

ETHICS PROGRAM REVIEW FOLLOW-UP REPORT

Agency: United States Department of Agriculture

Follow-up to OGE Report Number: 25-46

Report No.: 26-28I

Date: 5/12/2026

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 Agriculture (USDA) ethics program, the Office of Government Ethics (OGE) issued three recommendations in its March 2025 review report. OGE conducted a follow-up review to assess whether the USDA has taken sufficient action to resolve the deficiencies underlying these recommendations. The results of the follow-up review are summarized below.

	Recommendation	Agency Action and OGE Finding	Status
1	Ensure that public financial disclosure reports are certified timely.	During the 2025 review, OGE found that USDA had certified 68% of sampled reports timely. OGE examined a sample of 20 public financial disclosure reports and found that 90% were certified timely.	Closed
2	Ensure that all SGEs file their confidential financial disclosure reports no later than the first committee meeting they attend or before providing advice to the agency, as required by 5 C.F.R. § 2634.903(b)(3).	During the 2025 review, OGE found that 46% of sampled SGE confidential financial disclosure reports were filed timely. The original advisory committees reviewed in the 2025 report have since been terminated and have not met again. OGE examined another advisory committee and found that 100% of SGEs filed confidential financial disclosure reports timely.	Closed
3	Ensure that SGE confidential financial disclosure reports are certified timely.	During the 2025 review, OGE found that 38% of sampled SGE confidential financial disclosures were certified timely. During the follow-up, OGE found that 100% of sampled SGE confidential financial disclosure reports were certified timely, before the advisory committee's first meeting of the calendar year.	Closed

Based on the results of OGE's follow-up review, all recommendations are closed.