ETHICS PROGRAM INSPECTION REPORT	
Agency: Office of Management and Budget (OMB)	
Report No.: 27-02I	Date: November 4, 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.	466
1.2	Number of Presidentially appointed, Senate confirmed (PAS) public financial disclosure reports required to be filed.	8
1.3	Number of non-PAS public financial disclosure reports required to be filed.	196
1.4	Number of confidential financial disclosure reports required to be filed.	502
	ETHICS PROGRAM	
1.5	Title of Designated Agency Ethics Official (DAEO).	General Counsel
1.6	Grade level of DAEO.	SES
1.7	Title of Alternate DAEO (ADAEO).	Assistant General Counsel
1.8	Grade level of ADAEO.	GS-15
1.9	Title of the primary, day-to-day ethics program administrator.	Assistant 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.	2
1.12	Current number of part-time ethics officials.	2
1.13	Number of reporting levels between the DAEO and the agency head.	1
	COMMENTS	
	None.	

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).	84%		
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).	91%		
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).	91%		
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).	100%		
3.16	Percentage of sampled PAS annual and termination reports reviewed within 60 days of receipt. *See* 5 C.F.R. § 2634.605(a).	100%		
3.17	Percentage of sampled PAS annual and termination reports certified within 60 days of receipt. *See* 5 C.F.R. § 2634.605(a).	100%		
	COMMENTS			
	(3.14) No annual PAS reports were required to be filed during 2025.			

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).	75%		
4.8	Percentage of sampled confidential annual reports filed timely. *See* 5 C.F.R. § 2634.903(a).	100%		

ETHICS PROGRAM INSPECTION REPORT	
Agency: Office of Management and Budget (OMB)	
Report No.: 27-02I	Date: November 14, 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

4.9	Percentage of sampled reports reviewed within 60 days of receipt. *See* 5 C.F.R. § 2634.605(a).	95%
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).	95%
	COMMENTS	
	(4.7) Fifteen of twenty (75%) new entrant reports sampled by OGE were filed timely.	

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			
	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: 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			
	None.			

ETHICS PROGRAM INSPECTION REPORT	
Agency: Office of Management and Budget (OMB)	
Report No.: 27-02I	Date: November 14, 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

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.	100%		
7.6	Percentage of new employees who received initial ethics training within three months of appointment. *See* 5 C.F.R. § 2638.304(b).	98%		
	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. *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).	☒	☐	☐

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UNITED STATES OFFICE OF GOVERNMENT ETHICS
Preventing Conflicts of Interest in the Executive Branch

	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).	**96%**	**4%**
	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).	**1%**	**99%**
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		
	(8.6 and 8.7) Employees in these categories received initial ethics training in 2025 which also met annual ethics training requirements. (8.10 – 8.13) OMB is part of the Executive Office of the President (EOP). All EOP employees are required to receive annual ethics training, and this data is captured in 8.8 and 8.9 above.		

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.	2
	DATA ANALYSIS	**%**
10.2	Percentage of sampled confidential new entrant reports filed timely. *See* 5 C.F.R. § 2634.903(b).	100%
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).	100%
10.4	Percentage of sampled reports certified within 60 days of receipt. *See* 5 C.F.R. § 2634.605(a).	50%

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UNITED STATES OFFICE OF GOVERNMENT ETHICS
Preventing Conflicts of Interest in the Executive Branch

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).	100%		
	COMMENTS			
	(10.4) Two SGEs at OMB served on a board; none served on an advisory committee. Both were required to file confidential financial disclosure reports in 2025. One of these two reports was not certified timely (within 60 days of receipt). (10.7 and 10.8) No SGEs were required to receive initial ethics training during the period under review.			

RECOMMENDATIONS

#	Element	RECOMMENDATION	Compliance Due
1	4.7	RECOMMENDATION: Ensure that new entrant confidential financial disclosure reports are filed no later than 30 days after a new employee assumes a position at OMB. AGENCY RESPONSE: OMB acknowledges recommendation.	January 2028
2	10.4	RECOMMENDATION: Ensure that reports filed by SGEs are certified within 60 days of receipt. AGENCY RESPONSE: OMB acknowledges recommendation.	January 2028