

## ETHICS PROGRAM INSPECTION REPORT

Agency: Council of Economic Advisors (CEA)

Report No.: 26-431

Date: July 9, 2026

Period Covered by Review: January 1, 2025 through December 31, 2025

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest  
in the Executive Branch

1.0 AGENCY DATA		
<b>EMPLOYEES</b>		
1.1	Number of full-time agency employees.	34
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.	7
1.4	Number of confidential financial disclosure reports required to be filed.	10
<b>ETHICS PROGRAM</b>		
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel & Senior Adviser
1.6	Grade level of DAEO.	Administratively Determined
1.7	Title of Alternate DAEO (ADAEO).	Director of Finance and Administration
1.8	Grade level of ADAEO.	Administratively Determined
1.9	Title of the primary, day-to-day ethics program administrator.	General Counsel & Senior Adviser
1.10	Grade level of the primary, day-to-day ethics program administrator.	Administratively Determined
1.11	Current number of full-time ethics officials.	1
1.12	Current number of part-time ethics officials.	1
1.13	Number of reporting levels between the DAEO and the agency head.	1
<b>COMMENTS</b>		
(1.2) CEA has one PAS position, the CEA Chairman. At the time of OGE's inspection, the Chair position was vacant, and the Vice Chair was serving as the Acting Chairman.		

2.0 LEADERSHIP				
<b>COMPLIANCE REQUIREMENTS</b>		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 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>				
(2.2) In June 2024, the Director of Finance and Administration was appointed as CEA's ADAEO. At the time of OGE's inspection, there was no designation letter for the appointment filed with OGE. CEA ethics officials also did not have a copy in their records. The ADAEO submitted the required OGE Form 241B, signed by the Acting Chairman, during this inspection. As a result, OGE will not issue a recommendation.				

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3.0	PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)		Yes	No	N/A
	<b>COMPLIANCE REQUIREMENTS</b>				
	The agency has written policies and procedures in place governing: <i>See</i> 5 U.S.C. § 13122(d)(1)				
3.1	<ul style="list-style-type: none"> <li>• Collection of public financial disclosure reports.</li> </ul>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	<ul style="list-style-type: none"> <li>• Review/evaluation of public financial disclosure reports.</li> </ul>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	<ul style="list-style-type: none"> <li>• Public availability of public financial disclosure reports.</li> </ul>		<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. <i>See</i> 5 C.F.R. § 2634.704		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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"/>
	<b>DATA ANALYSIS</b>		<b>%</b>		
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).		N/A		
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).		83%		
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).		83%		
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		
	<b>COMMENTS</b>				
	<p>(3.6) OGE found public reports that were beyond the six-year retention period. Unless the reports are related to ongoing investigations, OGE recommends removal of the reports from the Integrity system pursuant to 5 C.F.R. § 2634.603(g)(1).</p> <p>(3.11) During the period of inspection, CEA had no non-PAS termination reports.</p> <p>(3.14 - 3.17) CEA had no PAS annual or termination public reports that were required to be filed during the inspection period.</p> <p><u>Concern</u>            (3.12 – 3.13) OGE examined all six non-PAS public reports submitted during the inspection period, which included five new entrant reports and one annual report. Of the five new entrant reports, four (80%) were reviewed and certified in a timely manner. However, the remaining new entrant report (the DAEO's report) was reviewed and certified more than a year late. The ADAEO indicated that the report was timely submitted but a subsequent administrative or technological issue misrouted the electronic report resulting in the delay.</p>				

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OGE is not issuing a recommendation at this time; however, OGE reminds ethics officials that financial disclosure reports must be reviewed and certified promptly to ensure potential conflicts of interest are identified and resolved. Additionally, public reports must be available to the public within 30 days of receipt. Agency ethics officials are responsible for tracking reports to ensure technological issues do not delay the timely review and certification of public reports. Ethics officials should contact OGE's Integrity Help Desk for technical assistance related to the Integrity system.

### 4.0 CONFIDENTIAL FINANCIAL DISCLOSURE

#### COMPLIANCE REQUIREMENTS

Yes No N/A

The agency has written policies and procedures in place governing: *See* 5 U.S.C. § 13122(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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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).	88%
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

(4.4) OGE did not conduct an independent examination of the confidential system used by CEA, as it did for the public reports in OGE's Integrity e-filing system. However, after discovering that some public reports in the Integrity system exceeded the six-year retention period, OGE followed up with ethics officials and confirmed that no confidential reports were exceeding the retention period.

(4.5) CEA does not have an OGE-approved alternative confidential financial disclosure system.

(4.6) As with the public reports, the DAEO would be aware of new appointments and departures to and from confidential filing positions. The agency had 10 confidential filers during the inspection period.

(4.7) To evaluate the timeliness of filing of new entrant confidential financial disclosure reports, OGE examined all eight new entrant reports submitted during the inspection period. Of these, seven reports (88%) were submitted on time, while one report was submitted late. While OGE is not issuing a recommendation, OGE reminds ethics officials to continue efforts to ensure that all reports are filed timely in future filing cycles.

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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"> <li>A statement regarding the agency's commitment to government ethics.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2	<ul style="list-style-type: none"> <li>Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3	<ul style="list-style-type: none"> <li>Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4	<ul style="list-style-type: none"> <li>Where applicable, notice of the time frame for completing initial ethics training.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5	<ul style="list-style-type: none"> <li>Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.</li> </ul>				<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"/>
COMMENTS							
None							

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"> <li>Contact information for the agency's ethics office.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.2	<ul style="list-style-type: none"> <li>The text of 5 C.F.R. § 2638.103.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.3	<ul style="list-style-type: none"> <li>A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.4	<ul style="list-style-type: none"> <li>Other information the DAEO deems necessary.</li> </ul>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
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							
None							

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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. <i>See 5 C.F.R. § 2638.304.</i>							
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 checked="" 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							
None							

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. <i>See 5 C.F.R. §§ 2638.307 and 2638.308.</i>							
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. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).</i>				<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 5 C.F.R. §§ 2638.307(d) and 2638.308(e).</i>				<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 5 C.F.R. §§ 2638.307(f) and 2638.308(g).</i>				<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 5 C.F.R. § 2638.308(e)(2).</i>				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	DATA ANALYSIS	Training Format	
		Live	Interactive
	Percentage of public filers who completed annual ethics training before the end of the calendar year. <i>See 5 C.F.R. § 2638.308(a).</i>		
8.6	<ul style="list-style-type: none"> <li>Executive Schedule Level I and Level II. <i>See 5 C.F.R. § 2638.308(e)(1).</i></li> </ul>	100%	N/A
8.7	<ul style="list-style-type: none"> <li>Other PAS and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(2).</i></li> </ul>	N/A	N/A
8.8	<ul style="list-style-type: none"> <li>SES and Equivalent. <i>See 5 C.F.R. § 2638.308(e)(3).</i></li> </ul>	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 5 C.F.R. § 2638.307(a).</i>		
8.9	<ul style="list-style-type: none"> <li>Employees required to file an annual confidential financial disclosure report. <i>See 5 C.F.R. § 2638.307(a)(1).</i></li> </ul>	100%	N/A
8.10	<ul style="list-style-type: none"> <li>Employees appointed by the President. <i>See 5 C.F.R. § 2638.307(a)(2).</i></li> </ul>	N/A	N/A
8.11	<ul style="list-style-type: none"> <li>Employees of the Executive Office of the President. <i>See 5 C.F.R. § 2638.307(a)(2).</i></li> </ul>	100%	N/A
8.12	<ul style="list-style-type: none"> <li>Contracting officers described in 41 U.S.C. § 2101. <i>See 5 C.F.R. § 2638.307(a)(3).</i></li> </ul>	N/A	N/A
8.13	<ul style="list-style-type: none"> <li>Other employees designated by the head of the agency. <i>See 5 C.F.R. § 2638.307(a)(4).</i></li> </ul>	100%	N/A
<b>COMMENTS</b>			
(8.7, 8.10, 8.12) CEA did not have any employees in these categories.			
<u>Model Agency Practice</u>			
(8.13) During the inspection period, agency ethics officials required non-filers to receive annual ethics training.			

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 5 C.F.R. § 2638.104(c)(4).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>COMMENTS</b>				
(9.1) CEA did not provide any written ethics counseling during the period covered by the inspection.				

10.0	SPECIAL GOVERNMENT EMPLOYEES (SGE) SERVING ON ADVISORY COMMITTEES AND BOARDS			
Confidential Financial Disclosure				
10.1	Number of SGEs serving on Advisory Committees and Boards.	See comment below		
<b>DATA ANALYSIS</b>		<b>%</b>		
10.2	Percentage of sampled confidential new entrant reports filed timely. <i>See 5 C.F.R. § 2634.903(b).</i>	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 5 C.F.R. § 2634.605(a).</i>	N/A		
10.4	Percentage of sampled reports certified within 60 days of receipt. <i>See 5 C.F.R. § 2634.605(a).</i>	N/A		

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### 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				
(10.0 – 10.9) CEA does not have any special government employees serving on advisory committees and boards.				

### ISSUES IDENTIFIED AND RESOLVED DURING THE INSPECTION

Element	ISSUE
2.2	<u>ISSUE</u> : In June 2024, the Director of Finance and Administration at CEA was appointed as the agency's ADAEO. The required Notification of Designation (OGE Form 241B) was not filed with OGE. Additionally, there was no signed copy of the required form in the agency records. The agency did provide a copy of the OGE Welcome Letter, which was issued when the ADAEO designation occurred in 2024. To comply with the requirement outlined in 5 C.F.R. § 2638.107(a), the ADAEO submitted the OGE Form 241B, signed by CEA's Acting Chairman, to OGE during the inspection.

### RECOMMENDATION

#	Element	RECOMMENDATION	Compliance Due
1	3.6	<u>RECOMMENDATION</u> : Ensure that public reports that are beyond the six-year retention period are destroyed in compliance with 5 C.F.R. § 2634.603(g)(1). <u>AGENCY RESPONSE</u> : Agency will implement this recommendation.	At the time of report issuance