

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



February 8, 2016

Robert S. Taylor
Acting General Counsel and Designated
Agency Ethics Official
Office of the General Counsel
Department of Defense
1600 Defense Pentagon
Washington, DC 20301

Dear Mr. Taylor:

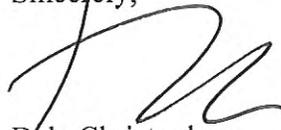
As a result of its review of the Department of Defense Office of the Secretary's (DoD OSD) ethics program, the United States Office of Government Ethics (OGE) issued one recommendation in its July 2015 review report. OGE recently conducted a follow-up review to assess whether DoD OSD has taken action sufficient to resolve the deficiencies underlying the recommendation. The results of the follow-up review are summarized below.

	Recommendation	Agency Action	Status
1	OGE recommended that the Standards of Conduct Office (SOCO) finalize and implement the more formal process for ensuring and documenting that all financial disclosure filers receive written approval before engaging in outside employment activities with a prohibited source, in accordance with the requirements of the DoD supplemental standards of conduct regulation.	SOCO is working closely with OGE to finalize proposed revisions to the DoD Supplemental Ethics Regulation, 5 CFR part 3601, including the specific requirement in 5 CFR § 3601.107 that is the subject of this recommendation. The proposed revision would eliminate the current prior written approval requirement. Pending revision of the DoD Supplemental Ethics Regulation, SOCO has taken a number of actions to help ensure compliance with the existing requirement.	Closed

		<p>Specifically, SOCO has: (1) developed a sample "Prior Approval for Outside Employment and Business Activities" form with instructions and disseminated it throughout the DoD ethics community; (2) prominently highlighted this requirement in its 2015 annual ethics training and encouraged the DoD ethics community to do the same; (3) ensured that applicable employee ethics materials , e.g., the Employee's Guide to the Standards of Conduct and the Seeking Employment Guide, highlight this requirement and encouraged the DoD ethics community to do the same in their employee ethics materials; and (4) followed up with supervisors in cases where they discovered there was no existing documentation of approval of an outside employment activity with a prohibited source.</p>	
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Thank you for your assistance during the follow-up process. We encourage you to contact your OGE Desk Officer for ethics program support.

Sincerely,



Dale Christopher
Deputy Director for Compliance