



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

March 07, 2014

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

Dear Mr. Manies:

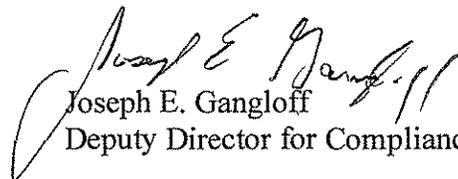
As a result of the onsite plenary review of the American Battle Monuments Commission (ABMC) the United States Office of Government Ethics (OGE) issued nine recommendations in its April 2013 ethics program review report. In November 2013 OGE conducted a follow-up to assess the implementation of the recommendations. Based on the follow-up, we have determined that six recommendations have not been implemented:

	Recommendation	Agency Action	Status
1	Finalize written procedures to administer the public and confidential financial disclosure systems.	ABMC did not provide OGE with final, written procedures to administer the public and confidential financial disclosure systems.	Open
2	Collect a missing public financial disclosure report section and complete the review and certification of the report.	ABMC collected, reviewed, and certified the missing financial disclosure report.	Closed
3	Create an annual ethics training plan for 2013.	ABMC did not provide OGE with an annual ethics training plan for 2013.	Open
4	Develop an action plan to ensure that all new employees receive initial ethics orientation.	ABMC did not provide OGE with any details on its action plan.	Open
5	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 indicated it planned to implement a tracking spreadsheet to ensure completion of training. However, the agency did not provide OGE with a tracking spreadsheet.	Open
6	Provide all covered employees with annual ethics training for 2013.	ABMC did not provide annual ethics training in 2013.	Open
7	Ensure ethics advice and counsel provided to government employees are provided by Government personnel only.	ABMC confirmed that all advice and counsel will be provided only by the DAEO or ADAEO.	Closed

8	Cease requiring employees to obtain permission to engage in outside activities without first establishing a supplemental regulation under 5 C.F.R. § 2635.105(a) providing that authority.	ABMC confirmed that it no longer requires employees to obtain permission to engage in outside activities.	Closed
9	Provide ethics training to ABMC Commissioners, who have not received ethics training for at least two years, and institute an action plan to ensure that training is provided on an annual basis.	ABMC did not provide ethics training to its Commissioners in 2013.	Open

Thank you for your assistance during the follow-up process. OGE will perform a second follow-up in 2014 to assess the outstanding recommendations. We encourage you to contact your Desk Officer for ethics program support.

Sincerely,


Joseph E. Gangloff
Deputy Director for Compliance