

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Defense Information Systems Agency (DISA)

Follow-up to OGE Report Number: 23-53I

Report No.: 25-49IF

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**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the DISA ethics program, the Office of Government Ethics (OGE) issued 11 recommendations in its September 2023 review report, which covered calendar year 2022. OGE conducted a follow-up review to assess whether DISA has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that DISA's Executive Operations Specialist promptly (no later than 15 days after appointment) notifies DISA ethics officials of all appointments to positions that require incumbents to file public financial disclosure reports.	<p>DISA provided OGE with standard operating procedures that state human resources "is responsible for providing the DAEO or designees with updated lists of all incoming and outgoing personnel on at least a bi-weekly basis." These lists also indicate whether financial disclosure filing is required by the position description.</p> <p>In addition, DISA provided an example email from human resources to ethics officials with information on an incoming public filer, which demonstrates a functioning notification system.</p>	Closed
2	Ensure that new entrant public reports are filed timely.	DISA provided OGE with copies of all new entrant public reports required to be filed during 2025. Filing timeliness improved from 0% (2023 report) to 75%.	Closed
3	Provide OGE with written procedures that govern the collection, review, and evaluation of confidential financial disclosure reports.	DISA supplied OGE with written confidential financial disclosure procedures that meet all applicable requirements. The procedures cover collection, review, and certification of confidential reports.	Closed

4	Develop, document, and implement a formal process to ensure that the DAEO is notified of all appointments to positions whose incumbents are required to file confidential financial disclosure reports within 15 days of a relevant appointment.	<p>DISA's ethics officials receive information on incoming confidential filers from two different sources. First, Human Resources provides updated lists of all incoming personnel on at least a biweekly basis.</p> <p>However, since ethics officials believe this information to be incomplete, they supplement it with information received from the supervisors of new employees. Part of the New Employee Orientation (NEO) checklist (for all new employees) requires supervisors to notify ethics officials of new confidential filers.</p>	Closed
5	Ensure that confidential financial disclosure reports are reviewed and certified within 60 days of receipt.	<p>OGE examined data from every confidential report filed at DISA during 2024. 70% of reports were reviewed timely (within 60 days of receipt) and 69% were certified timely.</p> <p>These percentages do not represent a meaningful improvement vs. DISA's 2022 filing data, where 70% of reports were reviewed timely, and 66% were certified timely.</p>	Open
6	Provide OGE with written procedures for issuing notices to prospective employees.	<p>DISA furnished OGE with written procedures for issuing notices to prospective employees in addition to templates that meet requirements contained in 5 CFR § 2638.303.</p> <p>DISA also provided a sample notice that contained all required language and content.</p>	Closed
7	Provide OGE with written procedures for issuing notices to new supervisors.	<p>DISA provided OGE with written procedures in addition to templates that meet requirements contained in 5 CFR § 2638.306.</p> <p>DISA also provided a sample notice that contained the language and content required.</p>	Closed
8	Provide OGE with written procedures that outline how DISA provides new employees with required initial ethics training.	DISA supplied OGE with written initial ethics training (IET) procedures that meet applicable requirements. The procedures cover who provides IET, the employee timeline for receiving IET, training format, and how completion is tracked.	Closed
9	Ensure that new employees complete initial ethics training within three months of appointment.	OGE examined DISA's 2024 IET completion data and found that 95% of new employees completed IET within three months, as required. This is a significant improvement over the 56% that were trained timely in 2022.	Closed

10	Provide OGE with the materials used to provide annual ethics training that meet the requirements outlined in 5 C.F.R. § 2638.304(e)(2).	<p>As part of their annual ethics training, federal agencies are required to provide employees with either the following written materials or written instruction for accessing them:</p> <p><i>The summary of the Standards of Conduct (Standards) 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></p> <p>The written materials DISA initially provided to OGE included a summary of supplemental regulations and instructions for contacting ethics officials, but did not contain a summary of the Standards. During the course of this follow-up inspection, DISA amended their annual ethics training to include a link to a summary of the Standards found on OGE's website.</p>	Closed
11	Provide OGE with documentation that demonstrates how completion of Annual Ethics Training is tracked and who received the training. The documentation should clearly indicate you track that each type of employee (public and confidential filers) receives training.	<p>DISA uses separate methods to track annual training completion depending on whether the trainee is a public or confidential financial disclosure filer.</p> <p>Public filers' completion is tracked by ethics officials using an Excel spreadsheet. Completion data for confidential filers is pulled (in Excel format) from the agency's electronic Training Management System (TMS), meaning the tracking occurs automatically as filers complete their online training.</p>	Closed

Based on the results of OGE's follow-up review, all recommendations except recommendation 5 are closed. OGE will conduct an additional follow-up review in approximately nine months to reassess whether DISA has taken sufficient action to resolve the deficiencies underlying the recommendation which remains open.