



September 28, 2017

MEMORANDUM FOR: Paul N. Lekas, General Counsel

FROM: Dr. Joseph Heck, Chair

SUBJECT: Delegation of Authority for Ethics Program

Pursuant to my authority under 5 U.S.C. §302(b) and the regulations at 5 C.F.R. part 2638, I appoint the General Counsel as the Designated Agency Ethics Official (DAEO) for the National Commission on Military, National, and Public Service (the Commission), and hereby delegate to you the authority to coordinate and manage the ethics program for the Commission and otherwise carry out the duties set forth at 5 C.F.R. Part 2638, subpart B.

This authority includes responsibility for implementing the financial disclosure systems required for Commissioners and staff under 5 C.F.R. part 2634. This includes, but is not limited to, the authority to:

- (a) Determine the positions for staff personnel that are subject to the requirements for filing confidential disclosure reports (5 C.F.R. §§2634.904-905) or positions subject to the requirements for filing public disclosure reports (5 C.F.R. part 2634, subpart B);
- (b) Review and certify reports submitted to the Commission in accordance with Commission procedures (5 C.F.R. §2634.605), other than the report submitted by the DAEO;
- (c) Determine appropriate remedial action after determining that there exists a conflict, or the appearance of a conflict, between the interests of an employee other than the DAEO and the performance of the employee's service for the Government (5 C.F.R. §2634.605(b)(5)); and,
- (d) Make final determinations regarding an individual's complaint that his or her position has been improperly determined to be one that requires the submission of a confidential financial disclosure report (5 C.F.R. §2634.905). You may not redelegate the authority to make such final determinations to anyone else.

This authority may be redelegated as permitted by 5 C.F.R. Parts 2634 and 2638 and discussed above. This authority supersedes all previous delegations of this authority that may have been issued.

DR. JOSEPH HECK  
Chair