

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



June 29, 2017

Mr. Ralph J. Tremaglio
 Acting General Counsel and
 Designated Agency Ethics Official
 Defense Commissary Agency
 1300 E Avenue
 Fort Lee, VA 23801

Dear Mr. Tremaglio:

As a result of its inspection of the Defense Commissary Agency (DeCA) ethics program, the United States Office of Government Ethics (OGE) issued three recommendations in its November 2016 inspection report. OGE recently conducted a follow-up review to determine whether DeCA has taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

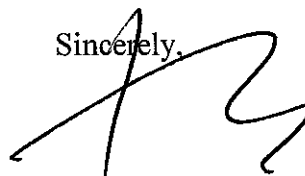
| | Recommendation | Agency Action and OGE Findings | Status |
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| 1 | Develop initial ethics orientation material containing current contact information for ethics officials and provide a copy of the Standards of Ethical Conduct and any agency supplemental standards for employees to keep or review or summaries of the Standards, any agency supplemental standards, and 14 Principles for employees to keep. | DeCA developed new employee ethics training and a customized new employee ethics handbook based on OGE's Ethical Service Handbook. OGE reviewed the revised initial ethics orientation materials and determined the materials meet the applicable content requirements. | Closed |
| 2 | Provide employees at least one hour of official duty time to review the initial ethics orientation materials. | DeCA notified each store of the requirement to provide new employees at least an hour to review the initial ethics materials. OGE determined DeCA provides the required official duty time for new employees to review initial ethics orientation materials. | Closed |



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| 3 | Improve the process for tracking and ensuring that new employees receive initial ethics orientation within 90 days of beginning work. | <p>DeCA identified several challenges while improving the initial ethics orientation process such as a geographic range of worldwide locations and training delays due to employees lacking computer access, a security clearance, or both. DeCA recently implemented solutions by distributing a CD with ethics materials to 249 worldwide locations, as well as designing a new process incorporating human resources staff and store directors to track new employees.</p> <p>OGE selected a sample of new employees and found 76% (130 of 170) completed initial ethics orientation, and 39% (66 of 170) completed initial ethics orientation within 3 months of beginning work.</p> <p>OGE determined DeCA has made vast improvements to tracking new employees and is continuing to improve the process for ensuring that new employees receive initial ethics orientation timely.</p> | Closed |
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I appreciate the courtesies extended to the OGE program inspection staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance