

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: National Security Agency

Follow-up to OGE Report Number: 23-54I

Report No.: 25-11IF

Date: November 15, 2024

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**
Preventing Conflicts of Interest
in the Executive Branch

As a result of its inspection of the National Security Agency's (NSA) ethics program, the Office of Government Ethics (OGE) issued eight recommendations in its September 2023 inspection report. OGE conducted a follow-up review in September 2024 to assess whether NSA had taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Destroy all public and confidential financial disclosure reports found to exceed the six-year retention period in accordance with the retention requirements at 5 C.F.R. § 2634.604.	During the follow-up review, ethics officials confirmed that all public and confidential financial disclosure reports that exceeded the six-year retention period were purged.	Closed
2	Ensure that all public and confidential financial disclosure reports are certified within 60 days of receipt.	During the follow-up review, OGE determined that 96 percent of the public and confidential financial disclosure reports filed in 2024 were certified within 60 days of receipt.	Closed
3	Ensure that all written notices to new supervisors meet the requirements of 5 C.F.R. § 2638.306.	Written procedures for issuing notices to new supervisors were established by the Ethics Office, as required.	Closed
4	Develop written procedures for issuing notices to new supervisors and ensure supervisors receive the notices as required by 5 C.F.R. § 2638.306(d).	The Ethics Office established written procedures for notifying new supervisors, as required. OGE also confirmed that ethics officials implemented a system to ensure newly appointed supervisors receive the necessary notice.	Closed
5	Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f).	Written procedures for initial ethics training were established by the Ethics Office, as required.	Closed
6	Ensure that all new employees outside of NSA-Washington are provided initial ethics training within three months of their appointment as required by 5 C.F.R. § 2638.304 and 2638.304(b).	According to a training completion spreadsheet provided by ethics officials regarding new employees hired outside of NSA-Washington, 94.7% of new hires between June 2 and August 26, 2024, completed their initial ethics training within the required 90 days. The remaining 5.3% completed the training after the 90-day deadline. OGE is closing this recommendation and will reevaluate this area of the agency's ethics program during its next inspection review.	Closed

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7	Ensure that all SGE members indicate their reporting status on the first page of the confidential report as New Entrant each year.	OGE will keep this recommendation open pending additional follow-up.	Open
8	Ensure that all SGE confidential financial disclosure reports are certified within 60 days of receipt.	OGE will keep this recommendation open pending additional follow-up.	Open

Based on the results of OGE's follow-up review, recommendations 1, 2, 3, 4, 5 and 6 are closed. Recommendations 7 and 8 remain open. OGE will conduct an additional follow-up review to assess whether the remaining two recommendations can be closed.