

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



April 19, 2016

George Peirce  
Designated Agency Ethics Official  
Defense Intelligence Agency  
Pentagon Office 2D614  
200 MacDill Boulevard, Building 6000  
Washington, DC 20340-5100

Dear Mr. Peirce:

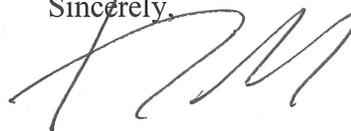
As a result of its review of the Defense Intelligence Agency's (DIA) ethics program, the United States Office of Government Ethics (OGE) issued three recommendations in its February 2015 ethics program review report. In August 2015, OGE conducted a follow-up review which resulted in the closing of two of the three recommendations. OGE conducted a second follow-up review during the months of March and April 2016. Based on the results of the second follow-up review, OGE determined that the actions DIA has taken are sufficient to resolve the deficiency underlying the remaining recommendation. OGE has, therefore, closed the recommendation. The results of our second follow-up review are summarized below.

| Recommendation  |
|---|
| Ensure that all covered employees receive annual ethics training in 2015.   |
| Agency Action   |
| <p>In 2015, DIA had 636 financial disclosure filers who were required to receive annual ethics training. Of the 636 filers, 247 were public filers and 389 were confidential filers. By the end of 2015, DIA had provided annual training to 541 of the 636 filers who were required to receive it, including all 247 public filers and 294 of the 389 confidential filers.</p> <p>DIA's Chief Ethics Counselor reported that the remaining 95 confidential filers did not receive the required annual ethics training by the end of 2015 due to: 1) extended deployments, 2) extended medical leave, 3) joint duty/detail assignments outside the agency and 4) pressing operational commitments. However, make-up annual ethics training was provided to these filers during the first quarter of calendar year 2016. Based on documentation provided by the Chief Ethics Counselor, OGE was able to determine that all confidential filers who did not complete annual ethics training in 2015 received the make-up training in 2016. OGE advised the Chief Ethics Counselor that make-up training conducted for confidential filers in 2016 does not count as 2016 annual training.</p> |
| Status of Recommendation: <b>Closed</b>   |

Mr. George Peirce  
Page 2

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,

A handwritten signature in black ink, appearing to be 'Dale Christopher', written in a cursive style.

Dale Christopher  
Deputy Director for Compliance