

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Appalachian Regional Commission

Report No.: 18-35I

Date: May 30, 2018

Period Covered by Review: January 1, 2017 – December 31, 2017

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

1.0 AGENCY DATA		
<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.	4
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	1
1.3	Number of non-PAS public financial disclosure reports required to be filed.	2
1.4	Number of confidential financial disclosure reports required to be filed.	1
<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	Chief of Staff
1.6	Grade level of DAEO.	GS-15
1.7	Title of Alternate DAEO (ADAEO).	Budget and Program Analyst
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Chief of Staff
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-15
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
<b>COMMENTS</b>		
None		

2.0 LEADERSHIP				
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See 5 C.F.R. § 2638.202(c).</i>	<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 5 C.F.R. § 2638.202(c).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
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 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).				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).				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).				50%
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).				50%
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					
<p>(3.4) The Appalachian Regional Commission (ARC) did not have any filers subject to the late filing fee during the period covered by the inspection.</p> <p>(3.6) OGE found that ARC had retained public reports beyond the required six-year retention period and recommended that reports more than six years old be destroyed. The DAEO later confirmed to OGE that reports more than six years old had been destroyed, as required.</p> <p>(3.9) No non-PAS new entrant reports were required to be filed during the period covered by the inspection.</p> <p>(3.12, 3.13) OGE found that one of the two non-PAS annual reports required to be filed during the period covered by the inspection was not reviewed and certified timely. According to ARC ethics officials, the DAEO's report was reviewed and certified late due to the oversight of the agency head, who was the certifying official. The agency has determined that, due to the busy schedule of the agency head, the ADAEO will be responsible for the review and certification of the DAEO's reports in the future. OGE has determined that the late review and certification of this report is an isolated incident and not a systemic deficiency; therefore, OGE is not issuing a recommendation for improvement.</p> <p>(3.15) No PAS termination reports were required to be filed during the period covered by the inspection.</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 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 5 C.F.R. § 2634.604.</i>	<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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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>	100%			
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>	100%			
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>	100%			
COMMENTS					
<p>(4.4) OGE found that ARC had retained confidential reports beyond the required six-year retention period and recommended that reports more than six years old be destroyed. The DAEO later confirmed to OGE that reports more than six years old had been destroyed, as required.</p> <p>(4.5) ARC does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>(4.7) No confidential new entrant reports were required to be filed during the period covered by the inspection.</p>					

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
<p>(5.1 – 5.5) ARC did not have any new employees during the period covered by the inspection.</p> <p>(5.6) ARC had not established written procedures for issuing the required notice to prospective employees prior to OGE's onsite visit. Subsequent to the onsite visit, ARC developed written procedures for issuing notices to prospective employees.</p> <p>(5.7) The written procedures developed subsequent to OGE's onsite visit include a commitment that the DAEO would review the procedures each year, as required.</p> <p>(5.8) ARC had not established written procedures for issuing the required notice to prospective employees prior to OGE's onsite visit. Subsequent to the onsite visit, ARC developed written procedures for issuing the notice to new employees and for the DAEO's annual review. OGE determined that ARC's newly developed written procedures provide an effective process for ensuring all covered employees receive required information with their written offer of employment.</p>				

<b>6.0 Notices to New Supervisors</b>				
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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 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 checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
<p>(6.1 – 6.4) No new supervisors were appointed during the period covered by the inspection.</p> <p>(6.5) ARC had not established written procedures for issuing the required supervisory ethics notices prior to OGE's onsite visit. Subsequent to the onsite visit, ARC developed written procedures for issuing supervisory ethics notices.</p> <p>(6.6) The written procedures developed subsequent to OGE's onsite visit include a commitment that the DAEO would review the procedures each year, as required.</p> <p>(6.7) ARC had not established written procedures for issuing the required notice to prospective employees prior to OGE's onsite visit. Subsequent to the onsite visit, ARC developed written procedures for issuing notices to new supervisors and for the DAEO's annual review. OGE determined that ARC's written procedures provide an effective process for ensuring that new supervisors receive the required information within one year of appointment.</p>				

<b>7.0 Initial Ethics Training</b>				
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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 5 C.F.R. § 2638.304(e)(2).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	<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 5 C.F.R. § 2638.304(f).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>DATA ANALYSIS</b>		<b>%</b>		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	N/A		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	N/A		
<b>COMMENTS</b>				
<p>(7.1, 7.2) ARC did not have any new employees during the period covered by the inspection.</p> <p>(7.4) ARC's DAEO did not review the written procedures each year; however, after the onsite visit, the written procedures were updated to require an annual review by the DAEO.</p> <p>(7.5, 7.6) ARC did not have any new employees during the period covered by the inspection.</p>				

<b>8.0</b>	<b>Annual Ethics Training</b>				
<b>COMPLIANCE REQUIREMENTS</b>			<b>Yes</b>	<b>No</b>	<b>N/A</b>
Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See 5 C.F.R. §§ 2638.307 and 2638.308.</i>					
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	<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 5 C.F.R. § 2638.304(e)(2).</i>	<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 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>	<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 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>	<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 5 C.F.R. § 2638.308(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>DATA ANALYSIS</b>			<b>%</b>		
<b>Employee Information and Annual Ethics Training</b>			<b>Training Format</b>		
			<b>Live</b>	<b>Interactive</b>	
Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.308(a).</i>					
8.6	<ul style="list-style-type: none"> <li>• Executive Schedule Level I and Level II. <i>See 5 C.F.R. § 2638.308(e)(1).</i></li> </ul>	<b>N/A</b>	<b>N/A</b>		
8.7	<ul style="list-style-type: none"> <li>• Other PAS and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(2).</i></li> </ul>	<b>100%</b>	<b>100%</b>		

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8.8	<ul style="list-style-type: none"> <li>SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).</li> </ul>	N/A	N/A
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"> <li>Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).</li> </ul>	100%	100%
8.10	<ul style="list-style-type: none"> <li>Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).</li> </ul>	N/A	N/A
8.11	<ul style="list-style-type: none"> <li>Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).</li> </ul>	N/A	N/A
8.12	<ul style="list-style-type: none"> <li>Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).</li> </ul>	N/A	N/A
8.13	<ul style="list-style-type: none"> <li>Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).</li> </ul>	N/A	N/A
<b>COMMENTS</b>			
(8.6 and 8.10 – 8.13) ARC did not have any employees in these categories during the period covered by the inspection.			

### 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"/>
<b>COMMENTS</b>				
(9.1) According to the DAEO, the agency did not provide written ethics counseling during the period covered by the inspection.				

### 10.0 Special Government Employees (SGE)

#### Confidential Financial Disclosure

10.1	Number of SGEs serving on Advisory Committees and Boards.	0
<b>DATA ANALYSIS</b>		<b>%</b>
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>DATA ANALYSIS</b>		<b>%</b>		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	N/A		
<b>COMMENTS</b>				
(10.2 - 10.9) ARC does not have any SGEs.				

### ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

#	Element	ISSUE
1	3.6	<u>ISSUE:</u> Public financial disclosure reports were not retained in accordance with established requirements. <u>AGENCY RESPONSE:</u> The DAEO confirmed to OGE that reports more than six years old had been destroyed, as required.
2	4.4	<u>ISSUE:</u> Confidential financial disclosure reports were not retained in accordance with established requirements. <u>AGENCY RESPONSE:</u> The DAEO confirmed to OGE that reports more than six years old had been destroyed, as required.
3	5.6	<u>ISSUE:</u> ARC had not established written procedures for issuing the notice to prospective employees. <u>AGENCY RESPONSE:</u> The ethics office developed written procedures for issuing notices to prospective employees.
4	5.7	<u>ISSUE:</u> There was no provision for the DAEO's annual review of the agency's written procedures for issuing the notice to prospective employees <u>AGENCY RESPONSE:</u> The ethics office developed written procedures which include a commitment by the DAEO to review these procedures each year.
5	5.8	<u>ISSUE:</u> ARC had not established an effective process for ensuring all covered employees receive the required information with their written offer of employment. <u>AGENCY RESPONSE:</u> The ethics office developed written procedures describing a process for providing all covered employees with the required information with their written offer of employment.
6	6.5	<u>ISSUE:</u> ARC had not established written procedures for issuing notices to new supervisors. <u>AGENCY RESPONSE:</u> The ethics office developed written procedures for issuing notices to new supervisors.



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Period Covered by Review: January 1, 2017 – December 31, 2017



7	6.6	<p><u>ISSUE:</u> There was no provision for the DAEO's annual review of the agency's written procedures for issuing the notice to new supervisors.</p> <p><u>AGENCY RESPONSE:</u> The ethics office developed written procedures which include a commitment by the DAEO to review these procedures each year.</p>
8	6.7	<p><u>ISSUE:</u> ARC had not developed a process for ensuring all new supervisors receive the required information within one year of appointment.</p> <p><u>AGENCY RESPONSE:</u> The ethics office developed written procedures describing a process for providing all new supervisors with the required information within one year of appointment.</p>
9	7.4	<p><u>ISSUE:</u> There was no provision for the DAEO's annual review of the agency's written procedures for initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> The ethics office updated the written procedures to include a review by the DAEO each year.</p>