

Agency: U.S. Commission on Civil Rights	
Report No.: 18-551	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	28
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.	24
1.4	Number of confidential financial disclosure reports required to be filed.	3
ETHICS PROGRAM		
1.4	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.5	Grade level of DAEO.	GS15
1.6	Title of Alternate DAEO (ADAEO).	Senior Attorney Advisor
1.7	Grade level of ADAEO.	GS14
1.8	Title of the primary, day-to-day ethics program administrator.	General Counsel
1.9	Grade level of the primary, day-to-day ethics program administrator.	GS15
1.10	Current number of full-time ethics officials.	0
1.11	Current number of part-time ethics officials.	5
1.12	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. § 2638.202(c).	<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. § 2638.202(c).	<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"/>	

Agency: U.S. Commission on Civil Rights	
Report No.: 18-551	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

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 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 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).	75%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	75%		
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).	17%		
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).	17%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	NA		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	NA		
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).	NA		
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).	NA		

COMMENTS				
<p>(3.6) While the Commission on Civil Rights (USCCR) did not retain any paper reports older than the required retention period of six years, there were such reports stored electronically. The DAEO confirmed that these reports were destroyed prior to the close of OGE’s inspection.</p> <p>(3.7 - 3.8) According to USCCR’s DAEO the agency has low rates of hiring and attrition. The DAEO receives oral notifications of new hires. Additionally, new hires are identified during weekly management meetings.</p> <p>(3.9) Four new entrant reports were required to be filed during the period under review. One of these four reports was filed by a USCCR Commissioner nominee who filed a report without signing it. The failure to sign was simply an oversight, according to the DAEO. However, the DAEO never required the filer to sign the report, even after it had been certified. Allowing a filer to not sign their report is not acceptable. Prior to the publication of this report, per OGE’s direction, the DAEO provided OGE a signed copy of the report.</p> <p>(3.10) Sixteen annual reports were required to be filed during the period under review. One of these 16 reports had not been filed at the start of OGE’s inspection. The report was filed prior to issuance of this inspection report and a late filing fee was assessed. The remaining three reports which were filed late were either not sufficiently late to assess the late filing fee or the late filing fee was waived.</p> <p>(3.12 - 3.13) OGE reviewed the 24 public reports required to be filed during the period covered by the inspection. Of these, OGE found only two that had been reviewed and certified timely. The remaining reports had not been certified at the start of OGE’s inspection. The DAEO certified the reports prior to issuance of this inspection report. According to the DAEO the reports were reviewed for conflicts, despite the delay in certification. However, OGE was unable to verify whether the reviews were conducted within 60 days of report filing.</p> <p>(3.14 – 3.17) USCCR does not have any PAS employees.</p>				

Agency: U.S. Commission on Civil Rights	
Report No.: 18-551	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

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).					
4.01	• 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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).				NA
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).				67%
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					
(4.4) While USCCR did not retain any paper reports older than the required retention period, there were such reports stored electronically. The DAEO confirmed that these reports were destroyed prior to the close of OGE's inspection.					
(4.7) USCCR did not have any confidential new entrant report filers during the period covered by the inspection.					
(4.8) USCCR had three confidential annual report filers. Two of the reports were filed timely while one report was filed less than a week late.					

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"/>	

Agency: U.S. Commission on Civil Rights	
Report No.: 18-551	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

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 provides 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.				90%	
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).				90%	

Agency: U.S. Commission on Civil Rights	
Report No.: 18-55I	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

COMMENTS
(7.2) While USCCR provided new employees written material that contained instructions for contacting ethics officials and information on accessing the agency’s supplemental regulations, the material did not contain instructions for accessing a summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary.

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 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(f)(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"/>

Employee Information and Annual Ethics Training **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).	NA	NA
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	NA	NA
8.8	• 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	• 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	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	0%	0%
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	0%	0%
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	0%	0%
8.13	• 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 to 8.13) USCCR did not provide annual ethics training to covered employees during the period covered by the inspection. The DAEO stated that all covered employees are scheduled to receive annual ethics training during October 2018.

Agency: U.S. Commission on Civil Rights	
Report No.: 18-551	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

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						

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.			667	
DATA ANALYSIS				%	
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).			4%	
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).			21%	
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).			21%	

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 type="checkbox"/>	<input checked="" 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.			0		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).			0		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).			91%		
COMMENTS						
<p>(10.1) USCCR used the OGE-approved Conflict-of-Interest-Statement for its SGE financial disclosure report filers.</p> <p>(10.2) USCCR has SGEs serving on 51 regional advisory committees in 6 regions across the United States. In 2016 USCCR's then ADAEO forwarded to the regions templates for tracking financial disclosure filing and ethics training. Based on OGE's review, only one of the six regions consistently tracked the financial disclosure filing due dates in USCCR's tracking spreadsheets. Therefore, OGE was unable to determine the due dates for financial disclosure reports at five of the six regions and could not assess the reports' filing timeliness. The submission of Conflict-of-Interest-Statements should be tracked and documented in a way that allows ethics officials to maintain awareness of which Conflict-of-Interest-Statements have been filed and which ones remain outstanding.</p> <p>Additionally, two reports selected by OGE for examination were not provided while four other reports provided were reports for years prior</p>						

Agency: U.S. Commission on Civil Rights	
Report No.: 18-55I	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

<p>to the period covered by the inspection.</p> <p>(10.3 - 10.4) In 2015 USCCR's then ADAEO provided to the regions training along with instructions on reviewing and certifying the OGE-approved Conflict-of-Interest-Statement for USCCR SGEs. Report certifiers however did not sign the vast majority of the reports OGE selected for examination. OGE therefore was unable to assess certification timeliness for these reports. According to the DAEO there was confusion within the regions regarding the certification of the reports.</p> <p>(10.6) OGE was unable to determine what written materials, if any, were provided to the SGEs.</p> <p>(10.7 - 10.8) USCCR could not verify whether SGEs received initial ethics training.</p>
--

RECOMMENDATION(S)			
#	Element	RECOMMENDATION	Compliance Due
1	(3.9)	<p><u>RECOMMENDATION:</u> Ensure public reports are filed, reviewed, and certified timely.</p> <p><u>AGENCY RESPONSE:</u> All reports for CY2016 have been reviewed and certified. All required reports have been filed, except for one for CY2017. That filer has been reminded of the requirement to file and assessed the \$200 filing fee. In addition, all filed reports for CY2017 have been reviewed and certified. Going forward, additional reminders will be provided to filers and offers to have the contract provider for our online filing system (FDOnline) available to assist with the technical aspects of filing reports before the filing deadline has passed. The DAEO has also emphasized the need for timely review and certification to the ADAEO.</p>	July 2019
2	(7.2)	<p><u>RECOMMENDATION:</u> Provide all new employees written material containing instructions for accessing a summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary</p> <p><u>AGENCY RESPONSE:</u> The DAEO has updated the Commission's initial ethics training to include this information.</p>	July 2019
3	(8.1-8.13)	<p><u>RECOMMENDATION:</u> Provide annual ethics training to all covered employees.</p> <p><u>AGENCY RESPONSE:</u> Training for public filers and confidential filers has been scheduled for October 2018 (with back up dates). Other employees will receive non-interactive training this year.</p>	July 2019
4	(10.2)	<p><u>RECOMMENDATION:</u> Ensure Conflict-of-Interest-Statements filed by SGEs are filed, reviewed, and certified timely.</p> <p><u>AGENCY RESPONSE:</u> The DAEO will work with the Staff Director (who oversees the Chief of the Regional Staff) to put in place a process for this to occur. In addition, the DAEO or ADAEO will again provide training to regional staff on filing, reviewing and certifying these reports.</p>	July 2019

Agency: U.S. Commission on Civil Rights	
Report No.: 18-55I	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

5	(10.2)	<p><u>RECOMMENDATION:</u> Ensure that the submission of Conflict-of-Interest-Statements throughout USCCR is tracked and documented.</p> <p><u>AGENCY RESPONSE:</u> The DAEO will work with the Staff Director (who oversees the Chief of the Regional Staff) to have the tracking sheets filled out and updated. The DAEO and ADAEO will circulate tracking templates to regional staff.</p>	July 2019
6	(10.6)	<p><u>RECOMMENDATION:</u> Provide all Advisory Committee SGEs written material containing instructions for accessing a summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary</p> <p><u>AGENCY RESPONSE:</u> The DAEO and ADAEO will provide information to regional ethics staff to be distributed to Advisory Committee SGEs. The Staff Director will work with the Chief of the Regional Staff to implement the distribution.</p>	July 2019
7	(10.7, 10.8)	<p><u>RECOMMENDATION:</u> Provide all initially appointed Advisory Committee SGEs initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> The DAEO and ADAEO will provide guidance to regional staff for initial ethics training. The Staff Director will work with the Chief of the Regional Staff to complete initial ethics training following appointment.</p>	July 2019