

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Defense Finance and Accounting Service

Follow-up to OGE Report Number: 24-13I

Report No.: 25-82IF

Date: 8/22/2025

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

As a result of its review of the U.S. Defense Finance and Accounting Service (DFAS) ethics program, the Office of Government Ethics (OGE) issued two recommendations in its November 2023 review report. OGE conducted a follow-up review to assess whether the DFAS 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 | Establish procedures to ensure that HR promptly (no later than 15 days after termination) notifies the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. | DFAS indicated that an official agency policy could not be issued because of staffing limitations. However, DFAS provided OGE with documentation which codifies an agreement between ethics and HR staff. The agreement includes the required notice provisions. | Closed |
| 2 | Establish procedures to ensure that HR 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 in order to ensure the timely filing of new entrant reports. | | Closed |

Based on the results of OGE's follow-up review, all recommendations are closed.