

Agency: Defense Intelligence Agency	
Report No.: 18-58I	Date: September 25, 2018
Period Covered by Review: January 1, 2017 – December 31, 2017	

1.0 AGENCY DATA		
<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.	16,500
1.2	Number of non-PAS public financial disclosure reports required to be filed.	211
1.3	Number of confidential financial disclosure reports required to be filed.	491
<b>ETHICS PROGRAM</b>		
1.4	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.5	Grade level of DAEO.	SES-2
1.6	Title of Alternate DAEO (ADAEO).	Principal Deputy General Counsel
1.7	Grade level of ADAEO.	SES-1
1.8	Title of the primary, day-to-day ethics program administrator.	Associate General Counsel
1.9	Grade level of the primary, day-to-day ethics program administrator.	GG-15
1.10	Current number of full-time ethics officials.	1
1.11	Current number of part-time ethics officials.	25
1.12	Number of reporting levels between the DAEO and the agency head.	1
<b>COMMENTS</b>		
(1.0) During the period under review, the Associate General Counsel/Ethics Program Manager was the only full-time ethics official and was responsible for managing the day-to-day operations of the Defense Intelligence Agency's (DIA) ethics program. Another attorney was recently hired to help manage the program on a full-time basis and started on September 4, 2018. A paralegal reservist has also been assigned to help support the ethics program on a full-time basis from September 2018 until September 2019. Additionally, 25 ethics counselors are available to perform ethics duties on a part-time basis.		

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. § 2638.202(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)				
<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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).	83%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	96%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%		
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).	36%		
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) During the period under review, no late filing fees were required to be collected and no waivers of the fees were required to be issued to public filers.</p> <p>(3.14 -3.17) DIA does not have any PAS officials.</p> <p><u>Concern</u>                  (3.13) OGE selected a sample of 39 public reports to examine, of which 6 were new entrant reports, 25 were annual reports, and 8 were termination reports. OGE identified that 24 of the 39 public reports were certified more than 60 days after they were filed, the majority of which were annual reports.</p>				

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4.0 CONFIDENTIAL FINANCIAL DISCLOSURE					
COMPLIANCE REQUIREMENTS			Yes	No	N/A
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 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. <i>See</i> 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. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
DATA ANALYSIS			%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).				36%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).				64%
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).				74%
COMMENTS					
<p>(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.</p> <p>(4.5) DIA does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>(4.6) Per DoD regulations, supervisors are required to determine whether the duties and responsibilities of a position require the employee to file a confidential report. As part of DIA's mandatory orientation program, new civilian employees and uniformed personnel are required to submit a form to their supervisor on which the supervisor is to certify whether or not the employee is required to file a confidential report. The completed form is then forwarded to the DIA Ethics Office for appropriate action.</p> <p><u>Concerns</u></p> <p>(4.7) To evaluate the timeliness of new entrant confidential financial disclosure filing and certification, OGE selected 25 new entrant confidential reports to examine. Of the 25 new entrant confidential reports examined, 16 were filed late.</p> <p>(4.8) To evaluate the timeliness of annual confidential financial disclosure filing and certification, OGE selected 25 annual confidential reports to examine. Of the 25 annual confidential reports examined, 9 were filed late.</p> <p>(4.10) Of the 50 confidential reports that OGE selected for examination, 13 reports were certified beyond the required 60 days of receipt, the majority of which were annual reports.</p>					

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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: <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 type="checkbox"/>	<input checked="" 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"/>	
COMMENTS					
<p>(5.5) A memorandum dated April 24, 2017, and issued jointly by the Director, DoD Standards of Conduct Office and the (Acting) Deputy Assistant Secretary of Defense, Civilian Personnel Policy, mandated that offer letters include language advising new employees that they “may be required to file” a confidential financial disclosure report. OGE determined that this, along with other measures DoD has taken, is an acceptable adaptation of the requirement to notify new employees regarding their financial disclosure obligations.</p> <p>(5.6) In the April 24, 2017, memorandum, the DOD Standards of Conduct Office notified all DOD components of the new requirement to include the aforementioned ethics information in written offer letters to prospective employees. DIA used this information to notify their own human resource officials of the new requirement, however, written procedures have not been developed, as required.</p>					

6.0 Notices to New Supervisors					
COMPLIANCE REQUIREMENTS			Yes	No	N/A
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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.4	<ul style="list-style-type: none"> <li>Other information the DAEO deems necessary.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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"/>	

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COMMENTS	
	(6.1) OGE did not find the contact information for the agency's ethics office on the notices to new supervisors. Ethics officials agreed to add the contact information to the notices.
	(6.5) In the April 24, 2017, memorandum, the DOD Standards of Conduct Office notified all DOD components of the new requirement to include the aforementioned ethics information in supervisory notices. DIA used this information to notify their own human resource officials of the new requirement, however, written procedures have not been developed, as required.

7.0 Initial Ethics Training		Yes	No	N/A
<b>COMPLIANCE REQUIREMENTS</b>				
Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>				
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	<input checked="" type="checkbox"/>	<input 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 5 C.F.R. § 2638.304(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.304(f).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>DATA ANALYSIS</b>		<b>%</b>		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	100%		
<b>COMMENTS</b>				
None				

8.0 Annual Ethics Training		Yes	No	N/A
<b>COMPLIANCE REQUIREMENTS</b>				
Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See 5 C.F.R. §§ 2638.307 and 2638.308.</i>				
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	<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 5 C.F.R. § 2638.308(f)(2).</i>	<input checked="" type="checkbox"/>	<input 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 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>	<input checked="" type="checkbox"/>	<input 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 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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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"/>
<b>DATA ANALYSIS</b>		<b>Training Format</b>		
		<b>Live</b>	<b>Interactive</b>	
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>	See comment below	See comment below	
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>	See comment below	See comment below	
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	
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>(8.8 -8.9) During the period under review, annual ethics training for both public and confidential filers was provided via in-person, videoconference, or computer/web-based training. The DIA Ethics Office was not however able to breakout specifically how many individuals were trained in-person or via videoconference versus how many were trained online. The Ethics Office tracks training completion within their Financial Disclosure Management (FDM) electronic filing system and while dates of training completion are recorded, the FDM training reports do not track the training format. However, OGE was advised that individuals who received in-person training significantly outnumbered those who took online training for both public and confidential filers, since in-person training was given as part of the annual mandatory DIA Senior Leader Forum for public filers and during four in-person training sessions for confidential filers.</p> <p><u>Concerns</u></p> <p>(8.8) According to DIA’s response to OGE’s Annual Ethics Program Questionnaire (Questionnaire) for 2017, and as confirmed during OGE’s onsite review, 228 public filers were required to receive annual ethics training in 2017, but only 191 public filers actually received the training by the end of the year. The remaining 38 public filers completed their annual training requirement for 2017 in January 2018. OGE reminds ethics officials that 2017 make-up training provided in January 2018 does not count towards annual training for 2018, i.e., these 38 public filers must receive annual training again in 2018.</p> <p>(8.9) According to DIA’s response to the Questionnaire for 2017, and as confirmed during OGE’s onsite review, 529 confidential filers were required to receive annual ethics training. However, only 481 confidential filers actually received the training by the end of the year. Of the 48 confidential filers remaining, 5 completed the annual training for 2017 in January 2018 while the remaining 43 were all trained by February 22, 2018.</p>				

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9.0 ETHICS ADVICE AND COUNSELING					
COMPLIANCE REQUIREMENT			Yes	No	N/A
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
COMMENTS					
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. <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

**Ethics Training**

COMPLIANCE REQUIREMENTS			Yes	No	N/A
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"/>	
DATA ANALYSIS		%			
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	0			
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	0			
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	0			
COMMENTS					
(10.0) DIA had no SGEs during the period under review.					

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RECOMMENDATIONS			
#	Element	RECOMMENDATION	Compliance Due
1	3.13	<p><u>RECOMMENDATION:</u> Ensure that public financial disclosure reports are certified timely.</p> <p><u>AGENCY RESPONSE:</u> The Agency has already taken steps to ensure timely certification of financial disclosure reports by hiring an additional full-time Ethics Attorney, shortening the period for supervisor review and will temporarily augment the ethics team with additional attorneys during the filing season.</p>	August 2019
2	4.7	<p><u>RECOMMENDATION:</u> Ensure that new entrant confidential financial disclosure reports are filed timely.</p> <p><u>AGENCY RESPONSE:</u> The Agency will continue to notify all OGE 450 filers of the February 15th deadline using the Agency’s worldwide electronic tasking system, emails (and reminders) to the individual filer and their supervisors via Financial Disclosure Management (FDM) software program. The Agency will also start the notifications and announcements of the filing deadline earlier, post announcements in the Chief of Staff’s weekly notice to the workforce, and include on the Agency’s web page. The Ethics Program manager will also seek senior level management engagement for filers who are have not submitted their reports by February 1<sup>st</sup>.</p>	August 2019
3	4.8	<p><u>RECOMMENDATION:</u> Ensure that annual confidential financial disclosure reports are filed timely.</p> <p><u>AGENCY RESPONSE:</u> The Agency will continue to notify all OGE 450 filers of the February 15th deadline using the Agency’s worldwide electronic tasking system, emails (and reminders) to the individual filer and their supervisors via Financial Disclosure Management (FDM) software program. The Agency will also start the notifications and announcements of the filing deadline earlier, post announcements in the Chief of Staff’s weekly notice to the workforce, and include on the Agency’s web page. The Ethics Program manager will also seek senior level management engagement for filers who are have not submitted their reports by February 1<sup>st</sup>.</p>	August 2019
4	4.10	<p><u>RECOMMENDATION:</u> Ensure that confidential financial disclosure reports are certified timely.</p> <p><u>AGENCY RESPONSE:</u> The Agency has already taken steps to ensure timely certification of financial disclosure reports by hiring an additional full-time Ethics Attorney, shortening the period for supervisor review and will temporarily augment the ethics team with additional attorneys during the filing season.</p>	August 2019
5	5.6	<p><u>RECOMMENDATION:</u> Establish written procedures for issuing notices to prospective employees, as required by 5 C.F.R. § 2638.303(c).</p> <p><u>AGENCY RESPONSE:</u> The Agency is already working to formalize in writing the procedures it uses to issue the required notices to new hires and supervisors.</p>	August 2019

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6	6.5	<p><u>RECOMMENDATION:</u> Establish written procedures for supervisory ethics notices, as required by 5 C.F.R. § 2638.306(d).</p> <p><u>AGENCY RESPONSE:</u> The Agency is already working to formalize in writing the procedures it uses to issue the required notices to new hires and supervisors.</p>	August 2019
7	8.8	<p><u>RECOMMENDATION:</u> Ensure that public filers complete their 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> Training for public financial disclosure filers will start a month earlier this year. This will allow us to increase the number of in-person training sessions in addition to providing interactive online training via the Agency’s training website. The Agency will implement an improved communications plan to include earlier publication of the various training sessions and education on the importance of filing. We will also seek engagement by supervisors and agency senior leadership to get all filers trained by December 31st excluding those on long-term illness, extended deployment to combat zone, etc.</p>	August 2019
8	8.9	<p><u>RECOMMENDATION:</u> Ensure that confidential filers complete their annual ethics training before the end of the calendar year as required by 5 C.F.R. § 2638.307(a)(d).</p> <p><u>AGENCY RESPONSE:</u> Training for confidential financial disclosure filers will start a month earlier this year. This will allow us to increase the number of in-person training sessions in addition to providing interactive online training via the Agency’s training website. The Agency will implement an improved communications plan to include earlier publication of the various training sessions and education on the importance of filing. We will also seek engagement by supervisors and agency senior leadership to get all filers trained by December 31st excluding those on long-term illness, extended deployment to combat zone, etc.</p>	August 2019