

ETHICS PROGRAM INSPECTION REPORT

Agency: Federal Permitting Improvement Steering Council (Permitting Council)

Report No.: 25-89I

Date: September 10, 2025

Period Covered by Review: January 1, 2024 through December 31, 2024

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

1.0	AGENCY DATA	
	EMPLOYEES	
1.1	Number of full-time agency employees.	22
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	See comment below
1.3	Number of non-PAS public financial disclosure reports required to be filed.	8
1.4	Number of confidential financial disclosure reports required to be filed.	2
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	See comment below
1.6	Grade level of DAEO.	See comment below
1.7	Title of Alternate DAEO (ADAEO).	Deputy General Counsel
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Deputy General Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	GS-15
1.11	Current number of full-time ethics officials.	1
1.12	Current number of part-time ethics officials.	0
1.13	Number of reporting levels between the DAEO and the agency head.	1
	COMMENTS	
	<p>(1.1) The Permitting Council does not have any PAS officials required to file a public financial disclosure report. The agency is led by an Executive Director, who is a Presidential Appointee. The Executive Director's report is reviewed and certified by Permitting Council ethics officials. (see, Public Financial Disclosure below).</p> <p>(1.5 - 1.6) At the time of the OGE inspection, the General Counsel, who also serves as the agency's Designated Agency Ethics Official (DAEO), a position at the GS-15 level, was vacant.</p>	

2.0	LEADERSHIP			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
	COMMENTS			
	<p>(2.1) The former DAEO left the agency in 2024. OGE examined the former DAEO's termination report as part of this inspection (see Public Financial Disclosure below). OGE reminds the ADAEO that once a new DAEO is designated, OGE must be notified using OGE Form 241A, Notification of Designation of Designated Agency Ethics Official.</p>			

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3.0	PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)						
	COMPLIANCE REQUIREMENTS	Yes	No	N/A			
	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"/>			
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).	100%					
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).	N/A					
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).	N/A					
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).	N/A					
	COMMENTS						
	(3.1 – 3.3) During OGE's examination, it was observed that the agency's employee handbook included information about financial disclosure reports. However, OGE found that the procedures outlined in the handbook did not adequately cover the collection, review, evaluation, and public availability of public financial disclosure reports and periodic transaction reports (OGE Form 278 and OGE Form 278-T). Prior to the conclusion of this inspection, the ADAEO established more detailed written procedures for managing the agency's public financial disclosure system, which fully met the requirement for written procedures. As a result, OGE is not making a recommendation for improvement in this area.						
	(3.4) None of the reports OGE examined were subject to a late filing fee during the period covered by the inspection.						
	(3.14 and 3.17) The Permitting Council does not have any PAS officials required to file public financial disclosure reports for their service on the Council.						

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4.0	CONFIDENTIAL FINANCIAL DISCLOSURE			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	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"/>
	DATA ANALYSIS	%		
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).	100%		
4.9	Percentage of sampled reports reviewed within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	100%		
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).	100%		
	COMMENTS			
	<p>(4.1 – 4.2) As with the public system, during OGE's examination, it was observed that the agency's employee handbook included information about financial disclosure reports. However, OGE found that the procedures outlined in the handbook did not adequately cover the collection, review and certification of confidential financial disclosure reports (OGE Form 450). Prior to the conclusion of this inspection, the ADAEO established more detailed written procedures for managing the agency's confidential financial disclosure system, which fully met the requirement for written procedures. As a result, OGE is not making a recommendation for improvement in this area.</p> <p>(4.5) The Permitting Council does not have an OGE-approved alternative confidential financial disclosure system.</p> <p>(4.7– 4.10) The Permitting Council had two positions in 2024 whose incumbents are required to file confidential financial disclosure reports. OGE examined both confidential reports as part of this inspection. This included one new entrant and one annual report. Both reports were filed timely.</p>			

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5.0	NOTICES TO PROSPECTIVE EMPLOYEES			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	Written offers of employment for positions covered by the Standards of Conduct provide: <i>See</i> 5 C.F.R. § 2638.303.			
5.1	<ul style="list-style-type: none">A statement regarding the agency's commitment to government ethics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none">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	<ul style="list-style-type: none">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	<ul style="list-style-type: none">Where applicable, notice of the time frame for completing initial ethics training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none">Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 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"/>
	COMMENTS			
	(5.5) A reference to the financial disclosure requirements was not noted in the notices OGE examined during this inspection. (5.6 – 5.7) At the time of inspection, ethics officials had not established written procedures for issuing notices to prospective employees. Prior to the conclusion of this inspection, the ADAEO established these written procedures which included the requirement that the DAEO review these procedures annually. Therefore, OGE is not making a recommendation for improvement in this area.			

6.0	NOTICES TO NEW SUPERVISORS			
	COMPLIANCE REQUIREMENTS	Yes	No	N/A
	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	<ul style="list-style-type: none">Contact information for the agency's ethics office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none">The text of 5 C.F.R. § 2638.103.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none">A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none">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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
	COMMENTS			
	(6.2 – 6.3) OGE examined a Notice sent to a new supervisor during the inspection and found that it did not include the text of 5 C.F.R. § 2638.103. Additionally, it did not provide a copy of, a hyperlink to, or the address of a website containing the Principles of Ethical Conduct. The ADAEO confirmed that while there was one new supervisor, during this review period, who did not receive written notice, that supervisor, as well as others, received the initial ethics training, which included the information for new supervisors. Subsequent to this review, the ADAEO established a more detailed written procedure for issuing written notices to new supervisors.			

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The ADAEO confirmed that the written notice to new supervisors has been updated to ensure that the Permitting Council fully complies with the new supervisor notice requirement at 5 C.F.R. § 2638.306.

(6.5 – 6.6) At the time of inspection, ethics officials had not established written procedures for issuing notices to new supervisors. Prior to the conclusion of this inspection, the ADAEO established these written procedures which included the requirement that the DAEO review these procedures annually. Therefore, OGE is not making a recommendation for improvement in this area.

7.0 INITIAL ETHICS TRAINING

COMPLIANCE REQUIREMENTS

Yes No N/A

Each new employee of the agency subject to the Standards of Conduct must complete initial ethics training. *See 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 5 C.F.R. § 2638.304(e)(1).</i>	<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 5 C.F.R. § 2638.304(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	The agency has established written procedures for initial ethics training. <i>See 5 C.F.R. § 2638.304(f).</i>	<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 5 C.F.R. § 2638.304(f).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DATA ANALYSIS		%		
7.5	Percentage of new employees who received initial ethics training. <i>See 5 C.F.R. § 2638.304.</i>	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. <i>See 5 C.F.R. § 2638.304(b).</i>	100%		

COMMENTS

(7.3 - 7.4) During OGE's examination, it was observed that the agency's employee handbook included information about initial ethics training. However, OGE did not find these procedures outlined in the handbook to fully meet the requirements of 5 C.F.R. § 2638.304(f). For example, OGE did not find these procedures to include the requirement that the DAEO review these procedures annually. Prior to the conclusion of this inspection, the ADAEO established more detailed written procedures regarding the agency's initial ethics training program which included the requirement that the DAEO review these procedures annually. As a result, OGE is not making a recommendation for improvement in this area.

8.0 ANNUAL ETHICS TRAINING

COMPLIANCE REQUIREMENTS

Yes No N/A

Each calendar year, public filers, confidential filers, and certain other employees must complete ethics training which meets specified requirements. *See 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 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).</i>	<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 5 C.F.R. § 2638.304(e)(2).</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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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"/>		
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
DATA ANALYSIS		Training Format				
		Live	Interactive			
	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).	N/A	N/A			
8.7	• Other PAS and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(2).	100%	N/A			
8.8	• SES and Equivalent. <i>See</i> 5 C.F.R. § 2638.308(e)(3).	100%	N/A			
	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).	100%	N/A			
8.10	• Employees appointed by the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A			
8.11	• Employees of the Executive Office of the President. <i>See</i> 5 C.F.R. § 2638.307(a)(2).	N/A	N/A			
8.12	• Contracting officers described in 41 U.S.C. § 2101. <i>See</i> 5 C.F.R. § 2638.307(a)(3).	N/A	N/A			
8.13	• Other employees designated by the head of the agency. <i>See</i> 5 C.F.R. § 2638.307(a)(4).	N/A	N/A			
COMMENTS						
	(8.6) The Permitting Council does not have any Executive Schedule Level I or Level II employees.					
	(8.10 – 8.13) The Permitting Council had no employees in these categories.					

9.0	ETHICS ADVICE AND COUNSELING
	COMPLIANCE REQUIREMENT
	Yes No N/A
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).
	COMMENTS
	None

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10.1	Number of SGEs serving on Advisory Committees and Boards.	N/A
	DATA ANALYSIS	%
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See</i> 5 C.F.R. § 2634.903(b).	N/A
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).	N/A
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See</i> 5 C.F.R. § 2634.605(a).	N/A

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	DATA ANALYSIS	%		
10.7	Percentage of SGEs who received initial ethics training. <i>See</i> 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. <i>See</i> 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. <i>See</i> 5 C.F.R. § 2638.307(d)(2).	N/A		

COMMENTS

(10.1-10.9) During the period of inspection the Permitting Council did not have any SGEs serving on advisory committees or boards.

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ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
3.1 - 3.3	<p><u>ISSUE:</u> Written procedures for administering the Permitting Council's public financial disclosure system did not fully address the collection and responsibility for the review and certification of public reports and the process for making these reports publicly available.</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, the ADAEO updated its written procedures for administering the agency's public financial disclosure system to fully satisfy the written procedure requirement.</p>
4.1- 4.2	<p><u>ISSUE:</u> Written procedures for administering the Permitting Council's confidential financial disclosure system did not fully address the collection and responsibility for the review and certification of confidential reports.</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, the ADAEO updated its written procedures for administering the agency's confidential financial disclosure system to fully satisfy the written procedure requirement.</p>
5.6 – 5.7	<p><u>ISSUE:</u> Written procedures for issuing notices to prospective employees had not been established as required by 5 C.F.R. § 2638.303(c)</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, the ADAEO established written procedures for issuing notices to prospective employees, which included the requirement that the DAEO review these procedures annually, as mandated by 5 C.F.R. § 2638.303(c).</p>
6.2 - 6.3	<p><u>ISSUE:</u> The written notice to new supervisors did not fully comply with the new supervisor notice requirement at 5 C.F.R. § 2638.306.</p> <p><u>AGENCY RESPONSE:</u> While there was one new supervisor, during this review period, who did not receive written notice, that supervisor, as well as others, received the initial ethics training, which included the information for new supervisors. Subsequent to this review, the agency has established a more detailed written procedure for issuing written notices to new supervisors. The ADAEO confirmed that the written notice to new supervisors has been updated to ensure that the Permitting Council fully complies with the new supervisor notice requirement at 5 C.F.R. § 2638.306.</p>
6.5 – 6.6	<p><u>ISSUE:</u> Written procedures for issuing notices to new supervisors had not been established as required by 5 C.F.R. § 2638.306(d).</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, the ADAEO established written procedures for issuing notices to new supervisors, which included the requirement that the DAEO review these procedures annually, as required by 5 C.F.R. § 2638.306(b).</p>
7.3 - 7.4	<p><u>ISSUE:</u> Written procedures for initial ethics training were updated to include the requirement that the DAEO review these procedures annually.</p> <p><u>AGENCY RESPONSE:</u> Prior to the conclusion of this inspection, the ADAEO established more detailed written procedures to include the requirement that the DAEO review these procedures annually, as required by 5 C.F.R. § 2638.304(f).</p>