

U.S. OFFICE OF
GOVERNMENT
ETHICS

RESULTS FROM THE
ANNUAL
AGENCY ETHICS
PROGRAM
QUESTIONNAIRE
CY25

A
SNAPSHOT
OF THE EXECUTIVE
BRANCH ETHICS
PROGRAM

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Section I – 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 139 agency responses submitted for calendar year 2025. 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.¹ OGE collects the required reports via the questionnaire.²

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
- Special Government Employees

¹ See 5 U.S.C. § 13122(e)(1).

² See 5 C.F.R. § 2638.207.

Changes to the Questionnaire

In the 2025 questionnaire, OGE added no new questions or response options. OGE deleted one response option (Q. 23) and the former Part 11 (Ethics Pledge Assessment). 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 25-04](#), which included a red-line version of the edits.

Methodology

The questionnaire covered agency ethics program activities that occurred in calendar year 2025. OGE provided an [advance copy of the questionnaire](#) to every Designated Agency Ethics Official in July 2025. OGE opened the survey on December 30, 2025, and agency responses were due on February 2, 2026.³

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.

Response Rate

Response rate: 98%

There were 142 agencies for purposes of the questionnaire in 2025. One-hundred and thirty nine (139) agencies responded.⁴

The term "agency" refers to every entity that has a Designated Agency Ethics Official (DAEO).⁵ 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:

³ See 5 C.F.R. § 2638.207(a).

⁴ The Marine Mammal Commission, Office of Navajo and Hopi Indian Relocation, and the United States Commission for the Preservation of America's Heritage Abroad did not respond.

⁵ See 5 C.F.R. § 2638.104(a).

- 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.⁶
- OGE’s primary method for conducting oversight of agency ethics programs is through program review. 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.

⁶ Questions 2, 16-17, 20, 34-39, and 43-45

Section 2 – Key Highlights

This section provides key highlights from the aggregated responses of the 139 agencies that responded for calendar year 2025.⁷ 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, and enforcement.

Ethics Officials & Resourcing

The executive branch ethics program is decentralized and relies on officials in each of the agencies to carry out a compliant program for the employees of their agency.⁸ According to the 2025 questionnaire responses, more than 7,400 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.⁹ The questionnaire responses show that in 2025 most DAEOs (80%) were career employees.

The responses show that 67% of DAEOs had spent less than five (5) years in their current positions, and 63% had five (5) or more years of ethics experience. Additionally, 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, **799 (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, **2,186 full-time equivalent positions supported the ethics program across the executive branch in 2025.** ([See Q5](#))

Of the 139 agencies, **56 (40%) reported needing more resources.** Agencies most frequently indicated needing additional resources in the area of human capital (49 agencies), followed by technology (35 agencies). ([See Q9](#)) **The agency head met with the ethics staff at 104 (75%) agencies** to discuss the strengths and weaknesses of the ethics program in 2025. ([See Q10](#))

⁷ 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.

⁸ See 5 C.F.R. § 2638.104.

⁹ 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.

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 2025 questionnaire results demonstrated a high rate of employee compliance with the filing requirements:¹⁰

- **Ninety-nine percent (99%) of those required to file public financial disclosures did so:** 32,883 reports filed out of 33,301 required. ([See Q36](#) and [Q52](#))
- **More than 99% of those required to file confidential financial disclosures did so:** 407,009 reports filed out of 407,912 required. ([See Q43](#) and [Q52](#))

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.¹¹ In 2025, public filers submitted **21,780 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 2025, agencies reported that they conducted **timely reviews for 95% of the reports certified**. ([See Q37](#), [Q44](#), and [Q53](#))

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.

- In 2025, agencies reported that they **certified 90% of reports within 60 days** ([See Q37](#), [Q44](#), and [Q53](#))

¹⁰ For filing requirements, see 5 C.F.R. §§ 2634.201, .903.

¹¹ See 5 C.F.R. §§ 2634.201(f), .309

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.¹² Without this transparency, the public could not as meaningfully oversee the integrity of its government.

In 2025, agencies reported receiving a total of 1,649 requests for 7,920 documents under the **Ethics in Government Act**. ([See Q41](#) and [Q42](#))

In 2025, **OGE processed additional requests** from the public and the news media to inspect nearly 18,000 **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 139 agencies used *Integrity*, OGE's executive branch-wide electronic filing system**, for at least some of their public disclosure reports. In addition, 81 agencies reported using other electronic filing systems for other public and/or confidential reports. ([See Q32](#))

Education and 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 [Q51](#)):¹³

- **Ninety-five percent (95%)** of new Presidentially appointed, Senate-confirmed appointees **timely received their required initial ethics briefing**.
- **Ninety-four percent (94%)** of new employees **timely received their required initial ethics training**.¹⁴
- **Ninety-one percent (91%)** 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.

¹² See 5 C.F.R. § 2634.603.

¹³ For training requirements, see 5 C.F.R. pt. 2638, subpt. C.

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

Thirty-seven percent (37%) of agencies established additional ethics education requirements, beyond the minimum required by regulation. ([See Q21](#))

In addition, **81%** of agencies **reported assessing risk** to determine the content, format, and/or timing of their ethics education, and **79%** of agencies **reported assessing the effectiveness of their education programs**. ([See Q22](#) and [Q23](#))

Advice and 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 2025, **employees most frequently sought ethics guidance on outside employment/activities, financial disclosure reporting, gift acceptance, and post-government employment**. ([See Q24](#))

All employees must recuse from government matters that affect the financial interest of someone with whom they are seeking employment.¹⁵ 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.¹⁶ In 2025, these **senior officials filed 3,568 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 2025, **agencies issued 249 such waivers to employees (18 U.S.C. § 208 (b)(1))**. In addition, agencies issued **102** waivers to special Government employees serving on Federal Advisory Committee Act (FACA) committees (**18 U.S.C. § 208 (b)(3)**). ([See Q26](#))

¹⁵ See 18 U.S.C. § 208; 5 C.F.R. § 2635.604.

¹⁶ 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.

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.¹⁷ 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.¹⁸ 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 (71) agencies reported **33,470 special Government employees** served during calendar year 2025. The **majority (95%) of SGEs served at three (3) agencies.** ([See Q50](#))

The vast majority of SGEs are required to file financial disclosure. Of those required to file, **less than one percent (0.9%) are required to file a public financial disclosure reports and more than ninety-nine percent (99%) are required to file a confidential financial disclosure report.** Of those required to file:

- Eighty-two percent (82%) of those required to file public financial disclosures did so: 204 reports filed out of 248 required. ([See Q52](#))
- More than ninety-nine percent (99.4%) of those required to file confidential financial disclosures did so: 26,512 reports filed out of 26,660 required. ([See Q52](#))

Enforcement

Each agency is responsible for investigating and taking action against an employee who potentially has violated an ethics rule or law.¹⁹ 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-one (31) agencies reported taking **1,098 disciplinary actions based wholly or in part upon violations of the Standards of Conduct** (multiple actions could be taken against one individual).

The largest share of disciplinary actions (46%) involved violations of the regulations governing **misuse of position.** ([See Q46](#))

¹⁷ 18 U.S.C. § 202(a).

¹⁸ 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.

¹⁹ See 5 C.F.R. § 2638.107(d).

Nine (9) agencies reported taking 18 disciplinary actions based wholly or in part upon **violations of criminal or civil statutes** (multiple actions could be taken against one individual). **Sixty-seven percent (67%) 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-five (25) agencies reported a total of one-hundred and forty-one (141) referrals to the Department of Justice** concerning potential violations of the criminal conflict of interest statutes. ([See Q48](#))

Agencies reported that **zero (0) public financial disclosure filers** were reported to the Attorney General for **failure to file**. ([See Q40](#))

Section 3 – Compilation of Agency Responses

For each question, the bold number is the aggregated response for all 139 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**

2025 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 (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 agency programs, as well as the overall executive branch ethics program, and to make informed decisions about resource allocation 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 2, 2026. (5 C.F.R. § 2638.207(a)).

PART 2. INSTRUCTIONS

Your response to this questionnaire should reflect the 2025 calendar year (i.e., 1/1/2025 through 12/31/2025), 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 2024 report. To safeguard privacy, please avoid the use of Personally Identifiable Information (PII) in your responses. 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: _____ **139**
2. Number of full-time agency employees as of December 31, 2025: _____ **4,003,790**
3. Information about the Designated Agency Ethics Official (DAEO):

a. Vacant (as of December 31, 2025)?	<input type="checkbox"/> Yes (<i>skip to #4a</i>) 12 (9%) <input type="checkbox"/> No 127 (91%)
b. Time in current DAEO position	<input type="checkbox"/> Less than 1 year 46 (36%) <input type="checkbox"/> 1-4 years 40 (31%) <input type="checkbox"/> 5-9 years 19 (15%) <input type="checkbox"/> 10 or more years 22 (17%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 17 (13%) <input type="checkbox"/> 1-4 years 30 (24%) <input type="checkbox"/> 5-9 years 19 (15%) <input type="checkbox"/> 10 or more years 61 (48%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 97 (76%) <input type="checkbox"/> 26-50% 15 (12%) <input type="checkbox"/> 51-75% 6 (5%) <input type="checkbox"/> 76-100% 9 (7%)
e. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 101 (80%) <input type="checkbox"/> political appointee 26 (20%)
f. Number of reporting levels between the DAEO and the agency head.	<input type="checkbox"/> 0 (the agency head is the DAEO) 5 (4%) <input type="checkbox"/> 1 93 (73%) <input type="checkbox"/> 2 26 (20%) <input type="checkbox"/> 3 3 (2%) <input type="checkbox"/> 4 or more 0 (0%)

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

a. Vacant (as of December 31, 2025)?	<input type="checkbox"/> Yes (<i>skip to #5</i>) 15 (11%) <input type="checkbox"/> No 124 (89%)
b. Time in current ADAEO position	<input type="checkbox"/> Less than 1 year 40 (32%) <input type="checkbox"/> 1-4 years 47 (38%) <input type="checkbox"/> 5-9 years 23 (19%) <input type="checkbox"/> 10 or more years 14 (11%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 10 (8%) <input type="checkbox"/> 1-4 years 26 (21%) <input type="checkbox"/> 5-9 years 34 (27%) <input type="checkbox"/> 10 or more years 54 (44%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 57 (46%)

	<input type="checkbox"/> 26-50% 23 (19%) <input type="checkbox"/> 51-75% 10 (8%) <input type="checkbox"/> 76-100% 34 (28%)
e. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 120 (97%) <input type="checkbox"/> political appointee 4 (3%)

5. Report the number of employees, including the DAEO and ADAEO, who performed ethics program duties in 2025 (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 (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area	766	704	221	96	541	2,328
b. Outside the D.C. Metro area	1,724	2,554	444	141	258	5,121
TOTAL	2,490	3,258	665	237	799	7,449

*FTE = Full Time Equivalent

Example: The table below provides an example of an agency with 13 employees who performed ethics program duties in 2025.

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

6. In what areas did contractors support the ethics program? Select all that apply.
- Not applicable (no contractors supported the ethics program) **81**
 - IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.)
Describe the IT support (*optional*): _____ **48** [Table 1](#)
 - Administrative support (e.g., tracking filing or training requirements, sending reminders, data entry, etc.)
Describe the administrative support (*optional*): _____ **23** [Table 2](#)
 - Substantive ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.)
Describe the substantive support (*optional*): _____ **8** [Table 3](#)
 - Other
Describe the other support: _____ **3** [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 **34 (24%)**
Provide the name(s) of the federal agency or entity: _____ [Table 5](#)
Describe the services or support received: _____ [Table 6](#)
 - No **105 (76%)**
8. Did your agency **provide** ethics program services or support for any board, commission, or agency that is independent of your agency?
- Yes **19 (14%)**
Provide the name(s) of the board, commission, or agency: _____ [Table 7](#)
Describe the services or support provided: _____ [Table 8](#)
 - No **120 (86%)**
9. Does your agency's ethics program need additional resources? Select all that apply.
- No additional resources needed **83**
 - Human Capital **49**
 - Technology **35**
 - Other
Describe the other resources: _____ **12** [Table 9](#)

10. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2025?

Yes **104 (76%)**

No **33 (24%)**

Not applicable

Explain why not applicable: _____ **2** [Table 10](#)

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 2025 (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 **66**

An entity outside of my agency, other than OGE, (e.g., GAO or a private auditing firm) conducted an evaluation **11**

No evaluation was conducted (*skip to #13*) **69**

12. What kind of changes resulted from the evaluation?

Programmatic changes

Describe the programmatic changes: _____ **42** [Table 11](#)

Policy changes

Describe the policy changes: _____ **18** [Table 12](#)

No changes resulted

Explain why not: _____ **15** [Table 13](#)

Recommendations still being considered **5**

Evaluation has not been completed **2**

Not applicable

Explain why not applicable: _____ **0** [Table 14](#)

13. Of the following required written procedures, which did you have in place? Select 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)) **137**
- Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. § 2638.303) **130**
- Provision of initial ethics training (5 C.F.R. § 2638.304) **136**
- Issuance of ethics notice to new supervisors (5 C.F.R. § 2638.306) **129**
- None

Explain what steps you are taking to implement the required written procedures: _____ **2** [Table 15](#)

ADDITIONAL COMMENTS FOR PART 4. 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 **2**
 - All of the offices provided written confirmation to the DAEO (*skip to #16*) **49 (96%)**
 - Some of the offices provided written confirmation to the DAEO
Explain why not all offices (*then skip to #16*): _____ **1 (2%)** [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 **60 (92%)**
 - Some of the written offers included the required information
Explain why not all offers: _____ **4 (6%)** [Table 19](#)
 - None of the written offers included the required information
Explain why not all offers: _____ **1 (2%)** [Table 20](#)
 - Not applicable because no offers of employment were made **18**
 - Not applicable for another reason
Explain why not applicable: _____ **5** [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, 2025? Exclude SGEs that were expected to serve less than 60 days on a board, commission, or committee.	341
i. How many new agency leaders received their briefing within 15 days of their appointment?	325 (95%)
ii. How many new agency leaders received their briefing beyond the 15-day requirement?	16 (5%)
iii. How many new agency leaders have yet to receive their briefing as of today?	0 (0%)

If applicable, 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, 2025 (5 C.F.R. § 2638.304)? Exclude 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).)	232,551
i. How many of those employees received IET within the 3-month requirement?	218,263 (94%)
ii. How many of those employees received IET beyond the 3-month requirement?	6,281 (3%)
iii. How many of those employees have not received IET as of today?	8,007 (3%)

If applicable, 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, 2025, 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, 2026, the employee has not completed IET, do not count that employee in your required numbers. Instead, include the employee in your 2026 questionnaire response to be filed in 2027.

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 **79**
- Written confirmation not required because all IET was provided by an office under the DAEO’s supervision **36**
- All of the offices provided the written confirmation to the DAEO **23 (96%)**
- Some of the offices provided the written confirmation to the DAEO

Explain why not all offices: 1 (4%) [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 2025?

- Yes **125 (95%)**
- No

Explain why not: 6 (5%) [Table 26](#)

- Not applicable

Explain why not applicable: 8 [Table 27](#)

20. Required Annual Ethics Training

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)
a. Executive Schedule Level I or Level II public filers (OGE Form 278e)	27	27 (100%)
b. All other public filers (OGE Form 278e)	19,534	18,287 (94%)
c. Confidential filers (OGE Form 450 and OGE-approved alternative confidential financial disclosure forms)	334,959	324,166 (97%)
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.)	17,292	16,909 (98%)
TOTAL	371,812	359,389 (97%)

If applicable, 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).

Describe the additional training requirements: _____ [18 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).

Describe the additional training requirements: _____ [37 Table 30](#)

- My agency established additional training procedures (e.g., certification procedures). Pursuant to 5 C.F.R. § 2638.309(c).

Describe the additional training procedures: _____ [7 Table 31](#)

- No, my agency did not establish additional training requirements__ [87](#)

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 __ [75](#)
- Discussed upcoming work and agency priorities with senior staff__ [88](#)
- Talked to program managers about risks inherent in their work__ [91](#)
- Conducted surveys to identify common and emerging ethics risks__ [18](#)
- Talked to employees about the ethics concerns they encounter in the workplace__ [91](#)
- Other

Describe: _____ [15 Table 32](#)

- My agency did not assess risk __ [26](#)

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 [87](#)
- Administered post-training evaluations to assess participants' perceptions of the training [46](#)
- Reviewed advice logs for increased activity after training presentations and communications [56](#)
- Held discussions with agency leaders and employees to evaluate whether the

training and communications they received supported them in managing ethics risks **62**

Ensured ethics education was accessible (508 compliant) to participants **58**

Other

Describe: _____ **5** [Table 33](#)

My agency did not evaluate the effectiveness of ethics education **29**

ADDITIONAL COMMENTS FOR PART 5. 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 2025. Rank 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: 12 agencies Second most frequent topic: 8 agencies Third most frequent topic: 14 agencies This topic was selected a total of 34 times
Gift acceptance Most frequent topic: 25 agencies Second most frequent topic: 25 agencies Third most frequent topic: 18 agencies This topic was selected a total of 68 times
Financial disclosure reporting Most frequent topic: 26 agencies Second most frequent topic: 26 agencies Third most frequent topic: 34 agencies This topic was selected a total of 86 times
Impartiality in performance of official duties Most frequent topic: 3 agencies Second most frequent topic: 4 agencies Third most frequent topic: 6 agencies This topic was selected a total of 13 times
Misuse of position, government resources, and information Most frequent topic: 1 agency Second most frequent topic: 2 agencies Third most frequent topic: 11 agencies This topic was selected a total of 13 times
Outside employment/activities Most frequent topic: 42 agencies Second most frequent topic: 32 agencies Third most frequent topic: 20 agencies This topic was selected a total of 94 times
Post-employment restrictions Most frequent topic: 24 agencies Second most frequent topic: 24 agencies Third most frequent topic: 21 agencies This topic was selected a total of 69 times
Travel, subsistence, and related expenses from non-federal sources

Most frequent topic: **3** agencies
 Second most frequent topic: **14** agencies
 Third most frequent topic: **12** agencies
 This topic was selected a total of **29** times

Other (specify) _____ [Table 35](#)
 Most frequent topic: **3** agencies
 Second most frequent topic: **4** agencies
 Third most frequent topic: **4** agencies
 This topic was selected a total of **11** times

25. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2025 (pursuant to 5 C.F.R. § 2635.602(a)): _____ **3,568**

26. Number of 18 U.S.C. § 208 waivers granted in 2025:

	Number Granted in 2025	Number Sent to OGE
a. 208(b)(1) waivers	249	249
b. 208(b)(3) waivers	102	161

If applicable, 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 2025 (pursuant to 5 C.F.R. § 2635.1007):

	Number Filed in 2025	Number Sent to OGE
a. Trust Document	0	0
b. Quarterly Reports	0	0
c. Termination Report	1	1

If applicable, 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	59 (56%)	41 (39%)	4 (4%)	1 (1%)	34
b. Confidential Filers	47 (44%)	51 (48%)	5 (5%)	4 (4%)	32

If not applicable, specify why: _____ [Table 39](#)

If “never” or “in some cases,” explain: _____ [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	57 (55%)	41 (39%)	6 (6%)	0 (%)	35

If not applicable, specify why: _____ [Table 41](#)

If “never” or “in some cases,” explain: _____ [Table 42](#)

30. Were all public and confidential financial reports, in calendar year 2025, filed using an electronic filing system?

- Yes, all reports were filed in an electronic filing system (*skip to #32*) **61**
- No **78**

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

- 450 (pdf) **73**
- 450 (excel) **8**
- 278e (pdf) **26**
- 278e (excel) **5**
- 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) **58 (42%)**
- Integrity* **and** Other **81 (58%)**

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

- Public Financial Disclosure (OGE Form 278e) **16**
Provide the name of the other system: _____ [Table 43](#)
- Periodic Transactions (OGE Form 278-T) **11**
Provide the name of the other system: _____ [Table 44](#)
- Confidential Financial Disclosure (OGE Form 450 or OGE-approved alternative form) **78**
Provide the name of the other system: _____ [Table 45](#)

34. Indicate your agency’s fiscal year 2025 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 fiscal year 2025	\$437,609 <input type="checkbox"/> Don't know/don't track 13	\$6,712,099 <input type="checkbox"/> Don't know/don't track 14	\$7,149,708
b. Amount paid to a federal agency in fiscal year 2025	0 <input type="checkbox"/> Don't know/don't track 13	\$ 1,808,605 <input type="checkbox"/> Don't know/don't track 16	\$ 1,808,605

c. Amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in fiscal year 2025	\$ 293,459 <input type="checkbox"/> Don't know/don't track 29	\$1,766,884 <input type="checkbox"/> Don't know/don't track 38	\$2,060,343
Total fiscal year 2025 actual costs	\$731,068	\$10,287,588	\$11,018,656

35. Indicate the number of filers who filed electronically in fiscal year 2025.

	Public (excluding filers in <i>Integrity</i>)	Confidential
Number of financial disclosure filers, not reports, who filed electronically in fiscal year 2025	4,205	360,361

ADDITIONAL COMMENTS FOR PART 7. Indicate the question number to which the comment corresponds. [Table 46](#)

PART 8. PUBLIC FINANCIAL DISCLOSURE

36. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2025, **excluding** SGEs, and the number of reports actually filed (i.e., received) by December 31, 2025.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	Required		768	991	1,857	2,056	5,672
	Filed		752 (98%)	983 (99%)	1,800 (97%)	2,003 (97%)	5,538 (98%)
b. Annual	Required	222	118	8,989	76	9,515	18,920
	Filed	222 (100%)	118 (100%)	8,955 (99.6%)	76 (100%)	9,476 (99.6)	18,847 (99.6%)
c. Termination	Required	441	788	2,495	1,627	2,546	7,897
	Filed	435 (99%)	783 (99%)	2,437 (98%)	1,605 (99%)	2,481 (97%)	7,741 (98%)
d. Combination ¹	Required	19	15	208	22	300	564
	Filed	19 (100%)	15 (100%)	202 (97%)	22 (100%)	295 (98%)	553 (98%)
Total	Required	682	1,689	12,683	3,582	14,417	33,053
	Filed	676 (99%)	1,688 (99.9%)	12,577 (99%)	3,503 (98%)	14,255 (99%)	32,679 (99%)

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

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ 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, 2025, 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, 2026, 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 2026 questionnaire response to be filed in 2027.

If applicable, explain discrepancies between the number of reports required to be filed and the actual number of reports filed: _____ [Table 47](#)

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 ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	How many reports did your agency certify or close in 2025?		623	993	1,497	1,884	4,997
	Of those certified or closed in 2025, how many were initially reviewed within 60 days?		592 (95%)	906 (91%)	1,427 (95%)	1,709 (91%)	4,634 (93%)
	Of those certified or closed in 2025, how many were certified or closed within 60 days?		438 (70%)	722 (73%)	1,147 (77%)	1,365 (72%)	3,672 (73%)
b. Annual	How many reports did your agency certify or close in 2025?	212	126	8,734	84	9,061	18,217
	Of those certified or closed in 2025, how many were initially reviewed within 60 days?	196 (92%)	103 (82%)	8,138 (93%)	79 (94%)	8,513 (94%)	17,029 (93%)
	Of those certified or closed in 2025, how many were certified or closed within 60 days?	184 (87%)	81 (64%)	6,984 (80%)	71 (85%)	7,085 (78%)	14,405 (79%)
c. Termination	How many reports did your agency certify or close in 2025?	420	769	2,238	1,610	2,261	7,298

	Of those certified or closed in 2025, how many were initially reviewed within 60 days?	400 (95%)	743 (97%)	2,134 (95%)	1,581 (98%)	2,151 (95%)	7,009 (96%)
	Of those certified or closed in 2025, how many were certified or closed within 60 days?	379 (90%)	681 (89%)	2,020 (90%)	1,520 (94%)	1,945 (86%)	6,545 (90%)
d. Combination ¹	How many reports did your agency certify or close in 2025?	19	14	199	23	291	546
	Of those certified or closed in 2025, how many were initially reviewed within 60 days?	19 (100%)	11 (79%)	181 (91%)	22 (96%)	278 (96%)	511 (94%)
	Of those certified or closed in 2025, how many were certified or closed within 60 days?	19 (100%)	6 (43%)	159 (80%)	22 (96%)	249 (86%)	455 (83%)
TOTAL	How many reports did your agency certify or close in 2025?	651	1,532	12,164	3,214	13,497	31,058
	Of those certified or closed in 2025, how many were initially reviewed within 60 days?	615 (94%)	1,449 (95%)	11,359 (93%)	3,109 (97%)	12,651 (94%)	29,183 (94%)
	Of those certified or closed in 2025, how many were certified or closed within 60 days?	582 (89%)	1,206 (79%)	9,885 (81%)	2,760 (86%)	10,644 (79%)	25,077 (81%)

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

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ 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, explain why some reports were reviewed more than 60 days after submission: _____ [Table 48](#)

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

- Additional information was being sought **60**
- Remedial action was being taken **17**
- Other **30**

Describe: _____ [Table 49](#)

38. Number of periodic transaction reports filed, **excluding** those filed by SGEs: **21,780**

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. Report the number of 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	5,912	367	76
b. Number of OGE Form 278-T Reports	574	434	129

40. Number of public financial disclosure filers reported in calendar year 2025 to the Attorney General for failure to file: _____ **0**
41. Number of requests for public financial disclosure reports received in 2025: Count each OGE Form 201 as one request, even if it contains a request for documents for multiple individuals: _____ **1,649**
42. Number of documents requested under the Ethics in Government Act released in calendar year 2025: _____ **7,920** Don't Know/Don't Track

ADDITIONAL COMMENTS FOR PART 8. Indicate the question number to which the comment corresponds. [Table 50](#)

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

43. Report the number of confidential financial disclosure reports required to be filed by December 31, 2025, **excluding** SGEs, and the number of reports actually filed by December 31, 2025.

	a. Required	b. Filed	
		OGE Form 450	334,283
		OGE-approved alternative form	46,214
Total	381,252		380,497(99.8%)

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, 2025, 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, 2026, the employee has not filed a new entrant report, do not count that report in your required numbers. Instead, include the report in your 2026 questionnaire response to be filed in 2027.

If applicable, explain discrepancies between the number of reports required to be filed and the actual number of reports filed: _____ [Table 51](#)

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 2025?	Of those certified or closed in 2025, how many were initially reviewed within 60 days?	Of those certified or closed in 2025, how many were certified or closed within 60 days?
a. OGE Form 450 and OGE-approved alternative	378,152	356,760 (94%)	342,187 (90%)

If applicable, explain why some reports were reviewed more than 60 days after submission: _____ [Table 52](#)

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

- Additional information was being sought **51**
- Remedial action was being taken **19**
- Other **38**

Describe: _____ [Table 53](#)

45. Number of OGE 450 or OGE-approved alternative forms granted filing extensions in 2025: _____ **15,150**

ADDITIONAL COMMENTS PART 9. Indicate the question number to which the comment corresponds. [Table 54](#)

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

46. Report the number of disciplinary actions taken in 2025 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	1,098
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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)	24
ii. Subpart B (Gifts from Outside Sources)	18
iii. Subpart C (Gifts Between Employees)	9
iv. Subpart D (Conflicting Financial Interests)	22
v. Subpart E (Impartiality in Performing Official Duties)	58
vi. Subpart F (Seeking Other Employment)	3
vii. Subpart G (Misuse of Position)	506
viii. Subpart H (Outside Activities)	82
ix. Subpart J (Legal Expense Funds)	0
x. Agency’s supplemental Standards of Conduct	193

47. Report the number of disciplinary actions taken in 2025 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	18
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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)	2
ii. 18 U.S.C. § 205 (Claims Against and Matters Affecting the Government)	2
iii. 18 U.S.C. § 208 (Acts Affecting a Personal Financial Interest)	12
iv. 18 U.S.C. § 209 (Supplementation of Salary)	0
v. 5 U.S.C. § 13106	0
vi. 18 U.S.C. § 1001 (Failure to File or Filing False Public Financial Disclosures)	0
vii. 5 U.S.C. § 13143 (Outside Earned Income)	3
viii. 5 U.S.C. § 13144 (Outside Activities)	1

48. Report the number of referrals made in 2025 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	141
---------------------------------------	------------

Of the referrals to DOJ (line a.), provide the status of each referral:

b. DOJ Referral Status	
i. How many of those referrals were accepted for prosecution?	8
ii. How many of those referrals were declined for prosecution?	121
iii. How many of those referrals were pending DOJ's decision as of December 31, 2025?	12

Of the referrals to DOJ (line a.), provide the status of any associated agency disciplinary action:

c. Agency Disciplinary Action Status	
i. Of the cases referred to DOJ, how many resulted in disciplinary or corrective action?	75
ii. Of the cases referred to DOJ, how many resulted in a determination not to take disciplinary or corrective action?	21
iii. Of the cases referred to DOJ, how many are pending a determination as to whether disciplinary or corrective action will be taken?	15
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?	28
v. Of the cases referred to DOJ, how many involved 18 U.S.C. § 207, such that there was no option for disciplinary action?	2

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

Yes **20**

No **5**

Explain why not: _____ [Table 55](#)

Not applicable because no covered referrals were made to DOJ **114**

ADDITIONAL COMMENTS FOR PART 10. Indicate the question number to which the comment corresponds. [Table 56](#)

PART 11. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

50. How many special Government employees (SGEs) did your agency have, in total, during calendar year 2025? _____ **33,470** (if zero, skip to Additional Comments for this Part)
51. 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, 2025 (5 C.F.R. § 2638.304(b)(2))?	26,844
i. How many of those SGEs received IET before or at the beginning of the first meeting?	25,308 (94%)
ii. How many of those SGEs received IET after the first meeting?	20 (>1%)
iii. How many of those SGEs have not received IET as of today?	1,516 (6%)

If applicable, explain why some SGEs received IET after the first meeting or have yet to receive IET: _____ [Table 57](#)

52. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2025, and the number of reports actually filed by December 31, 2025.

	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
a. Advisory Committee Members (FACA)	24,562	24,489 (99.7%)	15	15 (100%)
b. Advisory Committee Members (non-FACA)	339	302 (89%)	0	0
c. Experts/Consultants	331	301 (91%)	142	104 (73%)
d. Board Members	145	138 (95%)	18	14 (78%)
e. Commissioners	74	75 (101%)	9	9 (100%)
f. Other	1,209	1,207 (99.8%)	64	62 (97%)
TOTAL	26,660	26,512 (99%)	248	204 (82%)

Example for new entrant and termination reports: If an employee joined (or departed) the agency on December 15, 2025, 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 2026 questionnaire response to be filed in 2027.

If applicable, explain discrepancies between the number of reports required to be filed and the actual number of reports filed: _____ [Table 58](#)

53. Report 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 2025?	26,394	198
b. Of those certified or closed in 2025, how many were initially reviewed within 60 days?	26,366 (99.8%)	182 (92%)
c. Of those certified or closed in 2025, how many were certified or closed within 60 days?	26,294 (99.6%)	151 (76%)

If applicable, explain why some reports were reviewed more than 60 days after submission: _____ [Table 59](#)

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

- Additional information was being sought **21**
- Remedial action was being taken **4**
- Other **11**

Describe: _____ [Table 60](#)

54. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. § 2634.904(b): _____ **5,244**

55. Number of 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	58	6	0
b. Number of OGE Form 450 Reports or OGE-Approved Alternative Forms	76		

ADDITIONAL COMMENTS FOR PART 11. Indicate the question number to which the comment corresponds. [Table 61](#)

ADDITIONAL QUESTIONNAIRE COMMENTS: [Table 62](#)

APPENDIX

PART 4. PROGRAM RESOURCES AND ADMINISTRATION

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

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.
Admin supported by tracking filing and training requirements and notifying employees of ethics requirements.
Track filing and training requirements. Archive ethics review requests. Route requests for ethics advice.
Assign OGE Form 450 reports to reviewers.
Administrative support includes data entry, action tracking, and action communications.
Contractor assisted with financial disclosure tracking and other administrative tasks.
Standard form emails
Ethics training support, recordkeeping, and tracking, internal filer tracking, data entry, and customer support.
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.
Admin supported by tracking filing and training requirements and notifying employees of ethics requirements.
Track filing and training requirements. Archive ethics review requests. Route requests for ethics advice.
Assign OGE Form 450 reports to reviewers.
Administrative support includes data entry, action tracking, and action communications.
Contractor assisted with financial disclosure tracking and other administrative tasks.
Standard form emails
A contractor paralegal scheduled ethics briefings and other administrative tasks related to the ethics program.
Assisting with tracking filing and training requirements.
Track filing and training requirements. Archive ethics review requests. Route requests for ethics advice.
Administrative support includes data entry, action tracking, and action communications.

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

Include contractors who support legal central/LSD
The Bureau requires its confidential financial disclosure (OGE Form 450) filers to submit their reports via FDOonline, 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 has been supported by contractors.
The Agency utilizes FDOonline/Intelliworx-IT to support and manage the filing, certification, and storage of filed OGE 450 Reports.
DLA uses the Financial Management Disclosure System (FDM) run by the Army. We use contractors 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 an Ethics Counselor's live training session and converted it into a format that could be viewed on the Agency intranet page.
The Army uses contractors to support the operation of its Financial Disclosure Management System for OGE submission by Army filers.
IT support was provided in maintaining databases and developing agency-wide training products.
Develop and support database tools and electronic filing systems. Develop and maintain a web-based, user-friendly Ethics Dashboard. Develop applications and AI agents to assist in processing and reviewing ethics questions.
IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.)
Maintenance of case management system Development of employee resources website and SharePoint.
HUD uses FDOonline for OGE-450s.
FDOonline e-filing system and the Ethics Vetting Power application
We utilized IT contractor support to further develop and maintain several electronic platforms to support the agency's decentralized ethics program. For example, we developed a series of refinements to the ethics database platform that is used by ethics officials 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 begin work to launch a mobile ethics app for use by employees and the public.
Aside from maintaining normal computer-based operations for the ethics program, they also confirmed back-end IT security for Integrity and FD Online, the software we use for financial disclosure, and a few other applications.
The Farm Credit Administration (FCA) purchased licenses to use a software-as-a-service secure online program, FDOonline, for the collecting, reviewing, and records management of Confidential Financial Disclosure Reports, OGE Form 450s. Implementation of FDOonline began near the end of calendar year 2025 and is fully implemented for the 2026 financial disclosure filing season.
The Farm Credit Administration (FCA) provides information technology support to the Farm Credit System Insurance Corporation (FCSIC). The FCA purchased licenses, one of which is for a FCSIC employee, to use a software-as-a-service secure online program, FDOonline, for the collecting, reviewing, and records management of Confidential Financial Disclosure Reports, OGE Form 450s. Implementation of FDOonline began near the end of calendar year 2025 and is fully implemented for the 2026 financial disclosure filing season. Only one FCSIC employee files in FDOonline.
FDOonline for OGE 450 filing
FDOonline
We received IT support for FDOonline and the Ethics database.
The FTC uses FDOonline to file and review most confidential financial disclosure (OGE Form 450) reports.

Enhanced electronic OGE Form 450 (e-OGE Form 450) application and operational/maintenance support of the application.
FDOOnline
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. One location is developing an electronic ethics intake system.
OGE Form 450 e-filing system
Support electronic filing system (OGE 450s), maintain and enhance case management system, and update ethics SharePoint pages.
The NSF IT office is staffed by a mix of FTEs and contractors. Two IT contractors provided eFile support as needed. An additional contractor assisted 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.
White House IT personnel including contractors provide all necessary IT support, including for ethics related matters. There are no specific systems or support devoted to ethics used by PIAB.
Technical support from Intelliworx for FDOOnline.
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.
Helped us set up a "box" for employees on admin leave to securely submit 450s. Also set up folders on shared drive.
A contractor employee filmed an Ethics Counselor's live training session and converted it into a format that could be viewed on the Agency intranet page.
The Army uses contractors to support the operation of its Financial Disclosure Management System for OGE submission by Army filers.
IT support was provided in maintaining databases and developing agency-wide training products.
Develop and support database tools and electronic filing systems. Develop and maintain a web-based, user-friendly Ethics Dashboard. Develop applications and AI agents to assist in processing and reviewing ethics questions.
Maintenance of case management system Development of employee resources website and SharePoint.
FDOOnline e-filing system and the Ethics Vetting Power application
Enhanced electronic OGE Form 450 (e-OGE Form 450) application and operational/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. One location is developing an electronic ethics intake system.
The NSF IT office is staffed by a mix of FTEs and contractors. Two IT contractors provided eFile support as needed. An additional contractor assisted with computer-based ethics training modules.
Develop and support database tools and electronic filing systems. Develop and maintain a web-based, user-friendly Ethics Dashboard. Develop applications and AI agents to assist in processing and reviewing ethics questions.

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. One location is developing an electronic ethics intake system.

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

Provide initial review of financial disclosures draft advice for attorney review.
EOUSA: financial disclosure review
One location uses contractor support for outside activity request initial review.
Provide initial review of financial disclosures draft advice for attorney review.
EOUSA: financial disclosure review
One location uses contractor support for outside activity request initial review.
Provide initial review of financial disclosures draft advice for attorney review.
EOUSA: financial disclosure review
For approximately the first four months of 2025, Skillsoft/Percipio provided an inter-active government ethics course that the EEOC used for initial ethics training.
The Commission uses internet-based, interactive ethics course for initial and annual ethics trainings.
One location uses contractor support for outside activity request initial review.
Due to the inability to get another Federal agency DAEO to provide ethics support, the PBRB retained a private sector government ethics attorney to provide ethics guidance and training. The PBRB DAEO is not an attorney thus it was necessary to retain legal counsel on ethics matters.

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

Contractor staff runs reports and contacts Integrity helpdesk assists with systems analysis
DOI uses contractors to support the ethics program's confidential financial disclosure filing system and ethics mobile application.
Developing updated online ethics training for 2026.

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.

U.S. Department of Agriculture
Department of War
Department of the Army
US Dept. of Agriculture (USDA)
Office of Administration, Executive Office of the President
Office of Administration, Executive Office of the President
1. Department of War Standards of Conduct Office (SOCO). 2. Army Office of General Counsel (OGC). 3. Air Force OGC.
The Army has an agreement with GSA for the provision of log-in services to the Financial Disclosure Management System via login.gov.
1. U.S Army, Executive Agent for the Financial Disclosure Management (FDM) electronic filing system 2. DoD Standards of Conduct Office (SOCO)

General Services Administration, Health and Human Services
U.S. Army
Office of Special Counsel (OSC) and Office of Director of National Intelligence (ODNI)
Department of the Army
Farm Credit Administration (FCA)
USDA/NASA
USDA
Department of Interior - Interior Business Center
Department of Treasury, Bureau of Fiscal Services
Department of the Army
DoD Standards of Conduct Office and ODNI.
The Office of White House Counsel formally took over ethics responsibilities for the NSC in September 2025. White House Counsel's ethics program is supported by detailees from the Commodity Futures Trading Commission, U.S. Patent and Trademark Office, and the U.S. Army.
Bureau of the Fiscal Services within the Department of Treasury
Executive Office of the President, White House Counsel's Office
WHCO, OA, OSC, and OGE
USDA
Central Intelligence Agency
White House Counsel's Office
USTR's two full-time ethics officials departed in August 2025. Since that time, the Ethics Office at the Department of Treasury has been supporting USTR until we can hire a backfill. A Deputy General Counsel currently serves as the USTR POC and coordinates employee requests for assistance with Treasury.
White House Office
Department of the Army
Office of the White House Counsel Office of General Counsel for Office of Administration
United States Navy Reservist served as the Alternate Designated Agency Ethics Official (ADAEO). The Reservists assignment to the Agency expired prior to the end of the calendar year, and thus ADAEO will be filled by an Agency career appointee in 2026.
Department of Housing and Urban Development
Commodity Futures Trading Commission U.S. Patent and Trademark Office U.S. Army

Table 6: Q.6 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.

Annual supervisor training module
Ethics advice & guidance
The ASBCA's GS employees are hired via the Army's civilian personnel system. The Army provides prospective GS employees with required ethics notices. However, none were issued in 2025 because the ASBCA did not hire any GS employees during the calendar year. Conversely, the ASBCA provides prospective administrative judges with required ethics notices.
The Agency utilized USDA's Ethics Simulation/Training Game - "Meals to Mars" - to support make-up training for individuals that could not attend live sessions of Annual Ethics Training offered.
Support was received in the form of providing and initial review of financial disclosures

Provides employment notices to new employees, including supervisors, and ethics training for political appointees.
1. SOCO provided Department-wide guidance at monthly coordination meetings for Department 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 the Department's use of the Financial Disclosure Management (FDM) System, and the Army OGC provided user support to us throughout the year. 3. Army and Air Force OGC POCs provided assistance in the assignment and completion the Office of Government Ethics (OGE) Form 278 Public Financial Disclosure Reports.
Log-in services to the Financial Disclosure Management System vial login.gov.
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 and DoD Directive 5500.7, legal advisories, and regularly coordination group meetings of DoD ethics officials.
Reviewing 278 nominee reports, providing initial ethics briefing for appointees, providing initial ethics training for new employees and SGEs serving on boards and committees, training for ethics staff on all areas of running the ethics program and use of Integrity, reviewing 278 reports, reviewing some 450 reports, evaluating conflicts for current and former employees
Financial Disclosure Management System (FDM) for OGE 450 filings.
Guidance under the Hatch Act (OSC) and Guidance under 50 USC 3073a and related directives (ODNI)
Subscription Use of Financial Disclosure Management System (FDM)
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 his team, provides ethics program management and services to FCSIC, including advice and counseling to FCSIC employees.
The agency used the USDA/NASA annual ethics training, made available to all agencies, to satisfy the interactive training requirement.
Utilized the USDA Ethics training module
HR contracting service for the agency.
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.
Archive access to FDM, NCUA's prior OGE Form 450 e-filing system (access ended CY2025)
Ethics policy, post-government employment issues and public financial disclosure reporting support.
General support of all aspects of the ethics program.
Provides ethics notices in offer letters to new hires
Ethics consultations
WHCO: shared ethics guidance with OSTP DAEO and ADAEO Office of Administration (OA): provided platform for virtual ethics training (initial and annual and human trafficking awareness) OSC: provided Hatch Act training OGE: provided ethics guidance to OSTP ADAEO
Director of USDA Ethics provided live annual ethics training.
Ethics Compliance Tracking System
White House Counsel's Office provided routine ethics guidance.
Program management, financial disclosure, ethics training, and advice and counsel.
The White House Counsel's Office provided support and partnership on new employee initial ethics trainings.
We worked with the Army to continue using the Financial Disclosure Management (FDM) system for our confidential financial disclosure report filers.
Informal legal support as questions arise, particularly during periods of legal staff/DAEO turnover.

Provided support by reviewing financial disclosures.
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 drafted 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. However, USICH was effectively shut down in April 2025. At the end of 2025, two employees remain for orderly shutdown but otherwise are not performing any work.
Provided detailees to support the ethics program.

Table 7: Q.8 Did your agency provide ethics program services or support for any board, commission, or agency that is independent of your agency?

SOCO
Defense Technical Information Center (DTIC) and Defense Standardization Program Office
Defense Health Agency (DHA)
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.
National Assessment Governing Board (NAGB) and National Council on Disabilities (NCD)
Department of Education
Office of the Vice President
United States Interagency Council on Homelessness
The Upper Colorado River Commission (UCRC) an interstate water administrative agency established by action of five state legislatures and Congress.
Metropolitan Washington Airports Authority (MWAA)
Office of the U.S. Trade Representative (Oustr)
Farm Credit System Insurance Corporation (FCSIC)
The U.S. Department of Education
Public Interest Declassification Board
DoD Standards of Conduct Office.
WHCO, OA, GAO
Social Security Advisory Board (SSAB)
Secretary of Defense's USU Board of Regents
Executive Residence

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

The Ethics Program provided a GS14 detailee to SOCO for three months.
DLA provides advice, training, and financial disclosure reviews and certifications.
DHA - ethics advice to medical group commanders.
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.
Advice, counseling, ethics training and financial disclosure review and certifications.
HHS has operated under an MOU with the Department of Education (ED) to assist with shepherding Presidential nominees through that process. We have also provided training and support to ED's new ethics team after ED's former ethics team was placed on admin leave subject to RIF actions.
Provided 2 attorney detailees to serve as Deputy Ethics Counsel
HUD manages USICH's ethics program. However, USICH was effectively shut down in 2025.
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, prior to the Chair's resignation in January 2025.
Reviewed the confidential disclosure report of an MWAA Board of Directors nominee as a courtesy
Oustr lost its two ethics officials in August 2025. Starting in September 2025, the Treasury Departmental Office (DO) Ethics Office has been providing full support to Oustr until they can backfill the ADAEO position.
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 his team, provides ethics program management and services to FCSIC, including advice and counseling to FCSIC employees.
Agreement to (1) review and process the backlog of Public Financial Disclosure Reports (OGE Form 278) and Confidential Financial Disclosure Reports (OGE Form 450), and (2) provide training to ethics officials as needed.
NARA 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.
Data Call input and policy review.
Some of the OSTP staff who had initially onboarded at OSTP but immediately transitioned to WH Office met with WHCO and OSTP to receive their initial ethics training. OSTP DAEO and ADAEO led the initial ethics training. OA requested to meet with OSTP DAEO for ethics guidance at the beginning of the Administration. GAO asked for OSTP OGC's ethics briefing and process provided to departing CFIUS employees.
Ethics review of financial disclosure reports, annual ethics training, and ethics advice for conflicts.
Legal and ethics support (financial disclosure, ethics training, ethics counseling)
The White House Office historically provides ethics support to the Executive Residence, a separate component within the Executive Office of the President.

Table 9: Q.9 Does your agency's ethics program need additional resources? Select all that apply.

Agency ethics officials could use some upgraded training modules for delivering training.
Our agency is always looking for more training opportunities, especially all-encompassing training for newer ethics officials and paralegals. Additionally, having our Financial Management Disclosure system auto-generate cautionary notices would save a lot of time during OGE 450 reviews.

Budgetary. USDA's Office of Ethics is the sole office administering USDA's Department-wide Ethics program servicing all USDA employees. USDA's Office of Ethics had its budget cut by 20% in the Fiscal Year (FY) 2024 budget. This 20% cut was continued in the Office of Ethics' FY 2025 and FY 2026 budgets.
Due to RIF actions and other employee departures, many ethics teams throughout the Department are operating with fewer staff, including staff who are new to working with the ethics program. Thus, many teams report not just that they could benefit from more staff, but specifically staff with prior ethics experience. They also report a need for technology solutions that could make up for the loss in support staff. Finally, they report that additional funding could help them with the first two needs.
Budget.
Budgetary (ATF). Many components request more full-time ethics officials (Human Capital) to assist with the increasing volume of complicated ethics questions and issues. Components with large financial disclosure programs request more ethics officials to assist with timely review of reports. Technology resources are requested by most components, particularly those with large financial disclosure programs, such as a system like Integrity for OGE Form 450 collection and review. The FDOonline system has limited use in DOJ because of its cost, and its consideration for purchase by more components is on hold due to budget constraints.
Funds for: a) new OGE-450 report review software (FDOonline), plus migration and training on OGE-450 platform and b)to provide in-person ethics and FD training to locations outside of Metro DC area.
The DEO needs additional budgetary support for various ethics program activities and functions.
In CY 2025, hundreds of EPA employees accepted deferred resignation or left federal service. More than half of the ethics officials are no longer performing ethics functions. The EPA Ethics office itself lost a senior ethics attorney to retirement in CY 2025 as well as a detailee, effectively reducing our staff level by 17%. We still had to meet the burgeoning needs of employees contemplating deferred resignation (while still subject to the ethics rules while on administrative leave), outside activity (during administrative leave or the prolonged federal shutdown), and seeking and post-employment. We also dealt with unprecedented new issues such as approval of pro bono legal services and union issues. In CY 2025, EPA terminated most of its union contracts, which required counseling on the implications of 18 USC 205, particularly in light of EO 14251 that excluded EPA from federal labor management relations programs, thus affecting whether we could apply the 1996 amendments to the law.
IT services (e.g., developing electronic filing systems for financial disclosure, new employee document signatures, and tracking training. or Administrative support (e.g., tracking filing or training requirements, outreach, data entry, etc.) Other ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.)
As a small agency with 5 FTEs, we welcome OGE's guidance on initial ethics training for new employees and annual ethics training.
Training materials and informational materials on common ethics topics

Table 10: Q.10 Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2025?

New program.
The president of USADF left the agency in February 2025. All members of the Board of Directors were removed in 2025 before a new president could be appointed. There was an ongoing district court case (RDI v. Marocco) that challenged the legality of the new leadership of USADF. Most of the staff, including the DAEO and ADAEO) were put on administrative leave and then RIFed in March and April

2025. Following a district court injunction, staff were brought back late July/August. Staff lost access to all official accounts and systems in December 2025. As of December 31, 2025, there were no Senate confirmed members of USADF's Board of Directors, no president appointed by the Senate confirmed Board of Directors, and no DAEO.

Table 11 Q.12:What kind of changes resulted from the evaluation? (Programmatic)

Our ethics program addressed several areas needing improvement- mainly around the state of the agency annual briefing and proper statements and data being posted to our website.
Increased investment in new technology resources
Additional funding and identification of additional hiring needs for upcoming years
CFTC Ethics has entered into an MOU with the agency Human Resources Branch, which will further strengthen compliance with 5 C.F.R. Section 2638.105. We also improved the capacity for data driven analysis of the ethics program by implementing business rules and reports in an existing agency workload management database. Additionally, CFTC Ethics staff continues to update our program documents to ensure that they are current.
The Bureau's Ethics Office decided to deliver mandatory interactive annual ethics training in a format different from that used in previous years. The primary goal of this change was to provide employees with the flexibility to complete the training according to their schedules, within a defined time period.
Programmatic Changes: The Agency ethics team updated its Annual Ethics Training, and reduced the number of AET sessions we provided in order to encourage efficiency in delivery. The Agency updated guidance on ethics resources during the Deferred Resignation Program. Policy Changes: The Agency is in the middle of a broader policy updated process which will include additional updates to ethics policies, including staffing changes that affect financial disclosure and training requirements with the Office of Human Capital.
In 2025, reconfigured its ethics staff with a newly appointed DAEO and new ethics officer, and reduced the size of the ethics team to adjust to the decrease in the size of the agency.
As part of DCAA's Risk Management and Internal Control Program, the Office of the General Counsel's Accountable Unit Manager assessed the risk associated with the Ethics Program and tested the effectiveness of internal controls. No risks were indicated that warranted programmatic changes.
(1) The Chief Ethics Officer began receiving bi-weekly updates on personnel actions for public financial disclosure filers, which facilitates the timely identification of new and departing filers. The Ethics Program also continues to sync monthly with the SES Program Manager to obtain additional visibility into impending personnel moves. (2) The Ethics Program streamlined the management of confidential financial disclosure filers in FDM by auditing our list of FDM POCs across the Agency, requesting organizations appoint replacement POCs for those who departed in CY25, and providing updated training on FDM to all POCs. This initiative was critical to maintaining accurate filer information after the loss of approximately 10% of the Agency's workforce through the Deferred Resignation Program (DRP) and Voluntary Early Retirement Authority/Voluntary Separation Incentive Payments (VERA/VSIP), including the Ethics Program manager who had primary responsibility for the management of FDM. (3) To improve our data management capabilities (e.g., tracking requests for ethics advice, advice rendered by ethics officials, and compliance metrics), the Ethics Program planned to begin beta testing for FDM ETHOS, an ethics disclosure/compliance tool developed by SOCO. However, this initiative was paused due to the significant loss of Ethics Program personnel in CY25.
We recognized that we to put our adoption of the federal standards of conduct into writing. We are working an instruction that will do this.

<p>The DAEO makes programmatic and policy changes as needed during bi-weekly DAEO meetings. Loss of the ethics program manager to retirement and the administrator to DRP caused us to change the way we operate (see comment below). The incumbent DAEO also retired and ADAEO assumed DAEO duties. Worked extensively with HCM on ensuring individuals who took DRP understood that ethics rules still applied to them. Created handouts and postings on website.</p>
<p>DoD IG audited timeliness of submission/review of public financial disclosure reports of senior DoD officials. The DoD IG found that DoD ethics officials performed consistent and timely reviews of senior DoD officials financial interests and addressed potential conflicts of interest between official duties and the financial interests of DoD filers. Other internal reviews by agencies/commands resulted in improved processes/procedures for financial disclosure filing and ethics training.</p>
<p>Development of program-specific ethics SOP.</p>
<p>One program has implemented a clearance process before expert/consultant SGEs are onboarded, increased communications with all filers, and has worked to increase presence and visibility at meetings and briefings. One program improved overall processes and procedures and developed an integrated case management system. One program improved tracking methods for IET and AET. One other program's evaluation has not been completed.</p>
<p>Changes to training and administrative practices.</p>
<p>Programmatic changes- DEO: piloting of E2 Solutions system for gifts of travel expense reimbursement, enhanced Form 201 response process, new Fact Sheets. BOP: updated confidential financial disclosure designations. EOUST: began transition to e-filing for confidential financial disclosure, updated procedures and materials for employee offboarding. Policy changes-DOJ Ethics Order 1000 was enacted by the DAEO on 1/23/2025. DEO: Updated conflicts guidance for JMD on stock holdings in IT companies, guidance on ethics rules applicability to participants of the Deferred Resignation Program (DRP). CRT: updated IPA guidance. CRM: recommendations still being considered.</p>
<p>As a result of the evaluations, the DEO updated ethics program support resources, training, and guidance for employees seeking and negotiating employment and offboarding employees. The DEO also implemented a standardized tracker for program compliance with regulatory requirements.</p>
<p>Rebalance of ethics duties among the ethics team</p>
<p>Deferred resignations and reorganizations throughout EPA significantly affected EPA's decentralized ethics program. Because of these systemic changes, EPA Ethics had to: (a) take over providing ethics advice to organizations that lost their ethics officials, (b) finetune our ethics dashboards to be able to provide more specific and detailed information about confidential filers so that new ethics officials could better track compliance and (c) revamp our approach to providing employees with ethics resources. For example, although the EPA ethics site is internal facing only, we recognized that we needed to find a way to provide information to people who did not have access to EPA internal systems. We therefore worked with another office to post outward facing ethics information for employees in administrative leave and deferred resignation. We also procured funding to provide EPA employees with an ethics mobile app that will be launched in CY 2026. We also provided multiple training webinars about ethics and the DRP throughout CY 2025 that reached over two thousand employees.</p>
<p>The Office of Ethics and Compliance continuously monitors and evaluates the Ethics Program during weekly team meeting. EXIM OIG conducted inquiries concerning Ethics policies (STOCK Act notices) and the Annual Financial Statement Audit done by KPMG includes review of the Annual Ethics Training Plan and results of previous year's OGE Annual Questionnaire. Minor, expected changes to operations as conditions change. Such as--the Ethics Office can update Protocol Office shared gift</p>

spreadsheet now instead of just Protocol, for convenience and efficiency based on practice experience.
The Ethics Office in coordination with the FCA Office of Information Technology evaluated the SharePoint process used to collect, review, and certify Confidential Financial Disclosure Reports, OGE Form 450s, and determined that improvements were necessary for efficiency. As a result of this evaluation, the FCA purchased licenses to use a software-as-a-service secure online program, FDOOnline, for the collecting, reviewing, and records management of OGE Form 450s. Implementation of the use of FDOOnline for OGE Form 450s began near the end of calendar year 2025 and is fully implemented for the 2026 financial disclosure filing season.
The Ethics Office in coordination with the FCA Office of Information Technology evaluated the SharePoint process used to collect, review, and certify Confidential Financial Disclosure Reports, OGE Form 450s, and determined that improvements were necessary for efficiency. As a result of this evaluation, the FCA purchased licenses to use a software-as-a-service secure online program, FDOOnline, for the collecting, reviewing, and records management of OGE Form 450s. Implementation of the use of FDOOnline for OGE Form 450s began near the end of calendar year 2025 and is fully implemented for the 2026 financial disclosure filing season.
Programmatic changes included replacing departed deputy ethics counselors for specific offices/divisions and providing additional resources for deputy ethics counselors. The Ethics Unit developed and implemented supplemental ethics training in 2025 for identified procurement and acquisitions staff. The Ethics Unit also evaluated ways to provide additional ethics support to divisions/offices within the agency.
The Ethics Office's review of its program resulted in changes to improve effectiveness, such as posting resources on its internal agency website, creating new trainings on areas of identified risk, and instituting periodic follow-ups on previously approved outside activities of a longer duration.
Formal Ethics Program SOP created, issued, and updated as appropriate.
The ethics office rolled out a new electronic OGE 450 filing system in conjunction with the Office of Human Capital and reviewed and evaluated the system. Ongoing programmatic changes and updates have been made to the system and its deployment.
Updated internal ethics guidance handouts and intranet site for employees. Also enhanced coordination with Human Resources re: new employee and post-employment ethics trainings, along with financial disclosure filing determination process.
Programmatic changes: Updated post-employment guidance, outside employment guidance, and offboarding process. Policy changes: Updated Ethics Office internal policies and procedures for review of financial disclosure reports, training, conflict of interest, and recusal guidance.
In accordance with the Assistant GC for Ethics' efforts in updating the financial disclosure templates and training materials, the Project Director managing the electronic filing program is identifying and developing improvements to further automate functions.
Established written policies and procedures.
Updated agency ethics directive to (1) clarify contractor obligations, (2) specify process when General Counsel is the DAEO and when General Counsel is not the DAEO, (3) clarify that not every administration has an ethics pledge, (4) update titles of personnel required to file financial disclosure reports, and (5) clarify electronic recordkeeping policy.
We strive for continuous improvement. In 2025 that included enhancements to the OMB Ethics Portal and special training for individuals and offices with particular needs.
Migration of all confidential financial disclosure reports to the electronic Financial Disclosure Management (FDM) system in 2025.

<p>My agency: Updated some ethics guidance and created new Standard Operating Procedures (SOPs), and provided additional ethics resources to staff. 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. OSTP B&A and ethics officials created and launched a new external events review system which now requires staff to complete their outside activities request online for ethics clearance.</p>
<p>The DAEO and OGC evaluated ONCD's ethics program and developed a process to streamline speaker engagement approvals. A form was developed that included ethics guidance for speakers to ensure that each speaker was aware of the ethics rules and regulations prior to participating in speaking events.</p>
<p>Update the Standard Operating Procedures for Financial Disclosure filings, including but not limited to an update to the positions that require a 450 filing. 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.</p>
<p>Recognized need for appointment of DAEO and ADAEO to conduct further assessments in CY26 DAEO and ADAEO were appointed and began review of program, policies, and procedures.</p>
<p>Due to resource requirements, the agency appointed an additional alternate-DAEO to provide ethics advice during the absence of the regular A/DAEO and retains that individual as an additional A/DAEO to assist as needed with the ethics program. Additionally, the agency created a new tracker specific to confidential and public financial disclosure filers. Finally, processing a FOIA request for records associated with Presidentially appointed and Senate confirmed employees helped the agency identify an ethics document that OGE had not uploaded to its public-facing ethics documents collection for one Board Member. OGE quickly resolved the issue once identified.</p>
<p>Updated procedures, positions for financial disclosure filings</p>
<p>Programmatic changes: Procedural changes to outside activities review system. Policy changes: Updates to outside activities policy.</p>
<p>The Postal Service Ethics and Compliance team analyzed statistics of the most frequent types of misconduct at the Postal Service derived from Office of Inspector reports of investigation. The DAEO then met with the agency head, discussed the statistics, reached a consensus on the areas of focus for the next fiscal year, and then obtained approval to deliver in-person communications and ethics training at facilities with the most misconduct. In 2025, the Postal Service Ethics and Compliance team drafted internal guidance memoranda on the following topics: an ethics expert legacy chart that explains how certain ethics issues are analyzed the Hatch Act guidance charts for reviewers and certifiers of OGE Form 450s and OGE Form 278s and ethics program responsibility requirements. These memoranda will provide guidance to team members and assist us in analyzing complex ethics issues.</p>
<p>Established written policies and procedures.</p>

Table 12: Q.12 What kind of changes resulted from the evaluation? (Policy)

<p>Programmatic Changes: The Agency ethics team updated its Annual Ethics Training, and reduced the number of AET sessions we provided in order to encourage efficiency in delivery. The Agency updated guidance on ethics resources during the Deferred Resignation Program. Policy Changes: The Agency is in the middle of a broader policy updated process which will include additional updates to ethics policies, including staffing changes that affect financial disclosure and training requirements with the Office of Human Capital.</p>

MOA with human resources to improve notice of new 450 filers
Policy manual was created and the head of the agency was designated the DAEO
The DAEO makes programmatic and policy changes as needed during bi-weekly DAEO meetings. Loss of the ethics program manager to retirement and the administrator to DRP caused us to change the way we operate (see comment below). The incumbent DAEO also retired and ADAEO assumed DAEO duties. Worked extensively with HCM on ensuring individuals who took DRP understood that ethics rules still applied to them. Created handouts and postings on website.
One program has implemented a clearance process before expert/consultant SGEs are onboarded, increased communications with all filers, and has worked to increase presence and visibility at meetings and briefings. One program improved overall processes and procedures and developed an integrated case management system. One program improved tracking methods for IET and AET. One other program's evaluation has not been completed.
Programmatic changes- DEO: piloting of E2 Solutions system for gifts of travel expense reimbursement, enhanced Form 201 response process, new Fact Sheets. BOP: updated confidential financial disclosure designations. EOUST: began transition to e-filing for confidential financial disclosure, updated procedures and materials for employee offboarding. Policy changes-DOJ Ethics Order 1000 was enacted by the DAEO on 1/23/2025. DEO: Updated conflicts guidance for JMD on stock holdings in IT companies, guidance on ethics rules applicability to participants of the Deferred Resignation Program (DRP). CRT: updated IPA guidance. CRM: recommendations still being considered.
As a result of the evaluations, the DEO updated ethics program support resources, training, and guidance for employees seeking and negotiating employment and offboarding employees. The DEO also implemented a standardized tracker for program compliance with regulatory requirements.
At DO, GAO was looking into the CFIUS program generally (Committee on Foreign Investment in the United States), which Treasury chairs part of that investigation was how the post-government employment rules affected those employees who worked on CFIUS matters. GAO has not issued its final report, but no negative findings or changes were recommended in the draft released to the agency for comment regarding the ethics function. At TIGTA, an internal review was conducted and policy changes were made to reflect revisions to Agency designations of positions as confidential filers. At TTB, revised annual ethics training from a live PowerPoint lecture format to a recorded narrative format (ethics officials discussing specific scenarios to increase engagement).
Deferred resignations and reorganizations throughout EPA significantly affected EPA's decentralized ethics program. Because of these systemic changes, EPA Ethics had to: (a) take over providing ethics advice to organizations that lost their ethics officials, (b) finetune our ethics dashboards to be able to provide more specific and detailed information about confidential filers so that new ethics officials could better track compliance and (c) revamp our approach to providing employees with ethics resources. For example, although the EPA ethics site is internal facing only, we recognized that we needed to find a way to provide information to people who did not have access to EPA internal systems. We therefore worked with another office to post outward facing ethics information for employees in administrative leave and deferred resignation. We also procured funding to provide EPA employees with an ethics mobile app that will be launched in CY 2026. We also provided multiple training webinars about ethics and the DRP throughout CY 2025 that reached over two thousand employees.
The Office of Ethics and Compliance continuously monitors and evaluates the Ethics Program during weekly team meeting. EXIM OIG conducted inquiries concerning Ethics policies (STOCK Act notices) and the Annual Financial Statement Audit done by KPMG includes review of the Annual Ethics Training Plan and results of previous years OGE Annual Questionnaire. Minor, expected changes to

operations as conditions change. Such as--the Ethics Office can update Protocol Office shared gift spreadsheet now instead of just Protocol, for convenience and efficiency based on practice experience.
The Agency drafted an outside activity and employment policy in 2025 that was not issued until the beginning of 2026.
We received a recommendation to ensure that older ethics files were removed from our records. That was a good reminder for us and the agency head and DAEO ensured that our administrative procedures were updated to reflect this requirement.
Programmatic changes: Updated post-employment guidance, outside employment guidance, and offboarding process. Policy changes: Updated Ethics Office internal policies and procedures for review of financial disclosure reports, training, conflict of interest, and recusal guidance.
Updated agency ethics directive to (1) clarify contractor obligations, (2) specify process when General Counsel is the DAEO and when General Counsel is not the DAEO, (3) clarify that not every administration has an ethics pledge, (4) update titles of personnel required to file financial disclosure reports, and (5) clarify electronic recordkeeping policy.
My agency: Updated some ethics guidance and created new Standard Operating Procedures (SOPs), and provided additional ethics resources to staff. 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. OSTP B&A and ethics officials created and launched a new external events review system which now requires staff to complete their outside activities request online for ethics clearance.
Due to resource requirements, the agency appointed an additional alternate-DAEO to provide ethics advice during the absence of the regular A/DAEO and retains that individual as an additional A/DAEO to assist as needed with the ethics program. Additionally, the agency created a new tracker specific to confidential and public financial disclosure filers. Finally, processing a FOIA request for records associated with Presidentially appointed and Senate confirmed employees helped the agency identify an ethics document that OGE had not uploaded to its public-facing ethics documents collection for one Board Member. OGE quickly resolved the issue once identified.
Programmatic changes: Procedural changes to outside activities review system. Policy changes: Updates to outside activities policy.
General policy updates

Table 13: Q.12 What kind of changes resulted from the evaluation? (No Changes)

In September 2025, the DoW OIG concluded a multi-year investigation into OGE 278 Periodic Transaction Reports. The primary purpose of this audit was to determine whether public financial disclosure reports of senior DoW officials were submitted and reviewed in a timely manner. The DoW OIG also assessed whether DoW ethics officials took appropriate actions to identify and address potential conflicts of interest in public financial disclosure forms. The investigation looked into thousands of OGE 278Ts across the Department that were filed during a 17-month period, including those from DIA. The final report of investigation concluded that all DoW ethics personnel reviewed 278Ts appropriately and took appropriate action, as needed. No recommendations were made in the final DoW OIG Report of Investigation. All findings showed satisfactory submission and review of OGE 278Ts.
No specific changes recommended.
No changes were identified as being needed.

The results affirmed that the ethics office is compliant with providing training to covered employees throughout the DON.
We determined that our Ethics program could use more staff to assist with running the program. However, the past year has made that kind of change unlikely.
Review determined that main hurdles to the program in FY25 were unanticipated and outside the control of the agency, therefore no changes were recommended at this time.
NASA's ethics practice continually evaluates NASA's ethics program through proactive feedback. This past year's ongoing evaluation resulted in improved compliance in the timely review of financial disclosure forms, at a rate of almost 90% and 99% for public and confidential forms, respectively. This was accomplished despite an increased ethics workload from agency-wide departures (e.g., outside activities advice, post-employment counsel), while the size of the OGC ethics practice also decreased. Our improved compliance was in part due to the launch of a new interactive and innovative online program in partnership with the U.S. Department of Agriculture, which enabled an additional option for the agency to satisfy annual and onboarding training requirements (e.g., 99% annual compliance).
Agency ethics program assessed and confirmed compliance with OGE requirements and overall agency needs.
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 changes required.
The review concluded that the ethics program was functioning smoothly.
Ethics office compliance with internal controls and procedures were evaluated and no deficiencies were noted.
As part of the Green Book audit, we provided information on initial ethics training and annual ethics training to an outside audit firm. No changes were made because we met the requirements of the audit.
The evaluation did not raise any concerns.

Table 14: Q.12 What kind of changes resulted from the evaluation? (Not applicable)

None

Table 15: Q.13 Of the following required written procedures, which did you have in place? Select all that apply.

Reviewing requirements to identify needs.
We are working to update policies and procedures for our ethics program.
Due to the presidential transition, OVP did not have finalized formal procedures in place in 2025, but is actively working on finalizing procedures for 2026.

Table 16: ADDITIONAL COMMENTS FOR PART 4. Indicate the question number to which the comment corresponds.

The employees identified as working "less than 1 hour per week" are the attorneys and paralegals who support financial disclosure program for a limited time during the filing season.
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<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 initial ethics training (5 C.F.R. 2638.304), Issuance of ethics notice to new supervisors (5 C.F.R. 2638.306)</p>
<p>Throughout most of CY2025 the Commission did not have a confirmed chairman and for much of the year only had one of five commissioners. The ADAEO communicated regularly with the Acting Chair and the General Counsel to advise them on both strengths and areas of risk in the Commission's compliance with programmatic requirements. This regular contact allowed for timely dissemination of ethics guidance to employees on both routine and unprecedented matters, such as Deferred Resignation Program, RIF and Government shutdown.</p>
<p>#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.</p>
<p>2. DeCA has previously reported the TOTAL number of employees and not just the number of FULL TIME employees. The FULL TIME employee count is 7,264 employees. PART TIME employees is 4,357 for a TOTAL employee count of 11,621.</p>
<p>11. Following OGE program review, the DAEO/ethics office conducted in internal review of ethics positions and consolidated ADAEO and Deputy DAEO responsibilities in a single position for efficiency. 12. Other than the two (2) recommendations identified during the Ethics Program review conducted by OGE, no additional changes were recommended or made based on the review conducted by the Accountable Unit Manager.</p>
<p>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 & staff supporting the program. Unfortunately, DISA OGC overall lost 25% of its staff to DRP & VERA/VSIP with the Administrative Law & Ethics Team losing 60%, to include the Ethics Program Manager (PM), the Associate General Counsel for Administrative Law & Ethics, and a GS-12 attorney.</p>
<p>Question 2: The number of DIA employees listed in this report reflects the most recently published unclassified number of DIA employees worldwide.</p>
<p>DLA follows the procedures written within the Joint Ethics Regulation regarding the timely filing, review, and public availability of reports.</p>
<p>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 20 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 2025 enacted budget. The FY 2025 budget continued a 20% cut to the Office of Ethics (OE) already small budget as compared to FY 2023 (OE's budget was \$5.556 million in FY 2023 and was cut to \$4.5 million for FY 2024, a figure continued in 2025). This 20% reduction in funding doesn't include the effects of separate government-wide salary pay increases for Federal employees. 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% and cannot replace two ethics advisors who departed under the Deferred Resignation Program (DRP). These budget reductions threaten the continued sustainability of USDA's Department-wide Ethics Program. Without additional funding in the FY27 budget the Office of Ethics cannot afford its current staff, to say nothing of backfilling the two advisor positions that are vacant as a result of the DRP. Simply put, the significant budget cuts to Ethics Program imperil an already significantly understaffed Ethics Program that services 100,000 USDA employees across the country.</p>
<p>#5 - Our Ethics Program manager retired in January, so he had one month of full time work. The Program Administrator resigned under the DRP at the end of April so she had 4 months of full time</p>

work. We did not include these employees in #5. The DAEO retired in June, so he had 1-10 hours for 6 months. These numbers are in addition to the numbers in #5.
Q.6 - Only three organizations utilized contractor support for substantive ethics work. Q. 11 - DoD SOCO conducts Program Assist Visits/Reviews of each DDAEO agency/command approximately every 4 years.
Due to agency reorganization, the entire OGC Ethics Division was placed on administrative leave pending RIF on March 11, 2025. For the rest of 2025, the new ethics team attempted to triage ethics compliance, but all aspects of the ethics program experienced backlogs and delays.
#2 - a component inadvertently omitted a category of FT employees from their submission in CY2024. CY 2025 response now accurately reflects the total # of FT employees.
Q5: Numerous ethics officials departed DOJ in CY2025 (e.g. DRP, RIF, agency reorg, retirement). Since they performed ethics duties during the year before they left, they are included in these counts. Q10: EOUSA Component Head communicated via letter to all ethics advisors thanking them for their service and emphasizing the importance of their work.
Q2. FTEs as of end of Pay Period 25 (12/27/2025). Q3. The DAEO departed in March 2025 as part of the Deferred Resignation Program (DRP), although he was technically on the books until 12/31/2025.
#5 -- Because of EPA's decentralized ethics program, the delivery of some of the ethics services was affected by the DRP, retirement and agency reorganizations that occurred in CY 2025. The EPA Ethics Office lost one senior ethics attorney that reduced our expertise and staffing levels. Overall, the EPA ethics community lost almost 1/2 of the ethics officials in the agency.
(5) One employee (former DAEO) retired in the first quarter of 2025 but is counted among those who worked on ethics full-time in the DC area in 2025. For most of 2025, we had 4 total employees. One OIG employee handled OIG ethics matters as a portion of her portfolio, estimated 1-10 hours per week.
Question 11: A team from the FDIC's Office of the Chief Information Security Officer performed Security and Privacy Control Assessment testing for the FOnline system for calendar year 2025 in accordance with FDIC and Federal (NIST and FISMA) guidance. FDIC updated and tested its FOnline disaster recovery contingency plan.
The number of full-time employees listed in question 2 above includes five individuals who opted into the Deferred Resignation Program ("DRP"). Their full-time employment with the Federal Labor Relations Authority officially ended on December 31, 2025.
Number 5. In May 2025, GSA's Office of the General Counsel realigned, eliminating its regional structure and creating two new divisions. Changes to these numbers from prior years are largely attributed to this realignment, as well as Deferred Resignation Program departures. As instructed by OGE, the totals in this chart are provided as of December 31, 2025. // Number 10. GSA did not have an agency head for most of 2025. The Administrator was confirmed on December 18, 2025 and sworn in on December 24, 2025.
#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).
Question 2: In addition to 1353 full-time employees, NSF had 178 full-time IPAs on board as of December 31, 2025.

The increase in ethics staff is due to an increase in the number of individual HR specialists who perform ethics-related functions.
Q10. During the Acting Director's initial ethics briefing, the OGE ethics team provided an overview of the agency's ethics program.
#2: Information is classified. #5: Total numbers include all personnel within 2025 despite changes in personnel numbers throughout the year.
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. Q10: For purposes of ethics program administration, the Office Head is the Chief of Staff to the Vice President.
See below regarding notice of ethical obligations in written offers of employment PIAB does not directly employ supervisors.
#5. The number of employees who worked on ethics, which was 9 as of the beginning of 2025, decreased in early to mid 2025 due to personnel losses.
Most former full-time ethics staff departed the Agency by July 1, 2025, and the remaining former full-time ethics staff departed on September 2, 2025. Current staff took over the portfolio in September, 2025. Current ethics staff has extensive experience providing ethics guidance and training, but lacks institutional knowledge and data concerning ethics program administration prior to September 2025. The resulting gaps in historical data, however, have not impacted the effective provision of ethics training and guidance to staff since September 2025.

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?

2 offices did not respond and it is unclear why.

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?

A wave of departures and retirements in 2025 resulted in a large number of Human Resources (HR) officials departing their positions, which we believe caused these notifications to slip. The Office of Ethics will endeavor to strengthen those relationships in 2026 and re-remind the Department's Human Resources Offices of their responsibilities.
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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?

Per FHFA-OIG, "The Bureau of Fiscal Services handles FHFA-OIG hiring actions. An OGE Inspection uncovered this discrepancy in the hiring process and will be corrected moving forward. FHFA-OIG has not hired any employees since the discrepancy was uncovered."
To the extent we have access to or knowledge of the content of all pre-employment communications, written onboarding communications contained some but not all of the required information, and personnel were onboarded at various times. Onboarding processes for presidential appointees to PIAB involved multiple components of the Executive Office of the President. Written onboarding communications will be standardized going forward with approved ethics language.
One offer did not include the contact information for an agency ethics official or include a statement about financial disclosure requirements. This offer, however, was for the incoming DAEO who was aware of how to contact the agency's ethics officials and the requirement for filing financial disclosures.

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?

Due to the presidential transition, OVP did not have finalized formal procedures in place in 2025, but is actively working on finalizing procedures for 2026.

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?

All employment offers are handled through the Department of State HR department. The IJC does not provide written offers for employment.
No offers of employment during this time
Notices of ethical obligations in written offers of employment and for new supervisors are provided by USTR's HR servicing office, the Executive Office of the President - Office of Administration.
the PBRB did not hire any new staff in 2025
Information was transmitting separately.

Table 22: Q.16 Initial Ethics Briefing

The agency leader was appointed during the closure of the government due to the lapse of appropriation and the ethics office was not notified due to furloughs. The individual had received initial ethics training during CY 2025 while serving in a different position within DoD and was provided with an ethics in-brief within 30 days of confirmation.
Secretary's briefing was held late because of agency restructuring immediately after the Secretary entered into her position. Other appointees received briefings late because ethics personnel were furloughed while the new appointees were entering into service.
The Assistant Secretary for Legislation (ASL) originally scheduled his initial ethics briefing within the required 15 days however, on the day scheduled for his briefing, the Senate was voting on the One Big Beautiful Bill Act. Because that bill had many provisions that directly impacted HHS, it was essential for the ASL to be focused on that. The DAEO granted an extension for his initial ethics briefing, and he received his initial ethics briefing the following week.
The deadline was over the end of year holiday period, during which PAS had pre-planned leave.
Government shutdown, employee was relocating and unavailable for in-person briefing, and scheduling conflicts due to the holidays. Extensions were granted by the DAEO/Alt DAEO for all three and all received their briefings as soon as possible, within 30 days of their appointment.
Two officials were provided a brief extension due to being out of the country.
Two appointees were on planned leave so did not receive the additional training within 15 days of confirmation. Pursuant to 5 C.F.R. § 2638.305(b)(1), however, they were granted additional time and did receive the necessary additional training within 30 days of their confirmations.
Due to the demands of initial onboarding, including familiarization with the agency's structure, operations, and responsibilities, the ethics briefing was not conducted within 15 days of the Director's appointment.

Table 23:Q.17 Initial Ethics Training

The two (2) employees were on extended leave and, therefore, could not complete their Initial Ethics Training in the required time frame. Both employees completed their training requirements prior to the end of this reporting period.
DeCA is deploying Skillsoft Percipio this summer (2026), to modernize training delivery and compliance tracking. The platform provides enhanced visibility, automated assignment, and audit-ready reporting capabilities, strengthening DeCA's ability to reliably track and document required training, including new employee ethics.
127 employees were
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. CY25 was particularly challenging because the Agency, overall, lost approximately 10% of its workforce and experienced a hiring freeze. This loss of personnel affected New Employee Orientation (NEO) and the ability to properly track and/or follow up. The Ethics Program and DISA leadership are working to centralize IET tracking to improve the rate of completion.

Employees came into DLA, but immediately went into training or were deployed, so they did not receive the notifications to complete the training. Additionally, we were unable to verify the exact number of people needing IET this year. We changed our virtual training and when we did that, the numbers for IET and AET blended. The above number is our best estimate. However, we can verify that 2 individuals were beyond the 3 month requirement and all have received training, as of today.

DTRA follows a best practice of requiring IET for all its new employees. Efforts to train the two employees reflected in the numbers above were hindered due to their in-processing occurring just prior to the government furlough. Outside of the furlough, both employees completed the training timely. Neither are financial disclosure report filers.

Mandatory training requirements were suspended during the 2025 Transition period across USDA, leading to a lengthy delay in the assignment of Initial Ethics Training (IET). The lengthy 2025 Government shutdown also delayed both the assignment and completion of this training. Despite those delays, approximately 73% of new entrants did receive Initial Ethics Training within their first three months and 89.3% received their Initial Ethics Training in their first year. This was due to the Office of Ethics providing regular reminders and follow up notices. Approximately 16.4% of employees required to complete Initial Ethics Training (IET) did so outside the 3-month window and an additional 10.6% did not complete the training (compared to the approximately 73% of new entrants who did receive Initial Ethics Training within their first three months and 89.3% received the training in their first year). We will continue to follow up with those who did not complete the training and anticipate that the numbers will improve in 2026.

Deferred Resignation Program (DRP), resignations, and retirements created a significant loss in the workforce. Employees who onboarded in Nov/Dec 2025 did not need it by the end of the year. Employees ignored communications about training. Government shutdown. Lack of sufficient technology to track training. Displacement of employees due to fire and asbestos. Employee leave.

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. Both DRP and government shutdown delayed some instruction as well as hampered some tracking operations.

Due to a number of ethics officials and HR employees leaving Federal service, offices were undermanned to maintain proper oversight of ethics training, and ensure that new employees received training timely. The government shutdown also impacted timely completion of IET. Employees have also had difficulty accessing training modules due to system outages. Ethics officials are tracking the employees who still require training, and are working to bring them into compliance with their ethics obligations.

I am checking to see if this person was briefed in my absence

Component agencies/commands reported challenges meeting the deadline due to issues with technology, significant reorganization of personnel, extended government closure due to lapse of appropriations, and term/seasonal/part-time personnel who did not have access to government computer systems.

Agency reorganization after March 11, 2025, caused significant disruption to the training program. We presume employees onboarded before March 11, 2025, received initial ethics training during HR orientations, per the prior ethics team's usual practice. Following agency reorganization, we have

endeavored to ascertain who was onboarded and provide timely training. Some consultant and non-filing appointments evaded the ethics team's notice. Some employees failed to respond to requests to attend scheduled training events. By late 2025, the ethics team had resumed providing training HR orientations to minimize future missed trainings.

Furlough and administrative leave placement impacted employee completion of IETs. Following up with program office regarding these employees. The Department utilizes an online platform to administer initial ethics training for all employees, as defined in 5C.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.

Primary reasons include technological problems accessing the HHS Learning Management System, confusion between IET and AET requirements, employees on extended leave (other than administrative leave), inability to track due to personnel actions affecting members of ethics teams, administrative oversight, lack of timely communication from HR, and employee noncompliance.

Some employees received IET beyond the 3-month requirement or have yet to receive IET primarily due to administrative delays in new hire reporting during the lapse in appropriations.

Scheduling conflicts, government shutdown, administrative error or oversight, employees were on DRP, long term leave, or terminated before receiving training. One employee in CIV is on long term admin leave.

We had some difficulty identifying new employees due to the change in Administration, RIFs, Reorganization, and extended Government Shutdown.

Employees who received and completed IET beyond the 3-month requirement were primarily probationary or temporary and seasonal employees and in many cases a combination of expedited onboarding, inadvertent oversights in communication and tracking, and technological challenges, led to their completion of training 3-months after their respective dates of appointment. 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 also primarily composed of seasonal or temporary employees.

During the Federal government hiring freeze, DOT's orientation process changed, and certain employees onboarded without notifying ethics officials. Upon learning of this oversight, the ethics office worked with HR to establish new procedures and provided ethics orientation to anyone who had not yet received it. Other employees received training beyond the 3-month mark because they were part time or on military leave.

At DO, 3 employees were brought on in January just after the change of Administration and near the subsequent hiring freeze and DRP announcements. Due to those shifted priorities, the training deadline was missed by the Office. At US Mint, 3 employees did not have access to the training and 2 were delayed in taking it. At IRS, there were significant staffing challenges and departures, resulting in 517 employees taking the training outside of the 3-month window, and 33 employees not receiving at all.

Initial ethics training is assigned electronically in VA's Talent Management System (TMS) when an employee onboards with the agency. EST does not track individuals, rather supervisors monitor their employees and the system reports completion. The difference in these numbers are accounted for as follows: there is a 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.

<p>In CY 2025, the EPA along with many other federal agencies “ implemented hiring freezes for career employees. EPA Ethics ensured that political appointees received initial ethics training. For any other employees who joined EPA, the EPA initial ethics training module is part of the online suite of mandatory training courses for all new employees. Deputy Ethics Officials can 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 remind DEOs to keep after their employees who are not completing their training assiduously. For any lapses this year, we believe they occurred due to: (a) a new or probationary employee who was placed on administrative leave or was otherwise not available to take the training (b) human error in the coding of a person as new when actually, the person just moved from one office to another within EPA, or (c) the employee is a new e450 filer but not new to the Agency.</p>
<p>Employees usually complete IET during their onboarding process. On April 29, 2025, the EEOC terminated its contract with the vendor who had provided the government ethics module for IET. The one employee who did not receive IET within 3 months was hired on June 9, 2025. This employee was contacted on July 23, 2025, to confirm that they had completed IET. It was then that the ethics staff became aware that the contract with the vendor had been terminated. It was decided to provide this employee in-person IET, but due to scheduling conflicts, the in-person training occurred outside of the three-month period.</p>
<p>we checked training reports each month and notified employees and supervisors but in a few cases had trouble with compliance</p>
<p>One person left the agency within 30 days of starting and the agency has not been able to confirm if that person attended group ethics orientation.</p>
<p>All employees receive a live 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. Some employees did not complete that online training within the three months.</p>
<p>We communicate with all new employees about the IET deadline multiple times before their 90th day at the NLRB. In most cases, employees comply with the requirement and need very little prompting to finish the online modules within the month that they are onboarded. In 2025, three employees ignored our repeated requests (as well as the autogenerated emails from the learning management system). We reached out to the supervisors for each employee to inform them that the required training had not been completed. Within days, the employees complied with the request to finish the training.</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 the filers and their supervisors to ensure the training is completed where required. 17.a.i - 99.8% 17.a.ii - .1% 17.a.iii- .1%</p>
<p>One employee left the agency before the due date. Outstanding training requirements are being pursued through notifications to the individuals and their supervisors.</p>
<p>16 employees were scheduled to receive IET during the government shutdown. 1 employee departed OA before completing IET.</p>
<p>Training was delayed due to the shutdown.</p>
<p>Due to conflicting schedules, official travel, and the government shutdown, one employee was unable to attend the required IET at the time. The employee has since completed the required training.</p>
<p>Organizational and staffing changes. Government lapse in appropriations.</p>
<p>During the onboarding process, Human Resources registers new employees for IET through SSA's online training system. We request reports from Human Resources regarding compliance. If an employee has not completed IET by the deadline, we reach out to the employee's first-line manager</p>

for assistance. Ultimately, all employees who were required to take IET in calendar year 2025 have done so.
Five of the 6 have been employed less than 90 days as of 12/31/25. The sixth employee was only employed by TVA for 13 days and no training was taken prior to her departure.
One employee was assigned contracting officer representative (COR) duties on or about April 3, 2025. Due to administrative oversight this employee was not identified to the ethics programs as being assigned COR duties and responsibilities until on or about July 8, 2025. This employee completed initial ethics training on July 15, 2025.
We are unsure if three got the training. Of those, two have already left the Agency.
Some new employees were unable to complete IET within the initial 3-month time period due to the government shutdown.

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?

2 offices did not respond and it is unclear why.
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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 2025?

The PAS agency head was terminated by the President on 1/21/2025
The Acting Chairman of the agency, departed on December 22, 2025. The new Chairman was sworn in on December 22, 2025 and received initial ethics training on January 5, 2026, within 15 days of his appointment.
Was not needed due to the position
The federal government shutdown and technical difficulties after reopening hindered launch of the annual ethics training. The training launched 12/15/25, and we accepted completion through 1/15/26. The agency head completed the annual ethics training by January 15, 2026.
Agency Head was Acting and was on part-time detail from DOL. Presumably he received Ethics training from his home agency.
CEO did not complete annual ethics training before Dec. 31, 2025.

Table 27: Q.19 Did the head of the agency complete either initial ethics training and/or annual ethics training in 2025?

The Commission had a career employee acting as the deputy staff director of the agency starting in mid-January 2025
Agency head was not required to complete initial ethics training in 2025 due to December 17, 2025 appointment.

NARA had an acting agency head for much of 2025 who was a PAS with another agency and would have completed training with home agency.
The NLRB's Chairman serves as the head of the agency. In August 2025, the NLRB's Chairman's term expired and, as a result, the Chairman terminated government service. From August 2025 through the end of calendar year 2025, the NLRB did not have a Chairman.
Head of Agency is a detailee.
No agency head. As explained above, the president of USADF left the agency in February 2025. All members of the Board of Directors were removed in 2025 before a new president could be appointed. There was an ongoing district court case (RDI v. Marocco) that challenged the legality of the new leadership of USADF that was finally decided in March 2026. Although there is currently no Board of Directors or president of the agency, the Chief Program Officer (the highest ranking employee at USADF) did receive annual ethics training in 2025.

Table 28: Q.20 Required Annual Ethics Training

For the two other public filers, the government shutdown and implementation activities related to myriad administration directives in CY 2025 interfered with timely training. Training is planned in Q1 of the current CY.
Three employees were on extended leaves of absence.
One Executive Schedule Level I or Level II public filer left the agency before the annual ethics training was conducted.
Explanation of Discrepancies: 19(b). Two public financial disclosure filers (OGE Form 278e) had not completed training by the end of the calendar year. Those employees were in long term administrative leave status and will complete training when they return to duty. 19(c). Three confidential financial disclosure filers (OGE Form 450) had not completed training by the end of the calendar year. Those filers have been and continue to be on parental or other long-term health-related leave and will complete training when they return to duty. 19(d). Eight employees who are not designated as financial disclosure filers had not completed training by the end of the calendar year. Those filers have been and remain on administrative, parental or other long-term health-related leave and will complete training when they return to duty.
Discrepancies are due to individuals being placed on Administrative Leave during 2025 (and still remaining on Administrative Leave) and being unresponsive to messages about completing Annual Ethics Training. One individual is on administrative leave while serving in the military, and one individual is on parental leave.
The two (2) employees were on extended leave (not in a duty status) and, therefore, could not complete their Annual Ethics Training in the required time frame.
The prolonged lapse in appropriations disrupted our training schedule. Although numerous attempts were made to reach all filers and have them complete their annual ethics training, nine confidential filers failed to meet the deadline. Each of the nine filers completed training in January 2026.
7 of the Confidential Financial Disclosure filers were granted exceptions for extended medical leave, military deployments, and reservists on military orders.
Mandatory training requirements were suspended during the 2025 Transition period across USDA, leading to a lengthy delay in the assignment of Annual Ethics Training (AET). The 2025 Government shutdown also delayed both the assignment and completion of this training. Despite that delay, due to regular reminders and follow up notices, approximately 98.3% of employees required to complete

Annual Ethics Training (AET) did so. We will continue to follow up with those who did not complete the training and expect the numbers will improve in 2026.
The discrepancy is due to employees departing under DRP and VERA without taking the training. Additionally, training was not conducted/completed during the furlough period.
DRP, retirements, and resignations created a significant loss in the workforce employees ignored communications about training government shutdown inadequate management lack of sufficient technology to track training deployments and employee leave.
Extended medical and military leaves, overseas deployments, and inaccurate accounting cover some of these discrepancies. Additionally, government shutdown disrupted some communication between HR and ethics officials.
Due to significant turnover of ethics officials, some covered employees were not reminded timely to complete ethics training. The government shutdown impacted the typical training season when ethics officials conduct in-person training, which lessened the opportunities for covered employees to receive training. An online ethics training module was developed to offer training across the agency.
Primarily due to extended leave, deployments, significant reorganization of personnel, and extended government closure due to lapse of appropriations. Ethics officials continue to follow-up with filers to ensure compliance.
Annual training was provided via a FedTalent module. Some employees failed to complete the training despite repeated reminders. We believe these numbers are accurate, but some additional required employees may have completed annual training requirements prior to the March 11, 2025, agency reorganization. No information about such training is available to the current ethics team.
278 filers: One filer on extended leave. 450 filers: Five filers are on extended military duty three on parental leave one on suspension. Other delay was due to furlough and course platform technical issues GC-21 is tracking their completion.
Primary reason is employees on extended medical, family, military, or administrative leave. Other reasons include technological problems accessing the HHS Learning Management System, confusion between IET and AET requirements, inability to track due to personnel actions, and employee noncompliance.
Employees were on extended medical, administrative or military leave. Others have been referred to management for consideration of appropriate action to remedy non-compliance.
Preparation for AET started later than usual due to the departure of all 6 HQ ethics staff attorneys, who opted into the DRP, and the unprecedented amount of requests for outside and post-government employment advice from DRP participants and reinstated probationary employees. The live AET event scheduled for October 15, 2025, was cancelled due to the shutdown. After the shutdown ended, it was determined that the AET should be filmed and disseminated to HUD employees to take as a virtual training. The AET did not go live until December 2025. Many employees did not complete the training by the end of the year due to technical difficulties accessing the training, or being absent due to medical, use/lose, or administrative leave under the DRP. The training remained open until the end of January 2026.
Extended leave including military, family, parental, admin and sick, government shutdown, impending separation before completion of training, DRP enrollment, detailed away from DOJ without access to LMS, agency reorganization and staff turnover. Agency reorganization and ethics officials departure/turnover as well as training officials' departures/turnover contributed to administrative record keeping difficulties.
Employees on extended or military leave. There were issues with employees not responding to reminders or scheduling conflicts.

Ethics training was not available to Department employees during the extended Government Shutdown. Due to the Department Reorganization, RIFs, DRPs, shutdown, etc., fewer reminder emails to Department employees were sent compared to past years.

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 employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status. Any employee not in one of the listed categories and who also did not complete AET by December 31, 2025, completed AET by January 30, 2026.

Many DOT ethics officials and other employees were furloughed during the Federal government shutdown, which delayed the completion of annual ethics training. Other employees who did not complete annual ethics training were on long-term medical leave, parental leave, or military leave through the end of 2025.

Government shutdown significantly reduced the ability to get everyone trained, especially as some employees had use-or-lose annual leave at the end of the year. At DO, 2 employees were excused for extended medical leave at the end of the year and 1 employee was excused for emergency family leave, but completed upon return in January 2026. At US Mint, 2 employees were on extended leave. At OCC, 15 employees were on either administrative, medical, parental, or military leave without access to the OCC systems. At TTB, 2 employees were on extended medical leave. At FinCEN, 8 employees were either on extended leave or did not complete the training during CY2025 despite several reminders to do so. At IRS, several filers were assigned the training but were unable to complete it prior to 12/31/2025 due to the shutdown and increased workload from staffing shortages.

VA ethics staff continue to work with remaining public filers to ensure the completion of annual ethics training for 2025. The remaining individuals are on extended leave. All other VA employees are required to take annual ethics training in VA's Talent Management System (TMS) system and 95% completed the training. The supervisors monitor the individual employee's compliance with this agency wide requirement. Variances relate to maternity, paternity, extended sick leave and military service.

CY 2025 brought unprecedented changes to the federal workforce, including at EPA. Any discrepancy between filers who did not complete annual ethics training is due to: (a) public filers who accepted deferred resignation, effective 12/31/25, but who were not required to take annual training (b) employees still on administrative leave as established by EPA management or (c) other leave situations, such as military leave, extended medical leave, or parental leave.

Four employees in covered positions who file 450s were on extended sick leave when 2025 annual training was presented and thereafter. One employee, who currently is involved in trial work, will complete the annual training the week of February 12, 2026.

The government shutdown toward the end of 2025 created notable scheduling difficulties with providing annual training to all employees. In the narrow timeframe for training at the end of the year, we attempted to maximize the number of employees who completed training by providing a self-guided online training with quiz questions and extending the completion deadline to January 31. Nevertheless, we could not capture the 99% completion rate we customarily do. As a result, we are resolved to actively encourage and provide multiple training sessions throughout 2026 for all employees.

FCC Ethics was unable to release our updated training module to employees until December 5 due to the lapse in appropriations.

The federal government shutdown and technical difficulties after reopening hindered launch of the annual ethics training. The training launched 12/15/25, and we accepted completion through 1/15/26.
In 2025, numerous employees retired, or were on extended leave, including sick leave, military leave, maternity /paternity leave or deceased.
One employee is out on maternity leave the other is on extended leave.
The DAEO granted one Special Government Employee (SGE) an extension of time to complete the annual training for reasons that cannot be disclosed pursuant to the Privacy Act.
Two confidential filers were unable to complete the annual training due to medical or other reasons.
Two OGE Form 278e filers were on parental leave during annual ethics training season through the end of CY 2025. One completed the training in January 2026 after returning to the agency. The other will receive training after returning to the agency. Two OGE Form 450 filers were on administrative leave during annual ethics training season through the end of CY 2025. They will receive training should they return to the agency. Two other OGE Form 450 filers were on parental leave during annual ethics training season through the end of CY 2025. They will receive training after returning to the agency. One OGE Form 450 filer missed the deadline but completed the training in January 2026. Another OGE Form 450 filer did not complete the training due to an administrative error. This individual completed the training in February 2026. See comments.
Number 20(b). 1 employee on extended administrative leave // Number 20(c). Due to the Deferred Resignation Program, other separations, and the lapse in appropriations occurring in 2025, these numbers may have a slight margin of error.
Employees were notified about the training requirement numerous times however they did not complete the training.
These numbers are a best estimate according to our report in FedTalent. Our numbers are significantly lower than previous years due to Agency uncertainty and the employee in charge of training took the DRP which resulted in a lack of communication regarding the Annual Training.
We are following up on the small number of employees who were required to receive training but did not.
Given the 2025 government shutdown, NARA had a shortened annual training period for OGE 450 filers. As a result, 6 OGE 450 filers completed the 2025 annual ethics training early in January 2026.
One 278 and one 450 filer did not finish AET prior to going on annual leave. Both were asked to complete the training upon their return to the office. Both completed the training as requested. One supervisor (d. above) has not started AET because they have been on extended medical leave. Due to the extended lapse in appropriations, the Ethics Office had an unusually limited period of time to manage the completion of this annual requirement.
Six 450 filers did not receive training. One filer was out of the country at the end of 2025, with no access to NSF systems. Another was on extended leave through the end of 2025. The remaining four inadvertently were not assigned training. Of them, two were listed as having terminated, but returned to NSF. The other two were not assigned because of administrative error.
20a. n/a 20b. Required - this is protected information. 20c. Required - this is protected information. 20d. n/a TOTAL Required - this is protected information. # Received of those required is 99.7%. 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.
All new NSC employees were provided ethics training in 2025 by NSC or WHO counsel. However, nine employees who started in the previous administration were not provided initial ethics training, nor

<p>did they receive annual ethics training in 2025. All nine employees have since been provided ethics training in January 2026.</p>
<p>The NTSB requires all agency employees to complete live annual ethics training. Due to the 2025 government shutdown, the annual ethics training schedule was delayed. Two live training sessions were conducted in December 2025, resulting in 376 employees completing the training by December 31, 2025. One make-up session was held in January 2026, during which an additional 19 employees completed the training. Thirteen employees were unable to attend a live training session and were assigned the interactive ethics training, with a submission deadline of February 6, 2026. As of February 2, 2026, six of those employees have completed the interactive training, with seven remaining. One employee was unable to complete the training prior to retiring in January 2026. As of February 2, 2026, 401 employees have completed the required training.</p>
<p>Several employees were on extended leave through the end of the year. Timely completion of annual training requirements in CY 2025 was also affected by the prolonged government shutdown, because the shutdown delayed the NRCs assignment of training until mid-November. Outstanding training requirements are being pursued through notifications to the individuals and their supervisors.</p>
<p>5 employees have not yet completed IET. 8 employees have had technical issues with the training are still trying to complete IET.</p>
<p>Of the two public filers who did not receive AET in 2025, one retired and one took DRP. Of the two confidential filers who did not receive AET in 2025, both were on unexpected medical leave from the time the annual training was first offered through 12/31/25.</p>
<p>ONDCP annual ethics training was originally scheduled to be conducted in October 2025. However, due to the government shutdown, the training was postponed and subsequently rescheduled for January 2026. IET and Annual ethics training cover the same topics. Employees who began service in 2025 completed IET as part of their onboarding and, therefore ONDCP did not require them to attend annual ethics training. Additionally, a small number of employees elected the Deferred Resignation Program (DRP) and were no longer reporting to the office however, their official last day of service was December 31, 2025. As of today, with the exception of one employee on Leave Without Pay Status, all ONDCP employees have completed their required ethics training.</p>
<p>During this reporting period, two employees were (and remain) out of the office on extended medical leave or FMLA.</p>
<p>Due to understaffing in the ethics office, training reminders were not sent out in the days leading up to Dec. 31, 2025, leading to under-completion of the ethics training requirement.</p>
<p>Six public filers, one confidential filer, and three other employees were on leave when annual training was held. All ten employees completed their 2025 annual ethics training session in January 2026.</p>
<p>One Board Member is a part-time SGE who has served as the Head of Agency since late January 2025. She completed annual ethics training specific to her new duties in March 2025 with the DAEO based on her change of role, Hatch Act training in October 2025, and annual ethics training in January 2026.</p>
<p>Two OGE 450 Filers were on extended leave during CY2025 and have not yet returned. Upon their return, OEC will ensure they complete the training.</p>
<p>--Extended government shutdown for 43 days delayed ethics training --DRP delayed normal training as many former assistant ethics counselors retired or left SBA</p>
<p>278e Filers: o Two filers were late in taking the training“ one took on 1/1/26 and the other took on 1/8/26. 450 Filers: o 1 employee is still past due but he is locked out of the TVA network and unable to gain access until the ethics training is complete.</p>
<p>The government shutdown significantly impacted the timeline for providing annual ethics training. The month of October is the usual time for our annual ethics training sessions and due to the shutdown, annual training was deferred until the last weeks of November and the month of</p>

December. The 4 final personnel pending training as of 12/31/2025 were provided a self-paced training option to complete at their earliest convenience during January 2026. Three of the four have completed this in January 2026, while the remaining 1 is on maternity leave through March 2026
Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for Agency ethics between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September 2025 and staff access to legacy data (likely incomplete) is unavailable. Training for 2025 was conducted using a self-study and certification process.
There are issues with providing HUD's virtual AET training, which was not available until December 2025 due to staffing issues and the shutdown, outside of HUD systems, and this was not resolved prior to the end of 2025.
There was a total of 27 employees who did not take annual ethics training before the training deadline, despite multiple notifications.
The majority of USAGM employees are on administrative leave and do not have access to their work email.
Several filers had scheduling complications (i.e. long-term leave, parental leave, etc.) and will complete the required annual training upon availability.
AET sessions were disrupted due to the government shutdown. All employees were provided ethics training in January 2026.
The commission will work with OGE to ensure the employee receives training in 2026.
Almost all employees, including the DAEO and ADAEO, were placed on administrative leave in March 2025 then RIFed in April. Following a district court injunction, employees were brought back at the end of July but were not able to access systems and records until August. On December 12, before three employees could complete their annual training, every employee lost access to Outlook, Teams, SharePoint, financial systems, and the physical office space. This remained in effect until a district court made a final ruling in RDI v. Marocco on March 13, 2026.

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?:

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.
See Joint Ethics Regulations, May 15, 2024, Chapter 9, Section 4, which requires additional training for ethics officials.
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 as well as DRP specific guidance. Also, inspectors general, financial, and acquisition professional preformed annual ethics training.
Ethics officials certified at the DON are required to complete six hours of instruction to complete an initial certification. After that, ethics officials must complete one hour of ethics instruction to maintain an annual ethics official certification. Certifications are handled by the cognizant Deputy Designated Agency Ethics Official.

<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. Most components require all employees to complete annual ethics training. At the time the data was compiled, 32,390 non-covered employees completed AET. Some components require new employees to attend an ethics orientation, in addition to completing HHS's IET. 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>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 2025 regardless of their financial disclosure status. Many components require annual ethics training for all employees and interns regardless of their financial disclosure status. Component ethics officials provide ethics training to departing employees focused on post-government employment restrictions. In 2025, specific ethics training on outside employment rules was provided to DRP participants.</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>In CY 2025, the DEO provided additional mandatory training for employees performing ethics duties, including training on reviewing gifts of non-federal travel expenses under 31 USC 1353, ethics training on common issues related to the DR/RP, and post-government employment. The DEO also hosted a three-day virtual Ethics Summit for employees performing ethics duties. 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. Additionally, approximately 60% of the ethics officials in the DEO completed and earned a Professional Ethics Practitioner certificate from OGE in CY 2025. 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. The DEO also offers training to public and confidential filers prior to the due dates of their respective reports. Further, under the authority established by 5 CFR 2638.307(a)(4), 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 certain groups of employees on a number of targeted ethics topics</p>

including, but not limited to, the following: post-government employment restrictions, 14 General Principles, and ethics and the travel review process.
The agency's Ethics Office established a continuing education requirement for the deputy ethics official and a training for senior leaders on the rules regarding third-party payment for travel.
FHFA requires all employees to complete annual ethics training (individuals who received new employee ethics orientation in 2025 were exempt from this requirement)
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. The agency also updated any outdated and created new SOPs.
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 contractor (PSC) staff at overseas Peace Corps posts were required in 2025, as they have been for several years now, to review ethics materials upon entering on duty.
Required annual ethics training for all SBA employees, not just 278 and 450 required filers. Utilizing technology via the SBA HR Talent Management Center (TMC) ethics training module to give interactive ethics training slides to all employees. Training is trackable and completion of a quiz completes the training. Over 3,600 SBA employees (permanent and term) received and completed the interactive ethics training per 2025 TMC transcript.
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. Two employees are in the process of becoming Deputy Ethics Officials and underwent additional training on top of all other training during CY2025.
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?:

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.
OGC attorneys
Ethics officials sent annual ethics training to all agency employees and requested, but did not require, completion.
CEQ provides live interactive initial, annual, and Hatch Act training to all employees, including detailees.
DeCA General Counsel provided additional, supplemental ethics training to the Agency Director's administrative staff, contracting specialists, and procurement ethics training for agency personnel participating in large scale procurement actions.
All DFAS employees are required to complete annual ethics training online.
All employees, not just Confidential Financial Disclosure filers, complete "Annual Ethics Training" and "Working with Contractors: Common Legal & Ethical Issues." The Ethics Program also holds additional live trainings and question/answer sessions through DISA's quarterly Symposium for Employee Engagement & Development (SEED). In CY25, SEED Training was provided on the following topics: "Hot Topics in Ethics," "Post Government Employment," & "450s & Conflicts of Interest." Finally, the Ethics Program published ethics articles on the internal agency website to further educate the workforce and keep ethics topics front of mind.
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 as well as DRP specific guidance. 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. The 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.
New Deputy Ethics Counselors (DECs) and Ethics Coordinators (ECs) are required to complete an orientation training with Ethics Division attorneys. Most components require all

<p>employees to complete annual ethics training. At the time the data was compiled, 32,390 non-covered employees completed AET. Some components require new employees to attend an ethics orientation, in addition to completing HHS's IET. 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>All employees were required to complete annual ethics training.</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 2025 regardless of their financial disclosure status. Many components require annual ethics training for all employees and interns regardless of their financial disclosure status. Component ethics officials provide ethics training to departing employees focused on post-government employment restrictions. In 2025, specific ethics training on outside employment rules was provided to DRP participants.</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>In CY 2025, the DEO provided additional mandatory training for employees performing ethics duties, including training on reviewing gifts of non-federal travel expenses under 31 USC 1353, ethics training on common issues related to the DR/RP, and post-government employment. The DEO also hosted a three-day virtual Ethics Summit for employees performing ethics duties. 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. Additionally, approximately 60% of the ethics officials in the DEO completed and earned a Professional Ethics Practitioner certificate from OGE in CY 2025. 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. The DEO also offers training to public and confidential filers prior to the due dates of their respective reports. Further, under the authority established by 5 CFR 2638.307(a)(4), 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 certain groups of employees on a number of targeted ethics topics including, but not limited to, the following: post-government employment restrictions, 14 General Principles, and ethics and the travel review process.</p>
<p>At the DO level, all newly appointed political appointees below the PAS level are required to attend a live Senior Level Ethics & General Law briefing in a group setting in addition to the New Employee Orientation. At US Mint, all employees are offered Annual Ethics Training (AET). At IRS, OCC, and TTB, all employees are required to take AET.</p>
<p>All employees are assigned Annual Ethics Training each year</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 developed and implemented supplemental ethics training in 2025 for identified procurement and acquisitions staff.</p>
<p>The agency's Ethics Office established a continuing education requirement for the deputy ethics official and a training for senior leaders on the rules regarding third-party payment for travel.</p>
<p>All Commission employees not just financial disclosure filers are required to take the Annual Ethics training.</p>
<p>All GSA employees were required to complete annual ethics training. We also sent an annual reminder to managers and supervisors about their ethics responsibilities.</p>
<p>Employees who are not required to file 450s or 278s receive annual ethics training along with required filers at the agency. In addition, all employees are put on the same training cycle as 278 filers. This year all 278 filers were required to receive live training and therefore all employees received live training as well.</p>
<p>All employees who serve as evaluators for procurements are required to complete a training. In addition, 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 Management Team - approximately 20 senior officials - receives ethics briefings.</p>
<p>Annual ethics training was mandatory for all NCUA employees in CY2025, regardless of financial disclosure filer status.</p>
<p>Internal training for OGE 450/278 reviewers.</p>
<p>It is our practice to send reminders that cover topics that are included in our required Annual Ethics Training to all Agency employees throughout the year. This approach ensures continuity in our messaging concerning the Standards of Conduct and Criminal Conflict of Interest Statutes. We also give a customized ethics briefing to Senior Executive Service employees who were not promoted from within the NLRB, all participants of the Agency’s Summer Intern Program, and all attorneys hired under the Honors Attorney program. We provide a comprehensive ethics training to members of a Presidential appointee’s front office staff (career and non-career staff) to ensure that these employees understand the additional limitations that are placed on appointees.</p>
<p>All incoming employees receive an initial ethics orientation during their onboarding. All ethics training is done in person.</p>
<p>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.</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. The agency also updated any outdated and created new SOPs.</p>
<p>DAEO requires that all Commission employees – even non-filers – receive annual ethics training (performed live via Microsoft Teams in 2025).</p>
<p>All PCLOB employees undertake annual ethics training, regardless of duties.</p>

The SEC required mandatory ethics training in 2025 for all SEC employees onboard as of December 31, 2024. Employees onboarded on January 1, 2025 or after received mandatory initial ethics training.
We worked with SSA’s Human Resources to ensure that all new employees receive training on how to identify, report, and prevent human trafficking within 90 days of onboarding new hires must certify that they have completed training. In addition, all Operations managers (4,250) received live, mandatory Continuing Ethics Training during 2025. Also during 2025, 42,581 SSA employees received Experienced Employees Ethics Training, a Video on Demand refresher ethics training for employees who do not receive Annual Ethics Training, designed to ensure all agency employees receive ethics training every 6 years.
In addition to public financial disclosure filers and confidential financial disclosure filers, my agency requires all remaining employees to complete annual ethics training.
All incoming employees receive an initial ethics orientation during their onboarding. All ethics training is done in person.

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?:

All Bureau employees must take annual ethics training without regard to their status as an OGE Form 278e or 450 filer.
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 as well as DRP specific guidance. Also, inspectors general, financial, and acquisition professional preformed annual ethics training.
Agency Policy Letter requires all EXIM employees to attend initial and 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 also assists employees to ensure that they are conflict-free before engaging in Farmer Mac oversight activities. The training is online and accompanied by a policy and a form that employees sign and certify that they understand the ethics rules. This training is repeated annually and provided to employees newly assigned to Farmer Mac oversight throughout the year.
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.
NEH provides annual ethics training to all agency employees, including those not otherwise required by regulation to receive 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. The agency also updated any outdated and created new SOPs.

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):

CIGIE conducted all hands training on post-employment restrictions due to PRAC's statutory sunset.
We provided tailored ethics trainings to multiple DIA offices and groups, such as, the Defense Attach Service, Middle East/Africa Regional Center, and the Office of Counterintelligence, and Contracting Office Representatives throughout the year. Additionally, the DAEO and ADAEO routinely provide ethics advice about upcoming priorities and mission requirements as part of routine senior level staff meetings.
New point of contacts were provided a copy of training slides of slides and a how-to handout after appointment.
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 the agency head where any ethics issues are addressed. DAEO holds bi-weekly ethics team meetings to address issues. Due to the deferred resignation program, additional training through briefings and handouts was provided to participating individuals concerning their ethics responsibilities during and after the deferment.
Programs worked with Ethics Division to understand and manage the risks that arose while many employees were on administrative leave and developed standard guidance messages for those employees. Some programs met with individual employees to discuss risks in specific situations. One component does a quarterly risk assessment. The Ethics Division sent risk management communications to our ethics officials, including about employees on administrative leave, gambling in the workplace, and a lapse in appropriations.
We took inspiration from the Annual Conflict-of-Interest Prosecution Survey.
DEO coordinates risk assessment with leadership to help inform ethics communications. DEA ethics officials coordinate high risk issues with DEA Office of Compliance.
EST works directly with VHAs Ethics Advisor Program composed of Integrity & Compliance Officers throughout the agency. This program involves over five hours of initial ethics training and multiple follow-up sessions on particular topics yearly with required recertification training every two years. 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. There is continual ethics training both in-person and virtual, plus coordinated trainings throughout VA.
Conducted self-assessments to ensure that required employees are receiving training, Reviewed advice logs for increased activity after training presentations and communications, Held discussions with agency leaders and employees to evaluate whether the training and communications they received have supported them in managing ethics risks., Incorporated inclusivity principles in the development and delivery of ethics education, Ensured ethics education was accessible (508 compliant) to participants
The agency identified that facts could change as to outside activities that were long in duration and established a process by which we ask for a periodic check-in to make sure that facts underlying the approval have not changed.

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.
Reviewed advice logs for common issues, Discussed upcoming work and agency priorities with senior staff, Talked to program managers about risks inherent in their work, Talked to employees about the ethics concerns they encounter in the workplace.
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.
USAID did not assess risk, however, given the significant change in the size and composition of the workforce it was decided that in lieu of the previously employed in-person training, self-study and certification would be used for 2025. To provide coverage to the entire workforce, even those not required, the self-study slides were sent to all 281 staff then on the rolls in November 2025. Those not required to take the training, e.g., ISC staff, were encouraged to review the slides and take the self-study Q&A, but not required to certify. To date the Ethics office has nevertheless received approximately 120 certifications, including those required. Above we only report on the staff covered by the ethics program.

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):

Received written feedback from DCAA Managers and Supervisors about the effectiveness of all Ethics Training.
At IRS, the ethics officials conducted knowledge check surveys.
Although we do not currently have a formalized evaluation process, we do gather responses anecdotally from our learners and our clients. The 2025 annual ethics training on Loss of Impartiality was extremely well received and addressed a top area of concern expressed by DEOs. As we navigated our way through a tumultuous year, we hosted multiple training sessions for employees considered deferred resignation as well as post-employment briefings for those who did accept the DRP. We also posted information and FAQs for employees that we shared with other federal ethics officials. We received many compliments on the thoroughness of our responses, as well as for the expertise 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.
Conducted self-assessments to ensure that required employees are receiving training, Reviewed advice logs for increased activity after training presentations and communications

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

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.
The very high rate of compliance in completing annual ethics training required significant teamwork and resources to achieve given the lengthy Government shutdown in the fourth quarter of the

calendar year. The shutdown resulted in employees not having access to the agency's online training system for 45 days.
Qs 16 & 19: The Bureau's Acting Director is OMB Director Russell Vought. Acting Director Vought received in-person Initial Ethics Training from OMB ethics staff on January 30, 2025 and the requisite supplemental ethics briefing for PAS officials after his confirmation on February 19, 2025.
17. The low numbers for new employee training are the result of the extended Federal hiring freeze. Additionally, DeCA undertook a "Bottom Up Review" of the number of personnel and did not replace the employee positions who accepted the Deferred Resignation Program. 20(c) Employees departed agency before annual ethics training held.
Qs 22 & 23: The Ethics Program held trainings and provided additional guidance on targeted ethics issues of interest to the workforce. In CY25, DRP and VERA/VSIP generated an increased interest in and questions about seeking employment, outside employment, and post-Government employment. The DRP presented a unique scenario for addressing dual employment opportunities with Government contractors. In accordance with OGE's "Deferred Resignation Program and Other Extended Leave Statuses" Frequently Asked Questions" and SOCO's "ETHICS GUIDANCE FOR DO[W] EMPLOYEES PARTICIPATING IN THE OFFICE OF PERSONNEL MANAGEMENT DEFERRED RESIGNATION PROGRAM," the Chief Ethics Officer developed guidance for the DISA workforce to assist in understanding the laws, rules, and regulations that apply during the Deferred Resignation Period vs. after separation from Federal service. In CY25 the Ethics Program revised its Annual Ethics Training (AET) for Seniors for CY26. Of note, leader-led live training will be conducted in small groups of a few Seniors and their staff to provide the most relevant and useful information to the required Seniors along with their staff, who are first and/or more frequently aware of potential hurdles/pitfalls.
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 a special Senior Leader Session. Individuals from various components requested ethics advice on matters affecting their components which was disseminated out to all.
The new ethics team collaborated with the HHS Ethics Training Division to get new employees IET on an emergency basis in the first half of 2025. The HHS staff then trained ED staff on how to provide the required training going forward. ED staff ultimately took over live trainings, evaluated by HHS for the sufficiency of the presentation, before conducting trainings on their own through the latter half of 2025. For question 20, the current ethics team is unaware of any employees who required annual training but are not financial disclosure filers. The previous ethics team indicated the Department had 18 such employees in 2024. On question 22, the ethics staff evaluated our risk during agency realignment to ensure concurrent and post-government employment advice was provided timely to retired and RIF'd employees. The ethics team discussed our upcoming priorities, including OGE program review, with the Acting General Counsel and commenced a hiring process to add ethics staff capacity.
Q17 DEO gave monthly live initial ethics training sessions via Teams in CY2025, attendance at which was tracked by LMS contractors. In mid-year the LMS contract was canceled, and, unbeknownst to DEO ethics training attendance was no longer tracked. To the best of DEO's knowledge, all new employees required to take initial ethics training in the latter half of 2025 were notified to take IET and participated in a live session. Starting in January 2026, tracking and record keeping for IET will now be done in house by DEO. DOJ/DEO developed an inhouse ethics training module via its Learning Management System. In 2025, 3,624 employees completed the online ethics training module.
DOL only had a DAEO for 3 weeks in January and then the role was vacant for the remainder of 2025.
Additional comments for Question #18: In CY 2025, 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 the

<p>National Indian Gaming Commission (NIGC). OIG and NIGC ethics officials are not under the DAEO's direct supervision and both OIG and NIGC each have less than 1,000 employees. NIGC elected for new employees to receive the IET provided by the DEO. OIG elected to provide their own IET and provided the DAEO with information on the procedures which have been implemented for the provision of IET for OIG employees. Additional Comments for Question #20: In addition to the targeted ethics training highlighted in Question #21, the DEO provided AET training to approximately an additional 2000 DOI employees who were not otherwise required to complete AET in CY 2025.</p>
<p>Question 20: The federal government shutdown and technical difficulties after reopening hindered launch of the annual ethics training. The training launched 12/15/25, and we accepted completion through 1/15/26.</p>
<p>One OGE Form 450 filer missed the deadline and still needs to take the training. The last person (who is not a filer) was on active duty for the military during annual ethics training season through the end of CY 2025. This person will receive training after returning to the agency.</p>
<p>Number 20(c). This number reflects GSA's overall decrease in agency staff reported in Part 2 due largely to the Deferred Resignation Program and other separations in 2025.</p>
<p>While IMLS had 57 confidential filers for 2025, all but 18 of them departed before annual training took place.</p>
<p>NASA Administrator Jared Isaacman was appointed on December 17, 2025 and received his initial ethics briefing per 5 CFR 2638.305(b) on December 19, 2025, though not required to receive the briefing until January 1, 2026.</p>
<p>Question 20: Required and received numbers do not include employees who departed the agency in 2025 as part of NCUA's Voluntary Separation Program.</p>
<p>#16(a): No new agency leaders, as defined in 5 C.F.R. 2638.305(a), joined NEH in 2025. NEH has one PAS, non-SGE "agency leader" - the Chairman- who receives annual in-person ethics training.</p>
<p>#16, #17, #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.</p>
<p>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, 24 unpaid volunteer interns completed IET in 2025. 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). The Ethics Office also provided ethics briefing to management level detailees to NLRB headquarters. Finally, the NLRB has developed and circulated ethics guidance and resource materials on a range of topics throughout the year, including conflicts of interest, Hatch Act, impartiality, outside work and activities, gifts, and issues related to legal ethics/professional responsibility.</p>
<p>#19. The current agency leader is a career employee serving in an acting capacity. This individual received annual ethics training.</p>
<p>#22, OA requires every OA employee to take ethics training.</p>
<p>Q16 -In 2025, OGE had three Acting Directors. Each served in an acting role while also holding a separate full-time government position. All three received the mandatory initial ethics briefings from their respective parent agencies. One of the Acting Directors requested that OGE provide an additional initial ethics briefing.</p>
<p>Question 23: Received very positive feedback from OSC employees and interns on USDA DAEO's annual ethics training. We also updated online initial ethics orientation</p>
<p>Ethics officials publish routine quarterly 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</p>

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, OGE updates, etc.) are periodically circulated to all employees to draw attention to the importance of following (and consequences of ignoring) ethics rules.

Applicable to foregoing questions: Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for the Agency ethics program between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September 2025 and current staff lack full access to legacy data therefore the foregoing numbers are based upon available information.

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 2025. Rank them in order, so that the first topic is the topic on which employees sought guidance the most frequently.

A large volume of USDA OE's workload in 2025 was responding to requests for guidance from employees participating (or weighing whether to participate) in the Deferred Resignation Program (DRP). Such questions encompassed a mix of seeking employment, post-employment, representation and conflicts issues.
Fundraising by employee groups
Office-wide advice about continued ethics obligations during a lapse in appropriations. Technically, no one sought advice on this subject--it was provided proactively.
Deferred resignation program
Reporting Relationships-Nepotism
Review of official speaking invitations.
Seeking and negotiating for outside employment
Seeking employment
Supplemental Agency Regulations
USICH was effectively shut down and the two remaining employees are performing no work. No advice was requested beyond the review and certification of financial disclosure reports.

Table 36: Q.26 Number of 18 U.S.C. § 208 waivers granted in 2025:

Waivers at NIH are submitted to OGE on a quarterly basis. Consistent with reporting in previous years, NIH data for the Number Sent to OGE reflects waivers sent in Q4 of FY24 and Q1-Q3 of FY25.

Table 37: Q. 27 Number of Legal Expense Fund documents filed in 2025 (pursuant to 5 C.F.R. § 2635.1007):

NONE

Table 38: ADDITIONAL COMMENTS FOR PART 6. Indicate the question number to which the comment corresponds.

We did approve receipt of pro bono legal services by one employee in CY 2025.
Q26. While five waivers were granted by the White House Counsel, only two pertained to a WHO employee. All of the waivers are available at www.whitehouse.gov/disclosures/ .

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))?

There were no appointments to public financial disclosure filing positions.
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 Dept of Interior. She is aware of all appointments.
We have only 4 public filer positions (one currently vacant) and it is evident to the DAEO when they are appointed (or terminated).Therefore notification by HR is not necessary.
No public filers were appointed during the reporting period
In 2025, USARC had no new appointments of public filers.
Due to the structure and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
There were no changes or additions to personnel.
Most of the positions for which the agency was hiring did not require the filing of a financial report. Further, the agency hires fewer than 5 employees annually on average, so the ethics department is already aware of every hire and makes an assessment as to whether public/confidential disclosures are required for every new hire.
The Commission did not have any new appointments to public financial disclosure filing positions.
The Office of the General Counsel, not Human Resources, make the determination of public and confidential filing positions.
We did not hire anyone in FY 25
FCSIC did not gain any Public Financial Disclosure Report filers in calendar year 2025.
No appointments to public or confidential filing positions in 2025
Our only filer is the DAEO
No public filers were brought on board in 2025. Detailees from DoL were presumed to have filed in their home agency.
There were no Public Filers hired in 2025.
We did not experience any hires or transfers that required such notifications in 2025.
No new hires in 2025.
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.
DAEO is aware of all hires/promotions that would impact financial disclosure reporting requirements/changes.
No new hires were made in 2025.
no new appointments in 2025
There were no appointments during this time period
No appointments made during CY25
no new staff were hired in 2025
No new filers

The Commission is a federal-state partnership with the federal side having one employee, the DAEO. The Commission itself, is non-federal.
There were no appointments to public financial disclosure positions in our agency during 2025.
Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for the Agency ethics program between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September 2025 and current staff lack full access to legacy data therefore the foregoing numbers are based upon available information.
There were no appointments to filing positions in 2025.
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.
Our agency is very small, and the DAEO is generally aware of all new employees hired by the agency. Once new employees are onboarded, the DAEO informs new employees of filing requirements if applicable.
There were no appointments to confidential financial disclosure filing positions.
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 Dept of Interior. She is aware of all appointments.
We have only 8 confidential filers and it is evident to the DAEO when they are appointed. Therefore notification by HR is not necessary
No confidential filers were hired during this time period.
In 2025, USARC did not have any appointments of new 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.
There were no changes or additions to personnel.
Most of the positions for which the agency was hiring did not require the filing of a financial report. Further, the agency hires fewer than 5 employees annually on average, so the DAEO and ADAEO are already aware of every hire and makes an assessment as to whether public/confidential disclosures are required for every new hire.
The Commission did not have any appointments to confidential financial disclosure filing positions.
The Office of the General Counsel, not Human Resources, make the determination of public and confidential filing positions.
Only have to file public disclosure.
We did not hire anyone in FY 25
FCSIC did not gain any Confidential Financial Disclosure Report filers in calendar year 2025.
No appointments to public or confidential filing positions in 2025
We have no confidential filers
We did not experience any hires or transfers that required such notifications in 2025.
No confidential hires in 2025.
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.
DAEO is aware of all hires/promotions that would impact financial disclosure reporting requirements/changes.
No new hires were made in 2025.
no hires in 2025
No one appointed to a confidential financial disclosure filing position in 2025.
No appointments made during CY25

No new confidential filers hired in 2025.
no new staff were hired in 2025
Not Applicable, No positions meeting the C.F.R. § 2638.105(a)(1)) requirement were hired.
Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for the Agency ethics program between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September 2025 and current staff lack full access to legacy data therefore the foregoing numbers are based upon available information.
There were no appointments to filing positions in 2025.
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.
Our agency is very small, and the DAEO is generally aware of all new employees hired by the agency. Once new employees are onboarded, the DAEO informs new employees of filing requirements if applicable.
There were no new public filers in 2025. There were no new confidential filers in 2025.

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))?

Following engagement with the Dept. of Government Efficiency (DOGE), large numbers of agency staff were placed on administrative leave pending RIFs and many participated in the Deferred Resignation Program (DRP). As a result, many acting agency leaders have undertaken several roles/obligations. The Agency and OHC have capture many of the initial acting appointments to public disclosure roles occurring during the first months of the new presidential administration and as a result of staffing shifts from the DRP. As OHC remains generally overwhelmed during this transition, there has been delay of some of these later notifications of appointments to acting positions that have a public financial disclosure obligation. The Office of Human Capital is generally processing these appointments retroactively, and OGC is working to properly capture these appointments closer to their active start date.
The answers to this question ran the gamut of "in all cases" to "not applicable". For "never", it was because positions are often times not coded properly, as well as HR offices simply not notifying the appropriate office.
In light of the deferred resignations and OPM data calls, new hire/promotion reports became less of a priority. Additionally, there were very few new hires and promotions in 2025 pursuant to the Administrations directives.
The NRC has taken positive steps in this area since CY 2024, but timely notification of appointments and terminations in covered filing positions continues to be a challenge for our program. The situation was exacerbated in CY 2025 by a high volume of personnel actions across the agency, including temporary or acting appointments to vacancies, as well as atypical challenges such as the extended lapse in appropriations and staffing changes under the Deferred Resignation Program. In CY 2025, our ethics teams worked with contractors to complete integration of the NRCs Ethics Gateway system with the Federal Personnel Payroll System (FPPS), which provides automated notifications when an employees status changes. This has yielded positive results and NRC ethics officials continue to work closely with the Office of Chief Human Capital Officer (OCHCO) to ensure the timeliness of FPPS updates. In CY 2025, the DAEO and ADAEO also provided OCHCO HR specialists with training on the

notification requirements and the importance of timely registering personnel moves. The DAEO and ADAEO continue to work closely with OCHCO management to identify further improvements.
Organizational and staffing changes. Government lapse in appropriations.
Following engagement with the Dept. of Government Efficiency (DOGE), large numbers of agency staff were placed on administrative leave pending RIFs and many participated in the Deferred Resignation Program. As a result, many remaining staff were detailed to different offices and roles and others were given temporary NTE promotions to cover staffing shortages. Due to staffing shortages within the Office of Human Capital (OHC), these promotions/details/assignments/etc., have often been processed retroactively. As the Agency and OHC adjust to staffing levels, there has been greater formalization of the acting/roles and greater effort by the Agency to capture the staffing adjustments to capture new financial disclosure obligations.
We receive monthly reports containing the names and billet information of DIA employees assigned to public and confidential filing positions from the DIA Office of Human Resources (OHR). The ethics program works closely with OHR to update and validate these records. However, there are confidential filers outside of certain billets that are determined and assigned by the leadership of various work centers across the agency. The work center POC(s) typically work with the ethics program to ensure the filers are assigned correctly in FDM.
The responses to this question ran the gamut of "in all cases" to "not applicable". For "never", it was because positions are often times not coded properly, or the HR office notifies after the 15-day deadline, as well as HR offices simply not notifying the appropriate office, despite repeated attempts. Thus, "in most cases" is the best answer, but does not allow for an explanation.
Confidential financial disclosure is decentralized at DOJ. HR is not necessarily the primary source of information to ethics officials about confidential filers. Although HR provides new hire lists to ethics officials, HR does not track or implement confidential financial disclosure or collect reports. Ethics officials identify new confidential filers by other means.
Only one filer with IMLS was brought onboard in 2025. Detailees from DoL were presumed to have filed in their home agency.
In light of the deferred resignations and OPM data calls, new hire/promotion reports became less of a priority. Additionally, there were very few new hires and promotions in 2025 pursuant to the Administrations directives.
HD does not notify OGC Ethics of confidential filer appointments, the first line supervisor notifies our team.
We have no confidential filers
The NRC has taken positive steps in this area since CY 2024, but timely notification of appointments and terminations in covered filing positions continues to be a challenge for our program. The situation was exacerbated in CY 2025 by a high volume of personnel actions across the agency, including temporary or acting appointments to vacancies, as well as atypical challenges such as the extended lapse in appropriations and staffing changes under the Deferred Resignation Program. In CY 2025, our ethics teams worked with contractors to complete integration of the NRCs Ethics Gateway system with the Federal Personnel Payroll System (FPPS), which provides automated notifications when an employees status changes. This has yielded positive results and NRC ethics officials continue to work closely with the Office of Chief Human Capital Officer (OCHCO) to ensure the timeliness of FPPS updates. In CY 2025, the DAEO and ADAEO also provided OCHCO HR specialists with training on the notification requirements and the importance of timely registering personnel moves. The DAEO and ADAEO continue to work closely with OCHCO management to identify further improvements.

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))?

The former agency Chairman was the only termination filer. Notice isn't necessary in an agency with 10 FTEs.
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 Dept of Interior. She is aware of all appointments.
See comment to # 28.a, above.
Due to the size of the agency, the DAEO is aware of every departure.
There were no terminations of public financial disclosure positions during the reporting period.
In 2025, USARC did not have any terminations of public filers.
No public filer was terminated in 2025
Due to the structure and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant terminations.
There were no changes or additions to personnel.
The agency employes 50 or fewer employees annually on average, so the DAEO and ADAEO are aware of departures in advance.
The Office of the General Counsel, not Human Resources, track terminations from public and confidential filing positions.
No one was terminated.
We did not have a termination of a public filer.
In 2025, none of FCSIC's Public Financial Disclosure filers terminated employment.
No terminations from public filing positions in 2025
Our DAEO is the only filer
There were no terminations of public filers in 2025.
We handle these terminations notifications internally, not through the HR dept. We did not experience any of these in 2025.
No terminations in 2025.
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.
DAEO is aware of all changes to employment that would impact financial disclosure reporting requirements/changes.
No public filers were terminated during 2025.
No terminations during this time period
DAEO directly handled the terminations from public financial disclosure filing positions.
Only one such termination who was the DAEO
This scenario did not occur during the year.
no terminations in 2025
The Commission is a federal-state partnership with the federal side having one employee, the DAEO. The Commission itself, is non-federal.
Not applicable, No positions meeting the C.F.R.§ 2638.105(a)(2)) requirement were terminated.
Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for the Agency ethics program between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September

2025 and current staff lack access to legacy data therefore the foregoing numbers are based upon available information.
There were no terminations from filing positions in 2025.
The Ethics and Compliance team obtains a report from Human Resources database on a weekly basis. The Postal Service broadly announces the departure of officers.
Our agency is very small, and the DAEO is generally aware of all new employees terminated by the agency. The two public filers that left were the president of the agency and the DAEO who told the ADAEO directly.

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))?

As stated above, the Agency experienced many staffing difficulties over the past year. Particularly, the Office of Human Capital (OHC) experienced overwhelming demand in processing hundreds of applications for the Deferred Resignation Program (DRP), along with placing staff on administrative leave and other separations. As a result of several ongoing opt-in periods and alterations to paperwork, off-boarding paperwork and notification was delayed. The Agency and OGC did actively work to collect termination reports prior to departure when informed, but in some cases this notification of departure did not occur within 15 days.
The responses to this question ran the gamut of "in all cases" to "not applicable". For "never", it was because positions are often times not coded properly, as well as HR offices simply not notifying the appropriate office, despite repeated attempts. Thus, "in most cases" is the best answer, but does not allow for an explanation.
Due to unexpected admin leave, DRP, and other staffing changes, HR was unable to provide consistent notification of termination of public filers.
The NRC has taken positive steps in this area since CY 2024, but timely notification of appointments and terminations in covered filing positions continues to be a challenge for our program. The situation was exacerbated in CY 2025 by a high volume of personnel actions across the agency, including temporary or acting appointments to vacancies, as well as atypical challenges such as the extended lapse in appropriations and staffing changes under the Deferred Resignation Program. In CY 2025, our ethics teams worked with contractors to complete integration of the NRCs Ethics Gateway system with the Federal Personnel Payroll System (FPPS), which provides automated notifications when an employees status changes. This has yielded positive results and NRC ethics officials continue to work closely with the Office of Chief Human Capital Officer (OCHCO) to ensure the timeliness of FPPS updates. In CY 2025, the DAEO and ADAEO also provided OCHCO HR specialists with training on the notification requirements and the importance of timely registering personnel moves. The DAEO and ADAEO continue to work closely with OCHCO management to identify further improvements.
Organizational and staffing changes. Government lapse in appropriations.
Departures from the Agency have been at extremely high levels in 2025.

Table 43: Q.33 Indicate for which forms your agency uses the “Other” e-filing system. Select all that apply.

Intelliworx

FDOnline/Intelliworx is our technology platform for 278e filers.
FDOnline
Board members (SGEs) are not required to use Integrity, based on a waiver received from OGE on 1/29/24. Board members provide the DAEO with electronic and hard copy forms of the 450 and 278e. Only the DAEO files his annual financial disclosure and transaction reports in Integrity.
CIA's e-filing system
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)
NASA's Ethics Program Tracking System (EPTS)
FDOnline
NSA's internal Financial Disclosure Reporting System (FDRS)
FDOnline for all three forms.
FDOnline/Intelliworx
FDOnline, however, Agency access to that system ended in October 2025.
FDOnline/Intelliworx

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

CIA's e-filing system
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)
NASA's Ethics Program Tracking System (EPTS)
FDOnline
NSA's internal Financial Disclosure Reporting System (FDRS)
FDOnline for all three forms.
FDOnline/Intelliworx
FDOnline, however, Agency access to that system ended in October 2025.
FDOnline/Intelliworx

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

FDM
Financial Disclosure Management (FDM)
E450. All 450 forms were filed on the E450 system except for two paper 450 forms submitted by employees who were on detail during the reporting period and several paper forms obtained from employees hired from other agencies this calendar year.
Ethics Management and Tracking System
FDOnline

FDonline
FDonline/Intelliworx
It is not a commercial product. CEQ refers to it as the ethics portal.
Army Financial Disclosure Management System.
Financial Disclosure Management (FDM) maintained by the Department of the Army.
The U.S. Army's Financial Disclosure Management (FDM) system.
Financial Disclosure Management (FDM) system, https://www.fdm.army.mil/
Financial Disclosure Management (FDM) hosted by the U.S. Army (https://www.fdm.army.mil/).
DLA uses Integrity for OGE 278 filings, but uses Financial Disclosure Management (FDM) for OGE 450 filings.
Financial Disclosure Management system (FDM)
Intelliworx FDonline
Army's Financial Disclosure Management (FDM) system.
Financial Disclosure Management System
Financial Disclosure Management System (FDM)
Financial Disclosure Management (FDM) electronic filing system
FDM
FDonline
FDonline
U.S. Army FM, FDonline, CBP HRBE (in-house developed program)
FDonline.
In 2025, e-filing systems used in components for OGE Form 450s included FDonline, SharePoint, Docusign and an internal USMS filing system.
Financial Disclosure Management System (FDM)
The DOI uses FDonline by Intelliworx for confidential financial disclosure reports (OGE Form 450).
DO and US Mint use SharePoint applications. IRS uses an Oracle PeopleSoft application, to which DO and FinCEN adapted in December 2025. BEP uses a Salesforce application. OCC uses an Appian application. TIGTA uses FDonline.
Intelliworx Financial Disclosure Online
EPA Ethics continues to use its custom-built e450 system housed in the EPA's business application platform (BAP) with Salesforce. We were able to make updates to the form to reflect OGEs changes to the e450.
FD Online
In calendar year 2025, Confidential Financial Disclosure Reports, OGE Form 450, and Confidential Conflict of Interest Certification Forms, FCA Form 449, were electronically processed in a secure SharePoint system. SharePoint hosts fillable forms for both the OGE Form 450 and FCA Form 449. In December 2025, FCA implemented FDonline, a secure, software-as-a-service, e-filing system for the collection of OGE Form 450s and will no longer use SharePoint. In 2026, we will continue to use SharePoint for FCA Form 449s.
In calendar year 2025, Confidential Financial Disclosure Reports, OGE Form 450, and Confidential Conflict of Interest Certification Forms, FCA Form 449, were electronically processed in a secure SharePoint system. SharePoint hosts fillable forms for both the OGE Form 450 and FCA Form 449. In December 2025, FCA implemented FDonline, a secure, software-as-a-service, e-filing system for the collection of OGE Form 450s and will no longer use SharePoint. In 2026, we will continue to use SharePoint for FCA Form 449s.
FDonline

FDonline
FDonline Intelliworx Electronic Filing System
FD Online
The FLRA permits Confidential Financial Disclosure filers to submit their forms via email.
PowerApp
FDonline
The FTC uses FDonline to e-file most Confidential Financial (OGE-450) Reports. Occasionally, OGEs PDF version of the OGE Form 450 report is used instead.
e-OGE Form 450 filing system
FDonline
We use Integrity for all OGE-278e & OGE-278T reports. We use FD Online for OGE-450 reports.
NARA built a system in-house for this purpose.
FDonline
FDM
FDonline
eFile
FDonline
Ethics Gateway
450 Portal
Army's FDM
OMB Ethics Portal contains a Confidential Financial Disclosure (OGE Form 450) application.
Financial Disclosure Management (FDM).
Ethics Compliance Tracking System
Financial Disclosure Management (FDM)
FDonline (HRWorx).
Confidential Financial Disclosure System (CFDS)
Financial Disclosure Management (FDM), www.fdm.army.mil
FDonline.
Financial Disclosure System (FDS)
Sharepoint and Box
FDonline
Board members (SGEs) are not required to use Integrity, based on a waiver received from OGE on 1/29/24. Board members provide the DAEO with electronic and hard copy forms of the 450 and 278e. Only the DAEO files his annual financial disclosure and transaction reports in Integrity.
CIA's e-filing system
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)
NASA's Ethics Program Tracking System (EPTS)
FDonline
NSA's internal Financial Disclosure Reporting System (FDRS)
FDonline for all three forms.
FDonline/Intelliworx
FDonline, however, Agency access to that system ended in October 2025.
FDonline/Intelliworx

Table 46: ADDITIONAL COMMENTS FOR PART 7.

<p>Three employees filed via 450pdf because they were not able to get into the system. The agency had 4 employees leave after they filed their respective 450s.</p>
<p>All responses in this questionnaire directed to the DAEO have been answered by the ADAEO. Question 28b - For confidential filers the ADAEO is notified by the officers other than HR, these notifications can sometimes lag, we are working with those offices on more timely notifications. Question 29 - The ADAEO receives a report of anticipated separations every 2 weeks. Question 35 - The responses in this section are for the calendar year.</p>
<p>Q30: Two employees filed the Excel version of the OGE 278 when submitting their termination reports due to inability or unwillingness to use the Integrity two-factor authentication app.</p>
<p>35(b) - 395 is the total number of staff obligated to file during the OGE 450 filing period, including staff that later participated in the Deferred Resignation Program (DRP) or were otherwise placed on administrative leave. If this report is to only include staff that remain at the Agency as of December 31, 2025, this number of filers would be 232.</p>
<p>In our questionnaire last year, we inadvertently reported in 35a. the number of our 278e filers. After closer reading of the question, and the note to exclude Integrity filers, we now report 0. All of our public filers submit through Integrity.</p>
<p>Question 34b: As the Department of War (DoW) Executive Agent for the FDM filing system, the Department of the Army fully funds FDM for all DoW agencies from Army appropriations.</p>
<p>We lost a large number of 450 filers due to DRP</p>
<p>Question 30: All OGE 278 reports were filed electronically using Integrity. Four OGE 450 filers are Special Government Employees (SGE) and do not have a Common Access Card (CAC) to access FDM to file electronically and no instructions have been provided on how to approve their login requests for the Login.gov option in FDM. Those four are not included in the confidential filers number as they did not file electronically in CY 2025.</p>
<p>#35a: All public financial disclosure filers use Integrity and are not included, bringing the total to 0.</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“ The OGE 450 PDF form is used for SGEs who do not have access to electronic filing systems. The OGE 278e & 278-T Excel spreadsheets are used as worksheets for individuals awaiting onboarding or system access. A 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.</p>
<p>Q31: In addition to electronic filing, confidential filers use a mix of pdfs emailed to an ethics official or pdfs completed on a computer then printed, signed, and submitted in hard copy to an ethics official.</p>
<p>#30 and 31 -- Two public filers who were no longer at EPA were stymied by INTEGRITY and two-factor authentication. EPA Ethics permitted them to submit their reports in hard copy instead.</p>
<p>For question #30 and #35(b), we had 52 OGE Form 450 filers file electronically. Two OGE 450 filers had to file by paper because the SharePoint system for e-filing experienced technical difficulties. Additionally, we had 17, new employees file the Confidential Conflict of Interest Certification Form, FCA Form 449, electronically.</p>
<p>Q35: One Confidential Financial Disclosure Filer, OGE Form 450 filed in calendar year 2025. Three employees are Confidential Conflict of Interest Certification Form filers, FCA Form 449. However, we</p>

collect FCA Form 449s once every three years from incumbents, and calendar year 2025 was not a collection year.
Re: Question 31, FHFA-OIG does not use FD Online. Instead, their employees file the OGE 450 in .pdf format.
Question 30: 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 version of the report is maintained in EPTS. In 2025, more reports were filed non-electronically than usual mostly due to the higher number of departures. Question 31: Because NASA only accepts non-electronic submissions episodically as needed, NASA does not encourage the use of any non-electronic form type. The pdf boxes for each form type were checked as that is the file type in which non-electronic submissions are typically received.
Question 30--In 2025, NARA transitioned to an electronic filing system for OGE 450 filers. During the transition, some OGE 450 filers continued to file using the PDF.
Note that NCUA operates on a calendar year fiscal year, so FY2025 numbers correspond to CY2025.
34(a): This is the amount we pay FDonline for both public and confidential filers.
#35 " Data is not included/ is classified.
#35: All public filers filed in Integrity.
35. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required.
#35, OA files by calendar year, please refer to that question.
Q.34: We migrated all 450 filers to FDM in 2025. Payment for FDM is not due until FY2026.
Question 35 - since all our public financial disclosure filers are on Integrity, we put 0 ("exclude filers in INTEGRITY"). Should the question read "filed electronically on a system other than Integrity"?
only the DAEO files his annual financial disclosure in Integrity
Q33. In our Confidential Financial Disclosure System (CFDS), we use a modified version of the 450 (pdf).
34a. The amount listed for Public and Confidential represents the total amount and should not be aggregated.
34a. The cost for FDonline is per filer, there is no difference in per filer charge for a 278e filer or a 450 filer.
The Agency currently does not have access to FDonline for confidential filer information for 2025.

PART 8. PUBLIC FINANCIAL DISCLOSURE

Table 47: Q.36 Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2025, excluding SGEs, and the number of reports actually filed (i.e., received) by December 31, 2025.

<p>Four employees whose termination reports were not due until January of 2026, filed their reports in December of 2025. Additionally, two employees whose termination reports were due during the 2024 calendar year, did not file reports until calendar year 2025, due to delay in notification from Human Resources, regarding their return from a temporary position. Lastly, one employee whose new entrant report was due in calendar year 2025, did not file until January of 2026, due to delay in notification by Human Resources.</p>
<p>For discrepancies in Annual Filers, the individual was placed on administrative leave prior to the Annual Filing period. For discrepancies in required termination report, the individual was assigned a report but transferred to another Federal agency prior to submission.</p>
<p>Q36.b.&c.: The Annual & Termination Report not filed timely are from the same filer, a servicemember. In light of his retirement (29 May 2025), the Ethics Program requested the Air Force issue the filer a combination report however, they declined and the filer was issued both an Annual & Termination for filing in 2025. Prior to his retirement, numerous attempts were made to contact the filer. After retirement, the Ethics Program had no contact information for or contact with the filer until he got in touch with the Ethics Program, in the Fall of CY25, to request post-Government employment advice. At that point, the filer was without a CAC and the Ethics Program assisted in getting him set up in Login.gov using his personal email address and coordinated with Integrity to make that update and merge the reports. Reports were filed on 20 & 21 January 2026. The Ethics Program will coordinate with the Air Force on the assessment of any fines.</p>
<p>The extended government shutdown presented problems in terms of accessing the system and many filers joined in the last two months of 2025. We are worked with them to get their reports into the system as required.</p>
<p>#36c: The discrepancies are due to political appointees and employees who opted in to the designated resignation program and voluntary early retirements departing without filing. DOJ referrals are in the works for those filers.</p>
<p>A few filers failed to respond to a request to file. Ethics offices are continuing to engage the filers.</p>
<p>The missing termination reports were DRP personnel leaving between October and December of 2025. We have tried to work with their supervisors to make contact with them. However, we have notified them that if they cannot make contact with them, we will need to begin the process of referral to DoJ. One of the new entrant missing is filing late due military operational considerations. The second missing new entrant report was a detailed to the position on 01 November 2025 for 120 days. However, HRC did not notify Ethics until December and the report was assigned early January 2026, when the report was assigned to the employee.</p>
<p>Seven filers have requested extensions for their OGE 278 reports which were due in CY2025. Therefore, they have not yet filed their reports.</p>
<p>Significant turnover of personnel, extended government closure due to lapse of appropriations, and staffing shortages.</p>
<p>Due to agency reorganization, the entire OGC Ethics Division was placed on administrative leave pending RIF on March 11, 2025. For the rest of 2025, the new ethics team attempted to triage ethics compliance, but all aspects of the ethics program experienced backlogs and delays. The shutdown also exacerbated these backlogs.</p>

DOE continues to follow up on reports not yet received in accordance with public financial disclosure report procedures.
Filer noncompliance. In one component, many ethics officials were subject to personnel actions and were thus unavailable to track filing compliance. In addition, HR staff were similarly subject to personnel actions and were unavailable to notify ethics officials when there were changes to filers status. Components are working to collect missing reports.
1 New Entrant, NCSES required to file but have not. Filer has transferred to filing position with another agency and is currently on extended medical leave. 3 Termination Reports required but not filed. Filers are late but within their "grace" period and are working with them to submit.
Still working with filers (mainly those that have left the agency) including locating them, and numerous reminders have been sent.
Some filers left DOJ on RIF or DRP or during the government shutdown without notice to ethics officials " they did not file their reports before leaving and may have encountered complications accessing the Integrity system after leaving. Employees acting in vacant covered positions may have mistakenly been assigned reports which are now showing as unfiled. Some new filers joined without timely notice to ethics officials. Communication delays with HR and with covered employees were exacerbated by the government shutdown and by staffing changes and agency reorg. Integrity system data showing outstanding reports is under review and outstanding reports will be pursued. EOUSA: New Entrant report discrepancies were greatly affected by the government shutdown. Term Report discrepancies are due to large numbers of filers leaving under the DRP or during the shutdown without notice to ethics officials, preventing timely and accurate report assignment and collection.
Given staffing levels at the department, measures to ensure compliance took longer than typical. Given turnover resulting from the deferred resignation program and other unanticipated departures, some reports were not filed during the calendar year.
Due to the Deferred Resignation Program, extended Government Shutdown, Reorganization and subsequent RIFs, we are still seeking clarity on the employment status of a number of filers to determine which reports they are required to file. The Department's Ethics Office continues to follow-up about missing reports and will refer filers as appropriate as soon as possible.
Some filers who took the DRP had access issues with Integrity and have been working with support to gain access.
8 filers were late in filing their reports. We are working with the filers to get them submitted.
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 to address delinquent filers.
For the Termination Report, EPA Ethics did not receive notification of the termination of a detail, but the career SES employee has since filed the report. The New Entrant report was also a detailee who was not notified earlier of the need to file the report in 2025, but has since taken care of this requirement.
One report is overdue. Filer has been notified.
A small number of financial disclosure reports were not collected during the required timeframe due to employee separations that occurred before filing was completed. These separations included individuals affected by a reduction in force or retirement.
One employee left under the Deferred Resignation Program and failed to follow the Agency's exit protocol, including an ethics debriefing where a termination report is issued to the employee.
We are following up the small number of discrepancies. Several forms not filed in 2025 were filed in 2026.
One termination filer received an extension to file in calendar year 2026.

The discrepancy between the number of reports required to be filed and the number actually filed resulted from NEH granting the new entrant an extension.
Filer dealt with extended illness during period filer was supposed to file a new entrant report. Filer then filed termination report and additional information was requested on that report which was returned to filer. Filer has been reminded to also file new entrant report.
36. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required.
Ethics officials are working with all delinquent filers to complete their financial disclosure reports.
One annual report has yet to be filed by an employee who accepted the Deferred Resignation Program and whom we have been unable to contact. One new entrant report due in CY 2025 has yet to be filed by an individual at the time of this submission.
A few employees received extensions due to the government shutdown. Additionally, one employee departed without submitting a termination report.
Organizational and staffing changes. Government lapse in appropriations.
Filer no longer federal employee agency continuing attempts to notify filer of assigned report.
Due to staffing changes and overwhelming activity during the administration transition, the ethics team was unable to send periodic reminders to filers to file their OGE Form 278e. Additionally, identifying public filers was challenging due to the volume of transitions of staff in and out of Acting leadership roles.
Two PAS SGE filers were terminated from their positions effective January 23, 2025, however, each of these filers is contesting their termination in federal court and unlikely to complete the assigned Termination Reports until the litigation is resolved. These two PAS filers were also assigned 2025 Annual Reports one of these filers filed the 2025 Annual 278, but the DAEO will not act on it until the litigation is resolved.
In 2025, there were an unusually large number of personnel changes. The SEC Office of Human Resources (OHR) failed to timely notify the Office of Ethics Counsel (OEC) when two employees who were temporarily acting as senior officers stopped acting as senior officers and returned to their regular positions. As a result, two termination reports that were required to be filed in CY 2025 were not assigned until CY 2026. OEC has discussed this issue with OHR and enacted internal procedures to ensure that this issue does not reoccur.
Human Resources did not notify Ethics Law of two New Entrant filers. One termination filer did not respond after leaving the agency.
Four 2025 New Entrant report filers were discovered in December 2025. 2 of those 4 filed before 12/31/2025.
Large numbers of personnel leaving at the same time.
Q36c. One employee has yet to file a termination report. WHO is working with the filer to complete their report.
The DAEO did not file an annual report because they were put on administrative leave and then RIFed in March/April. When they were brought back on staff via a district court order, they immediately resigned from their position at USADF and filed their termination report instead. The ADAEO was also put on administrative leave and RIFed in March/April and was not brought back until August. In December, the ADAEO lost access to all official systems again and has been unable to file their annual report.

Table 48: 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.

Technical difficulties with electronic filing system. PAS's report reviewed and closed shortly after 60 day window.
Agency lost track implementing Rift/Reorganization plans pursuant to the Department of Government Efficiency Workforce Optimization Initiative.
Two filers whose termination reports were due in CY2024, did not file until CY2025, due to miscommunication with Human Resources staff regarding filers' temporary promotion status. As a result of the Deferred Resignation Program and the large number of departing employees during the annual filing cycle, initial review of some was slightly delayed.
Some reports were reviewed more than 60 days after submission due to staffing difficulties, large numbers of reports being reviewed during one period, and over lapping of review period with government shutdown.
Additional information was being sought
DISA OGC overall lost 25% of its staff to DRP & VERA/VSIP with the Administrative Law & Ethics Team losing 60%, to include the Ethics Program Manager (PM), the Associate General Counsel for Administrative Law & Ethics, and a GS-12 attorney. The prior Program Manager and the prior Associate General Counsel handled all aspects of OGE 278 Public Financial Disclosures, to include the technical and legal compliance. Additionally, there were more OGE 278 reports in CY25 than in the prior year (with more personnel changes among SESes) with fewer personnel to manage them. Q37c.: The Career SES termination report not certified in 60 days was a public filer who was on medical leave without pay, pending disability retirement related to a cognitive impairment, and obtaining information/clarification was a challenge.
For the reports that were not initially reviewed within 60-days, the delay occurred for the following reasons: lack of personnel during a 43-day lapse in appropriations delay in supervisory review (required by the Joint Ethics Regulation) and 1 “2-day administrative oversight. For many of the reports for which we did not meet the 60-day certification and closing dates, the filers either needed to provide additional information or complete an amendment before the report could be certified and closed.
The filer’s reviewer was newly appointed to the position, had trouble gaining access to the Integrity filing system, and was on official travel for several weeks. These factors made the timely reviewing and certifying of the one late report reflected above problematic. Ultimately, the report was reviewed and certified 3 days over its suspense date.
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.
37 a-d: Some reports were reviewed more than 60 days due to additional information being sought in some cases, remedial action being taken and reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.
Government shutdown lack of ethics counselor manpower due to DRP, retirements, and resignations lack of timely supervisory reviews incorrect contact information for filers and turnover of personnel.
We experienced an increase in reports certified outside of 60 days due to DRP and ethics official reassignment as well as the government shut down (particularly with respect to new entrant reports).
Due to a turnover of ethics officials who took DRP or left Federal service in an expedited fashion, a report was not always immediately reviewed by an ethics official following submission. Also, some ethics officials did not realize they should end initial review on the report when they sent the first round of questions to filers. Some ethics officials waited to check that the end of the initial review was complete after the filer had responded to numerous requests for information and active communication occurred. We are working to educate ethics officials to correctly indicate the end of their initial review in INTEGRITY.
Significant turnover of personnel, extended government closure due to lapse of appropriations, delays in supervisor reviews, system/technical issues, and staffing shortages.
Agency reorganization and government shutdown significantly impacted timeliness of ethics team in reviewing financial disclosure reports.
Reports initially reviewed more than 60 days after submission because ethics staff were working on other priority items, including the review and certification of Nominee reports, Ethics Agreements, and other PAS ethics documents. Additionally, ethics staff experienced a significantly increased workload and decreased staffing due to the Deferred Resignation Program, which impacted timeliness of review.
In many components, all ethics officials were placed on administrative leave, and the components did not select alternate employees to fill ethics roles until more than 60 days after reports were filed. Those alternate employees did not have experience and took time learning how to review financial disclosure reports.
One component was extremely short staffed (1 attorney) conducting all reviews.
Significant increase in ethics official financial disclosure workload due to Presidential transition, the DRP, early retirement offerings and filer/workforce turnover. There was significant turnover and vacancies in ethics staffing affecting financial disclosure review timeliness. FBI: High volume of 278 filers with limited staffing. Sudden and dramatic increase in ethics official workload. FBI continues to address ways to refocus efforts for more timely reviews. EOIR: Due to significant turnover among filers that increased the number of filers and staff turnover in and shortage of reviewers, some reports were not reviewed within 60 days. Oldest reports were prioritized. More staffing is needed. OLP: Filer could not be reached during extended leave and government shutdown to provide additional information and needed extended time to provide required information.
Staffing shortages increase review and certification time for all reports.
the substantial reduction in L/EFD staff that continued steadily from 11/2024 through the Fall of CY2025
One report was reviewed more than 60 days after submission due to both a decrease in DEO staffing and a tracking oversight.
Personnel losses and furloughs delayed the initial review of certain submissions.
In all cases, the Ethics Official did an initial review of the report within 60 days, but needed further information from the filer before the official could sign off on the report.

<p>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 to address delinquent filers.</p>
<p>Despite having lost a senior ethics attorney to the DRP, EPA Ethics reviewed the vast majority of public reports within 60 days. Given the sheer volume of other ethics issues we faced, we were simply not able 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. Even so, only two reports fell outside of the 60 day review window.</p>
<p>Two reports showed an initial review date more than 60 days after submission. The two filers at issue here were difficult to get ahold of, one of which was in an employment dispute with the agency, causing delay. Judging by internal conversations and meetings, the two reports were in fact viewed before 60 days and were being worked on, it's just that the initial review criteria may not have been fully satisfied or the initial review date in Integrity just wasn't selected until 60+ days after submission.</p>
<p>Additional information was being sought.</p>
<p>Delays were due to the need for additional information from filers. In addition, unanticipated operational changes, including staffing transitions, affected the review process.</p>
<p>One report was reviewed more than 60 days after submission due to a variety of factors including Integrity log-in issues prior to furlough, and the lapse in appropriations from October 1 to November 12, 2025.</p>
<p>Due to the deferred resignations, the Ethics team lost a program officers responsible for sending out filing reminders and review 450s and 278s, which left us with only two people reviewing the filings while consulting with employees leaving the agency and managing our increased work load. Additionally, some of the filers took the Deferred Resignation Program were slow to respond to our inquiries.</p>
<p>Additional information being sought from filers, including new filers transitioning from private sector with more technical reporting questions. Confluence of increased workload due Deferred Resignation Program and staff departures.</p>
<p>NSF went through 3 rounds of DRP in 2025 and ethics resources were diverted to provided exit briefings and post-employment advice. Terminations were also rescinded and OGC resources had to be diverted due to unprecedented litigation and the review and cancellation of thousands of grants. NSF also experienced a 6-week stoppage in ethics work due to the shut-down. NSF was also forced to rapidly vacate its premises in December.</p>
<p>TOTAL i. 99.8%, ii. 97%, and iii. 94%. 37. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. The Agency continues to surge resources to complete timely financial disclosure reviews. Where reports were reviewed outside the 60-day time-frame, it was due to competing mission priorities. In addition, some forms were held for review by the supervisor for much of the 60-day review period. Efforts are being made to address this going forward.</p>
<p>The delay in reviewing reports was primarily caused by staffing turnover, but also due in part to the government shutdown.</p>
<p>A small number of reports were reviewed after 60 days due to the 42 days lost to the government shutdown.</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. The shutdown, greater than expected arrivals and departures, together with excessive workload resulted in some unexpected delays.</p>

Due to the government shutdown, several new entrant reports were reviewed and certified beyond the 60-day timeframe. In addition, a number of filers were first-time filers and required technical assistance and follow-up, which contributed to delays.
Several reports required substantial edits, resulting in continued communications with filers past the 60-day deadline. Additionally, significant personnel realignments within the agency and Ethics office resulted in delays in identifying initial reviewers with the best knowledge within each organization to identify conflicts.
Due to staffing changes and overwhelming activity during the administration transition, the ethics team was unable to review all of the OGE 278e forms within 60 days.
Departure of agency's DAEO and ADAEO and transition of their duties.
government shutdown and DRP
Reviewed more than 60 days after submission due to agency reorganization and transfer of personnel between components.
Additional information was being sought. In addition, competing priorities and workload challenges resulted in some reports being reviewed and certified more than 60 days after submission.
Some reports were held for additional time for additional information being sought, for remedial actions pending, and also due to staffing shortages due to several personnel departures early in the year. A close look at the dates in the system shows that these reviews were mostly recorded between 61-64 days.
manpower shortage
High volume of new and complex filings which required additional guidance, review, and follow-up.

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.

Technical difficulties with electronic filing system. PAS's report reviewed and closed shortly after 60 day window.
Some reports were certified more than 60 days after submission due to staffing difficulties, large numbers of reports being reviewed during one period, and over lapping of review period with government shutdown.
There were no other delays. The certifier was working with the reviewer and the report was certified on the same day it was reviewed.
One report was reviewed more than 60 days after submission and therefore certified more than 60 days after submission due to a variety of factors including Integrity log-in issues prior to furlough, and the lapse in appropriations from October 1 to November 12, 2025. One report, although reviewed within 60 days, was certified by OGE more than 60 days after submission, possibly due to the lapse in appropriations.
See above.
Due to staffing changes and overwhelming activity during the administration transition, the ethics team was unable to certify all of the OGE 278e forms within 60 days.
Technical Issues with filing system

Table 50: ADDITIONAL COMMENTS FOR PART 8.

Q41: Technically, only one Form 201 request was received. The second was a FOIA request and the requester was directed to OGE's online database of PAS public filers.
Q36: The agency DAEO is listed under the PAS category, because review of that report is required by OGE and placing the DAEO under the PAS category automatically routes the DAEO's report directly to OGE, for review. The DAEO for the CFTC is not politically appointed or Senate confirmed.
Q 36: The 1 filer in the "other" category is a GS-15 employee who began acting in a career SES position in 2025 and filed an OGE 278 form because she was expected to act in the position for more than 60 days. Q 37 b and c: Three PAS officials left the agency before the May 15 filing deadline. One filed the annual report and also filed a termination report. The other two left the agency before filing the annual report. OGE advised that they should only file a termination report.
Two termination reports that were due in 2025 were for employees that retired on 12/31/25 and submitted their termination reports in 2026. Both of these reports were certified in January 2026 within the 60 day limit.
41. Although we received an OGE 201 request, the request was for an individual that was never an OGE 278 filer at DLA.
We have an individual who requested information through FOIA. We responded and told them how to fill out the OGE Form 201s and never heard back from them.
Q40 - Ethics officials are still in the process of taking remedial actions for public financial filers who failed to file in CY 2025.
Due to agency reorganization, the entire OGC Ethics Division was placed on administrative leave pending RIF on March 11, 2025. For the rest of 2025, the new ethics team attempted to triage ethics compliance, but all aspects of the ethics program experienced backlogs and delays.
Q39: Due to the high volume of public filers, FBI ethics office is working on improving its late fee waiver process and documenting same in Integrity. Q42: Responding to requests for DOJ ethics documents is decentralized. The total number of documents released by all components throughout the entire Department under EIGA in 2025 was not uniformly tracked. DEO released approximately 350 ethics documents in 2025.
##41-42 Due to a substantial lack of staffing in the Department Ethics Office, we are still in-process with responding to some latter half of CY2025 OGE Form 201 and Ethics in Government Act document requests.
Question 37. One annual SES 278e was not certified until January 2026. One non-career SES new entrant 278e filed in 2025 currently is under agency review.
Q 42: The Commission does not track this information so number of documents is unknown.
Numbers 36-37. In 2025, the agency's Integrity Administrator and Alternate separated from GSA and these roles were reassigned. During this transition, several filers were inadvertently assigned to the wrong filer categories. As a result, this may account for any discrepancies from OGE.
Question 37: The number of Termination reports certified in 2025 is lower than the number of Termination reports filed due to filers who separated on 12/31/25. Reports filed as of 12/31 were not certified until CY2026. Question 39b: 2 late filing fee waivers were granted in connection with reviewing transactions disclosed on OGE Form 278e reports that were subject to earlier reporting on an OGE Form 278-T. These waivers have been counted as waivers for OGE Form 278-T reports because the OGE Form 278e reports were filed timely. 2 additional late filing fee waivers were granted for CY2025 278e reports, but they were not granted until CY2026 so they have not been included in this total.

#36 - #39 Data is not included/is classified.
#39. To support NSF's transition from eFile to Integrity for public financial disclosure reports in early 2025, all annual public financial disclosure report filers were given a 45-day extension.
Q41 and Q42: Numbers reported are for those requests relating only to OGE employees. In CY2025, OGE also received a total of 9,995 requests for public reports and released 17,991 documents under EIGA relating to all executive branch employees.
IPEC did not receive any Form 201s in CY25
(41) This was a request under the Freedom of Information Act.
The majority of requests for public financial disclosure reports we receive via the OGE Form 201 is for TVA's Board Members. However, TVA's Board Members are Special Government Employees and work less than 60 days in a calendar year so they file the OGE Form 450, which is not disclosable under EIGA.
Due to the cessation of normal Agency operations in January 2025, and the subsequent departure of all former full-time staff responsible for the Agency ethics program between February and September 2025, collection of data was interrupted and then ceased. Current ethics staff took over in September 2025 and current staff lack full access to legacy data therefore the foregoing numbers are based upon available information, but may not fully reflect aggregate numbers for 2025. In particular, certification of Form 278 reports was interrupted due to departure of staff. Zero was entered as necessary for submission, but does not reflect data.
Q41. WHO financial disclosure reports are uploaded periodically on www.whitehouse.gov/disclosures/ .
The DAEO and ADAEO, along with most of USADF staff, were put on administrative leave and then RIFed for many months last year. After the ADAEO was brought back in the fall, they were able to certify the DAEO's termination report. Due to technical issues, the ADAEO had not been able to certify the president's termination report. In December, the ADAEO, along with all the remaining USADF staff lost access to all email, Teams, SharePoint, and financial systems as well as to the physical office space.

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

Table 51: Q.43 Report the number of confidential financial disclosure reports required to be filed by December 31, 2025, excluding SGEs, and the number of reports actually filed by December 31, 2025.

Explanation of Discrepancies: One of the employees who failed to file subsequently left the Bureau. The other employee who failed to file was on health-related LWOP status for all of CY 2025.
Discrepancies are due to inconsistencies in notification from the Office of Human Capital (OHC) in offboarding and tracking individuals in the separate filing system. This also includes difficulties in tracking individuals on administrative leave during the Annual filing period.
One of the filers was not assigned a new entrant report by December 31, 2025 due to administrative error. The report has since been assigned and certified at the time of this submission.
Discrepancy due to filers receiving late notification to file.
The Administrative Law & Ethics Team lost 60% of its personnel, to include the Ethics Program Manager (PM), the Associate General Counsel for Administrative Law & Ethics, and a GS-12 attorney. The prior PM was the primary for tracking and following up with filers to provide suspenses and get reports completed. Additionally, there were more OGE 450 reports in CY25 than in the prior year with fewer personnel to manage them. Despite these hurdles, all but two reports were filed. Both filers' reports were assigned/due in October/November (during the Government shutdown) which necessarily caused delays. We have made repeated attempts to contact the filers and their leadership. We continue to escalate and will take action as appropriate.
5755 people filed reports. There was one person that has not yet filed.
A new filer was discovered during the beginning of the annual filing season in January 2026. That filer is a military servicemember who is stationed overseas and whose unit underwent reorganization at the end of 2025. Upon discovery, the filer immediately filed a report, and it was certified on January 28, 2026.
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.
The discrepancies are due to additional information being sought in some cases and reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.
Due to government shutdown, reports were not timely filed despite reminders, still did not complete even with extensions personnel moving between organizations and organizations not updating FDM lack of internal oversight and defined responsibilities and filers did not receive notification to file.
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)
Some filers are still working on submitting reports, and have not yet filed. Some filers were erroneously assigned reports, but were no longer with the agency. The ethics team is working to remove any erroneous reports that should not have been assigned.
One individual was given an extension due to paternity leave and during the paternity leave they took the DRP and did not return to the agency. We attempted to get him to complete the form but our attempts were unsuccessful. He was a remote worker. His form was administratively closed with comments.

Significant turnover of personnel, extended government closure due to lapse of appropriations, and staffing shortages.
Two filers on long term admin leave three filers on long term military leave. Remaining employees opted into DRP and separated after 2/15/2025 but never submitted annual reports.
Filer noncompliance. Administrative oversight when existing employees were promoted into filing positions. In many components, most or all ethics officials were placed on administrative leave and were thus unavailable to track filing compliance. Administrative oversights that have been identified are being remedied.
Required filer was on extended sick, admin and military leave through 2025.
Both of the filers were on extended medical leave for the entire reporting period. One is still on long term medical leave, and the other employee left the agency.
Some employees filed even though they were not required to. Total OGE Form 450s filed: 15,863
Employees who were required to file and did not were on extended leave.
Some of these reports were filed in January 2026. We are following up on other reports that were due fall/winter 2025. Given the Deferred Resignation Program, extended Government Shutdown, Reorganization, and RIFs, we are still working to confirm that the outstanding reports were appropriately assigned and are required.
Some filers left the agency before they finished their report. Other filers were on medical leave and were granted an extension.
At TTB, during a review in January 2026 of the filers against the employee list, the ethics office determined that 4 employees who were not designated to file in CY2025 should have been so. These four were assigned New Entrant 450s and two have already been returned. At FinCEN, an employee was on long-term leave and then separated from the agency.
One required filer has been on extended sick leave.
12 filers left the agency and one filer died before completing their reports.
Employees left the Commission, or on maternity leave, detail, military leave, sick leave or deceased.
1 military duty, 2 extended sick leave, 1 extended administrative leave
Several employees took the Deferred Resignation Program before the deadline.
We are following up to address the small number of OGE Form 450's not filed. The number of required forms in Q.43(a) also includes the number of alternate forms.
43a. this is protected information. 43b. 99.9% 43. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. One filer is on extended medical leave.
One filer is on paternity leave and has been unable to file a New Entrant OGE 450 Report.
One employee elected to take the Deferred Resignation Program (DRP), were placed on administrative leave while awaiting their resignation from Federal Service and were no longer reporting to the office.
Due to staffing changes and overwhelming activity during the administration transition, the ethics team was unable to send periodic reminders to filers to file their OGE 450 forms.
Due to the cessation of Agency operations in January 2025, departure of staff throughout 2025, and current lack of access to the e-filing system FDOonline that was used until October 2025, responsive data is unavailable.

Table 52: 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.

Agency staff transition occurred during the reporting period and the new DAEO was not formally designated until after the initial 60 day period.
Some reports were reviewed more than 60 days after submission due to other Agency matters (such as the Deferred Resignation Program, placement of 80% of staff on administrative leave, and federal litigation) requiring immediate attention.
One employee failed to file the OGE 450 on time. This was addressed with agency leadership.
Due to critical personnel shortages, impacts of DRP organizational realignments, and significant underlap of transition for ethics counselors as well as our difficulties accessing FDM and delays attributable to filers, the ethics review process was delayed for several reports.
There were more OGE 450 reports in CY25 than in the prior year with fewer personnel to manage them. The Administrative Law & Ethics Team lost 60% of its personnel, to include the Ethics Program Manager (PM), the Associate General Counsel for Administrative Law & Ethics, and a GS-12 attorney. At DoW, part of the review chain requires that the filer’s supervisor review and sign the report confirming that there is no conflict of interest between reported financial interests and reporting individual’s current and anticipated official duties. Supervisory review must be conducted within 14 calendar days of filer submission. It is a significant challenge tracking and ensuring supervisor compliance with that requirement to ensure timely review/certification. The prior PM, who took DRP, was the primary for tracking and following up with filers and supervisors to get reports filed and signed.
13 reports were not certified timely and 19 reports are pending certification. Of those reports not certified timely, some were awaiting more information. Additionally, the FDM system often hides reports sent back for more information in a separate tab which newer reviewers may not see. Because of the high loss of people this year due to DRP, many people filed reports, but they left the agency and were deleted from the system before their report was certified.
There are 3 Annual reports reflected in the above numbers: #1 required additional information, requested at 58 days. #2 required additional information, requested at 55 days. #3 required additional information, requested at 59 days. There are 4 New Entrant reports reflected in the above numbers: #4 was initially reviewed 3 days after submission, before the government furlough, and certified 1 day after. #5 was submitted 28 days before the furlough, and reviewed/certified 7 days after. #6 was submitted 26 days before the furlough, and reviewed/certified 1 day after. #7 was submitted 21 days before the furlough, and reviewed/certified 1 day after.
At current staffing levels, after a 20% budget cut in FY2024, and an additional two Ethics Advisors departing under the DRP, 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 one Ethics 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 98.6% of 450 reports submitted in 2025 were certified, and 86.2% of those were reviewed within 60 days.
The discrepancies are due to additional information being sought in some cases and reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.
Government shutdown lack of ethics counselor manpower due to DRP, retirements, and resignations lack of timely supervisory reviews turnover of personnel extended TDYs and absences of personnel.
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. DRP and hiring freeze affected personnel and government shutdown also contributed to these shortfalls.
Due to a turnover of ethics officials who took DRP or left Federal service in an expedited fashion, a report was not always immediately reviewed by an ethics official following submission. Also, some ethics officials did not realize they should end initial review on the report when they sent the first round of questions to filers. Some ethics officials waited to check that the end of the initial review was complete after the filer had responded to numerous requests for information and active communication occurred. We are working to educate ethics officials to correctly indicate the end of their initial review in FDM.
Significant turnover of personnel, extended government closure due to lapse of appropriations, delays in supervisor reviews, system/technical issues, and staffing shortages.
Reports reviewed more than 60 days after submission due to competing priorities of reviewers, including the review and certification of Nominee reports, Ethics Agreements, and other PAS ethics documents. Additionally, ethics staff experienced a significantly increased workload and decreased staffing due to the Deferred Resignation Program, which impacted timeliness of certification.
In many components, all ethics officials were placed on administrative leave, and the components did not select alternate employees to fill ethics roles until more than 60 days after reports were filed. Those alternate employees did not have experience and took time learning how to review financial disclosure reports. Other reasons include seeking additional information filers, seeking remedial action, competing workload priorities, and the 43-day furlough.
Some supervisory reviews were delayed, which delayed initial reviews.
New 450 reviewers unfamiliar with FDonline, and the government shutdown.
Staff turnover caused delays in review of reports.
Staffing shortages increase review and certification time for all reports. There were also some reports that required additional corrections and updates.
lack of Department Ethics Office reviewers to handle the report volume within 60 days of report submission
Certain reports were reviewed more than 60 days after submission due to decrease in DEO staffing and inadvertent oversights in tracking the 60-day review time frame for submitted reports.
Initial review was delayed in some cases due to furloughs and personnel losses.
At DO, a large number of filers and their supervisors took the Deferred Resignation Program (DRP), which caused gaps in the reviewing process.
This was the first year VA has included supervisors in the review process, causing some additional delay as the system was learned and identifying supervisors. Additionally, review chains were complicated by the number of supervisors and employees leaving the agency or changing positions in 2025. Finally, ethics staff had to redistribute workload due to Certifiers leaving the Agency. Reviews were also delayed due to the government shutdown.

<p>Under EPA's decentralized ethics program, more than 120 DEOs oversee the confidential financial disclosure system. They reviewed 98% of e450s within 60 days and certified 90% within 60 days. EPA's ethics officials have benefitted greatly by improvements to the tracking dashboards so that they can now precisely track the 60-day review clock. The statistics reflected in this annual questionnaire demonstrate remarkable results in a particularly challenging year.</p>
<p>had issues contacting individuals that had opted to participate in the Deferred Resignation Program.</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>A majority of reports were reviewed more than 60 days after submission due to all ethics office staff being placed on administrative leave from March 5, 2025 to April 4, 2025 due to factors outside of the agency's control. All staff except for three individuals were placed on administrative leave. Ethics office staff reviewed the reports within 60 days of being restored to duty except for four reports. The four reports were submitted to the ADAEO by hard copy prior to the administrative leave period, however those reports were discarded by non-IAF personnel prior to review when the agency staff were put on administrative leave. The employees from those reports separated from IAF in CY2025 and all received post-employment briefings.</p>
<p>Most instances of the small numbers were due to obtaining further information from filers.</p>
<p>During the transition to an electronic filing system, several forms were filed using the PDF and due to administrative oversight were not timely reviewed. The electronic filing system has allowed for better tracking of forms and timely review.</p>
<p>NSF went through 3 rounds of DRP in 2025 and ethics resources were diverted to provided exit briefings and post-employment advice. Terminations were also rescinded and OGC resources had to be diverted due to unprecedented litigation and the review and cancellation of thousands of grants. NSF also experienced a 6-week stoppage in ethics work due to the shut-down. NSF was also forced to rapidly vacate its premises in December.</p>
<p>The Agency continues to surge resources to complete timely financial disclosure reviews. Where reports were reviewed outside the 60-day time-frame, it was due to competing mission priorities. In addition, some forms were held for review by the supervisor for much of the 60-day review period. Efforts are being made to address this going forward.</p>
<p>Some reports were reviewed more than 60 days after submission due to delays in filer responses and the 2025 government shutdown.</p>
<p>A small number of reports were reviewed after 60 days due to the 42 days lost to the government shutdown.</p>
<p>We had one form that was submitted electronically and was hidden from our view. It took IT a while to get us access to the form.</p>
<p>Note that this response shows more reports certified than required to be filed in 2025. That is because this response includes reports due and submitted in 2024 reports which were certified in 2025 and reports that were submitted and certified in 2025 even though they didn't need to be submitted until 2026. 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. The shutdown, greater than expected arrivals and departures, together with excessive workload during report review season also delayed some reviews beyond 60 days.</p>
<p>Organizational and staffing changes. Government lapse in appropriations. Migration of confidential reports to FDM electronic filing system.</p>
<p>In addition to remedial actions being taken and additional information was being sought, the government shutdown impacted the 450 submission date and as a result impacted the review and</p>

certificate date as some of the reviewers and filers were furloughed and unable to work during the government shutdown.
Of the 23 reports (0.57%) that were reviewed more than 60 days after submission, 20 reviews were less than 10 days late. 5 late reviews were caused by turnover in the final reviewers due to personnel attrition in 2025 that occurred during the final reviewer time frame. 3 late reviews were caused by intermediate reviewers not completing their reviews until 56 days or later, causing the final reviewers to certify late. 3 late reviews were due to the 60-day review deadlines occurring during the Federal Government shutdown in 2025. 1 late review was caused by a technical issue with our Confidential Financial Disclosure System (CFDS), which did not register the reviewer's previous timely review for the report, resulting in a late review after the technical issue was corrected.
government shutdown and DRP
Reviewed more than 60 days after submission due to agency reorganization and transfer of personnel between components.
Additional information was being sought
Some could not be reviewed within our system due to technical access issues, and were coordinated as paper. 3 reports were paper copies, which required additional effort to coordinate. Personnel losses and staffing changes affected man-power during the review period. A number of reports received initial review and some reports required modifications and additional coordination with supervisors. Some reports were held for additional time for additional information being sought, for remedial actions pending. The electronic system for 450 management, FDM, also does not have a feature for adding an End Initial Review date directly, with the exception of certifying, requesting an amendment, or requesting additional information in the system. As a result, the table above does not fully reflect initial review processing towards certification.
Staffing shortages and personnel departures
High volume of new and complex filings which required additional guidance, review, and follow-up.

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.

Agency staff transition occurred during the reporting period and the new DAEO was not formally designated until after the initial 60 day period.
Latency in Financial Disclosure Management System (FDM) failed to record initial certification.
Some reports were certified more than 60 days after submission due to other Agency matters (such as the Deferred Resignation Program, placement of 80% of staff on administrative leave, and federal litigation) requiring immediate attention.
Late filing resulted in report being missed and certified late.
For some of the reports we needed additional information from the filer and/or remedial action was taken.
There were more OGE 450 reports in CY25 than in the prior year with fewer personnel to manage them. The Administrative Law & Ethics Team lost 60% of its personnel, to include the Ethics Program Manager (PM), the Associate General Counsel for Administrative Law & Ethics, and a GS-12 attorney. At DoW, part of the review chain requires that the filer's supervisor review and sign the report

<p>confirming that there is no conflict of interest between reported financial interests and reporting individual's current and anticipated official duties. Supervisory review must be conducted within 14 calendar days of filer submission. It is a significant challenge tracking and ensuring supervisor compliance with that requirement to ensure timely review/certification. The prior PM, who took DRP, was the primary for tracking and following up with filers and supervisors to get reports filed and signed.</p>
<p>13 reports were not certified timely and 19 reports are pending certification. Of those reports not certified timely, some were awaiting more information. Additionally, the FDM system often hides reports sent back for more information in a separate tab which newer reviewers may not see. Because of the high loss of people this year due to DRP, many people filed reports, but they left the agency and were deleted from the system before their report was certified.</p>
<p>Other: The DTRA Office of General Counsel lost its Ethics Attorney in March 2025 and could not hire a replacement until September 2025, just before the furlough. The government furlough also impacted the review and certification of new entrant reports during October and November 2025.</p>
<p>Reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.</p>
<p>Government shutdown lack of ethics counselor manpower due to DRP, retirements, and resignations lack of timely supervisory reviews turnover of personnel extended TDYs and absences of personnel.</p>
<p>Significant turnover of personnel, extended government closure due to lapse of appropriations, delays in supervisor reviews, system/technical issues, and staffing shortages.</p>
<p>Reports certified more than 60 days after submission because ethics staff were working on other priority items, including the review and certification of Nominee reports, Ethics Agreements, and other PAS ethics documents. Additionally, ethics staff experienced a significantly increased workload and decreased staffing due to the Deferred Resignation Program, which impacted timeliness of certification.</p>
<p>In all components, significant numbers of employees were subject to personnel actions, and ethics officials had many competing workload priorities after functions were redistributed. In many components, all ethics officials were placed on administrative leave, and the components did not select alternate employees to fill ethics roles until more than 60 days after reports were filed. Those alternate employees did not have experience and took time learning how to review financial disclosure reports. Lastly, some certifications were delayed due to the 43-day furlough.</p>
<p>New 450 reviewers unfamiliar with FDonline, and the government shutdown.</p>
<p>Staff turnover caused delays in certification of reports.</p>
<p>lack of Department Ethics Office reviewers to handle the report volume within 60 days of report submission</p>
<p>Certain reports were certified or closed more than 60 days after submission due to a decrease in DEO staffing.</p>
<p>At DO, a large number of filers and their supervisors took the Deferred Resignation Program (DRP), which caused gaps in the reviewing process. At the Bureau of Fiscal Services, 20 reports were closed outside of the 60 days because the filer departed under the DRP or due to retirement. At OCC, volume of reports and increased workload due to voluntary departures, as well as reduced resources.</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 uses the ethics dashboard to drill down on individual DEO compliance and sends out status updates to those DEOs who are not meeting compliance deadlines.</p>
<p>See above.</p>

Per FHFA-OIG "One report was overlooked during final certifications. We caught the oversight when doing internal control testing and corrected it."
A majority of reports were certified more than 60 days after submission due to the reasons above.
Review of a very small number of forms may have been delayed due to a systems error.
NSF went through 3 rounds of DRP in 2025 and ethics resources were diverted to provided exit briefings and post-employment advice. Terminations were also rescinded and OGC resources had to be diverted due to unprecedented litigation and the review and cancellation of thousands of grants. NSF also experienced a 6-week stoppage in ethics work due to the shut-down. NSF was also forced to rapidly vacate its premises in December.
See explanation above
During the 2025 government shutdown, ethics work was not designated as essential, and reports submitted during that time were reviewed only after the shutdown ended.
We had one form that was submitted electronically and was hidden from our view. It took IT a while to get us access to the form.
In addition to remedial actions being taken and additional information was being sought, the government shutdown impacted the 450 submission date and as a result impacted the review and certificate date as some of the reviewers and filers were furloughed and unable to work during the government shutdown.
Due to staff turnover and lack of access to records, it was unclear whether the 1 report was certified and closed within 60 days, although it was clear that it was initially reviewed and no issues arose. Post-60 days, report was re-reviewed and closed with no identified issues.
See above
Due to government shutdown, some reports were certified more than 60 days after submission.
Due to competing priorities and workload challenges, some reports were reviewed more than 60 days after submission.
One report was certified late due to an oversight. That report had been filed and initially reviewed and cleared for approval prior to the due date, but certification (signature) was inadvertently forgotten at that time and only remedied later in 2025, beyond the 60 days.
Personnel losses also impacted operations.
The Agency's DAEO served as the Acting Agency Head for several months during the reporting period which resulted in additional time necessary to certify and close reports. Most of the USADF were placed on administrative leave in March 2025 and then RIFed in April. When employees were brought back following a district court injunction in July, the DAEO resigned from their position at USADF. The ADAEO certified the six outstanding 450 reports in early September.

Table 54: ADDITIONAL COMMENTS PART 9. Indicate the question number to which the comment corresponds.

The one OGE 450 granted extension was due to filer being on extended leave.
Eight paper forms were accepted from employees who filed at other agencies before joining the Board this year.
As of January 29, 2026, all of our 2025 annual reports have been reviewed and certified. We have systems in place to ensure all reports are reviewed and certified within 60 days going forward.
Extension on a 450 was granted but not needed.
Question 44: Of the 790 450s required to be filed in CY25, 781 were certified and closed. There are 6 reports that are still pending certification but are within the 60-day review and certification window. Finally, there are 3 reports that have been amended by the filer and are currently pending an

additional review by their supervisor. Question 44: The numbers in the first two columns are mirrored to reflect the readily available data retrievable in the FDM system.
Due to agency reorganization, the entire OGC Ethics Division was placed on administrative leave pending RIF on March 11, 2025. For the rest of 2025, the new ethics team attempted to triage ethics compliance, but all aspects of the ethics program experienced backlogs and delays.
Q43. The total number of OGE Form 450 reports filed in 2025 was 15,839. Some employees filed even though they were not required to.
Due to staffing shortages across the department and transition in ethics duties to other agency officials, certifications were delayed.
#45. The agency granted a blanket 45 extension to outstanding reports to account for the complications associated with switching to a new filing system for 2025.
#45 -- EPA's developers needed additional time to incorporate the OGE changes to the e450 so EPA Ethics granted all e450 filers a blanket extension pursuant to 5 C.F.R. § 2634.903(d)(1).
Number 44. In 2025, the agency's 450 administrator separated from GSA and this role was reassigned. During this transition, and also due to the large volume of other agency separations, these numbers may have a slight margin of error. // Number 44(c). Additional information was being sought for the 10 reports initially reviewed, but not certified, within 60 days.
2 SGEs and 1 Non-SGE filer were granted extensions
The one form granted an extension was an amendment late in the calendar year.
Question 45: Response excludes SGE's consistent with Questions 43 & 44.
#43, #44, and #45 Data is not included/is classified.
44a. this is protected information. 100 inserted as placeholder as it would not allow zero or blank entry. 44. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. The Agency continues to surge resources to complete timely financial disclosure reviews. Where reports were reviewed outside the 60-day time-frame, it was due to competing mission priorities. In addition, some forms were held for review by the supervisor for much of the 60-day review period. Efforts are being made to address this going forward.
Due to staffing changes and overwhelming activity during the administration transition, the ethics team was unable to certify the OGE 450 forms.
45. The new DAEO conducted a review of the agency's Form 450 filing processes. Following review of the agency's public and confidential financial disclosure requirements, the DAEO identified a filer who had not yet filed and had not been informed of this year's filing obligation.
Due to the cessation of Agency operations in January 2025, departure of staff throughout 2025, and current lack of access to the e-filing system FDOonline that was used until October 2025, responsive data is unavailable. Zero was entered as necessary for submission, but does not reflect data.

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

Table 55: Q. 49 Did your agency notify OGE of all referral(s) and disposition(s) of the referral(s) via OGE Form 202 pursuant to 5 C.F.R. § 2638.206(a)?

OGE notified via email but no Form 202 was completed.
First case: The underlying misconduct was a short-lived, minor violation that did not appear to warrant a DOJ referral, and the Air Force Office of Special Investigations declined to investigate. Second case: Discipline process is on-going.
OGE-Form 202 was filed in three of the four cases, and the only case that did not have a 202 was due to an oversight. 202 will now be filed promptly after oversight discovered in that one case.
Agent error for which NASA OIG is providing training.
With respect to the one above-referenced referral to DOJ: - in December 2025, agency ethics officials received notice both of a DOJ referral and the DOJ's decision - to decline prosecution - in January 2026, agency ethics officials transmitted to OGE Form 202 (Parts 1 and 2) and - the agency expects in the near term to take next steps toward disciplinary/corrective action.

Table 56: ADDITIONAL COMMENTS FOR PART 10. Indicate the question number to which the comment corresponds.

Q 48 a. iii. The case has been accepted by the DOJ for further investigation and is still pending. Q. 48 part C - the employee resigned before the Board could take disciplinary action.
Question 46: One disciplinary action was based on a violation of Subparts E and G of 5 CFR 2635 and is noted in both fields.
As per USDA OIG, there was one additional case worked involving USDA personnel, but the FBI was the lead agency. The USDA Office of Ethics does not have any additional information on that case.
As stated above. We may be making referrals if supervisors are not able to contact DRP termination report personnel. We will notify OGE if such referrals are necessary.
We had one case that was reported previously (2023) that closed resulting in disciplinary action (disbarment). The subject was someone who left their agency prior to the agency determined action. The update for this case (202 Part 2) was filed 1/23/2026 to OGE referrals as it was completed 12/31/2025 and report finalized on. 1/7/2026. OGE Referral Number 2023-0530.
#48 Our criminal investigation component, Defense Criminal Investigative Service (DCIS), investigates personnel both within and outside the Office of Inspector General(OIG). None of the referrals to DOJ involved OIG personnel.
Q 46 - DoD has a number of personnel employed in retail clerk type positions and the vast majority of violations listed pertain to those positions. Q 47. An employee resigned after the agency proposed removal for alleged violation of 18 U.S.C. 208. After agency investigation, a U.S. Attorney declined to pursue charges thus, it was not referred to the Department of Justice.
Q48: All referrals to DOJ were for employees at the IRS.
Due to the cessation of Agency operations in January 2025 and departure of staff throughout 2025 responsive data is unavailable.

PART 11. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

Table 57: Q.51 Initial Ethics Training

<p>We were not informed of the appointments of SGEs on one committee in a timely fashion. We are working to get them trained and have their reports filed.</p>
<p>The Scientific Advisory Board is still pending its first meeting.</p>
<p>All the SGEs attached to FACA boards were dismissed at the beginning of the year before they had their first meeting. Some received IET before they were dismissed. For those who had not yet received IET, because they are no longer at the DON, they cannot receive IET.0</p>
<p>Some SGEs served on a Board that apparently did not perform any work in 2025. Other SGEs were not identified by the new ethics team as receiving ethics support from the Department until the end of 2025 or early 2026. A solution for ensuring compliance for boards and committees was implemented in August 2025 but was disrupted due to staff departures at the end of September and further disrupted by the furlough until mid-November.</p>
<p>4 SGEs did not receive IET before or at the beginning of the first meeting but since separated from the committee, so are not longer required to receive it.</p>
<p>Most committees did not meet in 2025, so did not require SGEs to complete training. SGEs who did not complete training did not participate in any government matters.</p>
<p>Lack of Department Ethics Office staff to pursue IET completion and tracking</p>
<p>Four SGEs received IET after their first meeting due to gaps in coordination, scheduling, and tracking oversights.</p>
<p>At US Mint, there was difficulty in coordinating SGE schedules (all unpaid volunteers) for administrative meeting / ethics training prior to first substantive meeting. However, all SGEs are incumbents from previous years and had received IET in prior years.</p>
<p>The SGE at EXIM in 2025 did not serve on a board, commission, or committee. This section does not apply to him. Nevertheless, he received IET on day 8 of his term.</p>
<p>Our three SGEs serving on federal advisory committees were in their second year of service in CY 2025. They received initial ethics training in CY 2024 prior to their first meeting. In CY 2025, the ethics team delivered initial ethics training again, but it was necessarily after the first meeting, which occurred the prior year.</p>
<p>One SGE who was appointed early in 2025 but never participated in a meeting did not receive IET.</p>
<p>Given the Commission meeting cycle, the SGEs serving at the beginning of the year were not able to complete the ethics training prior to the first meeting (but had completed ethics training for the 2024 preceding year, as the SGEs remained the same). Three new SGEs came to NCPC in July, all of whom are already federal employees and comply with annual government ethics through their full-time positions. They were all given NCPC-specific training shortly after joining. The three departing SGEs did not complete the 2025 training prior to their termination with the agency mid-year.</p>

Table 58: Q.52 Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2025, and the number of reports actually filed by December 31, 2025.

6 SGEs were either terminated or resigned from their positions before the end of Feb. 2025. The remaining 4 SGEs were terminated in Sept. 2025. During the period in-between, the agency went through a massive RIF and reorg.
See Additional Comments for Part 11 and Additional Questionnaire Comments, for explanation.
We were not informed of the appointments of SGEs on one committee in a timely fashion. We are working to get them trained and have their reports filed. Others were notified of the filing requirements and despite being notified did not submit their reports as required.
A solution for ensuring compliance for boards and committees was implemented in August 2025 but was disrupted due to staff departures at the end of September and further disrupted by the furlough until mid-November.
2 SGEs did not submit a financial disclosure before the beginning of the first FACA meeting but since separated from the committee.
Most committees did not meet in 2025. SGEs who did not complete financial disclosures did not participate in any government matters.
One expert requested multiple extensions and then left the agency before filing. We are still working with the other three experts on technical issues.
DEO -One confidential filer left DOJ before filing a OGE Form 450. OJP - All OJJP activities were on hold in 2025. There were no meetings nor were there communications with filers to file the OGE Form 450. EOUSA - Due to government shutdown, Form 278s were not assigned until December 2025 and with extensions are not due until February 2026.
A. PD 2, CPAC 12, ISAB 1 C. Special Envoys & Other SGEs (do not include UNGA) D. Fulbrights
Please note that three SGEs who served on the Advisory Committee on Reconciliation in Place Names did not file their OGE Form 450 reports prior to the committee's termination on February 27, 2025. Additionally one SGE who served on a Commission terminated service in CY 2024 but inadvertently filed an OGE Form 450 report in CY 2025.
At US Mint, one SGE, despite repeated requests from bureau ethics official, failed to submit a confidential report during the calendar year. Member's service will not be renewed in CY2026. One filer made a timely request for an extension, which was granted, and the report was submitted late and timely certified in CY26.
Response for one particular organization with SGEs: Due to the DRP, transition, and loss of ethics officials, 3 SGEs were not asked to submit their reports until January 2026 (and have now done so). In another organization with SGEs: One person started as a Schedule C but did not serve in that position for more than 60 days and then was converted to an SGE. The individual was excused from filing a public financial disclosure report pursuant to 5 C.F.R. § 2634.204. As an SGE, the individual was assigned the EPA Form 3110-48 but separated from EPA prior to filing the report.
The one individual who did not file his Confidential Financial Disclosure form was an SGE who did not perform any work for the FLRA during 2025. The FLRA timely provided him with notice of his need to file his financial disclosure form, but due to internal staff transitions (loss of staff and the ADAEO), did not follow up on that request when the filer did not submit the report. The FLRA has subsequently been in contact with the SGE and believes that the failure to file was an oversight. The filer attended the FLRA's annual ethics training in December 2025. The FLRA believes that the filer will complete the form in the near future.
One board member did not submit their 450 prior to separating from the agency.

The discrepancy between the number of reports required to be filed and the number actually filed resulted from an SGE resigning before the annual filing deadline.
Organizational and staffing changes. Government lapse in appropriations.
Filer/SGE was nonresponsive to requests to file report.
The four reports that were not filed belong to two PAS SGE Board Members whom the President terminated effective January 23, 2025. These filers are contesting their terminations in federal court. At the conclusion of the litigation, the agency will determine the type of required reports that are due.
OEC did not receive notice from the SGE's Administrative Officer (AO) that two filers were re-appointed. One filer was re-appointed for an additional year in October 2025 (10/23/2025 - 10/22/2026). OEC has identified the discrepancy and the SGE will be submitting a late filing of the annual form covering 2025. The second filer was re-appointed October 2025 (October 12, 2025) for an additional year. OEC has identified the discrepancy, however this filer has since separated from the agency effective 1/15/2026. OEC has discussed this issue with OHR and has requested that OHR implement additional procedures to ensure that this issue does not reoccur.
Filers separated from federal service before filing report.

Table 59: Q.53 Report 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.

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's Office of Ethics does not possess.
The discrepancies are due to additional information being sought in some cases and reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.
DRP, retirements, resignations, and hiring freeze created a deficit in our workforce filers ignoring communications regarding his/her report employee leave and government shutdown.
Failure of notification to ethics official.
Reports reviewed more than 60 days after submission due to competing priorities of reviewers, including the review and certification of Nominee reports, Ethics Agreements, and other PAS ethics documents. Additionally, ethics staff experienced a significantly increased workload and decreased staffing due to the Deferred Resignation Program, which impacted timeliness of certification.
One committee management office was terminated, and reviews were delayed while functions were transferred to another office. One component's meetings were put on hold and ethics officials were instructed not to perform any further work on committee members financial disclosures. One component's SGEs were deployed in disaster responses and were delayed in responding to questions from ethics officials.

New 450 reviewer unfamiliar with FDonline and government shutdown.
Substantial delays in receiving notice of new SGE staff and Lack of staff to track SGEs and perform reviews more timely
This was the first year VA has included supervisors in the review process, causing some additional delay as the system was learned and identifying supervisors. Additionally, review chains were complicated by the number of supervisors and employees leaving the agency or changing positions in 2025. Finally, ethics staff had to redistribute workload due to Certifiers leaving the Agency. Reviews were also delayed due to the government shutdown.
One SGE report above was initially reviewed more than 60 days after submission due to the shutdown.

Table 60: Q.59 Report 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.

Ethics officials sent back one report for revisions. The filer made the revisions, sent back the report, and ethics officials certified the report within 5 days of the filer resubmitting the revised report.
One report was reviewed within 60 days but filed over 60 days, with an extension.
One SGE report was not certified within the 60-day timeframe due to administrative oversight following a lack of personnel during a 43-day lapse in appropriations. The report was submitted to our office during the 43-day government shutdown and has since been certified with no concerns.
The discrepancies are due to additional information being sought in some cases and reductions in personnel and increased workload due to DRP and VERA departures throughout the calendar year.
DRP, retirements, resignations, and hiring freeze created a deficit in our workforce filers ignoring communications regarding his/her report employee leave and government shutdown.
Reports certified more than 60 days after submission because ethics staff were working on other priority items, including the review and certification of Nominee reports, Ethics Agreements, and other PAS ethics documents. Additionally, ethics staff experienced a significantly increased workload and decreased staffing due to the Deferred Resignation Program, which impacted timeliness of certification.
One committee management office was terminated, and reviews were delayed while functions were transferred to another office. One component’s meetings were put on hold and ethics officials were instructed not to perform any further work on committee members financial disclosures. One component’s SGEs were deployed in disaster responses and were delayed in responding to questions from ethics officials.
New 450 reviewer unfamiliar with FDonline and government shutdown.
Additional information was being sought internally from human resources and from filer We are still seeking clarity on the employment status of a number of SGE filers to determine which reports they are required to file. The Department Ethics Office continues to follow-up about missing reports and will refer filers as appropriate as soon as possible.
At IRS, 6 OGE 450s were not certified within the 60-day limit due to an inadvertent oversight with the e-mails.
One report was certified more than 60 days due to the shutdown.

4 Filers needed to respond to questions and provide additional information.
Filers took time responding back to OGC with additional requested information and some reports took additional time because filer requested that OGC speak with additional parties (ex financial advisor, spouse, company's legal team, etc.) regarding their report and OGC's review and requested remedial actions.
The Agency's DAEO served as the Acting Agency Head for several months during the reporting period which resulted in additional time necessary to certify and close reports.

Table 61: ADDITIONAL COMMENTS FOR PART 11. Indicate the question number to which the comment corresponds

Q52-55: 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.
Q51: The agency had 12 non-FACA SGEs. These SGEs were reappointed annually at various start/end dates which did not correspond with a calendar year (Jan.-Dec.). During the 2025 calendar year, there were: 4 SGEs who were reappointed in the beginning of 2025 and served for several months as part of their annual appointments for 2025/2026. These SGEs were terminated in the second half of 2025. Of the four, one SGE timely completed the initial ethics training, and two did not respond to requests to take the training. The fourth SGE took initial ethics training 2024 as part of her 2024/2025 appointment. This SGE was reappointed for a 2025/2026 term in the beginning of 2025, but HR did not notify CFTC Ethics of this reappointment and therefore no initial ethics training was scheduled. 7 SGEs also served for several months during 2025 as part of their 2024/2025 annual appointments, but who were not reappointed at the end of their 2024/2025 terms.
we have no special government employees in the DoD OIG.
The significant drop in numbers of Advisory Committee Members (FACA) from CY 2024 was a result on an internal review during which no FACA members were appointed/renewed.
Due to agency reorganization, the entire OGC Ethics Division was placed on administrative leave pending RIF on March 11, 2025. For the rest of 2025, the new ethics team attempted to triage ethics compliance, but all aspects of the ethics program experienced backlogs and delays. Priority was given to getting boards into compliance prior to meetings at the end of 2025. It is possible additional board and committee members completed their required training in 2025 before the March 11, 2025, agency reorganization. We do not have access to records or staff that could verify such activities. It is likely additional 450s were submitted by board and committee members and were certified by the former ethics team. We have not had time to inventory all records previously kept in paper and PDF instead of the FDOonline system. We also have not had access to the email and personal electronic storage used by the former ethics team.
Q 50 This number includes SGEs that started 2025 on FACA committees but that separated later in 2025 before their committee met (and therefore were not required to take initial ethics training or submit an OGE Form 450.)
Q54: 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.
Additional comments for Question #52: While the DEO had 115 SGEs in CY 2025, only 111 were required to file an OGE Form 450 report. Three SGEs who served in CY 2025 were appointed in December 2024 and filed their OGE Form 450 reports in December 2024. Accordingly, they were not required to file annual OGE Form 450 reports in CY 2025. One SGE served in an OGE Form 278e

position prior to converting to an SGE and was not required to file an OGE Form 450 pursuant to 5 CFR 2634.904.
Historically, EPA maintains a large number of SGEs "on the books," but does not call upon them to serve unless there is a FACA meeting. In CY 2025, however, EPA faced massive changes in personnel and organizational structure, and did not convene many FACA committees. The information provided here reflects the fact that only a small number of SGEs actively performed duties for EPA in CY 2025.
54. SGE excluded from filing requirements because his duties and responsibilities did not qualify him to file an OGE 450.
Question 50 - 10 of the 15 SGEs were dismissed on February 10, 2025, and thus were not required to file Confidential Financial Disclosure forms in 2025.
Q. 50- one of two FACA committees housed within IMLS was terminated before filing season began, but after the calendar year had started. This led to a decrease of 25 required filers.
NASA advisory committee members file new entrant OGE 450s on a September 30 cycle, with those not trained earlier in the year trained by Dec 31. Q. 50: Eighteen committee SGEs previously cleared for service in 2025 participated in a 2025 committee meeting. Q. 51: Three SGEs not included in line 51(a) received training in Dec 2024, but their appointments expired on October 1, 2025 when the U.S. Government shutdown began and were not reappointed in 2025, so were not required to be trained by the end of 2025. Q. 52: The three SGE's mentioned in Q. 51 whose appointments expired on October 1, 2025 had not filed by that time and due to expiration were not required to file by the end of the year, so are not included in the chart. Q. 53: Six SGE 450s filed in 2025, five of whom filed in the month before shutdown, were certified in January 2026.
53/54 - The three new SGEs appointed to NCPC as Commissioners in July 2025 all have full-time federal positions with other offices/agencies, and in those roles, those three individuals are required public filers. Thus, the SGEs already file publicly and NCPC separately reviews their financial disclosures to confirm no conflict.
The NEA employs a large number of SGEs on FACA committees to fulfil its grantmaking functions. This year, there were 381 SGE's serving on the Arts Advisory Committee (AAC), the Federal Advisory Committee for International Exhibitions (FACIE), the Arts and Artifacts Indemnity Panel (AAIP), and the National Council on the Arts (NCA).
Advisory board that the 6 SGE's served on was dis-established in 2025.
50. This is protected information. 51a. This is protected information. 51a(i). 100%. The numbers reported are percentages. Actual numbers are made available to cleared OGE personnel when required. 52a. n/a for all 52b. Confidential Reports REQUIRED: This is protected information. 52b. Confidential Reports FILED: 100%. The numbers reported are percentages. Actual numbers are made available to cleared OGE personnel when required. 52b. Public Reports n/a 52c. n/a for all 52d. n/a for all 52e. n/a for all 52f. n/a for all 53a. CONFIDENTIAL REPORTS: 100%, PUBLIC REPORTS: n/a 53b. CONFIDENTIAL REPORTS: 100%, PUBLIC REPORTS: n/a 53c. CONFIDENTIAL REPORTS: 100%, PUBLIC REPORTS: n/a 53. The numbers reported above are percentages. Actual numbers are made available to cleared OGE personnel when required. 54. n/a 55a. Granted filing extension 0, Granted waive of late filing fee 0, paid late filing fee 0 55b. 0
#51: SGEs were expected to serve for more than 60 days and all received Initial Ethics Training before or at the beginning of starting their official duties.
The eight (8) members of the USUHS Board of Regents were serving under active OGE 450s filed in mid 2024 pursuant to their 2024 appointment when their service was terminated early by the Secretary of Defense as part of a Department wide review of Federal advisory committees effective April 2025. Historically, the SGEs file an OGE 450 within 30 days of their re-appointment dates. Since

the members were discharged before their 2025 re-appointment there was no additional 450 filing requirement in 2025.
Due to the cessation of Agency operations in January 2025 and departure of staff throughout 2025 responsive data is unavailable. Zero was entered as necessary for submission, but does not reflect data.
One extension was granted. No late filing fees were assessed.
Q50. Six SGEs were previously in public filing positions and had completed public financial disclosure reports. Q54. Eight SGEs served in administrative positions that did not meet the requirements to file a confidential report under 5 C.F.R. Sec. 2634.904.

Table 62: ADDITIONAL QUESTIONNAIRE COMMENTS:

Regarding the contact information at the end of this form, ACUS does not have a CHCO. The agency is a micro agency that contracts with GSA for HR services. There was no option for "Not Applicable."
Some information withheld due to classification.
Q51 continued: 6 of these SGEs all took the initial ethics training in 2024, at the start of their 2024/2025 appointments. 1 SGE did not take the initial ethics training despite requests. The agency had six non-FACA SGEs, all of whom were appointed in previous calendar years and therefore were not required to receive initial ethics training. Q52 (a) & (b): The agency had four SGEs on FACA advisory committees and two SGEs serving on non-FACA advisory committees. An OGE 450 was not required for these individuals. See, 5 CFR 2634.903(b)(2)(iii). Q52(c): One consultant failed to respond to Ethics Office's requests to file a report, but was among a group of SGEs terminated by the agency in the second half of 2025. A second consultant SGE was not included in the request to file an OGE 450 because the Ethics Office did not receive notice of the appointment.
The Agency does not have any SGEs.
CIGIE has no current DAEO. CIGIE has no current General Counsel or other counsel. Virginia Grebasch is currently listed as POC but falls under PRAC and can facilitate communication between CIGIE and OGE.
The Ethics Program faced many challenges in 2025 including the retirements of our Ethics Program Manager and DAEO, and the ethics administrator resigned under the government's deferred resignation program. With the hiring freeze for most of the year the agency did not authorize new hires other than for critical vacancies. The furlough at the end of the reporting period caused challenges with completing annual ethics training which our agency requires all individuals to complete.
Every aspect of the Department's ethics and financial disclosure program in CY2025 was burdened by the substantial reduction in L/efd staff caused by decisions to take the Deferred Resignation Program and an unusually high number of retirements, which were all in addition to a large influx and outflux of financial disclosure filers due to the change in Administration.
In CY 2025, the IAF was met with many challenges including loss of staff and the almost closure of the agency. The agency lost work time in March, October and part of November due to circumstances out of our control with staff placed on administrative leave or furlough. These administrative leave and furlough periods coincided with the review period for both confidential and public filings. The other months Ethics Office bandwidth was limited due to losing a staff member in our office and assisting the agency in responding to many administration compliance measures. Therefore review and certification times were delayed in CY 2025 where in past years most reports were reviewed and certified within the required timeframe.