



January 23, 2018

Honorable James E. McPherson
General Counsel and
Designated Agency Ethics Official
Department of the Army
104 Army Pentagon, Rm 2E724
Washington D.C. 20310

Dear Mr. McPherson:

As a result of its review of the Department of the Army (Army) Headquarters ethics program, the Office of Government Ethics (OGE) issued two recommendations in its May 2017 review report. OGE recently conducted a follow-up review to determine whether the Army has taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Findings	Status
1	Establish alternate reviewers to ensure the timely certification of Army Staff public financial disclosure reports.	<p>In February 2017 the Acting Secretary of the Army signed a memorandum emphasizing the importance of timely filing and review of financial disclosure reports.</p> <p>OGE's review of a sample of Army Staff public new entrant, annual and termination reports filed between May 2017 and November 2017 indicated that certification timeliness improved from 73% to 100%.</p>	Closed



2	Army Secretariat monitor the updated standard operating procedures, as well as any other process changes, to ensure that they result in the improved filing timeliness of new entrant confidential reports.	In September 2017 the Acting Assistant Secretary of the Army for Manpower and Reserve Affairs and the Acting General Counsel signed a joint memorandum requiring prompt notification by human resources officials to ethics officials of all appointments to positions that require the employee to file a public or confidential financial disclosure report. OGE's review of a sample of confidential new entrant reports filed by Army Secretariat employees who entered their positions during the period September 2017 through November 2017 indicates that filing timeliness improved from 70% to 100%.	Closed
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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