



May 30, 2018

Courtney Simmons Elwood
Designated Agency Ethics Official
Central Intelligence Agency
Washington, DC 20505

Dear Ms. Elwood:

As a result of its review of the Central Intelligence Agency's (CIA) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its November 2017 inspection report. OGE recently conducted a follow-up review to assess whether CIA has taken sufficient action to resolve the deficiencies underlying the recommendation. The results of our follow-up review are summarized below.

Recommendation
Ensure that new entrant confidential financial disclosure reports are filed timely.
Agency Action and OGE Finding
<p>The CIA Ethics Office has taken steps to resolve difficulties in identifying employees who are assigned to serve as Contracting Officer's Technical Representatives (COTR) throughout the year. The assignment of COTR duties requires an employee to file a new entrant confidential financial disclosure report.</p> <p>The Ethics Office now requires all employees in grades GS-15 and below who hold a COTR certification to file a confidential report, regardless of whether they have been assigned to serve as a COTR. The Ethics Office has also revised the definitions of new entrant and annual filer within written procedures regarding COTRs to better explain the filing deadline. The Ethics Office has also revised questions within CIA source selection material to better describe who should file a new entrant confidential report. Additionally, as part of the COTR certification process, the Ethics Office has worked to educate Contracting Officers and newly certified COTRs regarding the 30-day reporting requirement and the need to immediately notify the Ethics Office when new COTR duties are assigned.</p> <p>During the follow-up review, OGE examined a sample of 30 new entrant confidential reports filed with the Ethics Office in 2017 and 2018. Of the 30 new entrant reports examined, 23 (77%) were filed timely. This represents a vast improvement from our November 2017 inspection findings when OGE identified that only 46% of the sampled confidential new entrant reports examined were filed timely.</p>



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Ensuring timeliness of new entrant confidential filing is important not only because of the relevant regulatory requirements, but also because it helps ethics officials to more quickly identify and resolve conflicts of interest. In view of the steps taken by the Ethics Office since our November 2017 inspection and the resulting improvement in the timely filing of new entrant reports, OGE believes the Ethics Office is making significant progress in resolving the deficiencies underlying our recommendation. Based on the results of this follow-up review, the recommendation is closed.

OGE encourages the Ethics Office to continue to monitor this issue to help ensure that new entrants are identified timely and, once identified, file their new entrant reports timely.

Status of Recommendation: **Closed**

I appreciate the courtesies extended to the OGE program inspection staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance

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