



US DEPARTMENT OF VETERANS AFFAIRS **OFFICE OF INSPECTOR GENERAL**

Office of Special Reviews

VA ACQUISITION ACADEMY

Former Acquisition Academy Executive Violated Ethical Standards and VA Policy

BE A
VOICE FOR
VETERANS

REPORT WRONGDOING
vaoig.gov/hotline | 800.488.8244

OUR MISSION

To serve veterans and the public by conducting meaningful independent oversight of the Department of Veterans Affairs.

CONNECT WITH US



Subscribe to receive updates on reports, press releases, congressional testimony, and more. Follow us at @VetAffairsOIG.

PRIVACY NOTICE

In addition to general privacy laws that govern release of medical information, disclosure of certain veteran health or other private information may be prohibited by various federal statutes including, but not limited to, 38 U.S.C. §§ 5701, 5705, and 7332, absent an exemption or other specified circumstances. As mandated by law, the OIG adheres to privacy and confidentiality laws and regulations protecting veteran health or other private information in this report.



Executive Summary

In August 2023, the Office of Inspector General (OIG) received allegations that the then Chancellor of the VA Acquisition Academy, Judith Dawson, engaged in misconduct in connection with a VA conference held in August 2023, the Acquisition Workforce Innovation Symposium (the symposium). The alleged misconduct included accepting gifts from a conference center hotel in Aurora, Colorado (the conference center), which was selected as the site of the symposium. She also allegedly solicited and accepted sponsorships from vendors for social events for VA attendees. The OIG's Office of Special Reviews initiated this administrative investigation in October 2023 to review these misconduct allegations.

In March and July 2024, the OIG obtained evidence of additional potential misconduct by Ms. Dawson. The OIG's investigation resulted in the three findings and three recommendations summarized below.¹ Ms. Dawson, who was a member of the senior executive service, retired from VA effective August 31, 2024.

The Acquisition Academy provides training and professional development services for VA employees involved in managing acquisitions for VA.² Its mission includes creating "a workforce that is regarded as 'best in class' where acquisition professionals are referred to as 'trusted business advisors.'" To this end, the Acquisition Academy held the symposium in 2023, which included training sessions on a wide variety of acquisition-related topics, such as strategies to leverage new technologies as well as best practices in market research, contract negotiations, and engagement with small businesses. The symposium was described as an opportunity to network with VA acquisition professionals and obtain "comprehensive training."

As a result of its investigation, the OIG made three findings. First, Ms. Dawson knowingly accepted multiple impermissible gifts from the conference center and violated VA policy by improperly directing staff to solicit and accept gifts of sponsored social events at the symposium, purportedly on behalf of VA.

The federal gift rule and Federal Acquisition Regulation strictly limit federal employees' acceptance of gifts from vendors such as the conference center.³ Ms. Dawson initially accepted three free meals plus snacks from the conference center during a site visit in February 2023,

¹ For more information on the scope and methodology of this administrative investigation, see appendix A.

² In the federal government, "acquisition" means using appropriated funds to contract for supplies or services. Federal Acquisition Regulation (FAR) 2.101. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, award of contracts, contract financing, contract performance, contract administration, and technical and management functions directly related to the process of fulfilling agency needs by contract. FAR 2.101.

³ 5 C.F.R. § 2635.202; FAR 3.101-1; FAR 3.101-2.

while VA was evaluating the conference center as a potential symposium site.⁴ Ms. Dawson also accepted additional free services and goods from the conference center during the symposium, including spa treatments valued at more than \$2,300, as well as merchandise from the spa's gift shop.

At Ms. Dawson's direction, VA staff also solicited and accepted sponsorships from a trade association and private companies, some with VA contracts, to pay for social activities at the symposium that VA could not fund. According to VA policy, gifts to VA must primarily benefit veterans and cannot be accepted on the condition, or with the expectation, of special treatment for the donor.⁵ The OIG found that the sponsorships were for activities that primarily benefited VA employees rather than veterans, and they created appearances of preferential treatment and privileged access for certain sponsors. Therefore, Ms. Dawson could not direct the solicitation or acceptance of the symposium sponsorships. The OIG also found that the VA responsible conference executive assigned to the symposium failed to consult the Office of General Counsel Ethics Specialty Team regarding the sponsorships, as VA conference policy required.

Second, the OIG found that Ms. Dawson at times discouraged her executive assistant from raising questions or seeking guidance regarding potential ethical violations in connection with the symposium. This practice was contrary to legislative direction that supervisors are to foster an environment in which VA employees could express concerns.⁶ It was also inconsistent with the expectations for members of the senior executive service.⁷

Finally, Ms. Dawson did not report the spa services she received from the conference center as gifts on her annual public financial disclosure report for 2023, even though the value of the gifts exceeded the reporting threshold. Instead, Ms. Dawson indicated that she had no reportable gifts.

Because Ms. Dawson retired from VA, the OIG made no recommendations with respect to possible administrative action against her. However, the OIG recommended that VA determine whether any additional steps need to be taken regarding Ms. Dawson's 2023 public financial disclosure based on the findings of this report. The OIG also made two recommendations regarding other VA employees, including considering whether additional training or other measures are necessary with respect to their acceptance of free meals from the conference center

⁴ Six other VA employees attended the site visit with Ms. Dawson. As discussed in Finding 1, the OIG determined that at least five of the other VA employees improperly accepted free meals from the conference center during the site visit.

⁵ Secretary's Memorandum for Under Secretaries, Assistant Secretaries, and other Key Officials, *Renewal of Delegation of Authority for Acceptance of Gifts Under P.L. 102-86* (Sept. 10, 2005), at 2.

⁶ The Department of Veterans Affairs Accountability and Whistleblower Protection Act of 2017 requires that VA establish performance criteria for all supervisory employees that "promotes the protection of whistleblowers," including to "foster an environment in which employees of the Department feel comfortable reporting concerns to supervisory employees or to the appropriate authorities." Department of Veterans Affairs Accountability and Whistleblower Protection Act, P.L. 115-41 § 102 (2017); 38 U.S.C. § 732.

⁷ VA Handbook 5027, *Senior Executive Service*, Part III, app. A, April 15, 2002.

during the site visit and with respect to the improper solicitation of industry sponsorships of symposium events.

VA Comments and OIG Response

VA's chief acquisition officer, who also serves as principal executive director of the Office of Acquisition, Logistics, and Construction, along with VA's acting general counsel, who also serves as the designated agency ethics official, reviewed the draft report and concurred with the OIG's three findings and recommendations. Their full responses are published as appendixes B and C, respectively. The OIG acknowledges that VA provided acceptable action plans and completion timelines in response to the recommendations and will monitor their progress until sufficient documentation has been received to close them as implemented.



REBECCA L. KLINE DUBILL
Deputy Assistant Inspector General
for Investigations

Contents

Executive Summary	i
Abbreviations	v
Introduction.....	1
Findings and Analysis.....	5
Finding 1: Ms. Dawson Violated Ethics Rules by Accepting Multiple Impermissible Gifts from a Prohibited Source and Violated VA Policy by Improperly Directing Staff to Solicit and Accept Gifts Purportedly on Behalf of VA	5
Finding 2: Ms. Dawson Discouraged Her Executive Assistant from Seeking Ethics Advice on Gifts and Sponsorships	15
Finding 3: Ms. Dawson Failed to Disclose Gifts from the Conference Center on Her 2023 Annual Public Financial Disclosure.....	20
Conclusion	21
Recommendations.....	22
VA Comments and OIG Response	23
Appendix A: Scope and Methodology.....	24
Appendix B: Principal Executive Director, Office of Acquisition, Logistics, and Construction and Chief Acquisition Officer Comments.....	25
Appendix C: Acting General Counsel and Designated Agency Ethics Official Comments	27
OIG Contact and Staff Acknowledgments	29
Report Distribution	30

Abbreviations

FAR	Federal Acquisition Regulation
OGC	Office of General Counsel
OIG	Office of Inspector General
RCE	responsible conference executive



Introduction

In August 2023, the Office of Inspector General (OIG) received allegations that the then Chancellor of the VA Acquisition Academy, Judith Dawson, engaged in misconduct in connection with a conference the academy hosted, the Acquisition Workforce Innovation Symposium (the symposium). In response to the allegations, the OIG initiated an administrative investigation examining whether Ms. Dawson solicited or accepted improper gifts from the conference center hotel (the conference center) that hosted the symposium and solicited and accepted impermissible sponsorships for VA employee social events held during the symposium. The OIG also examined whether Ms. Dawson failed to disclose certain gifts from the conference center on her annual public financial disclosure report for 2023 and discouraged her executive assistant from seeking legal guidance on ethical concerns about the symposium.⁸ Ms. Dawson retired from VA effective August 31, 2024. For more information on the scope and methodology of this administrative investigation, see appendix A.

The VA Acquisition Academy

The mission of the Acquisition Academy is to ensure that VA's acquisition workforce has the requisite education and professional certifications needed to perform their duties.⁹ It seeks to "create a workforce that is regarded as 'best in class' where acquisition professionals are referred to as 'trusted business advisors.'" Its training goals include "align[ing] course content to achieve greater consistency and standardization . . . grounded by the Federal Acquisition Regulation's (FAR) Guiding Principles for exercising sound business judgment." One of those guiding principles is to "conduct business with integrity, fairness, and openness."¹⁰

Before joining VA in 2015, Ms. Dawson served in a variety of contracting and training roles with another federal agency, including as a senior procurement policy analyst and contract specialist. Ms. Dawson joined the senior executive service and was appointed head of the Acquisition Academy in August 2022. She served in that role until her retirement in August 2024. As the head of the Acquisition Academy, Ms. Dawson led the planning and implementation of the symposium.

⁸ The OIG referred the facts relating to Ms. Dawson's acceptance of gifts from the conference center, failure to disclose the gifts on her annual public financial disclosure report, and possible false statements to OIG personnel to the Fraud and Public Corruption section of the US Attorney's Office for the District of Maryland, which declined to open a criminal investigation as of this writing.

⁹ In the federal government, "acquisition" means using appropriated funds to contract for supplies or services. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, award of contracts, contract financing, contract performance, contract administration, and technical and management functions directly related to the process of fulfilling agency needs by contract. FAR 2.101.

¹⁰ FAR 1.102(b)(3).

The symposium was held at the conference center in Aurora, Colorado, from August 1–3, 2023. Ms. Dawson described the symposium as a “training event to comply with Federal mandates related to agency responsibilities for the training, professional development, and career management specific to the [acquisition workforce].” She indicated in a request to approve the symposium that it would include “participants from the VA acquisition community . . . other government agencies, and industry,” and would focus on “learning, shar[ing], networking, and providing comprehensive training venues designed to enhance the performance of the VA [acquisition workforce].” The symposium had more than 1,200 in-person attendees and over 1,800 registrations for virtual sessions. The symposium included training sessions on a wide variety of acquisition-related topics, such as strategies to leverage new technologies as well as best practices in market research, contract negotiations, and engagement with small businesses. The total cost of the symposium to VA was \$3,397,847, which was 26 percent lower than the preconference estimate. VA paid \$2,037,916 for travel and \$1,058,937 for attendee shuttles, audio video services, internet access, catering, and other conference services.¹¹

Planning, Approval, and Contracting for the 2023 Symposium

Ms. Dawson first contacted the conference center regarding the 2023 symposium in December 2022. In early January 2023, the conference center informed Ms. Dawson it had availability in August. On January 11, 2023, Ms. Dawson sent an email to certain Acquisition Academy staff and contracting personnel informing them that the symposium would be held at the conference center in early August. The next day, a procurement analyst who reported to Ms. Dawson asked if she should serve as the responsible conference executive (RCE) for the symposium and Ms. Dawson replied, “I think it’s appropriate (if possible) that you lead this portion of the project.”¹² The procurement analyst had not previously served as an RCE for a conference but did receive RCE training on January 13, 2023.

The procurement analyst assembled a conference package, to be approved by the conference approving official. The conference package included a memorandum requesting approval to hold the symposium and to locate it at the conference center, along with a site cost comparison that estimated the total cost of holding the symposium at three geographically diverse sites.¹³ The

¹¹ The OIG rounded these figures to the dollar. The “travel costs” included meals and incidental expenses, lodging, transportation, parking, and “other traveler expenses,” such as ATM and baggage fees. The total cost of the symposium also included \$300,993 in “Other” costs. The Final Conference Report for the symposium states “if audited, the RCE will be required to provide additional details on these costs.”

¹² Per VA conference policy, the RCE “is responsible for planning, approval, oversight, and reporting of VA sponsored or co-sponsored conferences. RCE responsibilities include but are not limited to ensuring proper stewardship of public funds [and] ensuring compliance with VA policy.” VA Financial Policy, Volume XIV, Chapter 10, at 8.

¹³ The site cost comparison indicated that the conference center was the least expensive of the three options.

principal executive director of the Office of Acquisition, Logistics, and Construction approved the conference package on February 8, 2023.

In late February, Ms. Dawson traveled to the conference center for a site visit. She was joined by her executive assistant, the procurement analyst, and four other VA employees involved in planning the symposium.¹⁴ During the site visit, the VA team met with conference center staff for a full day to tour the facility and discuss the conference center's capabilities. Over the course of the day, the conference center provided free breakfast, lunch, and snacks to the VA employees. After the meetings concluded, the conference center provided the VA employees dinner, with alcoholic drinks, again at no charge.

Following the site visit, the procurement analyst prepared a contracting package to be reviewed and approved by the contracting team assigned to the symposium. That package included a performance work statement outlining VA's needs that would have to be met by the conference center, a cost estimate for the symposium, and a memorandum detailing the market research that supported the selection of the conference center. The contracting team completed its "compliance review" in late May and sent the contracting package to the Office of General Counsel's (OGC) Procurement Law Group for legal review.¹⁵ Around this time, the procurement analyst took an extended leave of absence and a different Acquisition Academy employee, who did not report to Ms. Dawson, took on the role of the RCE. The successor RCE was a GS-14 employee who received RCE training in 2018 and served in that role for a prior symposium in 2019.

On June 7, 2023, the VA procurement attorneys completed their review of the contracting package and identified "a few concerns," in particular about whether the market research supporting the selection of the conference center was sufficient. In response, the RCE conducted additional market research and provided a justification for requiring the lodging and event space to be co-located. The procurement attorneys then informed the contracting team on June 20 that the revised contracting package was "legally sufficient." Later that day, the contracting officer

¹⁴ At the time of the site visit, the other four individuals held the positions of Office of Acquisition and Logistics associate executive director for acquisition program support, Acquisition Academy director of enterprise shared services, Office of Small and Disadvantaged Business Utilization's director of direct access, and a customer liaison representative with the Office of Acquisition, Logistics, and Construction. The associate executive director told investigators he was an "executive sponsor" of the symposium and described his role as "making sure that we stayed under the allotted amount of money" for the event. The director of enterprise shared services was the symposium's technology and transportation/travel lead. The Office of Small and Disadvantaged Business Utilization director was responsible for recruiting and organizing exhibitors at the symposium. The customer liaison representative initially served as a senior advisor for the symposium but became the RCE in May 2023.

¹⁵ The contracting officer told investigators that the role of the contracting team was to "make sure that we're in compliance with the FAR, that the market research was done correctly, that there are no other companies out there that can do this. We have to mitigate conflicts of interest if we know of them."

issued a solicitation to the conference center for conference-related services. On July 26, 2023, the contracting officer and conference center executed a contract for those services.

Findings and Analysis

Finding 1: Ms. Dawson Violated Ethics Rules by Accepting Multiple Impermissible Gifts from a Prohibited Source and Violated VA Policy by Improperly Directing Staff to Solicit and Accept Gifts Purportedly on Behalf of VA

Federal employees are forbidden from soliciting or accepting anything of monetary value from anyone having or seeking to obtain business with their agency, subject to certain limited exceptions.¹⁶ The OIG found that Ms. Dawson knowingly accepted impermissible gifts valued at \$2,708 from the conference center during the planning and hosting of the symposium.

Ms. Dawson was aware that she could not accept these gifts from the conference center and acted contrary to training and guidance she had received. Moreover, Ms. Dawson directed the RCE to solicit and accept sponsorships of symposium social events, which were impermissible gifts to VA, and the RCE did not consult with OGC regarding the gifts as VA conference policy required.

Ethics Rules Prohibited Ms. Dawson from Accepting or Soliciting Gifts from the Conference Center

The Standards of Ethical Conduct for Employees of the Executive Branch govern the solicitation and acceptance of gifts by federal employees.¹⁷ The standards define a “gift” as any “item having monetary value,” which specifically includes “meals.”¹⁸ A federal employee generally may not “directly or indirectly” solicit or accept a gift that is from a “prohibited source” or “given because of the employee’s official position.”¹⁹ A prohibited source is any person who is seeking official action by the employee’s agency, is doing or seeking to do business with the agency, or “has interests that may be substantially affected by the performance or nonperformance of the employee’s official duties.”²⁰

The FAR also prohibits accepting or soliciting gifts from prohibited sources. The standards of conduct section of the FAR states that “Transactions relating to the expenditure of public funds require the highest degree of public trust and an impeccable standard of conduct. The general rule is to avoid strictly any conflict of interest or even the appearance of a conflict of interest in

¹⁶ For the purposes of this administrative investigation, the OIG analyzed gift rule exceptions for gifts accepted from a personal friend and gifts of modest amounts of food or of minimal value. 5 CFR §§ 2635.203(b), 2635.204(a)–(b).

¹⁷ 5 C.F.R. § 2635.202.

¹⁸ 5 C.F.R. § 2635.203(b). The gift rule does not apply to “modest items of food and non-alcoholic refreshments, such as soft drinks, coffee and donuts, offered other than as part of a meal.” 5 C.F.R. § 2635.203(b)(1).

¹⁹ 5 C.F.R. § 2635.202(a)–(b).

²⁰ 5 C.F.R. § 2635.203(d).

Government-contractor relationships.”²¹ Applicable federal standards and the FAR prohibit federal employees from accepting anything of value from someone who “has or is seeking to obtain Government business with the employee’s agency.”²²

At the times Ms. Dawson accepted gifts from the conference center, it was a prohibited source under the gift rule and the FAR. In communications with the conference center’s sales staff setting up the site visit, a VA procurement analyst wrote that “the purpose of the site visit is to gather information to ensure that we are able to make the best value decision for the government.” In addition, Ms. Dawson told investigators that the purpose of the site visit was “to see if the space could accommodate us . . .” When Ms. Dawson proposed the site visit, the conference center’s sales staff responded by requesting a “letter of intent” to hold the symposium at the conference center, explaining “I just don’t want to lose your dates.” Accordingly, at the time of the site visit, the conference center was seeking official action from Ms. Dawson’s agency and seeking to do business with VA. When Ms. Dawson returned to the conference center in late July 2023, VA had approved the conference center as the symposium site and executed a contract with it for conference services. At that time, the conference center was a prohibited source because it was doing business with VA.

Ms. Dawson told the OIG she understood that the federal gift rule prohibited her from accepting gifts over a certain value, explaining that “for the most part everybody knows that you can’t—and the [conference center] knew that we can’t accept gifts over a certain threshold . . .”²³ When asked what the threshold was, Ms. Dawson said “I don’t know, was it \$25 or \$50 in a year or something like that?”²⁴ Moreover, Ms. Dawson recalled communicating the gift rule restrictions to the conference center in mid-2023, saying “we definitely talked about, hey, don’t try to give us a whole bunch of extra stuff because we can’t accept it.”

Ms. Dawson Accepted Personal Gifts from the Conference Center Before and During the Symposium

The OIG found that Ms. Dawson accepted multiple gifts from the conference center in 2023. She accepted free meals and snacks during the site visit she organized to evaluate the conference center as a location for the symposium. Then, during the symposium, Ms. Dawson accepted gifts of spa services and merchandise from the conference center.

²¹ FAR 3.101-1.

²² FAR 3.101-2.

²³ In September 2022, Ms. Dawson completed annual ethics training required of senior VA officials who file public financial disclosures. The training addressed the rules pertaining to the acceptance of gifts and provided illustrative examples. The final slide in the training admonished participants to “Seek Advice BEFORE You Act.” The materials included contact information for ethics counselors.

²⁴ The gift rule permits an employee to accept unsolicited gifts valued at \$20 or less “per source per occasion, provided that the aggregate market value of individual gifts received from any one person . . . does not exceed \$50 in a calendar year.” 5 CFR § 2635.204(a).

Ms. Dawson Arranged a Site Visit to the Conference Center for Herself and Six Other VA Employees and Improperly Accepted Free Meals from the Conference Center During the Site Visit

As part of the symposium planning, Ms. Dawson arranged for herself and six other VA employees to conduct a site visit of the conference center from February 28, 2023, through March 1, 2023. While Ms. Dawson was planning the site visit, the conference center offered to provide transportation for the VA employees from Denver International Airport to the conference center. Ms. Dawson initially accepted the offer, but a conference center representative emailed her on February 8, 2023: “It was brought to my attention that the [conference center] may not be able to provide transportation to/from the airport due to government policies. Should I let your team know to book an Uber or alternative transportation?” Ms. Dawson spoke with the representative by phone, then replied to the representative’s email: “I was under the assumption that we would be transported by hotel shuttle to the [conference center]. Since this is not the case, we will take Uber or Lyft to and from the [conference center].”²⁵

On February 23, 2023, the executive assistant emailed an OGC ethics attorney for guidance about the site visit. She said the conference center “has not offered anything, but below are a few hotel industry practices that come to mind, and I am just looking for general guidance on what is and is not acceptable as a federal employee.” She listed “room upgrades, complimentary transportation, and meal tasting” as the “hotel industry practices” she was focused on. The OGC attorney advised: “Generally, you should accept nothing. You should pay for what you need. That is especially true in this case, where you are planning to control the spending of large amounts of Government tax money.” The executive assistant shared this advice with Ms. Dawson by email, on February 24, 2023, explaining that the conference center had asked what VA employees could accept during the site visit and “I don’t think we got back to them so I reached out to OGC for guidance . . .” Ms. Dawson did not reply to the email or discuss the issue with the executive assistant.

The site visit was held on February 28, 2023, and the written agenda for the visit reflects that Ms. Dawson and the other VA attendees met with conference center staff from 7:50 a.m. to around 4:00 p.m. The conference center provided the VA attendees with breakfast, lunch, and a selection of snacks and beverages, all at no charge. The conference center valued the breakfast at \$64 per person, lunch at \$71 per person, and the snacks and beverages at \$54 per person.²⁶ After the last meeting of the day, the conference center provided VA employees with a multi-course dinner, including alcoholic drinks, again at no charge. The conference center paid the dinner bill,

²⁵ The conference center did not provide airport transportation to the VA group.

²⁶ These amounts include service fees and taxes.

which came to \$83 per person.²⁷ In total, the VA employees received food and drinks valued at approximately \$272 per person but paid nothing.²⁸ Two of the employees told investigators they offered to pay for their dinners but were rebuffed by conference center staff.²⁹

Ms. Dawson told investigators she did not recall whether the conference center provided meals but speculated that she would not have consumed the food offered because of a restricted diet. However, the evidence the OIG obtained from other sources indicates that Ms. Dawson was aware that breakfast, lunch, and dinner were planned and did partake in the free meals. The agenda for the site visit included breakfast and lunch, Ms. Dawson was informed of the dinner the day before the site visit, and three VA employees testified that Ms. Dawson ate the free food. In addition, travel reimbursement records submitted by Ms. Dawson did not claim any *per diem* meal allowance for the day that the meals were provided by the conference center.³⁰ In an email, Ms. Dawson told an Acquisition Academy employee who prepared her travel voucher that “M&IE”—which stands for Meals & Incidental Expenses—“was included for my stay at the [conference center].” The employee understood that to mean Ms. Dawson received meals from the conference center, and Ms. Dawson signed a travel voucher indicating she received breakfast, lunch, and dinner on February 28.

Ms. Dawson Accepted Personal Gifts of Spa Services and Merchandise from the Conference Center

Ms. Dawson told investigators that while she was attending the symposium, the conference center’s senior sales executive gifted her a massage at the conference center’s spa. According to Ms. Dawson, she intended to give a reciprocal gift to the senior sales executive at an unspecified

²⁷ Although a conference center document indicated that the dinner was billed to both the conference center and the local visitor’s bureau, a former employee of the visitor’s bureau who arranged the dinner did not recall receiving a bill.

²⁸ The OIG found that, in addition to Ms. Dawson, at least five other VA employees accepted impermissible gifts of meals and drinks from the conference center.

²⁹ The Office of Acquisition and Logistics associate executive director for acquisition program support told investigators he informed the conference center he wanted to pay for his dinner “and they insisted no.” He said “I was put in a very, I think, difficult position . . . I don’t want to insult them.” The executive assistant told investigators she gave her credit card to a member of the conference center staff after the dinner to pay for her meal, but they “tossed it” back to her. At the end of the site visit, the executive assistant asked a conference center manager if she could pay for all of the free meals and he agreed. She told investigators she then became concerned that paying for the meals with her government travel card would create an “unauthorized commitment,” which she described as “where you ask to be charged for something that has not been approved by I guess contracting or some other entity.” She then told the conference center manager to “disregard” her request to pay for her meals.

³⁰ In contrast, Ms. Dawson claimed a meal allowance *per diem* on the travel days preceding and following the meetings at the conference center.

future date, but this never occurred.³¹ When asked if she received any other spa treatments “paid for by either the [conference center] or anyone from the [conference center],” Ms. Dawson said “No, they had my Chase credit card so everything else should have been on my credit card.”

The conference center produced records to the OIG that contradicted Ms. Dawson’s account. First, Ms. Dawson accepted free spa services from the conference center on three different occasions during the days prior to and during the symposium, not one time as Ms. Dawson stated. Those services had a total value of \$2,348. Second, in addition to spa services, Ms. Dawson accepted free merchandise valued at about \$88 from the conference center’s spa.

The conference center’s records show that Ms. Dawson accepted the spa services and merchandise listed in table 1.³² The records, which include emails between sales executives and the spa director, also indicate that the conference center, not Ms. Dawson, paid for the spa services.

³¹ Ms. Dawson providing a reciprocal gift would not have cured the violation of the rule against accepting a gift from an employee of a prohibited source unless the gift was given on the basis of a family relationship or personal friendship. 5 CFR § 2635.204(b). Ms. Dawson told investigators she had no family or friends who worked for the conference center. Further, the “personal friendship” exception to the gift rule does not apply when a personal friend provides a gift but their employer (if a prohibited source) actually pays for it. 5 CFR § 2635.204(b) (Example 2). Based on the conference center’s records and internal emails, the OIG found that the conference center—not its senior sales executive—paid for the spa services Ms. Dawson accepted.

³² The invoice for each date lists Ms. Dawson’s name and does not include names of any other VA employees. However, a conference center email indicates that the spa appointment for August 3, 2023, was to include massages for Ms. Dawson, her executive assistant, and the RCE. The executive assistant declined the massage. A calendar invite for the August 3 appointment shows that Ms. Dawson invited the RCE to the conference center’s spa and included “Compliments of Judith” in the invitation. The RCE told investigators that Ms. Dawson invited her to the spa in recognition of her hard work and she received a one-hour massage. When the RCE attempted to pay, a spa representative told her it was “taken care of” because she was with Ms. Dawson. The RCE believed that Ms. Dawson had paid for the massage. Accordingly, the OIG found that some of the spa services listed under Ms. Dawson’s name for August 3, 2023—valued at \$233—were actually provided to the RCE. However, the OIG found that Ms. Dawson accepted the gift of spa services for herself and the RCE, then purported to transfer part of the gift to the RCE.

Table 1. Spa Services and Merchandise Provided to Ms. Dawson

Date	Services or Merchandise	Value (including fees and gratuity)
7/29/2023	Custom Facial – 50 minutes	\$259
7/29/2023	Shower bursts Hand cream Candles with wood lid	\$88
7/30/2023	Calming Massage – 50 minutes Himalayan Salt Stone Custom Facial – 80 minutes Abature Lip Service Paraffin / Facials Ultimate Booster	\$708
8/3/2023	Custom Massage – 50 minutes Custom Massage – 50 minutes Custom Massage – 50 minutes Custom Facial – 80 minutes Face Mask Eye Mask Paraffin / Facials Ultimate Booster Scrub Himalayan Salt Stone	\$1,381
		TOTAL: \$2,436

Source: Conference center's records.

Based on the conference center's records and Ms. Dawson's testimony, the OIG found that Ms. Dawson accepted spa services and merchandise with a total value of \$2,436 from the conference center between July 29, 2023, and August 3, 2023.

Ms. Dawson Violated VA Policy by Directing Staff to Solicit and Accept Prohibited Gifts

In the months leading up to the symposium, Ms. Dawson proposed, planned, and tasked other VA employees with executing employee engagement activities at the symposium. After-hours events included a group trip to a Major League Baseball game and two happy hours held at the conference center. At Ms. Dawson's direction, the RCE and other members of Ms. Dawson's staff arranged sponsors to pay for the happy hours and the charter buses for the baseball game. For the reasons discussed below, the OIG determined that these sponsorships were impermissible gifts to VA. In addition, the OIG found that the RCE failed to obtain advice from OGC Ethics Specialty Team concerning the authority to accept these gifts, which was a duty specifically assigned to her by VA policy governing conference planning.

A VA Contractor Paid for Two Happy Hours for VA Employees

The initial plan for symposium social events included three after-hours cash bar events, and plans for these events included VA paying the conference center a fee for providing bartenders. Three weeks before the symposium, the VA contracting officer informed the conference center that VA could not pay the bartending fee. The contracting officer wrote that “the Federal Government cannot under any circumstances pay for a bartender . . . I’m not sure who requested this but this is a clear violation of federal regulations.”

Ms. Dawson was copied on the contracting officer’s email. Ms. Dawson then provided the RCE with names of potential sponsors who might pay for the bartender and directed the RCE to contact them. On July 19, 2023, less than two weeks before the symposium, the RCE met with a representative of a trade association for veteran-owned small businesses to discuss the trade association’s potential sponsorship of networking events. The trade association agreed at the time to sponsor two happy hours. However, the trade association’s representative told investigators that the trade association intended to ask a member company to be the sponsor. Ultimately, one such member—a VA contractor—paid for two happy hours. The contractor’s total payment was \$6,047, which covered bartending fees and 442 alcoholic drinks.³³

Industry Sponsors, Including a VA Contractor, Paid for Charter Bus Transportation for VA Employees Attending a Baseball Game

Optional social events at the symposium included a group outing to a baseball game, where VA employees purchased their own tickets to the game. Ms. Dawson’s staff explored whether VA could pay to transport attendees from the conference center to the stadium, a distance of about 18 miles. In March 2023, Ms. Dawson’s executive assistant asked the Office of Financial Policy if VA could pay for this type of transportation. The office replied, “No, appropriated funds can only be used to pay for official business travel expenses. The off-site activity . . . would be a personal expense to attend.” The executive assistant shared this response with Ms. Dawson, who suggested including the baseball game as an entertainment option in the symposium program guide but did not comment on the guidance that transportation to the game would be a personal expense. In mid-July 2023, Acquisition Academy employees involved in planning social events for the symposium revived the question of chartering buses, with the understanding that VA employees would pay for their own seats on the bus. This proved unworkable because the charter bus company required payment for the entire bus, regardless of how many VA employees traveled in it.

On July 18, 2023, Ms. Dawson commented in an email thread discussing the buses, “I’m wondering if this is yet another area [where] we could get a corporate sponsor to absorb this

³³ The RCE told investigators she was not familiar with the VA contractor and believed the trade association paid for the happy hours.

cost??? This is how we are paying for the ‘bartending’ expense for our evening socials.” The RCE then solicited a bus sponsorship from the same trade association for veteran-owned small businesses that had agreed to pay for the happy hours, but they declined to sponsor the buses. Ms. Dawson next asked a personal friend to help obtain sponsors, explaining “we are not allowed to solicit sponsorship from vendors.” The friend, who worked for a VA contractor and was a volunteer representative for a contract management trade association, facilitated sponsorships from five exhibitors at the symposium to pay for the buses.³⁴ Four of the sponsors were vendors, including a VA contractor the friend worked for. The fifth sponsor was the contract management trade association the friend volunteered with.³⁵ The five sponsors paid \$2,992 to charter two buses for VA employees.

It Was Impermissible for VA to Solicit the Event Sponsorships

The symposium program guide stated, under a list of the sponsors and their logos, that “VA acknowledges the financial support provided by” the sponsors, and asserted the sponsorships were “for the purpose of providing financial support to VA’s initiatives . . .” Federal law authorizes VA to accept gifts that are intended to benefit veterans, or “which will enhance the Secretary’s ability to provide services or benefits.”³⁶ OGC has interpreted this authority to also allow VA to solicit gifts that enhance its ability to provide services or benefits to veterans. A delegation of authority issued in 2005 by the then VA Secretary includes “Governing Principles” for acceptance of gifts to VA.³⁷ Those principles require the accepting official to ensure that “gifts will not be used to enrich employees” and state that “where a benefit to employees results, it must be clearly incidental or secondary to the favorable impact on veterans and their dependents.”³⁸ The OIG found that the sponsorships Ms. Dawson directed the RCE to solicit and accept did not meet this criteria. While the benefit received by the VA employees partaking in the symposium social events is readily perceivable, the gifts did not result in any clear benefit to veterans. This is the opposite of what the “Governing Principles” require: that the benefit to employees be incidental and secondary. Accordingly, Ms. Dawson violated VA policy regarding

³⁴ Ms. Dawson’s friend told investigators she did not communicate with Ms. Dawson regarding the sponsorships, and indicated it was the executive assistant who asked her to obtain sponsors for the symposium. However, the RCE recalled Ms. Dawson introducing her to the friend and saying, “She can help identify the sponsors.” Further, email communications indicated that Ms. Dawson knew her friend was involved in obtaining sponsors, and the friend asked Ms. Dawson days before the symposium if additional sponsors were needed.

³⁵ Three of the vendors paid \$750 each to sponsor the buses, and the fourth paid \$250. The contract management trade association agreed to contribute \$750, but it is not clear if it paid that full amount.

³⁶ 38 U.S.C. § 8301.

³⁷ R. James Nicholson, Secretary of Veterans Affairs, “Renewal of Delegation of Authority for Acceptance of Gifts Under P.L. 102-86,” Memorandum for Under Secretaries, Assistant Secretaries, and other Key Officials, September 10, 2005, at 1-2.

³⁸ R. James Nicholson, Secretary of Veterans Affairs, “Renewal of Delegation of Authority for Acceptance of Gifts Under P.L. 102-86,” Memorandum for Under Secretaries, Assistant Secretaries, and other Key Officials, September 10, 2005, at 2.

the solicitation and acceptance of gifts when she directed her subordinates to pursue these sponsorships.³⁹

The Responsible Conference Executive Failed to Follow VA Policy Requiring a Consultation with OGC Concerning the Impermissible Sponsorships

VA's conference policy states that "RCEs must consult with OGC's Ethics Specialty Team on whether any proposed gift(s) may be accepted (e.g., special rates or benefits) within the conference occurrences" Despite this requirement, the RCE carried out Ms. Dawson's directions to obtain the sponsorships without consulting OGC. As discussed in Finding 2, the OIG determined that Ms. Dawson's executive assistant consulted the OGC Ethics Specialty Team about the sponsorships and was cautioned that they could violate federal appropriations law. The executive assistant shared this guidance with the RCE. However, the RCE did not discuss the issue with the executive assistant and told investigators, "I didn't even read the email from [the OGC ethics counselor] to even note, okay, you're supposed to discuss appropriations issues."

Rather than consulting OGC, the RCE told investigators she discussed the permissibility of the sponsorships with two people: Ms. Dawson and a member of the contracting team assigned to the symposium. The RCE said "I believe Judith Dawson said that somebody told her that she can [accept sponsorships for conference events] because another agency did it and so it was through hearsay." The RCE did not know who told Ms. Dawson this, but said "I wasn't concerned because . . . Judith, she said that she consulted with her peers at her level, and they said they do it all the time."

The RCE also discussed the sponsorships with a contracting team member, who said, "there are times where sponsors can pay in support of a learning event," and pointed the RCE to guidance on the issue. The RCE told investigators she "may have glanced over" guidance on sponsorships but said "I'm not sure." The RCE explained that if she did review the guidance, she did not read it "in detail" because, in her opinion, her "primary role and responsibility was trying to get all the contract stuff in place" and she was working "under a real time constraint." The RCE also stated that her "main objective was to facilitate the training event and . . . anything dealing with the vendor portion, I didn't oversee." The RCE added that she did not feel the need to "investigate to

³⁹ The OIG acknowledges that the drink tickets and bus transportation could alternatively be analyzed as improper gifts accepted by individual VA employees in excess of the \$20 gift rule limit. This analysis is complicated by various issues, including that the population of individuals who accepted the transportation and drink tickets is not readily known. In addition, the inclusion of the sponsorships in the official program may have given VA employees the appearance that the sponsored activities had VA's approval. These determinations were not in the scope of the OIG's investigation, which instead focused on the underlying root cause, which was the improper direction given by the senior executive in charge of the symposium.

say why we can't do it" because it was her understanding that Ms. Dawson had "validated" the acceptance of sponsorships "through leadership in contracting."

The OIG found that the RCE, who served in the same capacity in 2019, should not have relied on representations from Ms. Dawson and a member of the contracting team for two reasons. First, the conference policy required the RCE to specifically consult the OGC Ethics Specialty Team about any "proposed gift(s)." Second, the guidance from others was either qualified—based on application of VA policy that the RCE did not fully review—or came from "hearsay," in the form of conversations between Ms. Dawson and unidentified "peers at her level." The OIG found the latter basis particularly problematic because Ms. Dawson misrepresented to the RCE what the associate executive director of the Strategic Acquisition Center told her.

Ms. Dawson told investigators that she consulted the associate executive director to inquire whether he had advice for potential sponsorships of symposium events. Ms. Dawson said she recalled the associate executive director advising her that it was permissible to have sponsors. She could not recall whether she specifically asked about happy hours. The associate executive director also told investigators that Ms. Dawson said she wanted to provide social events at the symposium, but they weren't able to "put it on the contract." He told investigators that he suggested Ms. Dawson consider a "pay-as-you-go" event, with no sponsorship, which meant that a sponsor might host an event at a bar but VA employees would pay for their own drinks. He added that he told Ms. Dawson, "Vendors do this all the time. They sponsor an event. We just have to be very careful about how we handle it. So if they're going to give anything away, you want to be really wary of that . . . you don't want to give the perception that anyone is getting some sort of free access and/or somehow giving a gift to the government." The associate executive director told OIG investigators that he specifically told Ms. Dawson that a sponsor should not be "paying for a big open bar and investing thousands of dollars . . ."

Finding 1 Conclusion

The OIG determined that Ms. Dawson accepted multiple gifts, with a total value of over \$2,700, from the conference center during two visits in 2023: the first in February 2023, while she was leading a site visit to evaluate the conference center as a potential symposium site, and the second in July and August 2023, when she was organizing and leading the symposium. In addition, Ms. Dawson improperly directed the RCE to solicit and accept sponsorships for happy hours and event transportation that were not within VA's authority to accept. The OIG found that Ms. Dawson knew these solicitations of sponsorships were improper. The OIG also found that the RCE failed to consult the OGC Ethics Specialty Team regarding the sponsorships, as VA's conference policy required.

Finding 2: Ms. Dawson Discouraged Her Executive Assistant from Seeking Ethics Advice on Gifts and Sponsorships

The Department of Veterans Affairs Accountability and Whistleblower Protection Act of 2017 requires that VA establish performance criteria for all supervisory employees that “promotes the protection of whistleblowers.”⁴⁰ The criteria were required to include “the degree to which supervisory employees respond constructively when employees of the Department report concerns, take responsible action to resolve such concerns, and foster an environment in which employees of the Department feel comfortable reporting concerns to supervisory employees or to the appropriate authorities.”⁴¹ As with all VA supervisors and managers, Ms. Dawson’s performance plan for fiscal year 2023 included the whistleblower criteria as a mandatory performance requirement. In addition, VA policy requires that members of the senior executive service “foster high ethical standards in meeting the organization’s vision, mission, and goals.”⁴² The Office of Personnel Management notes that a fundamental competency of a government senior executive is integrity and honesty.⁴³ This requires that the executive “behaves in an honest, fair, and ethical manner” and “models high standards of ethics.”⁴⁴ As discussed below, the OIG found that Ms. Dawson did not respond appropriately to her executive assistant’s ethical concerns about the symposium or encourage her to follow through on her proposal to seek guidance from OGC. Accordingly, the OIG found that Ms. Dawson’s conduct was not consistent with requirements that she promote the protection of whistleblowers and that she failed to model and foster high ethical standards for her executive assistant.

Ms. Dawson Did Not Foster an Environment in Which Her Executive Assistant Could Raise Concerns

Before the site visit to the conference center and in the months prior to the symposium, Ms. Dawson’s executive assistant raised questions about potential gifts from the conference center and either sought or suggested to Ms. Dawson that she request ethics advice. In some instances, Ms. Dawson did not respond to the executive assistant’s messages. Other times, Ms. Dawson’s response failed to address the executive assistant’s concerns. The executive assistant told investigators Ms. Dawson was also generally critical of her cautious approach to ethics issues.

⁴⁰ Department of Veterans Affairs Accountability and Whistleblower Protection Act, P.L. 115-41 § 102 (2017); 38 U.S.C. § 732.

⁴¹ Department of Veterans Affairs Accountability and Whistleblower Protection Act, P.L. 115-41 § 102 (2017); 38 U.S.C. § 732.

⁴² VA Handbook 5027, *Senior Executive Service*, Part III, app. A, April 15, 2002.

⁴³ Office of Personnel Management, *Guide to Senior Executive Service Qualifications*, at 5 (September 2012).

⁴⁴ Office of Personnel Management, *Guide to Senior Executive Service Qualifications*, at 5 (September 2012).

Before the site visit in February 2023, the executive assistant reminded Ms. Dawson that the conference center asked about “what we can and cannot accept during the site visit.” The executive assistant told investigators she could not recall the details of that discussion, but it did prompt her to consult an OGC ethics counselor. The executive assistant provided the ethics counselor’s advice—“Generally, you should accept nothing”—to Ms. Dawson. According to the executive assistant, Ms. Dawson did not reply to the email or discuss the issue with the executive assistant.

Several months later, Ms. Dawson did not address the executive assistant’s suggestion to consult OGC on another gift issue and instead sent an image of a person holding a stop sign (see figure 1 below). During the site visit, the conference center had informed Ms. Dawson that the Acquisition Academy could designate one “Celebrity Guest” for the symposium for every 200 rooms that VA attendees booked. The conference center would offer such celebrity guests a variety of services, including transportation to and from the airport, a “best in house” room assignment, a “personalized welcome amenity,” and “personal concierge service.” On July 5, 2023, Ms. Dawson forwarded to her executive assistant a message from the conference center’s designated “Celebrity Services Agent,” offering Ms. Dawson “Five (5) complimentary Celebrity designations to be assigned as you see fit to experience our services.”⁴⁵ The conference center employee also invited Ms. Dawson to designate eleven “VIP guests,” who would receive a “priority room assignment” and “a welcome gift in their room.” Below this message from the conference center, Ms. Dawson included lists of VA officials (including herself) that she had designated as celebrity guests, along with eleven VIP guests, which included VA senior executives, staff of the Acquisition Academy, and symposium speakers.

The executive assistant responded to Ms. Dawson’s email:

The VIP designation references a gift in the room. Do we know if the gift falls within the allowable threshold (I think \$20)? What is a priority room assignment? We are also identifying members of industry to occupy the rooms. Is that something that can be done? I don’t mean to overthink it, but I am uncomfortable with the celebrity services component without clearance from OGC, etc.

Ms. Dawson replied by email six days later, with the executive assistant’s name followed by the image of the person holding a large stop sign, as shown in figure 1.

⁴⁵ In February 2023, Ms. Dawson received a list of the “celebrity services” the conference center offered to celebrity guests. She did not include the services list when she provided the celebrity and VIP guest designations to her executive assistant and the RCE on July 5, 2023.

To: [REDACTED]
From: Dawson, Judith [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E37D564B0C6F4432BB1A6CAE3CA7E37E-DAWSON, JUD]
Sent: Tue 7/11/2023 12:20:03 AM (UTC)
Subject: RE: No [REDACTED] Upgrades

[REDACTED]



Water and juice will not exceed \$20 bucks!!!

Judith

Figure 1. Image emailed from Ms. Dawson to her executive assistant.

Source: July 11, 2023, email from Ms. Dawson

Ms. Dawson thus responded to her executive assistant's concern about the VIP gift, but did not address her other concerns or her suggestion to seek OGC approval. Ms. Dawson told

investigators she did not know when she sent her email whether the VIP gift actually was “water and juice” or whether VIP guests actually received a gift from the conference center. She said she sent the stop sign image, six days after her executive assistant expressed concerns, because the executive assistant’s “hair is always on fire, and she’ll send me 150 emails when we’re sitting right across from each other.”⁴⁶ The executive assistant told investigators she interpreted Ms. Dawson’s email and graphic as communicating “Stop, enough of you . . . Enough of vetting things.”

Ultimately, the contracting officer told the conference center not to provide VIP snacks or alcoholic beverages to VA employees.⁴⁷ Further, at the time of the symposium, the conference center’s internal notes for the celebrity guests indicated “NO AMENITIES ALLOWED.” However, the OIG found that Ms. Dawson should not have discouraged a direct report from asking questions, expressing discomfort, or consulting OGC about gifts to VA employees, even if a different VA employee ultimately addressed the issue.

The OIG also found that Ms. Dawson’s response to her executive assistant regarding the gift from the conference center reflected a failure to foster an environment in which her executive assistant could express concerns. The executive assistant told investigators, “that stop symbol is essentially how I feel every time I have to vet something.” More generally, the executive assistant said Ms. Dawson called her “skittish” and “afraid of my own shadow” because “I try and make sure that the I’s are dotted and the T’s are crossed, and that is not an appreciated trait of mine.” The executive assistant also explained that there were times when Ms. Dawson accepted warnings or questions about the permissibility of certain actions, but “other times . . . it’s very clear that she is not happy with you.” The executive assistant described being “scared” to ask for guidance about a concern because “then you’ve got to go and say, ‘You know, hey, this can’t happen.’ ” She said, “it’s uncomfortable . . . and then you may be not on a good list for a while.” When asked if she ever decided not to seek guidance for this reason, the executive assistant said “if I feel like [OGC] need to be consulted, I try and figure out a way to make it happen. But it causes sleepless nights. It causes an enormous amount of stress and anxiety trying to have those conversations.” The executive assistant told investigators she did not

⁴⁶ VA timesheets indicate that Ms. Dawson and her executive assistant were not “sitting right across from each other” on the day Ms. Dawson sent the stop sign email, as Ms. Dawson was in her VA office while the executive assistant was teleworking. The OIG also determined that Ms. Dawson’s executive assistant sent her 20 emails in the five working days up to and including the day of Ms. Dawson’s stop sign response, four of which were replies to requests from Ms. Dawson. The executive assistant sent Ms. Dawson no Teams messages during this period. Further, after the stop sign image, Ms. Dawson directly addressed the executive assistant’s concern about the VIP gift, which suggested that the stop sign image was related to the executive assistant’s questions and concerns, not the number of emails the executive assistant had sent.

⁴⁷ The RCE told investigators “Contracting said, well, what does [the conference center] want to give as a gift? They said, a cheese tray, a this, a that, and [the contracting officer] said we can’t accept that.”

take her concerns about the VIP guest designations to OGC “because I was essentially told to stand down.”

Investigators also identified a situation in which the executive assistant consulted OGC but did not complete the process to obtain an opinion. On July 21, 2023, eleven days before the symposium started, the executive assistant emailed the OGC ethics team to ask if the symposium program guide could recognize vendors that would be sponsoring events during the symposium. The assigned ethics attorney identified a concern about whether VA could accept the sponsorships at all, explaining that “There are strict restrictions as to what financial assistance a Federal agency can accept from an outside entity. Please ensure, first, that any funds provided to you do not violate appropriations law. This is important.” The ethics attorney directed the executive assistant to reach out to the district counsel for advice on this issue.

The executive assistant asked to be placed in contact with the appropriate district counsel for her region, and the ethics attorney facilitated this by forwarding the email thread. The district counsel replied and asked the executive assistant for additional information on July 31, 2023, including the terms of the sponsorship, amount of the donation, and identity of the sponsor. The district counsel sent these questions on the same day that sponsored charter buses were scheduled to transport VA employees to a baseball game. The executive assistant replied with a question on a different issue and said she would provide the information about the sponsorships later. However, the executive assistant never provided the information and accordingly the district counsel was unable to opine as to whether the sponsorships were proper.

The executive assistant told investigators she did not respond to the second OGC attorney’s questions because they were “overtaken by events,” and she was concerned about Ms. Dawson’s response: “This would not have been well received if in the nth hour where [Ms. Dawson is] dropping sponsors’ logos into a document and wanting to tell everybody in the world about these activities, if I pressed the brake and stopped it all . . . wow, that would not have been good.”⁴⁸

Finding 2 Conclusion

As part of its efforts to encourage VA employees to report concerns about the department, Congress required VA to include whistleblower protection as a criteria in performance plans for supervisory personnel such as Ms. Dawson. As a member of the senior executive service, Ms. Dawson also had an obligation to model and foster high ethical standards in other VA employees. The OIG found that in at least one instance, Ms. Dawson discouraged her executive assistant from raising ethical questions and concerns regarding the symposium and from seeking guidance from OGC. The executive assistant told investigators that she was “scared” and anxious about seeking guidance regarding the symposium because of Ms. Dawson’s words and actions,

⁴⁸ The executive assistant explained that the document Ms. Dawson was “dropping them”—sponsors’ logos—into was the symposium program guide.

which also prevented her from consulting OGC about extra benefits for certain symposium attendees and from responding to OGC's questions about sponsorships of employee events during the symposium. Thus, the OIG found that Ms. Dawson's actions were not consistent with performance criteria for supervisors to foster an environment in which VA employees could express concerns. Ms. Dawson also failed to model or foster high ethical standards for her executive assistant.

Finding 3: Ms. Dawson Failed to Disclose Gifts from the Conference Center on Her 2023 Annual Public Financial Disclosure

Certain groups of senior federal employees are required to file annual public financial disclosure reports.⁴⁹ The Office of Government Ethics, which interprets federal ethics laws and regulations, explained the requirement's purpose:

Transparency is a critical part of government ethics, and Congress has determined that the citizens should know their leaders' financial interests. To facilitate such transparency, Congress enacted the financial disclosure provisions of the Ethics in Government Act. The Act imposes detailed requirements for public financial disclosure by senior United States Government officials.

Federal employees filing these public financial reports must disclose, among other transactions, certain high-value gifts from a single source. When Ms. Dawson was appointed to the senior executive service in August 2022, she became subject to these requirements, and she filed a new entrant public financial disclosure report, followed by an annual report for calendar year 2023. However, the OIG found that when Ms. Dawson filed her 2023 public financial disclosure, she failed to report gifts of spa services she received from the conference center just before and during the symposium in July and August 2023, and thus did not comply with the statutory reporting requirement.

Ms. Dawson filed her public financial disclosure report for calendar year 2023 on June 14, 2024. The report includes a section for "Gifts and Travel Reimbursements," with instructions stating that "[t]his section discloses . . . [g]ifts totaling more than \$480 that the filer . . . received from any one source during the reporting period."⁵⁰ Ms. Dawson indicated "None" in the section requiring disclosure of reportable gifts.

⁴⁹ 5 U.S.C. § 13103(a), (f)(3).

⁵⁰ When calculating the total value of gifts received from any one source during the reporting period, filers are not required to aggregate gifts with a value of \$192 or less. For example, according to the Office of Government Ethics' public financial disclosure guide, if a filer receives gifts from one source in a calendar year that have values of \$290, \$225, and \$25, the first two gifts must be aggregated and reported, as each gift exceeds the \$192 aggregation threshold and their total value of \$515 exceeds the \$480 reporting threshold. The \$25 gift is below the aggregation threshold of \$192, so it is not included in aggregated gift total and the filer is not required to disclose it.

As discussed in Finding 1, Ms. Dawson received various gifts from the conference center during a February 2023 site visit and in late July and early August 2023 while at the symposium. Under the financial disclosure regulations, Ms. Dawson was not required to report meals she received during the site visit.⁵¹ However, Ms. Dawson should have reported the spa services she received from the conference center just before and during the symposium. Those services were valued at \$259, \$708, and \$1,148.⁵² Each gift exceeded the \$192 threshold for aggregation, and the total value of the gifts—\$2,115—exceeded the \$480 reporting threshold.

Finding 3 Conclusion

Ms. Dawson was required to disclose the spa services she received from the conference center in July and August 2023 on her 2023 public financial disclosure report. Instead, she indicated that she had no reportable gifts in 2023. The OIG found that Ms. Dawson's failure to satisfy her financial disclosure obligations violated federal law and undermined the purpose of the financial disclosure requirement.

Conclusion

The OIG investigated allegations that Ms. Dawson, while acting as conference leader for the 2023 symposium event, accepted gifts from the conference center that hosted the symposium and solicited or accepted improper sponsorships of symposium events.

The OIG found that Ms. Dawson accepted gifts of free meals, spa services, and merchandise from the conference center, in violation of government ethics rules and the standards of conduct provisions of the FAR. Ms. Dawson initially accepted three free meals from the conference center during a site visit in February 2023, while VA was evaluating the conference center to be the symposium site. The meals were valued at approximately \$272. Ms. Dawson then accepted free services and merchandise from the conference center before and during the symposium, including approximately \$2,436 in spa treatments and merchandise from the spa's gift shop.

Further, Ms. Dawson did not encourage her executive assistant to report and seek guidance on ethical concerns related to the symposium, which was inconsistent with statutorily required whistleblower protection criteria in her executive performance plan. Ms. Dawson also failed to model and foster high ethical standards for her executive assistant, contrary to requirements for members of the senior executive service.

⁵¹ 5 C.F.R. § 2634.105(h)(4).

⁵² The OIG found that Ms. Dawson accepted the gift of a massage for the RCE, but the RCE was the actual recipient of the massage. The OIG thus did not find that Ms. Dawson was required to report the value of the massage for the RCE on her financial disclosure. Ms. Dawson also received merchandise from the conference center's spa on one occasion, valued at \$88. Those goods were valued below \$192, and thus Ms. Dawson was not required to report them on her public financial disclosure report.

In addition, Ms. Dawson improperly directed the RCE for the symposium to solicit and accept sponsorships from trade associations and private companies, some with VA contracts, to pay for social activities at the symposium. Ms. Dawson's direction to solicit and accept these gifts violated VA policy because the social activities primarily benefited VA employees rather than veterans and the sponsorships raised ethical concerns about preferential treatment and privileged access for certain sponsors. The RCE also failed to consult the OGC Ethics Specialty Team regarding the sponsorships, as VA's conference policy required.

Finally, the OIG found that Ms. Dawson was required to report the spa services she received from the conference center as gifts on her 2023 annual public financial disclosure report but did not do so.

Ms. Dawson retired from VA in August 2024. As a result, the OIG makes no recommendations with respect to possible administrative action against her. However, the OIG recommends that VA determine whether any additional steps need to be taken regarding Ms. Dawson's 2023 public financial disclosure based on the findings of this report. The OIG also made two recommendations regarding other VA employees, including considering whether additional training or other measures are necessary with respect to their acceptance of free meals from the conference center during the site visit and with respect to the improper solicitation of industry sponsorships of symposium events.

Recommendations

1. The principal executive director of the Office of Acquisition, Logistics, and Construction considers whether any additional training or other measures are necessary with respect to reporting the wrongdoing of a supervisor and the acceptance of free meals and drinks by VA employees during the February 2023 site visit.
2. The principal executive director of the Office of Acquisition, Logistics, and Construction determines whether any additional guidance, training, or oversight is needed with respect to ensuring VA employees do not improperly solicit sponsorships for VA events that do not primarily benefit veterans.
3. VA's designated agency ethics official determines whether any additional steps need to be taken in connection with Ms. Dawson's 2023 public financial disclosure based on the findings of this report.

VA Comments and OIG Response

VA's chief acquisition officer, who also serves as principal executive director of the Office of Acquisition, Logistics, and Construction, along with VA's acting general counsel, who also serves as the designated agency ethics official, reviewed the draft report and concurred with the OIG's three findings and related recommendations. Their full responses are published as appendixes B and C, respectively. The OIG acknowledges that VA provided acceptable action plans and completion timelines in response to the recommendations and will monitor their progress until sufficient documentation has been received to close them as implemented.

Appendix A: Scope and Methodology

Scope

The OIG Office of Special Reviews conducted this administrative investigation from October 2023 through September 2024 to determine whether Ms. Dawson violated federal ethics rules, VA policy, or financial disclosure requirements in connection with the 2023 Acquisition Workforce Innovation Symposium.

Methodology

The investigative team interviewed 20 current and former VA employees, including Ms. Dawson, the former Chancellor of the VA Acquisition Academy. The investigative team also interviewed two non-VA witnesses. The investigative team issued one document subpoena and one document request to third parties. The investigation included a review of more than 5,000 documents, including email messages and attachments; invoices; contracting documents; and purchase card, personnel, and training records. The team also reviewed applicable laws, regulations, and VA policy.

Scope Limitation

The OIG reviewed allegations of misconduct regarding the 2023 symposium and associated contracting and planning activities but did not collect or review evidence concerning prior symposium events.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Investigations*.

Appendix B: Principal Executive Director, Office of Acquisition, Logistics, and Construction and Chief Acquisition Officer Comments

Department of Veterans Affairs Memorandum

Date: July 9, 2025

From: Principal Executive Director, Office of Acquisition, Logistics, and Construction (003) and Chief Acquisition Officer

Subj: Office of Inspector General (OIG) Draft Report: Department of Veterans Affairs VA Acquisition Academy - Former Acquisition Academy Executive Violated Ethical Standards and VA Policy Administrative Investigation

To: Inspector General (50)

1. The Office of Acquisition, Logistics, and Construction submits the attached draft responses for recommendations 1 and 2 of the subject OIG draft report. Note, the Office of General Counsel will prepare the response to recommendation 3 and submit it to OIG.

<i>The OIG removed point of contact information prior to publication.</i>

(Original signed by)

Phillip W. Christy

Attachment

Attachment

**PRINCIPAL EXECUTIVE DIRECTOR, OFFICE OF ACQUISITION, LOGISTICS, AND
CONSTRUCTION AND CHIEF ACQUISITION OFFICER
ACTION PLAN**

**Former Acquisition Academy Executive Violated Ethical Standards and VA Policy
Administrative Investigation, Project Number 2023-03768-SR-0005**

Recommendation 1. The Principal Executive Director of the Office of Acquisition, Logistics, and Construction considers whether any additional training or other measures are necessary with respect to reporting the wrongdoing of a supervisor and the acceptance of free meals and drinks by VA employees during the February 2023 site visit.

Comments: Concur. The Principal Executive Director (PED), OALC takes whistleblower protection very seriously. While discussed as a part of annual training, in town halls and in one-on one session, the PED will formally reiterate, in writing, his expectations for accountability and adherence to ethical standards and VA policy in public or contractor engagement. Additionally, the planned memorandum will remind OALC employees of their protections under the law when reporting agency wrongdoing or misconduct.

Status: In progress.

Target Completion Date: September 30, 2025.

Recommendation 2. The Principal Executive Director of the Office of Acquisition, Logistics, and Construction determines whether any additional guidance, training, or oversight is needed with respect to ensuring VA employees do not improperly solicit sponsorships for VA events that do not primarily benefit veterans.

Comments: Concur. In addition to requiring documented completion of the Responsible Conference Executive (RCE) Certification as part of the conference package, the PED, OALC plans to direct, in writing that the first senior executive in the RCE leadership chain complete the training and report his/her oversight activities to OALC leadership within 10 days following the conference.

Status: In progress.

Target Completion Date: September 30, 2025.

Recommendation 3. VA's designated agency ethics official determines whether any additional steps need to be taken in connection with Ms. Dawson's 2023 public financial disclosure based on the findings of this report.

Comments: OALC defers to the Office of General Counsel.

Appendix C: Acting General Counsel and Designated Agency Ethics Official Comments

Department of Veterans Affairs Memorandum

Date: July 8, 2025

From: Danielle A. Runyan, Acting General Counsel, Designated Agency Ethics Official

Subj: Draft OIG Report, Abuse of Authority and Ethical Violations by Former Acquisition Academy Executive, Project Number 2023-03768-SR-0005

To: Amanda B. Kostner, Supervisory Investigative Attorney, Office of Inspector General

1. The VA Office of Inspector General (OIG) has requested a written response to the finding and recommendation addressed to the Designated Agency Ethics Official in "Draft OIG Report, Abuse of Authority and Ethical Violations by Former Acquisition Academy Executive, Project Number 2023-03768-SR-0005." This memorandum constitutes my concurrence with both Finding 3 and Recommendation 3. Additionally, I offer my overall concurrence with OIG's interpretation and application of the Standards of Conduct throughout the report.

2. I concur with Finding 3, that Ms. Dawson Failed to Disclose Gifts from the Conference Center on her Annual Public Financial Disclosure Report 2024 for Calendar Year 2023.

3. I concur with Recommendation 3, that I determine additional steps to be taken in connection with Ms. Dawson's Annual Public Financial Disclosure Report 2024 for Calendar Year 2023.

4. Additional steps. Upon Finding 3 of the OIG report being finalized, I direct the Ethics Specialty Team to amend Ms. Dawson's Annual Public Financial Disclosure Report 2024 for Calendar Year 2023 to reflect the unreported gift from the conference center, valued at \$2,115. Ms. Dawson's Annual Report 2024 for Calendar Year 2023 was completed and certified in the electronic filing system and cannot be edited. Therefore, a memorandum annotating the amendment will be added to the electronic filing system, making clear it is an amendment to the original report that the report, as amended, meets the criteria for certification.

(Original signed by)

Danielle A. Runyan

Attachment

Attachment

**The Office of General Counsel Ethics Specialty Team
ACTION PLAN**

**Former Acquisition Academy Executive Violated Ethical Standards and VA Policy
Administrative Investigation, Project Number 2023-03768-SR-0005**

Recommendation 1. The Principal Executive Director of the Office of Acquisition, Logistics, and Construction considers whether any additional training or other measures are necessary with respect to reporting the wrongdoing of a supervisor and the acceptance of free meals and drinks by VA employees during the February 2023 site visit.

Comments: OGC defers to the Office of Acquisition, Logistics, and Construction [OALC].

Recommendation 2. The Principal Executive Director of the Office of Acquisition, Logistics, and Construction determines whether any additional guidance, training, or oversight is needed with respect to ensuring VA employees do not improperly solicit sponsorships for VA events that do not primarily benefit veterans.

Comments: OGC defers to the Office of Acquisition, Logistics, and Construction [OALC].

Recommendation 3. VA's designated agency ethics official determines whether any additional steps need to be taken in connection with Ms. Dawson's 2023 public financial disclosure based on the findings of this report.

Comments: Concur. The Office of General Counsel Ethics Specialty Team concurs Ms. Dawson failed to disclose gifts from the Conference Center on her Annual Public Financial Disclosure Report 2024 for Calendar Year 2023.

Status: Upon finalization of the OIG report, the Designated Agency Ethics Official has directed Ms. Dawson's Annual Public Financial Disclosure Report 2024 for Calendar Year 2023 be amended to reflect the unreported gift.

OIG Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
Primary Contributors	Amanda Kostner David Hendrickson Samantha Rayborn
Other Acknowledgments	Kamal Al-Salihi Domingo Alvarez Christopher Bader Nat Grossman Lisette Howells Nate Landkammer Khaliah McLaurin Sabrina Morris Leanne Watkins Matt Ward Rashiya Washington

Report Distribution

VA Distribution

Office of the Secretary
Veterans Health Administration
Assistant Secretaries
General Counsel

Non-VA Distribution

House Committee on Veterans' Affairs
House Appropriations Subcommittee on Military Construction, Veterans Affairs,
and Related Agencies
House Committee on Oversight and Government Reform
Senate Committee on Veterans' Affairs
Senate Appropriations Subcommittee on Military Construction, Veterans Affairs,
and Related Agencies
Senate Committee on Homeland Security and Governmental Affairs
National Veterans Service Organizations
Government Accountability Office
Office of Management and Budget

OIG reports are available at www.vaoig.gov.