

# Agency\_\_\_\_\_

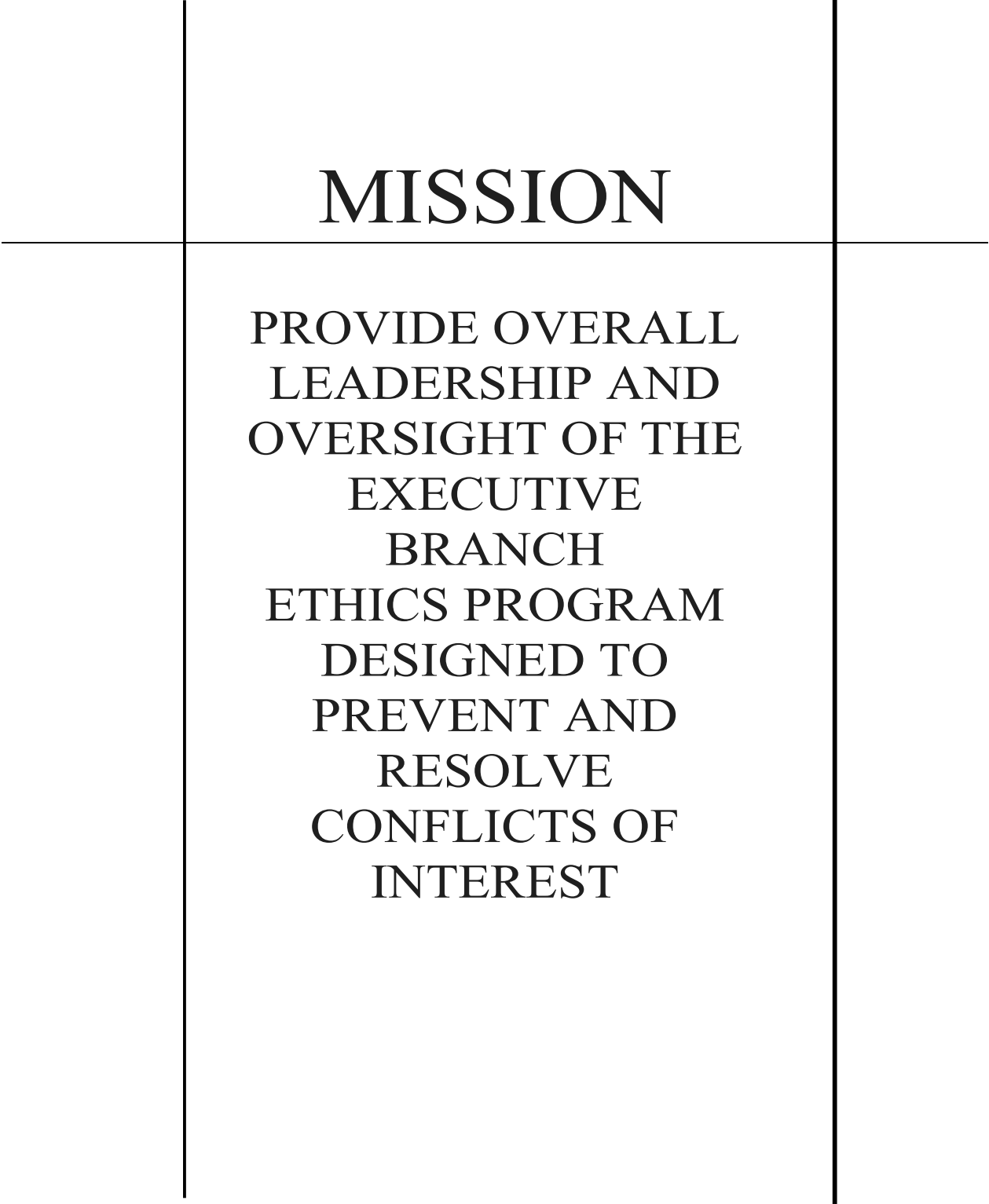
# FINANCIAL REPORT

FISCAL  
YEAR  
2025

UNITED STATES  
OFFICE OF  
GOVERNMENT  
ETHICS



# MISSION



PROVIDE OVERALL  
LEADERSHIP AND  
OVERSIGHT OF THE  
EXECUTIVE  
BRANCH  
ETHICS PROGRAM  
DESIGNED TO  
PREVENT AND  
RESOLVE  
CONFLICTS OF  
INTEREST

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS

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December 18, 2025

The Honorable Russell Vought  
Director  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Dear Director Vought:

I am pleased to transmit to you the Agency Financial Report (AFR) for the U.S. Office of Government Ethics (OGE) for fiscal year 2025. The AFR includes OGE's Management Discussion and Analysis of Results and OGE's Management Assurances and Audited Financial Statements.

OGE management is responsible for establishing and maintaining effective internal controls over financial reporting, safeguarding of assets, and complying with applicable laws and regulations. In accordance with OMB guidance, I have determined to the best of my knowledge and belief that the performance and financial data included in this report are complete and reliable. OGE has received an unmodified opinion on its financial statements as of September 30, 2025, and the auditors found no material weaknesses related to OGE's compliance in internal controls over financial reporting.

If you need additional information with regard to this submission, please contact OGE's Ethics Transparency and *INTEGRITY* Branch Acting Chief Elizabeth Horton at 202-482-9211.

Sincerely,

Shelley K. Finlayson  
Chief of Staff and Chief Counsel

Attachment



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## Part I – Management’s Discussion and Analysis

This section provides a brief description of the U.S. Office of Government Ethics’ (OGE) mission and organizational structure, a high-level discussion of OGE’s key performance goals, and an analysis of OGE’s financial statements and stewardship.<sup>1</sup>

### **Mission Statement and Background**

OGE was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.

Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 140 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

#### *OGE and Executive Branch Agencies: A Shared Responsibility*

The head of each executive branch agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.



The head of each agency is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE.

<sup>1</sup> OGE has chosen to produce an Agency Financial Report (AFR) and Annual Performance Report (APR) in lieu of a Performance and Accountability Report. OGE will provide more detailed information regarding its performance goals and results in its fiscal year 2025 APR.

Each agency's employees, including supervisors, human capital officials, and the agency's Inspector General, play a significant role in maintaining the integrity of government programs and operations.

Further, OGE, and the ethics officials across the government, are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

### *Office of Government Ethics: A Small but Agile Agency*

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE's greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five- year term by the President after confirmation by the Senate. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE's career Chief of Staff and senior leadership, who work in concert to carry out OGE's mission.



### **Performance Highlights**

The public can have greater confidence in the integrity of executive branch programs and operations when government decisions are made free from conflicts of interest. OGE's four strategic goals for fiscal years 2022 through 2026 reflect the long- term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest.

The daily work of OGE is driven by the strategic objectives and performance goals established under each of the overall strategic goals set forth below. In fiscal year 2025, OGE met or exceeded all of its performance goals.<sup>2</sup>

Below are performance highlights from each of OGE's major programs that support OGE's strategic goals.

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<sup>2</sup> OGE's performance goals are based on statistical data from a variety of existing sources, including post- training evaluations, an annual agency ethics program questionnaire, and the Annual Survey of Ethics Officials.

## ***Ethical Leaders and Ethical Leadership***

*Election Readiness:* In fiscal year 2025, OGE carried out its statutory role in preparing for and supporting Presidential transitions, including by providing briefings and training to Presidential campaigns on government ethics and *INTEGRITY*; actively participating in the Agency Transition Directors Council; concluding the year-long Summit on Election Readiness; and issuing four advisories related to election readiness topics. OGE also complied with succession planning and other requirements of the Presidential Transition Act.

*Nominee Financial Disclosure:* OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process. In fiscal year 2025, OGE worked with agencies and filers to identify and resolve potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. In addition, OGE worked with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act. OGE reviewed 467 reports, which represent approximately forty-two percent (42%) of all PAS positions. Further, OGE cleared ninety-three percent (93%) of the nominee reports it received in fiscal year 2025.

*Ethical Leadership:* Ethical culture begins with ethical leadership throughout an organization, from the top down. OGE engaged agency leaders on the importance of ethics and sensitized federal managers to ethics issues. In fiscal year 2025, OGE's Leadership sent a welcome letter discussing these important responsibilities to each of the incoming Presidential appointees as they were confirmed by the Senate. Within each letter, OGE's Leadership encouraged new leaders to remain "fully committed to our singular duty: to serve the public," and urged them to regularly remind their teams of this duty, to reiterate that each department and agency has dedicated and well-supported ethics officials to help with the tough issues, and to always consider their own oaths as they carry out their important duties.

*Resolving Conflicts of Interest:* OGE continued working to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office. OGE does this by identifying and resolving potential conflicts of interest on the part of PAS nominees and by establishing written ethics agreements with them prior to confirmation. OGE then monitors PAS ethics agreement compliance through the collection and review of documentation provided by agency ethics officials. Certification of Ethics Agreement Compliance reports require appointees to attest to their ethics agreement compliance. OGE continued the practice of posting these certifications on its website. In fiscal year 2025, 99 PAS appointees were required to certify that they had complied with their ethics agreements. OGE received certifications from 99 and 98 (99%) were submitted timely.

*Certificates of Divestiture:* agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain employees may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. In fiscal year 2025, OGE reviewed 192 requests for CDs and made those available electronically through the Request an Individual's Ethics Document (OGE Form 201) process.

*INTEGRITY:* OGE worked to ensure that [\*INTEGRITY\*](#) continued to reliably and securely operate for the high volume of nominees using the system and the tens of thousands of current filers and reviewers who rely on the web-based system every year at no cost. As with every year, OGE underwent and successfully completed an independent security review of the system, which found the system to be secure. In addition, OGE continued to convene regular *INTEGRITY* Advisory Council meetings to provide a forum for agencies to discuss and prioritize upgrades to the system.

*Annual Financial Disclosure:* OGE also helps ensure that senior officials remain free from conflicts of interest by timely reviewing the public new entrant, annual, termination, and transaction financial disclosure reports of executive branch leaders appointed by the President and confirmed by the Senate (PAS), as well as other reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. In fiscal year 2025, OGE reviewed 558 termination reports and 32 new entrant reports in addition to 392 annual and 674 periodic transaction reports plus 25 annual/term combined reports. Of these, OGE closed ninety-eight percent (98%) of its reviews of public financial disclosure reports within 60 days of receipt.

OGE continued to provide high-quality support for users and agencies to the system's more than 38,000 users (filers, administrators, and reviewers) by providing outstanding Help Desk services, training resources and tutorials, and regular training opportunities for both new and experienced users through monthly webinars. Finally, OGE engaged in outreach to the user agency community by administering an annual User Support Survey, which allows agency *INTEGRITY* administrators to provide feedback on *INTEGRITY* assistance, resources, and training, and which this fiscal year indicated a ninety-four percent (94%) satisfaction rate.

### ***Strong, Consistent Executive Branchwide Program***

*Desk Officer Support:* OGE provides necessary support to agency ethics officials so that they can provide uniform and effective ethics guidance to nearly 3 million federal employees in the executive branch who serve the American people. OGE provides timely, expert advice on applying ethics laws and regulations, and disseminates up-to-date ethics information that ethics practitioners need to do their jobs effectively. OGE's Desk Officers assist agencies in resolving difficult ethics issues requiring expertise that only the supervising ethics office can provide. In fiscal year 2025, OGE Desk Officers and attorneys responded to approximately 800 requests for assistance from agencies. Desk Officers also proactively engaged with agency ethics offices through meetings to provide expertise and support, and to raise awareness of the range and availability of OGE's services. On several occasions, ninety-two percent (92%) of survey respondents indicated that Desk Officers helped them to perform their job duties.



*Training:* OGE provided ethics training to ethics officials across the executive branch, which is essential to ensuring consistency in the application of ethics laws and policy. In fiscal year 2025, OGE provided orientation sessions to new ethics officials to introduce them to their roles and responsibilities as ethics program leaders and advocates. Nearly 90 senior officials registered to participate in these orientation sessions.

In addition, in fiscal year 2025, OGE continued to offer a wide array of additional educational offerings to ensure that ethics officials had access to the expertise and tools needed to do their jobs. OGE offered: the Accelerated Certification in Ethics (ACE), Skill Builders on Advice and Counsel, as well as workshops, demos, interactive training, Quickstart guides and lectures. Ethics officials could work toward earning their Annual Professional Ethics Practitioner (PEP) Certificate by attending these offerings. The PEP certificate is designed for ethics officials who are performing some or all functions of an ethics program at full competency and who wish to maintain their skills and stay current with policy changes and developing practices in the ethics profession. By offering an annual certificate, OGE signals an expectation of ongoing professional development by ethics officials.

OGE also launched an updated version of its Institute for Ethics in Government webpages. This included a redesign of the virtual training [library](#) of more than a 100 educational resources designed for use by ethics officials, such as recordings of training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity. The update to the library included improved search filter/capabilities. Additional webpages were added to support new ethics officials and ethics program leaders.

In fiscal year 2025, OGE also continued to create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies. For example, OGE offered its mentorship program for the second year in a row to ethics officials who participated as mentees and mentors. OGE also continued its monthly “flash networking” series to provide ethics officials with an opportunity to build their professional networks.

*Ethics guidance:* In fiscal year 2025, OGE issued seven legal advisories and eight program advisories. The legal advisories provided guidance on timely ethics issues, such as [gifts between employees in times of crisis](#) and [ethical requirements relevant for executive branch employees during a presidential Inauguration](#). The program advisories covered topics such as the [Revised Compilation of Federal Ethics Laws](#) and the [deadlines and procedures for annual public financial disclosures for the 2025 filing cycle](#).

## *Oversight and Accountability*

*Program Reviews:* Through agency ethics program reviews – such as plenary, inspection, and follow-up reviews – OGE ensures consistent and sustainable agency ethics program compliance with established executive branch ethics laws, regulations, and policies, and provides recommendations for meaningful program improvement. Program reviews include an examination of agency ethics program materials, such as financial disclosure reports, documentation of ethics advice provided to employees, training records, and ethics agreement compliance tracking.

In fiscal year 2025, OGE conducted 45 program reviews and 49 follow-up reviews. Reports on each of these 94 reviews were published and posted on OGE's [website](#). In fiscal year 2025, OGE's ethics program reviews resulted in 67 recommendations addressing specific ethics program deficiencies. During the fiscal year, OGE closed 203 recommendations. Notably, OGE converted static dashboards that displayed information about the number of recommendations open and were posted each quarter to dynamic dashboards that update each week.

*Annual Questionnaire:* OGE assesses agency ethics program compliance through the Annual Agency Ethics Program Questionnaire (Annual Questionnaire). In fiscal year 2025, OGE attained 100% compliance from the more than 140 agencies required to submit their data. Agency responses to the Annual Questionnaire give OGE a snapshot view of each agency's ethics program and ensure that each agency does a year-end assessment of its own ethics program. In fiscal year 2025, OGE continued to share key highlights from its Annual Questionnaire with ethics officials and the public by posting on its website a report summarizing highlights and trends ascertained from collected data, as well as each agency's responses to the Annual Questionnaire. This allows the public to have insight into individual agency ethics programs and allows agencies to share model practices.

*Enforcement Activities:* Accountability of the executive branch ethics program also includes monitoring enforcement activities conducted by other agencies. Agencies are required to concurrently notify OGE's Director when any matter involving a potential violation by an executive branch employee of 18 U.S.C. §§ 202-209 is referred for investigation or prosecution to the Department of Justice. Agencies use OGE Form 202 (Notification of Conflict of Interest Referral) to submit these notifications and information regarding the disposition of the matter. OGE tracks and follows up on conflicts of interest referrals to the Department of Justice to ensure that agencies are considering disciplinary or other corrective action in the event of declinations of prosecution. In fiscal year 2025, OGE innovated by converting static dashboards that displayed information about the number of referrals submitted to OGE and were posted each quarter to dynamic dashboards that update each week.

*Conducted Inquiries:* OGE continued to conduct real-time inquiries and reviews in response to data, news, or external sources that suggested that an agency ethics program may be out of compliance. In fiscal year 2025, OGE conducted approximately 10 inquiries. In fiscal year 2025, OGE used its formalized written procedures to establish when OGE conducts such inquiries and reviews to improve consistency.

## *Transparency*

*Open Government:* There are a number of external demands for information from OGE, reflecting increased public interest in OGE's work. In fiscal year 2025, OGE processed 14,000 requests from the public and the news media to inspect more than 24,000 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, and other covered records.

*Congressional Affairs:* In addition to assisting executive branch ethics officials, OGE responded to requests for assistance from other key stakeholders, including Congress. OGE serves as the legislative liaison on behalf of the entire executive branch ethics program. OGE works to build congressional understanding of the executive branch ethics program and to inform congressional oversight and revisions to ethics laws. Notably, in fiscal year 2025, OGE provided 42 consultations in response to requests for technical assistance on draft legislation and a wide variety of executive branch ethics issues. During the fiscal year, OGE also tracked 97 bills of relevance to the executive branch ethics program introduced in the 119th Congress.

*FOIA:* The Freedom of Information Act (FOIA) is critical in helping to ensure transparency in government by providing the public with access to important documents. OGE demonstrates its commitment to a responsive FOIA program by maintaining an effective system for responding to FOIA requests, increasing proactive disclosures, using technology to more effectively communicate with requestors, tracking requests and managing FOIA program records, improving timeliness in responding to requests, and applying a presumption of openness in responding to requests. In fiscal year 2025, OGE received a high volume of FOIA requests (208) and responded to 224 requests. The number of requests represents an 26% increase over the prior year. OGE received positive scoring from DOJ on its annual reporting.

*Maintained and refined OGE's website:* OGE's website is the agency's main communication tool and the most valuable resource for OGE's stakeholders, including agency ethics officials, the media, and the general public. OGE continued to maintain and refine its website in conformance with the 21st Century Integrated Digital Experience Act. In fiscal year 2025, OGE's webpages saw 1.45 million pageviews by over 410,000 people. OGE created a new public participation opportunities webpage to help the public know when and how they can provide feedback to OGE.

*Timely Responded to External Requests for Information and Assistance:* In fiscal year 2025, OGE responded to approximately 315 requests for assistance from the press to support more accurate reporting about the ethics laws and regulations and OGE's work. These interactions multiplied OGE's ability to reach the public to promote further understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also received requests for assistance from other stakeholders, including more than 355 requests from private citizens. This engagement promoted understanding of the executive branch ethics program and related ethics laws and regulations.

*Supported U.S. International Anti-Corruption Efforts:* OGE continued providing support to the international community at the request of the State Department. In fiscal year 2025, OGE

briefed five foreign delegations representing 20 countries.

### ***Stewardship of Agency Responses***

*Increased efficiency by leveraging secure information technology:* In fiscal year 2025, OGE worked to eliminate waste and increase efficiency by leveraging secure information technology, including by automating agencywide FOIA searches and records management, increasing automated fulfillment of public requests for ethics documents, maintaining dozens of in-house program applications, publishing [OGE's Open Data Plan](#) and [OGE's Information Resource Management Plan](#), maintaining a secure IT infrastructure, and mitigating risk, as evidenced by earning a “managed & measurable” rating on its independent FISMA CIO assessment.

In fiscal year 2025, OGE maintained its network on a secure, FedRAMP-certified government cloud environment, which simplifies compliance with National Institute of Standards and Technology guidelines, and simplifies network disaster recovery. OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal year 2025, OGE continued to devote resources to applications that support major mission programs, such as the Desk Officer program, the Annual Questionnaire, the Records Program, and financial disclosure tracking, as well as those applications that support internal operations, such as requisition processing, budget formulation, and equipment tracking. These custom applications allow OGE to accomplish its mission with limited staff and help the agency to make data-driven decisions.

*Strengthen OGE's cybersecurity:* In accordance with the Federal Information Security Modernization Act (FISMA), OGE's security program continued to review weekly network perimeter scans performed by the Department of Homeland Security; procure and undergo annual security assessment reviews conducted by accredited independent auditors using FISMA CIO and FISMA IG metrics; provide mandatory annual cybersecurity awareness training (general and role-based); and prepare for *INTEGRITY's* annual security assessment. OGE participates in the Continuous Diagnostics & Mitigation (CDM) Program, which provides capabilities and tools to identify cybersecurity risks on an ongoing basis, prioritizes risks based on potential impacts, and enables cybersecurity personnel to mitigate the most significant problems first. In fiscal year 2025, OGE also took steps to comply with Executive Order 14028 on Improving the Nation's Cybersecurity and subsequent Executive Orders and guidance (e.g., Executive Order 14306: Sustaining Select Efforts to Strengthen the Nation's Cybersecurity and Amending Executive Order 13694 and Executive Order 14144, OMB Memos M-21-30, M-21-31, M-22-01, M-22-05, M-22-09, etc.). This work is critical to protect the confidentiality, integrity, and availability of OGE's information and information systems against unauthorized access and use.

*Remain strong fiscal stewards:* OGE continued to be an excellent steward of the fiscal resources entrusted to it. OGE demonstrated its commitment to effectively and efficiently manage funds appropriated by Congress to execute OGE mission goals, including through maximizing its use of 23 shared services and interagency agreements. Not only does OGE continually seek full value from each taxpayer dollar, it does so while implementing strong fiscal controls. Notably, in fiscal year 2025, OGE maintained an unmodified opinion on its financial statements and an

independent financial audit found no material internal control weaknesses. To reduce fiscal risk and ensure that OGE remains fiscally responsible, OGE continued to use a custom internal application, which builds in additional internal controls and tracking, to maintain its effective process for approving requisitions. OGE also continued to maintain strong internal controls regarding its inventory of IT equipment and other assets. Similarly, in fiscal year 2025, OGE maintained custom applications to strengthen its budget formulation and performance award approval processes. Lastly, OGE increased spending transparency for the American public by posting contracting information to OGE's website.

*Advance data governance:* OGE continued to ensure the agency's compliance with the Foundations for Evidence-Based Policymaking Act, to convene monthly meetings of its Data Governance Board, and to actively participate in the Chief Data Officers Council. OGE also published its Open Data Government Plan.

*Safeguard privacy:* In fiscal year 2025, OGE continued to safeguard privacy by maintaining critical executive branch wide systems of records related to the ethics program, including *INTEGRITY*, as well as the agency's internal records. OGE's privacy program worked to ensure that the agency complies with the requirements of the Privacy Act, the E-Government Act, and the executive branch privacy program requirements, as established by OMB. During fiscal year 2025, OGE reviewed 29 Privacy Threshold Analyses and drafted or revised 7 new Privacy Impact Analyses. OGE also conducted privacy training and role-based privacy training for those required to receive it, including agency employees and supervisors, and government contractors who perform services for the agency.

*Enhance its records management program:* OGE continued to enhance its Records Management Program, in order to ensure agency records are available to the public and OGE staff, and to comply with records management requirements. In fiscal year 2025, this work included: developing and updating records management policies and procedures; developing and conducting training; onboarding new employees; working with the National Archives and Records Administration (NARA) on OGE mission-specific disposition authorities; issuing records management guidance; conducting inventories of agency records systems and repositories; updating records file plans; and providing records management training to all employees. Notably, OGE timely submitted three program assessments to NARA and received high scores on each report. As a result of these reviews, NARA assessed OGE's records program in the "low risk category."

*Accountability and Performance:* In fiscal year 2025, OGE continued to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; reviewing the Employee Viewpoint Survey results; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

*Developed OGE's workforce:* OGE continually focuses on developing the knowledge, skills, and abilities of its employees through personalized formal and informal professional development opportunities. In fiscal year 2025, OGE employees participated in the OGE

Employee Development Plan (EDP) program. Through the EDP process, employees, in collaboration with their supervisors, identify specific formal training, mentoring, self-study, and/or on-the-job training activities that they will complete in the covered period. Employees have the opportunity to lead significant projects, as well as participate in cross-functional teams and training. Notably, the EDP identifies objective measures for assessing the employee's acquisition of the targeted knowledge or skills.

## **Conclusion**

The above performance highlights demonstrate that through targeted strategies and careful tasking of its small, cross-functional staff, OGE has been largely successful in achieving its strategic goals and accomplishing its mission. As noted at the beginning of the Management's Discussion and Analysis section, OGE will provide more detailed information regarding its performance goals and results in its fiscal year 2025 Annual Performance Report (APR).

## **MD&A Analysis of Financial Statements and Stewardship Information**

In fiscal year 2025, OGE maintained an unmodified opinion on its financial statements and no material internal control weaknesses were found. OGE is committed to effectively and efficiently managing funds appropriated by Congress to incur obligations for goods and services necessary to execute OGE mission goals. OGE responsibly maintained its fiscal year 2025 budget request by stabilizing its budget at \$23,037,000, with no increase from fiscal year 2024, demonstrating excellent financial stewardship of financial resources. OGE was able to maintain operations at sufficient levels and ensure OGE's important missions were accomplished.

As potential security threats against automated systems grow and become more complex, OGE is proactively ensuring that any threats are reduced and mitigated, if not eliminated, effectively providing for the security and efficiency of OGE's ongoing daily operations – in particular, a safe and secure technical environment that protects the privacy and integrity of the financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch.

OGE continues to improve its public website, which is OGE's main communication tool and the most valuable resource for OGE's stakeholders, including agency officials, the media, and the general public.

## **Part II - Management Assurances**

### **MD&A Analysis of Systems, Controls, and Legal Compliance**

#### **Annual Assurance Statement on Internal Controls and Internal Controls over Financial Reporting**

OGE's management is responsible for establishing and maintaining effective internal controls and financial management systems that meet the objectives of the Federal Manager's Financial Integrity Act (FMFIA). OGE conducted its assessment of the effectiveness of OGE's internal control over financial reporting and compliance with applicable laws and regulations in accordance with OMB Circular A-123, Management's Responsibility for Internal Control. After a thorough review of the results, and to the best of my knowledge and belief, OGE can provide reasonable assurance that its internal controls over the effectiveness and efficiency of operations were in compliance with applicable laws and regulations as of June 30, 2025. No material weaknesses were found in the design or operations of the internal controls over financial reporting.

OGE relies on the U.S. Department of Treasury, Bureau of Fiscal Service (BFS), a financial management shared service provider, for its accounting and financial systems and to meet its financial reporting requirements. OGE has no in-house financial systems but rather uses systems hosted/provided by BFS. OGE uses Oracle Financials which we consider to be a reliable and effective financial system. OGE obtains the Statement on Standards for Attestation Engagements (SSAE) 18 Service Organization Control (SOC) audits and Bridge Letters from BFS and reviews the statement to assist in assessing internal controls over OGE's financial reporting. After a thorough review of the results, OGE has not discovered any significant issues or deviations in its financial reporting during fiscal year 2025. Therefore, OGE concludes that the internal controls over financial reporting are sufficiently strong.

**SHELLEY  
FINLAYSON**

Shelley K. Finlayson  
Chief of Staff and Chief Counsel  
U.S. Office of Government Ethics

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## Forward-Looking Information

Numerous external factors shape OGE's operating environment. Understanding their influence is essential for mitigating risk and achieving performance goals. These external factors could cause OGE to incur costs, impede its mission, or necessitate reallocating staff resources.

- *IT Threats:* As security threats against systems grow and become more complex, OGE remains proactive to ensure that any threats are reduced and mitigated, if not eliminated. OGE has taken several steps to secure its IT systems, including undergoing independent, third-party assessments; penetration testing of the network and *INTEGRITY*, complying with key government-wide directives; and leveraging both internal and external expertise and resources. OGE continues to address IT security threats and will commit significant resources to secure its important IT systems and network. OGE will also seek, despite its small staff and limited resources, to remain responsive and compliant with new cybersecurity directives. OGE completed a comprehensive replacement of its IT infrastructure in 2024 by procuring new equipment and by migrating to a secure, FedRAMP-certified government cloud environment ensuring a proactive approach to IT security threats.
- *Expert Personnel:* Over the past fiscal year, a number of OGE's expert personnel have retired or left the agency and OGE has been unable to replace these positions due to hiring restrictions. This is a significant challenge, since OGE must have experts available to monitor senior leaders' compliance with their ethics requirements, answer complex questions, provide written guidance, train ethics officials, review agency ethics programs for compliance, modernize ethics rules, provide support to investigators and enforcement partners, and more all while meeting the President's priority initiatives and mandates. Only with the necessary complement of its expert, cross-functional staff working at full capacity can OGE continue to keep pace with its increasing workload and support the needs of the executive branch ethics program. OGE plans to invest in expert personnel through hiring, reimbursable detail agreements, service agreements or a combination of these approaches to address this issue.
- *Shared Service Provider Changes:* OGE has a long history of leveraging shared services to reduce the duplication of services and to consolidate modernized government systems. Specifically, rather than replicate available systems and hire non-mission focused staff, OGE currently makes full use of shared service providers (SSP) for financial management, human resources, travel, and procurement actions that are responsible for the operation, maintenance, modernization and consolidation of applicable systems. As a result, OGE does not duplicate or promulgate unsupportable legacy systems, but as a customer of these SSPs, provides valuable input into the President's consolidation and system modernization efforts. However, OGE was recently informed by the Department of Treasury's Bureau of Fiscal Services (BFS)/Administrative Resources Center (ARC) that in fiscal year 2027 they plan to terminate all of the shared services they provide to non-Treasury customers, except financial management. OGE will seek replacement services, but this and other SSP changes

can significantly impact OGE's operating environment.

- *Future of Work:* OGE is actively evaluating the use of new leased office space given the impact of the Administration's and Congressional efforts to return government employees to in-office work status and significantly reducing tele-work and eliminating remote work. OGE is continually evaluating performance, employee engagement, and staff feedback to enhance workspace needs.
- *INTEGRITY Support Functions and Authentication:* OGE continued to resource *Integrity* on behalf of the entire executive branch ethics program in 2025, effectively maintaining and operating this essential financial disclosure reporting application across the federal executive branch. OGE renewed the IT services support contract for FY2025 through FY2027 maintaining a stable and proven work relationship with an experienced and skilled vendor. Progress is being made as OGE continues to research and evaluate alternative solutions to the system's unique authentication requirements. OGE's ability to continue to secure, operate, enhance, and update the system, with a very small contingent of staff and a small agency budget, and to continue to provide the system to all agencies at no cost may be affected by unforeseen problems and rising costs from other service providers.
- *Potential Legislative Reform:* OGE is the subject of significant and intense congressional and stakeholder interest. OGE is currently tracking more than 75 bills that would make significant statutory revisions to the Ethics in Government Act or the criminal conflict of interest statutes or create entirely new ethics-related statutes. Passage of major ethics reform would present significant challenges for OGE.
- *Workload and Unfunded Mandates:* OGE produces a remarkable amount of work with a small staff by carefully managing the cyclical nature of the agency's work and leveraging its highly cross-functional professional employees. Although agile, significant unanticipated changes in workload have impacts across programs. There are also ongoing and growing compliance requirements that must be addressed with no lead time or new resources to support them, such as unanticipated human resources, privacy, and data-focused executive orders, OMB directives, laws, and regulations.

## **Part III – Financial Statements and Independent Auditor’s Report**

### **Limitations of the Financial Statements**

The financial statements are prepared to report the financial position, financial condition, and results of operations, consistent with the requirements of 31 U.S.C. § 3515(b). The statements are prepared from records of Federal entities in accordance with Federal generally accepted accounting principles (GAAP) and the formats prescribed by OMB. Reports used to monitor and control budgetary resources are prepared from the same records. Users of the statements are advised that the statements are for a component of the U.S. Government.

**OFFICE OF GOVERNMENT ETHICS**  
**FINANCIAL STATEMENTS**  
**FOR THE FISCAL YEAR ENDED SEPTEMBER 30, 2025**

**UNITED STATES OFFICE OF**  
**GOVERNMENT ETHICS**



Preventing Conflicts of Interest  
in the Executive Branch

**UNITED STATES OFFICE OF GOVERNMENT ETHICS**  
**BALANCE SHEET**  
**AS OF SEPTEMBER 30, 2025**  
**(In Dollars)**

	2025
<b>Assets</b>	
Intragovernmental Assets	
Fund Balance with Treasury (Note 2)	\$ 10,216,623
Advances and Prepayments	20,120
Total Intragovernmental Assets	10,236,743
Other than Intragovernmental Assets	
Property, Plant, and Equipment, Net (Note 3)	305,001
Total Other than Intragovernmental Assets	305,001
<b>Total Assets</b>	<b>\$ 10,541,744</b>
<b>Liabilities (Note 4)</b>	
Intragovernmental Liabilities	
Accounts Payable	\$ 803
Accounts Payable	803
Other Liabilities (Note 6)	262,361
Other Liabilities (Without Reciprocals)	40,684
Other Current Liabilities - Benefit Contributions Payable	221,677
Total Intragovernmental Liabilities	263,164
Other than Intragovernmental Liabilities	
Accounts Payable	298,469
Federal Employee Salary, Leave, and Benefits Payable	1,436,727
Pension, Post-Employment, and Veterans Benefits Payable (Note 5)	588,128
Total Other than Intragovernmental Liabilities	2,323,324
<b>Total Liabilities</b>	<b>\$ 2,586,488</b>
<b>Commitments and Contingencies (Note 8)</b>	
<b>Net Position</b>	
Unexpended Appropriations	
Funds from Other than Dedicated Collections	\$ 9,279,147
Total Unexpended Appropriations (Consolidated)	9,279,147
Cumulative Results of Operations	
Funds from Other than Dedicated Collections	(1,323,891)
Total Cumulative Results of Operations (Consolidated)	(1,323,891)
<b>Total Net Position</b>	<b>\$ 7,955,256</b>
<b>Total Liabilities and Net Position</b>	<b>\$ 10,541,744</b>

The accompanying notes are an integral part of these financial statements.

**UNITED STATES OFFICE OF GOVERNMENT ETHICS  
STATEMENT OF NET COST  
FOR THE FISCAL YEAR ENDED SEPTEMBER 30, 2025  
(In Dollars)**

	2025
<b>Gross Program Costs</b>	
Salaries and Expenses	
Gross Costs	\$ 22,609,425
<b>Net Cost of Operations</b>	<b>\$ 22,609,425</b>

The accompanying notes are an integral part of these financial statements.

**UNITED STATES OFFICE OF GOVERNMENT ETHICS  
STATEMENT OF CHANGES IN NET POSITION  
FOR THE FISCAL YEAR ENDED SEPTEMBER 30, 2025  
(In Dollars)**

	2025
<b>Unexpended Appropriations</b>	
Beginning Balance	\$ 7,958,500
Appropriations Received	23,037,000
Other Adjustments	(523,642)
Appropriations Used	(21,192,711)
Net Change in Unexpended Appropriations	1,320,647
<b>Total Unexpended Appropriations</b>	<b>\$ 9,279,147</b>
<b>Cumulative Results of Operations</b>	
Beginning Balance	\$ (1,247,441)
Appropriations Used	21,192,711
Imputed Financing (Note 9)	1,340,264
Net Cost of Operations	(22,609,425)
Net Change in Cumulative Results of Operations	(76,450)
<b>Total Cumulative Results of Operations</b>	<b>\$ (1,323,891)</b>
<b>Net Position</b>	<b>\$ 7,955,256</b>

The accompanying notes are an integral part of these financial statements.

**UNITED STATES OFFICE OF GOVERNMENT ETHICS  
STATEMENT OF BUDGETARY RESOURCES  
FOR THE FISCAL YEAR ENDED SEPTEMBER 30, 2025  
(In Dollars)**

	2025
<b>Budgetary Resources</b>	
Unobligated Balance From Prior Year Budget Authority, Net (Note 10)	\$ 5,346,411
Appropriations	23,037,000
<b>Total Budgetary Resources</b>	<b>\$ 28,383,411</b>
<b>Status of Budgetary Resources</b>	
New Obligations and Upward Adjustments (Total)	\$ 21,801,178
Unobligated Balance, End of Year	
Apportioned, Unexpired Accounts	1,302,064
Unexpired, Unobligated Balance, End of Year	1,302,064
Expired, Unobligated Balance, End of Year	5,280,169
Unobligated Balance, End of Year (Total)	6,582,233
<b>Total Budgetary Resources</b>	<b>\$ 28,383,411</b>
<b>Outlays, Net and Disbursements, Net</b>	
Outlays, Net (Total)	\$ 20,885,701
<b>Agency Outlays, Net</b>	<b>\$ 20,885,701</b>

The accompanying notes are an integral part of these financial statements.

**NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

**Reporting Entity**

The U.S. Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978, provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE's mission is part of the very foundation of public service. The first principle in the Fourteen Principles of Ethical Conduct for Government Officers and Employees is "public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain." Public servants are expected to make impartial decisions based on the interests of the public when performing their job duties. OGE, in concert with agency ethics practitioners throughout the executive branch, ensures that employees fulfill this great trust.

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for more than 2 million employees in over 140 executive branch agencies and the White House; oversees financial disclosure systems that reaches more than 27,000 public and more than 400,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the approximately 5,000 ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and facilitating transparency and public understanding of government ethics.

OGE's greatest resource is its multidisciplinary staff of attorney, ethics and finance experts, and support personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents, and accomplishes its responsibilities by organizing cross-functional teams to perform such diverse tasks as working with Presidential nominees for appointments requiring Senate confirmation to resolve potential financial conflicts of interest, training executive branch ethics officials, and conducting oversight of executive branch ethics programs. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate.

OGE's General Funds are accounts used to record financial transactions arising under congressional appropriations or other authorizations to spend general revenues. General Fund Miscellaneous Receipts are accounts established for receipts of non-recurring activity, such as fines, penalties, fees and other miscellaneous receipts for services and benefits.

OGE has rights and ownership of all assets reported in these financial statements. The reporting entity is a component of the U.S. Government. For this reason, some of the assets and liabilities reported by the entity may be eliminated for Government-wide reporting because they are offset by assets and liabilities of another U.S. Government entity. These financial statements should be read with the realization that they are for a component of the U.S. Government, a sovereign entity. OGE does not possess any non-entity assets.

## **B. Basis of Presentation**

The financial statements have been prepared to report the financial position and results of operations of the OGE. The Balance Sheet presents the financial position of the agency. The Statement of Net Cost presents the agency's operating results; the Statement of Changes in Net Position displays the changes in the agency's equity accounts. The Statement of Budgetary Resources presents the sources, status, and uses of the agency's resources and follows the rules for the Budget of the United States Government.

The statements are a requirement of the Chief Financial Officers Act of 1990, the Government Management Reform Act of 1994 and the Accountability of Tax Dollars Act of 2002. They have been prepared from, and are fully supported by, the books and records of the OGE in accordance with the hierarchy of accounting principles generally accepted in the United States of America, standards issued by the Federal Accounting Standards Advisory Board (FASAB), Office of Management and Budget (OMB) Circular A-136, Financial Reporting Requirements, as amended, and the OGE's accounting policies which are summarized in this note. These statements, with the exception of the Statement of Budgetary Resources, are different from financial management reports, which are also prepared pursuant to OMB directives that are used to monitor and control the OGE's use of budgetary resources. The financial statements and associated notes are presented on a singular basis. Unless specified otherwise, all amounts are presented in dollars.

## **C. Basis of Accounting**

Transactions are recorded on both an accrual accounting basis and a budgetary basis. Under the accrual method, revenues are recognized when earned, and expenses are recognized when a liability is incurred, without regard to receipt or payment of cash. Budgetary accounting facilitates the control and monitoring of federal funds as well as the compliance with legal requirements on the use of those funds.



#### **D. Fund Balance with Treasury**

Fund Balance with Treasury is an asset of a reporting entity and a liability of the General Fund. It is the aggregate amount of the OGE's funds with Treasury in expenditure, receipt, revolving, and deposit fund accounts. Appropriated funds recorded in expenditure accounts are available to pay current liabilities and finance authorized purchases.

The OGE does not maintain bank accounts of its own, has no disbursing authority, and does not maintain cash held outside of Treasury. When the reporting entity seeks to use Fund Balance with Treasury or investments in Government securities to liquidate budgetary obligations, Treasury will finance the disbursements in the same way it finances all other disbursements, which is to borrow from the public if there is a budget deficit (and to use current receipts if there is a budget surplus). Funds are disbursed for the agency on demand.

#### **E. Accounts Receivable**

Accounts receivable consists of amounts owed to the OGE by other federal agencies and the general public. Amounts due from federal agencies are considered fully collectible. Accounts receivable from the public include reimbursements from employees. An allowance for uncollectible accounts receivable from the public is established when, based upon a review of outstanding accounts and the failure of all collection efforts, management determines that collection is unlikely to occur considering the debtor's ability to pay.

#### **F. Property, Equipment, and Software**

Property, equipment, and software represent furniture, fixtures, equipment, and information technology hardware and software which are recorded at original acquisition cost and are depreciated or amortized using the straight-line method over their estimated useful lives. Major alterations and renovations are capitalized, while maintenance and repair costs are expensed as incurred. The OGE's capitalization threshold is \$50,000 for individual purchases and \$500,000 for bulk purchases. Property, equipment, and software acquisitions that do not meet the capitalization criteria are expensed upon receipt. Applicable standard governmental guidelines regulate the disposal and convertibility of agency property, equipment, and software. The useful life classifications for capitalized assets are as follows:

<b><u>Description</u></b>	<b><u>Useful Life (years)</u></b>
Building	9
Leasehold Improvements	5
Office Furniture	5
Computer Equipment	3
Office Equipment	5
Software	5

#### **G. Advances and Prepaid Charges**

Advance payments are generally prohibited by law. There are some exceptions, such as reimbursable agreements, subscriptions and payments to contractors and employees. Payments made in advance of the receipt of goods and services are recorded as advances or prepaid charges at the time of prepayment and recognized as expenses when the related goods and services are received.

## **H. Liabilities**

Liabilities represent the amount of funds likely to be paid by the OGE as a result of transactions or events that have already occurred.

The OGE reports its liabilities under two categories, Intragovernmental and Other than Intragovernmental. Intragovernmental liabilities represent funds owed to another government agency. Liabilities other than intragovernmental represent funds owed to any entity or person that is not a federal agency, including private sector firms and federal employees. Each of these categories may include liabilities that are covered by budgetary resources and liabilities not covered by budgetary resources.

Liabilities covered by budgetary resources are liabilities funded by a current appropriation or other funding source. These consist of accounts payable and accrued payroll and benefits. Accounts payable represent amounts owed to another entity for goods ordered and received and for services rendered except for employees. Accrued payroll and benefits represent payroll costs earned by employees during the fiscal year which are not paid until the next fiscal year.

Liabilities not covered by budgetary resources are liabilities that are not funded by any current appropriation or other funding source. These liabilities consist of accrued annual leave, deferred rent actuarial FECA, and the amounts due to Treasury for collection and accounts receivable of civil penalties and FOIA request fees.

## **I. Annual, Sick, and Other Leave**

Annual leave is accrued as it is earned, and the accrual is reduced as leave is taken. The balance in the accrued leave account is adjusted to reflect current pay rates. Liabilities associated with other types of vested leave, including compensatory, restored leave, and sick leave in certain circumstances, are accrued at year-end, based on latest pay rates and unused hours of leave. Funding will be obtained from future financing sources to the extent that current or prior year appropriations are not available to fund annual and other types of vested leave earned but not taken. Nonvested leave is expensed when used. Any liability for sick leave that is accrued but not taken by a Civil Service Retirement System (CSRS)-covered employee is transferred to the Office of Personnel Management (OPM) upon the retirement of that individual. Credit is given for sick leave balances in the computation of annuities upon the retirement of Federal Employees Retirement System (FERS)-covered employees.

## **J. Accrued and Actuarial Workers' Compensation**

The Federal Employees' Compensation Act (FECA) administered by the U.S. Department of Labor (DOL) addresses all claims brought by the OGE's employees for on-the-job injuries. The DOL bills each agency annually as its claims are paid, but payment of these bills is deferred for two years to allow for funding through the budget process. Similarly, employees that the OGE terminates without cause may receive unemployment compensation benefits under the unemployment insurance program also administered by the DOL, which bills each agency quarterly for paid claims. Future appropriations will be used for the reimbursement to DOL. The liability consists of (1) the net present value of estimated future payments calculated by the DOL, and (2) the unreimbursed cost paid by DOL for compensation to recipients under the FECA.

## **K. Retirement Plans**

The OGE's employees participate in either the CSRS or the FERS. The employees who participate in CSRS are beneficiaries of the OGE's matching contribution, equal to seven percent of pay, distributed to their annuity account in the Civil Service Retirement and Disability Fund.

Prior to December 31, 1983, all employees were covered under the CSRS program. From January 1, 1984 through December 31, 1986, employees had the option of remaining under CSRS or joining FERS and Social Security. Employees hired as of January 1, 1987 are automatically covered by the FERS program. Both CSRS and FERS employees may participate in the federal Thrift Savings Plan (TSP). FERS employees receive an automatic agency contribution equal to one percent of pay and the OGE matches any employee contribution up to an additional four percent of pay. For FERS participants, the OGE also contributes the employer's matching share of Social Security.

FERS employees and certain CSRS reinstatement employees are eligible to participate in the Social Security program after retirement. In these instances, the OGE remits the employer's share of the required contribution.

The OGE recognizes the imputed cost of pension and other retirement benefits during the employees' active years of service. OPM actuaries determine pension cost factors by calculating the value of pension benefits expected to be paid in the future and communicate these factors to the OGE for current period expense reporting. OPM also provides information regarding the full cost of health and life insurance benefits. The OGE recognized the offsetting revenue as imputed financing sources to the extent these expenses will be paid by OPM.

The OGE does not report on its financial statements information pertaining to the retirement plans covering its employees. Reporting amounts such as plan assets, accumulated plan benefits, and related unfunded liabilities, if any, is the responsibility of the OPM, as the administrator.

## **L. Other Post-Employment Benefits**

The OGE's employees eligible to participate in the Federal Employees' Health Benefits Plan (FEHBP) and the Federal Employees' Group Life Insurance Program (FEGlIP) may continue to participate in these programs after their retirement. The OPM has provided the OGE with certain cost factors that estimate the true cost of providing the post-retirement benefit to current employees. The OGE recognizes a current cost for these and Other Retirement Benefits (ORB) at the time the employee's services are rendered. The ORB expense is financed by OPM, and offset by the OGE through the recognition of an imputed financing source.

## **M. Use of Estimates**

The preparation of the accompanying financial statements in accordance with generally accepted accounting principles requires management to make certain estimates and assumptions that affect the reported amounts of assets, liabilities, revenues, and expenses. Actual results could differ from those estimates.

## **N. Classified Activities**

Accounting standards require all reporting entities to disclose that accounting standards allow certain presentations and disclosures to be modified, if needed, to prevent the disclosure of classified information.

## NOTE 2. FUND BALANCE WITH TREASURY

Fund Balance with Treasury account balances as of September 30, 2025, were as follows:

	2025
<b>Status of Fund Balance With Treasury</b>	
Unobligated Balance	\$ 6,582,233
Obligated Balance Not Yet Disbursed	3,634,390
<b>Total Fund Balance With Treasury</b>	<b>\$ 10,216,623</b>

No discrepancies exist between the Fund Balance reflected on the Balance Sheet and the balances in the Treasury accounts.

The obligated balance not yet disbursed includes accounts payable, accrued expenses, and undelivered orders that have reduced unexpended appropriations but have not yet decreased the fund balance on hand. (see also Note #11)

## NOTE 3. PROPERTY, PLANT, AND EQUIPMENT, NET

Schedule of General Property, Plant, and Equipment, Net as of September 30, 2025:

	Acquisition Cost	Accumulated Depreciation and Amortization	Net Book Value
<b>2025</b>			
<b>Major Class:</b>			
Leasehold Improvements	\$ 388,563	\$ 83,562	\$ 305,001
Software	5,146,619	5,146,619	-
<b>Total</b>	<b>\$ 5,535,182</b>	<b>\$ 5,230,181</b>	<b>\$ 305,001</b>

## NOTE 4. LIABILITIES NOT COVERED BY BUDGETARY RESOURCES

The liabilities for the OGE as of September 30, 2025, include liabilities not covered by budgetary resources. Congressional action is needed before budgetary resources can be provided. Although future appropriations to fund these liabilities are likely and anticipated, it is not certain that appropriations will be enacted to fund these liabilities.

	2025
Intragovernmental-FECA	\$ 155,721
Unfunded Leave	893,828
Actuarial FECA	588,128
Total Liabilities Not Covered by Budgetary Resources	\$ 1,637,677
Total Liabilities Covered by Budgetary Resources	948,811
<b>Total Liabilities</b>	<b>\$ 2,586,488</b>

FECA liability represent the unfunded liability for actual workers compensation claims paid on the OGE's behalf and payable to the DOL. The OGE also records an actuarial liability for future workers compensation claims based on the liability to benefits paid (LBP) ratio provided by DOL and multiplied by the average of benefits paid over three years.

Unfunded leave represents a liability for earned leave and is reduced when leave is taken. The balance in the accrued annual leave account is reviewed quarterly and adjusted as needed to accurately reflect the liability at current pay rates and leave balances. Accrued annual leave is paid from future funding sources and, accordingly, is reflected as a liability not covered by budgetary resources. Sick and other leave is expensed as taken.

#### **NOTE 5. ACTUARIAL FECA LIABILITY**

FECA provides income and medical cost protection to covered federal civilian employees harmed on the job or who have contracted an occupational disease, and beneficiaries of employees whose death is attributable to a job-related injury or occupational disease. Claims incurred for benefits under FECA for the OGE employees are administered by the DOL and ultimately paid by the OGE when funding becomes available.

The OGE bases its estimate for FECA actuarial liability on the DOL's FECA model. The DOL method of determining the liability uses historical benefits payment patterns for a specific incurred period to predict the ultimate payments for the period. Based on the information provided by the DOL, the OGE's liability as of September 30, 2025, was \$588,128 million.

#### **NOTE 6. OTHER LIABILITIES**

Other liabilities account balances as of September 30, 2025, were as follows:

	Current	Non-Current	Total
<b>2025</b>			
Intragovernmental Other Liabilities			
Employer Contributions and Payroll Taxes Payable (without reciprocals)	\$ 40,684	\$ -	\$ 40,684
Employer Contributions and Payroll Taxes Payable	65,956	-	65,956
Unfunded FECA Liability	155,721	-	155,721
Total Intragovernmental Other Liabilities	\$ 262,361	\$ -	\$ 262,361
<b>Total Other Liabilities</b>	<b>\$ 262,361</b>	<b>\$ -</b>	<b>\$ 262,361</b>

## NOTE 7. LEASES

The OGE occupies office space under a lease agreement that is accounted for as an intragovernmental lease per SFFAS 54 guidance. The lease term begins on February 2, 2024 and expires on October 1, 2031. Lease payments are increased annually based on the adjustments for operating cost and real estate tax escalations. The total operating lease expense for fiscal year 2025 was \$293,363.

Below is a schedule of future payments for the term of the lease:

	Buildings	Total Federal
<b>Fiscal Year</b>		
2026	\$ 327,291	\$ 327,291
2027	331,990	331,990
2028	336,830	336,830
2029	341,815	341,815
2030	346,949	346,949
2031	352,238	352,238
<b>Total</b>	<b>\$ 2,037,113</b>	<b>\$ 2,037,113</b>

The operating lease amount does not include estimated payments for leases with annual renewal options.

## NOTE 8. COMMITMENTS AND CONTINGENCIES

The OGE did not have any material contingent liabilities that met disclosure requirements as of September 30, 2025.

## NOTE 9. INTER-ENTITY COSTS

OGE recognizes certain inter-entity costs for goods and services that are received from other federal entities at no cost or at a cost less than the full cost. Certain costs of the providing entity that are not fully reimbursed are recognized as imputed cost and are offset by imputed revenue. Such imputed costs and revenues relate to employee benefits and claims to be settled by the Treasury Judgement Fund. OGE recognizes as inter-entity costs the amount of accrued pension and post-retirement benefit expenses for current employees.

The assets and liabilities associated with such benefits are the responsibility of the administering agency, OPM. For the fiscal year ended September 30, 2025 inter-entity costs were as follows:

	2025
Office of Personnel Management	\$ 1,340,264
<b>Total Imputed Financing Sources</b>	<b>\$ 1,340,264</b>

**NOTE 10. UNOBLIGATED BALANCE FROM PRIOR YEAR BUDGET AUTHORITY, NET**

The Unobligated Balance Brought Forward from the prior fiscal year has been adjusted for recoveries of prior year paid and unpaid obligations and other changes such as canceled authority. The Adjustments to Unobligated Balance Brought Forward, October 1, as of September 30, 2025, consisted of the following:

	<b>2025</b>
Unobligated Balance Brought Forward from Prior Year, October 1	\$ 4,775,836
Recoveries of Prior Year Obligations	1,094,217
Other Changes in Unobligated Balances	(523,642)
<b>Unobligated Balance from Prior Year Budget Authority, Net (Discretionary and Mandatory)</b>	<b>\$ 5,346,411</b>

**NOTE 11. UNDELIVERED ORDERS AT THE END OF THE PERIOD**

Budgetary resources obligated for undelivered orders as of September 30, 2025 were as follows:

	<b>Intragovernmental</b>	<b>Other than Intragovernmental</b>	<b>Total</b>
<b>2025</b>			
Paid Undelivered Orders	\$ 20,120	\$ -	\$ 20,120
Unpaid Undelivered Orders	241,139	2,444,440	2,685,579
<b>Total Undelivered Orders</b>	<b>\$ 261,259</b>	<b>\$ 2,444,440</b>	<b>\$ 2,705,699</b>

**NOTE 12. EXPLANATION OF DIFFERENCES BETWEEN THE STATEMENT OF BUDGETARY RESOURCES AND THE BUDGET OF THE U.S. GOVERNMENT**

The President's Budget that will include fiscal year 2025 actual budgetary execution information has not yet been published. The President's Budget is scheduled for publication in February 2026 and can be found at the OMB website: <http://www.whitehouse.gov/omb/>. The Fiscal Year 2026 Budget of the United States Government, with the "Actual" column completed for 2024, has been reconciled to the Statement of Budgetary Resources and there were no material differences.

(In Millions)

	<b>Total Budgetary Resources</b>	<b>New Obligations &amp; Upward Adjustments (Total)</b>	<b>Distributed Offsetting Receipts</b>	<b>Net Outlays</b>
Combined Statement of Budgetary Resources	\$ 26	\$ 21	\$ -	\$ 23
Unobligated Balance Not Available	(3)	-	-	-
<b>Budget of the U.S. Government</b>	<b>\$ 23</b>	<b>\$ 21</b>	<b>\$ -</b>	<b>\$ 23</b>

**NOTE 13: RECONCILIATION OF NET OPERATING COST & NET BUDGETARY OUTLAYS**

The reconciliation of net outlays, presented on a budgetary basis, and the net cost, presented on an accrual basis, provides an explanation of the relationship between budgetary and financial accounting information. The reconciliation of Net Cost to Net Outlays as of September 30, 2025:

	Intragovern- mental	Other than Intragovern- mental	Total
<b>Net Operating Cost (Revenue) Reported on Statement of Net Cost</b>	<b>\$ 7,016,032</b>	<b>\$ 15,593,393</b>	<b>\$ 22,609,425</b>
<b>Components of Net Operating Cost Not Part of the Budgetary Outlays</b>			
Property, Plant, and Equipment Depreciation Expense	-	(83,562)	(83,562)
<b>Increase/(Decrease) in Assets Not Affecting Budgetary Outlays:</b>			
Advances and Prepayments	20,120	-	20,120
<b>(Increase)/Decrease in Liabilities Not Affecting Budgetary Outlays:</b>			
Accounts Payable	210	(246,588)	(246,378)
Federal Employee Salary, Leave, and Benefits Payable	-	6,786	6,786
Pension, Other Post-Employment, and Veterans Benefits Payable	-	(22,276)	(22,276)
Other Liabilities	(58,150)	-	(58,150)
<b>Financing Sources:</b>			
Imputed Cost	(1,340,264)	-	(1,340,264)
<b>Total Components of Net Operating Cost Not Part of the Budgetary Outlays</b>	<b>\$ (1,378,084)</b>	<b>\$ (345,640)</b>	<b>\$ (1,723,724)</b>
<b>Misc Items</b>			
Custodial/Non-Exchange Revenue	840	(840)	-
<b>Total Other Reconciling Items</b>	<b>\$ 840</b>	<b>\$ (840)</b>	<b>\$ -</b>
<b>Total Net Outlays (Calculated Total)</b>	<b>\$ 5,638,788</b>	<b>\$ 15,246,913</b>	<b>\$ 20,885,701</b>
<b>Budgetary Agency Outlays, net</b>			<b>\$ 20,885,701</b>





## INDEPENDENT AUDITOR'S REPORT

U.S. Office of Government Ethics  
Washington, D.C.

In our audit of the fiscal year 2025 financial statements of the U.S. Office of Government Ethics (OGE), we found:

- OGE's financial statements as of and for the fiscal year ended September 30, 2025, presented fairly, in all material respects, in accordance with U.S. generally accepted accounting principles;
- no material weaknesses in internal control over financial reporting based on the limited procedures<sup>1</sup> we performed; and
- no reportable noncompliance for fiscal year 2025 with provisions of applicable laws, regulations, contracts, and grant agreements we tested.

The following sections discuss in more detail (1) our report on the financial statements, which includes a section on required supplementary information (RSI)<sup>2</sup> and a section on other information included with the financial statements<sup>3</sup>; (2) our report on internal control over financial reporting; and (3) our report on compliance with laws, regulations, contracts, and grant agreements.

### Report on the Financial Statements

#### Opinion

In accordance with U.S. generally accepted government auditing standards we have audited OGE's financial statements. OGE's financial statements comprise the balance sheet as of September 30, 2025; the related statements of net cost, changes in net position, and budgetary resources for the fiscal year then ended; and the related notes to the financial statements. In our opinion, OGE's financial statements present fairly, in all material respects, OGE's financial position as of September 30, 2025, and its net costs of operations, changes in net position, and budgetary resources for the fiscal year then ended in accordance with U.S. generally accepted accounting principles.

#### Basis for Opinion

We conducted our audits in accordance with U.S. generally accepted government auditing standards. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of OGE and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit.

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<sup>1</sup> A material weakness is a deficiency, or combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis.

<sup>2</sup> The RSI consists of "Management's Discussion and Analysis" and the "Statement of Budgetary Resources", which are included with the financial statements.

<sup>3</sup> Other information consists of information included with the financial statements, other than the RSI and the auditor's report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### Responsibilities of Management for the Financial Statements

Management is responsible for:

- the preparation and fair presentation of these financial statements in accordance with U.S. generally accepted accounting principles;
- preparing, measuring, and presenting the RSI in accordance with U.S. generally accepted accounting principles;
- preparing and presenting other information included in OGE's Agency Financial Report (AFR) and ensuring the consistency of that information with the audited financial statements and the RSI; and
- designing, implementing, and maintaining effective internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to (1) obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and (2) issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit of the financial statements conducted in accordance with U.S. generally accepted government auditing standards will always detect a material misstatement or a material weakness when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements, including omissions, are considered to be material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with U.S. generally accepted government auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to our audit of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of OGE's internal control over financial reporting. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Perform other procedures we consider necessary in the circumstances.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the financial statement audit.

### Required Supplementary Information

U.S. generally accepted accounting principles issued by the Federal Accounting Standards Advisory Board (FASAB) require that the RSI be presented to supplement the financial statements. Such information is the responsibility of management and, although not a part of the financial statements, is required under standards issued by FASAB, which considers it to be an essential part of financial reporting for placing the financial statements in appropriate operational, economic, or historical context.

We have applied certain limited procedures to the RSI in accordance with U.S. generally accepted government auditing standards. These procedures consisted of (1) inquiring of management about the methods used to prepare the RSI and (2) comparing the RSI for consistency with management's responses to the auditor's inquiries, the financial statements, and other knowledge we obtained during the audit of the financial statements, in order to report omissions or material departures from FASAB guidelines, if any, identified by these limited procedures. We did not audit and we do not express an opinion or provide any assurance on the RSI because the limited procedures we applied do not provide sufficient evidence to express an opinion or provide any assurance.

### Other Information

OGE's other information contains a wide range of information, some of which is not directly related to the financial statements. This information is presented for purposes of additional analysis and is not a required part of the financial statements or the RSI. Management is responsible for the other information included in OGE's AFR. The other information comprises the following sections: a detailed statement of management assurances and other information that is applicable. Other information does not include the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the financial statements, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

### **Report on Internal Control over Financial Reporting**

In connection with our audits of OGE's financial statements, we considered OGE's internal control over financial reporting, consistent with our auditor's responsibilities discussed below.

### Results of Our Consideration of Internal Control over Financial Reporting

Our consideration of internal control was for the limited purpose described below, and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies<sup>4</sup> or to express an opinion on the effectiveness of OGE's internal control over financial reporting. Given these limitations, during our 2025 audit, we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that have not been identified.

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<sup>4</sup> A significant deficiency is a deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

### Basis for Results of Our Consideration of Internal Control over Financial Reporting

We performed our procedures related to OGE's internal control over financial reporting in accordance with U.S. generally accepted government auditing standards and Office of Management and Budget audit guidance.

### Responsibilities of Management for Internal Control over Financial Reporting

OGE management is responsible for designing, implementing, and maintaining effective internal control over financial reporting relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### Auditor's Responsibilities for the Consideration of Internal Control over Financial Reporting

In planning and performing our audit of OGE's financial statements as of and for the fiscal year ended September 30, 2025, in accordance with U.S. generally accepted government auditing standards, we considered OGE's internal control relevant to the financial statement audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of OGE's internal control over financial reporting. Accordingly, we do not express an opinion on OGE's internal control over financial reporting. We are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses. We did not consider all internal controls relevant to operating objectives, such as those controls relevant to preparing performance information and ensuring efficient operations.

### Definition and Inherent Limitations of Internal Control over Financial Reporting

OGE's internal control over financial reporting is a process effected by those charged with governance, management, and other personnel. The objectives of internal control over financial reporting are to prove reasonable assurance that:

- transactions are properly recorded, processed, and summarized to permit the preparation of financial statements in accordance with U.S. generally accepted accounting principles, and assets are safeguarded against loss from unauthorized acquisition, use, or disposition, and
- transactions are executed in accordance with provisions of applicable laws, including those governing the use of budget authority, regulations, contracts, and grant agreements, noncompliance with which could have a material effect on the financial statements.

Because of its inherent limitations, internal control over financial reporting may not prevent, or detect and correct, misstatements due to fraud or error.

### Intended Purpose of Report on Internal Control over Financial Reporting

The purpose of this report is solely to describe the scope of our consideration of OGE's internal control over financial reporting and the results of our procedures, and not to provide an opinion on the effectiveness of OGE's internal control over financial reporting. This report is an integral part of an audit performed in accordance with U.S. generally accepted government auditing standards in considering internal control over financial reporting. Accordingly, this report on internal control over financial reporting is not suitable for any other purpose.

## **Report on Compliance with Laws, Regulations, Contracts, and Grant Agreements**

In connection with our audits of OGE's financial statements, we tested compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements consistent with our auditor's responsibilities discussed below.

### Results of Our Tests for Compliance with Laws, Regulations, Contracts, and Grant Agreements

Our tests for compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements disclosed no instances of noncompliance for fiscal year 2025 that would be reportable under U.S. generally accepted government auditing standards. However, the objective of our tests was not to provide an opinion on compliance with laws, regulations, contracts, and grant agreements applicable to OGE. Accordingly, we do not express such an opinion.

### Basis for Results of Our Tests for Compliance with Laws, Regulations, Contracts, and Grant Agreements

We performed our tests of compliance in accordance with U.S. generally accepted government auditing standards.

### Responsibilities of Management for Compliance with Laws, Regulations, Contracts, and Grant Agreements

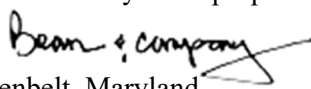
OGE management is responsible for complying with laws, regulations, contracts, and grant agreements applicable to OGE.

### Auditor's Responsibilities for Tests of Compliance with Laws, Regulations, Contracts, and Grant Agreements

Our responsibility is to test compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements applicable to OGE that have a direct effect on the determination of material amounts and disclosures in OGE's financial statements, and to perform certain other limited procedures. Accordingly, we did not test compliance with all laws, regulations, contracts, and grant agreements applicable to OGE. We caution that noncompliance may occur and not be detected by these tests.

### Intended Purpose of Report on Compliance with Laws, Regulations, Contracts, and Grant Agreements

The purpose of this report is solely to describe the scope of our testing of compliance with selected provisions of applicable laws, regulations, contracts, and grant agreements, and the results of that testing, and not to provide an opinion on compliance. This report is an integral part of an audit performed in accordance with U.S. generally accepted government auditing standards in considering compliance. Accordingly, this report on compliance with laws, regulations, contracts, and grant agreements is not suitable for any other purpose.

  
Greenbelt, Maryland  
December 16, 2025

## Part IV – Other Information

**Table 1. Summary of Financial Statement Audit**

Audit Opinion	Unmodified				
Restatement	No				
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Ending Balance
[Name of weakness]					
[Name of weakness]					
[Name of weakness]					
<i>Total Material Weaknesses</i>	0	0	0	0	0

**Table 2. Summary of Management Assurances**

Effectiveness of Internal Control over Financial Reporting (FMFIA § 2)						
Statement of Assurance	Unmodified					
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
[Name of weakness]						
[Name of weakness]						
[Name of weakness]						
<i>Total Material Weaknesses</i>	0	0	0	0	0	0
Effectiveness of Internal Control over Operations (FMFIA § 2)						
Statement of Assurance	Unmodified					
Material Weaknesses	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
[Name of weakness]						
[Name of weakness]						
[Name of weakness]						
<i>Total Material Weaknesses</i>	0	0	0	0	0	0
Conformance with Federal Financial Management System Requirements (FMFIA § 4)						
Statement of Assurance	Federal Systems conform to financial management system requirements					
Non-Conformances	Beginning Balance	New	Resolved	Consolidated	Reassessed	Ending Balance
[Name of non-conformance]						
[Name of non-conformance]						
[Name of non-conformance]						
<i>Total non-conformances</i>	0	0	0	0	0	0
Compliance with Section 803(a) of the Federal Financial Management Improvement Act (FFMIA)						
	Agency			Auditor		
1. Federal Financial Management System Requirements	No lack of compliance noted			No lack of compliance noted, or Lack of compliance noted		
2. Applicable Federal Accounting Standards	No lack of compliance noted			No lack of compliance noted, or Lack of compliance noted		
3. USSGL at Transaction Level	No lack of compliance noted			No lack of compliance noted, or Lack of compliance noted		

**Beginning Balance:** The beginning balance must agree with the ending balance from the prior year.

**New:** The total number of material weaknesses/non-conformances identified during the current year.

**Resolved:** The total number of material weaknesses/non-conformances that dropped below the level of materiality in the current year.

**Consolidated:** The combining of two or more findings.

**Reassessed:** The removal of any finding not attributable to corrective actions (e.g., management has re- evaluated and determined that a finding does not meet the criteria for materiality or is redefined as more correctly classified under another heading).  
**Ending Balance:** The year-end balance that will be the beginning balance next year.

## Payment Integrity Information Act Reporting

OGE has completed the Fiscal Year 2025 Improper Payments Data Call per guidance provided.  
The results can be found at: <https://www.paymentaccuracy.gov/>

## Civil Monetary Penalty Adjustment for Inflation

Statutory Authority	Penalty (Name or Description )	Year Enacted	Latest year of adjustment (via statute or regulation)	Current Penalty Level (\$ Amount or Range)	Sub- Agency/ Bureau/ Unit	Penalty Update Details
Ethics in Government Act of 1978 as amended	5 CFR 2634.702(a) Breaches by trust fiduciaries and interested parties; 2634.703 -Misuse of public reports; and 2636.104(a) – Civil, disciplinary and other action	1978	2025	\$25,132.00	U.S. Office of Government Ethics	90 FR 3610 <a href="https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations">https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations</a>
Ethics in Government Act of 1978 as amended	5 CFR 2634.702(b) Breaches by trust fiduciaries and interested parties	1978	2025	\$12,567.00	U.S. Office of Government Ethics	90 FR 3610 <a href="https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations">https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations</a>
Ethics in Government Act of 1978 as amended	5 CFR 2634.701(b) Failure to file or falsifying reports	1978	2025	\$75,540.00	U.S. Office of Government Ethics	90 FR 3610 <a href="https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations">https://www.federalregister.gov/documents/2025/01/15/2025-00671/2025-civil-monetary-penalties-inflation-adjustments-for-ethics-in-government-act-violations</a>