

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: National Security Agency

Follow-up to OGE Report Number: 23-54I and 25-11IF

Report No.: 25-66IF

Date: June 27, 2025

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

The Office of Government Ethics (OGE) completed its inspection of the National Security Agency's (NSA) ethics program in September 2023. As a result of its review, OGE issued eight recommendations for improvement. OGE conducted a follow-up review in September 2024 but was only able to close six of the eight recommendations at that time. OGE conducted a second follow-up review in June 2025 to assess whether NSA had taken sufficient action to resolve the deficiencies underlying these recommendations. The results of OGE's second follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
7	Ensure that all SGE members indicate their reporting status on the first page of the confidential report as New Entrant each year.	In September 2023, OGE found that most of the SGE reports examined did not indicate the reporting status as "New Entrant," as required by 5 C.F.R. § 2634.903(b).  During this second follow-up review, OGE examined all confidential reports filed by SGEs by April 2025, who were serving on the NSA advisory board. All of these reports correctly indicated the reporting status as "New Entrant."	Closed
8	Ensure that all SGE confidential financial disclosure reports are certified within 60 days of receipt.	As noted above, OGE examined all confidential reports filed by SGEs by April 2025 who were serving on the NSA advisory board. Of the reports OGE examined, all were certified within 60 days of receipt.	Closed

Based on the results of OGE's second follow-up review, all recommendations in OGE's 2023 Inspection report are now closed.