



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

June 13, 2012

Robert Gorman
Designated Agency Ethics Official
Defense Information Systems Agency
Office of the General Counsel
P.O. Box 549
Ft. Meade, MD 20755

Dear Mr. Gorman:

The United States Office of Government Ethics (OGE) has conducted a follow-up review of the ethics program at the Defense Information Systems Agency (DISA) to determine whether the improvements recommended or suggested in our October 2011 report have been achieved.

During OGE's initial review of DISA's ethics program, OGE found that DISA had difficulty notifying new employees who assumed confidential financial disclosure filing positions of their requirement to submit a new entrant confidential financial disclosure report within 30 days of assuming those positions. OGE recommended that DISA "Develop a clear and consistent process for timely identification and notification of new entrant confidential financial disclosure filers and inform each person that holds responsibility in the process of his or her duties." In response to OGE's recommendation, DISA has taken multi-step approach to identify and notify confidential financial disclosure filers of their requirement to file.

- A Recruitment Work Order (RWO) is created for every vacant position at DISA. In response to OGE's recommendation, the RWO has been updated to include a mandatory section for managers to indicate if a vacant position requires the filing of a confidential financial disclosure. Written guidance is provided to managers and Human Resources (HR) liaisons to help ensure confidential filing status determinations are accurate and not made arbitrarily.
- The RWO is forwarded to Defense Finance and Accounting Services (DFAS) personnel, who handle all DISA personnel actions including new hires, promotions and reassignments. DFAS uses the filing information in the RWO to update the list of new employees with the appropriate filing status.
- Every two weeks, DFAS will provide DISA with a list of new employees who are scheduled to report to the agency. The list identifies each new employee's confidential financial disclosure filing status. The Office of the General Counsel (OGC) will contact these employees within seven days and ask them to verify their financial disclosure filing status with their supervisor. Employees confirmed in filing positions will be entered into the Financial Disclosure Management (FDM) system and receive automated reminders to file their new entrant financial disclosure reports.

- OGC reviews a list of reassignments and promotions provided by DFAS and contacts promoted or reassigned personnel to confirm filing requirements. OGC will also remind ethics points of contact (POC) to notify the Ethics Program Office should an existing employee enter a confidential filing position.

DISA has taken appropriate action responsive to OGE's recommendation. Therefore, the recommendation is closed.

OGE's initial review also identified that initial ethics orientation (IEO) conducted at DISA's regional and field offices was not given adequate oversight. While headquarters personnel had training records reflective of completed IEO, OGC had to contact regional and field offices during the course of the initial review to verify completion of IEO. OGE recommended that DISA "Provide periodic oversight of the initial ethics orientation program at the regional and field level."

In response to OGE's recommendation, DISA identified a POC for each Directorate within DISA who is now responsible for informing new employees of the IEO requirement, monitoring and tracking completion, and submitting a monthly report to OGC. The HR training office has also included IEO as mandatory training for all new employees and sends automated email reminders to incoming employees advising them to complete the training¹. OGC also sends an IEO reminder email to new DISA employees and uses a monthly new hire spreadsheet to track completion of IEO DISA-wide. The HR training office is currently working with OGC to provide reports which can be readily cross-checked against the new employee list to further improve the IEO tracking process. DISA's updated IEO tracking procedures at the regional and field level are responsive to OGE's recommendation and, therefore, the recommendation is closed.

Based on our follow-up and as noted, we have determined that DISA has adequately implemented the recommendations in the October 2011 review report. As a result, OGE has closed the recommendations. In addition, OGE is satisfied that DISA's actions regarding the suggestions in the October 2011 report are responsive and considers those issues closed as well. Thank you for your assistance during the follow-up process. Please contact me at 202-482-9317 if you require any additional information.

Sincerely,



Rashmi Bartlett
Associate Director

¹ OGC is still working with the HR training office to ensure all new employees receive the automatic email reminders. The reminder email is sent to new employees every day until they log into the mandatory training website and complete IEO.