

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

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

1.0	<b>AGENCY DATA</b>		
	<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.		21
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.		1
1.3	Number of non-PAS public financial disclosure reports required to be filed.		6
1.4	Number of confidential financial disclosure reports required to be filed.		128
	<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel and Chief Operations Officer	
1.6	Grade level of DAEO.	SES	
1.7	Title of Alternate DAEO (ADAEO).	Attorney-Advisor	
1.8	Grade level of ADAEO.	GS-13	
1.9	Title of the primary, day-to-day ethics program administrator.	Attorney-Advisor	
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-13	
1.11	Current number of full-time ethics officials.	2	
1.12	Current number of part-time ethics officials.	0	
1.13	Number of reporting levels between the DAEO and the agency head.	1	
	<b>COMMENTS</b>		
	None.		

2.0	<b>LEADERSHIP</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>COMMENTS</b>			
	None.			

3.0	<b>PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. app. IV, § 402(d)(1).			
3.1	• Collection of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	• Review/evaluation of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	• Public availability of public financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3.5	Public financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-901

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

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

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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		%		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(b).	N/A		
3.10	Percentage of sampled non-PAS annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.201(a).	100%		
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).	100%		
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).	100%		
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).	100%		
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).	100%		
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).	100%		
COMMENTS				
3.4: No filers were required to pay a late fee during the period covered by this review. 3.9, 3.14: There were no Non-PAS new entrant reports required and no PAS annual reports required during the period covered by this review. 3.9 – 3.17: OGE reviewed OSTP documents from calendar year 2024 during this inspection. OGE assessed financial disclosure report samples from calendar year 2025 because of their availability and to consolidate a follow-up review with this current inspection.				

<b>4.0</b>	<b>CONFIDENTIAL FINANCIAL DISCLOSURE</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C app. IV, § 402(d)(1).			
4.1	• Collection of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.2	• Review/evaluation of confidential financial disclosure reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.3	Confidential financial disclosure reports are securely maintained. <i>See</i> OGE/GOVT-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. <i>See</i> 5 C.F.R. § 2634.604.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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. <i>See</i> 5 C.F.R. § 2638.105(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>DATA ANALYSIS</b>	<b>%</b>		

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

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

4.7	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	100%
4.8	Percentage of sampled confidential annual reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(a).	87%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	93%
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	93%
<b>COMMENTS</b>		
4.7-4.10: Similar to the public financial disclosure report samples collected in section 3 above, OGE assessed financial disclosure report samples from calendar year 2025 because of their availability and for efficiency. See the Issues Resolved section below for findings involving the 2024 reports.		

<b>5.0 NOTICES TO PROSPECTIVE EMPLOYEES</b>				
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.7	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.303(c).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
None.				

<b>6.0 NOTICES TO NEW SUPERVISORS</b>				
<b>COMPLIANCE REQUIREMENTS</b>		<b>Yes</b>	<b>No</b>	<b>N/A</b>
The agency must provide each employee upon initial appointment to a supervisory position with: <i>See</i> 5 C.F.R. § 2638.306.				
6.1	• Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	• The text of 5 C.F.R. § 2638.103.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	• Other information the DAEO deems necessary.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6.5	The agency has established written procedures for supervisory ethics notices. <i>See</i> 5 C.F.R. § 2638.306(d).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.6	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.306(d).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

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

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</i> 5 C.F.R. § 2638.306(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>				
6.1 – 6.6: OGE found that OSTP issues a combined notice to all new hires, which includes all required information for both prospective employees and new supervisors. OSTP did not have any new supervisors in 2024, but since this required information is included as part of a consolidated review that covers all staff in 2024 – the requirements for 6.1 – 6.4 were examined. 6.6: OSTP explained that written procedures did not receive an annual review in 2024, because the agency did not hire any new supervisors. Based on OGE's review, OSTP revised procedures covering the issuance of notices to new supervisors and prospective employees by adding in the requirement that they both receive an annual review as required by 5 C.F.R. § 2638.306(d). This issue is resolved.				

<b>7.0</b>	<b>INITIAL ETHICS TRAINING</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.			
7.1	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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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</i> 5 C.F.R. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	The agency's written procedures are reviewed by the DAEO each year. <i>See</i> 5 C.F.R. § 2638.304(f).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>DATA ANALYSIS</b>	<b>%</b>		
7.5	Percentage of new employees who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See</i> 5 C.F.R. § 2638.304(b).	100%		
	<b>COMMENTS</b>			
	None.			

<b>8.0</b>	<b>ANNUAL ETHICS TRAINING</b>			
	<b>COMPLIANCE REQUIREMENTS</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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. § 2638.304(e)(2).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**ETHICS PROGRAM INSPECTION REPORT**

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

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

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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
<b>DATA ANALYSIS</b>		<b>Training Format</b>				
		<b>Live</b>	<b>Interactive</b>			
	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).	<b>None</b>	<b>100%</b>			
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	<b>N/A</b>	<b>N/A</b>			
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	<b>None</b>	<b>100%</b>			
	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)(d).					
8.9	• Employees required to file an annual confidential financial disclosure report. <i>See</i> 5 C.F.R. § 2638.307(a)(1).	<b>None</b>	<b>100%</b>			
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	<b>N/A</b>	<b>N/A</b>			
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	<b>N/A</b>	<b>N/A</b>			
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	<b>N/A</b>	<b>N/A</b>			
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	<b>N/A</b>	<b>N/A</b>			
<b>COMMENTS</b>						
	8.2: OGE's review found that OSTP did not sufficiently provide the Standards of Conduct as part of the annual training for 2024. During the course of OGE's review, OSTP updated annual ethics training procedures by including the practice of sending out a copy of the Standards of Conduct in an email reminder by the end of August of each year and by providing a copy with the annual email notification for each year's training course launch. OGE found this new and permanent practice sufficiently resolved this recurring issue. 8.5, 8.7: OSTP does not have any PAS officials with pay set at these levels. 8.6: OSTP did not provide live annual training in 2024 as required for PAS officials at the Executive Schedule Level I or II. 8.10 – 8.13: OSTP does not have any employees in these positions that are required to receive annual ethics training.					

**9.0 ETHICS ADVICE AND COUNSELING**

	<b>COMPLIANCE REQUIREMENT</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>COMMENTS</b>			
	None			

## ETHICS PROGRAM INSPECTION REPORT

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest  
in the Executive Branch

### 10.0 SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS

#### Confidential Financial Disclosure

10.1	Number of SGEs	17
	<b>DATA ANALYSIS</b>	<b>%</b>
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	82%
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).	82%
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	82%

#### 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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	50%		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	50%		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	100%		
	COMMENTS			
	10.7 – 10.8: In OGE’s 2022 Inspection of OSTP’s ethics program, a recommendation was issued for a low percentage of initial ethics training completions at 57% (4 out of 7) for 2021. During OGE’s follow-up review in 2024, OSTP made measurable progress towards resolving this issue by increasing their completion percentage to 73% (11 out of 15) for 2022 and 2023. In OGE’s 2025 inspection, it was found that 50% (4 out of 8) SGEs received IET in 2024 and 50% (4 out of 8) received this training timely.			

### ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
4.7, 4.8	<b>ISSUE:</b> OGE initially examined samples of 2024 confidential financial disclosure reports and found that 32% (8 out of 25) of new entrant reports and 33% (9 out of 27) of annual reports were filed late. Of these late reports, three new entrant reports and three annual reports were not collected for periods ranging from nine months to thirteen months. Further, it was later identified that two of these new entrant filers had a conflict of interest with their duties at OSTP that should have been addressed. These issues require a recommendation. Because all 2025 reports became available during OGE's review, OGE examined all 2025 reports (consolidation of follow-up review) and found that 100% (15 out of 15) of new entrant reports and 87% (13 out of 15) of annual reports were filed timely. These totals are listed above in 4.7 and 4.8. The 2025 reports did not reveal any issues with report collection that spanned an unreasonable length of time nor any instances of unaddressed conflicts of interest. As a result, this recommendation is closed.

## ETHICS PROGRAM INSPECTION REPORT

Agency: Office of Science and Technology Policy (OSTP)

Report No.: 25-90I

Date: September 19, 2025

Period Covered by Review: January 1, 2024 through July 31, 2025

## UNITED STATES OFFICE OF GOVERNMENT ETHICS



Preventing Conflicts of Interest  
in the Executive Branch

### AGENCY RESPONSE:

6.6

ISSUE: Based on OGE's review, OSTP revised SOPs covering the issuance of notices to new supervisors and prospective employees by adding in the requirement that they both receive an annual review as required by 5 C.F.R. § 2638.306(d)

### AGENCY RESPONSE:

8.2

ISSUE: Based on OGE's review, OSTP updated annual ethics training procedures to include the Standards of Conduct with the annual email notice for the training's launch.

### AGENCY RESPONSE:

## RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	8.6	<u>RECOMMENDATION:</u> Ensure that live annual ethics training is provided to all PAS officials at the Executive Schedule Level I or II. <u>AGENCY RESPONSE:</u>	
2	10.7, 10.8	<u>RECOMMENDATION:</u> Ensure that SGEs receive ethics training as required. <u>AGENCY RESPONSE:</u>	

## GENERAL AGENCY COMMENTS