

DoD Standards of Conduct Office

Program Assist Visit

SOCO Program Assist Visit Questionnaire

The purpose of SOCO's Program Assist Visit (PAV) is to assess whether DDAEO organizations are administering the ethics program effectively and in accordance with relevant requirements, as well as to identify and share best practices across the Department. The final report is provided to the head of the command or agency being visited, and to the DoD General Counsel as the DAEO. The PAV is an opportunity for DDAEOs to share successes, as well as challenges that SOCO may be able to assist with by, for example, noting a need for additional personnel resources. The DDAEO organization's ethics officials should use this request as an opportunity to objectively review and evaluate their own programs, gather comprehensive information about those programs, and identify areas where the organization is excelling and where the organization needs improvement or assistance. Providing this information in a timely manner ahead of the scheduled visit reduces the disruption of having SOCO staff onsite for an extended period and allows for meaningful discussion during the visit.

Materials Required Prior to Ethics Program Assist Visit

Agency Data	Agency Response
Current number of full-time employees:	
Name of DDAEO:	
Title of DDAEO:	
Grade/Rank of DDAEO:	
Name of the primary Ethics Program Manager (PM):	
Grade/Rank of the Ethics PM:	
Current number of full-time ethics officials:	
Current number of part-time ethics officials:	
Percentage of time Ethics PM spends on ethics program:	
Number of part-time ethics officials:	
Number of paralegals/admin staff supporting the ethics program:	
Percentage of time paralegals/admin staff spend on ethics program:	

Contact Information	
PRIMARY POINT OF CONTACT FOR SOCO PROGRAM ASSIST VISIT	
Is the DDAEO the primary POC? Yes <input type="checkbox"/> No <input type="checkbox"/>	
[Name]	
[Title]	
[Phone]	
[E-mail]	
Agency Head/Commander	
[Name]	
[Title]	
[E-mail]	
DDAEO (if other than Primary POC above)	
[Name]	
[Title]	
[Phone]	
[E-mail]	
<p>Contact List: The below SOCO SharePoint site contains information for DoD DAAEO & OSD DDAEO personnel to access and share with subordinate ethics offices, including an ethics POC list. You should review the site and POC list periodically to ensure it is up to date. https://dodgc.sp.pentagon.mil/SOCO/DDAEO If we have your correct e-mail, we have given you access to the site. If not, you can request access from osd.soco@mail.mil Subject: SOCO Sharepoint Access.</p>	
Contact data for our organization has been reviewed and is currently up to date: Yes <input type="checkbox"/> No <input type="checkbox"/>	

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Program Administration	
1	How does your agency ensure that ethics-related requirements are met within regions, components, or offices that have been delegated authority to administer elements of the ethics program? For example, if a subordinate ethics office reviews OGE 450s, how do you ensure that the reports are timely collected and reviewed and certified?
Agency Response:	
2	If your agency has Federal Advisory Committee Act (FACA) boards, please indicate whether the Designated Federal Official (DFO) works with the ethics office to ensure timely completion of FACA member ethics requirements each year.
Agency Response:	
3	If your agency or command includes members of the Reserve Component (or Space Force equivalent), please indicate how the agency or command screens them to ensure they are not assigned duties that would conflict with their civilian employment or other financial interests.
Agency Response:	
4	Have there been any recent changes within the organization that significantly affected the ethics program or are there any such changes anticipated? For example, has there been a significant change in the structure of the ethics program or the number of personnel supporting the ethics program?
Agency Response:	
5	Please note any challenges or problems facing your ethics program (e.g., staffing shortages, technology failures, reorganizations) that you are aware of. Include any actions you've taken to address them.
Agency Response:	

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6	Please note any significant ethics program deficiencies (e.g., a significant percentage of covered employees didn't receive required annual ethics training, inability to timely identify new financial disclosure filers, etc.) that you are aware of. Include any actions you've taken to address them.
Agency Response:	
7	<p>Please describe the support provided by the head of your command or agency. Please note:</p> <ul style="list-style-type: none"> • How often the DDAEO meets with leadership to discuss the ethics program, outside of required annual training; • Whether leadership regularly included discussions of ethics and ethical decision-making in staff meetings, all hands, or other venues; and • Whether leadership has published a formal statement on ethics and ethical conduct (e.g. "an ethics message).
Agency Response:	

Item	Public Financial Disclosure
8	Human resources officials must promptly notify the DDAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1). Human resources officials are also required to notify the DDAEO of the termination of employees in public financial disclosure filing positions. <i>See</i> 5 C.F.R. § 2638.105(a)(2). Please provide a narrative explanation to document how these requirements are met. If the processes for meeting these requirements are provided as part of the agency's response to SOCO's request for materials (e.g., in a memorandum of understanding), just state "See materials."
Agency Response:	
9	Please provide a brief narrative statement explaining the general processes your agency uses to conduct a conflict-of-interest analysis of public financial disclosure reports. (E.g., whether there is an intermediate reviewer, if you use contractor or prohibited holdings lists, etc.) <i>See</i> 5 C.F.R. § 2634.605. If the SOPs submitted with your materials clearly set forth this information in detail, just state "See materials."
Agency Response:	

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10	<p>Please provide the number of new entrant public financial disclosure reports: (a) Required to be filed; (b) Filed timely; and (c) Certified within 60 days of receipt.</p> <p>For PAVs scheduled to occur <i>prior to June 30th</i>, provide the requested information for the previous calendar year. For PAVs scheduled to occur <i>after June 30th</i>, provide the requested information for the current calendar year through the date of the PAV.</p>
<p>Agency Response:</p>	
11	<p>Please provide the number of annual entrant public financial disclosure reports: (a) Required to be filed; (b) Filed timely; and (c) Certified within 60 days of receipt.</p> <p>For PAVs scheduled to occur <i>prior to June 30th</i>, provide the requested information for the previous calendar year. For PAVs scheduled to occur <i>after June 30th</i>, provide the requested information for the current calendar year through the date of the PAV.</p>
<p>Agency Response:</p>	
12	<p>Please provide the number of termination public financial disclosure reports: (a) Required to be filed; (b) Filed timely; and (c) Certified within 60 days of receipt.</p> <p>For PAVs scheduled to occur <i>prior to June 30th</i>, provide the requested information for the previous calendar year. For PAVs scheduled to occur <i>after June 30th</i>, provide the requested information for the current calendar year through the date of the PAV.</p>
<p>Agency Response:</p>	
13	<p>Is the DDAEO receiving regular (at least monthly) updates from ethics program staff with OGE 278 Filing and Review compliance data? How often does your organization utilize the management report features in Integrity?</p>
<p>Agency Response:</p>	

Confidential Financial Disclosure	
14	Human resources officials are required to promptly notify the DDAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1). Please provide a narrative explanation to document how these requirements are met. If the processes for meeting these requirements are provided as part of the agency’s response to SOCO’s request for materials (e.g., in a memorandum of understanding), just state “See materials.”
Agency Response:	
14	Please provide a brief narrative statement explaining the general processes your agency uses to conduct a conflict-of-interest analysis of confidential financial disclosure reports. (E.g., whether there is an intermediate reviewer, if you use contractor or prohibited holdings lists, etc.) <i>See</i> 5 C.F.R. § 2634.605. If the SOPs submitted with your materials clearly set forth this information in detail, just state “See materials.”
Agency Response:	
15	<p>Please provide the number of new entrant confidential financial disclosure reports:</p> <ul style="list-style-type: none"> (a) Required to be filed; (b) Filed timely; and (c) Certified within 60 days of receipt. <p>For PAVs scheduled to occur <i>prior to June 30th</i>, provide the requested information for the previous calendar year. For PAVs scheduled to occur <i>after June 30th</i>, provide the requested information for the current calendar year through the date of the PAV.</p>
Agency Response:	
16	<p>Please provide the number of annual confidential financial disclosure reports:</p> <ul style="list-style-type: none"> (a) Required to be filed; (b) Filed timely; and (c) Certified within 60 days of receipt. <p>For PAVs scheduled to occur <i>prior to June 30th</i>, provide the requested information for the previous calendar year. For PAVs scheduled to occur <i>after June 30th</i>, provide the requested information for the current calendar year through the date of the PAV.</p>
Agency Response:	
17	Is the DDAEO receiving regular (at least monthly) updates from ethics program staff with OGE 450 Filing and Review compliance data? How often does your organization utilize the management report features in FDM?

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Agency Response:

Item	Education and Training
18	For the previous calendar year, please provide: (a) The number of new employees who were required to receive initial ethics training (IET); (b) The number of those required to receive IET who received it within three months of appointment; and (c) An explanation of any delinquencies.
Agency Response:	
19	How has your agency implemented leader led, values based annual ethics training? If your agency has not yet implemented leader led, values based annual ethics training, please explain why.
Agency Response:	
20	For the previous calendar year, please provide: (a) The number of public filers required to receive annual ethics training before the end of the calendar year; (b) The number of public filers who completed annual ethics training before the end of the calendar year; and (c) An explanation of any delinquencies.
Agency Response:	
21	For the previous calendar year, please provide: (a) The number of confidential filers required to receive annual ethics training before the end of the calendar year; (b) The number of confidential filers who completed annual ethics training before the end of the calendar year; and (c) An explanation of any delinquencies.
Agency Response:	

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22	Is the DDAEO receiving regular (at least monthly) updates from ethics program staff with IET and AET compliance data?
Agency Response:	

Additional Information	
23	If there is anything that you would like SOCO to know about your ethics program that is not addressed in this questionnaire or SOCO's request for materials, please provide that information either here or as an attachment to the materials you provide to SOCO in preparation for the Program Assist Visit.
Agency Response:	

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SOCO Program Assist Visit Request for Materials

Unless otherwise indicated, the request for materials below covers the **previous calendar year**, **EXCEPT** that **financial disclosure data** will vary based upon the timing of the PAV as follows:

- For PAVs scheduled to occur *prior* to June 30th, financial disclosure materials cover the previous calendar year
- For PAVs scheduled to occur *after* June 30th, financial disclosure materials cover the current calendar year through the date of the PAV.

Responsive documents should be placed in a virtual “binder” with a separate “tab” or “folder” for each lettered section and subfolders for each numbered item (e.g., A1., A2., etc.). Use the outline below to create a Table of Contents for your final submission. This request for materials document should also be used to indicate any negative responses where no materials are available or an item is not applicable to your agency/command.

Please limit your submission to the information requested below. Do not provide additional information unless requested by SOCO. SOCO may also review data from the DDAEO’s most recent Agency Ethics Program Questionnaire.

A. Program Administration

1. Current agency organizational chart which indicates the placement of the legal office and ethics office, as well as the composition of the ethics office.
2. Command or Agency mission statement.
3. Copies of any ethics messaging from the past year and this year, to include any ethics message from senior leaders.
4. Listing of:
 - a. Ethics officials (full-time and part-time) and their positions. Please note if any ethics officials have limited ethics responsibilities (i.e. only financial disclosure, only advice and counsel and training).
 - b. Any other agency personnel (specific individuals or classes of personnel) who are not considered ethics officials but still have ethics responsibilities or otherwise support the ethics program, indicating what those responsibilities are (e.g., HR personnel provide ethics materials during new employee orientation, etc.).
5. Copies of:
 - a. The current DDAEO delegation from SOCO to your organization;
 - b. The delegation to or appointment of the Ethics Program Manager (if applicable); and
 - c. Delegation letters appointing named ethics officials within your DDAEO organization.
6. Current issuances, policies and standard operating procedures (SOPs) governing the overall administration of your ethics program. (Note: SOPs governing specific ethics topics, such as

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financial disclosure, training, and gift reviews, are requested within the relevant topic section below.)

7. Documents demonstrating personnel tracking procedures and human resource office support:
 - a. Copies of In- and Out-Processing forms required to be submitted to the ethics office.
 - a. Copy of agreement/MOA or sample notifications between human resource officials and the ethics office demonstrating that HR is providing ethics officials with information concerning the appointment and termination of financial disclosure filers. See 5 C.F.R. § 2638.105(a)(1) and 2638.105(a)(2).
 - b. Sample letters indicating compliance with the requirements that certain ethics language be included in Federal job offer and new supervisor letters. See 5 CFR 2638.303 and 2638.306.

B. Financial Disclosure (see instructions above regarding relevant time period)

1. Copy of Standard Operating Procedure (SOP) for management of the Financial Disclosure Program, that includes the following:
 - a. The collection, technical review, conflicts of interest analysis, and public availability of Public Financial Disclosure Reports (OGE 278e) and Periodic Transaction Reports (OGE Form 278-T). See 5 U.S.C. app 402(d)(1) & (2).
 - b. The collection, review, and evaluation, of Confidential Financial Disclosure Reports (OGE 450). See 5 U.S.C. app 402(d)(1) & (2).
 - c. Tracking filing extensions and subsequent approvals for extensions granted over 45 days. See 5 CFR 2634.201(g).
 - d. The identification of new and departing public and confidential filers.
 - e. The process by which human resources officials promptly notify the DDAEO of:
 - i. Appointments to public and confidential financial disclosure filing positions; and
 - ii. Termination of public financial disclosure filers See 5 C.F.R. § 2638.105(a)(1) and 2638.105(a)(2).
 - f. Annual reviews of and updates to the roster of financial disclosure report filers
 - g. Following up on delinquent filers and supervisors.
2. Copies of any exemptions to electronic filing granted by the DDAEO for the review period identified above.
3. OGE 278 Public Financial Disclosure Reporting. Provide the following documents for the review period identified above:
 - a. A copy of the Integrity “List of Reports in System” reports showing all OGE 278 filing data, sorted by report type, then filer name. Must be exported to Excel.
 - i. For PAVs scheduled to occur after June 30th, provide a copy of the Integrity “List of Reports in System” report for the current CY AND the previous CY.
 - b. A copy of all reports, including any related cautionary guidance, advice, or remedial actions.
 - c. A list of any personnel submitting a public report outside of the Integrity system, together with an explanation of their filing status along with copies of any reports submitted outside of Integrity.
 - d. A list of anyone who was required to file a report but didn’t, and an explanation as to why a report wasn’t filed, if applicable. This includes individuals who may have filed the wrong report (e.g., new entrant vice annual, etc.)

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- e. Copies of written requests for filing extensions and the subsequent written approvals for extensions granted over 45 days. Note that comments in the filing system suffice as written approvals, but you must still provide a screenshot or other documentation of compliance.
 - f. A list of any individuals who owed and/or paid a late fee or for whom a late fee was waived and the justification for any waiver.
4. OGE 450 Confidential Financial Disclosure Reporting. *Provide the following documents for the review period identified above:*
- a. A copy of the FDM “Disclosure Detail Report” showing all OGE 450 filing data, sorted by report type, then filer name. Must be exported to Excel.
 - i. *For PAVs scheduled to occur after June 30th*, provide a copy of the FDM “Disclosure Detail Report for the current CY AND the previous CY.
 - b. A list of any employees who filed outside the FDM system, together with an explanation of their filing status and a copy of each such report.
 - c. A list of anyone who was required to file a report but didn’t, and an explanation as to why a report wasn’t filed, if applicable. This includes individuals who may have filed the wrong report (e.g., new entrant vice annual, etc.)
 - d. A copy of no more than 50 reports, including any related cautionary guidance, advice, or remedial actions, except as follows:
 - i. DO NOT include “blank” reports.
 - ii. If you have more than 50 reports for a given calendar year, not including “blank” reports, you may provide a random sample of at least 50 reports, but must include all reports that contain individual stock, virtual currency, sector fund holdings, private equity, spousal employment, and outside positions in that sample.
 - e. Copies of written requests for filing extensions and the subsequent written approvals for extensions granted over 45 days. Note that comments in the filing system suffice as written approvals, but you must still provide a screenshot or other documentation of compliance. See 5 CFR 2634.201(g).

C. **Education and Training**

1. Copy of Standard Operating Procedures (SOPs) for management of the Ethics Training Program, to include:
 - a. Identification of new personnel required to receive Initial Ethics Training (IET) within three months of appointment.
 - b. Identification of financial disclosure filers required to receive Annual Ethics Training (AET)
 - c. Tracking completion of IET and AET (e.g., tracking spreadsheets, email confirmations, sign-in rosters, procedures indicating material is automatically provided, etc.)..
 - d. Following up on delinquencies/non-compliance.
2. A copy of the initial ethics training (IET) material provided to all new employees. 5 CFR 2638.304.
3. A copy of the tracking spreadsheet/database demonstrating that new employees hired during the previous calendar year received Initial Ethics Training.
4. Annual training material provided to:

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- a. Public financial disclosure report filers;
 - b. Confidential financial disclosure filers (if different than that for public filers)
5 CFR 2638.305 & 307.
5. A copy of the tracking spreadsheet/database demonstrating that all covered employees received Annual Ethics Training in the previous calendar year.
 6. List of senior leaders who led Annual Ethics Training.
 7. Additional ethics-related training materials provided by the agency (e.g., supervisory training, ethics official training, financial disclosure review training).

D. **Written Advice/Counseling**

1. Copy of any Standard Operating Procedures (SOPs) for ethics reviews of the following:
 - a. Outside activities and employment.
 - b. Approval of acceptance of travel benefits from non-Federal sources under 31 U.S.C. § 1353, including the process for conducting conflict of interest analysis and submitting bi-annual reports to SOCO.
 - c. Acceptance of gifts to individual personnel, such as WAGs and items of personal property.
 - d. Any other DDAEO organization-specific ethics prohibitions, restrictions, and requirements.
2. Copies of the six most recent substantive ethics opinions (memoranda, letter, or e-mail opinions) issued during the past calendar. If available, include at least one opinion for each of the following topics: financial conflicts of interest, impartiality, gifts, misuse of position, outside activities, and support to non-Federal entities. Do not provide more than one opinion per topic, except where an opinion covers multiple topics such that the duplication is ancillary. To avoid duplication with the materials requested in the financial disclosure section, do not include cautionary guidance or other advice provided based upon review of financial disclosure reports.
3. Copies of the three most recent opinions provided to a senior official (GO/FO or SES). At least one sample senior leader opinion should be an opinion provided to your most senior leader, if available.
4. Copies of five of the most recent post-Government employment opinions. If available, you should include at least one opinion drafted for a “senior” employee and one opinion required to be stored in AGEAR.
5. Copies of employee handouts covering the rules on seeking employment and post-Government employment (senior and non-senior).

E. **Enforcement**

1. Documents or narrative outlining ethics office relationship with agency Inspector General or equivalent office.
2. Procedures for referring ethics violations to the Inspector General or equivalent office.

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F. Conflicts Remedies

1. Provide copies of any approved waivers under 18 U.S.C. 208(b)(1).

G. Special Government Employees (SGEs) *(If your agency/command has no SGEs, indicate "N/A" here: _____)*

1. List of all advisory committees, copies of their charters, lists of their members and the committee manager/DFO. Also include the meeting dates for each committee, council, board, commission, etc., and which SGE's attended. (This information is necessary to determine if SGE's filed financial disclosure reports and received Initial Ethics Training timely.)
2. List of individuals who served for 130 days or less during any 365 days (i.e., temporarily on either a full-time, intermittent, or part-time basis) and are assigned to committees, councils, boards, commissions, etc., identified, if applicable, by SGEs and non-SGEs.
3. List of individuals who served for 130 days or less during any period of 365 days (e.g., experts/consultants), identified, if applicable, by SGEs and non-SGEs.
4. List of SGEs required to file public or confidential financial disclosure reports during two most recently completed filing cycles, as determined by your SOCO POC.
5. Requests for filing extensions and the subsequent written approvals for all extensions granted over 45 days for SGEs.
6. List of all SGEs excluded from filing confidential financial disclosure reports (or sections of the report) under 5 CFR 2634.904(b). Please provide any documentation used in making the exclusion determination.
7. Training material and method used to provide initial ethics orientation and ethics training for SGEs (e.g., tracking spreadsheet, email confirmations, sign-in rosters, etc.).
8. Procedures for tracking completed initial and ethics training for all SGE employees (e.g., tracking spreadsheet, email confirmations, sign-in rosters, etc.)
9. Copies of all financial disclosure reports filed by SGEs, along with any cautionary guidance, advice, or remedial actions.