

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Defense Intelligence Agency (DIA)

Report No.: 23-381

Date: August 8, 2023

Period Covered by Review: January 1, 2022 through December 31, 2022

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

1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	16,500
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.	264
1.4	Number of confidential financial disclosure reports required to be filed.	802
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel (Acting)
1.6	Grade level of DAEO.	EP-00
1.7	Title of Alternate DAEO (ADAEO).	Principal Deputy General Counsel (Acting)
1.8	Grade level of ADAEO.	GG-15
1.9	Title of the primary, day-to-day ethics program administrator.	Associate General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	GG-15
1.11	Current number of full-time ethics officials.	2
1.12	Current number of part-time ethics officials.	35
1.13	Number of reporting levels between the DAEO and the agency head.	1
	COMMENTS	
	(1.2) DIA does not have any PAS positions.  (1.6, 1.8 and 1.10) All positions at DIA are in the excepted service under the 10 USC § 1601 appointment authority and covered by the Defense Civilian Intelligence Personnel System, a General Grade pay system divided into grades and steps similar to OPM’s General Schedule compensation system.	

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</i> 5 C.F.R. § 2638.107(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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. § 2638.107(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<b>COMMENTS</b>			
	(2.1-2.2) At the time of OGE's fieldwork, DIA's ethics program was in a state of transition. The current ADAEO was serving as DIA's acting General Counsel and DAEO after the former General Counsel departed the agency. The acting Principal Deputy General Counsel was serving in the role of ADAEO. As a reminder, once the DIA Director has designated a permanent DAEO and/or ADAEO, DIA must notify OGE of the designation within 30 days using OGE Form 241A.			

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3.0	<b>PUBLIC FINANCIAL DISCLOSURE</b> (OGE Form 278e, OGE Form 278-T)			
<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).				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>
<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).	93%		
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).	83%		
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).	73%		
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>(3.1 – 3.3) The DIA public financial disclosure system is administered in accordance with the financial disclosure procedures contained in Chapter 7 of the Department of Defense (DoD) Joint Ethics Regulation (JER). These procedures comply with regulatory requirements mandating that agencies have written procedures governing the administration of financial disclosure systems.</p> <p>(3.4) According to the DIA's response to their annual questionnaire for 2022, one public filer terminated employment from DIA without completing a termination public report. Ethics officials indicated that they would continue to engage with this filer until the report was successfully completed. Prior to the conclusion of this inspection, OGE was advised that the termination public report in question was collected. Ethics officials indicated that the late filing fee was waived because the filer's position transfer caused confusion over filing.</p> <p>(3.11) Of the 18 termination reports examined, 3 (17%) were filed more than 30 days after the required due date with no indication as to whether a filing extension had been granted by ethics officials. In one instance, even if a 90-day filing extension had been granted, one termination filer would have still been subject to the \$200 fine for late filing fee. OGE acknowledges the difficulties agencies can encounter</p>				

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when trying to collect a termination report after a filer has left Government service. To promote timely filing, OGE has determined that DAEOs may permit the agency's departing public filers to file termination reports up to 15 days before their termination date, provided that the filers agree to update their reports in the event that there are changes to reportable information before or on their termination date. In such cases, ethics officials should counsel the filers and emphasize their affirmative obligation to update the report as agreed. When an agency accepts a termination report before the termination date, the report should include a public annotation indicating that the filer has agreed to update the report if there are changes before or on the termination date. (See OGE Program Advisory PA-16-06.)

(3.13) OGE determined that 24 of the 85 public reports it sampled were certified more than 60 days after they were filed, the majority of which were annual reports. In some instances, certification past 60 days occurred due to ethics officials seeking additional information before final certification could occur.

(3.14 – 3.17) DIA does not have any PAS positions.

**4.0 CONFIDENTIAL FINANCIAL DISCLOSURE****COMPLIANCE REQUIREMENTS****Yes****No****N/A**

The agency has written policies and procedures in place governing: See 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. See 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. See 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. See 5 C.F.R. § 2634.905(a).	<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. See 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**DATA ANALYSIS****%**

4.7	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).	93%
4.8	Percentage of sampled confidential annual reports filed timely. See 5 C.F.R. § 2634.903(a).	100%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).	100%
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	100%

**COMMENTS**

(4.1 – 4.3) The DIA confidential financial disclosure system is administered in accordance with the financial disclosure procedures contained in Chapter 7 of the DoD JER. These procedures comply with regulatory requirements mandating that agencies have written procedures governing the administration of financial disclosure systems.

(4.5) DIA does not have an OGE-approved alternative confidential financial disclosure system.

**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: See 5 C.F.R. § 2638.303.

5.1	• A statement regarding the agency's commitment to government ethics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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>				
(5.4) OGE examined a sample of job offer notices sent to prospective employees and found the letters to address all required content requirements, except an explanation regarding the timeframe for completing initial ethics training. Prior to the conclusion of this inspection, ethics officials confirmed that the time period for completing initial ethics training is now included in all written offer notices to prospective employees. As a result, OGE is not making a recommendation for improvement in this area.				

6.0	<b>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	<ul style="list-style-type: none"> <li>Contact information for the agency's ethics office.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"> <li>The text of 5 C.F.R. § 2638.103.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none"> <li>A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"> <li>Other information the DAEO deems necessary.</li> </ul>	<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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
(6.3) DIA includes the required ethics language for new supervisors on the employees SF 52 (Request for Personnel Action form) in Part D – Remarks by Requesting Office section. OGE examined a sample of these forms sent to new DIA supervisors and found the content did not consistently include the website link to the address containing the Principles of Ethical Conduct (Principles). Prior to the conclusion of this inspection, ethics officials confirmed with their Office of Human Resources team that all notices to new supervisors will consistently include the website link to the Principles. OGE is not making a recommendation for improvement in this area.				

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in the Executive Branch**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. *See 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. *See 5 C.F.R. § 2638.304(e)(1).*☒☐☐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. *See 5 C.F.R. § 2638.304(e)(2).*☒☐☐7.3 The agency has established written procedures for initial ethics training. *See 5 C.F.R. § 2638.304(f).*☒☐☐7.4 The agency's written procedures are reviewed by the DAEO each year. *See 5 C.F.R. § 2638.304(f).*☒☐☐**DATA ANALYSIS****%**7.5 Percentage of new employees who received initial ethics training. *See 5 C.F.R. § 2638.304.*

100%

7.6 Percentage of new employees who received initial ethics training within three months of appointment. *See 5 C.F.R. § 2638.304(b).*

100%

**COMMENTS**

(7.1) OGE examined the initial ethics training presentation provided to new DIA employees and found the presentation to address all required concepts. However, the training was less than fulsome with respect to addressing the concept of misuse of position. While OGE is not making a formal recommendation in this area, OGE suggests that in future trainings, ethics officials make certain to highlight each of the four topics through discussion questions or summary statements by the instructor to ensure that each concept is adequately addressed.

**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. *See 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. *See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).*☒☐☐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. *See 5 C.F.R. § 2638.304(e)(2).*☒☐☐8.3 The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. *See 5 C.F.R. §§ 2638.307(d) and 2638.308(e).*☒☐☐8.4 The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. *See 5 C.F.R. §§ 2638.307(f) and 2638.308(g).*☒☐☐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. *See 5 C.F.R. § 2638.308(e)(2).*☒☐☐

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	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	• Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	N/A
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	See reviewer comment	See reviewer comment
	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	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	See reviewer comment	See reviewer comment
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	N/A	N/A
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	N/A
	<b>COMMENTS</b>		
	<p>(8.1) OGE found the annual ethics training presentation for confidential filers provided during the period under inspection to address all required concepts. However, OGE found the annual training presentation for public filers to be less than fulsome with respect to addressing the concept of misuse of position. While OGE is not making a formal recommendation, OGE suggests that in future trainings, ethics officials make certain to highlight each of the four topics through discussion questions or summary statements by the instructor to ensure that each concept is adequately addressed.</p> <p>(8.6, 8.7, 8.10 -8.12) DIA does not have employees in these categories.</p> <p>(8.8) According to DIA's annual training completion document for public filers and DIA's response to the annual questionnaire for 2022, 221 public filers were required to receive annual ethics training in 2022. To accomplish this, filers are required to attend either live or interactive training. According to DIA's response to the annual questionnaire, four live training sessions were offered for public filers in addition to interactive training. Of the 221 public filers required to receive annual ethics training in 2022, 202 (91%) were trained by the end of 2022. The remaining 19 public filers did not complete their annual training requirement by the end of 2022 despite ethics officials sending multiple and recurring reminders to these filers, their supervisors, and staff directors. Ethics officials indicated that they also sent email reminders to employees regarding the annual training requirement in weekly agency-wide emails. According to ethics officials, those who still needed to complete training for 2022 are still expected to complete their 2022 and 2023 training in calendar year 2023.</p> <p>(8.9) According to DIA's response to the annual questionnaire for 2022, 779 confidential filers were required to receive annual ethics training in 2022. To accomplish this, filers are required to attend either live or interactive training. According to DIA's response to the annual questionnaire, ten live training sessions were offered to confidential filers in addition to interactive training. Of the 779 confidential filers required to receive annual training in 2022, only 681 confidential filers (87%) actually received the training by the end of the 2022. The remaining 98 confidential filers did not complete their annual training requirement by the end of 2022 despite ethics officials sending multiple and recurring reminders to filers, their supervisors, and staff directors to complete the training. Ethics officials indicated they also included reminders regarding the training requirement in weekly agency-wide emails. As with the public filers, those confidential filers who did not complete training for 2022 are still expected to complete their 2022 and 2023 training during calendar year 2023.</p>		

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None

**10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS****Confidential Financial Disclosure**

10.1 Number of SGEs serving on Advisory Committees and Boards.

0

**DATA ANALYSIS****%**10.2 Percentage of sampled confidential new entrant reports filed timely. *See 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. *See 5 C.F.R. § 2634.605(a).*

N/A

10.4 Percentage of sampled reports certified within 60 days of receipt. *See 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. *See 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. *See 5 C.F.R. § 2638.304(e)(1).*☐☐☒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. *See 5 C.F.R. § 2638.304(e)(2).*☐☐☒**DATA ANALYSIS****%**10.7 Percentage of SGEs who received initial ethics training. *See 5 C.F.R. § 2638.304.*

0

10.8 Percentage of SGEs who received initial ethics training timely. *See 5 C.F.R. § 2638.304(b)(2).*

0

10.9 Percentage of SGEs who received annual ethics training. *See 5 C.F.R. § 2638.307(d)(2).*

0

**COMMENTS**

(10.0 – 10.9) DIA had no SGEs during the period under review



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### ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
5.4	<p><u>ISSUE:</u> OGE examined a sample of the job offer notices sent to prospective employees and found the letters to address all required content requirements, except an explanation regarding the timeframe for completing initial ethics training.</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, ethics officials confirmed that the time period for completing initial ethics training is now included in all written offer notices to prospective employees.</p>
6.3	<p><u>ISSUE:</u> OGE examined a sample of the notices sent to new supervisors and found the notice to address all required content requirement, except a consistent reference to the website link to the address containing the Principles of Ethical Conduct (Principles).</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, ethics officials confirmed with their Office of Human Resources team that all notices to new supervisors will now consistently include the website link to the Principles.</p>

### RECOMMENDATION

#	Element	RECOMMENDATION	Compliance Due
1	8.0	<p><u>RECOMMENDATION:</u> Ensure that all covered employees complete the required annual ethics training before the end of the calendar year, as required by 5 C.F.R. § 2638.308(a).</p> <p><u>AGENCY RESPONSE:</u> Continuing efforts began in 2022, we have reduced the number employees missing training to 7 public and 5 confidential filers. Efforts to contact delinquent filers continue and we are leveraging all available tools and resources. We have already seen a significant increase in annual training completion for 2023. Below are components of our planned course of action to further bolster compliance with training requirements.</p> <ul style="list-style-type: none"><li>We have completed an internal audit of our confidential filers to ensure our records are accurate. This included a scrub of FDM and reaching out to current FDM POCs to request updates for their respective organizations.</li><li>Specialized training will be offered to the POCs and Supervisors so they can enforce the filing and training requirements at their organizational level.</li><li>Beginning in September 2023, we will send training reminders once a week via email to all filers. Information on the interactive training will be included in these emails.</li><li>We will provide in-person trainings for public and confidential filers twice a month on Tuesday and Thursdays with morning and afternoon options.</li></ul>	December 2023