

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Department of Labor

Follow-up to OGE Report Number: 24-48

Report No.: 25-94IF

Date: September 30, 2025

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

As a result of its review of the U.S. Department of Labor (DOL) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its August 2024 review report. OGE conducted a follow-up review to assess whether the DOL 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 and termination public financial disclosure reports are filed timely.	<p>OGE reviewed 40 samples of New Entrant and Termination public financial disclosure reports. In total, 100% of reports sampled were filed timely. However, only 65% of New Entrant reports were certified timely.</p> <p><u>Agency Response:</u> From 2022 to 2025, the ethics team at DOL consisted of an ADAEO, a Counsel for Ethics, a Program Manager, and 3.5 FTE staff attorneys, to serve a population of approximately 14,000 employees across the United States. As of September 2025, due to departures, the federal hiring freeze, and the Deferred Resignation Program, the ADAEO, Program Manager, and 1 FTE staff attorney remain. The program continues to utilize other agency staff resources as possible to meet regulatory requirements but has experienced delays in final certifications of Annual and New Entrant reports given the resulting staffing shortage and the need to address other mission-critical priorities.</p>	Closed
2	Ensure that SGEs file confidential financial disclosure reports in a timely manner.	According to DOL's ethics office, all DOL SGE FACA committees were eliminated or paused indefinitely. OGE will close this recommendation because there are no active FACA committees and consequently no data available for review.	Closed
3	Ensure that SGEs receive IET in a timely manner.	According to DOL's ethics office, all DOL SGE FACA committees were eliminated or paused indefinitely. OGE will close this recommendation because there are no active FACA committees and consequently no data available for review.	Closed

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Report No.: 25-94IF

Date: September 26, 2025

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