



# Ethics Program Review

Department of the Interior  
Office of the Secretary  
Office of the Solicitor

Report No. 24-36  
April 2024



The United States Office of Government Ethics (OGE) conducted a review of the Department of the Interior’s (DOI) ethics program in early 2024. The following summarizes the results of that review.

## Contents

Objectives, Scope and Methodology.....	1
Agency Background.....	3
Program Administration.....	3
Financial Disclosure.....	4
Education and Training.....	7
Advice and Counseling.....	11
Agency-Specific Ethics Rules.....	11
Conflict Remedies.....	12
Enforcement.....	12
Special Government Employees.....	12
Agency Comments.....	13

## Objectives, Scope and Methodology

**Objectives:** OGE provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. The Ethics in Government Act gives OGE the authority to evaluate the effectiveness of executive agency ethics programs.<sup>1</sup> OGE uses this evaluation authority largely to conduct reviews of agency ethics programs. The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program.

**Scope:** OGE examined the DOI Departmental Ethics Office’s (DEO) administration of the ethics program within the Office of the Secretary (OS) and the Office of the Solicitor (SOL) or OS/SOL, collectively. This administration includes managing the public and confidential financial disclosure systems, providing ethics training and counseling, ensuring required notices are sent to prospective employees and new supervisors, resolving conflicts of interest, and enforcing ethics-related restrictions.

**Methodology:** OGE conducted the review of DOI’s ethics program in early 2024. As part of its review, OGE examined a variety of documents provided by DOI’s ethics officials, including DOI’s response to OGE’s 2023 Annual Agency Ethics Program Questionnaire, written procedures for administering the program, samples of public and confidential financial disclosure reports filed in 2023, ethics training materials, and a sample of the ethics advice and counseling provided to employees. In addition, OGE met with agency ethics officials to clarify the information gathered, follow up on issues identified during the review, and discuss ethics program operations in further detail.

<sup>1</sup> See title IV of the Ethics in Government Act, 5 U.S.C. app. § 402 and 5 C.F.R. part 2638.

## Agency Background

Established in 1849, the DOI mission includes protecting and managing the nation's natural resources and meeting responsibilities to Native Americans and certain island communities. Activities under its mission include managing and providing access to public lands, historic preservation, endangered species conservation, and upholding federal trust responsibilities to federally recognized Indian tribes and Alaska Natives. DOI is headed by a Presidentially appointed, Senate-confirmed (PAS) Secretary who leads a workforce of 70,000 employees and almost 280,000 volunteers located at bureaus and offices throughout the United States.

## Program Administration

DOI's Designated Agency Ethics Official (DAEO) also serves as the Director of the DEO, which is located within the Office of the Solicitor. The DAEO is assisted by a Deputy Director of Ethics Law & Policy (DDELP), as well as a Deputy Director of Operations (DDOP). The DDELP also serves as the Alternate DAEO (ADAEO) and is responsible for the Policy & Compliance Branch, Financial Disclosure Branch, and Advice and Counseling Branch of the DEO. The DDOP is responsible for the DEO's National Office & Bureau Program Branch; the Training, Education, and Communication Branch; and the Program Support Unit.

Subordinate to the Deputy Directors are two types of ethics officials: ethics specialists and attorney advisors. These ethics officials provide ethics services to OS/SOL employees. These services include providing advice and counseling, conducting training, reviewing, and certifying financial disclosure reports, maintaining ethics-related records, and assisting in enforcement of ethics laws and regulations.

### Ethics Program Consolidation

Historically, the DEO provided direct ethics services to OS/SOL employees and all of DOI's political appointees, including PAS officials. The DEO also managed the ethics program department-wide through Bureau and Office officials who were appointed Deputy Ethics Counselors (DEC). This DEC appointment was a collateral duty to the officials' primary duties and responsibilities. DEC's received direction from the DAEO, but as employees of the Bureaus and Offices they served, the DAEO was not part of their supervisory chain.

On August 14, 2019, the Secretary of the Interior issued Secretarial Order 3375, *Improving the Department of the Interior's Ethics Programs Through Consolidation*, which consolidated 12 Bureau/Office ethics programs into the DEO under the supervision of the DAEO. In the consolidated DEO, the DAEO, DDELP, and DDOP oversee the work of Bureau/Office DEC's to ensure that ethics-related requirements are met by ethics officials assigned to Bureau/Office ethics teams. As a result of the consolidation, DOI increased the number of full-time ethics officials in the DOI Ethics Program from 21 in April 2018 to 89 in

February 2024.<sup>2</sup> Moreover, as of February 2024, the DEO had 18 ethics officials dedicated solely to administering the ethics program for OS/SOL.

### Senior Leadership Support

According to DEO officials, DOI's senior leadership takes an active role in supporting the ethics program and engaging DOI employees in ethics-related issues. This support includes the Secretary of Interior instituting annual practice to send a message to all DOI employees highlighting the importance of complying with ethics requirements and of consulting with ethics officials. In 2023, the Secretary's message focused on "Upholding Our Commitment to Strong Ethics" and encouraged all employees to do the right thing in the right way. Similar messages were sent in 2022 and 2021. The Secretary, former Deputy Secretary, and Solicitor also presented remarks at the DEO's 2023, 2022, and 2021 Annual Ethics Summit, an internal training event for all ethics officials in the DEO as well as invited ethics officials from across the executive branch ethics community. Additionally, the Secretary and DOI Chief of Staff each have regular separate bi-weekly standing meetings with the DAEO and ADAEO providing an opportunity to discuss specific ethics questions as well as broader ethics program issues. Finally, under the Secretary's leadership, DOI includes *Strategic Goal 4: Serve and Honor the Public Trust* in the Department's FY 2022-2026 Strategic Plan which calls for the promotion of ethical and inclusive decision making by Department employees.

### Model Practice

OGE identifies model practices and shares them when it appears they may benefit other executive branch agency ethics programs. OGE considers the following to be a model practice implemented at DOI.

- DOI's senior leadership actively supports the DEO by helping to raise employee awareness of ethics-related responsibilities.

### **Financial Disclosure**

Title I of the Ethics in Government Act requires that agencies administer public and confidential financial disclosure systems. Financial disclosure serves to prevent, identify, and resolve conflicts of interest by providing for a systematic review of the financial interests of officers and employees. The financial disclosure process also offers an opportunity for ethics officials to provide ethics-related counseling to report filers.

To evaluate DOI's financial disclosure systems, OGE evaluated the required written procedures for administering the systems and a sample of public and confidential financial disclosure reports that were required to be filed by DOI employees in OS/SOL.

---

<sup>2</sup> In addition, the National Indian Gaming Commission and the Office of Inspector General employ ethics officials who act independently, but in coordination with the DAEO and the DEO.

## **Financial Disclosure Written Procedures**

Each executive branch agency must establish written procedures for collecting, reviewing, evaluating, and where applicable, making publicly available financial disclosure reports filed by the agency's officers and employees.<sup>3</sup> OGE examined DOI's written procedures and determined they meet applicable requirements.

## **Notices to the DAEO**

Agency human resources offices play a vital role in ensuring the effective administration of the ethics program. Without necessary information about agency employees, ethics officials cannot successfully carry out their important work. Among other things, the lead human resources official is required to notify the DAEO of all appointments to positions that require incumbents to file public or confidential financial disclosure reports no later than 15 days after the appointment. The lead human resources official must also notify the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports no later than 15 days after termination.<sup>4</sup> This helps to ensure the timely collection of financial disclosure reports.

During the review, OGE examined DOI's written procedures for providing the required notices to the DAEO and found that they were in compliance with applicable requirements. Moreover, based on the examination of a sample of notifications sent from HR to OS/SOL, OGE determined that the written procedures were also effective.

OS/SOL officials noted that employees within OS/SOL are serviced by several different human resources points of contact. For example, the SOL's Division of Administration provides a regular "Comings and Goings" report to ethics officials, denoting the financial disclosure filing status of all onboarding and offboarding employees, as well as detailed information on employees acting in, detailed to, or reassigned to a role. Another example is the Assistant Secretary – Indian Affairs human resources team provides ethics officials with a continuous access to a spreadsheet housed on a live environment and updates the document as needed with any hires, terminations, or reassignments. Finally, certain human resources officials within OS include the DEO on bi-weekly distribution list containing spreadsheets listing all DOI accessions, separations, and internal transfers and rely upon ethics officials to review and extract the information to take any appropriate action.

## **Public Financial Disclosure**

Within 30 days of assuming a covered public filing position, an individual must file a public financial disclosure report.<sup>5</sup> The individual must subsequently file an annual report by May 15 each year and a termination report within 30 days of departing the public filing position.<sup>6</sup> The reports are required to be reviewed for potential conflicts of interest and certified

---

<sup>3</sup> See Section 402(d)(1) of the Ethics in Government Act.

<sup>4</sup> See 5 C.F.R. § 2638.105(a)(1) and (2).

<sup>5</sup> See 5 C.F.R. § 2634.201(b).

<sup>6</sup> See 5 C.F.R. § 2634.201(a) and (e).

within 60 days of receipt by the ethics office, unless additional information is being sought from the filer or remedial action is being taken.<sup>7</sup>

## OGE's Examination of Public Financial Disclosure Reports

To evaluate the administration of DOI's public financial disclosure system, OGE examined 22 new entrant, 30 annual, and 16 termination non-PAS public reports that were required to be filed by OS/SOL employees in 2023 up to the date of OGE's review. OGE also examined 14 annual and 2 termination PAS reports. Tables 1 and 1A below present the results of OGE's examination.

**Table 1. OGE's Examination of Non-PAS Public Financial Disclosure Reports**

	New Entrant		Annual		Termination		Total
<b>Reports Examined</b>	22		30		16		68
<b>Filed Timely</b>	18	(82%)	30	(100%)	16	(100%)	64 (94%)
<b>Certified Timely</b>	21	(95%)	30	(100%)	16	(100%)	67 (99%)

**Table 1A. OGE's Examination of PAS Public Financial Disclosure Reports**

	New Entrant		Annual		Termination		Total
<b>Reports Examined</b>	0		14		2		16
<b>Filed Timely</b>	N/A	N/A	14	(100%)	2	(100%)	16 (100%)
<b>Certified Timely</b>	N/A	N/A	14	(100%)	2	(100%)	16 (100%)

As noted in Table 1, 18 of 22 (82%) new entrant reports were filed timely and 21 (95%) were certified timely. Also noted in Table 1, all 30 annual reports were filed and certified timely. All 16 termination reports were also filed and certified timely.

As noted in Table 1A, all 16 PAS reports were filed and certified timely.

Based on their examination, OGE reviewers determined that processes for collecting and certifying public reports in timely manner appeared to be effective. Moreover, OS/SOL reviewers' notes documenting ethics officials' reviews of the reports demonstrated that questions were raised and addressed when assets were identified as potential conflicts.

## OGE's Examination of Confidential Financial Disclosure Reports

To evaluate the administration of DOI's confidential financial disclosure system, OGE reviewed a sample of 45 new entrant and 45 annual reports that were required to be filed by OS/SOL employees in 2023. Table 2 below presents the results of OGE's review.

<sup>7</sup> See 5 C.F.R. § 2634.605.

**Table 2. OGE’s Examination of DOI’s Confidential Financial Disclosure Reports**

	New Entrant	Annual	Total
<b>Reports Examined</b>	45	45	90
<b>Filed Timely</b>	38 (84%)	45 (100%)	83 (92%)
<b>Certified Timely</b>	41 (91%)	45 (100%)	86 (96%)

As indicated in Table 2, annual reports were filed and certified timely. However, 7 (16%) of the 45 new entrant reports OGE examined were filed late, though virtually all were certified timely.

As with the public reports OGE examined, sampled confidential reports contained notes documenting that ethics officials raised questions when assets were identified as potential conflicts.

## Education and Training

An ethics training program is essential to raising awareness among employees about the ethics laws and rules that apply to them and the availability of agency ethics officials to provide ethics counseling. Each agency’s ethics training program is required to include at least an initial ethics orientation for all new employees and annual ethics training for covered employees.<sup>8</sup>

### Ethics Briefing for Certain Agency Leaders

Certain PAS officials must complete an ethics briefing to discuss their immediate ethics obligations no later than 15 days after their appointment, unless the DAEO grants an extension.<sup>9</sup> Any extension of more than 15 days requires the DAEO to make a written determination that extraordinary circumstances make it necessary to provide the briefing at a later date.<sup>10</sup> There were no new PAS employees appointed during the period covered by the review; therefore, OGE could not assess this aspect of the program.

### Initial Ethics Orientation

To meet initial ethics orientation (IEO) requirements, all new agency employees must receive ethics official contact information along with the following material within 90 days of beginning work: (1) the Standards of Conduct for Employees of the Executive Branch (Standards of Conduct) and any agency supplemental standards of conduct to keep or review; or (2) summaries of the Standards of Conduct, any agency supplemental standards of conduct, and the

<sup>8</sup> See 5 C.F.R. §§ 2638.704 and 705 for definition of covered employees.

<sup>9</sup> See 5 C.F.R. Part 2634.201 (c) (2)

<sup>10</sup> See 5 C.F.R. § 2638.305.

Principles of Ethical Conduct (Principles) to keep. Employees must receive one hour of official duty time to review the material.<sup>11</sup>

OGE reviewed the materials DOI used to provide IEO in 2023 and determined that the materials met applicable content requirements. OGE also determined that DOI provided IEO to all new employees within 90 days, as required. IEO was generally conducted in either bi-weekly, virtual sessions or computer-based interactive training during which required ethics materials were provided.

### **Annual Ethics Training**

To meet the annual ethics training requirements, covered employees must receive annual training consisting of a review of: (1) the Principles; (2) the Standards of Conduct; (3) any agency supplemental standards of conduct; (4) the criminal conflict of interest statutes; and (5) ethics official contact information. Training length and delivery method may vary by an employee's financial disclosure filing status.<sup>12</sup>

### **Annual Ethics Training for Public Filers**

Generally, live training must be provided each calendar year to each employee whose pay is set at Level I or Level II of the Executive Schedule. Live training must also be provided to other employees who are required to file public financial disclosure reports pursuant to 5 C.F.R. § 2634.201(a) every other year, with interactive training provided in the intervening years. The training presentation, whether live or interactive, must focus on government ethics laws and regulations that the DAEO deems appropriate and must address financial conflicts of interest, impartiality, misuse of position, and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.

In 2023, DOI provided live or computer-based interactive annual training for DOI public filers. OGE reviewed both versions of the DOI training materials and determined that they met applicable content requirements. OGE reviewed DOI's annual ethics training records and found that DOI had provided annual ethics training to all 184 (100%) covered public filers in OS/SOL. In fact, DOI provided live annual ethics training to 86% of all OS/SOL PAS employees 2023, going above and beyond the minimum annual training requirements.

### **Annual Ethics Training for Confidential Filers**

Generally, interactive training is required to be provided each calendar year to employees who are required to file a confidential financial disclosure report pursuant to 5 C.F.R. § 2634.904; employees appointed by the President and employees of the Executive Office of the

---

<sup>11</sup> See 5 C.F.R. § 2638.703.

<sup>12</sup> See 5 C.F.R. §§ 2638.704 and 705.



President; contracting officers described in 41 U.S.C. § 2101; and other employees designated by the head of the agency. The training presentation must focus on government ethics laws and regulations that the DAEO deems appropriate and must address financial conflicts of interest, impartiality, misuse of position, and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.<sup>13</sup>

In 2023, DOI provided live and computer-based interactive annual training for DOI confidential filers. OGE reviewed both versions of the DOI training materials and determined that the materials met applicable content requirements. OGE's review of DOI training records also found that DOI had provided annual ethics training to over 99% of covered confidential filers in OS/SOL in 2023.

#### Additional Ethics Outreach Efforts

In addition to conducting the requisite initial and annual ethics training for both public and confidential filers, the DEO makes efforts to keep DOI employees aware of ethics-related issues and requirements and offers continuous learning opportunities to ethics officials across the DOI Ethics Program throughout the year. OGE highlights examples below identified during the current review:

- The DEO regularly conducts ethics training tailored for specific audiences throughout DOI. For example, DEO provided tailored training to new SES officials and to DOI researchers and scientists in 2023. Additionally, the DEO provided additional tailored training on identifying and screening for recusals and other identified ethics risk areas to political appointees. The DEO also maintains and regularly updates the DOI Ethics Mobile App, which is loaded on all DOI government-furnished equipment and available to all DOI employees and members of the public who wish to learn more about the ethics rules.
- The DEO invests significant resources in delivering an ethics education and training program for ethics officials across the DOI Ethics Program. For example, new ethics officials in the DEO are provided with a New Employee Guide and Orientation presentation as part of the onboarding process, and the DEO annually provides refresher training to ethics officials responsible for reviewing public and confidential financial disclosure reports. All ethics officials in the DOI Ethics Program are also provided substantive training on relevant ethics topics at quarterly training seminars, have an opportunity to apply to attend intensive small-group seminars on conflicts of interest or impartiality, participate in DOI Ethics Program Quarterly meetings, and attend an annual DOI Ethics Summit. In 2023, the DEO Ethics Summit provided both an opportunity to network across the Executive Branch ethics community and training on variety of ethics

---

<sup>13</sup> See 5 C.F.R. § 2638.307.

topics, ranging from ethics fundamentals for advising offboarding employees on the post-government employment ethics restrictions, as well as in depth sessions on complex issues for more experienced ethics officials, including presentations on sector mutual funds, tribal interests, gift review, ethics in emergency situations, benchmarking, ethics communications, and other topics. Finally, the DEO both encouraged and supported ethics officials in the DOI Ethics Program completing OGE's Annual Professional Ethics Practitioner (PEP) Certificate, and thirty (30) DOI ethics officials earned PEP certificates in 2023.

### Model Practices

- Providing tailored ethics training to specific groups of employees throughout the year mitigates ethics-related risks.
- The DEO provides continuous learning opportunities throughout the year for DOI ethics officials that helps them to develop their ethics skill sets to better serve employees.

### **Notices to Prospective Employees**

Written offers of employment for positions covered by the Standards of Conduct must include: a statement regarding the agency's commitment to government ethics; notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes; information on how to obtain additional information on applicable ethics requirements; and, where applicable, notice of the time frame for completing initial ethics training and information regarding the filing of new entrant financial disclosure reports.<sup>14</sup> Agencies must also establish written procedures for issuing notices to prospective employees, which the DAEO annually reviews.

OGE examined 10 samples of notices sent to prospective employees in 2023 and determined that all relevant content requirements were met.

### **Notices to New Supervisors**

An agency must provide each employee upon initial appointment to a supervisory position with certain written materials within one year of the appointment. The written materials must include contact information for the agency's ethics office and the text of 5 CFR § 2638.103; a copy of, a hyperlink to, or the address of a website containing the Principles of Ethical Conduct; and such other information as the DAEO deems necessary for new supervisors. Agencies must also establish written procedures for issuing notices to new supervisors that the DAEO annually reviews.

OGE examined five samples of notices sent to new supervisors in 2023 and determined that all relevant content requirements were met.

---

<sup>14</sup> See 5 C.F.R. § 2638.303.

## Advice and Counseling

The DAEO is required to ensure that a counseling program for agency employees concerning ethics and Standards of Conduct matters, including post-employment matters, is developed and conducted.<sup>15</sup> The DAEO may delegate to one or more deputy ethics officials the responsibility for developing and conducting the counseling program.<sup>16</sup>

OGE reviewed 18 samples of counseling and advice ethics officials provided to DOI's employees. The advice examined addressed criminal conflict-of-interest statutes, misuse of position, and gifts. The advice appeared to be responsive to the questions asked, timely, and consistent with applicable laws and regulations.

### Additional Advice and Counseling Efforts and Outreach

In addition to delivering the counseling and advice for DOI employees reviewed by OGE, in 2023, the DEO established a multi-disciplinary offboarding standard operating procedure to provide terminating employees with advice and counsel, as well as training and financial disclosure support. The DEO now provides all designated employees with comprehensive post-government guidance memoranda. This advice and counseling support is reinforced by recurring training opportunities accessible and the development and publication of innovative “quick guide” summaries on selected topics including seeking and negotiating for non-federal employment, an ethics decision tree on post-government restrictions, and a summary of post-government ethics issues related to procurement.

### Model Practice

- Proactively providing comprehensive and standardized ethics advice and counsel to departing employees in order to mitigate ethics risk and increase compliance with applicable conflicts of interests, recusal, and post-government ethics requirements.

## Agency-Specific Ethics Rules

An agency may modify or supplement the Standards of Conduct, with the concurrence of OGE, to meet the particular needs of that agency.<sup>17</sup> A supplemental standards of conduct regulation is issued jointly by the agency and OGE and is published in title 5 of the Code of Federal Regulations.

DOI's has a supplemental standards of conduct regulation at 5 C.F.R. part 3501. This regulation prohibits all employees, their spouse, and minor children from acquiring or retaining any claim, permit, lease, small tract entries, or other rights that are granted by the DOI in federal lands. Employees of the Bureau of Ocean Management, Bureau of Safety and Environmental Enforcement, or Office of Natural Resources Revenue, or are an employee of OS/SOL in a

---

<sup>15</sup> See 5 C.F.R. § 2638.203.

<sup>16</sup> See 5 C.F.R. § 2638.204.

<sup>17</sup> See Executive Order 12674 and 5 C.F.R. § 2635.105.

position classified at GS-15 or above, are prohibited from acquiring or holding any direct or indirect financial interest in federal lands or resources administered or controlled by DOI.

To evaluate the administration of DOI's supplemental regulations, OGE examined a sample of counseling provided to OS/SOL employees related to these supplemental regulations and found the counseling to be appropriate and consistent with the requirements of the supplemental regulations.

## **Conflict Remedies**

The criminal conflict of interest law prohibits an employee from participating in an official capacity in a particular matter in which he or she has a financial interest.<sup>18</sup> Congress included two provisions that permit an agency to issue a waiver of this prohibition in individual cases. Agencies must consult with OGE, where practicable, prior to issuing such a waiver.<sup>19</sup> According to DOI ethics officials, DOI did not issue any of these waivers in 2023.

Additionally, the Ethics in Government Act expressly recognizes the need for PAS nominees to address actual or apparent conflicts of interest by requiring written notice of the specific actions to be taken in order to alleviate the conflict of interest,<sup>20</sup> commonly known as an "ethics agreement." OGE determined that during the period under review, no new PAS were onboarded or required to submit an ethics agreement.

## **Enforcement**

In 2023, DOI reported no disciplinary actions for OS/SOL employees based wholly or in part upon violations of the criminal conflict of interest statutes (18 U.S.C. §§ 203, 205, 207, 208, and 209) or the Standards (5 C.F.R. part 2635).

## **Special Government Employees (SGEs)**

A special government employee (SGE) is an officer or employee of the executive or legislative branch retained, designated, appointed, or employed to perform official duties, full-time or intermittently, for not more than 130 days in any 365-day period. SGEs are required to file financial disclosure reports and receive ethics training.

According to DOI ethics officials, 11 SGEs served on boards and commissions managed by OS/SOL during the period covered by the review: The Federal Subsistence Board, Indian Arts and Crafts Board, Upper Colorado River Commission, and the Kansas-Oklahoma Arkansas River Commission.

OGE examined the ethics training received and the confidential financial disclosure reports filed by the 11 SGEs in 2023. Through a review of training records, OGE determined that

---

<sup>18</sup> See 18 U.S.C. § 208.

<sup>19</sup> See Executive Order 12674.

<sup>20</sup> See 5 U.S.C. app. § 110.

ethics training was provided to all 11 SGEs before their first meeting of the year and that it met relevant requirements for content and timeliness. OGE also examined all 11 SGE confidential reports and concluded that 10 out of 11 (91%) of the SGEs filed their reports before their first meeting and all reports were certified timely.

### Agency Comments

The U.S. Department of the Interior (DOI) appreciates the time and effort that OGE invested in this review of the DOI Ethics Program. We welcomed the opportunity to engage with OGE and provide information about the ongoing work of the DOI Ethics Program.

The work of the DOI's Departmental Ethics Office (DEO) is focused on helping employees across the DOI fulfill our mission with integrity while maintaining the public trust. The results of this Ethics Program Review both demonstrate the DEO's successful ability to maintain compliance with statutory and regulatory ethics requirements and provide us with invaluable insight into our work that will help us improve the DOI Ethics Program. Specifically, as a result of this Ethics Program Review, the DEO will prioritize efforts to improve its tracking processes so we can more effectively identify new financial disclosure filers and timely collect their reports.

It is important to note that the work and achievements of the DEO, as reflected in this Ethics Program Review, would not have been possible without DOI Leadership's constant support and dedication of resources to sustain and continually improve the quality and consistency of ethics services provided to all DOI employees. This support is exemplified by Secretary Haaland, who has repeatedly demonstrated her personal commitment to setting an example for all employees as well as cultivating an ethical culture of personal responsibility across the DOI.

We are also pleased that OGE highlighted the notable achievements where the DOI Ethics Program goes above and beyond, as noted by the four model practices listed throughout the Ethics Program Review. Finally, the work and achievements reflected above would not have been possible without the talented and dedicated team of ethics officials throughout the DEO. The DEO's ethics team makes hundreds of decisions every day, which, over the course of a year, results collectively in thousands of DOI employees trained, disclosure reports reviewed, and pieces of guidance provided. The work of the DOI Ethics Program would not be possible without the ethics team's daily commitment to doing the right thing in the right way.

We remain committed to fostering individual ethical responsibility and decision-making by DOI employees, sustaining a robust community of ethics practice at DOI and also engaging with the broader Executive Branch ethics community, ensuring that the work of the DOI Ethics Program is legally compliant, and enhancing the ethics services provided to all DOI employees. We look forward to continuing a productive and collaborative relationship with OGE.