

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Office of the National Cyber Director (ONCD)

Follow-up to OGE Report Number: 23-50I

Report No.: 25-08IF

Date: 10/24/2024

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

As a result of its review of the Office of the National Cyber Director (ONCD) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its September 2023 review report. OGE conducted a follow-up review to assess whether ONCD 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 public financial disclosure reports are reviewed and certified timely.	OGE reviewed four public financial disclosure reports and found that three of the four (75%) reports were reviewed and certified timely. OGE was notified that ONCD transitioned the ADAEO to a new employee in October 2024. OGE notified the new ADAEO of the open requirement and the new ADAEO has certified the late report.	Open
2	Ensure new entrant confidential financial disclosure reports are filed timely.	OGE reviewed three new entrant confidential financial disclosure reports and found that two of the three (67%) were filed late.	Open
3	Finalize and implement a policy for initial ethics training and ensure it is reviewed annually by the DAEO.	At the time of the follow-up inspection, ONCD had drafted a policy for initial ethics training. Although the draft policy has been implemented it has not been finalized through signature of the agency head.	Open

Based on the results of OGE's follow-up review, recommendations 1, 2, and 3 will remain open. OGE will conduct an additional follow-up review in approximately 12 months to assess whether ONCD has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.