

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Equal Employment Opportunity Commission (EEOC)

Follow-up to OGE Report Number: 19-40I

Report No.: 21-03IF

Date: December 15, 2020

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

As a result of its inspection of the Equal Employment Opportunity Commission (EEOC) ethics program, the Office of Government Ethics (OGE) issued one recommendation in its September 2019 inspection report. OGE conducted a follow-up inspection in 2020 to assess whether EEOC had taken sufficient action to resolve the deficiency underlying this recommendation. The results of our follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	RECOMMENDATION: Ensure that new entrant confidential financial disclosure reports are filed timely.	<p>The EEOC has 15 district offices throughout the United States. According to EEOC ethics officials, it is difficult to track personnel who are detailed, promoted, or assigned to field offices that require the incumbent to file a confidential financial disclosure report. District Office Directors (DOD) have the authority to detail, hire, and promote personnel into these covered positions. Personnel actions are communicated to the ethics office only after the fact. Additionally, some details are informal and are not documented through the Office of Chief Human Capital Officer (OCHCO).</p> <p>EEOC ethics officials have taken the following steps to address the late filing of new entrant reports:</p> <ul style="list-style-type: none">• Ethics officials remind DODs and District Resource Managers (DRM) during annual ethics training and EEOC Office of Field Programs monthly teleconferences that, when an individual is appointed to a covered position, the DOD or the DRM must ensure that the employee is given the information necessary to timely file a new entrant confidential report within 30 days of assuming the position.• OCHCO now notifies the ethics office when it learns there has been a personnel action involving a covered position.	Open

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	OGE reviewed agency collected data for the 14 new entrant confidential financial disclosure reports filed between July 2019 and September 2020 and found that only 50% of the reports were filed timely.	
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Based on the results of OGE's follow-up inspection, the recommendation remains open. OGE will conduct an additional follow-up review in approximately 12 months to assess whether the EEOC has taken sufficient action to resolve the deficiency underlying the recommendation.