrant reports are filed timely.</p>	September 1, 2024

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		<u>AGENCY RESPONSE:</u> The EAC is currently onboarding a new HR Manager. The DAEO shall train the new HR Manager on notification procedures to ensure that confidential filers are identified during the onboarding process and new entrant reports are filed timely.	
7	4.10	<u>RECOMMENDATION:</u> Ensure that confidential financial disclosure reports are certified within 60 days of receipt. <u>AGENCY RESPONSE:</u> The delay in certification was due to a transition of EAC ethics officials. The DAEO and ADAEO will ensure that any transitions of ethics officials in the future are appropriately planned for so that certification is not delayed.	September 1, 2024
8	7.2	<u>RECOMMENDATION:</u> Ensure that new employees are provided 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. <u>AGENCY RESPONSE:</u> The EAC is currently onboarding a new HR Manager. The DAEO shall train the new HR Manager on the appropriate ethics materials to be provided to new employees during the onboarding process.	September 1, 2024
9	8	<u>RECOMMENDATION:</u> Ensure that each calendar year, public filers, confidential filers, and certain other employees complete ethics training which meets specified requirements. <u>AGENCY RESPONSE:</u> The DAEO and ADAEO shall ensure that annual training is provided.	September 1, 2024
10	10.1	<u>RECOMMENDATION:</u> Ensure that SGE Commission members file financial disclosure reports timely. <u>AGENCY RESPONSE:</u> The DAEO shall coordinate with ADFO's to ensure SGE members of EAC FACA boards file reports timely.	September 1, 2024
11	10.5	<u>RECOMMENDATION:</u> Ensure that SGE Commission members receive ethics training each year. <u>AGENCY RESPONSE:</u> The DAEO shall coordinate with ADFO's to ensure SGE members of receive annual ethics training.	September 1, 2024

GENERAL AGENCY COMMENTS

None.