

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Equal Employment Opportunity Commission

Follow-up to OGE Report Number: 24-08I

Report No.: 26-01IF

Date: December 9, 2025

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

As a result of its inspection of the U.S. Equal Employment Opportunity Commission (EEOC) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its November 2023 inspection report. OGE conducted a follow-up review to assess whether EEOC 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 EEOCs' human resources officials promptly notify the DAEO of all appointments to positions that require incumbents to file confidential financial disclosure reports.	OGE's review of the new entrant confidential report filings identified instances where new filing employees were identified only during the annual confidential filer list reconciliation. EEOC ethics officials cited potential miscommunication between field and headquarters personnel as the likely cause for the delayed identification of these filing employees. This condition was noted in OGE's November 2023 inspection report. This recommendation therefore remains open.	Open
2	Improve filing timeliness of new entrant confidential financial disclosure reports.	While EEOC's confidential new entrant filing timelines improved significantly in comparison to the results reported in the November 2023 report from 0 percent to 55 percent, further improvement is needed. This recommendation therefore remains open.	Open
3	Ensure that new employees are provided initial ethics training within three months of appointment.	OGE's review of EEOC's training logs showed that all new EEOC employees appointed between January 2024 and June 2025 received initial ethics training and only one employee did not receive the training within three months of appointment. OGE is therefore closing this recommendation.	Closed

Based on the results of OGE's follow-up review, recommendation 3 is closed while recommendations 1 and 2 remain open. OGE will conduct an additional follow-up review in approximately six months to assess whether the EEOC has taken sufficient action to resolve the deficiencies underlying the recommendations which remain open.