

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



October 14, 2015

George Peirce
General Counsel and Designated
Agency Ethics Official
Defense Intelligence Agency
Pentagon Office 2D614
200 MacDill Boulevard, Building 6000
Washington, DC 20340-5100

Dear Mr. Peirce:

As a result of its review of the Defense Intelligence Agency's (DIA) ethics program, the United States Office of Government Ethics (OGE) issued three recommendations in its February 2015 ethics program review report. In August 2015, OGE conducted a follow-up review to assess the implementation of the recommendations. Based on the follow-up review, OGE has determined that two of the three recommendations have been implemented. The results of the follow-up review are summarized below.

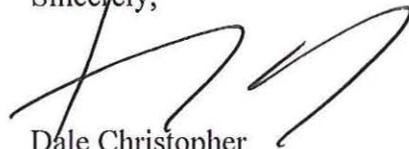
	Recommendation	Agency Action	Status
1	Ensure that all confidential financial disclosure filers submit their reports timely.	OGE examined the dates of submission on 315 new entrant and annual confidential financial disclosure reports that were required to be filed in 2015. OGE verified that these reports were filed in a timely manner.	Closed
2	Ensure that all covered employees receive annual ethics training in 2015.	At the time of OGE's follow-up review, annual training for 2015 had not yet started. According to DIA ethics officials, multiple opportunities to receive training will be offered to DIA employees from October through December 2015.	Open

Report No. 16-02F

3	Establish procedures which identify the office responsible for notifying OGE of all criminal conflict of interest referrals and other required follow-up information using the OGE Form 202, Notification of Conflict of Interest Referral.	<p>In coordination with the DIA Counsel to the Inspector General (IG Counsel), DIA has modified its internal procedures for notifying OGE of all criminal conflict-of interest-referrals and other required follow-up information.</p> <p>During the follow-up review OGE met with the IG Counsel. OGE was informed that the IG Counsel will coordinate with and notify the DIA Ethics Office of all criminal conflict-of-interest referrals and follow-up information. The Ethics Office will now be responsible for completing and submitting the requisite OGE Form-202 to OGE.</p>	Closed
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Thank you for your assistance during the follow-up process. OGE will conduct a second follow-up in January 2016 to determine whether the third recommendation can be closed. We encourage you to contact your OGE Desk Officer for any future ethics program support.

Sincerely,



Dale Christopher
Deputy Director for Compliance