



December 17, 2025

The Honorable Rand Paul  
Chairman  
Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, DC 20510

The Honorable Gary Peters  
Ranking Member  
Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, DC 20510

Dear Chairman Paul and Ranking Member Peters:

I write on behalf of the U.S. Office of Government Ethics (OGE) to submit the agency's report on its successful compliance with subchapter II of the Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act" or "Act"). I am pleased to report that OGE completed all activities required for non-Chief Financial Officer (CFO) Act agencies and made significant progress on improving data validity and data security and privacy, in addition to collecting and analyzing data and making data available to the public.

As noted above, in 2025, OGE met all non-CFO Act agency requirements. Specifically, OGE employed a Chief Data Officer, maintained a Data Governance Board, which met regularly, and participated in Chief Data Officer Council meetings. OGE timely complied with the requirements of *M-25-05: Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance* which included the publication of OGE's [Open Data Plan](#).

OGE's progress in the areas of data validity, data security and privacy, data collection and analysis, data availability and visualization are detailed below.

### *Data Validity*

OGE continued to focus on data validity in 2025 by taking specific steps to promote data quality in its largest executive branch-wide data collection: the Annual Agency Ethics Program Questionnaire (questionnaire). Specifically, OGE took the following steps to improve the quality of data it receives: 1) provided an advance copy of the questionnaire to agencies so that agencies had ample time to prepare complete and accurate responses; 2) automated validation in the survey tool so that invalid responses were flagged and agencies were required to correct the errors before submission; 3) analyzed certain agency responses and followed up on potential data entry errors, misunderstanding of the questions asked, failure to provide required information, and failure to provide clear and responsive explanations; and 4) provided agencies with the



ability to pull accurate data directly from OGE's executive branch-wide public financial disclosure system, *INTEGRITY*.

### *Data Security and Privacy*

OGE maintained its strong data security and privacy practices in 2025. Specifically, OGE required all employees to complete annual privacy and security training and required privacy role-based training for all supervisors, managers, and information technology professionals with enhanced access to agency information systems. OGE also continued to actively use its Privacy Threshold Analysis (PTA) process, the agency's primary tool for ensuring that privacy considerations are integrated throughout the data life cycle. OGE requires a PTA to be completed before staff can develop, procure, or modify any information system. OGE's Privacy Officer reviews each PTA to identify whether the system contains personal information and, if so, what controls are required to protect it. The Privacy Team then works with OGE's Information Technology Division and/or the system owners to implement the necessary controls. This process resulted in the review of nearly 30 new or existing information systems in calendar year 2025.

Notably, OGE's Privacy Team drafted or revised seven new Privacy Impact Analyses. Moreover, OGE enhanced its Privacy program by shifting to a team approach for administering the program more holistically and efficiently. Specifically, OGE expanded its Privacy Team to include: 1) the Privacy Officer who is primarily responsible for OGE's Privacy program; 2) an attorney who provides interpretive guidance on the Privacy Act and legal support on privacy matters; 3) an IT employee who provides support with the increasing intersection of privacy and information technology; and 4) an *INTEGRITY* team member who ensures that privacy considerations are contemplated in the maintenance and enhancements to OGE's executive branch-wide electronic financial disclosure system.

### *Data Collections and Analysis*

In 2025, OGE continued to collect and analyze data. For example, OGE conducted its annual survey of ethics practitioners across the executive branch to seek input about their satisfaction with certain resources provided by OGE. OGE also conducted its annual User Satisfaction Survey on *INTEGRITY*, OGE's web-based system for public financial disclosure reports. OGE continued to seek feedback on its professional development offering for ethics officials through course evaluations. Responses to these two surveys and course evaluations help OGE to better understand what it is doing well and where adjustments need to be made to better serve the ethics community. OGE also continued to use an evidence-based approach to its advisory formulation process. By using a variety of data sources to inform the topics of its written guidance, OGE can better mitigate risk and serve executive branch officials through its advisories.

*Data Availability and Visualization*

In 2025, OGE continued to make data available on its website. For example, OGE provides links to each agency's response to the Annual Agency Ethics Program Questionnaire, as well as a summary report compiling the responses from all executive branch agencies. OGE also maintains a searchable/sortable table of individual ethics documents that are available for the public to request.

OGE enhanced data availability and visualization in 2025. For example, prior to 2025, OGE posted static dashboards displaying the number of open program review recommendations at the end of each quarter and the number of referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes. In 2025, OGE relaunched both of these data sets as dynamic dashboards that update weekly. A first for OGE, these new dashboards allow website users to interact with the dashboard of their choice and filter the data by fiscal year. In addition, for the first time, OGE publicly posted [key information and data](#) about the nominee financial disclosure review process including during and after the period of a Presidential Transition.

Thank you for reviewing this report of OGE's recent actions under the Evidence Act. If you have any questions, please feel free to have your staff contact me at 202-482-9311 or [mzbaig@oge.gov](mailto:mzbaig@oge.gov), or Grant Anderson of OGE's Legislative Affairs staff, at 202-482-9318 or [grant.anderson@oge.gov](mailto:grant.anderson@oge.gov).

Sincerely,

Mirza Baig  
Chief Data Officer