

DoD SOCO Program Assist Visit Checklist

DoD SOCO will review, at a minimum, the following items:

Program Administration

1. Agency organizational chart which indicates the placement of the ethics office.
2. Delegation letters authorizing named ethics officials to coordinate and manage the ethics program. 5 CFR 2638.202(c).
3. Policies and procedures governing the overall administration of your ethics program (e.g., training, outside activities, financial disclosure, IG referral procedures, and arrangements with supporting or supported offices.)

Public, Confidential, and Alternative Financial Disclosure

1. List of employees required to file public and confidential financial disclosure reports.
2. Procedures for tracking filing extensions and subsequent written approvals for extensions granted over 45 days. 5 CFR 2634.201(f).
3. Procedures for identifying new and departing filers.

Education and Training

1. Written plan for conducting annual ethics training for current calendar year. 5 CFR 2638.706. (Annual Training Plan)
2. Initial ethics orientation material provided to all new employees. 5 CFR 2638.703. (Tracking initial ethics orientation for covered employees (e.g., tracking spreadsheets, email confirmations, sign-in rosters, procedures indicating material is automatically provided, etc.))
3. Annual training material provided to public filers. 5 CFR 2638.704.
4. Annual training material provided to confidential employees. 5 CFR 2638.705.

(Note: If different training material was provided to different groups of employees, please clarify which material was provided to each group of employees.)

5. Procedures for tracking annual training for covered employees (e.g., tracking spreadsheet, email confirmations, sign-in rosters, etc.)
6. Additional ethics-related training material provided by the agency (e.g., supervisory training, ethics official training, financial disclosure review training).

7. Procedures for ensuring compliance with 5 C.F.R. 2638.303-310, to include ensuring that servicing personnel offices from other components/agencies are providing required confirmations.

Written Advice/Counseling

1. Samples of advice and counsel provided by email or memorandum which address: financial conflicts of interest, impartiality, post-government employment, gifts, financial disclosure, misuse of position, outside activities, and other ethics topics.

Agency-Specific Ethics Prohibitions, Restrictions, and Requirements

1. Written approvals for holding outside positions. (Updated DoD Supplemental Regulations do away with this requirement.)

Conflicts Remedies

1. Waivers (18 U.S.C. 208(b)(1)).

Enforcement

1. Relationship with agency Inspector General or equivalent office.

Special Government Employees

1. Advisory committees (e.g., charters, advice to members.)
2. 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. 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. SGEs required to file public or confidential financial disclosure reports in.
5. Requests for filing extensions and the subsequent written approvals for all extensions granted over 45 days for SGEs. 5 CFR 2634.201(f).
6. Training material and method used to provide initial ethics orientation and annual ethics training for SGEs (e.g., tracking spreadsheet, email confirmations, sign-in rosters, etc.)
7. Procedures for tracking completed initial and annual ethics training for all SGE employees (e.g., tracking spreadsheet, email confirmations, sign-in rosters, etc.)

Travel Payments under 31 U.S.C. § 1353

1. Policies and procedures governing the acceptance of travel payments, including the process for conducting conflict of interest analysis (if not provided in the Program Administration section).