

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**



March 19, 2019

Anne Brennan  
Acting Designated Agency Ethics Official  
Department of the Navy  
1000 Navy Pentagon  
Room 4E782  
Washington, DC 20350-1000

Dear Ms. Brennan:

As a result of its review of the U.S. Department of the Navy HQ (Navy) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its September 2017 review report. OGE conducted a follow-up review to assess whether the Navy has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

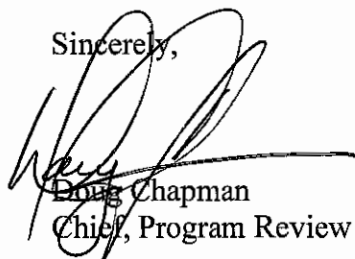
	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that public financial disclosure reports are certified timely.	OGE examined a sample of public financial disclosure reports during its initial review and found that 69% of the reports examined were certified timely. OGE reviewed a new sample of new entrant, annual and termination public financial disclosure reports during its follow-up review and found that 88% of the reports were certified timely.	Closed
2	Ensure that new entrant confidential financial disclosure reports are filed timely.	OGE examined a sample of new entrant confidential financial disclosure reports during its initial review and found that 44% were filed timely. OGE reviewed a new sample of new entrant confidential reports during its follow-up review and found 97% of the reports were filed timely.	Closed



3	Ensure the collection, review and certification of new entrant confidential financial disclosure reports of the three members that joined the Secretary of the Navy's Advisory Panel (SNAP) after the annual ethics training brief in March of 2016 and ensure going forward the Senior Ethics Counsel is notified when new SNAP members join the Panel.	Office of the Assistant General Counsel, Ethics (OAGC(E)) reviewed and certified the three outstanding new entrant confidential financial disclosure reports of SNAP members from 2016. In 2017, SNAP new entrant confidential financial disclosure reports were collected, reviewed, and certified timely. Of the new entrant reports, 100% were filed timely and 91% were reviewed and certified timely.	Closed
4	Ensure the three new members of the Secretary of the Navy's Advisory Panel received new entrant and annual ethics training since March of 2016.	The OAGC (E) provided ethics training to all committee members, including new members, at the May 18, 2017, meeting. SNAP received annual training on July 12, 2018.	Closed

I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9223.

Sincerely,



Doug Chapman  
Chief, Program Review Branch