

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Office of National Drug Control Policy (ONDCP)

Follow-up to OGE Report Number: 22-62I

Report No.: 24-29IF

Date: March 14, 2024

**UNITED STATES OFFICE OF
GOVERNMENT ETHICS**Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Office of National Drug Control Policy (ONDCP) ethics program, the Office of Government Ethics (OGE) issued seven recommendations in its September 2022 inspection report. OGE recently conducted a follow-up review to assess whether ONDCP had taken sufficient action to resolve the deficiencies underlying the recommendations. The results of our follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Update the agency's written procedures for confidential financial disclosure to remove the reference of the OGE Optional Form 450-A.	During the follow-up review, OGE examined ONDCP's updated written procedures for confidential financial disclosure and found no reference to the OGE Optional Form 450-A.	Closed
2	Update ONDCP's written procedures for issuing notices to prospective employees by including the standard formal job offer template within the document. Ensure that these procedures indicate the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c).	During the follow-up review, OGE examined ONDCP's updated written procedures for issuing notices to prospective employees and found them to include the standard formal job offer template within the document. The procedures also indicated that the updated procedures were reviewed and approved by the DAEO as required by 5 C.F.R. § 2638.303(c).	Closed
3	Establish written procedures for issuing notices to new supervisors. Ensure that these procedures include the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.306(d).	OGE examined ONDCP's written procedures for issuing notices to new supervisors and found them to comply with content requirements. The procedures, which were also a part of the procedures for issuing notices to prospective employees, indicated that the written procedures were reviewed and approved by the DAEO as required by 5 C.F.R. § 2638.306(d).	Closed
4	Upon review of the training slides used to conduct initial ethics training, OGE found that ONDCP did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them.	OGE examined the training slides from ONDCP's October 2023 initial ethics training and found a training slide that included a link to an appropriate summary of the standards of conduct.	Closed

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5	Update ONDCP's written procedures governing new employee onboarding by prominently addressing ONDCP's initial ethics training process.	OGE found a reference to ONDCP's initial ethics training process within the agency's updated written procedure governing the issuance of notices to prospective employees. According to these procedures, as part of the onboarding process, the Office of Operations is now responsible for ensuring that all new employees receive initial ethics training within 90 days of the employee's start date. The Office of General Counsel will track the employees' initial ethics training completion.	Closed
6	Ensure a means of verifying that initial ethics training at ONDCP is received.	OGE examined ONDCP's initial ethics training spreadsheet for initial training conducted in 2022, which identified that six new ONDCP employees received the required training within the required 90-day timeframe.	Closed
7	Upon review of the training slides used to conduct annual training, OGE found that ONDCP did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them.	According to ethics officials, the Office of Administration (OA), a central component of the Executive Office of the President, handled ONDCP's annual ethics training in 2022. OA provided two live ethics training sessions to ONDCP employees to accomplish the training requirement. OA developed the training slides, but ONDCP ethics officials could not share them as part of this follow-up since they are protected under the Presidential Records Act. OGE examined instead the annual ethics training notification email sent to all ONDCP employees, which included a link to the standards of conduct.	Closed

Based on the results of OGE's follow-up review, OGE is closing all seven recommendations.