



June 11, 2018

Thomas A. Monheim
Designated Agency Ethics Official
National Geospatial-Intelligence Agency
7500 GEOINT Drive
Springfield, VA 22150-7500

Dear Mr. Monheim:

As a result of its review of the National Geospatial-Intelligence Agency (NGA) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its October 2017 inspection report. OGE recently conducted a follow-up review to determine whether NGA has taken sufficient action to resolve the deficiencies underlying the recommendations. Based on the results of our follow-up review, OGE has determined that two of the four recommendations will remain open. The results of our follow-up review are summarized below.

	Recommendation	OGE Finding and Agency Action	Status
1	Ensure that new entrant public reports are filed timely.	During the follow-up review, OGE examined 17 new entrant public financial disclosure reports that were filed by NGA employees who entered their positions during the period of November 2016 through December 2017. Of the 17 reports examined, 15 were filed late. OGE notes that most of NGA's difficulty in identifying new entrant public filers arises when employees are hired internally for public filing positions but are not officially placed into those positions until a later date.	Open
2	Ensure that new entrant confidential reports are filed timely.	During the follow-up review, OGE examined a sample of 24 new entrant confidential financial disclosure reports that were filed in 2017. Of the 24 reports examined, all were filed late.	Open

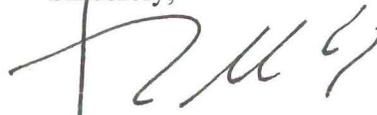
Report No. 18-36IF



3	Ensure that confidential reports are certified timely.	During the follow-up review, OGE examined a total of 49 confidential financial disclosure reports filed in 2017. Of the 49 reports examined, 44 (90%) were certified timely. This represents a significant improvement from our October 2017 inspection finding-- OGE identified that only 73% of the sampled confidential reports examined were certified timely.	Closed
4	Ensure annual ethics training fully meets the applicable content requirements.	OGE found NGA's annual ethics training material for 2017 to meet applicable content requirements.	Closed

OGE will conduct a second follow-up in October 2018 to assess whether the remaining recommendations can be closed. I appreciate the courtesies extended to the OGE program review staff. If you would like to discuss the report, please contact me at 202-482-9224.

Sincerely,



Dale Christopher
Deputy Director for Compliance