

U.S. OFFICE OF  
GOVERNMENT  
ETHICS

RESULTS FROM THE  
**ANNUAL**  
AGENCY ETHICS  
PROGRAM  
QUESTIONNAIRE  
CY24

A  
**SNAPSHOT**  
OF THE EXECUTIVE  
BRANCH ETHICS  
PROGRAM

# Table of Contents

Section 1 – Introduction.....	2
Legal Requirement.....	2
Topics Covered.....	2
Changes to the Questionnaire .....	3
Methodology.....	3
Agency Response Rate .....	4
Data Limitations .....	4
Section 2 – Key Highlights.....	5
Ethics Officials & Resourcing.....	5
Financial Disclosure.....	6
Education & Training.....	7
Advice & Counsel .....	8
Special Government Employees .....	9
Enforcement .....	9
Ethics Pledge (Executive Order 13989).....	10
Section 3 – Compilation of Agency Responses.....	13
APPENDIX.....	44

## Section 1 – Introduction

The United States Office of Government Ethics (OGE) leads and oversees the executive branch ethics program designed to prevent financial conflicts of interest.

Every year, each agency within the executive branch is required to submit to OGE a response to the Annual Agency Ethics Program Questionnaire (questionnaire). Each questionnaire response provides a snapshot of that agency’s ethics program. In the aggregate, the responses also provide a picture of the executive branch ethics program as a whole.

OGE uses the questionnaire to conduct oversight of each agency’s ethics program and uses the resulting data to report on the executive branch ethics program to stakeholders, including the public, Congress, and the ethics community. OGE also uses the data to make informed decisions about its priorities and allocation of resources.

This report combines and summarizes the 143 agency responses for calendar year 2024. Each agency’s response is available on OGE’s website in the [Agency Ethics Documents Search Collection](#).

### ***Legal Requirement***

Executive branch agencies are required to submit an annual report to OGE pursuant to the Ethics in Government Act of 1978, as amended.<sup>1</sup> OGE collects the required report via the questionnaire.<sup>2</sup>

### ***Topics Covered***

OGE uses the questionnaire to collect information about the following aspects of each agency’s ethics program. The compilation is organized by these topics:

- Ethics Program Resources and Administration
- Ethics Education and Training
- Advice, Counseling, and Remedies
- Financial Disclosure Program Management and Electronic Filing Systems
- Public Financial Disclosure
- Confidential Financial Disclosure
- Enforcement of the Standards of Conduct and Criminal and Civil Statutes

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<sup>1</sup> See 5 U.S.C. § 13122(e)(1).

<sup>2</sup> See 5 C.F.R. § 2638.207.

- Ethics Pledge (contained in Executive Order 13989)
- Special Government Employees

## ***Changes to the Questionnaire***

In the 2024 questionnaire, OGE added one new question and substantively modified two questions:

Q12 includes a new response option, “Evaluation has not been completed” to provide a wider range of answer choices.

Q27 asks a new question about the number of Legal Expense Fund documents filed and sent to OGE.

Q46 includes a new response option to include Subpart J of the Standards of Conduct (relating to Legal Expense Funds and the acceptance of pro bono legal services for certain legal matters).

OGE also made a few non-substantive changes. These changes improved clarity and diminished ambiguities. OGE gave advance notice of these changes through its [Program Advisory 24-04](#), which included a red-line version of the edits.

## ***Methodology***

The questionnaire covered agency ethics program activities that occurred in calendar year 2024. OGE provided an [advance copy of the questionnaire](#) to every Designated Agency Ethics Official in July 2024. OGE opened the survey on December 30, 2024, and agency responses were due on February 3, 2025.<sup>3</sup>

OGE allowed only one response per agency; accordingly, each agency’s response reflects the data for the entire agency, including agency components.

OGE used a custom application to collect each agency response. OGE followed up with individual agencies based on a pre-determined set of selection criteria, including large changes from the previous year’s response, internal inconsistencies within an agency’s response, and narrative responses that were unclear or incomplete.

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<sup>3</sup> See 5 C.F.R. § 2638.207(a).

## Agency Response Rate

Response rate: 100%

There were 143 agencies for purposes of the questionnaire in 2024. All 143 agencies responded.

The term “agency” refers to every entity that has a Designated Agency Ethics Official (DAEO).<sup>4</sup> The Department of Defense (DoD) and the White House have multiple DAEOs because they appoint a DAEO to run the ethics program at the individual office or component level. OGE treats each of these DoD components and White House offices as distinct ethics programs and requires a separate response to the questionnaire from each.

## Data Limitations

When reviewing this report, it is important to keep in mind the following data limitations:

- OGE does not independently verify the information submitted by each agency. However, based on a set of criteria, OGE reviews agency responses for anomalies and, when necessary, requests clarifications from the agencies.
- Agency ethics officials may interpret the questions differently.
- The aggregate number for certain questions may be higher than reported, due to the exclusion of classified information.<sup>5</sup>
- OGE’s primary method for conducting oversight of agency ethics programs is through program reviews. OGE reviews agency ethics programs to identify and report on the strengths and weaknesses of the programs by evaluating (1) agency compliance with ethics requirements established in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. The questionnaire serves as an input and is one of many data sources used to inform the program review. Reports summarizing the results of these program reviews are available on OGE’s website.

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<sup>4</sup> See 5 C.F.R. § 2638.104(a).

<sup>5</sup> Questions 2, 16-17, 20, 35-39, 43-45, 58-59.

## Section 2 – Key Highlights

This section provides key highlights from the aggregated responses of the 143 agencies that responded for calendar year 2024.<sup>6</sup> The highlights focus on key aspects of the ethics program, including: ethics officials and resourcing; financial disclosure; education and training; advice and counsel; special Government employees, enforcement, and the Ethics Pledge (Executive Order 13989).<sup>7</sup>

### **Ethics Officials & Resourcing**

The executive branch ethics program is decentralized and relies on officials in each of the 143 agencies to carry out a compliant program for the employees of their agency.<sup>8</sup> According to the 2024 questionnaire responses, more than 8,300 employees across the country supported the ethics program, either through substantive work, such as reviewing financial disclosures, or through administrative support, such as providing human resources or information technology services.

The Designated Agency Ethics Official (DAEO) is the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE.<sup>9</sup> The questionnaire responses show that in 2024 most DAEOs (86%) were career employees. **Although 59% of DAEOs had spent less than five (5) years in their current positions, 67% had five (5) or more years of ethics experience.** Seventy-six percent (76%) of DAEOs spent less than 25% of their time on ethics. ([See Q3](#))

Of the other employees supporting the ethics program, **949 (11%) individuals performed ethics duties close to full time (31 to 40 hours a week).** The remaining 89% of employees supporting the ethics program worked on ethics anywhere from one (1) to 30 hours per week, as part of other responsibilities. Therefore, when accounting for the reported number of hours worked per week by each individual, **2,460 full-time equivalent positions supported the ethics program across the executive branch in 2024.** ([See Q5](#))

Of the 143 agencies required to report, **53 (37%) reported needing more resources.** Agencies

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<sup>6</sup> Percentages represent the aggregate response. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in 100% or more. When calculating percentages, responses of “not applicable” were not included in the denominator.

<sup>7</sup> Executive Order 13989 was rescinded on January 20, 2025. See <https://www.whitehouse.gov/presidential-actions/2025/01/initial-rescissions-of-harmful-executive-orders-and-actions/>

<sup>8</sup> See 5 C.F.R. § 2638.104.

<sup>9</sup> Each agency is required to have a minimum of two ethics officials, the Designated Agency Ethics Official (DAEO) and the Alternate (ADAEO). See 5 C.F.R. § 2638.104(a), (d). Larger agencies may dedicate additional staff to ethics.

most frequently indicated needing additional resources in the area of human capital (44 agencies), followed by technology (36 agencies). ([See Q9](#)) The **agency head met with the ethics staff at 106 (75%) agencies** to discuss the strengths and weaknesses of the ethics program in 2024. ([See Q10](#))

## Financial Disclosure

Disclosure of personal financial interests – such as assets, liabilities, and outside positions – allows ethics officials to help employees assess when personal interests might conflict with government responsibilities. The timely collection, review, and certification of public and confidential financial disclosures helps to ensure that the government’s business is conducted free from conflicts of interest.

### *Filing Compliance*

The 2024 questionnaire results demonstrate a high rate of employee compliance with the filing requirements:<sup>10</sup>

- **More than 99% of those required to file public financial disclosures did so:** 29,383 reports filed out of 29,493 required. ([See Q36](#) and [Q58](#))
- **More than 99% of those required to file confidential financial disclosures did so:** 433,404 reports filed out of 435,503 required. ([See Q43](#) and [Q58](#))

In addition to new entrant, annual, and termination reports, public filers must also report transactions of certain securities as they occur, so that ethics officials can evaluate potential conflicts of interest in close to real time.<sup>11</sup> In 2024, public filers submitted **22,322 periodic transaction reports**. ([See Q38](#))

### *Timeliness of Review and Certification*

Agencies should review reports promptly and must perform a technical review and conflict of interest analysis within 60 days of receiving a report.

- In 2024, agencies reported that they conducted **timely reviews for 93% of the reports certified**. ([See Q37](#), [Q44](#), and [Q59](#))

If no additional information or remedy is required, agencies must also certify the report before the 60-day period expires. However, final certification may necessarily occur later, if the agency needs to seek additional information or to take remedial action.

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<sup>10</sup> For filing requirements, see 5 C.F.R. §§ 2634.201, .903.

<sup>11</sup> See 5 C.F.R. §§ 2634.201(f), .309.

- In 2024, agencies reported that they **certified 89% of reports within 60 days** ([See Q37, Q44, and Q59](#))

### *Public Availability*

Transparency plays an essential role in strengthening trust in government. Agencies must make the financial interests of certain high-level officials publicly available.<sup>12</sup> Without this transparency, the public could not as meaningfully oversee the integrity of its government.

In 2024, agencies reported receiving a total of **943 requests for 11,518 documents under the Ethics in Government Act**. ([See Q41 and Q42](#))

In 2024, **OGE processed additional requests** from the public and the news media to inspect over **12,000 documents under the Ethics in Government Act**, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, Ethics Pledge waivers, and other covered records.

### *Technology*

Agencies continue to use technology to support their financial disclosure programs. As required by regulation, **all 143 agencies used *Integrity*, OGE’s executive branch-wide electronic filing system**, for at least some of their public disclosure reports. In addition, 78 agencies reported using other electronic filing systems for other public and/or confidential reports. ([See Q32](#))

## **Education & Training**

An agency’s ethics education program increases employees’ awareness of their ethical obligations, helps them identify ethics issues that may arise in the work they perform, and provides them with guidance and support for making ethical decisions.

Overall, the results from the questionnaire demonstrate a high rate of employee compliance with the core training requirements ([See Q16, Q17, Q20, and Q57](#)):<sup>13</sup>

- **Ninety-seven percent (97%)** of new Presidentially appointed, Senate-confirmed appointees **timely received their required initial ethics briefing**.

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<sup>12</sup> See 5 C.F.R. § 2634.603.

<sup>13</sup> For training requirements, see 5 C.F.R. pt. 2638, subpt. C.

- **Ninety-five percent (95%) of new employees timely received their required initial ethics training.**<sup>14</sup>
- **Ninety-seven percent (97%) of public and confidential financial disclosure filers received their required annual ethics training.**
- **More than 99% of special Government employees** who were expected to serve for 60 days or less on a board, commission, or committee **received their required initial ethics training** before or at their first meeting.

Forty-three percent (43%) of agencies established additional ethics education requirements, beyond the minimum required by regulation. ([See Q21](#))

In addition, **83%** of agencies **reported assessing risk** to determine the content, format, and/or timing of their ethics education, and **83%** of agencies **reported assessing the effectiveness of their education programs.** ([See Q22](#) and [Q23](#))

## **Advice & Counsel**

The analysis and resolution of conflicts of interests are key to agencies and employees managing and minimizing the risk of ethical failure. A thorough analysis is the first step in ensuring that agencies and employees take appropriate steps to remedy a potential conflict of interest. By resolving potential conflicts before they happen, ethics officials help ensure that their agencies' decisions are made in the public's interest and are not unfairly influenced by personal financial interests. In 2024, **employees most frequently sought ethics guidance on outside employment/activities and financial disclosure reporting.** ([See Q24](#))

All employees must recuse from government matters that affect the financial interest of someone with whom they are seeking employment.<sup>15</sup> Certain senior employees are also required to notify their ethics official in writing when they begin negotiating for employment with a non-federal entity to help ensure that they receive timely advice.<sup>16</sup> In 2024, these **senior officials filed 2,725 notifications regarding negotiations for employment.** ([See Q25](#))

The criminal conflict of interest law at 18 U.S.C. § 208 prohibits an employee from participating in an official capacity in a particular matter in which the employee has a financial interest; however, an agency can issue a waiver of the prohibition in individual cases. In 2024, **agencies issued 177 such waivers to employees (18 U.S.C. § 208 (b)(1)).** In addition, agencies issued **260**

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<sup>14</sup> This excludes Special Government Employees expected to serve less than 60 days on a board, commission, or committee.

<sup>15</sup> See 18 U.S.C. § 208; 5 C.F.R. § 2635.604.

<sup>16</sup> See Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act, Pub. L. No. 112-105, § 17, 126 Stat. 291, 303-04 (2012); 5 C.F.R. § 2635.607.

waivers to special Government employees serving on federal advisory (FACA) committees (18 U.S.C. § 208 (b)(3)). ([See Q26](#))

## **Special Government Employees**

Congress established the special Government employees (SGE) category in 1962 to overcome obstacles in hiring outside consultants, experts, and other temporary employees.<sup>17</sup> A special Government employee (SGE) is an employee expected to perform temporary duties for no more than 130 days during a one (1)-year period.<sup>18</sup> SGEs are covered by most ethics rules, but the application of some of those rules to SGEs is less restrictive than for other employees and permits them to engage in more outside activities.

**Seventy-three (73) agencies** reported **37,748 special Government employees** served during calendar year 2024. The **majority (83%) of SGEs served at four (4) agencies.** ([See Q56](#))

**The vast majority of SGEs are required to file financial disclosure.** Of those required to file, **less than one percent (0.5%) are required to file a public financial disclosure report and more than 99% percent are required to file a confidential financial disclosure report.** Of those required to file:

- **One hundred percent (100%) of those required to file public financial disclosures did so:** 139 reports filed out of 139 required. ([See Q58](#))
- **More than ninety-nine percent (99.7%) of those required to file confidential financial disclosures did so:** 30,711 reports filed out of 30,805 required. ([See Q58](#))

## **Enforcement**

Each agency is responsible for investigating and taking action against an employee who potentially has violated an ethics rule or law.<sup>19</sup> Agencies may take corrective or disciplinary action under applicable Government-wide regulations or agency procedures. If misconduct is potentially criminal, the agency must refer the matter to the Department of Justice.

Thirty-five (35) agencies reported taking **921 disciplinary actions based wholly or in part upon violations of the Standards of Conduct** (multiple actions could be taken against one individual).

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<sup>17</sup> 18 U.S.C. § 202(a).

<sup>18</sup> An individual hired under a temporary appointment can be designated a SGE where the employing agency makes a good-faith estimate that the individual is not expected to serve more than 130 days in the succeeding 1-year period. Under the executive branch's longstanding interpretation, while SGEs are expected to serve no more than 130 days in a one (1)-year period, if an individual was designated a SGE but unexpectedly exceeds the 130 days of service, that person is still considered a SGE for the current year.

<sup>19</sup> See 5 C.F.R § 2638.107(d).

The largest share of disciplinary actions (39%) involved violations of the regulation governing misuse of position. ([See Q46](#))

Nine (9) agencies reported taking 16 disciplinary actions based wholly or in part upon violations of criminal or civil statutes (multiple actions could be taken against one individual). Thirty-eight percent (38%) of those actions were for violations of the primary criminal conflict of interest statute, 18 U.S.C. § 208, which prohibits employees from taking official action that can affect a personal financial interest. ([See Q47](#)) Twenty-two (22) agencies reported a total of sixty-one (61) referrals to the Department of Justice concerning potential violations of the criminal conflict of interest statutes. ([See Q48](#))

Agencies reported that nine (9) public financial disclosure filers were reported to the Attorney General for failure to file. ([See Q40](#))

### **Ethics Pledge (Executive Order 13989)**

*Note: Executive Order 13983 was rescinded on January 20, 2025. Information from calendar year 2024, while Executive Order 13983 was still in effect, is summarized below.*

Executive Order 13989 required certain individuals appointed to an executive branch agency on or after January 20, 2021, to sign an Ethics Pledge (“Pledge”). By signing the Pledge, these appointees committed to additional recusal obligations, post-employment restrictions, and a ban on accepting gifts from lobbyists or lobbying organizations.

#### *Compliance with the Ethics Pledge Signature Requirement*

Agencies reported that 855 full-time, non-career appointees were appointed between January 1, 2024 and December 31, 2024.<sup>20</sup> Of those 855 appointed, 723 were required to sign the Ethics Pledge and 718 (99%) did so.<sup>21</sup> This number includes two (2) appointees who should have signed the Ethics Pledge in 2024, but who instead signed in 2025. ([See Q51](#))

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<sup>20</sup> The following advisories, located on OGE’s website, provide detailed guidance regarding the appointees subject to the Ethics Pledge: OGE Legal Advisory LA-21-07 (June 9, 2021), OGE Legal Advisory LA-21-05 (Feb. 23, 2021), OGE DAEOgram DO-09-003 (Jan. 22, 2009), OGE DAEOgram DO-09-010 (Mar. 16, 2009), and OGE DAEOgram DO-09-020 (May 26, 2009).

<sup>21</sup> The Department of Homeland Security reported that an “employee who onboarded on or about July 2024 was unresponsive to request to file the ethics pledge.” The Department of Labor reported, “Administrative oversight Employee departed agency before discrepancy was caught.” The Farm Credit Administration reported, “Appointee on-boarded mid-December 2024 and ethics paperwork was in the process of being collected. However, Executive Order 14148, dated January 20, 2025, “Initial Rescissions of Harmful Executive Orders and Actions,” revoked the ethics pledge in Executive Order 13989 dated January 20, 2021.” The Office of Management and Budget reported, “One very junior political appointee joined OMB as a Schedule C and departed within 30 days without signing an Ethics Pledge.” The Agency for International Development reported, “The ethics office inadvertently failed to

One-hundred and thirty-two **(132) appointees were not required to sign** for the following reasons ([See Q51](#)):

- Seven (7) were appointed to an exempt, non-policymaking position; and
- One-hundred and twenty-five (125) were appointed without a break in service after serving in another position for which the Pledge had already been signed.

#### *Revolving Door Ban*

Appointees who were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment were required to recuse from certain activities related to their prior lobbying activities.

Of the full-time, non-career appointees in 2024, agencies reported that two **(2) appointees were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior** to their appointment. ([See Q52](#)) Both appointees had an ethics agreement addressing their obligations under paragraph 3 of the Ethics Pledge.

#### *Ethics Pledge Waivers*

Section 1 of the Executive Order required all covered appointees to abide by several commitments in the Ethics Pledge, unless they were granted a waiver under section 3. With the approval of the White House, the Acting Director of the Office of Management and Budget (OMB) designated the Designated Agency Ethics Official as the position at each executive agency to exercise section 3 waiver authority after consultation with the Counsel to the President.<sup>22</sup>

In 2024, **four (4) agencies granted waivers to four (4) individuals**. A single waiver can waive more than one paragraph of the Ethics Pledge. Of the **four (4) waivers, two (2) waived paragraph 2** of the Ethics Pledge and **two (2) waived paragraph 3** of the Ethics Pledge. ([Q53](#))

Generally, paragraph 2 of the Ethics Pledge restricts an appointee's participation in particular matters involving specific parties in which the appointee's former employers or clients have an interest. Paragraph 3 of the Ethics Pledge restricts an appointee from seeking or accepting employment with an executive agency that the appointee lobbied within the two years prior to appointment.

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follow up with the employee to sign the pledge. However, when we attempted to rectify our error, the executive order was revoked by President Trump, negating the issue.”

<sup>22</sup> OGE Legal Advisory LA-21-04 (Feb. 18, 2021).

*Enforcement*

Agencies reported no **violations of the Pledge** and no **enforcement actions**. ([See Q54](#) and [Q55](#))

## Section 3 – Compilation of Agency Responses

For each question, the bold number is the aggregated response for all 143 agencies that responded to the questionnaire. In parentheses is the percentage that the aggregated response represents. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in more than 100% when adding separate percentages. When calculating percentages, responses of “not applicable” were not included in the denominator.

**United States  
Office of Government Ethics**

**2024 AGENCY ETHICS PROGRAM QUESTIONNAIRE**

**PART 1. INTRODUCTION**

Executive branch agencies are required to submit an annual report to the United States Office of Government Ethics (OGE) concerning certain aspects of their ethics programs (Section 5 U.S.C. § 13122(e)(1)). Your response to OGE's Annual Ethics Program Questionnaire (the questionnaire) serves as your annual report.

OGE uses the data collected through the questionnaire in many ways, including sharing information about the entire executive branch ethics program with the public, Congress, and the ethics community. OGE also uses the information to carry out its oversight role, to gain knowledge about individual programs, as well as the overall ethics program, and to make informed decisions about resource allocations and priorities. OGE posts a summary of questionnaire responses and each agency's unedited responses on OGE's website. Therefore, please ensure your responses are suitable for publication.

OGE encourages each agency to use the annual exercise of completing the questionnaire as an opportunity to evaluate your ethics program.

**DUE DATE:** By regulation, the questionnaire is due to OGE by February 3, 2025. (5 C.F.R. § 2638.207(a)).

**PART 2. INSTRUCTIONS**

Your response to this questionnaire should reflect the 2024 calendar year (i.e., 1/1/2024 through 12/31/2024), except as specified. The answers provided should reflect the aggregate data for **your agency**. OGE will only accept **one submission per agency**.

Throughout the questionnaire you will be offered an opportunity to provide comments or explanations for your responses. Please use these comment sections to explain any discrepancies between levels of required activity and actual activity, and to explain significant changes from your 2022 report. To safeguard privacy, in your responses please avoid the use of Personally Identifiable Information (PII). After OGE has reviewed your questionnaire submission, you may be contacted for follow-up.

**PART 3. DEFINITIONS**

**Agency Head:** For purposes of this questionnaire, the term "agency head" means the head of an agency. In the case of a department, it means the Secretary of the department. In the case of a board or commission, it means the Chair of the board or commission.

**D.C Metro Area:** For purposes of this questionnaire, D.C. Metro Area means the District of Columbia, DC; Calvert County, MD; Charles County, MD; Prince George's County, MD; Arlington County, VA; Clarke County, VA; Culpeper County, VA; Fairfax County, VA; Fauquier County, VA; Loudoun County, VA; Prince William County, VA; Rappahannock County, VA; Spotsylvania County, VA; Stafford County, VA; Warren County, VA; Alexandria city, VA; Fairfax city, VA; Falls Church city, VA; Fredericksburg city, VA; Manassas city, VA; Manassas Park city, VA; Jefferson County, WV; and, Silver Spring-Frederick-Rockville, MD Metropolitan Division Frederick County, and Montgomery County.

**Agency Employees:** For purposes of this questionnaire, the term “agency employees” means any officer or employee of an agency, including a special Government employee. It includes officers but not enlisted members of the uniformed services.

**Special Government Employee (SGE):** For purposes of this questionnaire, the term “special Government employee” (SGE) means an officer or employee who is retained, designated, appointed, or employed, to perform temporary duties, either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days. The term “SGE” does not include enlisted members of the Armed Forces. It does, however, include these categories of officers or employees:

- Part-time United States commissioners;
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily.

**PART 4. PROGRAM RESOURCES AND ADMINISTRATION**

1. Agency: \_\_\_\_\_ **143**
2. Number of full-time agency employees as of December 31, 2024: \_\_\_\_\_ **3,855,963**
3. Information about the Designated Agency Ethics Official (DAEO):

a. Vacant (as of December 31, 2024)?	<input type="checkbox"/> Yes ( <i>skip to #4a</i> ) <b>3 (2%)</b> <input type="checkbox"/> No <b>140 (98%)</b>
b. Time in current DAEO position	<input type="checkbox"/> Less than 1 year <b>14 (10%)</b> <input type="checkbox"/> 1-4 years <b>69 (49%)</b> <input type="checkbox"/> 5-9 years <b>30 (21%)</b> <input type="checkbox"/> 10 or more years <b>27 (19%)</b>
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year <b>5 (3.5%)</b> <input type="checkbox"/> 1-4 years <b>42 (30%)</b> <input type="checkbox"/> 5-9 years <b>26 (18.5%)</b> <input type="checkbox"/> 10 or more years <b>67 (48%)</b>
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% <b>107 (76%)</b> <input type="checkbox"/> 26-50% <b>16 (11%)</b> <input type="checkbox"/> 51-75% <b>7 (5%)</b> <input type="checkbox"/> 76-100% <b>10 (7%)</b>
e. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <b>120 (86%)</b> <input type="checkbox"/> political appointee <b>20 (14%)</b>
f. Number of reporting levels between the DAEO and the agency head.	<input type="checkbox"/> 0 (the agency head is the DAEO) <b>4 (3%)</b> <input type="checkbox"/> 1 <b>103 (74%)</b> <input type="checkbox"/> 2 <b>29 (19%)</b> <input type="checkbox"/> 3 <b>4 (3%)</b> <input type="checkbox"/> 4 or more <b>0 (0%)</b>

4. Information about the Alternate Designated Agency Ethics Official (ADAEO):

a. Vacant (as of December 31, 2024)?	<input type="checkbox"/> Yes ( <i>skip to #5</i> ) <b>6 (4%)</b> <input type="checkbox"/> No <b>137 (96%)</b>
b. Time in current ADAEO position	<input type="checkbox"/> Less than 1 year <b>29 (21%)</b> <input type="checkbox"/> 1-4 years <b>58 (42%)</b> <input type="checkbox"/> 5-9 years <b>31 (23%)</b> <input type="checkbox"/> 10 or more years <b>19 (14%)</b>
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year <b>9 (6.5%)</b> <input type="checkbox"/> 1-4 years <b>35 (25.5%)</b> <input type="checkbox"/> 5-9 years <b>29 (21%)</b> <input type="checkbox"/> 10 or more years <b>64 (47%)</b>
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% <b>70 (51%)</b>

	<input type="checkbox"/> 26-50% <b>21 (15%)</b> <input type="checkbox"/> 51-75% <b>11 (8%)</b> <input type="checkbox"/> 76-100% <b>35 (26%)</b>
e. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <b>133 97%</b> <input type="checkbox"/> political appointee <b>4 (3%)</b>

5. Number of employees, including the DAEO and ADAEO, who performed ethics program duties in 2024 (e.g., financial disclosure, education and training, advice and counseling, and program administration).

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week	1-10 hours per week	11-20 hours per week	21-30 hours per week	31-40 hours per week	
	(up to .025 FTE*)	(up to .25 FTE*)	(up to .5 FTE*)	(up to .75 FTE*)	(up to 1 FTE*)	
a. D.C. Metro area	<b>840</b>	<b>772</b>	<b>242</b>	<b>125</b>	<b>661</b>	<b>2,640</b>
b. Outside the D.C. Metro area	<b>2,172</b>	<b>2,566</b>	<b>525</b>	<b>165</b>	<b>288</b>	<b>5,716</b>
<b>TOTAL</b>	<b>3,012</b>	<b>3,338</b>	<b>767</b>	<b>290</b>	<b>949</b>	<b>8,356</b>

\*FTE = Full Time Equivalent

*Example:* The table below provides an example of an agency with 13 employees who performed ethics program duties in 2024.

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week	1-10 hours per week	11-20 hours per week	21-30 hours per week	31-40 hours per week	
	(up to .025 FTE*)	(up to .25 FTE*)	(up to .5 FTE*)	(up to .75 FTE*)	(up to 1 FTE*)	
a. D.C. Metro area	<b>1</b>	<b>0</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>6</b>
b. Outside the D.C. Metro area	<b>1</b>	<b>3</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>7</b>
<b>TOTAL</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>2</b>	<b>1</b>	<b>13</b>

6. In what areas did contractors support the ethics program? Select all that apply.
- Not applicable (no contractors supported the ethics program) **86**
  - IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.) **49**  
Please describe the IT support (optional): [Table 1](#)
  - Administrative support (e.g., tracking filing or training requirements, sending reminders, data entry, etc.) **20**  
Please describe the administrative support (optional): [Table 2](#)
  - Substantive ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.) **8**  
Please describe the substantive support (optional): [Table 3](#)
  - Other (please describe) **1** [Table 4](#)
7. Did your agency **receive** ethics services or support from another federal agency or federal entity? Do not include contractors, OGE support, or OMB support of MAX.gov.
- Yes **31 (22%)**  
Please provide the name(s) of the federal agency or entity:  
Describe the services or support received: [Table 5](#)
  - No **112 (78%)**
8. Did your agency **provide** ethics program services or support for any board, commission, or agency that is independent of your agency?
- Yes **25 (17%)**  
Please provide the name(s) of the board, commission, or agency: [Table 6](#)  
Describe the services or support provided: [Table 6](#)
  - No **118 (83%)**
9. Does your agency's ethics program need additional resources? Check all that apply.
- No additional resources needed **90**
  - Human Capital **44**
  - Technology **36**
  - Other (specify) \_\_\_\_\_ **9** [Table 7](#)
10. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2024?
- Yes **106 (75%)**
  - No **35 (25%)**
  - Not applicable (specify why) \_\_\_\_\_ **2** [Table 8](#)

11. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) or any entity outside of your agency (e.g., GAO or private auditing firm) evaluate any aspect of the ethics program in 2024 (5 C.F.R. § 2638.104(c)(16))? **Exclude** program reviews conducted by OGE. Select all that apply.

- My agency (e.g., ethics office, Inspector General, General Counsel, etc.) conducted an evaluation **72**
- An entity outside of my agency, other than OGE, (e.g., GAO or a private auditing firm) conducted an evaluation (please describe \_\_\_\_\_) **17** [Table 9](#)
- No evaluation was conducted (*skip to #13*) **63**

12. What kind of changes resulted from the evaluation?

- Programmatic changes (please describe) \_\_\_\_\_ **51** [Table 10](#)
- Policy changes (please describe) \_\_\_\_\_ **27** [Table 11](#)
- No changes resulted (specify why not) \_\_\_\_\_ **12** [Table 12](#)
- Recommendations still being considered (please describe) \_\_\_\_ **3** [Table 13](#)
- Evaluation has not been completed \_\_\_\_\_ **2**
- Not applicable (specify why) \_\_\_\_\_ **1** [Table 14](#)

13. Of the following required written procedures, which did you have in place? Check all that apply:

- Financial disclosure program, including for the filing, review, and when applicable, public availability of public financial disclosure reports (5 C.F.R. § 2638.104(c)(8)(i)) **140**
- Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. § 2638.303) **137**
- Provision of initial ethics training (5 C.F.R. § 2638.304) **141**
- Issuance of ethics notice to new supervisors (5 C.F.R. § 2638.306) **135**
- None. Explain what steps you are taking to implement the required written procedures: \_\_\_\_\_ **0** [Table 15](#)

**ADDITIONAL COMMENTS FOR PART 4.** Please indicate the question number to which the comment corresponds. [Table 16](#)

**PART 5. EDUCATION AND TRAINING**

14. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. § 2638.303, provide the DAEO with the written confirmation required pursuant to 5 C.F.R. § 2638.310?
- Written confirmation not required because my agency has fewer than 1,000 employees **86**
  - Written confirmation not required because the DAEO’s office is responsible for issuing ethics notices to prospective employees **3**
  - All of the offices provided written confirmation to the DAEO **53 (98%)** (*skip to #16*)
  - Some of the offices provided written confirmation to the DAEO (explain why not all offices, then skip to #16) \_\_\_\_\_ **0 (0%)**  
[Table 17](#)
  - None of the offices provided written confirmation to the DAEO (explain why not all offices, then skip to #16) \_\_\_\_\_ **1 (2%)**  
[Table 18](#)
15. Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. § 2638.303?
- All of the written offers included the required information **76 (94%)**
  - Some of the written offers included the required information (please explain why not all offers) **5 (6%)** [Table 19](#)
  - None of the written offers included the required information (please explain why not all offers) **0 (0%)** [Table 20](#)
  - Not applicable because no offers of employment were made **7**
  - Not applicable for another reason (please explain) \_\_\_\_\_ **1** [Table 21](#)
16. Initial Ethics Briefing

a. How many agency leaders, as defined in 5 C.F.R. § 2638.305(a), were required to receive ethics briefings by December 31, 2024? <b>Exclude</b> SGEs that were expected to serve less than 60 days on a board, commission, or committee.	<b>58</b>
i. How many new agency leaders received their briefing within 15 days of their appointment?	<b>56 (97%)</b>
ii. How many new agency leaders received their briefing beyond the 15-day requirement?	<b>1 (2%)</b>
iii. How many new agency leaders have yet to receive their briefing as of today?	<b>1 (2%)</b>

If applicable, please explain why some of the leaders received their briefing beyond the 15-day requirement or have yet to receive their briefing: \_\_\_\_\_ [Table 22](#)

17. Initial Ethics Training

a. How many employees, as defined in 5 C.F.R. § 2638.304(a), were required to receive Initial Ethics Training (IET) by December 31, 2024 (5 C.F.R. § 2638.304)? <b>Exclude</b> SGEs that were expected to serve less than 60 days on a board, commission, or committee. (Note: Include employees who were not required to receive the interactive portion of the IET, as provided in 5 C.F.R. § 2638.304(a)(2).)	<b>408,988</b>
i. How many of those employees received IET within the 3-month requirement?	<b>387,033 (95%)</b>
ii. How many of those employees received IET beyond the 3-month requirement?	<b>11,076 (3%)</b>
iii. How many of those employees have not received IET as of today?	<b>10,879 (3%)</b>

If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET: \_\_\_\_\_ [Table 23](#)

*Example:* If an employee started at the agency on December 15, 2024, and the employee completed IET prior to the end of the calendar year, include the employee in your required and received numbers. If, on January 1, 2025, the employee has not completed IET, do not count that employee in your required numbers. Instead, include the employee in your 2025 questionnaire response to be filed in 2026.

18. Did the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required written confirmation to the DAEO, pursuant to 5 C.F.R. § 2638.310?

- Written confirmation not required because my agency has fewer than 1,000 employees **83**
- Written confirmation not required because all IET was provided by an office under the DAEO’s supervision **33**
- All of the offices provided the written confirmation to the DAEO **27 (100%)**
- Some of the offices provided the written confirmation to the DAEO (explain why not all offices) \_\_\_\_\_ **0 (0%)** [Table 24](#)
- None of the offices provided the written confirmation to the DAEO (explain why not all offices) \_\_\_\_\_ **0 (0%)** [Table 25](#)

19. Did the head of the agency complete either initial ethics training and/or annual ethics training in 2024?

- Yes **134 (95%)**
- No (specify why) \_\_\_\_\_ **7 (5%)** [Table 26](#)
- Not applicable (specify why) \_\_\_\_\_ **2** [Table 27](#)

20. Required Annual Ethics Training

Type of covered employees ( <b>Include SGE filers</b> )	# Required	# Received (of those required)
a. Executive Schedule Level I or Level II public filers (OGE Form 278e)	<b>56</b>	<b>56 (100%)</b>
b. All other public filers (OGE Form 278e)	<b>23,966</b>	<b>23,244 (98%)</b>
c. Confidential filers (OGE Form 450 and OGE-approved alternative confidential financial disclosure forms)	<b>369,329</b>	<b>361,609 (98%)</b>
d. Other employees required by 5 C.F.R. § 2638.307(a) (employees appointed by the President; employees of the Executive Office of the President; contracting officers; or, other employees designated by the head of the agency.)	<b>35,717</b>	<b>34,734 (97%)</b>
<b>TOTAL</b>	<b>429,068</b>	<b>419,643 (98%)</b>

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: \_\_\_\_\_ [Table 28](#)

21. Did your agency establish additional requirements for the agency's ethics education program, pursuant to 5 C.F.R. § 2638.309?:

- My agency established additional training requirements for employees performing ethics duties described in 5 C.F.R. §§ 2638.104-105 (ethics and human resources officials). Please describe: \_\_\_\_\_ **16** [Table 29](#)
- My agency established additional training requirements for other groups of employees, beyond those described in 5 C.F.R. §§ 2638.303-308 (notices to new employees and supervisors, initial ethics training, ethics briefings, annual ethics training). Please describe: \_\_\_\_\_ **47** [Table 30](#)
- My agency established additional training procedures (e.g., certification procedures). See 5 C.F.R. § 2638.309(c). Please describe: \_\_\_ **14** [Table 31](#)
- No, my agency did not establish additional training requirements \_\_\_ **81**

22. If your agency assessed risk to help inform the content, format, and/or timing of ethics education and communications, select all that apply (see [PA-19-05](#) for reference):

- Reviewed advice logs for common issues **84**
- Discussed upcoming work and agency priorities with senior staff **82**
- Talked to program managers about risks inherent in their work **75**
- Conducted surveys to identify common and emerging ethics risks **20**
- Talked to employees about the ethics concerns they encounter in the workplace **94**
- Other (please specify) \_\_\_\_\_ **16** [Table 32](#)
- My agency did not assess risk **24**

23. If your agency evaluated the effectiveness of your ethics education and/or communication, select all that apply (see [PA-19-05](#) for reference):

- Conducted self-assessments to ensure that required employees are receiving Training **91**
- Administered post-training evaluations to assess participants' perceptions of the training **40**
- Reviewed advice logs for increased activity after training presentations and Communications **60**
- Held discussions with agency leaders and employees to evaluate whether the training and communications they received supported them in managing ethics risks **67**
- Incorporated inclusivity principles in the development and delivery of ethics education **37**
- Ensured ethics education was accessible (508 compliant) to participants **61**
- Other (please describe) \_\_\_\_\_ **13**  
[Table 33](#)
- My agency did not evaluate the effectiveness of ethics education **25**

**ADDITIONAL COMMENTS FOR PART 5.** Please indicate the question number to which the comment corresponds. [Table 34](#)

**PART 6. ADVICE, COUNSELING, AND REMEDIES**

24. From the list below, select the three topics that your employees most frequently sought guidance on in 2024. Please rate them in order, so that the first topic is the topic on which employees sought guidance the most frequently.

Conflicting financial interests Most frequent topic: <b>16</b> agencies Second most frequent topic: <b>12</b> agencies Third most frequent topic: <b>7</b> agencies This topic was selected a total of <b>35</b> times
Gift acceptance Most frequent topic: <b>36</b> agencies Second most frequent topic: <b>22</b> agencies Third most frequent topic: <b>28</b> agencies This topic was selected a total of <b>86</b> times
Financial disclosure reporting Most frequent topic: <b>31</b> agencies Second most frequent topic: <b>32</b> agencies Third most frequent topic: <b>25</b> agencies This topic was selected a total of <b>88</b> times
Impartiality in performance of official duties Most frequent topic: <b>9</b> agencies Second most frequent topic: <b>11</b> agencies Third most frequent topic: <b>6</b> agencies This topic was selected a total of <b>26</b> times
Misuse of position, government resources, and information Most frequent topic: <b>0</b> agencies Second most frequent topic: <b>4</b> agencies Third most frequent topic: <b>12</b> agencies This topic was selected a total of <b>16</b> times
Outside employment/activities Most frequent topic: <b>37</b> agencies Second most frequent topic: <b>24</b> agencies Third most frequent topic: <b>27</b> agencies This topic was selected a total of <b>88</b> times
Post-employment restrictions Most frequent topic: <b>8</b> agencies Second most frequent topic: <b>21</b> agencies Third most frequent topic: <b>21</b> agencies This topic was selected a total of <b>50</b> times
Travel, subsistence, and related expenses from non-federal sources

<p>Most frequent topic: <b>5</b> agencies          Second most frequent topic: <b>16</b> agencies          Third most frequent topic: <b>14</b> agencies          This topic was selected a total of <b>35</b> times</p>
<p>Other (specify) _____ <a href="#">Table 35</a>          Most frequent topic: <b>1</b> agency          Second most frequent topic: <b>1</b> agency          Third most frequent topic: <b>3</b> agencies          This topic was selected a total of <b>5</b> times</p>

25. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2024 (see 5 C.F.R. § 2635.602(a)): **2,725**
26. Number of 18 U.S.C. § 208 waivers granted in 2024:

	Number Granted in 2024	Number Sent to OGE
a. 208(b)(1) waivers	<b>177</b>	<b>177</b>
b. 208(b)(3) waivers	<b>260</b>	<b>236</b>

If applicable, please explain discrepancies between the number of waivers granted and the number provided to OGE: \_\_\_\_\_ [Table 36](#)

27. Number of Legal Expense Fund documents filed in 2024 (see 5 C.F.R. § 2635.1007):

	Number Filed in 2024	Number Sent to OGE
a. Trust Document	<b>1</b>	<b>1</b>
b. Quarterly Reports	<b>4</b>	<b>4</b>
c. Termination Report	<b>1</b>	<b>0</b>

If applicable, please explain discrepancies between the number of documents filed and the number provided to OGE: \_\_\_\_\_ [Table 37](#)

**ADDITIONAL COMMENTS FOR PART 6.** indicate the question number to which the comment corresponds. [Table 38](#)

**PART 7. FINANCIAL DISCLOSURE PROGRAM MANAGEMENT AND ELECTRONIC FILING SYSTEMS**

28. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. § 2638.105(a)(1))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	<b>64 (58%)</b>	<b>40 (36%)</b>	<b>6 (5%)</b>	<b>0 (0%)</b>	<b>33</b>
b. Confidential Filers	<b>57 (49%)</b>	<b>49 (42%)</b>	<b>7 (6%)</b>	<b>3 (3%)</b>	<b>27</b>

If not applicable, specify why. \_\_\_\_\_ [Table 39](#)

If “never” or “in some cases,” please explain further: \_\_\_\_\_ [Table 40](#)

29. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. § 2638.105(a)(2))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	<b>64 (59%)</b>	<b>40 (37%)</b>	<b>4 (4%)</b>	<b>0 (0%)</b>	<b>35</b>

If not applicable, specify why. \_\_\_\_\_ [Table 41](#)

If “never” or “in some cases,” please explain further: \_\_\_\_\_ [Table 42](#)

30. Were all public and confidential financial reports, in calendar year 2024, filed using an electronic filing system?

- Yes, all reports were filed in an electronic filing system (*skip to #31*) **65**
- No **78**

31. Indicate which forms your agency uses. Check all that apply.

- 450 (pdf) **74**
- 450 (excel) **9**
- 278e (pdf) **18**

- 278e (excel) **6**
- 278-T (pdf) **15**
- 278-T (excel) **5**

32. Which electronic filing system(s) does your agency use?

- Integrity* ONLY (skip to Additional Comments for this Part) **63 (44%)**
- Integrity* **and** Other (specify) \_\_\_\_\_ **80 (56%)** [Table 43](#)

33. Indicate for which forms your agency uses the “Other” e-filing system. Check all that apply.

- Public Financial Disclosure (OGE Form 278e)  
Provide the name of the other system: \_\_\_\_\_ **16** [Table 44](#)
- Periodic Transactions (OGE Form 278-T)  
Provide the name of the other system: \_\_\_\_\_ **15** [Table 45](#)
- Confidential Financial Disclosure (OGE Form 450 or OGE-approved alternative form) Provide the name of the other system: \_\_\_\_\_ **82** [Table 46](#)

34. Indicate your agency’s FY 2024 actual costs for using the e-filing system. *Note:* Because OGE does not charge fees to use *Integrity*, there are no reportable costs associated with the use of *Integrity*.

	Public (do not include <i>Integrity</i> )	Confidential	Total
a. Amount paid to a non-federal vendor in FY 2024	<b>\$956,824</b> <input type="checkbox"/> Don't know/don't track <b>17</b>	<b>\$6,805,340</b> <input type="checkbox"/> Don't know/don't track <b>18</b>	<b>\$7,762,164</b>
b. Amount paid to a federal agency in FY 2024	<b>0</b> <input type="checkbox"/> Don't know/don't track <b>17</b>	<b>\$1,959,955</b> <input type="checkbox"/> Don't know/don't track <b>17</b>	<b>\$1,959,955</b>
c. Amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2024	<b>\$122,734</b> <input type="checkbox"/> Don't know/don't track <b>27</b>	<b>\$2,217,868</b> <input type="checkbox"/> Don't know/don't track <b>38</b>	<b>\$2,340,602</b>
Total FY 2024 actual costs	<b>\$1,079,558</b>	<b>\$10,983,163</b>	<b>\$12,062,721</b>

35. Indicate the number of filers who filed electronically in fiscal year 2024.

	Public ( <b>excluding</b> filers in <i>Integrity</i> )	Confidential
Number of financial disclosure filers, not reports, who filed electronically in FY 2024	<b>5,132</b>	<b>369,962</b>

**ADDITIONAL COMMENTS FOR PART 7.** Please indicate the question number to which the comment corresponds. [Table 47](#)

## PART 8. PUBLIC FINANCIAL DISCLOSURE

36. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2024, **excluding** SGEs, and the number of reports actually filed (i.e., received) by December 31, 2024.

OGE Form 278e Reports		PAS <sup>2</sup>	Non-Career SES <sup>3</sup>	Career SES <sup>3</sup>	Schedule C	Other <sup>4</sup>	TOTAL
a. New Entrant	Required		93	1,433	373	1,808	3,707
	Filed		91(98%)	1,423 (99%)	370 (99%)	1,775 (98%)	3,659
b. Annual	Required	659	815	9,389	1,464	10,081	22,408
	Filed	659 (100%)	815 (100%)	9,385 (99.9%)	1,458 (99.5%)	10,068 (99.8%)	22,385 (99.8%)
c. Termination	Required	87	166	1,067	311	1,258	2,889
	Filed	86 (99%)	166 (100%)	1,057 (99%)	300 (96%)	1,246 (99%)	2,855 (99%)
d. Combination <sup>1</sup>	Required	14	21	130	35	151	351
	Filed	14 (100%)	21 (100%)	128 (98%)	34 (97%)	148 (98%)	345 (99%)
Total	Required	760	1,095	12,018	2,183	13,298	29,354
	Filed	759 (99.8%)	1,093 (99.8%)	11,993 (99.7%)	2,162 (99%)	13,237 (99.5%)	29,244 (99.6%)

<sup>1</sup> Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

<sup>2</sup> Presidential appointees confirmed by the Senate.

<sup>3</sup> Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

<sup>4</sup> Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another category in the chart, etc.

*Example for new entrant and termination reports:* If an employee joined (or departed) the agency on December 15, 2024, and the employee filed a new entrant (or termination) report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, 2025, the employee has not filed a new entrant (or termination) report, do not count that report in your required numbers. Instead, include the report in your 2025 questionnaire response to be filed in 2026.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed: \_\_\_\_\_ [Table 48](#)

37. Report the number of public financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude** reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and section 4.02 of the Public Financial Disclosure Guide.

OGE Form 278e Reports		PAS <sup>2</sup>	Non-Career SES <sup>3</sup>	Career SES <sup>3</sup>	Schedule C	Other <sup>4</sup>	TOTAL
a. New Entrant	How many reports did your agency certify or close in 2024?		<b>95</b>	<b>1,366</b>	<b>429</b>	<b>1,921</b>	<b>3,811</b>
	Of those certified or closed in 2024, how many were initially reviewed within 60 days?		<b>83 (87%)</b>	<b>1,264 (92%)</b>	<b>390 (91%)</b>	<b>1,699 (88%)</b>	<b>3,436 (90%)</b>
	Of those certified or closed in 2024, how many were certified or closed within 60 days?		<b>68 (71%)</b>	<b>1,061 (78%)</b>	<b>303 (71%)</b>	<b>1,399 (73%)</b>	<b>2,831 (74%)</b>
b. Annual	How many reports did your agency certify or close in 2024?	<b>660</b>	<b>874</b>	<b>9,986</b>	<b>1,507</b>	<b>10,775</b>	<b>23,802</b>
	Of those certified or closed in 2024, how many were initially reviewed within 60 days?	<b>644 (97%)</b>	<b>815 (93%)</b>	<b>9,035 (90%)</b>	<b>1,403 (93%)</b>	<b>9,244 (86%)</b>	<b>21,141 (89%)</b>
	Of those certified or closed in 2024, how many were certified or closed within 60 days?	<b>548 (83%)</b>	<b>678 (78%)</b>	<b>7,063 (71%)</b>	<b>1,220 (81%)</b>	<b>7,166 (67%)</b>	<b>16,675 (70%)</b>
c. Termination	How many reports did your agency certify or close in 2024?	<b>71</b>	<b>203</b>	<b>1,035</b>	<b>277</b>	<b>1,262</b>	<b>2,848</b>

	Of those certified or closed in 2024, how many were initially reviewed within 60 days?	<b>69 (97%)</b>	<b>199 (98%)</b>	<b>982 (95%)</b>	<b>266 (96%)</b>	<b>1,196 (95%)</b>	<b>2,712 (95%)</b>
	Of those certified or closed in 2024, how many were certified or closed within 60 days?	<b>64 (90%)</b>	<b>187 (92%)</b>	<b>933 (90%)</b>	<b>249 (90%)</b>	<b>1,136 (90%)</b>	<b>2,569 (90%)</b>
d. Combination <sup>1</sup>	How many reports did your agency certify or close in 2024?	<b>15</b>	<b>23</b>	<b>133</b>	<b>35</b>	<b>144</b>	<b>350</b>
	Of those certified or closed in 2024, how many were initially reviewed within 60 days?	<b>13 (87%)</b>	<b>23 (100%)</b>	<b>128 (96%)</b>	<b>33 (94%)</b>	<b>135 (94%)</b>	<b>332 (95%)</b>
	Of those certified or closed in 2024, how many were certified or closed within 60 days?	<b>13 (87%)</b>	<b>20 (87%)</b>	<b>114 (86%)</b>	<b>32 (91%)</b>	<b>129 (90%)</b>	<b>308 (88%)</b>
TOTAL	How many reports did your agency certify or close in 2024?	<b>746</b>	<b>1,195</b>	<b>12,521</b>	<b>2,248</b>	<b>14,102</b>	<b>30,812</b>
	Of those certified or closed in 2024, how many were initially reviewed within 60 days?	<b>726 (97%)</b>	<b>1,120 (94%)</b>	<b>11,409 (91%)</b>	<b>2,092 (93%)</b>	<b>12,274 (87%)</b>	<b>27,621 (90%)</b>
	Of those certified or closed in 2024, how many were certified or closed within 60 days?	<b>625 (84%)</b>	<b>953 (80%)</b>	<b>9,781 (78%)</b>	<b>1,804 (80%)</b>	<b>9,830 (70%)</b>	<b>22,993 (75%)</b>

<sup>1</sup> Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

<sup>2</sup> Presidential appointees confirmed by the Senate.

<sup>3</sup> Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

<sup>4</sup> Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another section, etc.

If applicable, please explain why some reports were reviewed more than 60 days after submission: \_\_\_\_\_ [Table 49](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **67**
- remedial action was being taken **18**
- other (specify) \_\_\_\_\_ **22** [Table 50](#)

38. Number of periodic transaction reports filed, **excluding** those filed by SGEs: \_\_\_\_\_ **22,322**

*Note:* Count the total number of periodic transaction reports filed. *Example 1:* If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the space above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12”.

39. Extensions and late fees for new entrant, annual, termination, and combination public financial disclosure reports and periodic transaction reports, **excluding** those for reports filed by SGEs.

	Granted Filing Extension	Granted Waiver of Late Filing Fee	Paid Late Filing Fee
a. Number of OGE Form 278e Reports	<b>4,564</b>	<b>409</b>	<b>164</b>
b. Number of OGE Form 278-T Reports	<b>788</b>	<b>506</b>	<b>158</b>

40. Number of public financial disclosure filers reported in calendar year 2024 to the Attorney General for failure to file: \_\_\_\_\_ **4**

41. How many requests for public financial disclosure reports did you receive in 2024? Count each OGE Form 201 as one request, even if it contains a request for documents for multiple individuals. \_\_\_\_\_ **943**

42. How many documents requested under the Ethics in Government Act did you release in calendar year 2024? \_\_\_\_\_ **11,518**  Don't Know/Don't Track **0**

**ADDITIONAL COMMENTS FOR PART 8.** Please indicate the question number to which the comment corresponds. [Table 51](#)

**PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE**

43. Report the number of confidential financial disclosure reports required to be filed by December 31, 2024, **excluding** SGEs, and the number of reports actually filed by December 31, 2024.

	a. Required	b. Filed	
		OGE Form 450	<b>352,582</b>
		OGE-approved alternative form	<b>50,111</b>
<b>Total</b>	<b>404,698</b>		<b>402,693 (99.5%)</b>

*Note:* If a 450 filer leaves the filing position before the due date, the report is not required per 5 C.F.R. § 2634.903(a).

*Example for new entrant reports:* If an employee started at the agency on December 15, 2024, and filed a new entrant report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, 2025, the employee has not filed a new entrant report, do not count that report in your required numbers. Instead, include the report in your 2025 questionnaire response to be filed in 2026.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed: \_\_\_\_\_ [Table 52](#)

44. Report the number of confidential financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude** reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	How many reports did your agency certify or close in 2024?	Of those certified or closed in 2024, how many were initially reviewed within 60 days?	Of those certified or closed in 2024, how many were certified or closed within 60 days?
a. OGE Form 450 and OGE-approved alternative	<b>398,689</b>	<b>370,251 (93%)</b>	<b>355,963 (89%)</b>

If applicable, please explain why some reports were reviewed more than 60 days after submission: \_\_\_\_\_ [Table 53](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **57**
- remedial action was being taken **25**
- other (specify) \_\_\_\_\_ **27** [Table 54](#)

45. Number of OGE 450 or OGE-approved alternative forms granted filing extensions in 2024: \_\_\_\_\_ **7,909**

**ADDITIONAL COMMENTS PART 9.** Please indicate the question number to which the comment corresponds. [Table 55](#)

**PART 10. ENFORCEMENT OF STANDARDS OF CONDUCT AND CRIMINAL AND CIVIL STATUTES**

46. Number of disciplinary actions taken in 2024 based wholly or in part upon violations of the Standards of Conduct provisions (5 C.F.R. part 2635) or your agency’s supplemental Standards (if applicable). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents

a. Total number of disciplinary actions that met the above criteria	<b>921</b>
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Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

i. Subpart A (General Provisions)	<b>314</b>
ii. Subpart B (Gifts from Outside Sources)	<b>4</b>
iii. Subpart C (Gifts Between Employees)	<b>7</b>
iv. Subpart D (Conflicting Financial Interests)	<b>13</b>
v. Subpart E (Impartiality in Performing Official Duties)	<b>33</b>
vi. Subpart F (Seeking Other Employment)	<b>8</b>
vii. Subpart G (Misuse of Position)	<b>354</b>
viii. Subpart H (Outside Activities)	<b>56</b>
ix. Subpart J (Legal Expense Funds)	<b>0</b>
x. Agency’s supplemental Standards of Conduct	<b>147</b>

47. Number of disciplinary actions taken in 2024 based wholly or in part upon violations of the criminal conflict of interest statutes (18 U.S.C. §§ 203, 205, 208, and 209), failure to file or filing false public financial disclosures (5 U.S.C. § 13106 or 18 U.S.C. § 1001), civil matters involving outside earned income (5 U.S.C. § 13143), or outside activities (5 U.S.C. § 13144). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents

a. Disciplinary actions taken based on violation of ethics laws	<b>16</b>
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Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

i. 18 U.S.C. § 203 (Compensation in Matters Affecting the Government)	<b>0</b>
ii. 18 U.S.C. § 205 (Claims Against and Matters Affecting the Government)	<b>1</b>

iii. 18 U.S.C. § 208 (Acts Affecting a Personal Financial Interest)	<b>6</b>
iv. 18 U.S.C. § 209 (Supplementation of Salary)	<b>2</b>
v. 5 U.S.C. § 13106 or 18 U.S.C. § 1001 (Failure to File or Filing False Public Financial Disclosures)	<b>4</b>
vi. 5 U.S.C. § 13143 (Outside Earned Income)	<b>1</b>
vii. 5 U.S.C. § 13144 (Outside Activities)	<b>3</b>

48. Number of referrals made in 2024 to the Department of Justice (DOJ) of potential violations of the conflict-of-interest statutes (18 U.S.C. §§ 203, 205, 207, 208, 209), failure to file or filing false public financial disclosures (5 U.S.C. § 13106 or 18 U.S.C. § 1001), civil matters involving outside earned income (5 U.S.C. § 13143) or outside activities (5 U.S.C. § 13144)

a. Referrals to Department of Justice	<b>61</b>
---------------------------------------	-----------

Of the referrals to DOJ (line a.), please note the DOJ referral status

b. DOJ Referral Status	
i. How many of those referrals were accepted for prosecution?	<b>6</b>
ii. How many of those referrals were declined for prosecution?	<b>42</b>
iii. How many of those referrals were pending DOJ's decision as of December 31, 2024?	<b>13</b>

Of the referrals to DOJ (line a.), please note the agency disciplinary status

c. Agency Disciplinary Action Status	
i. Of the cases referred to DOJ, how many resulted in disciplinary or corrective action?	<b>11</b>
ii. Of the cases referred to DOJ, how many resulted in a determination not to take disciplinary or corrective action?	<b>7</b>
iii. Of the cases referred to DOJ, how many are pending a determination as to whether disciplinary or corrective action will be taken?	<b>23</b>

iv. Of the cases referred to DOJ, how many involved employees who left the agency before the agency determined whether or not to take disciplinary action?	<b>15</b>
v. Of the cases referred to DOJ, how many involved 18 U.S.C. § 207, such that there was no option for disciplinary action?	<b>5</b>

49. Did your agency notify OGE of all referral(s) and disposition(s) of the referral(s) via OGE Form 202 (as required by 5 C.F.R. § 2638.206(a))?

- Yes **21**
- No (specify why) \_\_\_\_\_ **0** [Table 56](#)
- Not applicable because no covered referrals were made to DOJ **122**

**ADDITIONAL COMMENTS FOR PART 10.** Please indicate the question number to which the comment corresponds. [Table 57](#)

**PART 11. ETHICS PLEDGE ASSESSMENT (Executive Order 13989 (“Ethics Pledge”))**

50. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service ((SES), Schedule C, etc.) appointed to or by your agency from January 1 through December 31, 2024?

- Yes **63**
- No (*skip to #52*) **80**

*Note:* For guidance on what constitutes a full-time non-career appointee for purposes of the Ethics Pledge, see LA-21-07.

51. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2024, and indicate the number who did and did not sign the Ethics Pledge.

Number of Full-Time Non-Career Appointees	Type of Full-Time Non-Career Appointees by Category					
	PAS	PA	Non-career SES	Schedule C	Other	Total
a. Appointed 01/01/2024 – 12/31/2024	<b>50</b>	<b>175</b>	<b>127</b>	<b>435</b>	<b>68</b>	<b>855</b>
i. Signed the Ethics Pledge in 2024	<b>47</b>	<b>173</b>	<b>95</b>	<b>353</b>	<b>48</b>	<b>716</b>
ii. Required to sign the Pledge in 2024 but signed in 2025	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>
iii. Required to sign the Pledge, but did not sign (please explain)	<b>0</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>5</b>
iv. Not required to sign the Pledge because occupied an exempt non-policymaking position (Schedule C or other comparable authority)	<b>1</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>7</b>

v. Not required to sign the Pledge because appointed without break in service after serving in another position for which the Ethics Pledge was already signed	<b>2</b>	<b>1</b>	<b>31</b>	<b>72</b>	<b>19</b>	<b>125</b>
vi. Not required to sign for another reason (please explain)	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

For each appointee identified in line iii, please explain why that appointee did not sign the Pledge. \_\_\_\_\_ [Table 58](#)

For each appointee identified in line vi, please explain why that appointee was not required to sign the Pledge. \_\_\_\_\_ [Table 59](#)

If applicable, please explain discrepancies between the number appointed and the number who signed or did not sign the Pledge: \_\_\_\_\_ [Table 60](#)

52. Registered Lobbyist/and or Registered under the Foreign Agents Registration Act

a. How many appointees were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment? For purposes of this question, please include individuals appointed between January 1 and December 31, 2024, and subject to the Ethics Pledge, as well as holdover appointees subject to the Pledge. \_\_\_\_\_ (if 0 skip to #53) **2**

b. How many of those appointees who were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment have an ethics agreement addressing their obligations under paragraph 3 of the Ethics Pledge? \_\_\_\_\_ **2**

c. For any of those appointees who do not have an ethics agreement, please provide their name and an explanation (e.g., Pledge paragraph 3 not reasonably expected to limit participation in any agency matters because appointee's duties sufficiently unrelated to prior lobbying activities). \_\_\_\_\_ **0** [Table 61](#)

53. Section 3 of Executive Order 13989 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted to appointees in your agency in 2024, the names of those individuals granted waivers in 2024, and which of the Pledge paragraphs were implicated.

	Number of Ethics Pledge Waivers Granted By Pledge Paragraph	Name(s) of Individual(s) Granted Ethics Pledge Waivers
<b>a. Paragraph 1</b>	<b>0</b>	
<b>b. Paragraph 2</b>	<b>2</b>	<b>Anna Gomez Patricia Lee</b>
<b>c. Paragraph 3</b>	<b>2</b>	<b>Renita Marcellin Ross Templeton</b>
<b>d. Paragraph 4</b>	<b>0</b>	
<b>e. Paragraph 5</b>	<b>0</b>	
<b>f. Paragraph 6</b>	<b>0</b>	
<b>g. Paragraph 7</b>	<b>0</b>	
<b>h. Paragraph 8</b>	<b>0</b>	
<b>i. Paragraph 9</b>	<b>0</b>	
<b>j. Other (please explain)</b>	<b>0</b>	

If other, please explain. \_\_\_\_\_ [Table 62](#)

54. Number of violations, if any, of Executive Order 13989 in 2024. \_\_\_\_ **0**

55. Number of enforcement actions, if any, taken in 2024 as a result of violations of the Executive Order 13989 (regardless of whether the violation itself took place in 2024 or earlier). \_\_\_\_ **0**

**ADDITIONAL COMMENTS FOR PART 11.** Please indicate the question number to which the comment corresponds. [Table 63](#)

**PART 12. SPECIAL GOVERNMENT EMPLOYEES (SGEs)**

56. How many special Government employees (SGEs) did your agency have, in total, during calendar year 2024? \_\_\_\_\_ **37,748** (if zero, skip to Additional Comments for this Part)
57. Initial Ethics Training

a. How many SGEs who were expected to serve for 60 days or less on a board, commission, or committee were required to receive Initial Ethics Training (IET) by December 31, 2024 (5 C.F.R. § 2638.304(b)(2))?	<b>29,306</b>
i. How many of those SGEs received IET before or at the beginning of the first meeting?	<b>29,186 (99.6%)</b>
ii. How many of those SGEs received IET after the first meeting?	<b>86 (0.3%)</b>
iii. How many of those SGEs have not received IET as of today?	<b>34 (0.1%)</b>

If applicable, please explain why some SGEs received IET after the first meeting or have yet to receive IET: \_\_\_\_\_ [Table 64](#)

58. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2024, and the number of reports actually filed by December 31, 2024.

	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
a. Advisory Committee Members (FACA)	<b>27,384</b>	<b>27,330 (99.8%)</b>	<b>13</b>	<b>13 (100%)</b>
b. Advisory Committee Members (non-FACA)	<b>487</b>	<b>476 (98%)</b>	<b>0</b>	<b>0</b>
c. Experts/Consultants	<b>784</b>	<b>762 (97%)</b>	<b>15</b>	<b>15 (100%)</b>
d. Board Members	<b>192</b>	<b>189 (98%)</b>	<b>12</b>	<b>12 (100%)</b>
e. Commissioners	<b>63</b>	<b>59 (94%)</b>	<b>9</b>	<b>9 (100%)</b>
f. Other	<b>1,895</b>	<b>1,895 (100%)</b>	<b>90</b>	<b>90 (100%)</b>
<b>TOTAL</b>	<b>30,805</b>	<b>30,711 (99.7%)</b>	<b>139</b>	<b>139 (100%)</b>

*Example for new entrant and termination reports:* If an employee joined (or departed) the agency on December 15, 2024, and filed a new entrant (or termination) report prior

to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant (or termination) report, do not count that report in your required numbers. Instead, include the report in your 2025 questionnaire response to be filed in 2026.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed: \_\_\_\_\_ [Table 65](#)

59. Note the number of SGE disclosure reports certified or otherwise closed by your agency during the calendar year. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605, section 4.02 of the Public Financial Disclosure Guide, and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	Confidential Reports	Public Reports
a. How many reports did your agency certify or close in 2024?	<b>29,738</b>	<b>154</b>
b. Of those certified or closed in 2024, how many were initially reviewed within 60 days?	<b>29,578 (99%)</b>	<b>141 186 (94%)</b>
c. Of those certified or closed in 2024, how many were certified or closed within 60 days?	<b>29,336 (99%)</b>	<b>127 166 (84%)</b>

If applicable, please explain why some reports were reviewed more than 60 days after submission: \_\_\_\_\_ [Table 66](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **18**
- remedial action was being taken **4**
- other (specify) \_\_\_\_\_ **12** [Table 67](#)

60. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. § 2634.904(b): \_\_\_\_\_ **7,564**

61. Extensions and late filing fees for SGE financial disclosure reports:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
a. Number of OGE Form 278e Reports	<b>46</b>	<b>3</b>	<b>0</b>
b. Number of OGE Form 450 or OGE-Approved Alternative Forms	<b>182</b>		

**ADDITIONAL COMMENTS FOR PART 12.** Please indicate the question number to which the comment corresponds. [Table 68](#)

## APPENDIX

### PART 4. PROGRAM RESOURCES AND ADMINISTRATION

**Table 1: Q.6 In what areas did contractors support the ethics program? Select all that apply.**

FDOnline (Intelliworx) provided administrative support.
A contractor employee converted the annual ethics training Powerpoint slides to the format required for our Learning Management System and added closed captioning to create the online interactive annual ethics training.
Only National Guard Bureau and US Army Intelligence and Security Command report using contractors for administrative support. These contractors monitor the organization's ethics inbox, track incoming requests for ethics support, and track filing and training requirements.
Assisted with the tracking of filers and data entry.
Assign OGE Form 450 reports to reviewers.
Contractors provide legal administrative support with TEAMS Ethics Training and assigning actions to attorneys for review and filing at some NASA centers.
Contractor assists with financial disclosure tracking and other administrative tasks.
Standard form emails
FDOnline (Intelliworx) provided administrative support.
A contractor employee converted the annual ethics training Powerpoint slides to the format required for our Learning Management System and added closed captioning to create the online interactive annual ethics training.
The Department of Commerce's Ethics Law and Program Office utilized contractor support for ethics training tracking, internal filer tracking, data entry, and customer support.
Only National Guard Bureau and US Army Intelligence and Security Command report using contractors for administrative support. These contractors monitor the organization's ethics inbox, track incoming requests for ethics support, and track filing and training requirements.
Assisted with the tracking of filers and data entry.
Assign OGE Form 450 reports to reviewers.
Contractors provide legal administrative support with TEAMS Ethics Training and assigning actions to attorneys for review and filing at some NASA centers.
Contractor assists with financial disclosure tracking and other administrative tasks.
Standard form emails
Administrative support (e.g., tracking filing, tracking training requirements, sending reminders, data entry, etc.)
Assisted with the tracking of filers and data entry.
Administrative support (e.g., tracking filing, tracking training requirements, sending reminders, data entry, etc.)

**Table 2: Q.6 In what areas did contractors support the ethics program? Select all that apply.**

FDOnline - electronic filing system (450s and 278s)
USARMY Financial disclosure Management System OGE INTEGRITY electronic filing System
FDOnline (Intelliworx) provided IT support.
The Commission uses contractor services from Intelliworx and their platform, FDOnline, for our 278 and 450 filers.
The Bureau requires its confidential financial disclosure (OGE Form 450) filers to submit their reports via FDOnline, which is an online filing system. Outside contractors created and continue to support this electronic filing system for several executive branch agencies, including the Bureau. The Bureau also uses an electronic system for reviewing all external speaking requests for Bureau employees. One of the purposes of this system is to identify and address any potential ethics issues (e.g., covered relationships, gifts, travel reimbursements). This system is supported by contractors.
DCAA uses Integrity administered by Office of Government Ethics and Financial Disclosure Management System administered by the U.S. Army. DCAA does not administer these IT programs or IT contractor support, but benefits from the IT products and Help Desk services.
DLA uses the Financial Management Disclosure System (FDM) run by the Army. We use contractor that support this system within their help desk. Additionally, DLA uses the Learning Management System (LMS) to provide and track training. This system is maintained by contract support.
A contractor employee filmed the Ethics Counselor's annual ethics training video.
The Army uses contractors to support the operation of its Financial Disclosure Management System for OGE submission by Army filers.
Assisted with creation and maintenance of database tools.
Development of case management system, employee resources website and interactive training modules.
FDOnline & Integrity
FDOnline e-filing system
Treasury contractors assisted in developing 450 module in HR Connect (human resources IT platform).
In 2024, we used IT contractor support for several electronic platforms that we use. For example, we had to work with the developer to make coding changes to the e-450 platform to accommodate OGE's updates to the OGE 450 form. We also continued to improve our ethics dashboard that ethics officials use to track the status of their employees' confidential financial disclosures and completion of initial and annual ethics training. We also used IT contractor support to develop ethics training modules and to implement an in-house application for electronic filing of ethics travel requests and approvals.
Assisting with ensuring that the FDOnline program was compatible with our systems
We receive support IT support for FDOnline and Ethics database.

creating and updating the platform the 450 filers use. They also created a platform for the Outside Activity approval process.
The FTC uses FDonline to file and review most confidential financial disclosure (OGE Form 450) reports.
Enhanced electronic OGE Form 450 (eForm 450) application and provided operational and maintenance support of the application.
FDonline
Online Confidential Financial Disclosure filing system.
Contractors support the Ethics Program Tracking System (EPTS) which is an electronic filing system, and electronic forms for NASA, including NASA's electronic platform for reviewing outside activity requests.
OGE Form 450 e-filing system
The NSF IT office is staffed by a mix of FTEs and contractors. Two IT contractors provide eFile support when necessary. An additional contractor assists with computer-based ethics training modules.
NSA uses contractor support for the ethics program financial disclosure filing system.
Ethics Gateway filing system vendor provided application development, quarterly updates/maintenance and ongoing application support.
Support for the e-filing system (Integrity) involves developing and deploying changes to the system, as well as providing Help Desk support.
OGC Ethics Website/Databases
Maintaining a SharePoint system to track staff requests to participate in outside events and management of ethics records for employees.
FDonline
OGE-450 filing system, ethics inquiry tracking system
FD Online software solution. Minimal questions to customer service
In concert with agency ethics officials and the agency's Office of the Chief Information Officer, contractors supported our development and refinement of an enterprise level electronic search tool. The tool enables ethics officials and employees to screen agency databases for potential employee financial and relational conflicts of interest involving the agency's international trade investigations.
N/A
IT support for website, filing and reporting systems
FDonline (Intelliworx) provided IT support.
A contractor employee filmed the Ethics Counselor's annual ethics training video.
The Army uses contractors to support the operation of its Financial Disclosure Management System for OGE submission by Army filers.
Assisted with creation and maintenance of database tools.
FDonline e-filing system
Enhanced electronic OGE Form 450 (eForm 450) application and provided operational and maintenance support of the application.

Contractors support the Ethics Program Tracking System (EPTS) which is an electronic filing system, and electronic forms for NASA, including NASA's electronic platform for reviewing outside activity requests.
The NSF IT office is staffed by a mix of FTEs and contractors. Two IT contractors provide eFile support when necessary. An additional contractor assists with computer-based ethics training modules.
OGC Ethics Website/Databases
Assisted with creation and maintenance of database tools.

**Table 3: Q.6 In what areas did contractors support the ethics program? Select all that apply.**

Assisted with the administration of training and initial review of financial disclosures.
Assisted with the administration of training and initial review of financial disclosures.
Substantive ethics support (e.g., on occasion, provided initial ethics training to new employees).
Assisted with the administration of training and initial review of financial disclosures.
The Federal Maritime Commission is using online interactive ethics training program for initial and certain annual ethics training.
In 2024, OGC attorney contractors supported the ethics program in a variety of ways. This included reviewing and drafting opinions on speaking engagements, and sharing with OGC ethics attorneys for final approval.
retained outside legal counsel to advise DAEO on ethics law
Substantive ethics support (e.g., on occasion, provided initial ethics training to new employees).

**Table 4: Q.6 In what areas did contractors support the ethics program? Select all that apply.**

DOI uses contractors to support the printing of certain ethics resource materials and to complete 508 compliance review of certain ethics materials.
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**Table 5: Q.7 Did your agency receive ethics services or support from another federal agency or federal entity? Do not include contractors, OGE support, or OMB support of MAX.gov.**

USDA provided access to their annual ethics training module
450 Electronic filing system
The ASBCA's GS employees are hired via the Army's civilian personnel system. The Army provides prospective GS employees with required ethics notices.
Support was received in the form of providing training and initial review of financial disclosures
On an as needed basis, DOI OIG provided consultative and direct employee ethics advice support.
Provides employment notices to new employees, including supervisors, and ethics training for political appointees.

Discussion of ethics questions related to support for non-Federal entities.
1. SOCO provided Department-wide guidance at monthly coordination meetings for DoD ethics practitioners, and we consulted with SOCO several times during the year on difficult or novel ethics questions. 2. Army is the executive agent for DoD use of the Financial Disclosure Management System, and the Army OGC provided user support to us throughout the year.
Advisory support
Log-in services to the Financial Disclosure Management System vial <a href="http://login.gov">login.gov</a> .
Hatch Act training and Whistleblower Protection Act training.
1. Provides FDM electronic filing system for Confidential Financial Disclosure reporting. 2. Provides DoD-wide ethics guidance and policies through DoD supplemental regulations at 5 C.F.R. Part 3601, the "Joint Ethics Regulation" (DoD Directive 5500. 7), legal advisories, and regular coordinating group meetings of Department ethics officials.
Financial Disclosure Management (FDM) system.
OSC/HAU: advice, guidance, and training on Hatch Act application and referral ODNI: guidance on 50 3073a such as FBI contractors' briefings and waivers (with NSA) USSS: collaboration on endorsement and fundraising issues w/FBI and USSS employee event
Use of Financial Disclosure Management System (FDM)
VA combined efforts with these agencies to create an ethics training video.
The Farm Credit System Insurance Corporation (FCSIC) is a very small federal corporation that shares many services with the FCA. As one of those shared services, the FCA Designated Agency Ethics Official (DAEO), with her team, provides ethics program management and services to FCSIC, including advice and counseling to FCSIC employees.
NARA uses a USG shared services provider (through an IAA) for certain Human Capital services. For example, the provider prepares and sends offer letters and includes ethics information in those letters.
Special Hatch Act presentation for Annual Ethics training.
Archive access to FDM, NCUA's prior OGE Form 450 e-filing system, for purposes of managing previously filed reports
Ethics policy, post-government employment issues and public financial disclosure reporting support
Provides ethics notices in offer letters to new hires
Ethics consultations
Office of Administration (OA): provided platform for virtual ethics training (initial and annual) and provided ethics guidance to DAEO OSC: provided Hatch Act training OGE: provided ethics guidance to OSTP DAEO OMB: provided ethics guidance to OSTP DAEO
The USDA DAEO provided live annual ethics training.
Ethics Compliance Tracking System
White House Counsel's Office provided routine ethics guidance, and assisted with providing initial ethics training.
The White House Counsel's Office provides support and partnership on new employee initial ethics trainings and annual ethics trainings. White House Counsel's Office also

provides support and partnership in developing ethics materials and responding to 201 requests.
(1) We worked with the Army to continue using the Financial Disclosure Management system (FDM) for our confidential financial disclosure report filers. (2) DoDEA provided us a detailee to assist us with our ethics program. The ethics detailee reviewed and certified financial disclosure reports, provided ethics advice to employees, etc.
We use their FDM system and they provide help desk support if needed. They don't provide any additional services related to the review of reports.
HUD's Ethics and Appeals Division (EAD) administers USICH's ethics program. EAD provides program administration, including preparing and submitting the annual Questionnaire and responding to program reviews. EAD also drafts the policies and notices used to satisfy 5 C.F.R. § 2638.303 for the USICH DAEO approval. EAD reviews, certifies, and maintains the financial disclosure reports of USICH employees and provides ethics advice to USICH staff. EAD also provides both initial and annual ethics training to USICH employees.

**Table 6: Q.8 Did your agency provide ethics program services or support for any board, commission, or agency that is independent of your agency?**

USADF Board of Directors received Ethics Training in December 2024.	Ethics Training was provided.
Southwest Border Regional Commission	Review and certify SF-278 of the Federal Co-Chair.
Federal Financial Institutions Examination Council (FFIEC) €“ Appraisal Subcommittee	The Bureau's Director serves on the FFIEC. This year the Appraisal Subcommittee of the FFIEC was developing and revising its Standards of Conduct and Ethics for Persons Affiliated with the Appraisal Foundation. The Bureau's ADAEO reviewed several drafts, identified additional ethics concerns, and provided draft language for FFIEC's consideration.
Defense Technical Information Center (DTIC) and Defense Standardization Program Office	DLA provides advice, training, and financial disclosure reviews and certifications.
Gulf Coast Ecosystem Restoration Council	The Department of Commerce's Ethics Law and Program Office provided financial disclosure filing services, training, and ethics advisory services.
1-Defense Health Agency, 2-Joint Personnel Recovery Agency, 3-DoD Joint Strike Fighter Program (program run by Dept of the Navy), Dept of the Army and Dept of the Navy personnel assigned to one Air Force base	1-Defense Health Agency ethics advice provided to Medical Group commanders with G-Series orders on installations of major command. 2-Joint Personnel Recovery Agency ethics reviews 3-DoD Joint Strike Fighter Program (program run by Dept of the Navy), Dept of the Army and Dept of the Navy personnel assigned to one Air Force base €“ all ethics matters

	including financial disclosure and post-government employment advice.
The Army's Financial Disclosure Management System is used on a reimbursable basis by the DoD and subordinate organizations, the Office of Government Ethics, Department Veterans Affairs, the Peace Corps, Department of Homeland Security, Department of State, the Armed Forces Retirement Home, and the Office of Personnel Management.	The FDM system is the Office of Government Ethics (OGE) approved on-line filing system and database used for each and every DoD OGE 450 filed by all DoD regular employees and service members, and the filing employees of several civilian departments and agencies listed above, to comply with the Ethics in Government Act and implementing regulations governing filing, review, and compliance reporting for OGE 450 Confidential Financial Disclosure reports and annual ethics training. In addition to providing the basic filing system, the FDM system provides users assistance with when users encounter log-in and other issues that impact the filing and review of OGE 450s. The system also provides a function that allows agencies to track annual ethics training.
Peace Corps	Provided a detailee to assist with an ethics program review.
National Assessment Governing Board (NAGB) and National Council on Disabilities (NCD)	Advice, counseling, ethics training and financial disclosure review and certifications.
United States Intercontinental Council on Homelessness	HUD's agency ethics officials administer all portions of an ethics program for USICH. EAD provides program administration, including preparing and submitting the annual Questionnaire and responding to program reviews. EAD also drafts the policies and notices used to satisfy 5 C.F.R. § 2638.303 for the USICH DAEO approval. EAD reviews, certifies, and maintains the financial disclosure reports of USICH employees and provides ethics advice to USICH staff. EAD also provides both initial and annual ethics training to USICH employees.
The Upper Colorado River Commission (UCRC), an interstate water administrative agency established by action of five state legislatures and Congress, and the Council of Inspectors General on Integrity and Efficiency (CIGIE).	The Departmental Ethics Office (DEO) provided full ethics services to the Chair of the UCRC, who was appointed by the President as a special Government employee, and ethics officials in the DOI Office of Inspector General provided as needed ethics advice and support services to CIGIE.
Farm Credit System Insurance Corp. (FCSIC)	FCSIC is a very small federal corporation that shares many services with the Farm Credit Administration (FCA). As one of those shared services, the FCA

	Designated Agency Ethics Official (DAEO), with her team, provides ethics program management and services to FCSIC, including advice and counseling to FCSIC employees.
International Boundary Commission	Reviewing, certifying financial disclosure reports, training.
National Space Council Users' Advisory Group (UAG) for the White House Office.	Provide the UAG FACA Committee with financial disclosure review, ethics advice and training, and ethics related administrative support.
Public Interest Declassification Board	Our ethics officials provide ethics support to the Public Interest Declassification Board, an independent board. The Information Security Oversight Office, which is part of NARA, serves as the Executive Secretariat for the PIDB and it can call on other NARA offices for support. NARA is authorized to expend its appropriations on PIDB activities, as PIDB does not receive any appropriations directly.
DoD Standards of Conduct Office	Data Call input and policy review
White House Counsel's Office and the Office of Administration	NSC consulted White House Counsel's Office and the Office of Administration as necessary on topics such as financial disclosure, outside engagements, new employee hires, gifts, and post-government employment advice.
Council of Economic Advisers	When they are between ethics officials OA provides ethics support.
OA	The DAEO was in frequent contact with OA about ethics matters, including the departure briefing process, the content, and the ethics guidance that were presented to OSTP staff.
National Space Council	Ethics training, advice and counseling for employees, review of financial disclosure filings, and review of requests for participation in outside events.
Social Security Advisory Board, Old-Age Survivors Insurance (OASI) Trust Fund, and the Disability Insurance Trust Fund	Ethics review of financial reports, Annual Ethics Training, ethics advice for conflicts of interest
Appalachian Regional Commission	The Appalachian Regional Commission's ethics officer assist the Southwest Border Regional Commission by providing an ethics training and answering questions regarding ethics procedures.
Secretary of Defense's USU Board of Regents	Legal and ethics support (financial disclosure, ethics training, ethics counseling)

International Broadcasting Advisory Board	Advice/counseling, conflicts review, training
Office of Pandemic Preparedness and Response Policy, Office of the Vice President, Office of the National Cyber Director, National Security Council, and Council of Economic Advisors	Ethics guidance, advice and counseling, training financial disclosure reporting and review public disclosure of financial disclosure reports

**Table 7: Q.9 Does your agency’s ethics program need additional resources? Check all that apply.**

We are continuing to explore whether an automated system for tracking ethics program activities and storing ethics program records would be beneficial.
Access to formal trainings beyond the military JAG schools. Additional funding for ethics officials to be able to travel, in order to provide, in person ethics training.
Budgetary
online training resources
Budget, tracking and training
ATF: Budgetary
Funds for new software (FDonline) and training, including to provide training to locations outside of Metro DC area.
With the presidential transition, EPA Ethics is working on nominee clearances and onboarding political appointees. At nearly the same time, we had to offboard 117 appointees from the previous administration, which involved ethics briefings, termination reports, negotiation notification forms, and counseling sessions. Simultaneous with providing new appointees with initial ethics training and reviewing their new entrant reports, we are also answering post-employment questions. All the while, we are still providing day-to-day ethics advice to career employees who are considering their own seeking, negotiating and post-employment obligations. To meet these growing demands while continuing to meet the existing ethics programmatic requirements, we need additional FTE and funding.
additional training materials

**Table 8: Q.10 Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2024?**

During the Director's new employee ethics briefing the OGE ethics team provided an overview of the agency's ethics program.
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**Table 9: Q.11 Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) or any entity outside of your agency (e.g., GAO or private auditing firm) evaluate any aspect of**

**the ethics program in 2024 (5 C.F.R. § 2638.104(c)(16))? Exclude program reviews conducted by OGE. Select all that apply.**

<p>During CY2024, the Department of Defense Office of Inspector General completed phase one of an Audit of Timeliness of Public Financial Disclosure Reports of Senior DoD Officials.</p>
<p>1. The DISA Ethics Program conducted an internal review of its existing procedures and evaluated programmatic strengths and weaknesses. 2. The DoD Office of the Inspector General (OIG) conducted an audit of financial disclosure reports filed by senior DoD officials, including DISA's public financial filers. The audit started in July 2023 and continued into early 2024.</p>
<p>On July 10, 2023, the DoD Office of the Inspector General announced an “Audit of DoD Senior Officials Public Financial Disclosures” (Project No. D2023-D000RG-0133.00). The primary purpose of this audit is to determine whether public financial disclosure reports of senior DoD officials were submitted and reviewed in a timely manner. The DoD OIG is also assessing whether DoD ethics officials took appropriate actions to identify and address potential conflicts of interest in public financial disclosure forms. The DoD Standards of Conduct Office (SOCO), military departments, and defense agencies that have Designated Agency Ethics Officials (DAEO) fall under the purview of this audit. DIA is a defense agency with a DAEO. Phase 1 of the audit was completed during 2024, but phase 2 is ongoing.</p>
<p>DoD Office of Inspector General conducted a review of DTRA's OGE 278 public financial disclosure reports.</p>
<p>USDA's ethics officials met with GAO in connection with their review of Executive Branch financial disclosure programs. The results of their review were issued in their report which can be found here: <a href="https://www.gao.gov/products/gao-25-107039">https://www.gao.gov/products/gao-25-107039</a></p>
<p>The DoD IG conducted an audit of the public financial disclosure programs of the Department of the Air and the other military services.</p>
<p>The Army continued its program of reviewing subordinate office ethics programs. Also, we began the process of working with the office of the Assistant Secretary of the Army (Financial Management and Comptroller) in their Risk Management and Internal Control (RMIC), Entity Level Control (ELC) review, which is continuing into 2025. This review is assessing several aspects of our ethics program with particular attention to financial disclosures.</p>
<p>The DoD IG conducted an audit of the OGE 278 program.</p>
<p>GAO is currently auditing FDA advisory committees related to conflicts of interest. HHS was included as one of four agencies whose financial disclosure programs were reviewed by GAO.</p>
<p>Internal Financial Controls Audit as mandated by DHS Financial Accountability Act using standards of review set by GAO Green Book and OMB Circular No. A-123. This review is conducted by an outside entity (KPMG). GAO evaluation of DHS Ethics support and application of PGE rules to CFIUS programs.</p>
<p>The Departmental Offices (DO) concluded an internal review process of all the bureau programs that were started in CY2023. As a part of the Mint’s annual internal controls audit, a private auditing firm evaluated certain aspects of the Mint’s ethics program.</p>
<p>The Office of Ethics continuously monitors and evaluates the Ethics Program during weekly team meeting as well as management meetings. Additionally, EXIM OIG conducted inquiries</p>

concerning Ethics policies and an Annual Financial Statement Audit done by KPMG includes review of the Annual Ethics Training Plan and results of previous year's OGE Annual Questionnaire.
Received Congressional Inquiry regarding one of our Commissioners
OIG, KPMG
Per GAO's notification request, the agency shared the post government ethics guidance the agency provides to its departing CFIUS staff.
As part of the Green Book audit, the Ethics Law Division provided information on initial ethics training and annual ethics training to an outside audit firm. In addition, the Office of the Inspector General audited the Ethics Law Division's Outside Activity program.
An external organization, Ethisphere, was selected to perform an independent assessment of TVA's Ethics & Compliance program and processes. The assessment benchmarked TVA's program against established best practices for mature ethics and compliance programs. TVA received Compliance Leader Verification certification.
DoD IG for 278 Program

**Table 10: Q.12 What kind of changes resulted from the evaluation?**

OGE's Program Review was published on July 26, 2023, and that resulted in 10 recommendations. CSB conducted its own evaluation of the agency's ethics program in response, and it has tightened up its procedures to ensure timely review of required ethics reports, enhanced ethics training, and improved policies and procedures. The CSB's Inspector General is continuing to monitor the agency's performance.
In 2024, CEQ implemented a new ethics portal and used it to manage annual confidential financial disclosure reports. Additionally, CEQ refined several of its SharePoint tools that track workflow and manage compliance.
The way in which we maintain outside employment records was addressed to make it easier to data mine. Specifically, files are now separated by month, year, approved, denied, and agency. We also took a look out our outside employment form and plan to make updates to it as well.
Training for current employees attending various leadership courses at DeCA HQ and Support Center was updated to ensure that topics and examples remained relevant and covered issues faced on a day-to-day basis by commissary store personnel. DeCA GC also modified the Leader Led Ethics Training conducted by the Agency Director for all senior staff. This training included procurement ethics.
Changes to Ethics Intake Portal. Developed and deployed new ethics training for GS-0511 Contract Auditors and certified for Continuing Professional Education credit.
1. In CY24, the DISA General Counsel established the Chief Ethics Officer as a discrete position within DISA's OGC to provide day-to-day oversight of the Ethics Program and manage the attorneys and staff supporting the Program. Additional resources (personnel) were dedicated to OGE Form 450 reviews and an after-action review was conducted to assess resource management for the 2025 filing season. Further programmatic changes are anticipated for

CY25. 2. The findings of the DoD IG audit were released in October 2024 and are being reviewed for programmatic improvements applicable to DISA.

We recognized that one of our weaknesses was the number of ethics counselors, so we are trying to train and appoint more ethics counselors, across all offices. We are also in the beginning stages of creating an AI tool which may reduce time spent on research and writing.

The following responses were provided by multiple installations. Programmatic changes: 1-One installation legal office implemented a Plan of Action and Milestones (POAM) to identify and manage all ethics deadlines based on the inspection of the ethics program by the Air Force Judge Advocate General's Office. This allowed it to better track all ethics requirements and ensure steps were accomplished prior to deadlines. That office also set up additional procedures with Civilian Personnel Office (CPO) and Newcomer Training Moderator to identify OGE 450 filers & new civilians, which was lacking in previous years. Another installation legal office revamped its initial ethics training program to make it interactive IAW 5 CFR 2638.304. That installation is no longer giving a live presentation to new employees. Instead, it created a new ethics training presentation in PowerPoint, with the necessary vignettes, and emailed it to the local CPO for dissemination and training tracking. They also provided training materials including the contact information for the legal office for questions. 2-One installation implemented the new training requirement for ethics officials that is set forth in the revised Joint Ethics Regulation (May 2024). Policy changes: 1-One installation in a major command underwent an inspection by the agency. A policy memo was updated to appropriately reflect requirement of a separate delegation for post-government employment advice. 2-One installation had a staff assistance visit from the Air Force Judge Advocate General's Office. A review of its ethics program led to minor policy changes and improvements for several programs. One example is that the installation received clarification and guidance regarding gifts to the agency and dealing with non-Federal entities. No changes: 1-Several installations in three major commands underwent inspections by the Air Force Judge Advocate General's Office, and their ethics programs were found to be compliant. No changes resulted. 2-The DoD IG was satisfied with the timeliness of the submission, review, and certification of the OGE Form 278s in the Department of the Air Force. Evaluation not complete: The DoD IG is continuing to work on the portion of their audit involving conflict of interest analysis of the 278s.

We developed a system of notification from the Army Civilian Human Resources Agency (CHRA) directly to Army OGC of all new entrant filers across the Army Enterprise. We now receive these new filer lists in a searchable and sortable excel worksheet every pay period. We then distribute to the appropriate DDAEOs who in turn, distribute to local installations' and organizations' ethics officials. We expect this to significantly improve our new entrant financial disclosure filer tracking.

The DAEO makes programmatic, and policy changes as needed during bi-weekly DAEO meetings. An example of programmatic changes includes strategic initiatives completed during 2024, such as: 1) creating new Ethics in Briefs (one-page handouts addressing ethics issues) 2) updating Ethics Info Memos (multiple-page handouts) and 3) creating an SOP providing procedures for Public Access to Financial Disclosure Reports.

Recommendations were implemented to improve procedures for notifications of new filers, financial disclosure reviews, and tracking ethics training. Interim DoD IG report on public financial disclosure reporting contained no findings. The final report is still pending.

Programs improved tracking of initial and annual ethics training and improved recordkeeping. Programs added additional SOPs and training materials. One program moved OGE Form 278e filers from a legacy filing system to Integrity. One program is considering how to increase staffing during annual financial disclosure review periods to address increased workloads during that period. Another is considering whether it would be possible to use AI to assist in giving ethics advice.

Programmatic -JMD/DEO: new tracking and approval system for gifts of travel expense reimbursement under 31 USC 1353 (E2 Solutions) enhanced IET notification and tracking methodology online annual ethics training launched for use Department-wide, continued modernization of ethics program CRM: more timely Form 278 review Policy-JMD/DEO: enhanced methodology for DAEO approval of ethics determinations enhanced DDAEO nomination, approval and redelegation tracking Presidential transition preparation and execution and in 2024 there was continued work on finalizing a new Department Ethics Order which was issued in January of 2025 BOP: updated Standards of Employee Conduct, donations policy, and outside travel policy EOUST: updated guidance for employees with a personal interest in bankruptcy cases updated ethics onboarding for Trustee candidates. Being considered- JMD/DEO: enhanced collection methodology of speaking engagement information, event attendance information, and WAG information is being considered and developed continued modernization of the ethics program enhanced onboarding of new political appointees including collaboration with other offices such as HR and OCIO for facilitating ethics briefings and tracking of IET and financial disclosure is being considered and developed. BOP: considering adding more ethics officials EOUST: updating personal and official speaking engagement guidance, updating ethics FAQs

As a result of the evaluations, the DEO updated the standard operating procedure (SOP) on offboarding certain employees and issued a new SOP governing onboarding of political appointees. The DEO also issued program advisories on procedures for approving and documenting public financial disclosure report extensions, on internal training progress reports, and initiating a standardized tracker for program compliance with regulatory requirements.

One of DOT's Operating Administrations (OAs) decided to move its 278 filers from FDOnline to Integrity. Additionally, some OAs hired new ethics officials.

At DO, the Program Manager's duties were re-adjusted in light of her pending retirement and the office was re-structured additionally, an SOP was implemented on documenting substantive ethics advice into the Ethics Database. OCC continued to improve consistency in the cautionary guidance provided to financial disclosure filers. The OIG implemented programmatic changes that had been recommended in 2023. TIGTA made policy changes to reflect revisions to Agency designations of positions as confidential filers. TTB improved its process in managing the intake and reviews of financial disclosures to facilitate closer attention to technical compliance.

Because the EPA ethics program is decentralized, the Ethics Office in the Office of General Counsel works continually to provide guidance and overall direction to the 100+ ethics officials. In 2024, we launched our improved electronic Ethics Travel Form, which is a workflow application process designed within EPA for travelers, travel preparers and ethics officials to use so that EPA Ethics can apply the correct statutory travel gift authority. We also continued to make improvements to our ethics dashboard that ethics officials use to track the metrics for their employees, such as their training and financial disclosure submission and completion rates. In addition, we unveiled our improved internal webpage that is used by EPA employees as a vital resource for finding ethics and Hatch Act-related information and resources.

Maintain periodic reviews with minor revisions to policy letters and SOPs. OIG ethics duties delegation memo revised. Proposed supplemental regulations restricting PAS employee bank holdings remain under discussion with OIG (non-concur).

Programmatic changes (please describe): In 2024, we provided 10-minute ethics briefings to staff offices as another way of keeping ethical obligations top of mind. At the request of the Agency Head, we briefed about an employee's duties to protect nonpublic information. Additionally, we provided a short briefing in person to the Denver office on conflicts of interest and the duty to act impartially while performing official duties. We also required non-commissioned examiners, who are not typically required to complete annual ethics training, to complete annual ethics training in 2024 to ensure that employees with oversight activities understand their ethical obligations. We also launched a cartoon video created jointly with the USDA and VA to highlight the ethical issues that arise when employees use social media. Policy changes (please describe): In 2024, we also reviewed the gift rules in the standards of conduct, the agency's supplemental ethics regulations, and FCA Board Policy Statement 81 (PS 81). PS 81 confirms the FCA's commitment to high ethical standards, but does not impose gift acceptance restrictions beyond those in the standards of conduct. We concluded that previous guidance prohibiting the acceptance of gifts of any dollar value from Farm Credit System (System) institutions was not supported by the rules, and that creating such a restriction would require OGE concurrence to a revision of the FCA's supplemental ethics regulations. We provided a 10-minute briefing to staff offices and issued an FCA Today news article to employees clarifying that we follow the standards of conduct rules regarding gifts from outside sources. We cautioned employees to consider whether the acceptance of the gift from a System institution under one of the exceptions in 5 C.F.R. § 2535.204 would cause a reasonable person with all of the relevant facts to question their, or the agency's, integrity. We advised that if an employee subjectively believes that their or the agency's integrity could be questioned, they should consider declining the otherwise permissible gift.

Programmatic changes (please describe): In 2024 we provided 10-minute briefings to staff offices as another way of keeping ethical obligations top of mind. We briefed about an employee's duties to protect nonpublic information. We also launched a cartoon video created jointly with the USDA and VA to highlight the ethical issues that arise when using social media. Policy changes (please describe): In 2024, we reviewed the gift rules in the standards of conduct and FCSIC's supplemental ethics regulations. We concluded that previous guidance prohibiting the acceptance of gifts of any dollar value from Farm Credit System (System) institutions was not supported by the rules. We provided a 10-minute

<p>briefing to staff offices and issued an FCA Today news article, which FCSIC employees also receive, to clarify that we follow the standards of conduct rules regarding gifts from outside sources. We cautioned employees to consider whether the acceptance of the gift from a System institution under one of the exceptions in 5 C.F.R. § 2535.204 would cause a reasonable person with all of the relevant facts to question their, or the FCSIC's, integrity. We advised that if an employee subjectively believes that their or FCSIC's integrity could be questioned, they should consider declining the otherwise permissible gift.</p>
<p>The FDIC's Office of Inspector General conducted an audit of conflicts of interest in acquisitions, which resulted in recommendations relating to additional ethics training on conflicts of interests for employees involved in acquisitions. The Ethics Unit is developing that training now and it will be implemented in 2025.</p>
<p>Formalized biweekly report from HR re: promotions. Improving process of notifying prospective employees of ethics responsibilities. Continue to focus on ensuring disclosure reports are certified within 60 days.</p>
<p>No formal recommendations were made by the FTC's Office of Inspector General after the conclusion of their evaluation. However, the FTC Ethics Office and the agency's Travel Office continue to collaborate to improve the non-federal source travel reimbursement process.</p>
<p>In response to OGE's inspection, IAF amended its written procedures to include the 60-day certification requirement.</p>
<p>New DAEO and ADAEO have been assigned. Discussions ongoing about how to improve communication between relevant departments.</p>
<p>Formal and extensive program procedures document created and provided to staff WAG attendance request form and approval/denial templates created.</p>
<p>NASA's ethics practice continually evaluates NASA's ethics program through proactive feedback (e.g., monthly virtual meetings, other communications, and client feedback). In 2024, after action regarding 278 reviews revealed staffing shortages and process issues related to features with the agency's automated tracking system both are being addressed. A programmatic improvement in 2024 was to provide voluntary live agency-wide Hatch Act training, and to expand the use of live agency-wide annual ethics training.</p>
<p>The ethics office reviewed several aspects of the ethics program, including the OGE 450 filing system, our outside activity approval process, initial ethics training, and communications about ethics rules with prospective employees. As a result, we have developed internally an OGE 450 electronic filing system, updated the outside activity form, revised our initial ethics training, and updated tentative offer letters to include ethics questions.</p>
<p>OGE Inspection recommended more robust follow up on financial disclosures and faster review and certification updates to the annual ethics trainings and general timeliness updates.</p>
<p>Updated internal ethics guidance handouts and intranet site for employees. Also enhanced coordination with Human Resources to streamline scheduling of new employees training.</p>
<p>The Agency's ethics program was evaluated internally to identify opportunities to increase efficiency in delivering ethics advice and support to the NLRB's employees. As a result, the Ethics Office streamlined existing processes for delivering written guidance and is reviewing existing policies and procedures for other potential improvements.</p>

As part of the prior year's internal evaluation, the agency hired an Assistant GC for Ethics early in 2024. The Assistant GC for Ethics evaluated the program and implemented updates to the financial disclosure program, guidance templates, and training materials.
Updated procedure for initial ethics training to include human resources officer in the information loop and to automatically submit certification of completion of initial ethics training to ethics official, HR, and administrative support personnel who tracks agency training.
Continuous improvement. In 2024 that included increasing resources to the ethics team, enhancements to the Ethics Portal and special training for several offices with particular needs.
As a new Office, OPR regularly evaluated its ethics program in the course of creating and refining its ethics policies and procedures.
Migration of all public filers to Integrity in 2024 and transition to FDM for all confidential filers in 2025.
My agency: Updated some ethics guidance and created new Standard Operating Procedures (SOPs), and provided additional ethics resources to staff. OSTP DAEO and OSTP leadership made updates and changes to the external events request review procedure including the level of legal team involvement and the ethics review required. Updated the annual ethics training, and the initial ethics training, made minor revisions to the ethics best practices and guidance for discussion with onboarding staff members during their first week at OSTP as part of the OSTP OGC's legal team meet & greet meeting. Entity outside of my agency: GAO has not closed out the request and any pending determinations are being handled by GAO.
Process changes to outside activity reviews.
OGC provided Hatch Act training to the workforce prior to the 2024 presidential election. OGC engaged employees in ethics guidance prior to their separation from the government.
Continue to work with HRD to ensure timely notification of personnel changes to ensure that confidential new entrant 450 filers file reports within 30 days of entering covered position.
There were some small updates to our annual ethics training.
Updated several ethics procedures, designated additional positions for confidential financial disclosure filing
As the GC/DAEO, I self-evaluate our ethics program on a monthly basis and make changes to either our internal policies or training slides based on issues of importance that come up that may be relevant to the SSS. For example, the initial ethics training slides are continuously revised and improved. One area that was revised and added to dealt with use of government resources and time.
Publication of yearly Ethics & Compliance report, established procedure to review documents post-ethics investigation to detect potential retaliation and continuing to automate ethics functions for conflict of interest disclosures.
USAID procured FDonline for OGE-450s and delegated certain functions to ethics officials and consolidated ethics program support requirements (e.g., HR).
There were 5 OGE recommendations. RECOMMENDATION: Ensure public financial disclosure reports exceeding the six-year retention period are destroyed as required by 5 C.F.R. § 2634.603(g)(1). RECOMMENDATION: Establish written procedures for issuing notices to

<p>prospective employees. Ensure that these procedures include the DAEO’s review of these written procedures each year as required by 5 C.F.R. § 2638.303(c). RECOMMENDATION: Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f). RECOMMENDATION: Establish safeguards to ensure that all SGE Commission members file their confidential financial disclosure reports timely. RECOMMENDATION: Ensure that all SGE Commission members indicate their reporting status on the first page of the confidential report as “New Entrant” in accordance with 5 CFR § 2634.903(b).</p>
<p>The Postal Service's Ethics and Compliance team performs yearly self-assessments of the program and makes any necessary changes. In 2024, we drafted internal guidance memoranda on the Ethics in Government Act, 18 U.S.C. § 201-209 (criminal conflict of interest laws), Blind Trusts, the Anti-Nepotism statute, and misuse of government vehicles. These memoranda will provide guidance to team members and assist us in analyzing complex ethics issues.</p>
<p>The DAEO (and GC) evaluated the timely completion of online Annual Ethics Training for applicable Commission staff. To increase ethics training accountability, the DAEO determined that employees required to attend Annual Ethics Training must have completed their online training via USDA's AgLearn system no later than September 30 in any calendar year. Although this is well before the regulatory training completion deadline, the earlier date ties completion of the training to an employees annual performance rating, which prevents training stragglers from missing the year-end (Dec 31) regulatory training deadline and provides additional performance accountability in the fully remote environment.</p>
<p>Further refined written policies</p>

**Table 11: Q.12 What kind of changes resulted from the evaluation?**

<p>We will be using Department of the Army FDM system for 2025 Confidential Financial Disclosures. Other programmatic changes are being considered.</p>
<p>Policy changes recommended by OGE were implemented</p>
<p>Generally, the audit found that senior DoD officials submitted, and DoD ethics officials reviewed, public financial disclosure reports in a timely manner. ASBCA annual, termination, and new entrant reports were timely submitted and reviewed 100% of the time. ASBCA periodic transaction reports were timely submitted 95% of the time, and timely reviewed 100% of the time. During CY2024, the ASBCA updated its policy to not allow filers to include non-reportable transactions on periodic transaction reports. Non-reportable transactions will be removed by the filer or the Ethics Official (with filer notification).</p>
<p>OGE's Program Review was published on July 26, 2023, and that resulted in 10 recommendations. CSB conducted its own evaluation of the agency's ethics program in response, and it has tightened up its procedures to ensure timely review of required ethics reports, enhanced ethics training, and improved policies and procedures. The CSB's Inspector General is continuing to monitor the agency's performance.</p>
<p>Based on our review of Agency ethics policies, we began to update our program documents to ensure that they were current. Additionally, we incorporated new legal analyses from this year into more formal standard operating procedures for the Ethics team.</p>

<p>We created a new tracking system for assignment to 450 positions.</p>
<p>Based on the review of the ethics program, it was determined that the agency's written policy on the financial disclosure program needs to be updated to reflect changes to the program and OGE regulations.</p>
<p>To ensure OGE 278 Transaction Reports (278-T) are timely filed, DoD implemented a policy that OGE 278 filers will not submit an OGE 278-T report for mutual funds. The purpose of the policy is to prevent reports being filed late due to the delays caused by financial advisors failing to notify filers of the transaction within 30-45 days.</p>
<p>The following responses were provided by multiple installations. Programmatic changes: 1- One installation legal office implemented a Plan of Action and Milestones (POAM) to identify and manage all ethics deadlines based on the inspection of the ethics program by the Air Force Judge Advocate General's Office. This allowed it to better track all ethics requirements and ensure steps were accomplished prior to deadlines. That office also set up additional procedures with Civilian Personnel Office (CPO) and Newcomer Training Moderator to identify OGE 450 filers &amp; new civilians, which was lacking in previous years. Another installation legal office revamped its initial ethics training program to make it interactive IAW 5 CFR 2638.304. That installation is no longer giving a live presentation to new employees. Instead, it created a new ethics training presentation in PowerPoint, with the necessary vignettes, and emailed it to the local CPO for dissemination and training tracking. They also provided training materials including the contact information for the legal office for questions. 2-One installation implemented the new training requirement for ethics officials that is set forth in the revised Joint Ethics Regulation (May 2024). Policy changes: 1-One installation in a major command underwent an inspection by the agency. A policy memo was updated to appropriately reflect requirement of a separate delegation for post-government employment advice. 2-One installation had a staff assistance visit from the Air Force Judge Advocate General's Office. A review of its ethics program led to minor policy changes and improvements for several programs. One example is that the installation received clarification and guidance regarding gifts to the agency and dealing with non-Federal entities. No changes: 1-Several installations in three major commands underwent inspections by the Air Force Judge Advocate General's Office, and their ethics programs were found to be compliant. No changes resulted. 2-The DoD IG was satisfied with the timeliness of the submission, review, and certification of the OGE Form 278s in the Department of the Air Force. Evaluation not complete: The DoD IG is continuing to work on the portion of their audit involving conflict of interest analysis of the 278s.</p>
<p>The DAEO makes programmatic, and policy changes as needed during bi-weekly DAEO meetings. An example of programmatic changes includes strategic initiatives completed during 2024, such as: 1) creating new Ethics in Briefs (one-page handouts addressing ethics issues) 2) updating Ethics Info Memos (multiple-page handouts) and 3) creating an SOP providing procedures for Public Access to Financial Disclosure Reports.</p>
<p>Programs improved tracking of initial and annual ethics training and improved recordkeeping. Programs added additional SOPs and training materials. One program moved OGE Form 278e filers from a legacy filing system to Integrity. One program is considering how to increase staffing during annual financial disclosure review periods to address increased workloads</p>

during that period. Another is considering whether it would be possible to use AI to assist in giving ethics advice.

Programmatic -JMD/DEO: new tracking and approval system for gifts of travel expense reimbursement under 31 USC 1353 (E2 Solutions) enhanced IET notification and tracking methodology online annual ethics training launched for use Department-wide, continued modernization of ethics program CRM: more timely Form 278 review Policy-JMD/DEO: enhanced methodology for DAEO approval of ethics determinations enhanced DDAEO nomination, approval and redelegation tracking Presidential transition preparation and execution and in 2024 there was continued work on finalizing a new Department Ethics Order which was issued in January of 2025 BOP: updated Standards of Employee Conduct, donations policy, and outside travel policy EOUST: updated guidance for employees with a personal interest in bankruptcy cases updated ethics onboarding for Trustee candidates. Being considered- JMD/DEO: enhanced collection methodology of speaking engagement information, event attendance information, and WAG information is being considered and developed continued modernization of the ethics program enhanced onboarding of new political appointees including collaboration with other offices such as HR and OCIO for facilitating ethics briefings and tracking of IET and financial disclosure is being considered and developed. BOP: considering adding more ethics officials EOUST: updating personal and official speaking engagement guidance, updating ethics FAQs

As a result of the evaluations, the DEO updated the standard operating procedure (SOP) on offboarding certain employees and issued a new SOP governing onboarding of political appointees. The DEO also issued program advisories on procedures for approving and documenting public financial disclosure report extensions, on internal training progress reports, and initiating a standardized tracker for program compliance with regulatory requirements.

At DO, the Program Manager's duties were re-adjusted in light of her pending retirement and the office was re-structured additionally, an SOP was implemented on documenting substantive ethics advice into the Ethics Database. OCC continued to improve consistency in the cautionary guidance provided to financial disclosure filers. The OIG implemented programmatic changes that had been recommended in 2023. TIGTA made policy changes to reflect revisions to Agency designations of positions as confidential filers. TTB improved its process in managing the intake and reviews of financial disclosures to facilitate closer attention to technical compliance.

Because the EPA ethics program is decentralized, the Ethics Office in the Office of General Counsel works continually to provide guidance and overall direction to the 100+ ethics officials. In 2024, we launched our improved electronic Ethics Travel Form, which is a workflow application process designed within EPA for travelers, travel preparers and ethics officials to use so that EPA Ethics can apply the correct statutory travel gift authority. We also continued to make improvements to our ethics dashboard that ethics officials use to track the metrics for their employees, such as their training and financial disclosure submission and completion rates. In addition, we unveiled our improved internal webpage that is used by EPA employees as a vital resource for finding ethics and Hatch Act-related information and resources.

Maintain periodic reviews with minor revisions to policy letters and SOPs. OIG ethics duties delegation memo revised. Proposed supplemental regulations restricting PAS employee bank holdings remain under discussion with OIG (non-concur).

Programmatic changes (please describe): In 2024, we provided 10-minute ethics briefings to staff offices as another way of keeping ethical obligations top of mind. At the request of the Agency Head, we briefed about an employee's duties to protect nonpublic information. Additionally, we provided a short briefing in person to the Denver office on conflicts of interest and the duty to act impartially while performing official duties. We also required non-commissioned examiners, who are not typically required to complete annual ethics training, to complete annual ethics training in 2024 to ensure that employees with oversight activities understand their ethical obligations. We also launched a cartoon video created jointly with the USDA and VA to highlight the ethical issues that arise when employees use social media. Policy changes (please describe): In 2024, we also reviewed the gift rules in the standards of conduct, the agency's supplemental ethics regulations, and FCA Board Policy Statement 81 (PS 81). PS 81 confirms the FCA's commitment to high ethical standards, but does not impose gift acceptance restrictions beyond those in the standards of conduct. We concluded that previous guidance prohibiting the acceptance of gifts of any dollar value from Farm Credit System (System) institutions was not supported by the rules, and that creating such a restriction would require OGE concurrence to a revision of the FCA's supplemental ethics regulations. We provided a 10-minute briefing to staff offices and issued an FCA Today news article to employees clarifying that we follow the standards of conduct rules regarding gifts from outside sources. We cautioned employees to consider whether the acceptance of the gift from a System institution under one of the exceptions in 5 C.F.R. § 2535.204 would cause a reasonable person with all of the relevant facts to question their, or the agency's, integrity. We advised that if an employee subjectively believes that their or the agency's integrity could be questioned, they should consider declining the otherwise permissible gift.

Programmatic changes (please describe): In 2024 we provided 10-minute briefings to staff offices as another way of keeping ethical obligations top of mind. We briefed about an employee's duties to protect nonpublic information. We also launched a cartoon video created jointly with the USDA and VA to highlight the ethical issues that arise when using social media. Policy changes (please describe): In 2024, we reviewed the gift rules in the standards of conduct and FCSIC's supplemental ethics regulations. We concluded that previous guidance prohibiting the acceptance of gifts of any dollar value from Farm Credit System (System) institutions was not supported by the rules. We provided a 10-minute briefing to staff offices and issued an FCA Today news article, which FCSIC employees also receive, to clarify that we follow the standards of conduct rules regarding gifts from outside sources. We cautioned employees to consider whether the acceptance of the gift from a System institution under one of the exceptions in 5 C.F.R. § 2535.204 would cause a reasonable person with all of the relevant facts to question their, or the FCSIC's, integrity. We advised that if an employee subjectively believes that their or FCSIC's integrity could be questioned, they should consider declining the otherwise permissible gift.

Review of confidential filing positions resulted in several positions being added to or dropped from the list of filers.

We have upgraded our technology. We are in the process of updating our written ethics policies and training.
As a new Office, OPRP regularly evaluated its ethics program in the course of creating and refining its ethics policies and procedures.
My agency: Updated some ethics guidance and created new Standard Operating Procedures (SOPs), and provided additional ethics resources to staff. OSTP DAEO and OSTP leadership made updates and changes to the external events request review procedure including the level of legal team involvement and the ethics review required. Updated the annual ethics training, and the initial ethics training, made minor revisions to the ethics best practices and guidance for discussion with onboarding staff members during their first week at OSTP as part of the OSTP OGC's legal team meet & greet meeting. Entity outside of my agency: GAO has not closed out the request and any pending determinations are being handled by GAO.
There were some small updates to our annual ethics training.
Note, only half of the findings have been submitted. First evaluation resulted in management policy change in the handling of 278-T reviews to ensure they are reviewed within 60 days. This also ensures better use of the "end initial review" option in Integrity.
USAID procured FDonline for OGE-450s and delegated certain functions to ethics officials and consolidated ethics program support requirements (e.g., HR).
There were 5 OGE recommendations. RECOMMENDATION: Ensure public financial disclosure reports exceeding the six-year retention period are destroyed as required by 5 C.F.R. § 2634.603(g)(1). RECOMMENDATION: Establish written procedures for issuing notices to prospective employees. Ensure that these procedures include the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c). RECOMMENDATION: Establish written procedures for initial ethics training as required by 5 C.F.R. § 2638.304(f). RECOMMENDATION: Establish safeguards to ensure that all SGE Commission members file their confidential financial disclosure reports timely. RECOMMENDATION: Ensure that all SGE Commission members indicate their reporting status on the first page of the confidential report as "New Entrant" in accordance with 5 CFR § 2634.903(b).
General policy updates

**Table 12: Q.12 What kind of changes resulted from the evaluation?**

The ethics program was determined to meet the needs of the agency and employees, therefore, no change was required.
The GAO report noted that USDA has the largest number of ethics financial disclosure reports among large Federal agencies but because the GAO report focused on the content and format of the OGE-278e form itself, GAO did not make any recommendations for change to USDA's Ethics Program.
Internal audit resulted in no findings. GAO received the requested information to conduct their evaluation.
No recommendations-The evaluation was a routine audit of financial disclosure.

In 2024, the DAEO evaluated the agency ethics program for its preparedness for a Presidential transition. The evaluation was reported to the agency head. There was no change recommended.
The entity deferred to our on-going OGE program review as the designated oversight entity.
Our ethics program is for three individuals - all were in compliance with reporting and training procedures. The DAEO and ADAEO attended trainings during the year.
No policy changes resulted. However, in anticipation of new Board members and employees, we confirmed that the Board's new employee program clearly delineated ethics requirements.
ONDCP's ethics program was recently audited, and we implemented policy changes based on OGE's recommendations, making any further adjustments unnecessary
The review concluded that the ethics program was functioning smoothly.
No changes were made because the Agency met all Green Book audit requirements and the Office of the Inspector General proposed no changes/recommendations to the Ethics Law Division's Outside Activity Program.
The evaluation did not raise any new concerns.

**Table 13: Q.12 What kind of changes resulted from the evaluation?**

The DoD IG has not yet written the final report, although the audit has concluded. Based on initial collaboration with the IG, OAGC(E) now receives HR lists every two weeks from both the HR units that control OGE 278 and OGE 450 filers. The lists now also include additional information, such as salary, identifying agency code information, pay plan, supervisor the name of the previous agency if it was a DoD entity.
Better tracking of training completion.
There are some recommendations related to training given recent EOs that were anticipated but not enacted at the time.

**Table 14: Q.12 What kind of changes resulted from the evaluation?**

Additional resources were identified, and additional personnel were hired.
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**Table 15: Q.13 Of the following required written procedures, which did you have in place? Check all that apply:**

As a small agency of 22 federal employees, the ADAEO works directly with the Associate Director for Administration to ensure compliance with 5 CFR Part 2638. The ADAEO has reviewed and provided input on draft written offers of employment and has personally provided initial ethics training to new employees. The ADAEO has met with and assisted each employee required to file a financial disclosure report. The ADAEO regularly provided ethics advice to agency officials with respect to attending events, meetings, outreach, and interactions with outside groups and organizations.
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**Table 16: ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds.**

Q11: An agency review was conducted during an OGE Review.
We are looking at continuous process improvements.
PAS was inadvertently selected in the 2023 Questionnaire response, career should have been selected.
Q 12: Hired financial disclosure analyst and increased technology resources.
Question 5: The employees identified as working "less than 1 hour per week" are the attorneys and paralegals who support the financial disclosure program for a limited time during the filing season.
#13 as noted in #7, the Office of Administration, Executive Office of the President, provides employment notices to new employees, including supervisors, and ethics training for political appointees.
Question 2: The number of DIA employees listed in this report reflects the unclassified number of DIA employees worldwide.
DLA follows the procedures written within the Joint Ethics Regulation regarding the timely filing, review, and public availability of reports.
Question 9: As the sole Ethics Office within the U.S. Department of Agriculture (USDA), the USDA Office of Ethics has a total staff of only 21 employees servicing all of USDA's 100,000 employees. This means that, proportionally, USDA has only one Ethics Advisor servicing 5,000 USDA employees. The long-standing under-investment in USDA's Ethics Program was exacerbated in Congress' FY 2024 enacted budget. The FY 2024 budget imposed a 20% cut to the Office of Ethics' (OE) already small budget (OE's budget was \$5.556 million in FY 2023 and was cut to \$4.5 million for FY 2024). This 20% reduction in funding doesn't include the effects of separate 4% and 2% government-wide salary pay increases for Federal employees in CYs 2024 and 2025, The effect of the budget cut and salary pay increases means that USDA's Office of Ethics is currently under an effective budget cut of 26%. Moreover, for the FY'25 budget, although the full year budget is not yet known, the Congressional markups which were released during the summer of 2024 portend serious concerns for the continued sustainability of USDA's centralized Ethics Program. The House's markup would reduce OE's budget by a further 8%, down to \$4.136 million, for a 34% total cut. The Senate markup would continue the 26% reduction and keep OE at the \$4.5 million mark for FY2025. Both of these budget reductions threaten the continued sustainability of USDA's Department-wide Ethics Program. Without additional funding in the FY'25 budget the Office of Ethics cannot afford its current staff, even under the Senate's \$4.5 million mark up. Simply put, the significant budget cuts to USDA's Ethics Program place in peril an already significantly understaffed Ethics Program that services 100,000 USDA employees across the country.
Q6. Most Air Force ethics offices did not have contractor support, but a few did. Q9. A few of one major command's subordinate installations reported a need for additional personnel within their offices. Several offices experienced personnel shortages due to retirements, resignations, and permanent change of station moves. Several offices reported a need for better technology so that an OGE Form 450 filer's completed initial or annual ethics training in SharePoint could be recorded directly in FDM. Q11. The inspection team from the Air Force Judge Advocate General's Office (AF/JAI) inspected some bases as part of the team's routine

<p>inspections in CY 2024. The recommendations listed in response to Question 12 are for those legal offices that underwent inspections. Q12. AF/JAI inspections identified issues with some ethics appointment letters at one base. The problems were corrected. Additionally, changes were implemented to address training and program accounting within a base Civilian Personnel Office and the Financial Disclosure Management (FDM) program.</p>
<p>11.a. Our agency underwent an annual financial statement audit performed by an Independent Public Accounting (IPA) firm. IPA firms are contracted by, act on behalf of, at the direction of, and in the name of Department IGs. Accordingly, IPA firms are performing audits pursuant to the statutory authority (Inspector General Act of 1978) of the Department IG that hired them. In this situation, IPA firms are not outside entities, they are performing Department IG internal oversight. During these audits the IPA firms may test the audited entity's compliance with ethics standards (5 C.F.R. Chapter XVI, Subchapter B., "Government Ethics").</p>
<p>Q.3 - Information provided refers to the individual who served as DAEO for all of CY 2024. Q.4 - Information provided refers to the individual who served as the ADAEO as of December 31, 2024. Q.6 - Only two organizations utilized contractor support for substantive ethics work. Q. 11 - DoD SOCO conducts Program Assist Visits/Reviews of each DDAEO agency/command every 3-4 years.</p>
<p>Q9: Many components request more full-time ethics officials (human capital) to assist with increasing amounts of complicated ethics questions. Components with large financial disclosure programs request more ethics officials to assist with timely review of reports. Technology assistance is requested by most components, particularly those with large financial disclosure programs, such as a system like Integrity for use with OGE Form 450 collection and review. FDOonline has limited use in DOJ because of its cost, and its consideration for purchase by more components is on hold due to budget constraints. Q10: EOUSA's Component Head communicated via memo to all ethics advisors thanking them for their service and emphasizing the importance of their work.</p>
<p>Q9. Four components reported needing additional human capital resources for their programs (BFS, IRS, TIGTA and SIGPR). Additionally, BFS indicated it needed additional technology resources.</p>
<p>#5 Additional up to .25 FTE is an OIG attorney who was delegated certain duties for OIG employees at the request of Senior OIG Counsel to further their independence of operations.</p>
<p>A team from the FDIC's Office of the Chief Information Security Officer performed Security and Privacy Control Assessment testing for the FDOonline system for calendar year 2024 in accordance with FDIC and Federal (NIST and FISMA) guidance. FDIC updated and tested its FDOonline disaster recovery contingency plan.</p>
<p>Re #7 - In 2025, OIG took over a number of responsibilities of their own ethics program and therefore there are now more agency employees performing ethics duties.</p>
<p>As a small agency of 22 federal employees, the ADAEO works directly with all 6 supervisors on a regular basis, and routinely provides ethics advice to all employees.</p>
<p>Financial disclosure program, including for the filing, review, and when applicable, public availability of public financial disclosure reports (5 C.F.R. § 2638.104(c)(8)(i)), Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. § 2638.303), Provision of</p>

initial ethics training (5 C.F.R. § 2638.304), Issuance of ethics notice to new supervisors (5 C.F.R. § 2638.306)
NARA did undergo a program inspection from OGE in 2024 and made programmatic changes as a result of the inspection. The Agency head reviewed the results of the inspection, recommendations, and the agency's responses to the recommendations.
#10: OGC regularly consults with NEH's Agency Head regarding ethics issues and changes in ethics regulations.
#2 the data is not included/classified
Question #5: The Agency's response to this question includes employees who were assigned to short-term details during the calendar year, as well as employees who worked part of the year, but does not include Agency administrative support for the ethics program (including from the Office of the Chief Information Officer, the Office of Human Resources, and the Office of Employee Development).
In addition to 1590 full-time employees, NSF had 278 full-time IPAs on board as of December 31, 2024.
Q10. During the Director's initial ethics training, the OGE ethics team provided an overview of the agency's ethics program.
In order to address high volume of departures during the transition process, and to ensure that all departing OSTP staff received a personalized and comprehensive legal departure briefing that focused on their specific situation, OSTP OGC provided to each departing staff person tailored written ethics guidance on post government restrictions and seeking outside employment. OSTP OGC also provided written guidance on the financial disclosures process and requirements, and the ethics trainings (noted above), including all ethics notices to new supervisors.
Question 10: The Office of General Counsel that includes the DAEO and ADAEO meet periodically with the Special Counsel and ethics is one of the topics discussed.
#2 Total number of employees is classified.
OGC has and will continue to provide training and guidance to new supervisors.
Q2: The number of OVP employees is defined to include staff of the Executive Office of the President, Senate employees, as well as detailees and assignees from other departments and agencies. The Vice President also chairs the National Space Council and OVP provides ethics support, so for the purposes of this questionnaire, their staff have been counted as well.
13. 5 CFR Section 2638.306 is not applicable to our agency.
OGE conducted a program evaluation
Q8: WHCO has provided some ethics support for the Office of Pandemic Preparedness and Response Policy, Office of the Vice President, Office of the National Cyber Director, National Security Council, and Council of Economic Advisors during 2024, although all of these components have their own ethics programs.

## PART 5. EDUCATION AND TRAINING

**Table 17: Q.14 Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. § 2638.303, provide the DAEO with the written confirmation required pursuant to 5 C.F.R. § 2638.310?**

*None*

**Table 18: Q.14 Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. § 2638.303, provide the DAEO with the written confirmation required pursuant to 5 C.F.R. § 2638.310?**

DOJ: The Director Departmental Ethics Office (DEO) provides the required written confirmation to the DAEO.
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**Table 19: Q.15 Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. § 2638.303?**

Standard of Conduct include the information 5 CFR2638303, have been provided to the Office of Finance and Administration to provide in all written offers. However, the DAEO was unable to confirm if all written offers included all the required information.
Inconsistent application by human resources officials
HR stopped including the required information at some point (unknown as to why). The deficiency was flagged in an OGE inspection so the process has resumed.
As a new office, OPR was still standing up its processes and structures. Including the information required by 5 C.F.R. § 2638.303 is now part of OPR's standard operating procedure when sending written offers of employment.
Changes in HR staffing

**Table 20: Q.15 Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. § 2638.303?**

*None*

**Table 21: Q.15 Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. § 2638.303?**

There were no offers of employment during this time period.
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**Table 22: Q.16 Initial Ethics Briefing**

We are in the process of creating ethics briefings and trainings.
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**Table 23: Q.17 Initial Ethics Training**

<p>Various reasons - lack of notification by HR, scheduling conflicts, ethics personnel issues</p>
<p>One employee was trained beyond the 3-month requirement due to an administrative oversight however, the employee received IET in 2024.</p>
<p>2 employees still yet to receive the training are within the 3-month requirement window and will complete the next scheduled training thereby timely satisfying the requirement. 1 employee still yet to receive the training completed the online version of ethics training as a part of the annual federally mandated training package however, the employee did not attend the new employee orientation's live ethics training. As a result, the employee will be enrolled in the March 2025 new employee orientation to meet the live ethics training requirement.</p>
<p>In response to this data, the DeCA Human Resources Workforce Development Chief conducted research into the data and identified that over 900 DeCA employees do not have an email in the Learning Management System (LMS) creating issues with notification of due dates/training. The Defense Logistics Agency is now researching this issue for DeCA so DeCA can resolve and increase access to LMS. Pursuant to 5 C.F.R. §2638.304, the DAEO excluded all non-supervisory DeCA employees at or below the GS-8 grade level, or the equivalent, from the requirement to complete the training presentation described in 5 C.F.R. § 2638.304(e)(1).</p>
<p>Notification of training requirements among service members is not as streamlined as it is for the civilian workforce, especially outside of Headquarters. Additionally, tracking IET completion at field offices has historically been decentralized and reported out only at the end of the CY. For 2025, the Ethics Program will bring IET tracking in-house to improve the rate of completion.</p>
<p>Occasionally there are employees who enter the agency and leave before taking their IET. Additionally, some employees enter the agency and go onto Reserve military orders or directly to school. We are not able to properly contact those individuals.</p>
<p>The numbers reflected above include all new DTRA civilian employees and service members. DTRA follows a best practice to provide IET to all new civilian and military personnel, including enlisted service members who previously received IET in the military and are not within the definition of employee contained in 5 CFR 2638.304(a). There were 8 service members who did not complete IET within their first 90 days, seven of which were enlisted members. There were two reason they did not meet the IET deadline. (1) The military members signed into DTRA as the gaining unit and then took 30 days PCS leave to complete their move, making it difficult to contact members while on leave. (2) Second, some service members were required to travel away from their duty site immediately after in-processing for mission requirements or to attend schools away from their duty stations. The combination of service members taking leave and/or traveling shortly after arriving at the Agency lengthened the time it took for them to attend IET. In the future, service members in those situations will be given the option to take an interactive online training course rather than the live virtual training.</p>
<p>Despite regular reminders and follow up notices, approximately 6.5% of employees required to complete Initial Ethics Training (IET) did so outside the 3-month window and an additional 8.2% did not complete the training. On the other hand, 85.3% of new entrants did receive</p>

Initial Ethics Training within their first three months and 91.8% received the training in their first year. We will continue to follow up with those who did not complete the training

1-One major command explained that shortages in both the personnel (CPO) and legal offices created communication breakdowns in ensuring accurate data was provided to the legal offices about the number of personnel who required training and the number who actually received training. Legal offices in this major command continue to work with their servicing CPOs to improve processes. 2-One major command had two installations with persons who did not receive IET within three months. One installation reported that in late January 2024 it implemented a new method for providing IET and during the process, missed 10 employees. They were able to identify and train 3 of the 10 employees later in the year when the employees were identified as OGE 450 filers. They are working to train the remaining 7 employees. The second installation in this command reported that it sent reminders to complete IET to all new employees. 2 employees completed their training beyond the 3-month requirement. 1 employee thought the Defense Acquisition University ethics training met the requirement. The other employee is a Security Forces patrol officer who worked nights. 3-A base in one major command had four filers who failed to provide completion certificates. One filer at another base experienced technical issues. One filer at a third base was deployed, and it was not discovered that he had not received training until a year-end review of the installation's training records. 4-Some field offices in one command did not have a mechanism in place for notification when new employees were onboarded. They have discussed the issue with their human resources office. The local HROs will add their Ethics Offices to the new employee supervisor's checklist so that they will be notified and be able to offer the training to all new hires going forward. Each local Ethics Office will receive a roster of new hires and make a training plan to provide ethics training for new hires in CY 2025. 5- Three subordinate offices in one command had filers who did not receive IET within 3 months. In one numbered air force, the Civilian Personnel Office (CPO) notifies new employees of their obligation to complete the training, and JA offers it every month, but CPO does not enforce attendance or follow up with delinquent employees. In one wing, due to leave and temporary limited manning (caused by deployment & parental leave) of JA personnel, employees who in-processed in September 2024 (total of 8 new hires and transfers) did not receive their IET during their in-processing. This issue was identified, and the employees received their IET beyond the 3-month requirement. In another wing, an uncontrolled fire and subsequent asbestos release in May 2024 at the headquarters building displaced all employees for 2-6 months. The Chief of Staff's office in the headquarters building is responsible for scheduling and hosting the newcomer orientations at which IET is given. Due to the fire, orientations did not resume until 6 months after the fire. This resulted in 28 personnel not receiving IET. 6-The legal office for a direct reporting unit lost its incumbent admin assistant in late 2023. An effective replacement was not hired until mid-2024. This person helped track and schedule new employee ethics orientation beginning in mid-2024. The churn in personnel led to some regular new employee training sessions falling off the calendar. The unit is back on track for 2025. 7-One unit has one employee who has failed to respond to emails about training. The ethics official has notified the supervisor. 8-One major command missed employees of the numbered air force. The command has coordinated with its numbered air force, who will help provide early identification of the employees who require IET.

<p>Some employees discontinued their Federal employment within 90 days of appointment without completing initial ethics training. Some of the initial ethics training was entered as annual ethics training in the training database. Some HR offices continued to be challenged with providing timely HR notification of new employees to the relevant ethics offices. Reorganizations, HR and ethics personnel turn-over, and ethics counselor unfamiliarity with IET provisions also played a part. However, we have placed new emphasis on this requirement at our annual Ethics Officials Course this year. The Army is in process of providing IET to these personnel.</p>
<p>Employees did not respond to onboarding instructions which directed them to IET Connectivity issues, work tempo and IT issues complicated efforts new training version was released in Summer 2024 which caused confusion regarding which module to complete HR did not timely notify regarding onboarding employees</p>
<p>The one employee that did not complete her IET within the 3-month requirement separated from the agency before the 3-month due date.</p>
<p>Q.17.ii “ Component agencies/commands reported challenges meeting the deadline due to issues with technology and term/seasonal/part-time personnel who did not have access to government computer systems. One agency experienced a very significant increase in personnel, along with a subsequent reorganization of the agency's organizational structure. Q. 17.iii “ See response to 17.ii. Also, the component agencies/commands have taken corrective actions and identified the personnel who have not received IET. The agency that experienced a large influx of new personnel and a reorganization has developed a reliable tracking system and is continuing to assign IET to all CY 2024 new personnel who have yet to be trained.</p>
<p>Employees came on board in December 2024.</p>
<p>One employee is on leave of absence. Following up with program office regarding other employees. The Department utilizes an online platform to administer initial ethics training for all employees, as defined in 5 C.F.R. 2638.304(a). The online platform sends each employee multiple automatic notifications at prespecified intervals to complete initial ethics training during the employee’s first 75 days. The Department sends additional reminder emails to the employees who have not completed initial ethics training by the employee’s 76th day and continues to follow up with the employee and management, as necessary. The Department followed these protocols for each employee who received initial ethics training beyond the requirement and for those employees that have not received initial ethics training as of today.</p>
<p>Primary reasons include technological problems accessing the HHS Learning Management System, confusion between IET and AET requirements, and administrative oversight.</p>
<p>Several components experienced delays in IET completion due to OCHCO on-boarding process changes and unexpected delays in deployment of a new online Learning Management System.</p>
<p>Scheduling conflicts including extended leave and some attorneys were in trial or on travel, some minor confusion over course selection in LMS, communication delays, administrative or bookkeeping errors</p>
<p>Employees have not completed online training and will continue to receive notices to complete.</p>
<p>We were optimistic that the number of employees taking IET beyond three months in 2024 would decrease significantly due to the implementation of a new electronic notification</p>

system that was activated in mid-December 2023. The number of employees satisfying the requirement to take IET within the 3-month period in 2024 did improve slightly (thus, the percentage of employees who took IET beyond 90 days decreased from 8% in 2023 to 4% in 2024). We continued, however, to notify many employees of the requirement to take IET manually. We will continue to work with the human resources bureau and the Foreign Service Institute (The Department's training facility) to enhance the electronic notification system, to ensure that new employees are promptly informed about the requirement to complete IET on time, and to improve compliance.

Employees who received and completed IET beyond the 3-month requirement did so due to inadvertent oversights in tracking or because the employees were on extended medical or parental leave, or on unpaid leave, furlough, or suspension. In addition, many employees who have not received and completed IET as of today did not do so because they terminated employment before completing IET. This group was primarily composed of seasonal or temporary employees.

Of the three employees who have not yet received IET, one student trainee is on irregular schedule and currently LWOP one rehired annuitant is on irregular or periodic work schedule and currently on LWOP and one employee did not receive notice of required training in a timely manner. For the 14 who receive IET beyond the 3-month requirement, some were on military leave, some were student trainees with no access to the website until after their training, and some were due to a lack of manager follow-up. One of our OAs sends an email to all new hires at 30 and 15 days before the deadline. These emails contain a note to the employee's manager and continue with follow-up emails until the training is completed.

Factors including: miscommunication of the specific training course that was to be completed not able to locate training in learning plan training not appearing in the overdue section attending live training as part of new hire orientation and not properly receiving credit major system glitch where credit was not provided and credit had to be manually added by ITM (who were short staffed).

Annual ethics training is assigned electronically in VA's Talent Management System (TMS). EST does not track individuals, rather supervisors monitor their employees and the system reports completion. EST's annual financial disclosure report filing communications are used as an opportunity to amplify and remind filers of their training requirements. There is a remaining difference in these numbers, and are accounted for as follows: there is a large cohort of employees that required training, and are not yet trained, but also not yet over 90 days. Essentially, those employees were hired between October 1 and December 31. VA hired large numbers of employees this year with additional funding derived from the enactment of the PACT Act.

The EPA initial ethics training module is part of the online suite of mandatory training courses for all new employees. Since our recent improvements to the ethics dashboard, DEOs can now see "at a glance" all of their new employees by name and entry-on-board dates, as well as their initial ethics training completion status. During our monthly ethics conference calls, we draw their attention to these trackers to encourage DEOs to keep after their employees who are not completing their training assiduously. As a result, we have seen a marked decrease in the percentage of new employees who did not complete their training within three months. In drilling down to why there may be a lapse, we identified the following causes: (a) human error

<p>in the coding of a person as “new” when actually, the person just moved from one office to another within EPA, (b) the employee is a new e450 filer but not new to the Agency (c) the employee left EPA before completing the training or (d) the employee accidentally took the wrong ethics course. In the increasingly rare instance of a new employee simply not taking the IET, EPA Ethics is reminding the affected DEOs about this compliance requirement.</p>
<p>Of the two employees who did not receive IET within 3 months, the ethics staff did not learn of their hiring dates until the three-month period had expired. Both employees completed IET within 4 months of their hiring dates.</p>
<p>The FCA Training Office assigns all mandatory training to new entrants, including the ethics training, through a learning management system. The Training Office inadvertently failed to assign two employees the mandatory new entrant ethics training. This error was discovered when the ethics office conducted an audit, and the two employees were then assigned and completed the IET.</p>
<p>Two employees are student trainees who went on leave before timely completing training.</p>
<p>Had trouble accessing the FSI online training. We provided employee with in person training and training was received only a few days after the due date.</p>
<p>We are in the process of creating ethics briefings and trainings.</p>
<p>All new NASA employees are notified of their obligation to complete initial ethics training (IET) within 90 days, and instances of late initial ethics training beyond ethics program control were rectified within the calendar year.</p>
<p>All employees receive an in-person ethics briefing as part of the orientation on their first day at NARA. Employees are also required to complete an ethics training within the Learning Management System. We are following up on the remaining employees identified as not having completed the training in the Learning Management System.</p>
<p>Administrative issues -- training assigned late.</p>
<p>The numbers reported in 16 and 17 above are percentage (i is 99.5, ii is .4, and iii is .1). Actual numbers are made available to cleared OGE personnel when required. One new hire did not complete training at all. The employee went on extended leave almost immediately after entry on duty and did not come back in 2024. A small number of new hires in the field were tasked with initial training but did not complete timely. The ethics office followed-up with each to ensure completion.</p>
<p>Notifications of overdue IET requirements have been sent to the individuals and their supervisors and will be pursued until IET is completed.</p>
<p>The one employee was invited to initial ethics trainings. Failed to attend. Resigned after six months.</p>
<p>Two OMB employees were unable to attend IET within 90 days of arrival due to work conflicts. Both of these employees took IET within 120 days of arrival.</p>
<p>Agency HQ evacuated for almost 2 weeks due to building health concern. Employee completed IET upon return to office.</p>
<p>The employee who received IET beyond the 3-month requirement was a prior employee of the agency who was rehired in January 2024. Due to an oversight, new employee training was not assigned when the employee was rehired. The employee received IET when the oversight was discovered.</p>

The DAEO serving in 2024 no longer works for the agency as of 12/31/24. Current ethics staff do not have information on why the employee was not trained within the first 3 months.
All newly hired SSA employees have completed initial ethics training. Of the agency's 1,727 new hires, only 9 completed the training outside of the required 3-month period. Some of the 9 employees who completed initial ethics training late were on extended leave during the 3-month period. The Ethics Law Division escalated any noncompliance to the highest levels of management. Management officials ensured that those few employees took the training as soon as they were able to do so.
ii. 1 of the 3 employees was on leave. 2 of the 3 employees were plant personnel who do not have access to a computer on day-to-day basis. All 3 past due employees were immediately locked out of the TVA network once the 90th day passed and unable to gain access until the ethics training was completed. iii. 4 employees were employed for less than 90 days
The Commission contracts with USDA to use their online AgLearn training portal to conduct both initial and annual ethics training. In fall 2024, the Commission's AgLearn Administrator was removed from Federal service and an alternate Administrator had to be identified by the Commission and then credentialed through USDA's AgLearn Administrator process. After credentialing, however, there was an oversight between the ADAEO who alerts the Administrator to needed training and the new Administrator to assign the training. Although ultimately untimely, the employee, a previous OGE 450 Filer from another agency, received 1-on-1 initial ethics training from the ADAEO to ensure that initial ethics training was completed.

**Table 24: Q.18 Did the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required written confirmation to the DAEO, pursuant to 5 C.F.R. § 2638.310?**

*None*

**Table 25: Q.18 Did the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required written confirmation to the DAEO, pursuant to 5 C.F.R. § 2638.310?**

*None*

**Table 26: Q.19 Did the head of the agency complete either initial ethics training and/or annual ethics training in 2024?**

Annual ethics training was sent to all staff on 12/4/24 with a due date of 12/31/24. The Executive Director resigned from agency effective on 12/31/24 but did not submit the required training. The Executive Director was given Post-Employment Ethics Training and other ethics consultations before departing the agency.
Pursuant to 5 U.S.C. Â§ 424(b)(2)(B), the Chairperson of CIGIE is elected from among the Inspector General members of CIGIE and, accordingly, receives his or her initial ethics training from his or her employing agency.
due to scheduling conflicts

Head of Agency had competing priorities and was unable to schedule formal Annual Ethics training, but DAEO did meet to explain post government employment rules.
We are in the process of creating ethics briefings and trainings.
The Agency head did not complete annual ethics training in 2024.
Initial ethics training not required, annual ethics training not provided

**Table 27: Q.19 Did the head of the agency complete either initial ethics training and/or annual ethics training in 2024?**

Was confirmed in 2022 and did not have to complete training
Given the size of the office, we don't conduct annual training however the DAEO and ADAEO conducted review of the agencies program that included gathering information about new developments.

**Table 28: Q.20 Required Annual Ethics Training**

One employee resigned from the agency on 12/31/24 without providing proof that the training was completed. A second employee was granted provisional FMLA leave on 12/23/24 and did not provide proof of completing required training.
Five confidential filers were on extended leaves of absence and were unable to finish training.
The one public filer who did not complete ethics training was provided a copy of the interactive training materials on 11/27/2024. Ethics staff emailed a reminder on 12/12/2024, on 12/31/2024, and again on 1/21/2025.
One public financial disclosure filer (OGE Form 278e) had not completed training by the end of the calendar year. That employee was in a parental leave status and will complete training when they return to duty. Eight confidential financial disclosure filers (OGE Form 450) had not completed training by the end of the calendar year. All of those filers have been and continue to be on parental or other long term health-related leave. Four employees who are not designated as financial disclosure filers had not completed training by the end of the calendar year. All four of those filers have been and remain on parental or other long term health-related leave.
Q20.b. The one public filer who did not complete training was on medical leave without pay, pending disability retirement, for more than 11 months of CY24. Q20.d. Training completion for employees who are not financial disclosure filers is left to the oversight of supervisory chains rather than the Ethics Program.
6 of the Confidential Financial Disclosure filers were granted exceptions for extended medical leave, military deployments, and reservists on military orders.
Despite regular reminders and follow up notices, a small percentage (~1.5%) of employees did not complete the training. We will continue to follow up with those who did not complete the training. We would note that 98.1% of employees did receive the required annual ethics training.

<p>Discrepancies in the data are due to several factors. The confidential filer annual ethics training was offered online through the Department of Commerce's online training portal. The public filer training was offered through live remote meetings and presented by an Ethics Law and Program Office attorney. Both annual trainings were conducted during the final 1/4 of 2024. Some individuals were unable to complete the ethics training due to extended leave, some retired or otherwise separated from employment during the last 1/4 of 2024 without completing the training, and a small number were unable to attend due to scheduling difficulties due to time zone differences (as was the case for a few public filers with duty stations in Asia and Europe).</p>
<p>1-One MAJCOM provided the following reasons explaining why some of their filers did not complete annual training: a) filers are on extended medical, maternity or paternity leave and expected to complete the training when they return. b) filers ignored numerous reminders to complete the training and have been referred to their supervisors for administrative action as appropriate. c) filers departed their organizations without completing the training and were no longer Confidential Financial Disclosure Report filers. 2-One command believes that some filers left the command before receiving training, but the training assignment was not removed, so the filers appeared delinquent on the spreadsheet. Continued in Additional Comments</p>
<p>Extended medical and military leaves, overseas deployments, and inaccurate accounting cover some of these discrepancies. Additionally, the communication from Human Resources personnel and Ethics Officials concerning new hires that are financial disclosure filers needs improvement. As stated in question 12, we have developed a system of notification from the Army Civilian Human Resources Agency (CHRA) directly to Army OGC of all new entrant filers across the Army Enterprise. We now receive these new filer lists in a searchable and sortable excel worksheet every pay period. We then distribute to the appropriate DDAEOs who in turn, distribute to local installations' and organizations' ethics officials. We expect this to significantly improve our new entrant financial disclosure filer tracking.</p>
<p>Employees on extended leave training platform changed mid-year, and employees had difficulty logging in to new system to complete training some employees failed to complete AET in timely manner despite reminders from ethics officials and HR</p>
<p>Primarily due to extended leave, deployments, departure of personnel.</p>
<p>1 confidential filer on detail. 1 confidential filer on extended sick leave 12 public filers delinquent.</p>
<p>278 filers: 20 employees are delayed in completing their AET because the online training system did not include their current email addresses. They have since been notified to complete the training and GC-21 is tracking their completion. 4 political appointees and two non-political appointee received numerous notifications regarding their annual ethics training requirement however, they detached from the agency in early 2025 without completing their training, and 1 extenuating circumstance. 450 filers: 26 employees have extenuating circumstances.</p>
<p>Most employees who have not yet completed training are on extended leave and will complete training on return. Supervisors of noncompliant employees have been contacted.</p>

<p>Several of these employees are on extended medical leave, suspended from duty, or on military leave. Others have been referred to management for consideration of appropriate action to remedy non-compliance.</p>
<p>In an effort to obtain compliance, multiple reminders of the requirement to take Annual Ethics Training were sent to employees to help achieve compliance. Notices were also sent to employee's Administrative Officers and then the employee's supervisors in order to help achieve compliance. One employee was on maternity leave until January 2025, two employees are on detail and should have received training at their detailed agency, one employee was on extended military leave, and 4 employees were on extended or sick leave. 1 employee is on extended detail and completed the necessary training on 1/15/2025.</p>
<p>Left DOJ prior to taking annual training, long term leave status, technology irregularities or confusion with LMS offerings, inadvertent mistake in notification and/or record keeping, death of filers. Ethics officials consistently follow up on all outstanding ethics training to ensure compliance.</p>
<p>Training was offered for 10 dates in 2024. Some employees departed the agency prior to training began. Also some did not attend because of leave and scheduling conflicts as well as extended leave that prevented attendance.</p>
<p>In 2024 we had a significantly higher number of annual filers. The Department Ethics Office and management officials reminded filers to take Annual Ethics Training (AET) several times over the course of the year, including by the report reviewers individually. The Foreign Service Institute (The Department's training facility) hosts the online annual training course. Each year many filers wait until the end of the calendar year and then, many encounter technical issues with FSI system access, particularly new annual filers taking the course for the first time. To address this, we adopted a new approach in 2024 with the issuance of the updated 11 FAM 620. Filers are now directed to complete the course no later than December 1 each year. In addition, we continue to seek technological solutions to better monitor compliance and to make accessing the online course easier for employees no matter where they are located.</p>
<p>Discrepancies between the number of employees who were required to receive annual ethics training and the number of employees who actually received the training are attributable to a variety of factors, including inadvertent oversights in tracking, challenges with learning management software, and employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status.</p>
<p>Many filers were on extended military or medical leave and will receive their training when they return to office.</p>
<p>Employees were on long-term leaves of absence (military, parental, and medical).</p>
<p>VA was 100% (744/744) for public filers receiving the required annual ethics training for CY 24. All other VA employees are required to take annual ethics training in VA's Talent Management System (TMS) system and 91% completed the training. The supervisors monitor the individual employee's compliance with this agency wide requirement. Some of the variances can also be addressed through maternity, paternity, extended sick leave and military service.</p>

<p>Only one public filer did not complete annual ethics training (due to extended leave), while 99% of all confidential filers did. Reasons that confidential filers did not complete training include: departure from the Agency, extended medical leave, or military deployment.</p>
<p>The four 450 filers who did not receive annual ethics training were on extended leave during the period annual ethics training was presented. Their medical leave lasted through December 31, 2024.</p>
<p>(b) One public filer was on paternal leave during the training period, and through the end of the year, and is now an ex-employee, having no chance to take annual training. The two other public filers did not take training despite multiple offerings.</p>
<p>Two employees failed to timely complete their annual ethics training.</p>
<p>Two employees were on administrative leave, 16 employees were on leave without pay, and 20 employees were on medical leave.</p>
<p>One individual did not complete the training by the 12/31/24 deadline. He has since completed the training.</p>
<p>With regard to 450 filers, those who did not take the training were either on extended sick leave, military leave, maternity leave, retired, detailed to another agency or deceased.</p>
<p>One employee did not complete their training by 12/31/24. Their manager has been contacted.</p>
<p>New Board SGE Member completed training in January 2025.</p>
<p>Six employees were on parental leave during the online training season. All six completed the training in January 2025, after they returned to the office. One employee remains on extended administrative leave and has not done annual ethics training. Three employees were on parental leave during the online training season and have still not returned to the office. All four of those persons will be directed to complete annual ethics training when they return to the office.</p>
<p>2 on military leave.</p>
<p>12 employees did not complete annual training</p>
<p>Lack of resources to develop a briefing prior to new agency head being hired in October 2024. We are in the process of creating ethics briefings and trainings.</p>
<p>Reasons for discrepancies included parental and maternity leave, leave without pay status, and extended military leave for active duty.</p>
<p>Three employees were identified as OGE 450 filers at the very end of the calendar year, after the annual ethics training had concluded for the year. They will be included in annual trainings moving forward. One employee who files an alternate financial disclosure form had not confirmed training, so we will follow up on that.</p>
<p>One employee left the agency in early 2025 before completing training. Two employees are on extended medical or military leave.</p>
<p>There was one employee who was not able to complete the training on time.</p>
<p>Two confidential filers were on extended leave in 2024 and did not complete the required annual training before the end of the calendar year. Both employees promptly completed the annual training for 2024 in January 2025 when they returned to duty status.</p>

<p>OIG manages its own 450 program, but the NSF ethics office is responsible for training. Training requirements for two OIG filers were identified and added late. A third 450 filer, who is an SGE, was on parental leave through early 2025.</p>
<p>The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. For the filers who did not complete annual ethics training, the ethics office is reviewing the individual circumstances and reaching out to filers and their supervisors to ensure the training is completed where required.</p>
<p>Discrepancy primarily due to scheduling conflicts with NSC group training sessions during administration transition before most filers departed government service. ADAEO also covered key ethics issues in departure debriefs. Overall numbers include those who attended training with NSC or home agencies.</p>
<p>Two employees did not complete the training by the end of CY2024 due to scheduled leave. However, both employees completed the training upon their return to the office in January 2025. The NTSB requires all agency employees to receive live annual ethics training. Five employees were unable to receive live training. Three received interactive training during CY2024. The two remaining received the interactive training in January 2025 (as stated above).</p>
<p>Some discrepancy is due to employees being on annual or medical leave. Several employees have since completed the 2024 required training in January. Outstanding training requirements are being pursued through notifications to the individuals and their supervisors.</p>
<p>One employee refused to respond to invites and emails. Employee has since left.</p>
<p>Five OMB employees were unable to complete their AET due to being on extended leave from the time annual training was first offered in 2024 through the remainder of the year. These employees will take annual training upon their return to OMB.</p>
<p>One employee was detailed outside of the agency to another office and will complete training upon their return to ONDCP.</p>
<p>One public filer was on extended leave and two confidential filers were on extended military leave.</p>
<p>The ADAEO and the OGC staff sent notices to staff, including reminders, requiring that staff complete their annual ethics training. The DAEO and the agency head did not communicate the requirement, nor underscore the importance of completing the training to staff to ensure that all staff completed their annual ethics training. For example, the DAEO did not complete the annual ethics training.</p>
<p>Per above: (b.) An ONCD employee was detailed to another agency. According to that agency's practice, they assumed responsibility for the Detailee's reporting requirements (d.) In 2024, on numerous occasions, ONCD offered ethics training to its employees. These trainings were offered by OGC, White House Counsel's Office, and/or other components.</p>
<p>Due to understaffing in the ethics office, training reminders were not sent out in the days leading up to December 31, leading to under-completion of the training requirement.</p>
<p>One employee was on extended leave.</p>
<p>One public filer was on leave in 2024, and completed their 2024 annual ethics training in January 2025.</p>

Three Board Members are part-time SGEs and did not complete annual ethics training
Eight OGE 450 Filers were on extended leave during CY 2024 and have not yet returned. Upon their return, OEC will ensure they complete the training.
Three employees did not complete the training for the following reasons: 1) Two employees are on extended medical leave 2) One employee is on military leave
5 employees took the ethics training late, in January 2025, but were locked out of the TVA network and unable to gain access until the ethics training was completed 4 employees were promoted to managers prior to their 2024 ethics training due date. Upon promotion, they were assigned ethics training specifically for supervisors and managers and their due dates were pushed back to February 2025. 1 employee is on leave and is locked out of the TVA network and unable to gain access until the ethics training is complete.
There were technical difficulties in determining whether one OGE 450 report filing employee was still billeted with the agency before the close of the year. That issue has been resolved and the employee will receive make-up training at the start of 2025. As of the filing of this questionnaire, that filer has complied with receiving ethics training.
It is likely many more 278 filers received training but I was unable to compare every name in our integrity system to all attendance training that was tracked overseas. In addition, many Foreign Service employees go on home leave (for up to 90 days) at the end of the year when annual ethics training is regularly held. USAID has tried to rectify this deficiency by holding trainings throughout the year.
One confidential financial disclosure report filer is on extended parental leave. This filer is expected to complete the training as soon as practicable after returning to a full duty status. One confidential filer had a serious health setback and completed the training in January 2025. Two confidential filers terminated employment in January 2025 and did not complete the training.
All filers were provided the opportunity to attend one of six live sessions for annual training. Unfortunately, due to changes in personnel in the Ethics Office, many of those sessions were during the holiday season and some personnel were unable to attend.
Several filers had scheduling complications (i.e. long-term leave, parental leave, etc.) and are scheduled to complete the required annual training upon availability.

**Table 29: Q.21 Did your agency establish additional requirements for the agency's ethics education program, pursuant to 5 C.F.R. § 2638.309?:**

Annual ethics training is required for all employees, including non-covered employees.
DCAA requires all 0511 employees to complete annual ethics training (AET). Do we have the number of employees who are not designated filers that completed the training? For example, last year we had 2675 employees complete AET, but who were not required to file OGE-450s.
DLA ethics officials need to complete 1 hour of ethics training, beyond annual ethics training per year. New ethics officials need to perform 6 hours of training. PEP is encouraged. For all annual filers, they must attend live, leader-led training.

The Army continued its DAEO-mandated Ethics Official continuing education program, requiring a minimum of one hour of additional ethics training for all ethics officials. Generally this year, that continuing education focused on recent changes to the Joint Ethics Regulations and 5 CFR Parts 2635 and 2601. Also, inspectors general, financial, and acquisition professional preformed annual ethics training.

The DAEO has delegated certain duties to certified ethics counselors. In order to be certified as an ethics counselor, the DON attorney must complete a minimum of eight hours of training in the core ethics/standards of conduct subject areas (e.g., conflict of interest, financial disclosure, post-Government employment, gifts, use of Government resources, misuse of position, and relations with non-Federal entities). Additionally, certified ethics counselors must complete one hour of annual refresher training.

DoD established initial and annual training requirements for all DoD ethics officials to ensure ongoing professional development. Some component agencies/commands require all personnel to receive training. Various agencies/commands also provide specialized training to senior leader staff and supervisors. DoD has an established policy preference for live, leader led training to the maximum extent practicable and requires that PAS officials receive live initial ethics briefing within 7 days of appointment. DoD established a requirement for DoD DAEOs and component agencies/commands to establish procedures for certifying compliance with the training requirements for DoD ethics officials on an annual basis.

New Deputy Ethics Counselors (DECs) and Ethics Coordinators (ECs) are required to complete an orientation training with Ethics Division attorneys. The Ethics Division holds three quarterly trainings and an annual workshop for ethics officials, which DECs and ECs are required to attend. One component requires new ethics officials to complete OGE's web-based ethics training plan. Most components require all employees to complete annual ethics training. At the time the data was compiled, 36,063 non-covered employees completed AET. Some components require new employees to attend an ethics orientation, in addition to completing HHS's IET. One component requires employees who are preparing for deployment or assignment outside the agency to complete an ethics refresher training. The Ethics Division provides many optional trainings throughout the year including a training series for new ethics officials, financial disclosure reviewer trainings, a new supervisor training, topical trainings open to all HHS employees, and, on request, topical trainings to individual components. Additionally, ethics officials in many components offer mandatory or voluntary trainings to their employees. Many components include ethics information in regular emails to employees or in component newsletters.

In CY 2024, the DEO provided additional mandatory training for employees providing ethics duties, including a three-day virtual Ethics Summit. The Ethics Summit provided employees performing ethics duties with information on relevant topics in the core ethics areas of financial disclosure, advice and counsel, and training, and also highlighted available ethics resources and best practices across the Executive Branch. Prior to the start of confidential and public financial disclosure season each year, the DEO provides reviewer and administrator training to all ethics officials with financial disclosure responsibilities. Further, under the authority established by 5 CFR 2638.307(a)(4), additional DOI employees were designated as covered employees and required to completed annual ethics training. In

In addition, any employees required to complete IET and AET were also required to complete training on the Department's supplemental regulations. Ethics officials also provided training to employees on a number of targeted ethics topics including the following: seeking and negotiating for employment, post-government employment restrictions, the Hatch Act, the Hatch Act and official communications, and the Ethics Toolkit for Researchers and Scientists. DEO ethics officials also provided training to focused groups of employees on relevant topics, including new SES officials, new supervisors, executive assistants, SGEs, IPAs, and interns.

At the beginning of every weekly Administrator's senior staff meeting, the ADAEO provides an "ethics minute" and also writes an "ethics corner" for the weekly newsletter that was sent to all EPA political and administratively determined appointees. EPA Ethics also regularly provides ethics training to EPA's LEGIS fellows and also to the Brookings Institute for all of the federal agencies' LEGIS fellows. We provide training to the EPA Designated Federal Officers in charge of FACA committees and also, upon request, to the FACA committees. We also provide training to interns and law clerks, whether paid or unpaid, and as needed or requested by offices and employees on all aspects of the federal ethics laws and regulations and the Hatch Act. This year, we also provided several ethics offboarding sessions for P46 appointees.

Employees who are not required to file 450s or 278s receive annual ethics training along with required filers at the agency. The DAEO requires that our Advisory Council certify annually that they understand and are abiding by the applicable ethics rules and have reviewed the IAF SGE Ethics Guidance.

Internal training for OGE 450 and OGE 278e reviewers

Contracting officers and IT professionals who work as or supervise contractors are required to complete specialized training: "The Government-Contractor Relationship at NSF." In addition to completing initial ethics training, new program officers are required to attend a merit review basics course where they receive an additional hour of ethics training geared toward managing their conflicts of interest (COIs) and merit review panel COIs. All incoming employees (not SGEs) were required to complete a sponsored travel course.

Yes. The agency updated the initial ethics training, and the annual ethics training, and reviewed the Human Trafficking Awareness training to make sure that the information provided were current and relevant. After the updates, the agency provided these trainings to all staff.

All TVA employees are required to take annual ethics training. Staff augmented and managed task contractors are not required but are strongly encouraged to take the training. In addition, TVA Supervisors/Managers and Officers/Executive-level employees are required to take an additional module as part of the annual online ethics training.

In ethics trainings, we also covered outside activities, community service activities, endorsements, special access issues, anti-nepotism, and the Hatch Act.

DFC Ethics training policy states that all employees will be asked to attend annual ethics training in the year(s) after onboarding. Other than employees who require live training annually, all employees are offered live training and interactive training in alternating years.

**Table 30: Q.21 Did your agency establish additional requirements for the agency's ethics education program, pursuant to 5 C.F.R. § 2638.309?:**

All contractors are provided annual Ethics Training material as well as Partners abroad, involved substantially, in agency operations. Certification procedures exist.
We provided OGE's 2024 Hatch Act guidance to all staff. We also required travel training for all staff.
Annual ethics training is required for all employees, including non-covered employees.
Contracting Officer's Representatives (CORs) receive ethics briefings as part of their periodic COR training. In addition, ethics staff send supplemental guidance and meet individually with departing senior employees subject to 18 U.S.C. 207(c) to explain post-employment ethics restrictions.
All OGC Attorneys.
The CSB now trains all civil servants two times per year, effectively doubling the amount of training time.
The Commission's ethics officials sent annual ethics training to regular full-time employees to complete as an optional training. Commission ethics staff also send out a bi-monthly, educational newsletter informing agency employees on ethics news/updates, upcoming filing deadlines, and trainings. This fall, prior to the federal election, Commission ethics staff delivered an agency-wide training on the Hatch Act. The training was attended by nearly every employee at the agency.
CEQ provides live interactive initial, annual, and Hatch Act training to all employees, including detailees.
DeCA established additional training requirements for other groups of employees beyond those described in 5 C.F.R. §§ 2638.303-308 (notices to new employees and supervisors, initial ethics training, ethics briefings, annual ethics training) and tailored ethics content to different audiences. DeCA provides routine training required to be completed by store management personnel. This includes an ethics training for all DeCA Area and Zone Managers at DeCA Headquarters. The customized training is interactive and conducted in person by the General Counsel and staff. Training covers required ethics topics as well as an emphasis on ethics issues routinely encountered by employees at the store level.
All employees, not just confidential financial disclosure filers, complete annual ethics training. We also provide live training to all public financial disclosure filers every year. In CY24, all Acquisition Workforce positions were required to take an additional training on Ethics in Hiring, with a focus on Sec. 1117 of the FY22 NDAA.
DLA ethics officials need to complete 1 hour of ethics training, beyond annual ethics training per year. New ethics officials need to perform 6 hours of training. PEP is encouraged. For all annual filers, they must attend live, leader-led training.
The DAEO required all agency employees to attend live annual ethics training.

The Army continued its DAEO-mandated Ethics Official continuing education program, requiring a minimum of one hour of additional ethics training for all ethics officials. Generally this year, that continuing education focused on recent changes to the Joint Ethics Regulations and 5 CFR Parts 2635 and 2601. Also, inspectors general, financial, and acquisition professional preformed annual ethics training.

The agency head determined it essential for all OIG employees to participate in annual ethics training due to the agency's oversight responsibilities. This decision was made with advice and counsel from the DAEO.

DoD established initial and annual training requirements for all DoD ethics officials to ensure ongoing professional development. Some component agencies/commands require all personnel to receive training. Various agencies/commands also provide specialized training to senior leader staff and supervisors. DoD has an established policy preference for live, leader led training to the maximum extent practicable and requires that PAS officials receive live initial ethics briefing within 7 days of appointment. DoD established a requirement for DoD DAEOs and component agencies/commands to establish procedures for certifying compliance with the training requirements for DoD ethics officials on an annual basis.

The DAEO established ethics counselor training requirements for all ethics officials at the Department of Energy. Each ethics official must complete four hours of ethics training each calendar year, whether it is through the Institute for Ethics in Government or another source that offers training relevant to providing ethics advice and counseling. Political initial ethics training. Non-PAS political appointees receive live initial ethics training.

New Deputy Ethics Counselors (DECs) and Ethics Coordinators (ECs) are required to complete an orientation training with Ethics Division attorneys. The Ethics Division holds three quarterly trainings and an annual workshop for ethics officials, which DECs and ECs are required to attend. One component requires new ethics officials to complete OGE's web-based ethics training plan. Most components require all employees to complete annual ethics training. At the time the data was compiled, 36,063 non-covered employees completed AET. Some components require new employees to attend an ethics orientation, in addition to completing HHS's IET. One component requires employees who are preparing for deployment or assignment outside the agency to complete an ethics refresher training. The Ethics Division provides many optional trainings throughout the year including a training series for new ethics officials, financial disclosure reviewer trainings, a new supervisor training, topical trainings open to all HHS employees, and, on request, topical trainings to individual components. Additionally, ethics officials in many components offer mandatory or voluntary trainings to their employees. Many components include ethics information in regular emails to employees or in component newsletters.

The Secretary determined annual ethics training was mandatory for all HUD employees, not just financial disclosure filers.

In CY 2024, the DEO provided additional mandatory training for employees providing ethics duties, including a three-day virtual Ethics Summit. The Ethics Summit provided employees performing ethics duties with information on relevant topics in the core ethics areas of financial disclosure, advice and counsel, and training, and also highlighted available ethics resources and best practices across the Executive Branch. Prior to the start of confidential and

public financial disclosure season each year, the DEO provides reviewer and administrator training to all ethics officials with financial disclosure responsibilities. Further, under the authority established by 5 CFR 2638.307(a)(4), additional DOI employees were designated as covered employees and required to complete annual ethics training. In addition, any employees required to complete IET and AET were also required to complete training on the Department's supplemental regulations. Ethics officials also provided training to employees on a number of targeted ethics topics including the following: seeking and negotiating for employment, post-government employment restrictions, the Hatch Act, the Hatch Act and official communications, and the Ethics Toolkit for Researchers and Scientists. DEO ethics officials also provided training to focused groups of employees on relevant topics, including new SES officials, new supervisors, executive assistants, SGEs, IPAs, and interns.

DO requires Financial Disclosure Filers who on-boarded prior to June 1 to also take the Annual Ethics Training, which is conducted during the Fall all new Supervisors must also complete an interactive ethics training module. BEP requires all employees who will be traveling outside the US on official travel to receive an ethics briefing. FinCEN and the US Mint requires all employees to receive annual ethics training.

In coordination with the Office of Secondary Market Oversight, the Ethics Office offers additional ethics training specific to employees providing oversight of Farmer Mac to ensure that they are aware of their heightened ethical responsibilities. The training assists employees to ensure that they are conflict-free before engaging in Farmer Mac oversight activities. The training is online and accompanied by a form that employees sign and certify that they understand the ethics rules. This training is repeated annually for employees assigned to Farmer Mac oversight activities. We also required non-commissioned examiners, who are not typically required to complete annual ethics training, to complete annual ethics training in 2024 to ensure that employees with oversight activities understand their ethical obligations.

All employees were assigned to receive Annual Ethics Training.

All Commission employees not just financial disclosure filers are required to take the Annual Ethics Training.

FHFA requires all employees to complete annual ethics training (this does not include individuals who received new employee ethics orientation in 2024).

Certain groups must receive annual ethics training regardless of their GS-levels and responsibilities (e.g., all staff who work in Commissioner offices). Managers throughout the FTC have also designated certain persons for mandatory annual ethics training based upon the nature of their responsibilities, degree of independence, etc.

All GSA employees were required to complete annual ethics training. We also sent an annual reminder to managers and supervisors about their ethics responsibilities.

All employees who serve as evaluators for procurements are required to complete a training. In addition, starting in CY 2020 all agency employees were required to complete an annual refresher training course in a number of subjects critical to NARA's mission, including an ethics component. Finally, the Archivist's Management Team - approximately 20 senior officials - receives quarterly ethics briefings.

Annual ethics training was mandatory for all NCUA employees in CY2024, regardless of financial disclosure filer status.

We required separate Hatch Act training which was in addition to covering the Hatch Act at the annual training.
All NLRB employees were required to review a brief Hatch Act training in 2024.
All OGE staff are required to receive annual ethics training.
Provided extra and targeted training to groups in particular areas that could lead to conflicts of interest or other ethics issues. Provided ethics training to interns.
ONDCP mandated that all personnel, including detailees, IPA's, and contractors, complete the annual ethics training.
Yes. The agency updated the initial ethics training, and the annual ethics training, and reviewed the Human Trafficking Awareness training to make sure that the information provided were current and relevant. After the updates, the agency provided these trainings to all staff.
New supervisors receive additional ethics training.
The DAEO required all employees to complete mandatory Hatch Act training.
USTR provides initial and annual ethics training for all agency employees, detailees, consultants, and contractors.
Overseas staff attending Overseas Staff Training (OST) are required to receive training focused on ethics issues they may encounter in an overseas environment. These OSTs are held bi-annually. Also, personal services contractors (PSC) staff at overseas Peace Corps post were required in 2024, as they have been for several years now, to review ethics materials upon entering on duty.
DAEO requires that all Commission employees - even non-filers - receive annual ethics training (performed live via Microsoft Teams in 2024).
The SEC required mandatory ethics training in 2024 for all SEC employees onboard as of December 31, 2023. (Employees onboarded on January 1, 2024 or after received mandatory initial ethics training.) Additionally, we required ethics training for all SEC employees on our supplemental ethics regulations due to regulation revisions that became effective in 2024.
All SSS employees required to receive annual training (278 and 450 filers) also received mandatory anti-human trafficking training.
The Ethics Law Division provided training to all 58,168 agency employees on how to identify, report and prevent suspected human trafficking pursuant to the Trafficking Victims Prevention and Protection Reauthorization Act of 2022, Public Law 117-348 Sec. 122. Additionally, the Ethics Law Division worked with SSA's Department of Human Resources to ensure that all new employees receive training on how to identify, report and prevent human trafficking within 90 days of onboarding. Employees must certify that they have completed training.
SIGAR requires all employees to attend live annual ethics training.
All agency employees are required to complete one hour of live ethics training each year.
My agency provided initial ethics training to unpaid interns as well as provided annual ethics training to all agency employees regardless of pay-grade, position, or job responsibilities.
In ethics trainings, we also covered outside activities, community service activities, endorsements, special access issues, anti-nepotism, and the Hatch Act.
Initial ethics training and annual ethics training for detailees

**Table 31: Q.21 Did your agency establish additional requirements for the agency's ethics education program, pursuant to 5 C.F.R. § 2638.309?:**

<p>We provided OGE's 2024 Hatch Act guidance to all staff. We also required travel training for all staff.</p>
<p>The Bureau Director requires all Bureau employees who work at the Bureau to attend annual ethics training without regard to their status as an OGE Form 278e or 450 filer.</p>
<p>DLA ethics officials need to complete 1 hour of ethics training, beyond annual ethics training per year. New ethics officials need to perform 6 hours of training. PEP is encouraged. For all annual filers, they must attend live, leader-led training.</p>
<p>The Army continued its DAEO-mandated Ethics Official continuing education program, requiring a minimum of one hour of additional ethics training for all ethics officials. Generally this year, that continuing education focused on recent changes to the Joint Ethics Regulations and 5 CFR Parts 2635 and 2601. Also, inspectors general, financial, and acquisition professional preformed annual ethics training.</p>
<p>DoD established initial and annual training requirements for all DoD ethics officials to ensure ongoing professional development. Some component agencies/commands require all personnel to receive training. Various agencies/commands also provide specialized training to senior leader staff and supervisors. DoD has an established policy preference for live, leader led training to the maximum extent practicable and requires that PAS officials receive live initial ethics briefing within 7 days of appointment. DoD established a requirement for DoD DAEOs and component agencies/commands to establish procedures for certifying compliance with the training requirements for DoD ethics officials on an annual basis.</p>
<p>The DAEO established ethics counselor training requirements for all ethics officials at the Department of Energy. Each ethics official must complete four hours of ethics training each calendar year, whether it is through the Institute for Ethics in Government or another source that offers training relevant to providing ethics advice and counseling. Political initial ethics training. Non-PAS political appointees receive live initial ethics training.</p>
<p>New Deputy Ethics Counselors (DECs) and Ethics Coordinators (ECs) are required to complete an orientation training with Ethics Division attorneys. The Ethics Division holds three quarterly trainings and an annual workshop for ethics officials, which DECs and ECs are required to attend. One component requires new ethics officials to complete OGE's web-based ethics training plan. Most components require all employees to complete annual ethics training. At the time the data was compiled, 36,063 non-covered employees completed AET. Some components require new employees to attend an ethics orientation, in addition to completing HHS's IET. One component requires employees who are preparing for deployment or assignment outside the agency to complete an ethics refresher training. The Ethics Division provides many optional trainings throughout the year including a training series for new ethics officials, financial disclosure reviewer trainings, a new supervisor training, topical trainings open to all HHS employees, and, on request, topical trainings to individual components.</p>

<p>Additionally, ethics officials in many components offer mandatory or voluntary trainings to their employees. Many components include ethics information in regular emails to employees or in component newsletters.</p>
<p>Attorneys at DOJ must complete annual Professionalism Training which includes one hour of ethics training. Purchase card holders and procurement officials receive annual ethics training. Administrative Officers/Executive Officers received focused ethics training in '24 regardless of their financial disclosure status. Many components require annual ethics training for all employees and interns regardless of their financial disclosure status. Most components provide ethics training to departing employees focused on post-government employment restrictions. Departing political appointees received both group and individualized ethics briefings.</p>
<p>CRM: employees with overseas duty stations receive additional ethics training focused on international issues and off-duty conduct.</p>
<p>DEA: core employees, supervisors, Task Force Officers, and other groups of employees receive annual ethics training and IET with ethics case studies and must pass a test on the Standards of Conduct.</p>
<p>OJP: ethics training provided to IPAs</p>
<p>OLA: social media and Hatch Act training provided to all employees</p>
<p>Agency Policy letter requires all EXIM employees to attend initial and annual ethics training.</p>
<p>NEH provides annual ethics training to all agency employees, including those not otherwise required by regulation to receive training.</p>
<p>Yes. The agency updated the initial ethics training, and the annual ethics training, and reviewed the Human Trafficking Awareness training to make sure that the information provided were current and relevant. After the updates, the agency provided these trainings to all staff.</p>
<p>Annual ethics training was offered to all OSC employees and OSC summer interns.</p>
<p>All PCLOB employees undertake annual ethics training, regardless of duties.</p>
<p>The Members appointed by the Biden Administration after the transition were not provided with onboarding materials by the White House. The DAEO took the training materials originally created for the transition with links to YouTube videos and provided interactive training materials to all Members as part of the onboarding and annual ethics training.</p>

**Table 32: Q.22 If your agency assessed risk to help inform the content, format, and/or timing of ethics education and communications, select all that apply (see PA-19-05 for reference):**

<p>The DAEO, who is also a senior management official, closely monitors all agency activities for issues and risks that might arise in a broad array of situations: contracting, hiring, outside activities by employees, FACA compliance, daily operations, etc. The DAEO, on a periodic basis, also reviews any informal or written advice to identify themes or common issues and when necessary, drafts general guidance on such issues.</p>
<p>A new DAEO started in July 2024. The DAEO and ADAEO did discuss the ethics program and improvements that could be made.</p>
<p>Ethics Attorneys coordinate with DCAA Audit Policy Personnel to evaluate how Ethics may be enhanced by the application of GAGAS Independence standards applicable to all DCAA auditors in the GS-0511 series.</p>

Included a one-hour Ethics Interactive Discussion in the Executive Business Council (EBC) The EBC meets quarterly is an annual event attended by all DFAS senior leaders and directors to review Agency direction and strategic priorities.
One MAJCOM used Public Affairs platform to increase awareness of key seasonal topics like gifts, fundraising, and political activities. Discussed common issues with Commander and CPO and sent reminders of ethics requirements during relevant times.
The Army continued to assess the content of ethics training instruction during ethics staff assistance visits, instruct on ethics topics at the incoming quarterly SES trainings and assesses the content of this training at the session, conduct quarterly Army ethics telecons with topics based on surveys of Army ethics counselors, and fulfill the DAEO-mandated annual continued education program.
The DAEO meets weekly with agency head where any ethics issues are addressed. DAEO also holds a bi-weekly Ethics team meeting to address programmatic and policy issues, including ethics education and guidance.
One component conducts a quarterly risk assessment. Another component works with ethics officials in area offices to identify topics for additional training. A third component conducted listening sessions with employees to identify potential areas of concern.
The Ethics Specialty Team's (EST) Financial Disclosure team attended regular senior leader calendar meetings to review, identify and mitigate areas of risk. EST also created our Ethics Advisor Program composed of Integrity & Compliance Officers throughout VHA. This program involves over five hours of initial ethics training and multiple follow-up sessions on particular topics yearly. Individuals who complete the program are set up with a liaison in EST. Integrity & Compliance Officers provide the ability to identify and coordinate on ethics issues throughout the field given their established positions at VA Medical Centers. VA requires all employees to receive annual ethics training. It is assigned and provided electronically. In a focused effort to bring awareness to ethics, we developed an extensive training session and designation for Deputy Designated Agency Ethics Official (DDAEOs) across VA's major pillars, including VHA, VBA, NCA and OIT. These senior leaders receive several ho
Our Ethics staff meet regularly to discuss significant developments, trends and issues that should be added to our annual ethics training, in addition to sending periodic ethics announcements.
DAEO independently assessed areas of risk associated with the work of agency employees based on personal knowledge and ensured that training addressed those areas, as applicable. Training for SGEs was targeted differently than training for career employees.
We provide ethics training directed specifically to Acquisition staff and the CIO's office, who work the most on high-dollar IT acquisitions. This training includes relatively more training on acquisition-specific topics like the Procurement Integrity Act than regular annual training. We also provide targeted trainings for other units.
Before conducting the training, solicited input from supervisors and employees regarding potential topics of interest to ensure that training topics were relevant and addressed any ethics concerns.
Discussed with Chiefs of Staff what issues they commonly face in their respective offices.

Conducted self-assessments to ensure that required employees are receiving the training administered post-training evaluations to assess participant’s perceptions of the training reviewed advice logs for increased activity after training presentations.
The DAEO has incorporated additional info into Member ethics materials related to the Hatch Act and Social Media Guidance.

**Table 33: Q.23 If your agency evaluated the effectiveness of your ethics education and/or communication, select all that apply (see PA-19-05 for reference):**

Staff were provided a quiz and DAEO/ADAEO are evaluating the answers to see where additional training may be needed.
Received written feedback from DCAA Managers and Supervisors about the effectiveness of all Ethics Training
One MAJCOM used SAF/GC ethics training and found the SAF/GC training to be effective.
One program reports an increase in questions from employees after presenting on specific topics. Another component receives ongoing feedback from senior leaders and program offices.
After DO sends out global email with ethics newsletters, electronic guidance on Hatch Act, and on holiday gifts, there an influx of questions, showing that people read this guidance and it is effective. TTB continues to informally canvas training participants on their perceptions of the training.
EST sends an annual client satisfaction survey to stakeholders across the agency to garner feedback in many areas, including education. EST sends post-virtual training surveys to participants to monitor and adjust the delivery of ethics advice on a continual basis throughout the year. Finally, EST has improved our training frequency to include monthly offerings to the agency on financial disclosure, as well as increased frequency for Hatch Act and Post-government Employment (PGE).
Although we do not currently have a formalized evaluation process, we do gather responses anecdotally from our learners and our clients. The 2024 annual ethics training on Financial Conflicts of Interest was again extremely well received and addressed a top area of concern expressed by DEOs. As part of our collection of information for the annual questionnaire, we offer DEOs an opportunity to comment freely. This year's comments were uniformly complimentary of the responsiveness, knowledge and customer service provided by the EPA Ethics Office.
We consider whether a particular pattern of ethics issues have emerged among employees that was addressed or should have been addressed by annual ethics training.
Received informal feedback on annual ethics briefs during departure debriefs, particularly on ethics topics during administration transitions, e.g., post-government employment restrictions.
All employees completed a computer-based ethics training during 2024.
Updated online initial ethics orientation.
Ethics staff reviewed all post-training comments
We were assessed via an OGE program evaluation and received 5 recommendations. Also, we are still evaluating and gathering feedback on the FDOnline tool which was rolled out in 2022.

**Table 34: ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds.**

<p>Due to the large (for an agency as small as ours) influx of new employees in 2024, I conducted an agency-wide, live ethics training a year ahead of time. Regarding questions 14 and 18: The DAEO is also the person that initiates all personnel hiring actions, so he is always aware of all new hires. Regardless, the human resources contractor for the agency (BSEE within Interior) has included the required language in all offer letters.</p>
<p>General comment for Part 5: In addition to the required training, we also offer briefings to all new public financial disclosure filers that cover the 278 and 278-T filing requirements and how to use Integrity.gov. In connection with the annual filing seasons for confidential financial disclosures and public financial disclosures, we offer several training sessions on how to complete the relevant financial disclosure report. These financial disclosure training sessions are also optional.</p>
<p>Question #22: CFTC Ethics has discussed with agency leadership, the CFTC's role in regulatory and enforcement related to cryptocurrency exchanges and provided guidance to agency staff, regarding investment in cryptocurrency.</p>
<p>Question 20 - there were over 400 confidential filers, but many of them left the agency prior to the annual ethics training, leaving 382 filers required to receive annual ethics training.</p>
<p>#17: Detailees are not included in this response unless they meet the definition of "employee" pursuant to 5 CFR 2638.603. One employee were trained beyond the 3-month requirement due to an administrative oversight however, that employee received IET in 2024. #20: Consistent with the OGE Legal Advisory published July 11, 2023, regarding Guidance on Detailees Between Agencies and Need for Agency Coordination [LA-23-10]. This guidance states on page five As detailees are employees of the home agency, the home agency is responsible for ensuring that a detailee receives required ethics training. However, a home agency may meet this obligation by confirming that the detailee has received appropriate training at the receiving agency.</p>
<p>Q23. Upon evaluation of our training program, we decided to conduct a series of supplemental trainings on targeted ethics issue of interest to the workforce. These sessions covered the OGE Form 450, Conflicts of Interest/Impartiality, and Ethics in Hiring (focused on Sec. 1117 of the FY22 NDAA). We also provided ethics training for targeted audiences, including the Acquisition Workforce, the Procurement Services Directorate, and Deputies of the major organizational components. Finally, we published monthly ethics articles on the internal agency website to further educate the workforce and keep ethics topics front of mind. The articles and targeted trainings led to an increase in questions received by the Ethics Program and facilitated discourse on ethics issues across the Agency.</p>
<p>Question 22: We provided tailored ethics trainings to multiple DIA offices, such as, the Directorate for Mission Support, the Joint Military Training Center, the Defense Attach Service, the Chief Information Office, the Equal Employment Opportunity Office and the Office of Counterintelligence throughout the year.</p>

Q20. (continued) 3-One MAJCOM had 25 confidential filers out of a total of 539 who did not receive AET. Most of these filers were assigned to a base that used FDM to track AET. FDM includes all confidential filers listed with the organization at any point in time during the year as requiring training, even if they leave before the annual training is due and without completing the training. The office does not typically push annual training until October-November due to the majority of personnel changes occurring over the summer months. Filers who have left the installation are included in the overall numbers for those who require training by that organization. Other filers missed training due to deployments or family leave which had the member off-station and not performing covered duties for an extended period of time that included the reporting period. 4-One ethics office in a MAJCOM is responsible for providing annual training for a large number of tenant unit OGE Form 450 filers on the base. The office sent instructions and multiple reminders to all base filers regarding AET. Another base reported that it sent multiple reminders to the confidential filers who had not yet completed AET. The legal office then notified supervisors. Of the 11 confidential filers who have not received training, one is on maternity leave, two are no longer employed by the AF, and the others/their supervisors have not responded to the legal office's requests. 5-Confidential filers left the agency prior to the time that AET was scheduled. The duties of other confidential filers changed after filing and they were no longer required to receive AET. 6-One MAJCOM had 2 confidential filers out of a total of 624 filers who did not receive AET in CY 2024. The ethics office for the wing was working to provide training in the first week of CY 2025. 7-One ethics office reported that one filer was gone on temporary duty for an extended period of time ethics office was not able to provide training to this individual. 8-Six confidential filers (out of total of 55) in one command did not respond to repeated requests to complete training. 9-One ethics office stated that 10 of its 111 filers did not receive AET because they were transferred to another installation or they did not respond to repeated communications about the training. 10-One major command noted that the discrepancy between the number of confidential filers required to be trained and the number of confidential filers actually trained was due to delayed identification of filers and inconsistent annual training records. The command will increase coordination with the Civilian Personnel Office to mitigate a recurrence. 11-One major command noted one confidential filer out of its 363 filers did not get AET on time after several contacts by the ethics official. The individual's commander has been notified of the situation and will ensure the person receives training. Q17. One major command explained that two of the individuals who did not receive IET within three months rescheduled multiple times. The base CPO is working to train the individuals or hold them accountable pending a review of their position description statements. Four of the individuals worked remotely and missed in-person initial ethics briefings. These individuals were discovered during an internal audit of training sign-in sheets and immediately trained remotely after the 3-month requirement. Three new hires were identified too late to complete training within CY 2024. Q20. One major command explained that some employees resigned their positions or moved prior to completing training and were not updated in FDM as leaving the organization. In most cases, subordinate bases keep paper or excel sign-in sheets to record actual trainings, but the bases have been inconsistent in updating those individuals in FDM. In two specific instances, one filer continues to have ongoing login issues while the other has been undergoing long-term hospitalization. Another employee began maternity leave prior to

receiving her training and has received an exception. The major command is requiring its base legal offices to record the ethics training in FDM. Additionally, the major command will implement periodic progress reports of FDM for subordinate units. The current list of filers is being reviewed, and filers no longer a part of the organization will be removed. Q20. The employees that the Department listed in section d last year are not included in the numbers reported in section c this year. Last year the ethics official for the major command misunderstood the question and reported 76 employees who were required by the head of certain command directorates, not the head of the agency, to receive annual ethics training. These individuals are neither public nor confidential financial disclosure filers.

The Department of the Navy DAEO has delegated certain duties to certified ethics counselors. In order to be certified as an ethics counselor, the Department of the Navy attorney must have completed a minimum of eight hours of training in the core ethics/standards of conduct subject areas (e.g., conflicts of interest, financial disclosure, post-Government employment, gifts, use of Government resources, misuse of position, and relations with non-Federal entities). Additionally, certified ethics counselors are required to complete annual recertification training.

IET was performed live for new employees during their Entry on Duty (EOD) Orientation. Live annual ethics training was conducted for senior leaders (SES and GS-15 supervisors) during the 4th quarter Senior Leader Meeting. Several Components requested and received live annual ethics training during their Town Hall meetings. Several Components requested and received Hatch Act training during their Town Hall Meetings. We also provided Hatch Act training during a Defense Council on Integrity and Efficiency quarterly meeting.

Q20: In 2024 DOJ/DEO finalized and launched new interactive annual ethics training for financial disclosure filers online via its Learning Management System (LMS) for the first time. The training fulfilled 2024 annual ethics training requirements for public and confidential financial disclosure filers. More than 7,000 DOJ employees completed the online ethics training in 2024.

Additional comments for Question #19: In CY 2024, IET was provided under the DAEO's supervision for all DOI Bureaus and Offices with the exception of the Office of Inspector General (OIG) and National Indian Gaming Commission (NIGC). OIG and NIGC ethics officials are not under the DAEO's direct supervision. However, both OIG and NIGC have less than 1,000 employees each and also provided the DAEO with a written assessment containing information on the procedures which have been implemented for the provision of IET.

Additional ethics training offered included intern ethics training, Hatch Act training, senior leadership training, impartiality training, and ethics for administrative officers. NASA also collaborated with USDA to create a new joint online interactive ethics training platform leveraging technology to enhance learning.

16(a): No new agency leaders, as defined in 5 C.F.R. 2638.305(a), joined NEH in 2024. NEH has one PAS, non-SGE agency leader the Chair who receives annual in-person ethics training.

#16, #17 and #20 – Data not included/is classified. All new employees received training and Standards of Conduct training is required mandatory annual training for all employees per agency policy.

In addition to the required training described above, the NLRB Ethics Office provided additional training, ethics briefings, and guidance materials for agency employees. Ethics officials provided unpaid interns with initial ethics training (IET) as part of their orientation to the NLRB and, as a result, 90 unpaid interns completed IET in 2024. The Ethics Office also provided live briefings to new employees at the New Employee Orientation hosted by the Office of Human Resources (this is in addition to the required IET). In addition, the DAEO delivered a Hatch Act briefing to an NLRB headquarters division in 2024. Finally, the NLRB has developed and circulated ethics guidance and resource materials on a range of topics throughout the year, including conflicts of interest, impartiality, outside work and activities, gifts, and issues related to legal ethics/professional responsibility.

Question 20: Received very positive feedback from OSC employees and interns on USDA DAEO's annual ethics training.

#20. In 2024, the Agency made ethics training mandatory for all cadre employees. Over 96% of all Agency employees completed their training before the December 31 deadline. Those that did not were not able to access their computer systems until the training was complete. The total number of employees in the Agency is classified.

Ethics officials publish "Ethics Dispatches" to highlight ethics issues that may be of interest to agency employees and are timed to occur during the year when certain ethics issues might arise (e.g., Hatch Act during election season, gift rules during the holiday season). New issues are circulated to the entire agency on a quarterly basis. Additionally, ethics issues in the news (Office of Special Counsel prosecutions, etc.) are periodically circulated to all employees to draw attention to the importance of following (and the consequences of ignoring) ethics rules.

Q.15 - The response to Q 15 is that All of the written offers included the required information.

With respect to question 23, all Video on Demand ethics trainings (VODs) are 508 compliant.

Q20.: This number includes non-appointees and individuals who left the agency after training before December 31, 2024. It also includes WHO public and confidential financial disclosure report filers.

**PART 6. ADVICE, COUNSELING, AND REMEDIES**

**Table 35: Q.24 From the list below, select the three topics that your employees most frequently sought guidance on in 2024. Please rate them in order, so that the first topic is the topic on which employees sought guidance the most frequently.**

Hatch Act Questions
Widely Attending Gatherings
Supplemental Regulations
The ethics office reviews invitations for certain personnel to attend and/or speak at events hosted by external entities to ensure compliance with the Standards of Conduct and DoD Joint Ethics Regulation.

**Table 36: Q26 Number of 18 U.S.C. § 208 waivers granted in 2024:**

One component sends waivers to OGE on a quarterly basis, thus the number of waivers sent in FY24 includes those from Q4 of FY23 and Q1-Q3 of 2024.
One waiver was sent to OGE but was ultimately not issued.
(JSC) One of waivers was withdrawn after sent to OGE because spouse separated from company causing the conflict. Other granted by Administrator on Jan 8, 2025.

**Table 37: Q.27 Number of Legal Expense Fund documents filed in 2024 (see 5 C.F.R. § 2635.1007):**

Term report is still under DDAEO review in the component and will be submitted to OGE within the timeline set forth in 5CFR 2635.1008(d)
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**Table 38: ADDITIONAL COMMENTS FOR PART 6. indicate the question number to which the comment corresponds.**

Q24. The topic of gift acceptance received the highest number of first place responses from the field ethics offices, but it also received the highest number of third place responses. I was not sure if I should rate gift acceptance as both 1 and 3. After removing gift acceptance from consideration for third place, the topic of financial disclosure reporting was in third place.
Q24: The frequency of ethics questions asked on these topics does not necessarily reflect the relative seriousness or complexity of ethics questions that employees ask.
Within the topic of "gift acceptance," employees most frequently sought advice on offers of free attendance at conferences and other events. In an effort to be more responsive to this need, the agency ethics office has developed worksheets for analyzing speaking invitations and the applicability of the "widely attended gathering" exception.

## PART 7. FINANCIAL DISCLOSURE PROGRAM MANAGEMENT AND ELECTRONIC FILING SYSTEMS

**Table 39: Q.28 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. § 2638.105(a)(1))?**

No new public filers were hired or promoted during the reporting year.
The DAEO is also the person that initiates all agency personnel actions (including hiring, terminations, retirements), in close coordination with the human resources contractor in Interior. He is always aware of all appointments well before they happen.
During my tenure as DAEO, I am unaware of any appointments to public financial disclosure filing positions.
We have only 4 public filers and it is evident to the DAEO when they are appointed (or terminated). Therefore notification by HR is not necessary.
No new appointments.
No public filers were appointed during the reporting period.
In 2024, USARC did not have any appointments of new public filers.
Due to the structure and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No new appointments
The CSB's Ethics team reviews all offer letters before issuance. The purpose three-fold. First, the Ethics team ensures all required ethics language is included in the offer letters. Second, the Ethics team confirms that offer letters for appointments to positions which require either public or confidential filings are noted for additional action with respect to applicable requirements (e.g., new entrant filing). Third, once we have the name(s) of new hires and see that they have started work, we schedule them for initial ethics training. [Remember that the CSB has less than 50 employees, so the Ethics team is well aware of all new hire activity, and we quickly become acquainted with all new hires as a result of introductory emails from their respective supervisors.]
The Commission did not have any appointments to public financial disclosure filing positions in calendar year 2024.
The Office of the General Counsel, not Human Resources, make the determination of public and confidential filing positions.
No new SES appointments in 2024
At the beginning of CY24, there was a vacancy in the personnel office's point of contact for appointments to public filing positions. As a result, two new HQE public filers were not timely identified to the Ethics Program. The vacancy has since been filled and the Ethics Program has established a monthly sync with the new SES Program Manager to facilitate timely notification of appointments.
Despite continued attempts to remind our agency's HR contact who specifically works with SES and military, we are generally not notified of individuals leaving or arriving. We keep in close contact with those Public Filers, so that we may assign reports in a timely manner.

There were no public filers appointed in 2024.

Several ethics offices stated that their civilian personnel office notified them of the appointments in all or most cases. Several other ethics offices stated that their CPO never notified them or that this question was not applicable to them. Selecting in some cases” was the best compromise answer. The following are explanations from different Air Force ethics offices. 1) One major command stated that although the personnel offices notify ethics officials of appointments, ethics officials are also notified of appointments of public filers by SAF/GCA and of confidential filers by supervisors. 2) One major command has a small number of filing positions, and the individuals are prominent. The ethics office tracks the appointments. 3) On several installations in one major command, supervisors, unit POCs for financial disclosure, and the employees themselves notify the ethics office of appointment to filing positions. Other bases within the same major command used other methods to notify filers: a) ethics office developed its own successful tracking system for identifying required filers, b) HR office granted ethics office access to an HR system so that ethics office can generate its own lists of appointments. Ethics offices in other bases in this major command are working with their personnel offices to receive notification of new confidential filers. One base has a larger number of tenant units who are transferred internally to positions requiring confidential filing. These individuals are not processed through the personnel office. 4) One major command coordinates directly with senior leadership to determine who files, and unit training managers notify the ethics offices. 5) One major command stated that CPOs at some of its installation had new personnel who were not aware of the requirement. These CPOs are now aware of the requirement, and the legal office has been added to the CPO distribution list and Teams channel, where they can learn of appointments.

FCSIC did not gain any Public Financial Disclosure Filers in calendar year 2024.;FCSIC is a very small and stable workforce and notification of an employee promotion was missed. In calendar year 2024, one of its employees received a promotion that converted the employee from a non-filer position to a Confidential Financial Disclosure Filer. The FCA, Office of Agency Services (OAS), who provides human resources services to FCSIC, did not generate a personnel action report for this promotion, and consequently, the ethics office was not notified of the promotion. During the timeframe to complete 2024 Annual Ethics Training, a FCSIC official contacted the ethics office to inquire about the employee's ethics training. It was at this time that the ethics office learned about the promotion and then had the employee file a Confidential Financial Disclosure Report, OGE 450 and complete ethics training. In calendar year 2024, the ethics office began an informal process to check public and confidential filer lists with OAS on a quarterly basis, however, the FCSIC employee's promotion escaped notice during the quarterly check.

No appointments to public filing positions in 2024.

We did not have any of these appointments this year

There were no public filers hired in 2024.

the agency did not hire any personnel designated as public filer.

The DAEO/head of the agency is the only person needing to file a disclosure, no appointments were made in 2024.

JUSFC is a nano-sized agency of only four (4) FTEs and contracts with GSA for HR services. JUSFC directly initiates any hiring processes and the DAEO is aware of any new hire.
No appointments to such positions were made in 2024.
DAEO is aware of all hires/promotions that would impact financial disclosure reporting requirements/changes.
The onboarding process and NSC orientation training for new employees included information on financial disclosure requirements, but new appointments to financial disclosure positions on NSC staff were not always identified in 15 days.
There were no appointments during this time period
Timely notification continues to be a challenge for our program. The DAEO and ADAEO are working closely with new management in OCHCO to provide training and implement program changes to improve this metric. Further, Ethics Specialists are working with our contractors to update the Ethics Gateway system to better integrate with OCHCO's systems, which should provide more timely notification of employees moving into confidential financial disclosure positions and into and out of public financial disclosure positions.
The President announced his intention to nominate the Director of OGE, which was OGE's only new public filing position in CY2024.
No new appointments in 2024
During CY 2024, there were no appointments at IPEC to public financial disclosure filing positions. And, IPEC does not have a separate HR office.
no new hires in 2024
SCRC did not have any new appointments to public and confidential financial disclosure filing positions.
No positions meeting the C.F.R. § 2638.105(a)(1)) requirement were hired.
GSA CABS does not make any recommendation or notification of ethics related issues or need/requirement to file the 450 or 278. GSA CABS does not provide any training or intro to ethics as part of their onboarding. There were no new hires in 2024.
There were no appointments to filing positions in 2024.
The Ethics and Compliance team obtains a report from Human Resources database on a weekly basis. The Postal Service broadly announces the appointment of new officers.
Due to the Commission's size (32 FTEs) and the infrequent onboarding of new employees (102 employees annually) the DAEO issued written procedures in July 2023 that the ADAEO would separately reach out to newly-onboarded employees of possible confidential filer positions. In FY2024, the Commission did not onboard any public filers.
Due to personnel changes, communication between Human Resources and the Ethics program was erratic for a portion of the year. The Ethics Office rectified this issue before the end of the year and this will not be a problem moving forward.
No new confidential filers were hired or promoted during the reporting year.
The DAEO is also the person that initiates all agency personnel actions (including hiring, terminations, retirements), in close coordination with the human resources contractor in Interior. He is always aware of all appointments well before they happen.

We have only 5 confidential filers and it is evident to the DAEO when they are appointed. Therefore notification by HR is not necessary
No new appointments.
In 2024, USARC did not have any appointments of confidential disclosure filers.
Due to the structure and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No confidential filers
The Commission did not have any appointments to confidential financial disclosure filing positions in calendar year 2024.
The Office of the General Counsel, not Human Resources, make the determination of public and confidential filing positions.
There were no confidential filers appointed in 2024.
No confidential filer appointments.
No appointments to confidential filing positions in 2024.
We do not have confidential filers
We do not have any confidential filers.
JUSFC is a nano-sized agency of only four (4) FTEs and contracts with GSA for HR services. JUSFC directly initiates any hiring processes and the DAEO is aware of any new hire.
In an office with so few employees and, at most, a handful of new appointments each year, and where the ADAEO is also the official responsible for hiring decisions, the DAEO is aware of all such appointments without the need for formal notification from the HR office (the Commission's Administrative Officer).
DAEO is aware of all hires/promotions that would impact financial disclosure reporting requirements/changes.
No one appointed to a confidential financial disclosure filing position in 2024.
No new appointments in 2024
During CY 2024, there were no appointments at IPEC to confidential financial disclosure filing positions. And, IPEC does not have a separate HR office.
No new confidential filers hired in 2024.
SCRC does not have any federal employees that are required to file confidential reports.
No positions meeting the C.F.R. § 2638.105(a)(1)) requirement were hired.
GSA CABS does not make any recommendation or notification of ethics related issues or need/requirement to file the 450 or 278. GSA CABS does not provide any training or intro to ethics as part of their onboarding. There were no new hires in 2024.
There were no terminations from filing positions in 2024.
The Ethics and Compliance team obtains a report from Human Resources database on a weekly basis. The Postal Service broadly announces the appointment of new executives.
Due to the Commission's size (32 FTEs) and the infrequent onboarding of new employees (102 employees annually) the DAEO issued written procedures in July 2023 that the ADAEO would separately reach out to newly-onboarded employees of possible confidential filer positions. In FY2024, the Commission did not onboard any public filers.

**Table 40: Q.28 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. § 2638.105(a)(1))?**

<p>FCSIC is a very small and stable workforce and notification of one employee's promotion was missed. This was the only staffing change in 2024. Specifically, in calendar year 2024, one of its employees received a promotion that converted the employee from a non-filer position to a Confidential Financial Disclosure Filer, OGE 450. The FCA, Office of Agency Services (OAS), who provides human resources services to FCSIC, did not generate a personnel action report for this promotion, and consequently, the ethics office was not notified of the promotion. During the timeframe to complete 2024 Annual Ethics Training, a FCSIC official contacted the ethics office to inquire about the employee's ethics training. It was at this time that the ethics office learned about the promotion and then had the employee file an OGE 450 and complete ethics training. Also in calendar year 2024, the ethics office began an informal process to check public and confidential filer lists with OAS on a quarterly basis, however, the FCSIC employee's promotion escaped notice during the quarterly check.</p>
<p>HD does not notify OGC Ethics of confidential filer appointments, the first line supervisor notifies our team.</p>
<p>We have no confidential filers</p>

**Table 41: Q.29 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. § 2638.105(a)(2))?**

<p>There were no public filer terminations during the reporting year.</p>
<p>The DAEO is also the person that initiates all agency personnel actions (including hiring, terminations, retirements), in close coordination with the human resources contractor in Interior. He is always aware of all appointments well before they happen.</p>
<p>During my tenure as DAEO, I am unaware of any appointments to public and confidential financial disclosure filing positions.</p>
<p>See comment to # 28.a, above.</p>
<p>No terminations.</p>
<p>Due to the small size of the agency, the ADAEO also handles some HR duties and is aware of new hires/departures.</p>
<p>There were no terminations of public filers during the reporting period. Also, the Access Board is a micro-agency with fewer than 30 full-time employees so, agency ethics officials would be aware of a public filer's termination without notification from human resources.</p>
<p>In 2024, USARC did not have any terminations of public filers.</p>
<p>Due to the structure and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.</p>
<p>No terminations.</p>

There were no terminations of employees or officials from public financial disclosure filing positions.
The Commission did not have any public financial disclosure filers terminate from the agency during the 2024 calendar year.
Despite continued attempts to remind our agency's HR contact who specifically works with SES and military, we are generally not notified of individuals leaving or arriving. We keep in close contact with those Public Filers, so that we may assign reports in a timely manner.
There were no terminations of public filers in 2024.
Several ethics offices stated that their civilian personnel office notified them of the terminations in all or most cases. Several other ethics offices stated that their CPO never notified them or that this question was not applicable to their office. Selecting in some cases" was the best compromise answer. The following are explanations from different Air Force ethics offices. 1) One major command stated that its public filers have a direct working relationship with their servicing ethics counselors and the filers provide the ethics counselors with timely notice of their intent to separate from Federal service. 2) One major command stated that their HR office forwards rosters of gains and losses monthly. 3) One major command has a small number of filing positions, and the individuals are prominent. The ethics office tracks the retirements. 4) One ethics office in a major command worked with trained POCs on the base to develop its own tracking system for identifying retiring filers. 5) Some organizations stated that their CPOs had no mechanism to track appointments or terminations. Instead, the ethics office works with supervisors to track filers. 6) Notifications of retirements to the ethics office were delayed due to turnover in the CPO office.
Communication delays and difficulties with obtaining current HR related information. These are being addressed through enhancements to information-sharing tools between HR and DEO.
In 2024, none of FCSIC's Public Financial Disclosure Filers terminated employment.
No public financial disclosure filers left the agency in 2024.
No terminations from public filing positions in 2024.
We did not have any terminations
There were no terminations of public filers in 2024.
There were no agency employees designated as public financial disclosure filer that left the agency.
There were no instances of public filers departing the organization or changing duties that would terminate the requirement for filing.
JUSFC is a nano-sized agency of only four (4) FTEs and contracts with GSA for HR services. The DAEO is directly aware of every termination or separation from service.
There were no terminations from such positions in 2024.
DAEO is aware of all changes to employment that would impact financial disclosure reporting requirements/changes.
No terminations during this time period
Timely notification continues to be a challenge for our program. The DAEO and ADAEO are working closely with new management in OCHCO to provide training and implement program changes to improve this metric. Further, Ethics Specialists are working with our contractors to

update the Ethics Gateway system to better integrate with OCHCO's systems, which should provide more timely notification of employees moving into confidential financial disclosure positions and into and out of public financial disclosure positions.
No public filers departed.
OGE did not have any terminations from public financial disclosure positions in CY2024.
No terminations in 2024
During CY 2024, there were no terminations from a public financial disclosure filing position. And, IPEC does not have a separate HR office.
no terminations in 2024
There were no terminations in 2024.
SCRC did not have any terminations from public financial disclosure filing positions.
No positions meeting the C.F.R. § 2638.105(a)(2)) requirement were terminated.
GSA CABS does not know anything about who at our Agency is a non-filer, 450 filer, or a 278 filer. The DAEO would track this independently of the HRM office (GSA CABS).
There were no terminations from filing positions in 2024.
The Ethics and Compliance team obtains a report from Human Resources database on a weekly basis. The Postal Service broadly announces the appointment of new officers.
No public filers departed the Commission in FY 2024.

**Table 42: Q.29 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. § 2638.105(a)(2))?**

*None*

**Table 43: Q.32 Which electronic filing system(s) does your agency use?**

US Army FDM financial disclosure system
Financial Disclosure Management (FDM)
Electronic 450 (E450) system developed by internal IT staff
CIA's e-filing system.
FDOnline (Intelliworx)
FDonline, Intelliworx Financial Disclosure system.
Ethics Management and Tracking (EMAT) System.
FDOnline
FDonline
FD online
Secure Microsoft SharePoint site
CEQ uses a custom intranet web portal for employees to file annual confidential financial disclosure reports.
Army Financial Disclosure Management System.
Financial Disclosure Management (FDM) managed by Department of the Army.
The U.S. Army's Financial Disclosure Management (FDM) system.

DoD Financial Disclosure Management (FDM) for Confidential Financial Disclosure Reports only.
Financial Disclosure Management (FDM) system, <a href="https://www.fdm.army.mil/">https://www.fdm.army.mil/</a> .
Financial Disclosure Management (FDM) hosted by the U.S. Army ( <a href="https://www.fdm.army.mil/">https://www.fdm.army.mil/</a> ).
DLA uses Integrity for OGE 278 filings, but uses Financial Disclosure Management (FDM) for OGE 450 filings.
DTRA uses the Financial Disclosure Management System (FDM) for all OGE 450 confidential financial disclosure reports.
FDonline
Intelliworx FDonline
Army's Financial Disclosure Management System (FDM)
Financial Disclosure Management System
Financial Disclosure Management System (FDM)
Financial Disclosure Management (FDM) electronic filing system.
FDM
FDonline
FDonline
1. HHS Electronic Financial Disclosure System (EFDS) 2. NIH: NIH Enterprise Ethics System (NEES) 3. CDC: Ethics Program Activity Tracking System (EPATS) and 4. CMS: CMS Administrative Technology Solutions (CATS)
U.S. Army Financial Disclosure Management system (FDM) FDonline Human Resources Business Engine (HRBE) in-house developed program
FDonline
Sharepoint (ATF), Internal OGE Form 450 system (USMS), FDonline (JMD/DEO, ATJ, BOP)
Financial Disclosure Management System (FDM)
FDonline for confidential financial disclosure reports (OGE Form 450)
FDonline
DO, BEP, OCC, and US Mint use internally developed electronic systems for OGE 450 filing and management. TIGTA uses a commercial product for OGE 450 filing and management.
The Army Financial Disclosure Management system in 2024, transitioning to FDO Online in CY 2025.
For the confidential financial disclosure reports, EPA Ethics designed its own e450 system built in EPA's business application platform (BAP) with Salesforce.
FDonline (Intelliworx)
Confidential Financial Disclosure Reports, OGE 450, and Confidential Conflict of Interest Certification Forms, FCA Form 449, are electronically processed in a secure SharePoint system. SharePoint houses the form and is used to collect the information, record e-signatures, and electronically route the form from the filer the to the ethics office. The ethics office collects the OGE 450 annually. We collect FCA Form 449s from applicable filers every three years, with 2023 being a collection year.
Confidential Financial Disclosure Reports, OGE 450, and Confidential Conflict of Interest Certification Forms, FCA Form 449, are electronically processed in a secure SharePoint system.

SharePoint houses the form and is used to collect the information, record e-signatures, and electronically route the form from the filer to the ethics office. The ethics office collects the OGE 450 annually. We collect FCA Form 449s from applicable filers every three years, with 2023 being a collection year.
FDOnline
FDonline
FDonline Intelliworx Electronic Filing System
FD Online
See Para. 33.
Power App
FDonline
The FTC uses FDonline to e-file most Confidential Financial (OGE-Form 450) Reports. Occasionally, OGE's PDF version of the OGE Form 450 report is used instead.
e-OGE Form 450 filing system.
FD Online
OGE-450s are completed using the fillable PDF form
We use Integrity for all OGE-278e & OGE-278T reports. We use FD Online for OGE-450 reports.
Ethics Program Tracking System (EPTS)
FDonline (current), FDM (historical)
FDOnline
FDM
FDOnline for confidential financial disclosure reports (OGE Form 450).
NSF eFile system.
In addition to Integrity, NSA uses its internal Financial Disclosure Reporting System (FDRS).
FDOnline
Ethics Gateway (Appian)
450 Portal based on the OMB Portal.
Army's FDM
OMB Ethics Portal contains a Confidential Financial Disclosure (OGE Form 450) application.
Ethics Compliance Tracking System
Financial Disclosure Management (FDM)
FDonline (HRWorx)
Confidential Financial Disclosure System (CFDS)
FDonline
FDOnline
ARMY's FDM system for 450 reports.
FDonline/Intelliworx
Financial Disclosure Management System (FDM) <a href="http://www.fdm.army.mil">www.fdm.army.mil</a>
We use Integrity for the 278 and FD Online for the 450 filers.
FDonline
Financial Disclosure System (FDS)
Confidential Financial Disclosure forms are submitted via Sharepoint.

FDOonline/Intelliworx
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**Table 44: Q.33 Indicate for which forms your agency uses the “Other” e-filing system. Check all that apply.**

CIA's e-filing system.
Integrity and FDOonline (Intelliworx)
FDOonline/Intelliworks financial disclosure filing system provided by government contractor, HRworx.
FDOonline
FDOonline
Ethics Program Tracking System (EPTS)
FDOonline
eFile. NSF moved all 278 filers to Integrity effective 1/1/2025.
Financial Disclosure Reporting System (FDRS)
FDOonline
FDOonline for all three forms.
FDOonline/Intelliworx
FDOonline/Intelliworx

**Table 45: Q.33 Indicate for which forms your agency uses the “Other” e-filing system. Check all that apply.**

CIA's e-filing system.
Integrity and FDOonline (Intelliworx)
FDOonline/Intelliworks financial disclosure filing system provided by government contractor, HRworx.
FDOonline
FDOonline
Ethics Program Tracking System (EPTS)
FDOonline
eFile. NSF moved all 278 filers to Integrity effective 1/1/2025.
Financial Disclosure Reporting System (FDRS)
FDOonline
FDOonline for all three forms.
FDOonline/Intelliworx
FDOonline/Intelliworx

**Table 46: Q.33 Indicate for which forms your agency uses the “Other” e-filing system. Check all that apply.**

Financial Disclosure Management (FDM)
E450
CIA's e-filing system.

Integrity and FDOonline (Intelliworx)
FDOonline/Intelliworks financial disclosure filing system provided by government contractor, HRworx.
Ethics Management and Tracking (EMAT) System.
FDOonline
FDOonline
FD Online
Microsoft SharePoint
It is not a commercial product. We refer to it as the ethics portal.
Army Financial Disclosure Management System.
The U.S. Army's FDM system.
Financial Disclosure Management (FDM) system, <a href="https://www.fdm.army.mil/">https://www.fdm.army.mil/</a> .
Financial Disclosure Management (FDM) hosted by the U.S. Army ( <a href="https://www.fdm.army.mil/">https://www.fdm.army.mil/</a> ).
Financial Disclosure Management (FDM)
Financial Disclosure Management System (FDM)
FDOonline
Intelliworx FDOonline
Army's Financial Disclosure Management System (FDM)
Financial Disclosure Management System
Financial Disclosure Management System (FDM)
Financial Disclosure Management (FDM) electronic filing system.
FDOonline
FDOonline
U.S. Army Financial Disclosure Management system (FDM) FDOonline Human Resources Business Engine (HRBE) in-house developed program
FDOonline
Sharepoint (ATF), Internal OGE Form 450 system (USMS), FDOonline (JMD/DEO, ATJ, BOP)
Financial Disclosure Management System (FDM)
FDOonline
FDOonline
DO and US Mint use SharePoint applications. BEP uses a Salesforce application. OCC uses an Appian application. TIGTA uses FDOonline.
IRBNet for OGE Alternative 450 form (ALT450).
For the confidential financial disclosure reports, EPA Ethics designed its own e450 system built in EPA's business application platform (BAP) with Salesforce.
FDOonline (Intelliworx)
The FCA and FCSIC use an FCA SharePoint site to host the Confidential Financial Disclosure Report, OGE 450, and the Confidential Conflict of Interest Certification Form, FCA Form 449.
The FCA and FCSIC use an FCA SharePoint site to host the Confidential Financial Disclosure Report, OGE 450, and the Confidential Conflict of Interest Certification Form, FCA Form 449.
FDOonline
FDOonline

FDonline Intelliworx Electronic Filing System
450 Filers e-mail or mail Reports which are then stored securely on the Agency's internal computer system.
Power App
FDonline
OGE-450s are completed using the fillable PDF
FD Online
Ethics Program Tracking System (EPTS)
FDonline (current), FDM (historical)
FDonline
FDM
The NLRB uses FDonline for confidential financial disclosure reports (OGE Form 450).
eFile. NSF moved all 278 filers to Integrity effective 1/1/2025.
Financial Disclosure Reporting System (FDRS)
FDonline
Ethics Gateway
450 Portal
Army's FDM
Ethics Portal - DocuTrack
Ethics Compliance Tracking System
Financial Disclosure Management (FDM)
FDonline (HRWorx)
FDonline
FDonline for all three forms.
Financial Disclosure Management (FDM)
FDonline/Intelliworx
Financial Disclosure Management System (FDM) <a href="http://www.fdm.army.mil">www.fdm.army.mil</a>
FD Online
FDonline
Financial Disclosure System (FDS)
Sharepoint
FDonline/Intelliworx

**Table 47: ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. Table 47**

Our General Counsel is the DAEO and has delegated authority for the program administration to the ADAEO, who is the Chief of OGC's Ethics Law Division. All responses in this questionnaire directed to the DAEO have been answered by the ADAEO. Question 28a - The answer "in most cases" for public filers is because there is the rare occurrence where senior officers receive their appointment outside the typical promotion process. Our office has worked with HR to secure more timely notification of these officers' appointments. Question

<p>29 - For confidential filers, the ADAEO is notified by offices other than HR Question 34 - The additional funds spent in CY24 were due to significant system upgrades to CIA's e-filing system.</p>
<p>With respect to Question 35.a., the CSB notes that all 4 public filers filed, but they did so via Integrity.</p>
<p>The Commission has one filer who submits a PDF version of the 278e as he is unable to access the FDonline/Intelliworks platform to file electronically.</p>
<p>Question 34b: As the Department of Defense (DoD) Executive Agent for the FDM filing system, the Department of the Army fully funds FDM for all DoD agencies from Army appropriations.</p>
<p>All OGE 278 reports were filed electronically using Integrity. Three OGE 450 filers are Special Government Employees (SGE) and do not have a CAC to access FDM to file electronically. Those three are not included in the confidential filers number as they did not file electronically in CY 2024.</p>
<p>PDF OGE 450s were used for two small advisory committees with difficulty accessing our electronic filing system. All other filers submitted their reports using Integrity or FDonline.</p>
<p>Q28a. (Continued) 6) The legal offices of two organizations use the initial ethics training that they provide to incoming personnel to discuss the confidential filing requirement and direct attendees to confirm their filing status with their supervisors. Additional comments: Q28. One major command stated that in many cases the Human Resources Office does not notify unit ethics officials within the command of new filers or departing filers for both public and confidential filers. In some subordinate units, this notification does occur. However, in many cases, the supervisor of the filer notifies the ethics official of the filing status, or the ethics counselor reaches out to the Human Resources Office for updates on new or departing filers. Q29. In all cases of public disclosure 278 filers, the SAF/GC office has notified the MAJCOM Senior Ethics Counselor of filing status, for both new and termination reports within the timeline. Many of MAJCOM's subordinate units do not have 278 filers. Q30-31. The overwhelming majority of reports (public and confidential) were filed electronically. There were a few situations in which filers submitted paper reports. SGEs filed paper OGE Form 450s because they did not have a CAC card. The issue has been remedied for the FDM e-filing system because SGEs will now be able to login using LOGIN.GOV. SGEs will be able to file electronically in the next filing cycle. A public filer used the PDF version of the OGE Form 278-T because he was overseas and did not want to access a government system from a foreign country. Q34. Expenses for the Army's Financial Disclosure Management System are tracked and reported by the Army. Q35. The number of confidential filers who filed electronically is slightly up over last year. Due to a reorganization in the Department, numerous employees were moved to new divisions, and the new supervisors decided that the employees needed to file the OGE Form 450.</p>
<p>Q 28-29 Most agencies/commands reported that they receive notifications in all or most instances. For those few reporting "never" or "n/a" the ethics office is either using another system/office to track or engaging with HR to get a system in place. Q 31 DoD uses the 450 PDF for SGEs who do not have access to electronic filing systems. The OGE 278e &amp; 278-T Excel spreadsheets are used as worksheets for individuals awaiting onboarding or system access. A</p>

Part 7 upload spreadsheet capability would be extremely helpful to assist filers in uploading transactions that were not required to be reported in a 278-T.
Answer to Q35 includes SGE filers.
Q35: Most OGE Form 450 filer numbers are reported for the filing year, not fiscal year, based on how the confidential financial disclosure filing system is set up.
Additional comments for Question #30: In CY 2024, the DEO permitted a delinquent filer to submit their termination OGE Form 278e outside of the Integrity system on a pdf version of the OGE Form 278e as a reasonable accommodation. Additional comments for Question #34: Please note that while the DEO uses Integrity as its public financial disclosure filing system, the Department's CIO requires the DEO to cover certain annual costs for security reviews and other support provided in connection with the use of Integrity at DOI.
EPA Ethics is notified, typically before the start date, of appointments to political, administratively determined, ALJ, career SES and SL/ST positions. We also receive a biweekly report of all executive staffing personnel actions that took occurred in the preceding 14 days. The only notifications for public filers that may lag behind the 15 day clock are details into and from career SES, SL/ST positions. Because the Office of the Inspector General has its own separate personnel office, they inform EPA Ethics about career SES positions around the start or departure date. For our ethics dashboard, we created a profile tab for Ethics that DEOs can use to see ethics-related information about their employees, including disclosure report filing status. Prior to this innovation, ethics officials had no automatic way to track this information other than their own manual lists. When DEOs designate employees as confidential filers, they can use the dashboard to track the assignment of the reports and completion dates.
Question 35(b): This number reflects the number of confidential filers for CY 2024. We do not track numbers by Fiscal Year.
Re: Questions 30 and 31, FHFA OIG does not use an electronic filing system. They instead use the .pdf version of the OGE Form 450.
Question #31-The IAF uses an OGE approved alternative 450 form.
May an agency opt out of using Integrity?
#35 NONE
NASA requests that all financial disclosure reports be filed electronically. For rare exceptions, such as if a report originally filed with another federal agency is accepted, an electronic record of the report is maintained in EPTS.
Note that NCUA operates on a calendar year fiscal year, so FY2024 numbers correspond to CY2024.
34(a): This is the amount we pay FDOOnline for both public and confidential filers.
#30 - Excludes SGEs. #35 Data is not included/ is classified and excludes SGEs.
The numbers reported in 35 above are percentages. Actual numbers are made available to cleared OGE personnel when required.
#28: A new administrative procedure will be implemented to ensure new filers are identified within the 15-day timeline.
The other two 278 filers were on detail to OPRR from WHO and filed their reports with WHO through Integrity.gov

There were some tech issues with the DocuTrack (for example, the filer's name did not appear in the e-system and would require a few days to address the tech error). In other instances, some filers desired to submit their forms using a manual version. In order to provide the confidential disclosure form (450 form) to the filer in a timely manner, the majority of the 450 forms were handled in PDF versions.

#35. We reported the number of filers for CY 2024, not FY 2024, as that is the filing cycle.

The agency uses Integrity for OGE 278 reports, and 450 pdf for confidential filers.

Q 33. In our Confidential Financial Disclosure System (CFDS), we use a modified version of the 450 (pdf).

For question 34, the total cost for FDOonline for both public and confidential filers in 2024 was \$165,840. FDOonline does not break down costs between public and confidential filings. The cost was divided in two for purposes of completing the chart.

There is still resistance to using the FD Online system by some Commission Members, specifically those that are tech-adverse, very old, and/or wealthier and have too many holdings to enter manually. For those Members we upload the paper 450 as an attachment.

## PART 8. PUBLIC FINANCIAL DISCLOSURE

**Table 48: Q.36 Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2024, excluding SGEs, and the number of reports actually filed (i.e., received) by December 31, 2024.**

One filer did not submit a report because of a terminal illness.
Seven termination filers, whose reports were due in January of 2025, filed their reports in December of 2024. Two new entrant filers, whose reports were due in December of 2024, were granted filing extensions and submitted their reports in January of 2025.
One of the filers departed CEA and was not assigned a termination report within the reporting period. We have reached out to the filer to assign them the report.
One employee was erroneously identified as a filer and assigned a New Entrant 278 report. Although the filer was initially acting in an SES position, a major Agency re-organization led to the position being re-classified as a GS-15/450 filer before the 278 report was completed.
Discrepancies in the data are due to isolated breakdowns in communication between the Department of Commerce's Human Resources staff and the Ethics Law and Program Office regarding terminations, transfers, or other changes in employment status or filing status for individuals assigned to complete financial disclosure reports. The 1 PAS with an assigned (termination) report due in CY24 that did not file in CY24 filed late on 1/17/25.
A few filers failed to respond to requests to file. The ethics offices are continuing attempts to contact the filers and their supervisors.
One GO filed late in January 2025, she is requesting a waiver of the late filing fee.
Three reports are still within the filing deadline, which fell beyond end of CY2024.
DOE continues to follow up on report not yet received in accordance with public financial disclosure report procedures.
Due to administrative oversight, filer was not instructed to file. The report is currently in progress.
Still working with filers after numerous reminders have been sent.
Two filers died. Delays in HR communications of New Entrant filers, e.g. career promotions to SL covered positions, resulted in failure to collect 3 2024 NE reports during CY2024. In EOIR and EOUSA, extensions and/or overdue filings of 2024 Term Reports extended their collection/filing dates into CY2025. All missing and overdue 278s are being investigated and pursued.
The ethics office is consistently making efforts to contact employees who have not yet submitted their filings. It is a priority to ensure these individuals are aware of their obligations and are doing everything possible to encourage compliance.
The unfiled New Entrant Report and one unfiled Termination Report were filed in early January 2025. Another Termination Report is due in early February. The filer of the missing Combination report is refusing to file the report on advice of counsel and in the midst of criminal proceedings by DOJ. The Department of State Ethics Office continues to follow-up about the missing Combination and Termination reports and will refer filer(s) as appropriate.

<p>One filer was in an acting position and was not assigned a Termination Report due to an oversight the filer was assigned a report as soon as the error was discovered. Another filer departed the agency without completing their annual report, and the agency is actively taking steps to ensure this obligation is fulfilled.</p>
<p>At DO, one filer has been on extended medical leave until he was separated working with him to submit final report. Non-career SES who did not file NE 278 before 12/31/2024 filed in January 2025.</p>
<p>VA has a large number of confidential filers spread throughout the agency, working in various divisions and branches. Senior leadership in VHA, VHA, and NCA coordinated directly with supervisors as to delinquent filers.</p>
<p>One schedule C employee departed without a set termination date. The Office of Ethics worked with the Office of Human Capital as other non-ethics related matters were present. The departed employee filed a Combination report in 2025.</p>
<p>One filer departed the agency before filing and has been contacted to complete the required report.</p>
<p>One 278 filer passed away in 2024.</p>
<p>NASA's ethics program is currently following up on the four outstanding 278 reports for the calendar year.</p>
<p>Discrepancies are primarily because six (6) reports -- 3 new entrant reports, 2 annual reports, and 1 termination report -- required to be filed in 2024 were filed in January 2025. Three (3) additional new entrant reports required in 2024 are pending completion and review/certification by ADAEO.</p>
<p>One report was submitted in January 2025. The other filer's annual report has been delayed due to the employee experiencing a personal hardship. Ethics staff are in communication with the employee.</p>
<p>One employee left the agency without filing a termination report. OGC is working with the employee to rectify the situation.</p>
<p>Two public filers separated from the agency while on extended leave but did not file termination reports prior to their termination dates. Ethics officials have contacted these employees regarding their reports. In addition, new procedures have been developed with the Human Resources department to ensure employees are timely identified and notified regarding termination reports going forward.</p>
<p>With respect to the non-career SES termination report, the filer had until January 27, 2025 to file. She filed on December 27, 2024.</p>
<p>Errors due to untimely notice from HR as well as incorrect non-USG email addresses. USAID is attempting to obtain full compliance, albeit late.</p>
<p>One individual did not file due to an unrelated adverse personnel action.</p>

**Table 49: Q.37 Report the number of public financial disclosure reports certified or otherwise closed by your agency during the calendar year. Exclude reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and section 4.02 of the Public Financial Disclosure Guide.**

Additional information required
Reports were initially reviewed within 60 days but reviewers inadvertently did not track three initial review dates in Integrity.
Commission ethics personnel were training a new staff member on reviewing and certifying public financial disclosure reports. Regrettably, this training led to delays in certification beyond the 60 day deadline. Based on having several late certifications this year, in the upcoming filing season, OGC will institute an internal practice of conducting the initial technical review and conflict of interest analysis within 14 calendar days of receiving the filer’s submission. This should mitigate any risk of untimeliness related to staff experience levels and ensure all reviews and certifications are completed timely within 60 days.
Additional information was being sought
Administrative error.
The one report that exceeded 60 days for review was assigned to a supervisor who left the position during filing season. The new supervisor was not assigned in time to meet the 60-day requirement, so the report was pulled forward and certified on day 61 (day 60 fell on July 4, 2024). Once named, the new supervisor was provided the filer's 278 and reviewed it outside Integrity.
For the reports that were not initially reviewed within 60-days, the delay occurred because we missed the initial review date by a day or two due to administrative oversight. For the reports that we did not meet the 60-day certification and closing dates because the filers either needed to provide additional information or complete amendment before the report could be certified and closed.
As noted below, USDA's Office of Ethics is, proportionally, one of least resourced and smallest Ethics Office of any Cabinet-level Department. At current staffing levels, each OGE 278 financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly 100 OGE-278e reports each year (not counting an even larger number of separate OGE-450 reviews), in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This large report volume combined with a large client population (5,000 employees per one ethics advisor) and a significantly under-resourced Ethics Program makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics has suffered from years of under-investment and is one of the least resourced Ethics Offices of any Executive Branch Department.
The Department of Commerce's Ethics Law and Program Office entered 2024 with a backlog of filed reports that were submitted more than 60 days prior. This backlog was a result of staffing turnover and shortages. The office made substantial progress over the course of

<p>2024 in addressing the backlog older filings were being addressed as new filings were submitted.</p>
<p>The following responses were provided by different major commands. 1) Supervisor absences/unawareness of the need to review and sign the report in Integrity.gov within 60 days delayed the initial review by the Ethics Official in several cases. Six subordinate offices had personnel shortages and failed to notify the Certifying Official that their Ethics Officials were not available to conduct the initial review. Significant health issues of two ethics officials and the sudden death of one senior ethics official caused a delay in review at two offices. Nearly all the major command legal offices remain undermanned and overtasked with other missions, and the long delays in the Air Force hiring process only exacerbate the problems. 2) The technical review for two reports was not done within the 60-day timeline due to an administrative error. The major command's Senior Ethics Counselor will ensure 100% of all 278 reports receive the review within the appropriate timeline.</p>
<p>More information needed, late review by supervisors, amendments to reports required, change in supervisors and ethics officials. The DoD supervisory review requirement, mandated by the Joint Ethics Regulation, necessarily adds to the total review time. Integrity prevents ethics official review until supervisory review is done, which inhibits early ethics counselor action to get supervisors acting on these reports.</p>
<p>OAGC(E) is following SOCO guidance that a report should not be certified if questions to the filer are outstanding which must be answered in order for the ethics official and certifying official to complete review. In most cases, the requests for information were sent to filers. Due to active communication back and forth between ethics official, the certification was completed after the 60-day deadline. However, the clock was tolled for many of these reports due to the confirmation of technical inaccuracies on the OGE 278s.</p>
<p>Primary reasons cited were delays in supervisor reviews, staffing shortages/turnover, and system/technical issues.</p>
<p>Additional information was being sought.</p>
<p>Reports initially reviewed more than 60 days after submission because ethics staff were working on other priority items, including the review and certification of other financial disclosure reports.</p>
<p>In many cases, reviewers were seeking additional information and working with filers to remedy potential conflicts. In one component, reviewers were focused on complex new entrant reports. In another component, some reports were not assigned to review due to administrative oversight.</p>
<p>Awaiting filer response to request for additional information.</p>
<p>One report was assigned to an ethics official who went on maternity leave shortly thereafter. By the time EAD realized the error and assigned it to another ethics official, the 60 days had passed.</p>
<p>In components with large numbers of reports, heavy workload of reviewers and certifying officials caused delays. In some components, a shortage of or turnover of reviewing officials, DDAEOs, and certifiers caused delays. EOIR: significant increase in the number of filing positions, and the general complexity of new entrant reports with no increase in the staff of reviewers caused delays. EOUSA: significantly large number of reports with consistent</p>

increase in their general complexity caused delays, as well as staffing shortage (only one reviewer).
Almost all delays can be attributed to ongoing conversations with filers to seek additional information.
The Department's initial report reviews are performed by bureau/post supervisors, who on occasion are not able to complete their reviews in the first 30 days after submission. Many of the reports required additional information and several required multiple exchanges with the filers.
Certain reports were certified or closed more than 60 days after submission because filers were in extended travel or leave status or otherwise were unavailable to respond to ethics officials' questions about the reports in question.
Workload and staffing issues caused some delays. Additionally, filers were sometimes not responsive to providing additional information.
VA has a large number of public filers spread throughout the agency, working in various divisions and branches. Senior leadership in VHA, VHA, and NCA coordinated directly with supervisors as to delinquent filers.
Although the EPA Ethics Office is fully staffed in accordance with our allotted FTE, we simply do not have enough people to meet all of our programmatic and counseling obligations. At times, we must make the hard decision to let one ball fall to the ground as we juggle all of the others. To improve our situation, EPA Ethics had added two more reviewers (for a total of five) so that we have more people who are becoming more adept at 278 review.
Additional information being sought from filer
Additional information was being sought.
The review was completed on day 61 and formally certified on day 62. The initial reviewer started paternity leave prior to completion and the initial review had to be reassigned.
Usually delays are due to the need for additional information from filers. Additionally, our agency has a disproportionately high number of public financial disclosure filers for our size.
There were technical difficulties with assigning the Termination report within Integrity. The filer was granted extensions by the ADAEO to get the disclosure report filed.
MCC had major transitions within the ethics department which lead to some reports being reviewed more than 60 days late.
After action revealed staffing shortages and process issues related to features with the agency's automated tracking system, both of which are being addressed.
Three reports were not reviewed within the 60 day window because of administrative oversight.
In each case, additional information was being sought.
Turnover in majority of the ethics team and staffing challenges.
The numbers reported in 36 and 37 above are percentages. Actual numbers are made available to cleared OGE personnel when required. Although the agency increased resources from the prior year for financial disclosure reviews, the agency still requires additional resources in order to ensure all forms can be reviewed within the 6-day time period. Some forms were held for review by the supervisor for much or all of the 60-day review period,

<p>which the agency believes will improve in 2025 due to DoD's requirement for supervisors to review within 14 calendar days of receipt.</p>
<p>Some reports from CY2023 had late initial reviews, which were completed during CY 2024. Ethics team discussions on methods to improve review and certification times were held early 2024. We have added additional program checks to ensure initial reviews are completed within 60 days and have updated ethics staff elements and standards to include detailed metrics tied to the quantity, quality, and timing of reviews. All forms submitted in 2024 had initial review completions within 60 days.</p>
<p>OMB OGC was working with some 278 filers on their report but did not list that interaction as a first review until more than 60 days had elapsed. Greater than expected arrivals and departures, together with excessive workload during report review season also delayed some reviews beyond 60 days.</p>
<p>Only three reports were reviewed more than 60 days after submission, most likely an oversight.</p>
<p>Our Ethics program is made up of staff for whom ethics is a small portion of their day to day responsibilities, and unfortunately the deadlines were missed. The Peace Corps greatly benefited from a detailee dedicated to ethics during the first part of 2024.</p>
<p>Due to an error regarding employee tracking, three reports were not identified for review until more than 60 days after submission. Ethics and Human Resources now use automated notification systems to assist with employee tracking.</p>
<p>Please see explanation below.</p>
<p>Inadvertent delay in assigning forms to attorneys and/or workload conflicts for assigned attorneys.</p>
<p>1 termination report wasn't certified in 2024 because the filer left last month in December. We are still within the 60-day window to review/certify. The second report was an annual report certified late because the reviewer was seeking clarification.</p>
<p>There was a lot of back and forth making sure the report was accurate.</p>
<p>Additional information was being sought and competing priorities and workload challenges.</p>
<p>In general, several reports, including two New Entrant reports, required additional information and the ethics office sought remedial actions, taking the reviews over 60 days. Twelve were certified prior to the 60 days but the certification didn't register in the Integrity system until day 61 or 62. Four are New Entrant reports and they were over 60 days due to substantial revisions and the implementation of remedial actions. The oldest one was certified at 91 days and this was due to the filer taking a substantial vacation/leave during the review period that delayed the program receiving key supplemental information. In appropriate cases, recusals and ethics agreements were implemented. In a few cases, although we did an initial review, we did not enter an end initial review date on the report due to oversight and a lack of familiarity with the end initial review option in Integrity while the report was being held for additional information or responses.</p>
<p>Staff shortage, new staff learning the 278 procedures, and additional information being sought.</p>
<p>The agency had just one ethics official available to review and certify reports. Lack of human capital led to some delays.</p>

High volume of new and complex filings which required additional guidance, review, and follow-up.
Several reports required more than 60 days to review due to a personnel change involving the reports reviewers and due to additional information being sought.

**Table 50: Q.37 Report the number of public financial disclosure reports certified or otherwise closed by your agency during the calendar year. Exclude reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and section 4.02 of the Public Financial Disclosure Guide.**

Commission ethics personnel were training a new staff member on reviewing and certifying public financial disclosure reports. Regrettably, this training led to delays in certification beyond the 60 day deadline. Based on having several late certifications this year, in the upcoming filing season, OGC will institute an internal practice of conducting the initial technical review and conflict of interest analysis within 14 calendar days of receiving the filer’s submission. This should mitigate any risk of untimeliness related to staff experience levels and ensure all reviews and certifications are completed timely within 60 days.
a.iii. The one new entrant report that was not certified within 60 days was for our DAEO. OGE certified this report, not a DLA ethics official. In b.iii, one report was certified by OGE after 60 days, in the other we were waiting on information from the filer before certifying.
Significant health issues of two ethics officials and the sudden death of one senior ethics official caused a delay in certification at two offices. Nearly all the major command legal offices remain undermanned and overtasked with other missions, and the long delays in the Air Force hiring process only exacerbate the problems.
See above.
staffing shortages
Due to extended leave, reassignment of report for review and certification. Information was being sought by HUD OIG.
In components with large numbers of reports, heavy workload of reviewers and certifying officials caused delays. In some components, a shortage of or turnover of reviewing officials, DDAEOs, and certifiers caused delays. EOIR: significant increase in the number of filing positions, and the general complexity of new entrant reports with no increase in the staff of reviewers caused delays. EOUSA: significantly large number of reports with consistent increase in their general complexity caused delays, as well as staffing shortage (only one reviewer).
Many of the reports required additional information and several required multiple exchanges with the filers.
VA has a large number of public filers spread throughout the agency, working in various divisions and branches. Senior leadership in VHA, VHA, and NCA coordinated directly with supervisors as to delinquent filers. Workload and redistribution of reports due to Certifiers leaving the Agency.

In addition to not being able to meet all of our programmatic obligations all of the time, we note that filers do not always respond with alacrity to questions or requests for clarification.
One Career SES new entrant report and one Career SES termination report were not certified within 60 days because the certifying official retired on December 31, 2024, but was on leave for a few days before the end of the year. The replacement certifier did not receive official certifying status within Integrity until mid-January 2025. The two reports were certified at that time.
Two forms were certified after the 60-day period, one on day 62 and the other on day 61. As to the form certified on day 62 the certifier made certification within 24 hours of the completion of the initial review. As to the form certified on day 61, the certifier made certification within 24 hours of the completion of the initial review.
The DAEO's report is certified by OGE. Although the initial review by the ADAEO occurred within 60 days, OGE's certification was after 60 days.
Technical difficulties with Integrity, merging a .gov Integrity account with a private Gmail account since the filer no longer had access to the .gov account.
See explanation above for reports being reviewed more than 60 days after submission.
Given the small size of the agency and the transition of the DAEO without overlap during mid-year, the certification delays were purely an administrative oversight. This was identified by the OGE inspection and NCPC is working to remedy this moving forward.
See explanation above for more information.
Reports were certified after 60 days due to needing additional information and staffing shortages.
Due to an error in employee tracking, the reports were not identified for review.
Delay in review by certifying official
While there were uncharacteristic delays in the review and certification in a number of our 278 public financial disclosure reports, some of these delays were due to staffing shortages after we lost our senior financial disclosure specialist and an ethics attorney (two of our four full time staff members) in the lead up to the 278-filing season. Our senior financial disclosure specialist who had independently managed the financial disclosure program for over 20 years retired in early 2024. To mitigate the transition of the financial disclosure program to a new specialist, we planned for her return as a part-time retired annuitant to assist during the 278-filing season and to continue to train the new financial disclosure specialist to assure that the 278 reports were properly reviewed for conflicts. As such, the reports were reviewed individually and together, taking significant time to ensure that transfer of institutional knowledge was complete for program continuity in years to come. The plan was that the remaining members of the team would also cover the 278 reviews as well. However, with the unexpected departure of the staff attorney in early May, the overall program workload significantly increased for the duration of the filing season. Combined with an unusually busy election season, the remaining team members were required to cover 278 reviews and address the increased workload related to other pressing needs of the agency. We are now fully staffed and operating at full capacity. In addition, the newest member of the team (a senior ethics attorney) has significant experience with financial disclosure, specifically in the review of 278 reports which will alleviate any issues moving forward.

The agency had just one ethics official available to review and certify reports. Lack of human capital led to some delays.

**Table 51: ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds.**

36(a) and 37(a): 1 New entrant OGE-278 report filed in 16 December 2024 and was pending certification on 31 December.
Q37. (Continued) 3) Some supervisors transferred or retired before signing the reports of their subordinates. HR at these installations does not notify the ethics offices that supervisors had departed.
Q39: Certification of reports where late fees were incurred was delayed awaiting confirmation of late fee payment or waiver. Q42: Approximately 1250 reports were released.
Q41: IRS received 2 OGE 201 requests, but one was not perfected so no documents were released.
The number of requests for public financial disclosure reports and documents released, provided in response to questions 41 and 42, largely relates to candidate reports filed with the FEC pursuant to its role under the Ethics in Government Act as the point of entry for personal financial disclosures made by candidates for President and Vice-President.
As to question 41, we are still actively processing a single request which seeks 43 Public Financial Disclosures Form 278.
Para. 36(b)-37(b): One PAS public filing was a Nominee Report.
No. 42: The Commission doesn't track this information so the number of documents is unknown.
Does OGE notify the agency if it receives a request for a filer's public financial disclosure report and provides the report? This is related to question 41.
# 36 - #39 Data is not included/is classified
Questions #36 and #37: The response to question #36 reflects that one PAS Termination OGE Form 278e was filed as required by December 31, 2024. This report was not reflected in the response to question #37 because it was under review and not yet certified in 2024 but was timely reviewed and certified in calendar year 2025. Questions #41 and #42: The response to question #41 reflects that the Ethics Office received two requests during 2024. As reflected in response to #42, the Ethics Office did not release any documents under the Ethics in Government Act in calendar year 2024 as it not have any records responsive to the two requests received.
37. Nine (9) reports -- 3 new entrant reports, 4 annual reports, and 2 termination reports -- required to be filed in 2024 were certified in January/February 2025. Those reports were initially reviewed and certified within 60 days of filing except for two annual reports and one termination report.
Q41 and Q42. Numbers reported are for those requests relating only to OGE employees. In CY2024, OGE also received a total of 4,997 requests for public reports and released 12,559 documents under EIGA relating to all executive branch employees.

<p>The other two 278 filers were on detail to OPR from WHO and filed their reports with WHO through Integrity.gov.</p>
<p>In 2024, there was one set requested under the Ethics in Government Act, but they have not yet been released.</p>
<p>Q. 36 and 37: There are a few reports for which the “certifier type” is mislabeled, but the figures here reflect the correct totals and filer types. Q: 41 and 42: Reports are posted on the White House website and may be pulled by the public. We have provided an estimate of the reports requested from the website based on available data.</p>
<p>RE: #41” request was for public financial disclosure reports but the filers were not public financial report filers.</p>
<p>For the AbilityOne Commission, as depicted in Questions 36 &amp; 37, and excluding SGEs, there are three (3) public financial disclosure report filers. Two (2) public filers are Career SES employee, and in the "Other" category, the Commission's DAEO is also a public filer.</p>
<p>The agency did not track the number of public financial disclosure requests.</p>
<p>Q36 and 37: There are a few reports for which the “filer type” is mislabeled, but the figures here reflect the correct totals and filer types. Q41. and 42.: Reports are posted on the White House website and may be pulled by the public. We have provided an estimate of the reports requested from the website based on available data. In addition to WHO, these figures also reflect some requests for public financial disclosures reports of employees in the Office of the Vice President, the Council of Economic Advisors, and the National Security Council.</p>

## PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

**Table 52: Q.43 33** Report the number of confidential financial disclosure reports required to be filed by December 31, 2024, excluding SGEs, and the number of reports actually filed by December 31, 2024.

<p>One 450 filer was on extended leave for all of CY 2024.</p>
<p>DCSA had two New Entrant OGE Form 450 filers whose reports were not required to be filed by December 31, 2024 [the reports were not due until January 2025], but who submitted their reports in December 2024.</p>
<p>Fifteen reports were required but not filed 14 of the 15 were new entrant reports and 10 of the 15 were assigned in October and November of 2024. They were predominantly newly-designated filing positions resulting from an agency-wide review of filing statuses conducted in October 2024. Supervisors may not have adequately communicated the filing requirement to employees in newly designated positions identified during this tasking.</p>
<p>These numbers reflect a successful filing rate of 99.7%. However, some employees failed to file due to transfers to other agencies, leaving government, or long term leave. A small number of employees simply failed to submit their reports despite being on duty and receiving more than 20 past due filing notices from the USDA Office of Ethics.</p>
<p>Discrepancies in the data are due to isolated breakdowns in communication between the Department of Commerce's Human Resources staff and the Ethics Law and Program Office regarding terminations, transfers, or other changes in employment status or filing status for individuals assigned to complete financial disclosure reports.</p>
<p>The following responses were provided by different major commands. 1) During the end of 2024 review, Certifying Officials in the major command identified seven individuals who should have filed a new entrant report but had not been assigned one in a timely manner. They were assigned those new entrant reports in Jan 2025. These filers will also be required to file a 2025 annual report (covering 2024) since they served in a covered position for &gt;60 days in 2024. Three other individuals still have their new entrant reports in draft form and were reminded of the requirement to file but had not done so prior to 31 Dec 24. 2) The discrepancy in reports filed in one major command is due to a disconnect between employees leaving the unit or the Air Force and units failing to update FDM. 3) One major command stated that in some cases filers were reassigned to other organizations before the filing deadline, but they still appear in the FDM e-filing system under this major command. Some new entrants are overdue in submitting their reports. The legal office is working with the supervisors to collect the reports. 4) The incumbent left a covered position prior to completing the filing. 5) A change of command in a unit caused the delay in the supervisor review for one report out of 71 reports. 6) The filer misunderstood the filing requirement and did not complete the report prior to departing the Air Force.</p>

<p>Filing affected by HR office challenges with accurately or timely notifying the servicing ethics office of incoming financial disclosure report filers, combat zone extensions, inaccuracies in FDM filer list maintenance (such as employees assigned reports but departing the agency prior to filing and not being removed from the system). As stated in question 12, we have developed a system of notification from the Army Civilian Human Resources Agency (CHRA) directly to Army OGC of all new entrant filers across the Army Enterprise. We now receive these new filer lists in a searchable and sortable excel worksheet every pay period. We then distribute to the appropriate DDAEOs who in turn, distribute to local installations' and organizations' ethics officials. We expect this to significantly improve our new entrant financial disclosure filer tracking.</p>
<p>Due to late assignments or follow-ups for information to identify filers, some reports were not filed properly.</p>
<p>Primary reasons cited were a significant expansion of an organization (and subsequent reorganization), late filer notifications, and new filers identified during annual reviews of filer roles.</p>
<p>Filers on extended leave. One component performed a system audit in late 2024 and identified new entrant filers who had not been notified to file due to administrative oversight. All have since been notified.</p>
<p>required filer was on extended sick, admin or military leave through 2024.</p>
<p>There is a question whether the employees are required to file financial disclosures. EAD is working with the Administrative Officers to confirm whether the duties of these filers require them to file financial disclosures.</p>
<p>Some filers left the Department before filing, some components had employees on extended leave for the entire year. Some components contacted supervisors and were still unsuccessful with employees filing. DEO has provided support and guidance to components where not all required reports were filed.</p>
<p>All were due to extended leave.</p>
<p>All of the unfiled reports were assigned near the end of the calendar year. FDM had significant unplanned lapses in connectivity in Sept., Oct., and late December that frustrated our reviewers and filers alike, and limited our filers' ability to enter FDM and complete reports. The Department's Ethics Office continues to follow-up on the remaining reports (due by 12/31/2024) to address the filer's technical difficulties in logging into FDM.</p>
<p>Some filers were on extended leave and were not able to file by the end of 2024.</p>
<p>Three Filers were on extended leave another three Filers submitted in early January 2025. Remaining Filer had delay on-boarded effective 12/1/2024 (PP24), with a due date of 12/31/2025, but did not receive computer to submit the OGE 450 until January 2025.</p>
<p>Two confidential filers failed to complete their reports.</p>
<p>One 450 filer was on extended medical leave through calendar year 2024 and thus was unable to file.</p>
<p>11 filers left the agency before completing their reports, one filer was on military leave, and one filer was on extended sick leave.</p>

The Ethics Office experienced a staffing transition in 2024 and no longer has access to information that might explain the apparent discrepancy.
Employees left the Commission, or maternity leave, detailed, military leave, sick leave, or deceased.
2 employees are on military leave.
Reasons for discrepancies include some employees retiring at the end of the year omitting to file, and four employees at one location not initially being notified to file, with their forms being requested to be provided as soon as possible.
One OGE 450 and one alternate form were not received during the filing window. We are following up on both forms.
The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. One entrant filer did not file. The employee went on extended leave almost immediately after entry on duty and did not come back in 2024.
One filer remained on long term leave and was unable to file their report in 2024. That filer will complete their report as soon as they return to OMB.
OSTP OGC sent requests to staff who were required to file 450s with instructions on how to file during their onboarding, and during the annual filing season. OGC also sent reminder notices to those required to file 450s. The filer did not respond to these requests during the different stages of the review process, such as the filer did not respond after the initial review of the filer's 450, and/or departed OSTP without addressing OGC's requests. Few staff spoke with the Acting General Counsels about the 450 requests, and these discussions were not disclosed or addressed with other OGC staff prior to the Acting General Counsel's departure.
2 reports were due in December but were not received. Filers have been reminded of their obligation to file
The USAGM Ethics Office faced significant personnel changes over the course of calendar year 2024. All previous employees working on ethics issues departed the agency. Record keeping suffered as a result. Additionally - although it does not justify the delinquency - a recent internal agency audit determined that a significant number of employees were misidentified as filers. For next year, the agency will right size the number of filers and ensure higher compliance.

**Table 53: Q.44 Report the number of confidential financial disclosure reports certified or otherwise closed by your agency during the calendar year. Exclude reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and the Certification Requirements section of the Confidential Financial Disclosure Guide.**

Additional information was being sought from filers to perform full conflicts analysis.
An issue with FDOonline prevented 3 existing employees who were newly identified as new entrant filers from having their 450s reviewed within 60 days. It took a little over three months to resolve the issue, at which time the 450s were then immediately reviewed and certified. The matter was closed with successful review and certification of those 450s.
Commission ethics personnel were training a new staff member on reviewing and certifying public financial disclosure reports. Regrettably, this training led to delays in certification beyond the 60 day deadline. Based on having several late certifications this year, in the upcoming filing season, OGC will institute an internal practice of conducting the initial technical review and conflict of interest analysis within 14 calendar days of receiving the filer’s submission. This should mitigate any risk of untimeliness related to staff experience levels and ensure all reviews and certifications are completed timely within 60 days.
One OGE-450 filer was out of the office on extended leave. Delay in review and certification of filer's report was due to delayed notification of filer's return to duty status.
Atypical demands on the Ethics Office during the filing review season resulted in less than 1% of confidential reports receiving a full technical review and conflict analysis during the initial 60 day review period.
Confusion on filing due to filing at a previous agency
DCAA reorganizes Supervisors, and DOD Supplement 5 CFR 3601 requires all Financial Disclosure Reports to be reviewed by Supervisors before being reviewed by Ethics Attorney. Therefore, delayed Supervisor review may cause delay to the 60 day Ethics Attorney review. In several cases, the data on the OGE 450 was also used to decide Threats to Independence under Generally Accepted Government Auditing Standards (GAGAS). OGE 450 is used at DCAA as a tool for Threats to Independence as well as Conflicts of Interest. Therefore, supervisors were coincidentally addressing potential Threats to Independence during their reviews.
Some reports were reviewed untimely due to delays in supervisory reviews. It is also likely that some initial reviews were completed timely, but the report certifiers failed to properly end the initial review in the FDM filing system.
The DoD Joint Ethics Regulation requires that supervisors conduct an intermediate review and sign all reports, which can lead to delays in review and certification.

At current staffing levels, after a 20% budget cut in FY2024, each financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly nine hundred (900) OGE-450 reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This very large report volume combined with a very large client population (5,000 employees per advisor) makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics is one of the least resourced Ethics Offices of any Executive Branch Department. Despite those challenges 96.7% of 450 reports submitted in 2024 were certified, and 92.3 of those were reviewed within 60 days.

The Department of Commerce's Ethics Law and Program Office entered 2024 with a backlog of filed reports that were submitted more than 60 days prior. This backlog was a result of staffing turnover and shortages. The office made substantial progress over the course of 2024 in addressing the backlog older filings were being addressed as new filings were submitted.

The following responses were provided by different major commands. 1) Some supervisors failed to complete their reviews within 60 days, despite numerous reminders by the 450 Certifying Officials. Other offices had personnel shortages and absences that delayed their initial reviews. 2) Some subordinate offices experienced a turnover of ethics counselors resulting in a delay of review of the OGE Form 450s. In other cases, reports were amended and signed by the filer, but supervisor's signature was delayed despite repeat notices and attempts to coordinate action. 3) In the majority of cases at one major command, additional information was being sought. However, at the numbered Air Force and major command levels there were also issues regarding coordination with senior officers around official duty travel schedules. 4) Other mission requirements and manpower shortages across the major command caused the delay in report reviews. 5) Personnel turnover led to some delays in the initial review. 6) There were manpower issues at the major command and some of its installations. 7) The legal office experienced a turnover of ethics officials, which slowed the reviews of the 450s. There were complex filings that required additional information. 8) Ethics staff was learning the FDM e-filing system during filing season and did not understand how to use the system to maintain visibility of the status of the reports. 9) Ethics office did not have sufficient resources to process reports. 10) The major command had new POCs and certifiers in the financial disclosure program that needed training. Some filers and supervisors were on leave or on official duty at other locations and did not acknowledge reminder emails that the ethics office sent. 11) One ethics office reported that it determined that all 59 of its OGE Form 450s were initially reviewed within 60 days but that ethics officials did not click on the "end initial review" button in the e-filing system within 60 days. 12) One ethics office had significant staffing shortages in CY 2024, which led to the delay in the initial review. Many of the reports were reviewed within 100 days. The remaining reports were reviewed more than 100 days after filing because the office encountered a technical problem with FDM and worked with the major commands to identify a solution. The reports were reviewed and certified once a solution was identified.

DoD requirement of supervisory review, mandated by the Joint Ethics Regulations, necessarily adds to total review time. Also, requests for additional information or clarification, extremely large volume of reports, difficulty of keeping track of individual New Entrant report filers after the annual report season, late supervisory reviews, inconsistent oversight, ethics personnel shortfalls, and combat zone extensions contribute to slow processing.
Technical issues, filer failed to timely respond to request for information, ongoing discussion between ethics official and filer to obtain clarifying information, late identification of a new filer from HR.
Primary reasons cited were a significant expansion of an organization (and subsequent reorganization), delays in supervisor reviews, staffing shortages/turnover, and systems/technical issues.
Additional information was being sought
Reports reviewed more than 60 days after submission due to competing priorities of reviewers
Staffing shortages, management reorganizations, seeking additional information from filers.
Awaiting filer response to request for additional information. Delayed supervisory review.
EAD received late notifications updating the applicable region numbers for the filers, which determine who is assigned to review the reports.
Reviewers were waiting for additional information. Some reviewers were on extended leave, and/or filers were on extended leave and unavailable to provide additional needed information.
Seeking additional information.
FDM had significant unexpected lapses in connectivity in Sept., Oct., and late December. In addition, many of the reports required additional information and several required multiple exchanges with the filers.
Certain reports were reviewed more than 60 days after submission due to inadvertent oversights in tracking the 60-day review time frame for submitted reports.
In most cases, additional information was being sought from the filer.
Conflicting priorities for reviewers who are not full-time ethics staff additional information being sought.
Workload and redistribution of reports due to Certifiers leaving the Agency. The disparity in numbers can also be explained through VA transitioning from FDM.mil to FDOOnline, and loss of access in the transition period for certifiers.

<p>Under EPA's decentralized ethics program, more than 120 DEOs oversee the confidential financial disclosure system. They reviewed 94% of e450s within 60 days and certified 88% within 60 days. Typical reasons for not meeting the deadlines include: (a) new or changing ethics officials who are inexperienced and do not know how to proceed, and (b) delay in getting electronic forms re-routed. During 2024, EPA Ethics deployed an improvement to the e450 electronic filing platform to be able to more precisely track the 60-day review clock. The statistics reflected in this annual questionnaire show an improvement and, now that our DEOs are more familiar with the improved metric, they are better able to use it to help triage the review of pending e450s. Consequently, EPA Ethics expects accurate and higher compliance statistics in CY 2025.</p>
<p>For three reports, our team member encountered some technical</p>
<p>Reports with initial reviews completed more than 60 days after submission were due to workload-related delays and tracking inaccuracies when reviewers inconsistently record timely initial review completion, resulting in timely initial reviews that appear late based on the final certification date.</p>
<p>The Ethics Office experienced a staffing transition in 2024 and no longer has access to information that might provide an explanation.</p>
<p>Additional information was being sought</p>
<p>Hundreds of reports are reviewed and certified by supervisory managers in offices and divisions throughout the FTC. Despite repeated reminders from the Ethics team, inevitably a small number of managers fail to timely review and certify reports.</p>
<p>After action revealed staffing shortages and process issues related to features with the agency's automated tracking system, both of which are being addressed.</p>
<p>A number of forms were reviewed and certified on the day following the 60th day due to administrative oversight. Other forms were reviewed outside of the 60th day because of administrative oversight. The agency has moved to an electronic OGE 450 system for CY 2025 that should allow for better tracking of forms and timely review.</p>
<p>Turnover in majority of ethics team reviewing reports, staffing challenges.</p>
<p>The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. Although the agency increased resources from the prior year for financial disclosure reviews, the agency still requires additional resources in order to ensure all forms can be reviewed within the 6-day time period. Some forms were held for review by the supervisor for much or all of the 60-day review period, which the agency believes will improve in 2025 due to DoD's requirement for supervisors to review within 14 calendar days of receipt.</p>
<p>Some reports were reviewed more than 60 days after submission due to staffing shortages.</p>
<p>Other ethics workload contributed to two initial reviews completed shortly after the 60 day mark.</p>

Note that this response shows more reports certified than required to be filed in 2024. That is because this response includes reports due and submitted in 2023 reports which were certified in 2024 and reports that were submitted and certified in 2024 even though they didn't need to be submitted until 2025. OMB OGC was working with some 450 filers on their report but did not list that interaction as a first review until more than 60 days had elapsed. Greater than expected arrivals and departures, together with excessive workload during report review season also delayed some reviews beyond 60 days.
Did not always receive notification that current employee's status had changed to confidential filer status (due to promotion, change in duties).
One report was reviewed and certified more than 60 days after submission due to an error regarding employee tracking. Ethics and Human Resources now use automated notification systems to assist with employee tracking.
Of the 1.1% late reviews (47 filings) the majority were less than ten days late, four were returned by the reviewer for additional information, and at least one experienced technical issues with our Confidential Financial Disclosure System (CFDS) resulting in a late review. The majority of the late reviews were by intermediate reviewers causing the final reviewers to certify late.
additional information required, workload, extended leave
Inadvertent delay in assigning forms to attorneys and/or workload conflicts for assigned attorneys.
Due to competing priorities and workload challenges, some reports were reviewed more than 60 days after submission.
Additional information required and/or administrative delays in changing reviewing officials within the electronic system due to worldwide mobility agreement (permanent change of station).
The agency did not track the number of forms reviewed and certified within 60 days.
High volume of new and complex filings which required additional guidance, review, and follow-up.

**Table 54: Q.44 Report the number of confidential financial disclosure reports certified or otherwise closed by your agency during the calendar year. Exclude reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. "Initially reviewed within 60 days" means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605 and the Certification Requirements section of the Confidential Financial Disclosure Guide.**

two forms were reviewed within the 60-day time frame and intended to be certified but were mistakenly not certified within the 60-day time frame.
Commission ethics personnel were training a new staff member on reviewing and certifying public financial disclosure reports. Regrettably, this training led to delays in

<p>certification beyond the 60 day deadline. Based on having several late certifications this year, in the upcoming filing season, OGC will institute an internal practice of conducting the initial technical review and conflict of interest analysis within 14 calendar days of receiving the filer's submission. This should mitigate any risk of untimeliness related to staff experience levels and ensure all reviews and certifications are completed timely within 60 days.</p>
<p>One OGE-450 filer was out of the office on extended leave. Delay in review and certification of filer's report was due to delayed notification of filer's return to duty status.</p>
<p>Confusion on filing due to filing at a previous agency</p>
<p>Even with an increase in our number of filers, the Ethics Program was able to improve its 60-day completion rate by approximately 15% from CY23. This improvement is attributed to assigning additional personnel to financial disclosure reviews and restructuring the Program's review process. However, adequate staffing remained a challenge for CY24. We relied heavily on our Program's support staff, as we had only three attorneys who were able to dedicate significant time to reviews. In CY25, we are again evaluating our staffing and workflow for 450 reviews to continue improving on our completion rate.</p>
<p>There are 5 reports still pending certification but are within the 60-day review and certification window. 10 reports were certified and closed more than 60 days after submission because the filer did not provide additional information or amendments requested. 6 reports were closed and certified after the end of the reporting period but within the 60-day review and certification window. The remaining 8 reports were not filed prior to the end of the reporting period (December 31, 2024), therefore those reports will not be included in the table above.</p>
<p>The following responses were provided by different major commands. 1) Some subordinate offices experienced a turnover of ethics counselors resulting in a delay of certification of the OGE Form 450s. In other cases, additional information was sought or remedial action on individual reports was required resulting in delay of certification. In some cases, supervisors caused a delay based upon their supervisory review not being signed early enough to complete. The major command's Senior Ethics Counselor is working to reduce delay in review and certification by improving coordination with subordinate offices and by working with supervisors of filers to get reports signed, amended as necessary, and reviewed on time. 2) Supervisors failed to review in a timely manner. The filer's supervisor changed after the report was signed by the filer and there was a delay changing the supervisor in the FDM e-filing system. 3) Personnel turnover led to some delays in certification. 4) The installation had manpower issues. The installation has since onboarded a new support staff member who will be dedicated to OGE Form 450 admin for the next reporting year, which should improve the statistics. The installation lost all of its civilian attorneys in CY 2024, but was able to hire two attorneys who will assist with the financial disclosure program. 5) Some legal offices experienced a turnover of ethics officials, which slowed the reviews of the 450s. 6) Ethics officials in some legal offices were not very familiar with the FDM e-filing</p>

<p>system. For example, they did not know how to use the “manage exceptions” function or they could not find a report that had been filed. In addition, some supervisors could not find reports in the FDM e-filing system. As a result, some reports were open longer than usual. 7) Some supervisors did not sign the reports within 60 days, and the ethics official cannot sign until the supervisor signs the report. 8) The major command encountered technical issues with FDM.</p>
<p>We were researching an issue that we had not encountered before.</p>
<p>See above.</p>
<p>staffing shortages</p>
<p>For the annual reports, OLC certified 99% within 60 days after submission. The majority of reports reviewed and certified more than 60 days after submission were new entrant reports, which were affected by factors such as delays at the L1 Supervisor review level, or issues with system notifications. OLC is taking steps to reduce these delays. Additionally, some of these reports went uncertified because of employees on extended leave, OLC was awaiting employee responses, or because there were potential conflicts of interest involving real estate holdings.</p>
<p>Certain reports were certified or closed more than 60 days after submission because filers were in an extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status or otherwise were unavailable to respond to ethics officials' questions about the report.</p>
<p>Workload and redistribution of reports due to several EST certifiers leaving the Agency, as well as some confidential filers leaving the agency.</p>
<p>Some DEOs are responsible for only a few e450s while others have to review dozens, even hundreds. Not surprisingly, ethics officials with many e450s may take longer to certify forms. EPA Ethics continues to use the ethics dashboard to drill down on individual DEO compliance and sends out status updates to those DEOs who are not meeting compliance deadlines. While we once again identified some individual DEOs who were lagging behind in reviewing submitted reports, we observed a marked improvement over last year.</p>
<p>See above.</p>
<p>One report certified on the 61st day. The Ethics Office experienced a staffing transition in 2024 and no longer has access to information that might provide an explanation.</p>
<p>Hundreds of reports are reviewed and certified by supervisory managers in offices and divisions throughout the FTC. Despite repeated reminders from the Ethics team, inevitably a small number of managers fail to timely review and certify reports.</p>
<p>Some reports were certified and closed after the 60 days due to reviewers workload.</p>
<p>additional information was being requested, and the employee was slow to respond.</p>
<p>See explanation above for reports being reviewed more than 60 days after submission.</p>
<p>Given the small size of the agency and the transition of the DAEO without overlap during mid-year, the certification delays were purely an administrative oversight. This was identified by the OGE inspection and NCPC is working to remedy this moving forward.</p>
<p>See explanation above for more information.</p>

Staffing shortages.
One report was reviewed more than 60 days after submission due to an error in the employee tracking system. Ethics and Human Resources now use automated notification systems to assist with employee tracking.
See explanation above
administrative delays in changing reviewing officials within the electronic system due to worldwide mobility agreement (permanent change of station).
The agency did not track the number of forms reviewed and certified within 60 days.

**Table 55: ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. Table 55**

Question 43 and 44: Numbers are classified.
Question 45: In most cases, filing extensions were granted to New Entrant filers because the filer received late notice to file his or her OGE Form 450. The filers received late notice because the agency could not add them as filers to the FDM electronic filing system until they received a Common Access Card (CAC) and had a functioning DCSA email address, which often occurred several days or weeks after the employees' appointment date and prior to the employees assuming their duties.
One report was filed in late 2024 but it was not certified prior to 1/1/25 (though still within the 60 day window).
The Department of Defense requires that supervisors review reports in addition to the OGE 450 certifying official. In some cases, the dual level of review impacts the OGE 450 certifying official's final certification.
Q43 EOUSA: 6,152 line AUSAs file the alternative Form 450 (the GCO-1) in their assigned cases.
Question 43: The ethics office collects FCA Form 449s from applicable filers every three years, with 2023 being a collection year. In 2024, employee's who filed the FCA Form 449 were either new entrants or employees promoted into the filing position.
Question 43: One employee filed the Confidential Financial Disclosure Report, OGE 450. Three other employees file the Confidential Conflict of Interest Certification Form, FCA Form 449. However, the ethics office collects FCA Form 449s from applicable filers only every three years, with 2023 being a collection year. FCSIC did not have any new FCA Form 449 filers in 2024.
#43, #44, and #45 Data is not included/is classified.
Five 450 filers were on detail to OPR from WHO and filed their 450 reports with WHO.
44 and 45: Similar to 2022 and 2023, OSTP continued to have a high volume of onboarding staff members with a very small number of OGC staff. Additionally, in 2023, OSTP OGC had temporary General Counsels who stayed with the agency and departed within a few months of their start date at the agency. The frequent management turnovers and minimal support on the legal team with high volume of onboarding staff members created difficulty in addressing all 450 reports in a timely manner. There were delays in obtaining information from some filers, the DAEO/Acting

General Counsels did not disclose crucial information to the ADAEO or other members of the agency's legal team. Filers communicated extension requests with the DAEO/Acting General Counsels about their reasons for these extensions. The DAEO/Acting General Counsel did not disclose to the ADAEO and other members on the legal team about the granted extensions. The number of extensions granted that is indicated in question 45 is an estimate and of those individuals that the current OSTP legal team is aware of. The DAEO/Acting General Counsels also did not disclose to the ADAEO or other members of the agency legal team the discussions that they had with filers about their COIs and remedial measures that were used to address the potential COIs. Moreover, OSTP had a high number of detailees and they provided copies of their certified 450s. These reports would not have been certified by OSTP OGC given they were already reviewed and certified by their home agencies. OSTP OGC reviewed these reports but did not certify the 450s that the detailees had on file with their home agencies.

As noted above, we have a human capital issue. Until we brought on an ethics detailee to assist us in the fall of 2023 through the Spring of 2024, there was only one attorney reviewing these reports, and they have significant additional duties outside of their ethics responsibilities. We are working to better prioritize a timely review of these reports going forward.

The difference between the number reported in response to question 43 and the number reported in response to question 44 is because due to a mistake, one report was inadvertently not certified in time, though the report was filed before the deadline. As a result, that report was certified in January 2025, which is more than 60 days after submission.

**PART 10. ENFORCEMENT OF STANDARDS OF CONDUCT AND CRIMINAL AND CIVIL STATUTES**

**Table 56: Q49. Did your agency notify OGE of all referral(s) and disposition(s) of the referral(s) via OGE Form 202 (as required by 5 C.F.R. § 2638.206(a))?**

*None*

**Table 57: ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds.**

QUESTION 46: DeCA GC worked with a new team in DeCA Human Resources (HR) to assess the compiling and reporting of disciplinary actions taken as a result of violations of the ethics regulations. DeCA GC will continue to work with DeCA HR to narrow down the data on specifics for the coming year.
Question 47 & 48: A case was referred to DOJ but was done so by DoD OIG's office. DIA Ethics program participated in the process. DoD OIG submitted an OGE Form 202 outlining the referral to DOJ. DIA Ethics submitted a separate OGE Form 202 as well.
Q 46 - DoD has a number of personnel employed in retail clerk type positions and the vast majority of violations pertain to those positions.
Filer was referred to DOJ for failure to file a termination report. DOJ requested additional information. While the information was being gathered, the filer filed the report and VA's referral was withdrawn.
For questions 46 and 47, the Commission took disciplinary action in 2 cases total. One case had a violation under both Q46 and Q47.
Regarding question number 46, there were 5 total violations however, one employee received a violation for both Subpart G and Subpart H.

**PART 11. ETHICS PLEDGE ASSESSMENT (Executive Order 13989 (“Ethics Pledge”))**

**Table 58: Q.51 For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2024, and indicate the number who did and did not sign the Ethics Pledge.**

Employee who onboarded on or about July 2024 was unresponsive to request to file the ethics pledge.
Administrative oversight. Employee departed agency before discrepancy was caught.
Appointee on-boarded mid-December 2024 and ethics paperwork was in the process of being collected. However, Executive Order 14148, dated January 20, 2025, "Initial Rescissions of Harmful Executive Orders and Actions," revoked the ethics pledge in Executive Order 13989 dated January 20, 2021.
One very junior political appointee joined OMB as a Schedule C and departed within 30 days without signing an Ethics Pledge.
The ethics office inadvertently failed to follow up with the employee to sign the pledge. However, when we attempted to rectify our error, the executive order was revoked by President Trump, negating the issue.

**Table 59: Q.51 For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2024, and indicate the number who did and did not sign the Ethics Pledge.**

*None*

**Table 60: Q.51 For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2024, and indicate the number who did and did not sign the Ethics Pledge.**

*None*

**Table 61: Q.52 Registered Lobbyist/and or Registered under the Foreign Agents Registration Act**

*None*

**Table 62: Q.53 Section 3 of Executive Order 13989 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted to appointees in your agency in 2024, the names of those individuals granted waivers in 2024, and which of the Pledge paragraphs were implicated.**

*None*

**Table 63: ADDITIONAL COMMENTS FOR PART 11. Please indicate the question number to which the comment corresponds.**

Questions 36 & 51: Q36 shows 4 new entrant public financial disclosures filed for Schedule C Q51 shows 5 ethics pledges filed for Schedule C There were a total of 5 newly appointed Schedule C employees, but only 4 were required to file a new entrant OGE 278e report. One of the Schedule C's came to us from a prior federal position where she had filed a 278e. She was therefore not required to do a new entrant 278e report. (5 CFR 2634.201(b)(2)(i))

Q52 - OSD had over 150 political appointees. Neither the Ethics Pledge Form nor the OGE 278 provided a location for this specific information to be disclosed. HR required all political appointees to sign the Ethics Pledge Form provided by OGE and the White House. While that Pledge form did not elicit disclosure of prior lobbying or FARA registration status, individual guidance was provided to appointees based upon information concerning prior employment and compensation contained in the OGE 278. Additionally , Ethics Pledge restrictions were addressed during interactive training sessions provided to new political appointees.

## PART 12. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

**Table 64: Q.57 Initial Ethics Training**

scheduling
Several SGEs resigned their positions prior to the first meeting and were not required to receive training. The SGEs who have not received IET did not respond to repeated requests to attend training.
Due to turnover of personnel, the IET dates could not be verified. SGEs will be given IET at the next available opportunity.
Primary reasons reported were staff shortages and turnover.
appointed after first meeting
SGEs who did not complete training were not allowed to participate in meetings or perform other work for the government.
One individual WAS out the country and the other had scheduling conflicts.
Huntsman (FAPB) has not complied with the IET this board was set to terminate and was asked to submit IET due to S wanting a final call/meeting to give thanks to members for their service.
Due to the demands of other assigned duties, some SGEs from the FACAs were inadvertently overlooked for the requirement for some SGEs to undergo ethics training. Moving forward, DFO's will take steps to ensure that training requirements are met and properly prioritized alongside their other responsibilities.
In one instance, the SGE completed training after the first meeting because of confusion about whether the individual would participate in that meeting or not. In the end, the individual participated by submitting written comments in the meeting, so was immediately notified to complete IET.
There are two new SGE members who have IET but have not attended a meeting.
One SGE never attended a meeting.
Change in leadership just before the meeting all caught up now.
The ethics program was not made aware of several appointments, and was thus not able to timely provide initial ethics training.
training provided annually
One SGE resigned from Board duties in September 2024 and did not attend the first meeting of the Board calendar. Two SGEs did not attend the first meeting of the year, held in August 2024. However, one received ethics training after the first meeting which was prior to their first meeting with the BOR later that year. The other SGE who missed the August 2024 meeting had received an ethics refresher in February 2024 and will receive an additional ethics refresher on February 3, 2025.

**Table 65: Q.58 Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2024, and the number of reports actually filed by December 31, 2024.**

<p>One of the board members has been suffering from life-threatening health conditions since early in the year and has not been active since then. The other board member just filed her financial disclosure last month (January).</p>
<p>One SGE OGE-450 filer, whose report was due in December of 2024, was granted an extension to January of 2025.</p>
<p>Despite repeated filing notices and follow ups from Office of Ethics leadership, some SGEs failed to complete their OGE 450 reports as required.</p>
<p>a) Despite repeated requests, a few SGEs who are confidential filers remained non-compliant with the filing requirement. These SGEs were prohibited from participating as SGEs until they complied. Three of these individuals are no longer SGEs due to the change in administration, and the remainder have not been renewed until they comply. b) The SGEs who are public filers are reservists and did not serve on a board, commission, or committee.</p>
<p>1 FACA advisory SGE did not comply 1 Board member did not comply</p>
<p>SGEs who did not submit financial disclosures were not permitted to perform any work for the government.</p>
<p>One member refused to file.</p>
<p>A. PD, CPAC, ISAB, FAPB, BOV* C. Other SGEs (do not include UNGA) D. Fulbrights F. UNGA non-expert/consultants *new board See above filer was asked on several occasions to comply with this submission.</p>
<p>Please note that one SGE filed an OGE 450 report but did not provide services on a FACA committee in CY 2024, and another SGE did not file their report prior to the termination of their service in March 2024.</p>
<p>SGEs on the FACAs identified as filers did not have access to FDM.mil, due to their lack of government email addresses and PIV card. This oversight was not intentional, and steps are being taken to make sure that all SGEs are properly addressed moving forward. The implementation of FDOonline for all SGEs should prevent this from occurring in the future, as that FDOonline provides an electronic system of records and tracking that does not require a government PIV card, and will eliminate the need for paper filing of confidential reports.</p>
<p>One SGE retired and did not file the required confidential report prior to retirement.</p>
<p>One FAC SGE report was unassigned in 2024 due to a programmatic oversight. We have increased our review of SGE assignments to ensure we prevent such oversights in the future.</p>
<p>Per instructions from OGE, we vary the timing of reports to coincide with scheduling Committee meetings. In CY 2024, we did not hold a meeting. However, it was not apparent that this would be the case until December, when we asked SGEs to file anyway. By the end of the year, only a small number of reports had been filed. We are still in the process of collecting them.</p>
<p>At one NASA location, the appointments of a number of SGEs were extended and it appears that the extensions were not captured in EPTS to maintain their filing status.</p>

Despite repeated follow ups, one confidential filing was not submitted during the year.
One Advisory Committee member did not file but has not participated in meetings since failing to file.
The numbers above are percentages. Actual numbers are made available to cleared OGE personnel when required. Identification of new advisory board members was noted as an issue after an evaluation of the advisory committee process was completed by the Assistant GC for Ethics in mid-2024. Process improvements were put in place to improve identification of advisory board members and collection of financial disclosure forms.
Some of the SGEs departed the agency prior to the Feb 15, 2024 deadline.
Multiple people where in the roll during the calendar year, so there are more filings than positions.
One Member was appointed in November 2024. We've given him an extension to file his new entrant report. He will file a new entrant / annual report covering 2024 in February 2025.

**Table 66: Q.59 Note the number of SGE disclosure reports certified or otherwise closed by your agency during the calendar year. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605, section 4.02 of the Public Financial Disclosure Guide, and the Certification Requirements section of the Confidential Financial Disclosure Guide.**

Commission ethics personnel were training a new member of our staff on reviewing and certifying public financial disclosure reports and we took additional time past the 60 days to train the new staff member who is new to ethics law and financial disclosures.
At current staffing levels, each financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly nine hundred (900) OGE-450 reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This very large report volume combined with a very large client population (5,000 employees per advisor) makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics is one of the least resourced Ethics Offices of any Executive Branch Department. Handling ethics programmatic duties for SGEs who serve on a part-time basis is extremely labor-intensive and, to be done correctly, requires resources that USDA OE does not possess.
In some cases, delay of review of an assigned report beyond 60 days was due to staffing changes at the ethics office in other cases, it is also partially due to prioritization for review of pre-existing backlog of older reports.
Public filers - ethics officials were waiting for additional information from filers.

The primary reasons cited were staffing issues, requests for additional information, and technical issues. New procedures have been implemented to ensure reviews will be conducted within 60 days.
Six reports were delayed in review because the FACA board was new and there was a question as to whether individuals would be SGE members or representatives.
staffing shortages, seeking additional information from filers, preparing waivers
Employee new to the FDonline system did not realize report was in their queue.
Legacy paper filing (including the reports being sent through the mail system) led to delays in transmission of reports.
Timeliness of intermediate review by a committee designated federal official implicated some reports. After action revealed staffing shortages and process issues related to features with the agency's automated tracking system, both of which are being addressed.
Change in ethics personnel.
The numbers reported above in 57, 58, and 59 are percentages. Actual numbers are made available to cleared OGE personnel when required. Although the agency increased resources from the prior year for financial disclosure reviews, the agency still requires additional resources in order to ensure all forms can be reviewed within the 6-day time period. Some forms were held for review by the supervisor for much or all of the 60-day review period, which the agency believes will improve in 2025 due to DoD's requirement for supervisors to review within 14 calendar days of receipt.
Some reports from CY2023 had late initial reviews, which were completed during CY 2024. Ethics team discussions on methods to improve review and certification times were held early 2024. We have added additional program checks to ensure initial reviews are completed within 60 days and have updated ethics staff elements and standards to include detailed metrics tied to the quantity, quality, and timing of reviews. All forms submitted in 2024 had initial review completions within 60 days.
Greater than expected arrivals and departures, together with excessive workload during report review season delayed some reviews beyond 60 days.
Delay in review by certifying official

**Table 67: Q.59 Note the number of SGE disclosure reports certified or otherwise closed by your agency during the calendar year. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. "Initially reviewed within 60 days" means having completed a technical review and conflicts analysis. See 5 C.F.R. § 2634.605, section 4.02 of the Public Financial Disclosure Guide, and the Certification Requirements section of the Confidential Financial Disclosure Guide.**

All SGE 450s were reviewed within 60 days of receipt. However, due to an oversight they were not certified within the time frame. They were certified the following month.
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Commission ethics personnel were training a new member of our staff on reviewing and certifying public financial disclosure reports. Of our 8 SGE's, 5 were certified within 60 days, 2 were certified within 65 days, and only 1 was certified outside of 60 days after being erroneously certified and then sent back for filer supplement.
None were late.
See above
Shortage of reviewers.
Legacy paper filing (including the reports being sent through the mail system) led to delays in transmission of reports.
Although ethics officials conducted initial reviews timely, EPA identified a few reports for one FACA that were not certified within the required time frame. That committee works only on "matters", not specific party matters nor matters of general applicability, so the belated certification of those forms did not result in any conflicts concerns. The error was due to DEO turnover and has now been rectified through education and process improvement.
Timeliness of intermediate review by a committee designated federal official implicated some reports. After action revealed staffing shortages and process issues related to features with the agency's automated tracking system, both of which are being addressed.
Given the small size of the agency and the transition of the DAEO without overlap during mid-year, the certification delays were purely an administrative oversight. This was identified by the OGE inspection and NCPD is working to remedy this moving forward.
See explanation above for more information.
SGE did not complete financial disclosure upon requests from OGC and took time to respond or departed agency without filing a financial disclosure report although filing had been requested.
Delay in review by certifying official
All were reviewed and approved for certification but we moved to a new location and had numerous technical issues with accessing power, then internet, etc.

**Table 68 ADDITIONAL COMMENTS FOR PART 12. Please indicate the question number to which the comment corresponds.**

Q58-61: ACUS SGEs are not required to file any type of annual financial disclosure form due to the very remote chance of conflicts of interest, and because all ACUS members (i.e., SGEs and RGEs) have an affirmative obligation under ACUS's bylaws to report conflicts to the agency head any time they arise.
Qs 57 & 58: The Bureau's SGE advisory committee member who filed a 450 in 2024 participated in her first meeting on December 1, 2023 but did not file her 450 until the first week of January 2024. The committee did not meet again prior to the member filing her 450. That member received initial ethics training at that December 1, 2023 meeting.
DCAA has no Special Government Employees.

<p>Q60 - Most excluded SGEs are serving on boards that advise on internal personnel matters, such as sexual assault prevention and military family/personnel issues or are providing part time skilled services such as teaching or language interpretation.</p>
<p>Q60: Exempt SGEs are primarily employed through the National Disaster Medical System (NDMS) to respond to major disasters or provide per diem nursing services at the NIH Clinical Center. Others are FDA SGEs who did not serve on any FACA committees in 2024 and were thus not required to file.</p>
<p>A majority of VA's FACA committee members did not have VA email addresses and/or PIV cards and, therefore, could not access the Army's Financial Disclosure Management (FDM) system which VA uses to collect and review the OGE 450 forms. The lack of access resulted in delays in collecting and reviewing their OGE 450s. In August 2023, VA signed a contract with Intelliworx for use of FDOonline, a system which can be accessed via username and password. VA has transitioned to this program and the FACA SGE filers have been added into FDOonline for CY25.</p>
<p>59 -- EPA Ethics intends to move SGE filers and reviewers to an electronic filing platform in the near term to minimize technical reporting errors and increase timeliness.</p>
<p>Question 60: All SGEs were student interns during the summer months. The summer interns are subject to substantial supervision, and do not exercise significant judgment regarding agency actions. They also do not occupy positions in a pay band level that would qualify them as financial disclosure filers under agency policy.</p>
<p>The NEA employs a large number of SGEs on FACA committees to fulfil its grantmaking functions. This year, there were 742 SGEs serving on the Arts Advisory Committee (AAC) and 5 SGEs serving on the Federal Advisory Committee for International Exhibitions (FACIE). Each of these SGEs serves one day a year and is not permitted to participate without undergoing IET and completing an OGE-approved 450 alternative form. The National Council on the Arts (NCA) is a FACA committee consisting of PAS SGEs. These SGEs fill out 450s during their nomination, and an OGE-approved alternative form before each formal NCA meeting they attend. This year, there were 18 NCA members and three formal meetings were held. Hence, Q56 and Q57 reflect all 765 SGEs (742+5+18=765), and Q58 and 59 reflect the total number of reports required to be filed by all SGEs (742 AAC + 5 FACIE + 16 NCA (attended first meeting) + 14 NCA (attended second meeting) + 16 NCA (attended third meeting)=793).</p>
<p>#58 - One SGE Advisory Board member required to file new entrant report in 2024. #60 - One SGE Advisory Board member has not started participating and will complete new entrant reports in 2025. Remaining 4 SGE Advisory Board members informed to provide follow-on new entrant reports at upcoming annual meeting in 2025.</p>
<p>Q59. OHR failed to notify OEC that one SGE was reappointed in Oct 2023. When we learned of his reappointment in 2024, we had him file his 450. He was reappointed again in 2024 and thus he filed a second new entrant form in 2024. This is why 4 reports were required but 5 were closed. One form was required in 2023 but not filed until 2024. Q60. The DAEO determined that 2024 student honors interns who were paid employees of the agency, and are therefore considered SGEs, were excluded from the Form 450 reporting requirement under 5 C.F.R. 2634.204(b). The DAEO exercised her authority under 5 C.F.R. 2634.904(b), and made a categorical determination that the student interns' duties raised only a remote</p>

possibility that the interns would be involved in a real or apparent conflict of interest. Moreover, these interns were highly unlikely to have a substantial role in the formulation of agency policy or serve on a Federal Advisory Committee and their work was heavily supervised.

For # 56 and # 57: There are 9 total SGE positions, and at the start of the SGE year one of the nine resigned.

Q57 No SGEs were serving on a board or commission in 2024. All SGEs received Initial Ethics Training.