ETHICS PROGRAM INSPECTION REPORT	
Agency: Council of the Inspectors General on Integrity and Efficiency (CIGIE)	
Report No.: 27-03I	Date: November 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	
	EMPLOYEES	
1.1	Number of full-time agency employees.	49
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	0
1.3	Number of non-PAS public financial disclosure reports required to be filed.	10
1.4	Number of confidential financial disclosure reports required to be filed.	48
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	Senior Counsel
1.6	Grade level of DAEO.	Administratively determined
1.7	Title of Alternate DAEO (ADAEO).	Senior Counsel
1.8	Grade level of ADAEO.	Administratively determined
1.9	Title of the primary, day-to-day ethics program administrator.	Senior Counsel
1.10	Grade level of the primary, day-to-day ethics program administrator.	Administratively determined
1.11	Current number of full-time ethics officials.	0
1.12	Current number of part-time ethics officials.	2
1.13	Number of reporting levels between the DAEO and the agency head.	2
	COMMENTS	
	(1.5-1.10) CIGIE's DAEO departed the agency in May 2025. A new DAEO and ADAEO were designated in December 2025. However, this new DAEO departed the agency within 45 days of designation and the current DAEO was then designated in May 2026.	

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. *See* 5 C.F.R. § 2638.107(a).	☒	☐	☐
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. *See* 5 C.F.R. § 2638.107(a).	☒	☐	☐
	COMMENTS			
	None.			

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: *See* 5 U.S.C. § 13122(d)(1)			
3.1	• Collection of public financial disclosure reports.	☒	☐	☐
3.2	• Review/evaluation of public financial disclosure reports.	☒	☐	☐
3.3	• Public availability of public financial disclosure reports.	☒	☐	☐
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. *See* 5 C.F.R. § 2634.704	☐	☐	☒

3.5	Public financial disclosure reports are securely maintained. *See* OGE/GOVT-1.	☒	☐	☐
3.6	Public financial disclosure reports are retained in accordance with the retention requirements. *See* 5 C.F.R. § 2634.603(g)(1).	☒	☐	☐
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. *See* 5 C.F.R. § 2638.105(a)(1).	☒	☐	☐
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. *See* 5 C.F.R. § 2638.105(a)(2).	☒	☐	☐
	DATA ANALYSIS	**%**		
3.9	Percentage of sampled non-PAS new entrant reports filed timely. *See* 5 C.F.R. § 2634.201(b).	100%		
3.10	Percentage of sampled non-PAS annual reports filed timely. *See* 5 C.F.R. § 2634.201(a).	100%		
3.11	Percentage of sampled non-PAS termination reports filed timely. *See* 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. *See* 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. *See* 5 C.F.R. § 2634.605(a).	90%		
3.14	Percentage of sampled PAS annual reports filed timely. *See* 5 C.F.R. § 2634.201(a).	N/A		
3.15	Percentage of sampled PAS termination reports filed timely. *See* 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. *See* 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. *See* 5 C.F.R. § 2634.605(a).	N/A		
	COMMENTS			
	(3.4) CIGIE did not have any reports subject to the late filing fee during the period covered by the inspection. (3.14-3.17) CIGIE did not employ any PAS officials during the period covered by the inspection.			

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.	☒	☐	☐
4.2	• Review/evaluation of confidential financial disclosure reports.	☒	☐	☐
4.3	Confidential financial disclosure reports are securely maintained. *See* OGE/GOVT-2.	☒	☐	☐
4.4	Confidential financial disclosure reports are retained in accordance with the retention requirements. *See* 5 C.F.R. § 2634.604.	☒	☐	☐
4.5	The agency's OGE-approved alternative confidential financial disclosure system complies with plans approved by OGE. *See* 5 C.F.R. § 2634.905.	☐	☐	☒
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. *See* 5 C.F.R. § 2638.105(a)(1).	☒	☐	☐
	DATA ANALYSIS	**%**		

4.7	Percentage of sampled confidential new entrant reports filed timely. *See* 5 C.F.R. § 2634.903(b).	N/A
4.8	Percentage of sampled confidential annual reports filed timely. *See* 5 C.F.R. § 2634.903(a).	86%
4.9	Percentage of sampled reports reviewed within 60 days of receipt. *See* 5 C.F.R. § 2634.605(a).	72%
4.10	Percentage of sampled confidential financial disclosure reports certified within 60 days of receipt. *See* 5 C.F.R. §§ 2634.605(a) and 2634.909(a).	72%
	COMMENTS	
	(4.5) CIGIE did not have an alternative confidential financial disclosure system during the period covered by the inspection. (4.7) CIGIE did not have any new entrant filers during the period covered by the inspection. (4.8-4.10) OGE did not receive 6 of the 50 reports selected for review. Additionally, eight reports that were filed do not appear to have been reviewed or certified. CIGIE's ethics officials explained that the likely cause of such oversight was that the agency was preparing for a potentially permanent closure. OGE stresses the importance of ensuring that all required confidential financial disclosure filings at the agency are properly filed and reviewed timely. See recommendations section below.	

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: *See* 5 C.F.R. § 2638.303.			
5.1	• A statement regarding the agency's commitment to government ethics.	☒	☐	☐
5.2	• Notice that the individual will be subject to the Standards of Conduct and the criminal conflict of interest statutes as an employee.	☒	☐	☐
5.3	• Contact information for an appropriate agency ethics office or an explanation of how to obtain additional information on applicable ethics requirements.	☒	☐	☐
5.4	• Where applicable, notice of the time frame for completing initial ethics training.	☒	☐	☐
5.5	• Where applicable, a statement regarding financial disclosure requirements and an explanation that new entrant reports must be filed within 30 days of appointment.	☒	☐	☐
5.6	The agency has established written procedures for issuing the notice to prospective employees. *See* 5 C.F.R. § 2638.303(c).	☒	☐	☐
5.7	The agency's written procedures are reviewed by the DAEO each year. *See* 5 C.F.R. § 2638.303(c).	☐	☒	☐
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. *See* 5 C.F.R. § 2638.303.	☒	☐	☐
	COMMENTS			
	(5.7) CIGIE's current ethics officials could not verify whether the written procedures for notices to prospective employees were reviewed during 2025. While OGE is not issuing a recommendation on this matter, OGE encourages CIGIE's current ethics officials to conduct annual reviews of the written procedures to ensure that current practices are consistent with established procedures and that established procedures are consistent with statutory and regulatory requirements.			

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: *See* 5 C.F.R. § 2638.306.			
6.1	• Contact information for the agency's ethics office.	☐	☐	☒
6.2	• The text of 5 C.F.R. § 2638.103.	☐	☐	☒

6.3	• A copy of, a hyperlink to, or the address of a Web site containing the Principles of Ethical Conduct.	☐	☐	☒
6.4	• Other information the DAEO deems necessary.	☐	☐	☒
6.5	The agency has established written procedures for supervisory ethics notices. *See* 5 C.F.R. § 2638.306(d).	☒	☐	☐
6.6	The agency's written procedures are reviewed by the DAEO each year. *See* 5 C.F.R. § 2638.306(d).	☐	☒	☐
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. *See* 5 C.F.R. § 2638.306(b).	☒	☐	☐
	COMMENTS			
	(6-1–6.4, 6.7) CIGIE did not hire any new officials in 2025 that were required to receive the new supervisor notice. (6.6) CIGIE's current ethics officials could not verify whether the written procedures for notices to new supervisors were reviewed during 2025. While OGE is not issuing a recommendation on this matter, OGE encourages CIGIE's current ethics officials to conduct annual reviews of the written procedures to ensure that current practices are consistent with established procedures and that established procedures are consistent with statutory and regulatory requirements. (6.7) CIGIE's established procedures for notices to new supervisors are comprehensive and assure that the agency has an effective process for providing new supervisors the required information.			

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. *See* 5 C.F.R. § 2638.304(e)(1).	☒	☐	☐
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. *See* 5 C.F.R. § 2638.304(e)(2).	☐	☒	☐
7.3	The agency has established written procedures for initial ethics training. *See* 5 C.F.R. § 2638.304(f).	☒	☐	☐
7.4	The agency's written procedures are reviewed by the DAEO each year. *See* 5 C.F.R. § 2638.304(f).	☐	☒	☐
	DATA ANALYSIS		**%**	
7.5	Percentage of new employees who received initial ethics training. *See* 5 C.F.R. § 2638.304.		0%	
7.6	Percentage of new employees who received initial ethics training within three months of appointment. *See* 5 C.F.R. § 2638.304(b).		0%	
	COMMENTS			
	(7.2) OGE could not verify whether employees who received initial ethics training also received the required written materials or instructions on accessing the materials. (7.4) CIGIE's current ethics officials could not verify whether the written procedures for initial ethics training were reviewed during 2025. While OGE is not issuing a recommendation on this matter, OGE encourages CIGIE's current ethics officials to conduct annual reviews of the written procedures to ensure that current practices are consistent with established procedures and that established procedures are consistent with statutory and regulatory requirements. (7.5-7.6) CIGIE hired one official in November 2025. However the official did not receive initial ethics training.			

ETHICS PROGRAM INSPECTION REPORT	
Agency: Council of the Inspectors General on Integrity and Efficiency (CIGIE)	
Report No.: 27-03I	Date: November 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

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. *See* 5 C.F.R. §§ 2638.307(e)(1) and 2638.308(f)(1).	☒	☐	☐
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. *See* 5 C.F.R. § 2638.308(f)(2) and 5 C.F.R. § 2638.307(e)(2).	☐	☒	☐
8.3	The agency's annual ethics training complies with the formatting requirements for public filers, confidential filers, and certain other employees. *See* 5 C.F.R. §§ 2638.307(d) and 2638.308(e).	☒	☐	☐
8.4	The agency's program for annual ethics training complies with the tracking requirements for public filers, confidential filers, and certain other employees. *See* 5 C.F.R. §§ 2638.307(f) and 2638.308(g).	☒	☐	☐
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. *See* 5 C.F.R. § 2638.308(e)(2).	☐	☐	☒

	DATA ANALYSIS	**Training Format**	
		Live	**Interactive**
	Percentage of public filers who completed annual ethics training before the end of the calendar year. *See* 5 C.F.R. § 2638.308(a).		
8.6	• Executive Schedule Level I and Level II. *See* 5 C.F.R. § 2638.308(e)(1).	N/A	N/A
8.7	• Other PAS and Equivalent. *See* 5 C.F.R. § 2638.308(e)(2).	N/A	N/A
8.8	• SES and Equivalent. *See* 5 C.F.R. § 2638.308(e)(3).	100%	
	Percentage of confidential filers and certain other employees who completed annual ethics training before the end of the calendar year. *See* 5 C.F.R. § 2638.307(a).		
8.9	• Employees required to file an annual confidential financial disclosure report. *See* 5 C.F.R. § 2638.307(a)(1).	100%	
8.10	• Employees appointed by the President. *See* 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.11	• Employees of the Executive Office of the President. *See* 5 C.F.R. § 2638.307(a)(2).	N/A	N/A
8.12	• Contracting officers described in 41 U.S.C. § 2101. *See* 5 C.F.R. § 2638.307(a)(3).	N/A	N/A
8.13	• Other employees designated by the head of the agency. *See* 5 C.F.R. § 2638.307(a)(4).	N/A	N/A
	COMMENTS		
	(8.2) OGE could not verify whether employees who received initial ethics training also received the required written materials or instructions on accessing the materials. (8.5-8.7, 8.10-8.13) CIGIE did not employ any officials under these categories during the period covered by the inspection.		

ETHICS PROGRAM INSPECTION REPORT	
Agency: Council of the Inspectors General on Integrity and Efficiency (CIGIE)	
Report No.: 27-03I	Date: November 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

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. *See* 5 C.F.R. § 2638.104(c)(4).	☒	☐	☐
	COMMENTS			
	None.			

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.	0		
	DATA ANALYSIS	**%**		
10.2	Percentage of sampled confidential new entrant reports filed timely. *See* 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. *See* 5 C.F.R. § 2634.605(a).	N/A		
10.4	Percentage of sampled reports certified within 60 days of receipt. *See* 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. *See* 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. *See* 5 C.F.R. § 2638.304(e)(1).	☐	☐	☒
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. *See* 5 C.F.R. § 2638.304(e)(2).	☐	☐	☒
	DATA ANALYSIS	**%**		
10.7	Percentage of SGEs who received initial ethics training. *See* 5 C.F.R. § 2638.304.	N/A		
10.8	Percentage of SGEs who received initial ethics training timely. *See* 5 C.F.R. § 2638.304(b)(2).	N/A		
10.9	Percentage of SGEs who received annual ethics training. *See* 5 C.F.R. § 2638.307(d)(2).	N/A		
	COMMENTS			
	(10.1-10.9) CIGIE did not employ any SGEs during the period covered by the inspection.			

	RECOMMENDATIONS		
#	**Element**	**RECOMMENDATION**	**Compliance Due**
1	4.8	RECOMMENDATION: Ensure that all required confidential financial disclosure reports are filed.	April 30, 2027

		AGENCY RESPONSE: CIGIE is actively reviewing its procedures to ensure financial disclosure reports are timely filed.	
2	4.9, 4.10	RECOMMENDATION: Ensure that agency confidential reports are certified timely. AGENCY RESPONSE: CIGIE is actively reviewing its procedures to ensure all confidential reports are certified timely.	April 30, 2027
3	5.7, 6.6, 7.4	RECOMMENDATION: Ensure that the written procedures for issuing notices to prospective new employees, notices to new supervisors, and for initial ethics training are reviewed by the DAEO annually. AGENCY RESPONSE: CIGIE will ensure these written procedures are reviewed by the DAEO annually.	April 30, 2027
4	7.5, 7.6	RECOMMENDATION: Provide initial ethics training to all new employees. AGENCY RESPONSE: CIGIE will review and update procedures to ensure that all new employees receive initial ethics training.	April 30, 2027
5	7.2, 8.2	RECOMMENDATION: Provide the required written materials when rendering initial ethics training and annual ethics training. AGENCY RESPONSE: CIGIE will review and update procedures to ensure that the required written materials are provided during initial and annual ethics training.	April 30, 2027