

ETHICS PROGRAM INSPECTION REPORT

Agency: National Security Agency

Report No.: 26-57I

Date: September 29, 2026

Period Covered by Review: January 1, 2025 through December 31, 2025

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.	24,803
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See Comment Below
1.3	Number of non-PAS public financial disclosure reports required to be filed.	Classified Information
1.4	Number of confidential financial disclosure reports required to be filed.	Classified Information
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	See Comment Below
1.6	Grade level of DAEO.	See Comment Below
1.7	Title of Alternate DAEO (ADAEO).	Deputy Associate General Counsel
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Assistant General Counsel for Ethics
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-15
1.11	Current number of full-time ethics officials.	6
1.12	Current number of part-time ethics officials.	23
1.13	Number of reporting levels between the DAEO and the agency head.	2
	COMMENTS	
	(1.2) NSA has two PAS positions, the NSA Director and the Inspector General. The NSA Director serves in a dual-hatted capacity as the Commander of the U.S. Cyber Command and the Director of NSA/Chief of the Central Security Service (CSS). At the time of OGE’s inspection, the NSA Inspector General position was vacant. (1.3 and 1.4) This information is classified. Exact numbers were obtained by OGE during its onsite review and used to determine compliance with applicable requirements. (1.5 – 1.6) During the inspection, the DAEO position was found vacant.	

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).	☐	☐	☒
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).	☒	☐	☐
	COMMENTS			
	(2.1) As previously mentioned at 1.5, the DAEO position was vacant at the time of inspection. OGE notes that once an employee is appointed to fulfill the duties of the DAEO—either permanently or temporarily—the agency must complete the OGE Form 241A, Notification of Designation of Designated Agency Ethics Official, and submit to OGE.			

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GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

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. § 13122(d)(1)			
3.1	• Collection of public financial disclosure reports.	☒	☐	☐
3.2	• Review/evaluation of public financial disclosure reports.	☒	☐	☐
3.3	• Public availability of public financial disclosure reports.	☒	☐	☐
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. <i>See</i> 5 C.F.R. § 2634.704	☐	☐	☒
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	☒	☐	☐
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).	☒	☐	☐
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).	☒	☐	☐
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).	☒	☐	☐
	DATA ANALYSIS	%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	96%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%		
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).	100%		
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).	95%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	See Comment Below		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	See Comment Below		
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).	See Comment Below		
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).	See Comment Below		
	COMMENTS			
	(3.1 -3.3) NSA's public financial disclosure system is managed in accordance with the financial disclosure procedures outlined in Chapter 7 of the Department of Defense (DoD) Joint Ethics Regulation (JER). These procedures meet the regulatory requirements that agencies must have documented processes for managing financial disclosure systems. In addition to the JER, OGE found ethics officials to have also developed more specific written procedures for administering NSA's public financial disclosure system, which OGE considers to be a model agency practice. (3.4) NSA did not have any public financial disclosure filers who were subject to the late filing fee or who required a waiver of the fee during the period covered by this inspection.			

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UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

(3.14 -3.17) OGE did not examine any PAS reports as part of this inspection. OGE was advised that the Director files his public report with the US Cyber Command rather than with NSA. As also noted during OGE's 2023 inspection of NSA's ethics program, the NSA Inspector General position remained vacant at the time of OGE's current inspection.

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. § 13122(d)(1)			
4.1	• Collection of confidential financial disclosure reports.	☒	☐	☐
4.2	• Review/evaluation of confidential financial disclosure reports.	☒	☐	☐
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	☒	☐	☐
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	☒	☐	☐
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.	☐	☐	☒
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).	☒	☐	☐
	DATA ANALYSIS	%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	88%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	92%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
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).	86%		
	COMMENTS			
	(4.1 – 4.2) NSA's confidential financial disclosure system is also managed in accordance with the financial disclosure procedures outlined in Chapter 7 of the DoD JER. These procedures meet the regulatory requirements that agencies must have documented processes for managing financial disclosure systems. As with the public system, the OGE reviewer found that, in addition to the JER, ethics officials had established additional, more specific written procedures for administering NSA's confidential financial disclosure system. (4.4) As with the public system, an independent evaluation of the FDRS e-filing confidential system was not performed due to the OGE reviewer's security classification level. The sample of confidential reports used to assess the findings mentioned above was chosen from the agency's master list onsite, and the agency printed the reports that the OGE reviewer examined. (4.5) NSA does not have an OGE-approved alternative confidential financial disclosure system.			

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Report No.: 26-57I

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

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	• A statement regarding the agency's commitment to government ethics.				☒	☐	☐
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.				☒	☐	☐
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.				☒	☐	☐
5.4	• Where applicable, notice of the time frame for completing initial ethics training.				☒	☐	☐
5.5	• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.				☒	☐	☐
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).				☒	☐	☐
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).				☒	☐	☐
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.				☒	☐	☐
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	• Contact information for the agency's ethics office.				☒	☐	☐
6.2	• The text of 5 C.F.R. § 2638.103.				☒	☐	☐
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.				☒	☐	☐
6.4	• Other information the DAEO deems necessary.				☐	☐	☒
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).				☒	☐	☐
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).				☒	☐	☐
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).				☒	☐	☐
COMMENTS							
None.							

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**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch**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 5 C.F.R. § 2638.304.</i>			
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	☒	☐	☐
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 5 C.F.R. § 2638.304(e)(2).</i>	☒	☐	☐
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
	DATA ANALYSIS	%		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	98%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	98%		
	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 5 C.F.R. §§ 2638.307 and 2638.308.</i>			
8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	☒	☐	☐
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 5 C.F.R. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).</i>	☒	☐	☐
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>	☒	☐	☐
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 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>	☒	☐	☐
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 5 C.F.R. § 2638.308(e)(2).</i>	☒	☐	☐
	DATA ANALYSIS	Training Format		
		Live	Interactive	
	Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.308(a).</i>			

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

8.6	• Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	100%
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	N/A	100%
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).			
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	N/A	99%
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.11	• 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	• 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	• 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			
(8.6, 8.10, 8.11, 8.13) NSA does not have employees in these categories.			
(8.12) These employees are included at 8.9.			

9.0 ETHICS ADVICE AND COUNSELING				
	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).	☒	☐	☐
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.			Classified Information		
	DATA ANALYSIS			%		
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).			See Comment Below		
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).			See Comment Below		
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).			See Comment Below		
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).			☐	☐	☒

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UNITED STATES OFFICE OF GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

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).	☐	☐	☒
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	See Comment Below		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	See Comment Below		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	See Comment Below		
	COMMENTS			
	(10.1 – 10.4) This information is classified. Exact numbers were obtained by OGE during its onsite review and used to determine compliance with applicable requirements. OGE notes that the NSA Board and Panels disbanded in 2025. OGE did not examine any SGE reports due to the level of classification of the OGE reviewer. Member list was classified.			