

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Environmental Protection Agency (EPA)

Follow-up to OGE Report Number: 24-52

Report No.: 23-32F

Date: January 30, 2025

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

As a result of its review of the EPA ethics program, the Office of Government Ethics (OGE) issued three recommendations in its August 2024 review report. OGE conducted a follow-up review to assess whether the EPA has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that all versions of annual ethics training fully meet content requirements.	<p>One of the findings in the August 2024 report was that, although their live training was fully compliant with relevant requirements, EPA's 2023 interactive online training failed to address concepts related to impartiality and gifts.</p> <p>OGE examined the interactive training EPA provided in 2024. The bulk of the content dealt with financial conflicts of interest, but EPA also included animated videos to address the remaining three required concepts: impartiality, misuse of position, and gifts. OGE determined that EPA's interactive training now fully meets all applicable requirements.</p>	Closed
2	Ensure that notices to new supervisors contain all required content as specified in 5 C.F.R. § 2638.306	During the previous review, OGE found that notices sent to new supervisors in 2023 did not contain a copy of, a hyperlink to, or the address of a web site containing the 14 Principles of Ethical Conduct. EPA amended the supervisory notices which now contain a working link to the full Standards of Ethical Conduct, which includes the 14 Principles.	Closed

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3	Certify SGE advisory committee confidential financial disclosure reports in a timely manner.	<p>OGE examined the confidential reports filed by SGE members of the Clean Air Scientific Advisory Committee (CASAC) and the National Environmental Education Advisory Council (NEEEAC) in 2024.</p> <p>Overall certification timeliness improved substantially – from 47% to 88%.</p>	Closed
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Based on the results of OGE’s follow-up review, all recommendations are closed.