

**ETHICS PROGRAM INSPECTION REPORT**

Agency: The Denali Commission

Report No.: 18-371

Date: June 27, 2018

Period Covered by Review: January 1 – 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.	15
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.	1
1.4	Number of confidential financial disclosure reports required to be filed.	4
<b>ETHICS PROGRAM</b>		
1.4	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.5	Grade level of DAEO.	GS-15
1.6	Title of Alternate DAEO (ADAEO).	Federal Co-chairperson
1.7	Grade level of ADAEO.	EX-IV
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.	GS-15
1.10	Current number of full-time ethics officials.	0
1.11	Current number of part-time ethics officials.	1
1.12	Number of reporting levels between the DAEO and the agency head.	1
<b>COMMENTS</b>		
None.		

2.0 LEADERSHIP		Yes	No	N/A
<b>COMPLIANCE REQUIREMENTS</b>				
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"/>
<b>COMMENTS</b>				
None.				

3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)		Yes	No	N/A
<b>COMPLIANCE REQUIREMENTS</b>				
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"/>

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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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>DATA ANALYSIS</b>		<b>%</b>		
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).	N/A		
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).	100%		
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).	100%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	N/A		
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).	N/A		
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).	N/A		
<b>COMMENTS</b>				
<p>(3.4) The Denali Commission (the Commission) did not have any filers who were subject to the late filing fee or required a waiver during the period under review.</p> <p>(3.6) OGE found that the Commission 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>(3.7) The DAEO position is the only position whose incumbent is required to file a public report.</p> <p>(3.8) The DAEO is the only Commission employee required to file a termination report.</p> <p>(3.9, 3.11) No non-PAS new entrant or termination reports were required to be filed during the period under review.</p> <p>(3.14 – 3.17) The Commission has no PAS officials.</p>				

<b>4.0</b>	<b>CONFIDENTIAL FINANCIAL DISCLOSURE</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	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. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>DATA ANALYSIS</b>		<b>%</b>		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	100%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%		
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%		
<b>COMMENTS</b>				
<p>(4.4) OGE found that the Commission 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) The Commission does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>(4.6) The Commission's DAEO is directly involved in the hiring of all employees and therefore does not require outside notification of appointments to confidential filing positions.</p>				

<b>5.0</b>	<b>Notices to Prospective Employees</b>			
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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"> <li>• A statement regarding the agency's commitment to government ethics.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> <li>• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"> <li>• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> <li>• Where applicable, notice of the time frame for completing initial ethics training.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> <li>• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.</li> </ul>	<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 type="checkbox"/>	<input checked="" 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 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
(5.6 – 5.7) The Commission had not established written procedures for issuing the required notice to prospective employees prior to the start of OGE's inspection. During the inspection, the Commission developed written procedures for issuing notices to prospective employees. These procedures state that the DAEO will review the procedures each year, as required.				

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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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	
COMMENTS					
<p>(6.1 – 6.4) The Commission has not appointed any new supervisors since the establishment of the requirements found at 5 C.F.R. § 2638.306. The Commission has a template for issuing notices to new supervisors that meets all relevant requirements.</p> <p>(6.5 – 6.6) The Commission had not established written procedures for issuing the required supervisory ethics notice prior to the start of OGE's inspection. During the inspection, the Commission developed written procedures for issuing supervisory notices. These procedures state that the DAEO will review the procedures each year, as required.</p> <p>(6.7) OGE determined that the Commission's newly developed written procedures appear to provide an effective process for ensuring that all new supervisors receive the required information within one year of their appointment. OGE was not able to verify that the written procedures are effective because there were no new appointments to supervisory positions while the review was ongoing. However, given the size and nature of the Commission's structure and our review of their procedures, OGE made no recommendation other than that regarding the drafting of the required procedures.</p>					

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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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.	100%			
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).	0%			

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COMMENTS
<p>(7.1 – 7.2) The Commission did not provide a live or interactive presentation to new employees or provide employees with additional required materials or written instructions for accessing them during the period under review. Thus far in 2018, the Commission has provided all new employees with live ethics training and the required written materials.</p> <p>(7.3 – 7.4) The Commission had not established written procedures for initial ethics training prior to the start of OGE’s inspection. During the inspection, the Commission developed written procedures for initial ethics training. The procedures state that the DAEO will review the procedures each year, as required.</p> <p>(7.6) Although certain that new employees received initial ethics training during the period under review, the Commission did not track the exact dates when the training was received and was unable to determine whether the new employees received initial ethics training within three months of their appointment. During the inspection, the DAEO developed and implemented a tracking system that compares an employee’s appointment date to the date the employee receives training. Thus far in 2018, all new employees have been trained within three months of their appointment.</p>

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 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</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 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</i> 5 C.F.R. § 2638.308(e)(2).				<input checked="" type="checkbox"/>	<input 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"> <li>Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).</li> </ul>				N/A	N/A	
8.7	<ul style="list-style-type: none"> <li>Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).</li> </ul>				N/A	N/A	
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>				100%	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>				0%	0%	
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	

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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>			
<p>(8.2) Covered employees did not receive the required written materials during the period covered by this inspection. The Commission resolved this issue by providing all covered employees with a written summary of the Standards of Conduct along with instructions for contacting the agency's ethics officials during their 2018 annual ethics training.</p> <p>(8.3) The annual training provided by the Commission during the period covered by this inspection was neither live nor interactive, as required. The Commission resolved this issue by providing all covered employees with live annual ethics training during 2018.</p> <p>(8.5) The DAEO is the only public filer at the Commission.</p> <p>(8.6 – 8.7 and 8.10 – 8.13) The Commission did not have any employees in these categories during the period covered by the inspection.</p> <p>(8.9) Ethics officials emailed a series of slides to confidential filers. The slide presentation required only that the employee advance from one slide to the next. As such, it did not meet the criteria that define interactive training. <i>See</i> 5 C.F.R. § 2638.302(b). The Commission resolved this issue by providing all covered employees with live annual ethics training during 2018.</p>			

<b>9.0 ETHICS ADVICE AND COUNSELING</b>						
<b>COMPLIANCE REQUIREMENT</b>				<b>Yes</b>	<b>No</b>	<b>N/A</b>
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) The Commission's ethics officials did not provide any written ethics guidance to employees during the period under review.						

<b>10.0 Special Government Employees (SGE) Serving on Advisory Committees and Boards</b>							
<b>Confidential Financial Disclosure</b>							
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		
<b>Ethics Training</b>							
<b>COMPLIANCE REQUIREMENTS</b>				<b>Yes</b>	<b>No</b>	<b>N/A</b>	
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"/>
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"/>

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	DATA ANALYSIS	%
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>		
(10.1 – 10.9) Prior to 2017, there were six SGEs at the Commission, all of whom served as Commissioners. A 2016 amendment to the Denali Commission's enabling legislation changed the employment status of the Commissioners, who are no longer classified as 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, 5.7	<u>ISSUE:</u> The Commission had not established written procedures for issuing the required notice to prospective employees. <u>AGENCY RESPONSE:</u> The Commission developed written procedures for issuing the required notices to prospective employees that include a commitment by the DAEO to review these procedures each year.
4	6.5, 6.6	<u>ISSUE:</u> The Commission had not established written procedures for issuing the required notices to new supervisors. <u>AGENCY RESPONSE:</u> The Commission developed written procedures for issuing the required notices to new supervisors, which include a commitment by the DAEO to review these procedures each year.
5	7.3, 7.4	<u>ISSUE:</u> The Commission had not established written procedures for initial ethics training. <u>AGENCY RESPONSE:</u> The Commission developed written procedures for initial ethics training that include a commitment by the DAEO to review these procedures each year.
6	7.1	<u>ISSUE:</u> Ensure that all new employees receive interactive (or live) initial ethics training that addresses concepts related to conflicts of interest, impartiality, misuse of position and gifts. <u>AGENCY RESPONSE:</u> The agency provided live training to all new employees on June 19, 2018 that addressed the four key concepts mentioned above. The agency does not anticipate hiring additional employees in 2018, but will provide new employees initial ethics training if needed.

## ETHICS PROGRAM INSPECTION REPORT

Agency: The Denali Commission

Report No.: 18-37I

Date: June 27, 2018

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

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

7	7.2	<p><u>ISSUE:</u> Ensure that all new employees receive written materials or written instruction for accessing them.</p> <p><u>AGENCY RESPONSE:</u> The DAEO provided all new employees with the required written materials on the same day the DAEO provided the live training.</p>
8	7.6	<p><u>ISSUE:</u> Implement a system to track when new employees receive initial ethics training and ensure that new employees receive initial ethics training within three months of their appointment.</p> <p><u>AGENCY RESPONSE:</u> The DAEO has added a column in the Excel spreadsheet to track initial ethics training for new employees. For 2018, all new employees have been trained within three months of their appointment.</p>
9	8.2	<p><u>ISSUE:</u> Ensure that all covered employees receive written materials or written instruction for accessing them as part of their annual ethics training.</p> <p><u>AGENCY RESPONSE:</u> The DAEO provided all covered employees with the required written materials on the same day the DAEO provided their live annual ethics training.</p>
10	8.3, 8.9	<p><u>ISSUE:</u> Ensure that all covered employees receive either live or interactive annual ethics training each year.</p> <p><u>AGENCY RESPONSE:</u> All covered employees were provided live annual ethics training on June 19, 2018.</p>