

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: U.S. Department of Health and Human Services
(HHS) Office of the Secretary

Follow-up to OGE Report Number: 24-46

Report No.: 25-76F

Date: July 30, 2025

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

As a result of its review of the Department of Health and Human Services Office of the Secretary's ethics program, the Office of Government Ethics (OGE) issued two recommendations in its July 2024 program review report. OGE conducted a follow-up review to assess whether the HHS 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 new entrant confidential reports are filed timely.	<p>OGE examined 26 HHS new entrant confidential financial reports filed in 2023 during its program review and found that 18 or (69%) were filed timely.</p> <p><u>OGE Finding:</u> OGE reviewed 34 HHS new entrant confidential financial disclosure reports filed in 2024. Of these reports, 30 (88%) were filed timely.</p>	Closed
2	Ensure all new employees are provided initial ethics training within three months of appointment as required by 5 C.F.R. § 2638.304(b).	<p>In the program review report, OGE determined that of the 465 new Office of the Secretary employees required to receive IET in 2023, 77% received the training within the three months of their appointment, as required.</p> <p><u>AGENCY RESPONSE:</u> HHS Ethics Division had implemented new procedures to remedy this shortfall in timely completion of initial ethics training.</p> <p><u>OGE Finding:</u> OGE reviewed documentation of IET in the first half of 2025 and determined of the 167 new Office of the Secretary employees, 97% received the training and 96% received the training within three months of their appointment, as required.</p>	Closed

Based on the results of OGE's follow-up review, all recommendations are closed.