

ETHICS PROGRAM INSPECTION REPORT

Agency: National Aeronautics and Space Administration (NASA)

Report No.: 24-59I

Date: September 26, 2024

Period Covered by Review: January 1, 2023, through March 1, 2024

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

| 1.0 | AGENCY DATA | | |
|------|--|---------------------------|--|
| | EMPLOYEES | | |
| 1.1 | Number of full-time agency employees. | 18,528 | |
| 1.2 | Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed. | 4 | |
| 1.3 | Number of non-PAS public financial disclosure reports required to be filed. | 758 | |
| 1.4 | Number of confidential financial disclosure reports required to be filed. | 11395 | |
| | ETHICS PROGRAM | | |
| 1.5 | Title of Designated Agency Ethics Official (DAEO). | General Counsel | |
| 1.6 | Grade level of DAEO. | SES | |
| 1.7 | Title of Alternate DAEO (ADAEO). | Agency Counsel for Ethics | |
| 1.8 | Grade level of ADAEO. | SL | |
| 1.9 | Title of the primary, day-to-day ethics program administrator. | Agency Counsel for Ethics | |
| 1.10 | Grade level of the primary, day-to-day ethics program administrator. | SL | |
| 1.11 | Current number of full-time ethics officials. | 2 | |
| 1.12 | Current number of part-time ethics officials. | 22 | |
| 1.13 | Number of reporting levels between the DAEO and the agency head. | 1 | |
| | COMMENTS | | |
| | None. | | |

| 2.0 | LEADERSHIP | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| 2.1 | OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See</i> 5 C.F.R. § 2638.107(a). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2.2 | OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See</i> 5 C.F.R. § 2638.107(a). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | COMMENTS | | | |
| | None. | | | |

| 3.0 | PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T) | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| | The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1). | | | |
| 3.1 | • Collection of public financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3.2 | • Review/evaluation of public financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3.3 | • Public availability of public financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3.4 | The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3.5 | Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| | | | | |
|---|--|-------------------------------------|-------------------------------------|--------------------------|
| 3.6 | Public financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.603(g)(1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3.7 | There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3.8 | There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(2). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| DATA ANALYSIS | | % | | |
| 3.9 | Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b). | 48% | | |
| 3.10 | Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a). | 88% | | |
| 3.11 | Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e). | 84% | | |
| 3.12 | Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 32% | | |
| 3.13 | Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 32% | | |
| 3.14 | Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a). | 100% | | |
| 3.15 | Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e). | N/A | | |
| 3.16 | Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 75% | | |
| 3.17 | Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 75% | | |
| COMMENTS | | | | |
| <p>(3.4) There were seven late reports reviewed by OGE which met the criteria for assessing a late filing fee. Ethics officials assessed the late filing fee for three filers. However, ethics officials did not assess the late filing fee for the remaining four filers because the individuals were notified late of their responsibility to file their new entrant or termination report. Ethics officials considered the reports timely filed based on the date the filer was notified to file. However, OGE still considers these reports late based on the original due date. Nonetheless, ethics officials can waive the late fee because of the late notification to file their reports.</p> <p>(3.7) The ethics office is notified by email of new entrant public filers once the employee files the report.</p> <p>(3.9) Only 12 of the 25 new entrant reports reviewed by OGE were filed timely. The NASA Shared Services Center (NSSC) is responsible for providing notice to non-PAS new entrant filers. There has sometimes been an extended lag time between an employee's appointment date and the date an employee is notified to file a public financial disclosure report, and NASA has started the clock when the employee is notified to file. NASA OGC will work with NSSC to ensure that non-PAS new entrant filers receive proper notification and reminders to timely file such reports.</p> <p>(3.12-3.13) Only 33 of the 75 reports reviewed by OGE were certified reviewed and certified timely. Ethics officials indicated that the late certification was caused by staffing challenges in the ethics office.</p> <p>(3.15) There were no termination reports required to be filed by PAS officials in 2023.</p> <p>(3.16-3.17) There were only four annual reports required to be filed by PAS officials in 2023. One of the four reports was certified late.</p> | | | | |

4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

| COMPLIANCE REQUIREMENTS | | Yes | No | N/A |
|--|---|-------------------------------------|--------------------------|--------------------------|
| The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1). | | | | |
| 4.1 | • Collection of confidential financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.2 | • Review/evaluation of confidential financial disclosure reports. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.3 | Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

ETHICS PROGRAM INSPECTION REPORT

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| | | | | |
|------|---|-------------------------------------|-------------------------------------|--------------------------|
| 4.4 | Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.5 | The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See</i> 5 C.F.R. § 2634.905(a). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.6 | There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | DATA ANALYSIS | % | | |
| 4.7 | Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b). | 80% | | |
| 4.8 | Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a). | 84% | | |
| 4.9 | Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 94% | | |
| 4.10 | Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a). | 94% | | |
| | COMMENTS | | | |
| | (4.6) The ethics office is notified of new entrant confidential filers, including those who are newly promoted from within the agency by an email from NASA's electronic financial disclosure system once the employee files the report. | | | |

| 5.0 | NOTICES TO PROSPECTIVE EMPLOYEES | | | |
|-----------------|--|-------------------------------------|--------------------------|--------------------------|
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| | Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303. | | | |
| 5.1 | <ul style="list-style-type: none">A statement regarding the agency's commitment to government ethics. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.2 | <ul style="list-style-type: none">Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.3 | <ul style="list-style-type: none">Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.4 | <ul style="list-style-type: none">Where applicable, notice of the time frame for completing initial ethics training. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.5 | <ul style="list-style-type: none">Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.6 | The agency has established written procedures for issuing the notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.7 | The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.8 | The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| COMMENTS | | | | |
| None. | | | | |

| 6.0 | NOTICES TO NEW SUPERVISORS | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| | The agency must provide each employee upon initial appointment to a supervisory position with: <i>See</i> 5 C.F.R. § 2638.306. | | | |
| 6.1 | <ul style="list-style-type: none">Contact information for the agency's ethics office. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| | | | | |
|-----------------|---|-------------------------------------|--------------------------|-------------------------------------|
| 6.2 | <ul style="list-style-type: none">The text of 5 C.F.R. § 2638.103. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.3 | <ul style="list-style-type: none">A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.4 | <ul style="list-style-type: none">Other information the DAEO deems necessary. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6.5 | The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.6 | The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6.7 | The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See</i> 5 C.F.R. § 2638.306(b). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| COMMENTS | | | | |
| None. | | | | |

| 7.0 | INITIAL ETHICS TRAINING | | | |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| | Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See</i> 5 C.F.R. § 2638.304. | | | |
| 7.1 | The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7.2 | The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct 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>See</i> 5 C.F.R. § 2638.304(e)(2). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7.3 | The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7.4 | The agency’s written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | DATA ANALYSIS | % | | |
| 7.5 | Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304. | 100% | | |
| 7.6 | Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b). | 79% | | |
| | COMMENTS | | | |
| | None. | | | |

| | | | | |
|------------|---|-------------------------------------|--------------------------|--------------------------|
| 8.0 | ANNUAL ETHICS TRAINING | | | |
| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
| | Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. <i>See</i> 5 C.F.R. §§ 2638.307 and 2638.308. | | | |
| 8.1 | The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| | | | | |
|---------------|---|-------------------------------------|-------------------------------------|--------------------------|
| 8.2 | The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct 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>See</i> 5 C.F.R. § 2638.304(e)(2). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8.3 | The agency’s annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8.4 | The agency’s program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 8.5 | The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. <i>See</i> 5 C.F.R. § 2638.308(e)(2). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| DATA ANALYSIS | | Training Format | | |
| | | Live | Interactive | |
| | Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.308(a). | | | |
| 8.6 | <ul style="list-style-type: none">Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1). | 0% | 0% | |
| 8.7 | <ul style="list-style-type: none">Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2). | 0% | 0% | |
| 8.8 | <ul style="list-style-type: none">SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3). | See comment below | 93% | |
| | Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a)(d). | | | |
| 8.9 | <ul style="list-style-type: none">Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1). | See comment below | 99% | |
| 8.10 | <ul style="list-style-type: none">Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). | N/A | N/A | |
| 8.11 | <ul style="list-style-type: none">Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2). | N/A | N/A | |
| 8.12 | <ul style="list-style-type: none">Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3). | N/A | N/A | |
| 8.13 | <ul style="list-style-type: none">Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4). | N/A | N/A | |
| COMMENTS | | | | |
| | (8.5-8.7) According to ethics officials PAS officials did not receive annual ethics training reminder messages from NASA's EPTS system and were not included in tracking information used to monitor annual ethics training. Consequently, the three NASA PAS appointees who remain with NASA, including the NASA Administrator, did not complete annual ethics training in 2023. Upon discovery of this oversight, the NASA Administrator and the other two incumbent PAS appointees promptly scheduled and completed live ethics training for 2023 in January 2024. (8.8-8.9) OGE evaluated the ethics training records for the public and confidential filers at NASA Headquarters. According to ethics officials, NASA offers live training as well as electronic AET training via SATERN. However, the annual ethics training tracking report provided to OGE did not identify the format of the annual ethics training completed by the filers. Therefore, while the training was interactive, OGE could not independently verify which filers received live training. (8.10-8.13) The annual ethics training tracking report provided to OGE did not identify these categories of confidential filers. | | | |

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| | COMPLIANCE REQUIREMENT | Yes | No | N/A |
|-----|--|-------------------------------------|--------------------------|--------------------------|
| 9.1 | Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| | COMMENTS | | | |
| | None. | | | |

10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS**Confidential Financial Disclosure**

| | | |
|------|---|-----|
| 10.1 | Number of SGEs serving on Advisory Committees and Boards. | 195 |
| | DATA ANALYSIS | % |
| 10.2 | Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b). | 67% |
| 10.3 | Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See</i> 5 C.F.R. § 2634.605(a). | 83% |
| 10.4 | Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a). | 42% |

Ethics Training

| | COMPLIANCE REQUIREMENTS | Yes | No | N/A |
|------|--|-------------------------------------|-------------------------------------|--------------------------|
| | Required ethics training must be provided to each SGE. <i>See</i> 5 C.F.R. §§ 2638.304 and 2638.307. | | | |
| 10.5 | The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 10.6 | The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct 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>See</i> 5 C.F.R. § 2638.304(e)(2). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| | DATA ANALYSIS | | | % |
| 10.7 | Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304. | | | N/A |
| 10.8 | Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2). | | | N/A |
| 10.9 | Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2). | | | 92% |
| | COMMENTS | | | |
| | (10.2-10.3) OGE reviewed the reports filed by members of the Science Committee and the STEM Engagement Committees. Four of the 12 reports reviewed by OGE were filed late. (10.4) Only five of 12 reports reviewed by OGE were certified within 60 days: (10.6) OGE did not find evidence that the SGEs received written materials or instructions for accessing the materials required to be provided as part of Annual Ethics Training. | | | |

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RECOMMENDATIONS

| # | Element | RECOMMENDATION | Compliance Due |
|---|----------------|---|-----------------|
| 1 | 3.7 | <p><u>RECOMMENDATION:</u> Ensure that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports.</p> <p><u>AGENCY RESPONSE:</u> NASA OGC will work with the NASA Shared Services Center (NSSC) to ensure proper notification (no later than 15 days) is provided for timely issuance of public financial disclosure reports to appointees in all positions requiring incumbents to file public financial disclosure reports.</p> | January 2, 2026 |
| 2 | 3.9 | <p><u>RECOMMENDATION:</u> Ensure that new entrant public reports are filed timely.</p> <p><u>AGENCY RESPONSE:</u> The NASA Shared Services Center (NSSC) is responsible for providing notice to non-PAS new entrant filers. There has sometimes been an extended lag time between an employee's appointment date and the date an employee is notified to file a public financial disclosure report, and NASA has started the clock when the employee is notified to file. NASA OGC will work with NSSC to ensure that non-PAS new entrant filers receive proper notification and reminders to timely file such reports.</p> | January 2, 2026 |
| 3 | 3.12 & 3.13 | <p><u>RECOMMENDATION:</u> Ensure that public reports are reviewed and certified timely.</p> <p><u>AGENCY RESPONSE:</u> Timeliness of review in this sample was heavily implicated by staff shortage at NASA OGC's Headquarters office which NASA OGC will communicate to remediate through the agency's resource planning processes.</p> | January 2, 2026 |
| 4 | 4.6 | <p><u>RECOMMENDATION:</u> Ensure that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports.</p> <p><u>AGENCY RESPONSE:</u> NASA OGC will work with the NASA Shared Services Center (NSSC) to ensure proper notification is provided for timely issuance of confidential financial disclosure reports to appointees in all positions requiring incumbents to file confidential financial disclosure reports.</p> | January 2, 2026 |
| 5 | 7.6 | <p><u>RECOMMENDATION:</u> Track completion of IET to ensure new employees receive it timely.</p> <p><u>AGENCY RESPONSE:</u> The NASA Shared Services Center (NSSC) is responsible for tracking completion of initial ethics training. NSSC notifies all new employees via email of the requirement to take initial ethics training. Initial ethics training is also placed in the learning plans of all new employees. New employees may take the training live with an ethics official or electronically via SATERN. New employees receive reminders from SATERN until initial ethics training is completed. NSSC tracks completion for both trainings. NASA will take further action to ensure that new employees take live or electronic training within 90 days of their appointment.</p> | January 2, 2026 |
| 6 | 8.5, 8.6 & 8.7 | <p><u>RECOMMENDATION:</u> Ensure that covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years.</p> <p><u>AGENCY RESPONSE:</u> NASA has one employee at Level II of the Executive Schedule. This employee received live training in 2021 and 2022, and additionally in January 2024 for 2023 due to the tracking oversight noted in OGE's comments to lines 8.6-8.7.</p> | January 2, 2026 |

ETHICS PROGRAM INSPECTION REPORT

Agency: National Aeronautics and Space Administration (NASA)

Report No.: 24-59I

Date: September 26, 2024

Period Covered by Review: January 1, 2023, through March 1, 2024

UNITED STATES OFFICE OF GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

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| 7 | 10.2 | <p><u>RECOMMENDATION:</u> Ensure that the confidential reports filed by members of the Science Committee and the STEM Engagement Committees are filed timely.</p> <p><u>AGENCY RESPONSE:</u> NASA's federal advisory committee management experienced staffing challenges during the inspection period. A new NASA Committee Management Officer (CMO) has been appointed with whom NASA OGC will work with to ensure Special Government Employees reports are filed timely.</p> | January 2, 2026 |
| 8 | 10.4 | <p><u>RECOMMENDATION:</u> Ensure that the reports filed by SGEs are certified within 60 days of receipt but not later than the SGE's first meeting.</p> <p><u>AGENCY RESPONSE:</u> Timeliness of review in this sample was heavily implicated by staff shortage at NASA OGC's Headquarters office which NASA OGC will communicate to remediate through the agency's resource planning processes, in addition to issues before the appointment of a new NASA Committee Management Officer with whom NASA OGC is working to improve procedures.</p> | January 2, 2026 |
| 9 | 10.6 | <p><u>RECOMMENDATION:</u> Ensure that during annual ethics training SGEs are provided with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct 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.</p> <p><u>AGENCY RESPONSE:</u> NASA will ensure that Special Government Employees receive written materials or access to written materials concerning the ethics regulations, statues, and NASA Supplemental Regulations.</p> | January 2, 2026 |

GENERAL AGENCY COMMENTS

None.