

ETHICS PROGRAM INSPECTION REPORT

Agency: Office of National Drug Control Policy (ONDCP)

Report No.: 22-621

Date: September 29, 2022

Period Covered by Review: January 1, 2021 through December 31, 2021

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

1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	59
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	1
1.3	Number of non-PAS public financial disclosure reports required to be filed.	26
1.4	Number of confidential financial disclosure reports required to be filed.	18
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Deputy General Counsel
1.6	Grade level of DAEO.	GS-15
1.7	Title of Alternate DAEO (ADAEO).	Attorney Advisor
1.8	Grade level of ADAEO.	GS-13
1.9	Title of the primary, day-to-day ethics program administrator.	Deputy General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-15
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	3
1.13	Number of reporting levels between the DAEO and the agency head.	2
	COMMENTS	
	Headquartered in Washington, DC, the Office of National Drug Control Policy (ONDCP) is a component of the Executive Office of the President. The mission of ONDCP is to reduce substance use disorder and its consequences by coordinating the nation's drug control policy through the development and oversight of the National Drug Control Strategy and Budget.	

2.0	LEADERSHIP			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. <i>See</i> 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. <i>See</i> 5 C.F.R. § 2638.107(a).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	COMMENTS			
	None			

3.0	PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1).			
3.1	• Collection of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	• Review/evaluation of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	• Public availability of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.4	The agency can demonstrate that late filing fees are collected or, where appropriate, waivers are issued when public filers do not timely file financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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3.6	Public financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.603(g)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.7	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.8	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after termination) notified the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	100%		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%		
3.11	Percentage of sampled non-PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%		
3.12	Percentage of sampled non-PAS public financial disclosure reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	92%		
3.13	Percentage of sampled non-PAS public financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	92%		
3.14	Percentage of sampled PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	See reviewer note		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	100%		
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
	COMMENTS			
	<p>(3.4) In May 2022, the DAEO assessed a late filing fee against an employee who failed to timely file an OGE Form 278-T report in 2021. The fined employee submitted payment to the Treasury Department for failing to file in June 2022.</p> <p>(3.7 – 3.8) ONDCP’s Human Resources staff from the Office of Operations ensures that the DAEO is notified of appointments to or terminations from positions that require incumbents to file public financial disclosure reports. ONDCP has 26 positions whose incumbents are required to file public financial disclosure reports. The DAEO (who is one of the agency’s public filers) would also be aware of pending appointments and terminations.</p> <p>(3.14 – 3.15) The only public financial disclosure report required to be filed by a PAS employee during the period covered by the inspection was the former Director’s termination report. OGE examined the report and found that it was filed, reviewed, and certified timely.</p>			

4.0	CONFIDENTIAL FINANCIAL DISCLOSURE			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C app. IV, § 402(d)(1).			
4.1	• Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	• Review/evaluation of confidential financial disclosure reports.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. <i>See</i> 5 C.F.R. § 2634.905(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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4.6	There is reasonable assurance that the lead human resources official or designee promptly (no later than 15 days after appointment) notifies the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	50%		
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	100%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	94%		
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	94%		
	COMMENTS			
	(4.2) While OGE found written procedures in place governing the administration of ONDCP’s confidential financial disclosure system, OGE noticed that these procedures included a reference to the use of the OGE Optional Form 450-A. OGE notes that effective January 1, 2019, the OGE Optional Form 450-A is no longer approved for use. OGE recommends that ONDCP update its written procedures by removing the reference of the OGE Optional Form 450-A. According to the DAEO, the language will be removed from the written procedures. ONDCP has not used OGE Optional Form 450-A since 2018.			
	(4.5) ONDCP does not have an OGE-approved alternative confidential financial disclosure system.			
	(4.7) OGE examined two new entrant confidential financial disclosure reports required to be filed in 2021. One filer entered their respective position in 2020.			

5.0	NOTICES TO PROSPECTIVE EMPLOYEES			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303.			
5.1	<ul style="list-style-type: none"> A statement regarding the agency's commitment to government ethics. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"> Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> Where applicable, notice of the time frame for completing initial ethics training. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.6	The agency has established written procedures for issuing the notice to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.8	The agency can demonstrate that there is an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
<p>(5.6) OGE found that ONDCP had written procedures in place for in processing new employees, however, OGE also noticed that the standard formal job offer template for prospective new employees (New Employee Pre-Employment Welcome Letter) did not include the required language. OGE recommends that the DAEO update its written procedures to include the standard formal job offer template. (The requirement for written procedures is largely predicated on the need to ensure continuity in the event an agency's experienced ethics officials are unavailable to administer the ethics program. Therefore, it is important for purposes of succession planning that the required template be included within the document.)</p>				

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(5.7) OGE also recommends that these procedures be updated to include the fact that the DAEO will review these written procedures each year as required by 5 C.F.R. § 2638.303(c).

6.0 NOTICES TO NEW SUPERVISORS**COMPLIANCE REQUIREMENTS****Yes****No****N/A**The agency must provide each employee upon initial appointment to a supervisory position with: *See* 5 C.F.R. § 2638.306.

6.1	• Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.7	The agency can demonstrate that there is an effective process for ensuring that new supervisors receive the required information within one year of appointment. <i>See</i> 5 C.F.R. § 2638.306(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS

(6.5 – 6.6) At the time of OGE's inspection, ONDCP had not established written procedures for issuing supervisory ethics notices. Therefore, OGE recommends the DAEO establish written procedures for issuing notices to new supervisors. OGE regulations also require the DAEO to review these written procedures annually. *See* 5 C.F.R. § 2638.306(d). Therefore, OGE also recommends that the DAEO perform annual reviews of the agency's written procedures for issuing required notices to new supervisors, once they are drafted.

7.0 INITIAL ETHICS TRAINING**COMPLIANCE REQUIREMENTS****Yes****No****N/A**Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. *See* 5 C.F.R. § 2638.304.

7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.2	The agency provided new employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DATA ANALYSIS**%**

7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	See reviewer comment
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	See reviewer comment

COMMENTS

(7.1 - 7.2) The Executive Office of the President's Office of Administration is responsible for providing new ONDCP employees with their new employee orientation. ONDCP's OGC provides the new employees with their ethics training.

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OGE examined the materials ONDCP provided to new employees to meet initial ethics training requirements and did not find links to OGE's summary of the Standards of Ethical Conduct for Federal Employees within the training materials examined. Therefore, OGE recommends the DAEO include an appropriate summary of the standards of conduct or access to them to all new employees during future training sessions.

(7.3) While OGE found a reference to new employees receiving an ethics briefing rendered by the DAEO in ONDCP's written procedures addressing its onboarding program for new employees, OGE does not believe this fully addresses the written procedure requirement. To fully meet the written procedure requirement, OGE recommends that the DAEO update its procedures to more prominently address the initial ethics training process. For example, this can be accomplished under the four phases section of ONDCP's onboarding program. (Since the requirement for written procedures is largely predicated on the need to ensure continuity in the event an agency's experienced ethics officials are unavailable to administer the ethics program, it is important that an agency's written procedures explain in detail how the required initial ethics training is accomplished).

(7.5 and 7.6) OGE was not able to independently examine ONDCP's initial ethics training records. According to the ONDCP's response on its agency questionnaire, in 2021 ONDCP had 8 new employees all of whom received initial ethics training. OGE recommends that the DAEO ensure a means of verifying that initial ethics training is received. This will also help OGE independently determine compliance during future ethics program reviews/inspections.

8.0 ANNUAL ETHICS TRAINING

COMPLIANCE REQUIREMENTS

Yes No N/A

Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. *See* 5 C.F.R. §§ 2638.307 and 2638.308.

8.1	The training presentation(s) addressed concepts related to financial conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.2	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency's ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. <i>See</i> 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.5	The agency can demonstrate it has an effective process for ensuring covered public filers, other than those whose pay is set at Level I or Level II of the Executive Schedule, complete live annual ethics training at least once every two years. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DATA ANALYSIS

Training Format

Live Interactive

Percentage of public filers who completed annual ethics training before the end of the calendar year. *See* 5 C.F.R. § 2638.308(a).

8.6	• Executive Schedule Level I and Level II. <i>See</i> 5 C.F.R. § 2638.308(e)(1).	N/A	N/A
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	N/A	N/A
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	100%	N/A
Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. <i>See</i> 5 C.F.R. § 2638.307(a)(d).			
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	100%	N/A

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8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	100%	N/A
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	Not separately tracked	Not separately tracked
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	N/A
COMMENTS			
<p>(8.2) Upon review of the training slides used to conduct annual training, OGE found that ONDCP did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them. According to the DAEO, employees are sent the training slides used to conduct annual training in advance of the training session. Previous versions of the slide deck contained a link to OGE's summary of the Standards of Ethical Conduct for Federal Employees but the link was inadvertently removed from recent versions of the slide deck. The DAEO confirmed that ONDCP will reinsert the link to OGE's summary of the Standards of Ethical Conduct for Federal Employees in the 2022 annual training slide deck.</p> <p>(8.6) The ONDCP Director and Deputy Director are Executive Schedule Level I and Level II positions, respectively. At the time of OGE's inspection, the ONDCP Deputy Director position was vacant. The ONDCP Director was confirmed in October 2021 and was not required to take annual ethics training. However, according to the DAEO, the Director did make a brief appearance at the agency's live annual ethics training session conducted in December 2021 as a way to emphasize leadership support for the ONDCP ethics program.</p> <p>(8.11) ONDCP required all its employees to receive annual ethics training during the period covered by the inspection, which OGE considers to be a model agency practice.</p> <p>(8.13) ONDCP does not have any employees required to receive annual ethics training in this category.</p>			

9.0 ETHICS ADVICE AND COUNSELING

COMPLIANCE REQUIREMENT		Yes	No	N/A
9.1	Based on a sample collected by OGE, guidance provided by agency ethics officials to employees appears to be consistent with applicable laws and regulations. <i>See</i> 5 C.F.R. § 2638.104(c)(4).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
None				

10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS**Confidential Financial Disclosure**

10.1	Number of SGEs serving on Advisory Committees and Boards.	See reviewer comment
DATA ANALYSIS		%
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	N/A
10.3	Percentage of sampled reports reviewed within 60 days of receipt but not later than the SGE's first meeting. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A

Ethics Training

COMPLIANCE REQUIREMENTS		Yes	No	N/A
Required ethics training must be provided to each SGE. <i>See</i> 5 C.F.R. §§ 2638.304 and 2638.307.				

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10.5	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See</i> 5 C.F.R. § 2638.304(e)(1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10.6	The agency provided employees with either the following written materials or written instruction for accessing them: The summary of the Standards of Conduct distributed by the Office of Government Ethics or an equivalent summary prepared by the agency; provisions of any supplemental agency regulation that the DAEO determines to be relevant or a summary of those provisions; such other written materials as the DAEO determines should be included; instructions for contacting the agency’s ethics officials. <i>See</i> 5 C.F.R. § 2638.304(e)(2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	N/A		
	COMMENTS			
	(10.1 through 10.9) ONDCP does not have any special government employees serving on advisory committees and boards.			

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	4.2	<p><u>RECOMMENDATION:</u> Update the agency's written procedures for confidential financial disclosure to remove the reference of the OGE Optional Form 450-A.</p> <p><u>AGENCY RESPONSE:</u> The language will be removed from the written procedures. ONDCP has not used OGE Optional Form 450-As since 2018.</p>	December 2022
2	5.6 – 5.7	<p><u>RECOMMENDATION:</u> Update ONDCP's written procedures for issuing notices to prospective employees by including the standard formal job offer template within the document. Ensure that these procedures indicate the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c).</p> <p><u>AGENCY RESPONSE:</u> ONDCP agrees with this recommendation and will update ONDCP's written procedures for issuing notices to prospective employees by including ethics language in the standard formal job offer template within the document. We will ensure that these procedures indicate the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.303(c).</p>	December 2022
3	6.5 - 6.6	<p><u>RECOMMENDATION:</u> Establish written procedures for issuing notices to new supervisors. Ensure that these procedures include the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.306(d).</p> <p><u>AGENCY RESPONSE:</u> ONDCP agrees with this recommendation and will establish written procedures for issuing notices to new supervisors. We will ensure that these procedures indicate the DAEO's review of these written procedures each year as required by 5 C.F.R. § 2638.306(d).</p>	December 2022
4	7.2	<p><u>RECOMMENDATION:</u> Upon review of the training slides used to conduct initial ethics training, OGE found that ONDCP did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them.</p> <p><u>AGENCY RESPONSE:</u> ONDCP agrees with this recommendation and will update ONDCP's initial ethics training materials to include a link to the summary of the Standards of Ethical Conduct.</p>	At The Time of Report Issuance

ETHICS PROGRAM INSPECTION REPORT

Agency: Office of National Drug Control Policy (ONDCP)

Report No.: 22-621

Date: September 29, 2022

Period Covered by Review: January 1, 2021 through December 31, 2021

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

5	7.3	<p><u>RECOMMENDATION:</u> Update ONDCP's written procedures governing new employee onboarding by prominently addressing ONDCP's initial ethics training process.</p> <p><u>AGENCY RESPONSE:</u> ONDCP agrees with this recommendation and will update ONDCP's written procedures governing new employee onboarding by prominently addressing ONDCP's initial ethics training process.</p>	December 2022
6	7-5 – 7.6	<p><u>RECOMMENDATION:</u> Ensure a means of verifying that initial ethics training at ONDCP is received.</p> <p><u>AGENCY RESPONSE:</u> ONDCP agrees with this recommendation and will implement a means of verifying that initial ethics training at ONDCP is received.</p>	December 2022
7	8.2	<p><u>RECOMMENDATION:</u> Upon review of the training slides used to conduct annual training, OGE found that ONDCP did not fully meet content requirements. To fully meet content requirements, ethics officials must include an appropriate summary of the standards of conduct or access to them.</p> <p><u>AGENCY RESPONSE:</u> Employees are sent the training slides used to conduct annual training in advance of the training session. Previous versions of the slide deck contained a link to OGE's summary of the Standards of Ethical Conduct for Federal Employees but the link was inadvertently removed from recent versions of the slide deck. ONDCP will reinsert the link to OGE's summary of the Standards of Ethical Conduct for Federal Employees in the 2022 annual training slide deck.</p>	At The Time of Report Issuance