

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Privacy and Civil Liberties Oversight Board (PCLOB)

Follow-up to OGE Report Number: 24-014I

Report No.: 25-60IF

Date: June 12, 2025

UNITED STATES OFFICE OF
GOVERNMENT ETHICSPreventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Privacy and Civil Liberties Oversight Board (PCLOB) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its December 2023 review report. OGE conducted a follow-up review to assess whether PCLOB 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 OGE has received an up-to-date designation from the agency head naming the ADAEO.	PCLOB provided OGE with an up-to-date ADAEO designation.	Closed
2	Ensure that PAS annual and termination reports are reviewed and certified within 60 days of receipt	OGE reviewed a sample of 5 PAS annual and termination reports and found that 2 (40%) were certified timely.	Open
3	Ensure that SGEs receive timely annual ethics training.	OGE found that PCLOB provided timely annual ethics training to all four of their SGEs in 2024. OGE reminds PCLOB to ensure that employees are provided 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.	Closed

Based on the results of OGE's follow-up review, recommendations 1 and 3 are closed. OGE will conduct an additional follow-up review in approximately 12 months to assess whether PCLOB has taken sufficient action to resolve the deficiencies underlying the recommendation which remain open.