



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

January 5, 2015

Frank A. Manies
Designated Agency Ethics Official
American Battle Monuments Commission
2300 Clarendon Boulevard, Suite 500
Arlington, VA 22201-3367

Dear Mr. Manies:

As a result of the onsite plenary review of the American Battle Monuments Commission (ABMC), the United States Office of Government Ethics (OGE) issued nine recommendations in its April 2013 ethics program review report. In November 2013, OGE conducted a follow-up review to assess the implementation of the recommendations which resulted in three closed recommendations. A second follow-up review performed in November 2014 resulted in the closing of the remaining six recommendations.

	Recommendation	Agency Action	Status
1	Finalize written procedures to administer the public and confidential financial disclosure systems.	ABMC finalized written procedures to administer public and confidential financial disclosure systems that fully met the content requirements.	Closed
2	Create an annual ethics training plan for 2013.	ABMC provided annual training plans for both 2013 and 2014.	Closed
3	Develop an action plan to ensure that all new employees receive initial ethics orientation.	ABMC included in its annual training plan an explanation of its process to ensure all new employees receive initial ethics orientation.	Closed
4	Institute a tracking or certification mechanism to ensure proper documentation exists to verify that covered employees receive initial ethics orientation and annual ethics training.	ABMC implemented a tracking system to record completion of annual ethics training for all covered employees. Additionally, the tracking system records start dates, initial ethics orientation due dates, and initial ethics orientation completion dates for new employees.	Closed
5	Provide all covered employees with annual ethics training.	ABMC provided ethics training to all covered employees in 2014 that fully met the content requirements.	Closed

6	Provide ethics training to ABMC Commissioners and institute an action plan to ensure that training is provided on an annual basis.	ABMC provided ethics training to all ABMC Commissioners that fully met the content requirements. ABMC also included in its annual training plan an explanation of its process to ensure all Commissioners receive annual ethics training.	Closed
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Thank you for your assistance during the follow-up review. We encourage you to contact your Desk Officer for ethics program support.

Sincerely,



Doug Chapman
Acting Deputy Director for Compliance