

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: Department of Homeland Security (DHS)

Follow-up to OGE Report Number: 25-77

Report No.: 26-58IF

Date: September 29, 2026

**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 Homeland Security (DHS) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its August 2025 review report. OGE conducted a follow-up review to assess whether DHS has taken sufficient action to resolve the deficiencies underlying Recommendations 3 and 4. The results of the follow-up review are summarized below. OGE will conduct a second follow-up review to assess Recommendations 1 and 2.

	Recommendation	Agency Action and OGE Finding	Status
3	Ensure all newly appointed DPIAC SGE members submit a financial disclosure report within 30 days of appointment or before their first council meeting (whichever comes first). In addition, ensure all SGE members serving on multiple year terms, annually submit a financial disclosure report as required during the established collection period.	The Data Privacy and Integrity Advisory Committee (DPIAC) held its last meeting in October 2024. DHS ethics officials confirmed that no further committee-related activities occurred during the period between the last meeting and the DPIAC's termination, in February 2025. No further financial disclosure reports have been required since OGE's 2025 Plenary review. OGE is closing this recommendation based on DHS' confirmation that the DPIAC is no longer an active committee; therefore there will be no further reports to assess.	Closed
4	Ensure that all HSAC confidential financial disclosure reports are certified timely.	The Homeland Security Advisory Council's (HSAC) most recent meeting was held in December 2025. Although this committee remains active, DHS ethics officials confirmed that no committee-related activities have occurred in 2026 and there are currently no plans for future meetings into 2027. As a result, no financial disclosure reports have been required since OGE's plenary review in August 2025. DHS ethics officials have reaffirmed with the committee's administrator that confidential reports must be collected before SGE members participate in any future committee meetings and/or committee-related activities. Because any future reports collected in 2027 and beyond will fall within the scope of OGE's upcoming plenary review of the DHS ethics program, this recommendation is closed.	Closed

Based on the results of OGE's follow-up review, Recommendations 3 and 4 are closed.