

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Environmental Protection Agency (EPA)

Third Follow-up to OGE Report 20-42. (See also 21-12F and 22-15F)

Report No.: 22-53F

Date: September 7, 2022

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

As a result of its review of the Environmental Protection Agency (EPA) ethics program, the Office of Government Ethics (OGE) issued 24 recommendations in its September 2020 review report (OGE Report 20-42). OGE conducted a follow-up review between December 2020 and March 2021 to assess whether the EPA had taken sufficient action to resolve the deficiencies underlying these recommendations. OGE closed recommendations 1,2, 4-7, 9, 11, 13-16, 21, and 22 in its follow-up review report issued in March 2021 (OGE Report 21-12F). OGE conducted a second follow-up review between September and November 2021 and closed recommendation 3 in its follow-up review report issued in January 2022 (OGE Report 22-15F). OGE completed its third follow-up review in September 2022. The results of the third follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
8	Ensure that new entrant confidential financial disclosure reports are filed timely.	EPA has implemented a sophisticated electronic confidential financial disclosure system since OGE's initial review in 2020. While ethics officials continue to refine the system, it has already resulted in significant improvements in the management of the confidential financial disclosure system. The electronic system allows ethics officials to reliably track financial disclosure reports from the time a report is assigned to an employee to the time the report is certified. OGE examined 21 new entrant confidential financial disclosure reports filed from May 2022 through July 2022 and found that 19 (90%) were filed timely. One report was submitted one day after the applicable due date and one was submitted seven days late. There was no indication that an extension was granted to either filer.	Closed
10	Ensure that confidential financial disclosure reports are thoroughly reviewed in order to eliminate technical reporting deficiencies.	OGE determined, through its examination of confidential financial disclosure reports, that ethics officials had thoroughly reviewed the reports and identified and resolved technical reporting deficiencies.	Closed
23	When possible, provide OGE the EPA 3110-48 reports filed by FIFRA and HSRBC members in 2019.	EPA was able to locate the reports that were initially missing and demonstrate they were accounted for and properly maintained.	Closed

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Based on the results of OGE's third follow-up review, all of the recommendations in OGE's initial review report are now closed.