

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Department of the Navy Headquarters

Follow-up to OGE Report Number: 24-37I

Report No.: 25-56IF

Date: May 8, 2025

UNITED STATES OFFICE OF
GOVERNMENT ETHICSPreventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Department of the Navy Headquarters (DON) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its May 2024 review report. OGE conducted a follow-up review to assess whether the DON 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 DON's human resources department notifies the DAEO of appointments to and terminations from public filing positions no later than 15 days after the employee's appointment or termination date.	The Assistant General Counsel, Ethics (AGC(E)) is the principal assistant to the DAEO on ethics and standards of conduct matters and is responsible for the day-to-day management of the DON ethics program. DON's human resources department now notifies the AGC(E) of appointments and terminations every 14 days, one day earlier than required.	Closed
2	Ensure that new entrant public financial disclosure reports are filed timely.	OGE examined data for all new entrant public reports filed in 2024. Filing timeliness improved from 56% (May 2024 report) to 90%.	Closed
3	Include written instructions for contacting agency ethics officials as part of new employee initial ethics training.	DON amended their interactive online training to include written instructions for contacting agency ethics officials. New employees are twice provided with the written email address used to contact ethics officials (in hyperlink format).	Closed

4	Ensure that all BoV MCU financial disclosure reports are collected, reviewed, and certified timely.	<p>The previous DON inspection found that the Board of Visitors, Marine Corps University (BoV MCU) Advisory Committee was only able to provide 3 out of 10 financial disclosure reports required to be filed in 2023.</p> <p>To evaluate compliance with this recommendation, OGE inspected all BoV MCU reports required to be filed during 2024. OGE found that:</p> <ul style="list-style-type: none"> • 100% were filed/collected timely • 90% were reviewed timely • 90% were certified timely 	Closed
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Based on the results of OGE's follow-up review, all recommendations are closed.