



Ethics Program Review

Department of the Treasury
Departmental Offices

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The United States Office of Government Ethics (OGE) conducted a review of the ethics program administered within the Department of the Treasury’s (Treasury) Departmental Offices¹ from January through May, 2025. The review covered program activities for calendar year 2024. The following summarizes the results of that review.

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Objectives, Scope and Methodology

Objectives: OGE provides leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. The Ethics in Government Act gives OGE the authority to evaluate the effectiveness of executive agency ethics programs.² OGE uses this evaluation authority largely to conduct reviews of agency ethics programs. The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program.

Scope: OGE’s review examined all elements of the Treasury Departmental Offices ethics program including program administration, financial disclosure, education and training, ethics advice and counseling, agency-specific ethics rules on outside employment,³ conflict remedies, enforcement, and special government employees.

Methodology: OGE examined a variety of documents provided by Treasury ethics officials, including the Treasury response to OGE’s 2024 Annual Agency Ethics Program Questionnaire, written procedures for administering the ethics program, samples of public and

¹ The Department of the Treasury is organized into two major components, the Departmental Offices and the operating bureaus. The Departmental Offices are primarily responsible for the formulation of policy and management of the department as a whole, while the operating bureaus carry out the specific operations assigned to the department. OGE’s review examined the ethics program as it was administered within the Departmental Offices.

² See 5 U.S.C. app. § 13122 and 5 C.F.R. part 2638.

³ Treasury has a supplemental standards of conduct regulation at 5 C.F.R. part 3101 requiring employees to obtain written approval prior to engaging in outside employment.

confidential financial disclosure reports filed in 2024, ethics training materials, and a sample of the ethics advice and counsel provided to employees. In addition, OGE clarified with ethics officials the information gathered and followed up on issues identified during the review.

Agency Background

Treasury's mission is to maintain a strong economy and create economic and job opportunities by promoting the conditions that enable economic growth and stability at home and abroad, strengthen national security by combating threats and protecting the integrity of the financial system, and manage the U.S. government's finances and resources effectively.

Program Administration

The Treasury Departmental Offices (DO) Ethics Office is located within the General Counsel's office. Treasury's Designated Agency Ethics Official (DAEO) is the Assistant General Counsel, General Law, Ethics & Regulation (GLER) and is responsible for coordinating and managing the department's ethics program. The Alternate Designated Agency Ethics Official (ADAEO) is the Deputy Assistant General Counsel for Ethics and assists the DAEO in the administration of the ethics program. In 2024, the DAEO and the ADAEO were assisted in managing the ethics program by ethics attorneys (two senior counsels and two attorney-advisors) and an Ethics Program Manager.

During the period covered by OGE's review, the ethics attorneys provided the full range of advice and counseling, financial disclosure review, and ethics training. The Ethics Program Manager, who retired at the end of 2024, was responsible for daily ethics program operations, including compliance with all requirements and administration of systems and procedures. A paralegal specialist and a staff assistant who provided intermittent data entry and other administrative support to the ethics program also both retired in 2024.

Designated Ethics Officials

The administration of the Treasury ethics program department-wide is decentralized. At the DO level, the program is administered directly by the DO Ethics Office. The DO Ethics Office also manages the ethics services for all of Treasury's Presidentially Appointed, Senate-confirmed (PAS) officials.

At the bureau level, the bureau Chief Counsels serve as Deputy Ethics Officials (DEO) and are responsible for administering the bureaus' ethics programs. The DO Ethics Office provides guidance to the DEO-led bureaus' ethics programs.

In 2023 and 2024, the ADAEO conducted "mini-program reviews" of each of the seven bureaus and four Offices of Inspector General (OIG) to assess the ethics programs in the department and provide feedback to the DEOs. In addition, according to the ADAEO, during the course of preparing the OGE Annual Questionnaire, the ADAEO identifies any bureau program areas that might warrant further attention. For example, if the ADAEO noted that a number of public financial disclosure reports were being initially reviewed or certified beyond the 60-day

review period, he would contact the bureau ethics office to see whether they are having staffing issues, etc.

Model Practice

OGE identifies model practices and shares them when it appears they may benefit other executive branch agency ethics programs. OGE considers the following to be a model practice implemented at the Treasury Departmental Offices.

- The ADAEO conducting program reviews of the Department of the Treasury's bureaus ethics programs and Offices of Inspector General to assess the ethics programs agencywide.

Financial Disclosure

Title I of the Ethics in Government Act requires that agencies administer public and confidential financial disclosure systems. Financial disclosure serves to prevent, identify, and resolve conflicts of interest by providing for a systematic review of the financial interests of officers and employees. The financial disclosure process also offers an opportunity for ethics officials to provide ethics-related counseling to report filers.

To evaluate the Treasury DO financial disclosure systems, OGE evaluated the required written procedures for administering the systems and a sample of public and confidential financial disclosure reports required to be filed by DO employees. OGE also evaluated whether the DO have established procedures to ensure that human resources promptly notifies the DO Ethics Office of new and departing employees and whether new employees and supervisors are notified of their ethics responsibilities.

Financial Disclosure Written Procedures

Each executive branch agency must establish written procedures for collecting, reviewing, evaluating, and where applicable, making available to the public, financial disclosure reports filed by the agency's officers and employees.⁴ OGE examined Treasury Directive 61-01 on the implementation of the public financial disclosure requirements and determined it met all applicable requirements. Likewise, OGE examined Treasury Directive 61-02 on the implementation of the confidential financial disclosure report filing requirements and found it also met all applicable requirements.

Notices to the DAEO

Agency human resources offices play a vital role in ensuring the effective administration of the ethics program. Without the necessary information about agency employees, ethics officials cannot successfully carry out their important work. Among other things, the lead human

⁴ See 5 U.S.C. § 13122.

resources official is required to notify the DAEO of all appointments to positions that require incumbents to file public or confidential financial disclosure reports no later than 15 days after the appointment. The lead human resources official must also notify the DAEO of terminations of employees in positions that require incumbents to file public financial disclosure reports no later than 15 days after termination.⁵ This supports the timely collection of financial disclosure reports.

Notices for Public Financial Disclosure Filers

For political appointee public filers, the DO Ethics Office works in conjunction with the Treasury White House Liaison Officer (WHLO) of incoming political appointees in doing a pre-appointment clearance review. One of Treasury's ethics attorneys reviews the appointee's information for any potential conflicts with their future duties. Once any potential conflicts are mitigated, the Ethics Office notifies WHLO that the candidate can proceed and an email is generated notifying the DO Ethics Office, among other offices, of the onboarding date of the appointee. With regard to departing political employees, Treasury Executive Resources notifies the DO Ethics Office of the departure dates of these employees.

For career public filers, once notified of a tentative selection to the SES/SL level by the Office of Human Resources (OHR), a DO Ethics Office attorney conducts a conflicts of interest review for the prospective employee. This pre-appointment review occurs irrespective of whether the candidate is an internal promotion of a GS-15, a lateral movement of a current SES/SL, or an outside selection. Once the pre-appointment review is completed, the DO Ethics Office notifies OHR that the candidate can proceed and an email is generated to notify the Ethics Office of the new employee's onboarding date. The DO Ethics Office then creates an account for the filer in *Integrity*, OGE's electronic public financial disclosure system, and assigns the filer a new entrant public financial disclosure report (OGE Form 278). OHR sends bi-weekly separations reports to keep the DO Ethics Office informed of departing career employees who will need to file termination reports.

Notices for Confidential Financial Disclosure Filers

The DO OHR notifies the DO Ethics Office by email of new hires and career internal promotions and their effective dates. The DO Ethics Office then reaches out to the supervisor of the new or promoted employee with a job aid to help determine whether the employee should file an OGE confidential financial disclosure report (OGE Form 450). Based on the supervisor's responses, if appropriate, a new entrant OGE Form 450 is assigned and the employee is notified of their requirement to file.

Based on its evaluation of Treasury's notification procedures and review of a sample of notices, OGE determined there is reasonable assurance that human resources promptly notifies the DO Ethics Office of appointments to positions whose incumbents are required to file public and confidential financial disclosure reports. OGE also determined that there is reasonable

⁵ See 5 C.F.R. § 2638.105(a)(1) and (2).

assurance that human resources timely notifies the DO Ethics Office when employees who are required to file public financial disclosure reports are leaving their positions.

Public Financial Disclosure

Within 30 days of assuming a covered public filing position, an individual must file a public financial disclosure report.⁶ The individual must subsequently file an annual report by May 15 each year and a termination report within 30 days of departing the public filing position.⁷ The reports are required to be reviewed for potential conflicts of interest and certified within 60 days of receipt by the ethics office, unless additional information is being sought from the filer or remedial action is being taken.⁸

To evaluate the administration of the public financial disclosure system administered within Treasury DO, OGE examined a sample of 138 of the 345 that were required to be filed by DO employees in 2024. This sample included 54 new entrant, 50 annual, and 34 termination reports. Table 1 below presents the results of OGE’s examination.

Table 1. OGE’s Examination of Treasury’s DO Public Financial Disclosure Reports

	New Entrant		Annual		Termination	Total
Reports Examined	54		50		34	138
Filed Timely	48	(89%)	50	(100%)	31 (91%)	129 (93%)
Certified within 60 Days	53	(98%)	50	(100%)	34 (100%)	137 (99%)

As noted in Table 1, OGE’s review found that 129 (93%) of the public reports were filed timely, and 137 (99%) were reviewed timely and certified within 60 days.

Confidential Financial Disclosure

Within 30 days of assuming a covered confidential filing position, an individual must file a confidential financial disclosure report.⁹ The individual must also subsequently file an annual report by February 15 each year.¹⁰ The reports are required to be reviewed for potential conflicts of interest and certified within 60 days of receipt by the ethics office. Final certification may, of necessity, occur later, when additional information is being sought from the filer or remedial action is being taken.¹¹

To evaluate the administration of the confidential financial disclosure system administered within DO, OGE examined a sample of 73 of the 1,085 reports that were required

⁶ See 5 C.F.R. § 2634.201(b).AA

⁷ See 5 C.F.R. § 2634.201(a) and (e).

⁸ See 5 C.F.R. § 2634.605.

⁹ See 5 C.F.R. § 2634.903(b).

¹⁰ See 5 C.F.R. § 2634.903(a).

¹¹ See 5 C.F.R. § 2634.605.

to be filed in 2024 by DO employees. This sample included 31 new entrant and 42 annual confidential reports that were required to be filed in 2024. Table 2 below presents the results of OGE’s examination.

Table 2. OGE’s Examination of Treasury’s DO Confidential Financial Disclosure Reports

	New Entrant	Annual	Total
Reports Examined	31	42	73
Filed Timely	27 (87%)	42 (100%)	69 (95%)
Certified within 60 Days	27 (87%)	42 (100%)	69 (95%)

As noted in Table 2, OGE’s review found that 69 (95%) of the reports were filed timely, and 69 (95%) were reviewed timely and certified within 60 days.

Education and Training

Each executive branch agency is responsible for maintaining a compliant government ethics education program. An ethics education program is essential to raising awareness among employees about applicable ethics laws and rules and the availability of agency ethics officials to provide ethics counseling. The training program must include: briefings for certain PAS employees; notices for prospective employees and newly appointed supervisors regarding their ethics-related obligations; initial ethics training for new employees; and annual ethics training for public and confidential financial disclosure report filers and certain other employees.¹²

Ethics Briefing for Certain Agency Leaders

Certain PAS officials must complete an ethics briefing to discuss their immediate ethics obligations no later than 15 days after their appointment, unless the DAEO grants an extension. Any extension of more than 15 days requires the DAEO to make a written determination that extraordinary circumstances make it necessary to provide the briefing at a later date.¹³

No Treasury PAS officials required an ethics briefing during the period covered by OGE’s review.

Notices to Prospective Employees

Written offers of employment for positions covered by the Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) must include: a statement regarding the agency’s commitment to government ethics; notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes; information on how to obtain additional information on applicable ethics requirements; and, where applicable,

¹² See 5 C.F.R. Part 2638 Subpart C.

¹³ See 5 C.F.R. § 2638.305.

notice of the time frame for completing initial ethics training and information regarding the filing of new entrant financial disclosure reports.¹⁴

OGE examined the procedures established by Treasury's DO Ethics Office to provide notices to prospective employees and a sample of notices that were sent to prospective employees in 2024. Based on this examination, OGE determined that there was reasonable assurance that prospective employees within DO receive the required information along with their written offers of employment.

Notices to New Supervisors

An agency must provide each employee upon initial appointment to a supervisory position with certain written materials within one year of appointment. The written materials must include: contact information for the agency's ethics office and the text of the regulation specifying the government ethics responsibilities of supervisors;¹⁵ a copy of, a hyperlink to, or the address of a web site containing the Principles of Ethical Conduct; and such other information as the DAEO deems necessary for new supervisors.¹⁶

OGE examined the procedures used by the DO Ethics Office to provide new supervisors with the required written materials. Under these procedures, OHR sends an email to the Ethics Office regarding employees who have been appointed, reassigned, or promoted into a supervisory position. The Ethics Office then notifies the employee of their requirement to take the interactive New Supervisor's Ethics Training in the online Treasury Learning Management System. The training contains the information required by regulation, as well as information on ethics topics that supervisors must frequently address, such as designating confidential financial disclosure filers, acting in an SES position, outside activities, financial conflicts, covered relationships, and gifts between employees. Based on OGE's examination, OGE determined that there was reasonable assurance that new supervisors receive the required information once they have been identified as new supervisors.

Initial Ethics Training

Each new employee subject to the Standards of Conduct must complete initial ethics training within three months of appointment, unless excluded by the DAEO. The training must be interactive and focus on government ethics laws and regulations that the DAEO deems appropriate. The training must address: financial conflicts of interest, impartiality, misuse of position, and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.¹⁷

¹⁴ See 5 C.F.R. § 2638.303.

¹⁵ See 5 C.F.R. § 2638.103.

¹⁶ See 5 C.F.R. § 2638.306.

¹⁷ See 5 C.F.R. § 2638.304.

New entrant public filers (SES, SL, Schedule C, and certain others) receive a virtual or live briefing called the Senior Leader General Law and Ethics Briefing, which is provided by the DO Ethics Office. The agency indicated that the briefings are held periodically, generally within 30-60 days of onboarding, or upon reaching a critical mass of these senior employees. The agency indicated that the briefing serves to educate DO employees on the importance of ethics at the department and encourages them to contact the ethics officials regularly. OGE reviewed the content of the briefings and found the materials met applicable content requirements. Materials reviewed by OGE outlined the major ethics rules and general law issues including gifts from outside sources and gifts between employees, financial conflicts of interests, impartiality, and misuse of position.

All other new hires take interactive ethics training within two weeks of their hire date and complete a brief online ethics questionnaire so Ethics Office can spot problematic issues and be proactive in providing counseling for financial interests. Employees are given written instructions on how to fill out their new employee forms, access the interactive New Employee Training Module, and are given a digital copy of the Department of the Treasury Ethics Handbook, along with Treasury DO ethics officials contact information. OGE reviewed the IET materials Treasury provided in 2024 and determined that it met applicable content and format requirements.

Written Procedures for Initial Ethics Training

Agencies are required to establish written procedures for, among other things, initial ethics training, which the DAEO must review each year.¹⁸ Further, in agencies with 1,000 or more employees, any office that is not under the supervision of the DAEO, but has been delegated responsibility for issuing notices or conducting training, must submit the following materials to the DAEO by January 15 each year: a written summary of procedures that office has established to ensure compliance with initial ethics training requirements; and written confirmation that there is a reasonable basis for concluding that the procedures have been implemented.¹⁹

The Treasury DO standard operating procedures (SOP) governing this activity designate the responsible office(s) for providing and tracking IET. The DAEO, ADAEO, and Ethics Program Manager periodically ensure that all aspects of this SOP are being executed. OGE determined during its review of agency procedural documents and tracking records that Treasury has established written procedures for providing IET within the DO. Moreover, OGE determined that of the 449 DO employees required to receive IET in 2024, 98% received it within the three months of their appointment, as required.

¹⁸ See 5 C.F.R. § 2638.304.

¹⁹ See 5 C.F.R. § 2638.310.

Annual Ethics Training for Public Filers

Generally, live training must be provided each calendar year to each employee whose pay is set at Level I or Level II of the Executive Schedule. Live training must also be provided to other employees who are required to file public financial disclosure reports every other year, with interactive training provided in the intervening years. The training presentation, whether live or interactive, must focus on government ethics laws and regulations that the DAEO deems appropriate and must address financial conflicts of interest, impartiality, misuse of position, and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.²⁰

According to the ADAEO, he personally delivered the live annual ethics training to each PAS and PA appointee in 2024. The live training consisted of discussions on the topics of post government employment, financial conflicts of interest, impartiality, misuse of position, and gifts. To satisfy the live training requirement, for non-PAS/PA public filers in 2024, the DO Ethics Office delivered a live 2024 annual ethics training presentation to career and non-career employees.

OGE examined the training materials and determined they met applicable content requirements. OGE also examined the DO Ethics Office's 2024 training completion records and confirmed that the non-political public filers whose reports OGE examined during its evaluation of the public financial disclosure system received the required annual ethics training in 2024.

Annual Ethics Training for Confidential Filers and Certain other Employees

Generally, interactive training must be provided each calendar year to employees who are required to file a confidential financial disclosure report pursuant to 5 C.F.R. § 2634.904; employees appointed by the President and employees of the Executive Office of the President; contracting officers; and, other employees designated by the head of the agency. The training presentation must focus on government ethics laws and regulations that the DAEO deems appropriate and must address financial conflicts of interest, impartiality, misuse of position, and gifts. In addition to the training presentation, the agency must provide the employee with either written copies of or written instructions for accessing: the summary of the Standards of Conduct distributed by OGE or an equivalent summary prepared by the agency; provisions of the agency's supplemental regulations or a summary thereof, as determined appropriate by the DAEO; and, instructions for contacting the agency's ethics office.²¹

According to the DO Ethics Office, confidential filers receive web-based interactive annual training in Treasury's Integrated Talent Management System (ITM) as well as written materials. OGE reviewed the annual training presentation combined with the written materials and determined that together they met applicable content requirements. OGE also evaluated

²⁰ See 5 C.F.R. § 2638.308.

²¹ See 5 C.F.R. § 2638.307.

Treasury's 2024 training completion records and verified that the employees whose confidential financial disclosure report OGE examined as part of this review received the required training.

Additional Ethics Outreach Efforts

In addition to conducting the requisite initial and annual ethics trainings for covered employees, Treasury's DO Ethics Office offers continuous learning opportunities throughout the year. Some of these training opportunities in 2024 included:

- Global emails with ethics newsletters and electronic guidance on the Hatch Act and on holiday gifts. According to Treasury ethics officials, there is an influx of questions following the transmission of these emails, indicating that people read this guidance and that it is effective.
- Training for new ethics officials, meeting with them about establishing their ethics program, and sharing templates, best practices, recommendations, and advice.
- Periodic Treasury ethics officials' meeting to discuss timely issues such as virtual currency, financial conflicts, meeting annual training requirements, best practices, and other pertinent ethics topics.

Ethics Counseling

The DAEO, acting directly or through other officials, is responsible for providing advice and counsel to prospective and current employees regarding government ethics laws and regulations, and providing former employees with advice and counsel regarding post-employment restrictions applicable to them.²² A robust ethics counseling program is necessary to ensure that employees receive the guidance they need to comply with the ethics rules.

Treasury ethics attorneys provided over 2,000 pieces of advice to employees recorded in the DO Ethics Database in 2024. OGE reviewed a sample of this advice, which addressed financial conflicts of interest, gifts, conflict remedies, and outside activities. OGE found the counseling to be consistent with applicable statutes and regulations.

Agency-Specific Ethics Rules

An agency may modify or supplement the Standards of Conduct, with the concurrence of OGE, to meet the particular needs of that agency.²³ A supplemental standards of conduct regulation is issued jointly by the agency and OGE and is published in title 5 of the Code of Federal Regulations.

Treasury's supplemental standards of conduct regulation requires that all Treasury employees receive prior written approval before engaging in any outside employment or business

²² See 5 C.F.R. § 2638.104 (c)(4).

²³ See Executive Order 12674 and 5 C.F.R. § 2635.105.

activities, unless an exemption is issued. In addition, Treasury Legal Division attorneys are prohibited from engaging in the outside practice of law that would require the attorney to: (1) take a position that is or appears to be in conflict with the interests of Treasury; or (2) interpret any statute, regulation, or rule administered or issued by Treasury.

To evaluate the administration of Treasury’s supplemental regulations, OGE reviewed the outside activities reported on the sample of public and confidential financial disclosure reports. OGE examined the reports to determine whether proper approvals existed for the reported activities. OGE identified 23 instances of outside employment or activities disclosed in the sample of reports. In each of the 23 instances OGE determined either that the filer had received appropriate approvals or the reported outside activities were exempt from the approval requirement based on internal departmental guidance. Additionally, OGE did not find any instances of the outside practice of law prohibited by Treasury’s supplemental regulation.

Conflict Remedies

The primary criminal conflict of interest law prohibits an employee from participating in an official capacity in a particular matter in which he or she has a financial interest.²⁴ Congress included two provisions that permit an agency to issue a waiver of this prohibition in individual cases. Agencies must consult with OGE, where practicable, prior to issuing such a waiver.²⁵ Treasury issued five waivers in 2024 and OGE was consulted on four of the waivers. Treasury mistakenly issued one waiver without prior consultation with OGE. According to the original waiver letter the sentence “The Office of Government Ethics (OGE) has been consulted and provided a copy of this waiver, and does not object to its issuance.” During the plenary review, OGE evaluated this waiver and OGE would not have objected to the issuance of the waiver.

Additionally, the Ethics in Government Act expressly recognizes the need for PAS nominees to address actual or apparent conflicts of interest by requiring written notice of the specific actions to be taken in order to alleviate the conflict of interest.²⁶ This written notice is commonly known as an “ethics agreement.” In 2024, no PAS officials entered into an ethics agreement.

Enforcement

Executive branch offices are required to notify OGE when they refer a potential violation of a conflict-of-interest law to the Department of Justice (DOJ).²⁷ Treasury’s Office of Inspector General (OIG) is responsible for referring potential violations of the criminal conflict of interest statutes to DOJ and concurrently notifying OGE of the referral. According to Treasury’s response to OGE’s 2024 Annual Questionnaire, the department made one referral to DOJ involving a DO employee, which was declined for prosecution. OGE was concurrently notified of the referral.

²⁴ See 18 U.S.C. § 208.

²⁵ See Executive Order 12674.

²⁶ See 5 U.S.C. app. § 110.

²⁷ See 5 C.F.R. § 2638.206.

Special Government Employees

A special government employee (SGE) is an officer or employee of the executive or legislative branch retained, designated, appointed, or employed to perform official duties, full-time or intermittently, for not more than 130 days in any 365-day period. SGEs are required to file financial disclosure reports and receive ethics training.²⁸

Treasury DO had two committees of SGEs in 2024. In order to evaluate the ethics services provided to SGEs, OGE reviewed the financial disclosure and ethics training services provided to one of these committees, the Climate-Related Financial Risk Advisory Committee (CFRAC), in 2024.

Financial Disclosure

CFRAC included six SGE members in 2024. The members are required to file confidential financial disclosure reports (OGE Form 450). OGE examined the six reports filed by members in 2024, and determined that all were filed and certified timely.

Ethics Training

In 2024, CFRAC SGE members received by email an annual ethics training slide presentation. Members were to review the slides and consider their response to multiple choice questions. Members acknowledged completion of ethics training to the Ethics Program Manager in an email by the end of the year. OGE determined that the training met the applicable content and format requirements. OGE also determined that the SGE members received the required ethics training timely in 2024.

²⁸ See 18 U.S.C. § 202(a).