

ETHICS PROGRAM INSPECTION REPORT

Agency: Office of Administration (OA), Executive Office of the President

Report No.: 26-471

Date: August 6, 2026

Period Covered by Review: January 1, 2025 through December 31, 2025

**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.	255	
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See comment below	
1.3	Number of non-PAS public financial disclosure reports required to be filed.	5	
1.4	Number of confidential financial disclosure reports required to be filed.	128	
	ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel	
1.6	Grade level of DAEO.	AD 00	
1.7	Title of Alternate DAEO (ADAEO).	Associate General Counsel	
1.8	Grade level of ADAEO.	GS-15	
1.9	Title of the primary, day-to-day ethics program administrator.	Associate 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.	1	
1.12	Current number of part-time ethics officials.	3	
1.13	Number of reporting levels between the DAEO and the agency head.	1	
	COMMENTS		
	(1.2) OA does not have any PAS positions. The Director of OA serves as the head of the agency and is a Presidential Appointment that does not require Senate confirmation.		

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).	☒	☐	☐
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).	☒	☐	☐
	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. § 13122(d)(1)			
3.1	• Collection of public financial disclosure reports.	☒	☐	☐
3.2	• Review/evaluation of public financial disclosure reports.	☒	☐	☐
3.3	• Public availability of public financial disclosure reports.	☒	☐	☐
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. <i>See</i> 5 C.F.R. § 2634.704	☐	☐	☒
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	☒	☐	☐

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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).	☐	☒	☐
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).	☒	☐	☐
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).	☒	☐	☐
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).	See comment below		
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).	N/A		
3.15	Percentage of sampled PAS termination reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(e).	N/A		
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).	N/A		
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).	N/A		
COMMENTS				
(3.4) OA did not have any late filing fees collected, or waivers issued during the inspection period. (3.6) OGE found public reports that were beyond the six-year retention period. Unless the reports are related to ongoing investigations, OGE recommends removal of the reports from the Integrity system pursuant to 5 C.F.R. § 2634.603(g)(1). (3.10) During the period of inspection, OA had no non-PAS annual reports. (3.14 - 3.17) OA does not have any PAS positions.				

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. § 13122(d)(1)			
4.1	• Collection of confidential financial disclosure reports.	☒	☐	☐
4.2	• Review/evaluation of confidential financial disclosure reports.	☒	☐	☐
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	☒	☐	☐
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	☐	☐	☐
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.	☒	☐	☐

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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. See 5 C.F.R. § 2638.105(a)(1).	☒	☐	☐
	DATA ANALYSIS	%		
4.7	Percentage of sampled confidential new entrant reports filed timely. See 5 C.F.R. § 2634.903(b).	82%		
4.8	Percentage of sampled confidential annual reports filed timely. See 5 C.F.R. § 2634.903(a).	100%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. See 5 C.F.R. § 2634.605(a).	100%		
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. See 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	100%		
	COMMENTS			
	(4.4) OGE did not conduct an independent examination of the confidential system used by OA, as it did for the public reports in OGE's Integrity e-filing system. However, after discovering that some public reports in the Integrity system exceeded the six-year retention period, OGE recommends that ethics officials review confidential reports to ensure that records do not exceed the applicable retention period. (4.5) OA does not have an OGE-approved alternative confidential financial disclosure system. (4.7) To evaluate the timeliness of new entrant confidential financial disclosure reports, OGE selected 11 new entrant confidential reports submitted during the inspection period. Of these, nine reports (82%) were filed timely, while two reports were filed late (18%). OGE initially identified two other new entrant reports that had appeared to have been filed almost a year late. However, after discussions with ethics officials, OGE was advised that these two reports were filed by current employees who were assigned new duties or responsibilities throughout the year that triggered the confidential filing requirement. Instead of the filer reporting the date in which they entered the filing position they reported the date they were hired by OA. While OGE is not issuing a formal recommendation in this area, OGE suggests that ethics officials amend both reports with the correct date and continually monitor the new entrant confidential filing process to ensure that the steps established to address timely new entrant filing are effective.			

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	A statement regarding the agency's commitment to government ethics.	☒	☐	☐
5.2	Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	☒	☐	☐
5.3	Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	☒	☐	☐
5.4	Where applicable, notice of the time frame for completing initial ethics training.	☒	☐	☐
5.5	Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	☒	☐	☐
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).	☒	☐	☐
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	☒	☐	☐
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.	☒	☐	☐
COMMENTS				
	None			

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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: <i>See 5 C.F.R. § 2638.306.</i>			
6.1	• Contact information for the agency's ethics office.	☒	☐	☐
6.2	• The text of 5 C.F.R. § 2638.103.	☒	☐	☐
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	☒	☐	☐
6.4	• Other information the DAEO deems necessary.	☒	☐	☐
6.5	The agency has established written procedures for supervisory ethics notices. <i>See 5 C.F.R. § 2638.306(d).</i>	☒	☐	☐
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.306(d).</i>	☒	☐	☐
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 5 C.F.R. § 2638.306(b).</i>	☒	☐	☐
COMMENTS				
None				

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. <i>See 5 C.F.R. § 2638.304.</i>			
7.1	The training presentation(s) addressed concepts related to conflicts of interest, impartiality, misuse of position and gifts. <i>See 5 C.F.R. § 2638.304(e)(1).</i>	☒	☐	☐
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 5 C.F.R. § 2638.304(e)(2).</i>	☒	☐	☐
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See 5 C.F.R. § 2638.304(f).</i>	☒	☐	☐
DATA ANALYSIS		%		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	See comment below		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	See comment below		
COMMENTS				
(7.5 – 7.6) In its 2025 Annual Ethics Program Questionnaire, OA self-reported that 48 new employees completed initial ethics training (IET) during the inspection period. Of these, 31 (65%) completed their training within the required timeframe. Nearly all (16 of 17) employees were unable to timely complete the required training because they were on furlough during the 2025 lapse in Government Appropriations. The other employee left the agency before completing the required training. OGE is not issuing a recommendation in this area.				

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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. <i>See</i> 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).	☒	☐	☐
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. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).	☒	☐	☐
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).	☒	☐	☐
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).	☒	☐	☐
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).	☐	☐	☐
	DATA ANALYSIS	Training Format		
		Live	Interactive	
	Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See</i> 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	100%	
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	N/A	100%	
	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).			
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	N/A	97%	
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).	N/A	93%	
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	N/A	See 8.11	
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	See 8.11	
	COMMENTS			
	(8.6, 8.10 and 8.12) OA did not have any employees in these categories. (8.11 - 8.13) Many of these employees fell within more than one category. <u>Model Practice Identified</u> (8.13) During the inspection period, agency ethics officials required non-filers to receive annual ethics training.			
	ETHICS ADVICE AND COUNSELING			
	COMPLIANCE REQUIREMENT	Yes	No	N/A

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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).	☐	☐	☒
	COMMENTS			
	(9.1) OA did not provide any written ethics counseling during the period covered by the inspection.			

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 comment below
	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.			
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).	☐	☐	☒
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).	☐	☐	☒
	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			
	(10.0 – 10.9) OA does not have any special government employees serving on advisory committees and boards.			

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ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
3,6	<u>RECOMMENDATION:</u> Ensure that public reports that are beyond the six-year retention period are destroyed in compliance with 5 C.F.R. § 2634.603(g)(1). <u>AGENCY RESPONSE:</u> OA has deleted public reports from Integrity that are beyond the six-year retention period. There are a small number of records we are unable to delete from the system, but we will work with Integrity support to ensure the records are destroyed.
4.4	<u>RECOMMENDATION:</u> Ensure that confidential reports that are beyond the six-year retention period are destroyed in compliance with 5 C.F.R. § 2634.604. <u>AGENCY RESPONSE:</u> OA has destroyed confidential reports that are beyond the six-year retention period, including physical records as well as records stored in our electronic confidential disclosure portal.
4.7	<u>RECOMMENDATION:</u> Ensure that all new entrant confidential financial disclosure reports, particularly with regard to current employees who are assigned new duties or responsibilities throughout the year that trigger the confidential filing requirement, are filed timely as required by 5 C.F.R. § 2634.903(b). <u>AGENCY RESPONSE:</u> OA will adjust the automatic reminder notifications that are sent from OA's ethics portal to encourage more timely submissions of new entrant confidential financial disclosure reports.