

CY
2021

RESULTS FROM THE

> **ANNUAL**

AGENCY ETHICS PROGRAM
QUESTIONNAIRE

A
SNAPSHOT
OF THE EXECUTIVE
BRANCH ETHICS
PROGRAM



U.S. OFFICE OF GOVERNMENT ETHICS <

Contents

Section 1 – Introduction	2
Legal Requirement	2
Topics Covered	2
Changes to the Questionnaire	3
Methodology	3
Agency Response Rate	3
Data Limitations	4
Section 2 – Key Highlights	5
Ethics Officials & Resourcing.....	5
Financial Disclosure	6
Education & Training	8
Advice & Counsel.....	8
Ethics Pledge (Executive Order 13989)	9
Enforcement	11
Section 3 – Compilation of Agency Responses.....	12
Appendix.....	43

Section 1 – Introduction

The United States Office of Government Ethics (OGE) leads and oversees the executive branch ethics program designed to prevent financial conflicts of interest. Every year, each agency within the executive branch is required to submit to OGE a response to the Annual Agency Ethics Program Questionnaire (questionnaire). Each questionnaire response provides a snapshot of that agency’s ethics program. In the aggregate, the responses also provide a picture of the executive branch ethics program as a whole.

OGE uses the questionnaire to conduct oversight of each agency’s ethics program and uses the resulting data to report on the executive branch ethics program to stakeholders, including the public, Congress, and the ethics community. OGE also uses the data to make informed decisions about its priorities and allocation of resources.

This report combines and summarizes the 139 agency responses for calendar year 2021. Individual agency responses are available on OGE’s website in the [Agency Ethics Documents Search Collection](#).

Legal Requirement

Executive branch agencies are required to submit an annual report to OGE pursuant to the Ethics in Government Act of 1978, as amended.¹ OGE collects the required report via the questionnaire.²

Section 4 of Executive Order 13989 requires OGE to provide an annual public report on the administration of the pledge and this order. This document serves as the public report.

Topics Covered

OGE uses the questionnaire to collect information about the following aspects of each agency’s ethics program:

- Ethics Program Resources and Administration
- Ethics Education and Training
- Advice, Counseling, and Remedies
- Financial Disclosure Program Management and Electronic Filing Systems
- Public and Confidential Financial Disclosure
- Enforcement
- Ethics Pledge (contained in Executive Order 13989)
- Special Government Employees

¹ See 5 U.S.C. app. § 402(e)(1).

² See 5 C.F.R. 2638.207.

Changes to the Questionnaire

In the 2021 questionnaire, OGE modified 8 questions and added 3 new questions. Noteworthy changes include the following:

1. Agencies were asked to indicate whether outside entities evaluated their ethics programs, in addition to self-assessments.
2. Agencies were asked about initial ethics briefings for all covered leaders, not just those who are “new” to the agency.
3. Agencies were asked to exclude Special Government Employees who were expected to serve less than 60 days on a board, commission, or committee from the number of employees required to receive initial ethics training because this information is captured in Part 12.
4. Agencies were asked to respond to questions about the requirements of the current Administration’s Ethics Pledge, contained in Executive Order 13989.

OGE also made a variety of non-substantive changes. These changes improved clarity, eliminated ambiguities, and removed outdated response options.

OGE gave advance notice of these changes through its [Program Advisory 21-04](#), which includes a red-line version of the edits.

Methodology

The questionnaire covered agency ethics program activities that occurred in calendar year 2021. OGE provided an advance copy of the questionnaire to every Designated Agency Ethics Official on September 20, 2021. OGE opened the survey on January 3, 2022, and agency responses were due on February 1, 2022.³

OGE allowed only one response per agency; accordingly, each agency’s response reflects the data for the entire agency, including agency components.

OGE used a custom application to collect each agency response. OGE followed up with individual agencies based on a pre-determined set of selection criteria, including large changes from the previous year’s response, internal inconsistencies of responses, and narrative responses that were unclear or incomplete.

Agency Response Rate

For purposes of the questionnaire, the term “agency” refers to every entity that has a Designated Agency Ethics Official (DAEO). Each agency within the executive branch must have a DAEO.⁴ In addition, some entities, such as the Department of Defense (DoD) and the White House, appoint a DAEO to run the ethics program at the individual office or component level. Thus, several offices within the White House and many components

³ See 5 C.F.R. § 2638.207(a).

⁴ See 5 C.F.R. 2638.104(a)

within DoD each have separate DAEOs who manage the ethics program for their respective office or component. OGE treats each of these White House offices and DoD components as distinct ethics programs and requires a separate response to the questionnaire from each.

For the 2021 Calendar year there were 139 agencies. All 139 agencies responded.

Response rate: 100%

Data Limitations

When reviewing this report, it is important to keep in mind the following data limitations:

- OGE does not independently verify the information submitted by each agency. However, based on a set of criteria, OGE reviews agency responses for anomalies and, when necessary, requests clarifications from the agencies. In addition, as part of its oversight function, OGE conducts agency ethics [program reviews](#) as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch. This process includes validation of individual agency ethics program processes and data. Reports summarizing the results of these program reviews are available on OGE's website.
- Agency ethics officials may interpret the questions differently.
- The aggregate number for certain questions may actually be higher than reported, due to the exclusion of classified information.⁵

⁵ Questions 2, 20, 32-35, 39,40,43.

Section 2 – Key Highlights

This section provides key highlights from the aggregated responses of the 139 agencies that responded for calendar year 2021.⁶ The highlights focus on key aspects of the ethics program, including: ethics officials & resourcing; financial disclosure; education and training; advice and counsel; Ethics Pledge (Executive Order 13989); and enforcement.

Ethics Officials & Resourcing

The executive branch ethics program is decentralized and relies on officials in each of the 139 agencies to carry out a compliance program for the employees of their agency.⁷ According to the 2021 questionnaire responses, more than 7,600 employees across the country supported the ethics program either through substantive work, such as reviewing financial disclosures, or through administrative support, such as providing human resources or information technology services.

The Designated Agency Ethics Official (DAEO) is the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE.⁸ The questionnaire responses show that in 2021 **most DAEOs (87%) were career employees**. Although (56%) of DAEOs had spent less than 5 years in their current positions, 68% had 5 or more years of ethics experience. **Seventy-eight percent (78%) of DAEOs spent less than 25% of their time on ethics.** ([See Q3](#))

Of the other employees supporting the ethics program, **11%, or 863 individuals, performed ethics duties close to full time (31 to 40 hours a week)**. The remaining 89% of employees supporting the ethics program worked on ethics anywhere from 1 to 30 hours per week, as part of other responsibilities. Therefore, when accounting for the reported number of hours worked per week by each individual, **2,326 full-time equivalent positions supported the ethics program across the executive branch in 2021.** ([See Q5](#))

Of the 139 reporting agencies, **57 (41%) reported needing more resources**. Agencies most frequently indicated needing additional resources in the area of human capital (53 agencies), followed by technology (41 agencies). ([See Q9](#))

⁶ Percentages represent the aggregate response. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in a 100% for an individual response or 101% when adding separate percentages. When calculating percentages, responses of “not applicable” were not included in the denominator.

⁷ See 5 C.F.R. 2638.104.

⁸ Each agency is required to have a minimum of two ethics officials, the Designated Agency Ethics Official (DAEO) and the Alternate (ADAEO). See 5 C.F.R. 2638.104(a) and (d). Larger agencies may dedicate additional staff to ethics.

Financial Disclosure

Disclosure of personal financial interests – such as assets, liabilities, and outside positions – allows ethics officials to help employees assess when personal interests might conflict with government responsibilities. The timely collection, review, and certification of public and confidential financial disclosures helps to ensure that the government’s business is conducted free from conflicts of interest.

Notification of Filing Status

OGE regulations require coordination between agencies’ human resources (HR) officials and ethics officials.⁹ Specifically, HR officials must notify ethics officials within specified time frames regarding the status of employees as financial disclosure filers. Prompt notification is necessary for timely disclosure and screening for potential conflicts of interest. Most agencies met the time frames ([See Q27](#) and [Q28](#)):

- **97% of agencies** reported that in all or most cases the human resources office(s) **notified the DAEO of appointments to public financial disclosure positions** within the 15-day deadline (111 of 115 agencies to which the requirement applied).
- **90% of agencies** reported that in all or most cases the human resources office(s) **notified the DAEO of appointments to confidential financial disclosure positions** within the 15-day deadline (98 of 109 agencies to which the requirement applied).
- **94% of agencies** reported that in all or most cases the human resources office(s) **notified the DAEO of terminations from public financial disclosure positions** within the 15-day deadline (107 of 114 agencies to which the requirement applied).¹⁰

Filing Compliance

The 2021 questionnaire results demonstrate a high rate of employee compliance with the filing requirements¹¹:

- **More than 99% of those required to file public financial disclosures did so:** 29,012 reports filed out of 29,141 required. ([See Q33](#) and [Q57](#))
- **99% of those required to file confidential financial disclosures did so:** 406,016 reports filed out of 408,353 required. ([See Q39](#) and [Q57](#))

In addition to new entrant, annual, and termination reports, public filers must also report transactions of certain securities as they occur so that ethics officials can evaluate potential

⁹ See 5 C.F.R. 2638.105.

¹⁰ Confidential financial disclosure filers do not file a termination report. See 5 C.F.R. 2634.903(e).

¹¹ For filing requirements, see 5 C.F.R. 2634.201 and 2634.903.

conflicts of interest in close to real time.¹² In 2021, public filers submitted a reported **22,308 periodic transaction reports**. ([See Q35](#))

Timeliness of Review and Certification

Agencies should review reports promptly and must perform a technical review and conflict of interest analysis within 60 days of receiving a report.

- In 2021, agencies reported that they conducted **timely reviews for 94% of the reports certified**. ([See Q34, Q40, and Q58](#))

If no additional information or remedy is required, agencies must also certify the report before the 60-day period expires. However, final certification may necessarily occur later, if the agency needs to seek additional information or to take remedial action.

- In 2021, agencies reported that they **certified 90% of reports within 60 days**. ([See Q34, Q40, and Q58](#))

Public Availability

Transparency plays an essential role in strengthening trust in government. Agencies must make the financial interests of certain high-level officials publicly available.¹³ Without this transparency, the public could not as meaningfully oversee the integrity of its government.

In 2021, agencies reported a total of **3,462 requests for public financial disclosure reports**, exclusive of the ethics documents released by OGE. ([See Q38](#)) In 2021, **OGE processed additional requests** from the public and the news media to inspect **nearly 8,800 documents under the Ethics in Government Act**, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, Ethics Pledge waivers, and other covered records.¹⁴

Technology

Agencies continue to use technology to support their financial disclosure programs. As required by regulation, **all 139 agencies utilized *Integrity*, OGE's executive branch-wide electronic filing system**, for at least some of their public disclosure reports. In addition, 70 agencies reported using other electronic filing systems for other public reports and/or confidential reports. ([See Q30](#))

¹² See 5 C.F.R. 2634.201(f) and 2634.309.

¹³ See 5 C.F.R. 2634.603.

¹⁴ See OGE's Annual Performance Report for FY 2021

([https://www.oge.gov/web/OGE.nsf/0/75C8D490064D2C078525881300624ACD/\\$FILE/OGE%20APR.pdf](https://www.oge.gov/web/OGE.nsf/0/75C8D490064D2C078525881300624ACD/$FILE/OGE%20APR.pdf)).

Education & Training

An agency's ethics education program increases employees' awareness of their ethical obligations, helps them identify ethics issues that may arise in the work they perform, and provides employees with guidance and support for making ethical decisions.

Overall, the results from the questionnaire demonstrate a high rate of employee compliance with the core training requirements ([See Q16, Q17, Q20, and Q56](#))¹⁵:

- **99%** of new Presidentially appointed, Senate-confirmed appointees **timely received their required initial ethics briefing** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).
- **94%** of **new employees timely received their required initial ethics training** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).
- **97%** of public and confidential financial disclosure **filers received their required annual ethics training** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).
- **95%** of **Special Government Employees** who were expected to serve on a board, commission, or committee **received their required initial ethics training** before or at their first meeting.

Forty-seven (47%) of agencies established additional ethics education requirements, beyond the minimum required by regulation. ([See Q21](#))

In addition, **84%** of agencies **reported assessing risk** to determine the content, format, and/or timing of their ethics education, and **83%** of agencies **reported assessing the effectiveness of their education programs**. ([See Q22, and Q23](#))

Advice & Counsel

The analysis and resolution of conflicts of interests are key to agencies and employees managing and minimizing the risk of ethical failure. A thorough analysis is the first step in ensuring that agencies and employees take appropriate steps to remedy a potential conflict of interest. By resolving potential conflicts before they happen, ethics officials help ensure that their agencies' decisions are made in the public's interest and are not unfairly influenced by personal financial interests. In 2021, **employees most frequently sought ethics guidance on: (1) outside employment/activities, (2) financial disclosure reporting and (3) gift acceptance**. ([See Q24](#))

¹⁵ For training requirements, see 5 C.F.R. 2638 Subpart C.

All employees must recuse from government matters that affect the financial interest of someone with whom they are seeking employment.¹⁶ Certain senior employees are also required to notify their ethics official in writing when they begin negotiating for employment with a non-government entity to help ensure that they receive timely advice.¹⁷ In 2021, these **senior officials filed 1,725 notifications regarding negotiations for employment.** ([See Q25](#))

The criminal conflict of interest law at 18 U.S.C. § 208 prohibits an employee from participating in an official capacity in a particular matter in which the employee has a financial interest; however, an agency can issue a waiver of the prohibition in individual cases. In 2021, **agencies issued 80 such waivers to regular employees and 329 such waivers to Special Government Employees serving on federal advisory (FACA) committees.** ([See Q26](#))

Ethics Pledge (Executive Order 13989)

Executive Order 13989 required certain individuals appointed to an executive branch agency on or after January 20, 2021, to sign an Ethics Pledge (“Pledge”). By signing the Pledge, these appointees committed to additional recusal obligations, post-employment restrictions, and a ban on accepting gifts from lobbyists or lobbying organizations.

Compliance with the Ethics Pledge Signature Requirement

Agencies reported that **2,819 full-time, non-career appointees were appointed between January 20, 2021 and December 31, 2021.**¹⁸ Of those appointed, 2,765 were required to sign the Ethics Pledge and 2,764¹⁹ (99.9%) have done so. This number includes forty-seven (47) appointees who should have signed the Ethics Pledge in 2021, but who instead signed in 2022. ([See Q47](#))

Fifty-four (**54**) **appointees were not required to sign** for the following reasons ([See Q47](#)):

- 16 were appointed to an exempt, non-policymaking position;
- 20 were appointed without a break in service after serving in another position for which the Pledge had already been signed; and
- 18 did not sign, per their agency, for “other” reasons including:
 - 1 was appointed at the end of 2021 and was not required to sign the Ethics Pledge until 2022.

¹⁶ See 18 U.S.C. § 208 and 5 C.F.R. 2635.604.

¹⁷ See Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act, Pub. L. No. 112-105 § 17 and 5 C.F.R. 2635.607.

¹⁸ The following advisories, located on OGE’s website, provide detailed guidance regarding the appointees subject to the Ethics Pledge: LA-21-07, LA-21-05, LA-21-07, DO-09-003, DO-09-010, and DO-09-020.

¹⁹ The Council on Environmental Quality reported that “One appointee departed CEQ without signing the pledge. CEQ has revised and improved internal workflows to better track ethics pledge execution.”

- 6 were full-time appointees – one (1) Executive Branch employee and five (5) Senate employees who served for a term of less than 6 months. The agency determined that these employees were not required to sign the Ethics Pledge.
- 11 Presidential appointees who were career civil servants detailed from other federal agencies who were not required to sign the Ethics Pledge (although, per the agency, some did so).

Individuals appointed in a prior administration that stayed on in their position ("holdover appointees") beyond 100 days were required to sign the Ethics Pledge. There were **42 holdovers**. Of those, **28 signed and 14 did not sign** the Ethics Pledge.²⁰ ([See Q48](#))

Revolving Door Ban

Appointees who were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment are required to recuse from certain activities related to their prior lobbying activities. Of the full-time, non-career appointees in 2021, agencies reported that **19 appointees were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior** to their appointment. ([See Q49](#), [Q50](#), and [Q51](#))

Four (4) of the 19 appointees had an ethics agreement addressing their obligations under paragraph 3 of the Ethics Pledge. The remaining 15 did not have an ethics agreement, per their agency, for the following reasons:

- 4 appointees received waivers to Pledge paragraph 3 allowing participation in certain activities related to their prior lobbying activities.
- 10 appointees' duties were determined to be sufficiently unrelated to prior lobbying activities and therefore Pledge paragraph 3 was not reasonably expected to limit participation in any agency matters.
- 1 appointee's agency, in accordance with their procedures, confirmed that the appointee did not need a waiver of Paragraph 3 of the Ethics Pledge and the agency provided extensive written legal advice to the appointee concerning participation restrictions under the pledge.

Ethics Pledge Waivers

Section 1 of the Executive Order requires all covered appointees to abide by several commitments in the Ethics Pledge, unless they are granted a waiver under section 3. With the approval of the White House, the Acting Director of the Office of Management and Budget (OMB) designated the Designated Agency Ethics Official as the position of each

²⁰ Agencies were required to provide a reason for why a "holdover" did not sign the Ethics Pledge. See Q48c in the summary report and in individual agency responses.

executive agency to exercise section 3 waiver authority after consultation with the Counsel to the President.²¹ In 2021, **11 agencies granted waivers to 17 individuals.**

Twelve (12) of those waivers waived paragraph 2 of the Ethics Pledge. Generally, paragraph 2, of the Ethics Pledge restricts an appointee's participation in particular matters involving specific parties in which the appointee's former employers or clients have an interest. **Seven (7) of those waivers waived paragraph 3** of the Ethics Pledge. Generally, paragraph 3 of the Ethics Pledge restricts an appointee from seeking or accepting employment with an executive agency that the appointee lobbied within the two years prior to appointment. ([See Q52](#))

Pledge Enforcement

One (1) agency reported two (2) **violations of the Pledge.** In both cases the agency consulted with the White House and the appointees were provided counseling. ([See Q53](#), and [Q54](#))

Enforcement

Each agency is responsible for investigating and taking action against an employee who potentially has violated an ethics rule or law.²² Agencies may take corrective or disciplinary action under applicable Government-wide regulations or agency procedures. If misconduct is potentially criminal, the agency must refer the matter to the Department of Justice.

Thirty-two (32) agencies reported taking **633 disciplinary actions based wholly or in part upon violations of the Standards of Conduct** (multiple actions could be taken against one individual). **The largest share of disciplinary actions (46%) involved violations of the regulation regarding misuse of position.** ([See Q42](#))

Eleven (11) agencies reported taking **18 disciplinary actions** based wholly or in part upon **violations of criminal or civil statutes** (multiple actions could be taken against one individual). **Two-thirds (67%) of those actions were for violations of the primary criminal conflict of interest statute, 18 U.S.C. § 208,** which prohibits employees from taking official action that can affect a personal financial interest. ([See Q43](#))

Twenty-five (25) agencies reported a total of **55 referrals to the Department of Justice** concerning potential violations of the criminal conflict of interest statutes. ([See Q44](#))

²¹ LA-21-04

²² See 5 C.F.R 2638.107(d).

Section 3 – Compilation of Agency Responses

For each question, the **bold** number is the aggregated response for all 139 agencies that responded to the questionnaire. In parentheses is the percentage that the aggregated response represents. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in a 100% for an individual response or 101% when adding separate percentages. When calculating percentages, responses of “not applicable” were not included in the denominator.

**United States
Office of Government Ethics**

2021 AGENCY ETHICS PROGRAM QUESTIONNAIRE

PART 4. PROGRAM RESOURCES AND ADMINISTRATION

1. Agency: _____ **139**
2. Number of full-time agency employees as of December 31, 2021: _____
3,569,208
3. Information about the Designated Agency Ethics Official (DAEO):

a. Vacant (as of December 31, 2021)?	<input type="checkbox"/> Yes (<i>skip to #4a</i>) 5 (4%) <input type="checkbox"/> No 134 (96%)
b. Time in current DAEO position	<input type="checkbox"/> Less than 1 year 29 (22%) <input type="checkbox"/> 1-4 years 46 (34%) <input type="checkbox"/> 5-9 years 33 (25%) <input type="checkbox"/> 10 or more years 26 (19%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 9 (7%) <input type="checkbox"/> 1-4 years 34 (25%) <input type="checkbox"/> 5-9 years 21 (16%) <input type="checkbox"/> 10 or more years 70 (52%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 105 (78%) <input type="checkbox"/> 26-50% 15 (11%) <input type="checkbox"/> 51-75% 5 (4%) <input type="checkbox"/> 76-100% 9 (7%)
e. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 117 (87%) <input type="checkbox"/> political appointee 17 (13%)

f. Number of reporting levels between the DAEO and the agency head.	<input type="checkbox"/> 0 (the agency head is the DAEO) 1 (1%) <input type="checkbox"/> 1 105 (78%) <input type="checkbox"/> 2 24 (18%) <input type="checkbox"/> 3 4 (3%) <input type="checkbox"/> 4 or more 0 (4%)
---------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

a. Vacant (as of December 31, 2021)?	<input type="checkbox"/> Yes (<i>skip to #5</i>) 8 (6%) <input type="checkbox"/> No 131 (94%)
b. Time in current ADAEO position	<input type="checkbox"/> Less than 1 year 28 (21%) <input type="checkbox"/> 1-4 years 60 (46%) <input type="checkbox"/> 5-9 years 27 (21%) <input type="checkbox"/> 10 or more years 16 (12%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 9 (7%) <input type="checkbox"/> 1-4 years 33 (25%) <input type="checkbox"/> 5-9 years 32 (24%) <input type="checkbox"/> 10 or more years 57 (44%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 65 (50%) <input type="checkbox"/> 26-50% 20 (15%) <input type="checkbox"/> 51-75% 7 (5%) <input type="checkbox"/> 76-100% 39 (30%)
e. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 125 (95%) <input type="checkbox"/> political appointee 6 (5%)

5. Number of employees, including the DAEO and ADAEO, who performed ethics program duties in 2021 (e.g., financial disclosure, education and training, advice and counseling, and program administration).

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area	773	744	202	107	628	2,454
b. Outside the D.C. Metro area	1,675	2,627	548	139	235	5,224

TOTAL	2,448	3,371	750	246	863	7,678
-------	--------------	--------------	------------	------------	------------	--------------

*FTE = Full Time Equivalent

Example: The table below provides an example of an agency with 13 employees that performed ethics program duties in 2021.

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area	1	0	2	2	1	6
b. Outside the D.C. Metro area	1	3	3	0	0	7
TOTAL	2	3	5	2	1	13

6. In what areas did contractors support the ethics program? Select all that apply.

- Not applicable (no contractors supported the ethics program) **89**
- IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.) **45**
Please describe the IT support (optional): _____
- Administrative support (e.g., tracking filing or training requirements, sending reminders, data entry, etc.) **18**
Please describe the administrative support (optional): _____
- Substantive ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.) **8**
Please describe the substantive support (optional): _____
- Other (please describe) **3** [See Question 6 Table 1](#)

7. Did your agency **receive** ethics services or support from another federal agency or federal entity? Do not include contractors, OGE support, or OMB support of MAX.gov.

- Yes **28** (20%)
Please provide the name(s) of the federal agency or entity: _____
Describe the services or support received: _____
- No **111** (80%)

[See Question 7 Table 1](#)

8. Did your agency **provide** ethics program services or support for any board, commission, or agency that is independent of your agency?

Yes **20** (14%)

Please provide the name(s) of the board, commission, or agency: _____

Describe the services or support provided: _____

No **119** (86%)

[See Question 8 Table 1](#)

9. Does your agency's ethics program need additional resources? Check all that apply.

No additional resources needed **82**

Human Capital **53**

Technology **41**

Other (specify) _____ **9** [See Question 9 Table 1](#)

10. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2021?

Yes **89** (66%)

No **45** (34%)

Not applicable (specify why) _____ **5**²³ [See Question 10 Table 1](#)

11. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) or any entity outside of your agency (e.g., GAO or private auditing firm) evaluate any aspect of the ethics program in 2021 (5 C.F.R. 2638.104(c)(16))? **Exclude** program reviews conducted by OGE. Select all that apply.

My agency (e.g., ethics office, Inspector General, General Counsel, etc.) conducted an evaluation **72** (52%)

An entity outside of my agency, other than OGE, (e.g., GAO or a private auditing firm) conducted an evaluation (please describe _____) **11** (8%)

No evaluation was conducted (*skip to #13*) **60** (43%)

12. What kind of changes resulted from the evaluation?

Programmatic changes (please describe) _____ **51**

Policy changes (please describe) _____ **29**

No changes resulted (specify why not) _____ **13**

²³ The percentage calculations for this question exclude agencies that answered "not applicable."

Not applicable (specify why) _____ **3**

[See Question 12 Table 1](#)

13. Of the following required written procedures, which did you have in place? Check all that apply:

- Financial disclosure program, including for the filing, review, and when applicable, public availability of public financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i)) **136**
- Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. 2638.303) **129**
- Provision of initial ethics training (5 C.F.R. 2638.304) **129**
- Issuance of ethics notice to new supervisors (5 C.F.R. 2638.306) **120**
- None. Explain what steps you are taking to implement the required written procedures: _____ **1** [See Question 13 Table 1](#)

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 4 Table](#)

PART 5. EDUCATION AND TRAINING

14. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. 2638.303, provide the DAEO with the written confirmation required pursuant to 5 C.F.R. 2638.310?
- Written confirmation not required because my agency has less than 1,000 employees **81**²⁴
 - Written confirmation not required because the DAEO's office is responsible for issuing ethics notices to prospective employees **4**
 - All of the offices provided written confirmation to the DAEO (*skip to #16*) **51** (96%)
 - Some of the offices provided written confirmation to the DAEO (explain why not all offices, then skip to #16) _____ **2** (4%)
 - None of the offices provided written confirmation to the DAEO (explain why not all offices, then skip to #16) _____ **0**

[See Question 14 Table 1](#)

15. Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. 2638.303?
- All of the written offers included the required information **64** (91.4%)
 - Some of the written offers included the required information (please explain why not all offers) **3** (4.3%)
 - None of the written offers included the required information (please explain why not all offers) **3** (4.3%)
 - Not applicable because no offers of employment were made **11**²⁵
 - Not applicable for another reason (please explain) _____ **4**

[See Question 15 Table 1](#)

²⁴ The percentage calculations for this question exclude agencies that answered "written confirmation not required..."

²⁵ The percentage calculations for this question exclude agencies that answered "not applicable."

16. Initial Ethics Briefing

a. How many agency leaders, as defined in 5 C.F.R. 2638.305(a), were required to receive ethics briefings by December 31, 2021? Exclude SGEs that were expected to serve less than 60 days on a board, commission, or committee.	290
i. How many new agency leaders received their briefing within 15 days of their appointment?	287
ii. How many new agency leaders received their briefing beyond the 15-day requirement?	3
iii. How many new agency leaders have yet to receive their briefing as of today?	0

If applicable, please explain why some of the leaders received their briefing beyond the 15-day requirement or have yet to receive their briefing. ____ [See Question 16 Table 1](#)

17. Initial Ethics Training

a. How many employees, as defined in 5 C.F.R. 2638.304(a), were required to receive Initial Ethics Training (IET) by December 31, 2021 (5 C.F.R. 2638.304)? Exclude SGEs that were expected to serve less than 60 days on a board, commission, or committee. (Note: Include employees who were not required to receive the interactive portion of the IET, as provided in 5 C.F.R. 2638.304(a)(2).)	337,340
i. How many of those employees received IET within the 3-month requirement?	316,918 (94%)
ii. How many of those employees received IET beyond the 3-month requirement?	10,365 (3%)
iii. How many of those employee have not received IET as of today?	10,057 (3%)

If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET. _____ [See Question 17 Table 1](#)

Example: If an employee started at the agency on December 15, 2021, and the employee completed IET prior to the end of the calendar year, include the employee in your required and received numbers. If, on January 1, 2022, the employee has not completed IET, do not count that employee in your required numbers. Instead, include the employee in your 2022 questionnaire response to be filed in 2023.

18. Did the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required written confirmation to the DAEO, pursuant to 5 C.F.R. 2638.310?

- Written confirmation not required because my agency has less than 1,000 employees **74**²⁶
- Written confirmation not required because all IET was provided by an office under the DAEO’s supervision **42**
- All of the offices provided the written confirmation to the DAEO **22** (96%)
- Some of the offices provided the written confirmation to the DAEO (explain why not all offices) ____ **0**
- None of the offices provided the written confirmation to the DAEO (explain why not all offices) ____ **1** (4%)

[See Question 18 Table 1](#)

19. Did the head of the agency complete either initial ethics training and/or annual ethics training in 2021?

- Yes **131** (99.2%)
- No (specify why) _____ **1** (0.8%)
- Not applicable (specify why) _____ **7**²⁷

[See Question 19 Table 1](#)

20. Required Annual Ethics Training

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)
a. Executive Schedule Level I or Level II public filers (OGE Form 278e)	43	43 (100%)
b. All other public filers (OGE Form 278e)	20,833	19,892 (95%)
c. Confidential filers (OGE Form 450 and OGE-approved alternative confidential financial disclosure forms)	342,892	334,061 (97%)
d. Other employees required by 5 C.F.R. 2638.307(a) (employees appointed by the President; employees of the Executive Office of	34,445	34,234 (99%)

²⁶ The percentage calculations for this question exclude agencies that answered “Written confirmation not required...”

²⁷ The percentage calculations for this question exclude agencies that answered “not applicable.”

the President; contracting officers; or, other employees designated by the head of the agency.)		
TOTAL	398,213	388,230 (97%)

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: _____ [See Question 20 Table 1](#)

21. Did your agency establish additional requirements for the agency's ethics education program, pursuant to 5 C.F.R. 2638.309?:

- My agency established additional training requirements for employees performing ethics duties described in 5 C.F.R. 2638.104-105 (ethics and human resources officials)? Please describe: _____ **9**
- My agency established additional training requirements for other groups of employees, beyond those described in 5 C.F.R. 2638.303-308 (notices to new employees and supervisors, initial ethics training, ethics briefings, annual ethics training)? Please describe: _____ **48**
- My agency established additional training procedures (e.g., certification procedures). See 5 C.F.R. 2638.309(c). Please describe: _____ **8**
- No, my agency did not establish additional training requirements **83**

[See Question 21 Table 1](#)

22. If your agency assessed risk to help inform the content, format, and/or timing of ethics education and communications, select all that apply (see [PA-19-05](#) for reference):

- Reviewed advice logs for common issues **77**
- Discussed upcoming work and agency priorities with senior staff **80**
- Talked to program managers about risks inherent in their work **70**
- Conducted surveys to identify common and emerging ethics risks **18**
- Talked to employees about the ethics concerns they encounter in the workplace. **90**
- Other (please specify) _____ **19** [See Question 22 Table 1](#)
- My agency did not assess risk **22**

23. If your agency evaluated the effectiveness of your ethics education and/or communication, select all that apply (see [PA-19-05](#) for reference):

- Conducted self-assessments to ensure that required employees are receiving Training **88**

- Administered post-training evaluations to assess participants' perceptions of the training **45**
- Reviewed advice logs for increased activity after training presentations and Communications **60**
- Held discussions with agency leaders and employees to evaluate whether the training and communications they received supported them in managing ethics risks **53**
- Other (please describe) _____ **18** [See Question 23 Table 1](#)
- My agency did not evaluate the effectiveness of ethics education **24**

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 5 Table](#)

PART 6. ADVICE, COUNSELING, AND REMEDIES

24. From the list below, select the three topics that your employees most frequently sought guidance on in 2021. Please rate them in order, so that the first topic is the topic on which employees sought guidance the most frequently.

Conflicting financial interests Most frequent topic: 22 agencies Second most frequent topic: 11 agencies Third most frequent topic: 10 agencies This topic was selected a total of 43 times
Gift acceptance Most frequent topic: 20 agencies Second most frequent topic: 19 agencies Third most frequent topic: 25 agencies This topic was selected a total of 64 times
Financial disclosure reporting Most frequent topic: 41 agencies Second most frequent topic: 34 agencies Third most frequent topic: 16 agencies This topic was selected a total of 91 times
Impartiality in performance of official duties Most frequent topic: 4 agencies Second most frequent topic: 11 agencies Third most frequent topic: 10 agencies This topic was selected a total of 25 times
Misuse of position, government resources, and information Most frequent topic: 1 agencies Second most frequent topic: 6 agencies Third most frequent topic: 12 agencies This topic was selected a total of 19 times
Outside employment/activities Most frequent topic: 40 agencies Second most frequent topic: 34 agencies Third most frequent topic: 25 agencies This topic was selected a total of 99 times
Post-employment restrictions Most frequent topic: 9 agencies Second most frequent topic: 20 agencies Third most frequent topic: 27 agencies This topic was selected a total of 56 times
Travel, subsistence, and related expenses from non-federal sources

Most frequent topic: **2** agencies
 Second most frequent topic: **3** agencies
 Third most frequent topic: **8** agencies
 This topic was selected a total of **13** times

Other (specify)
 Most frequent topic: **1** agencies
 Second most frequent topic: **1** agencies
 Third most frequent topic: **6** agencies
 This topic was selected a total of **8** times

25. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2021 (see 5 C.F.R. 2635.602(a)): _____ **1,725**
26. Number of 18 U.S.C. 208 waivers granted in 2021:

	Number Granted in 2021	Number Sent to OGE
a. 208(b)(1) waivers	80	79
b. 208(b)(3) waivers	329	317

If applicable, please explain discrepancies between the number of waivers granted and the number provided to OGE. _____ [See Question 26 Table 1](#)

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 6 Table](#)

PART 7. FINANCIAL DISCLOSURE PROGRAM MANAGEMENT AND ELECTRONIC FILING SYSTEMS

27. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. 2638.105(a)(1))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	72 (63%)	39 (34%)	3 (2%)	1 (1%)	24 ²⁸
b. Confidential Filers	53 (49%)	45 (41%)	8 (8%)	3 (3%)	30 ²⁹

If not applicable, specify why. _____

[See Question 27a Table 1](#)

[See Question 27b Table 1](#)

If “never” or “in some cases,” please explain further: _____

[See Question 27a Table 2](#)

[See Question 27b Table 2](#)

28. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. 2638.105(a)(2))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	72 (63%)	35 (31%)	5 (4%)	2 (2%)	25 ³⁰

If not applicable, specify why. _____

[See Question 28 Table 1](#)

If “never” or “in some cases,” please explain further: _____

[See Question 28 Table 2](#)

²⁸ The percentage calculations for this question exclude agencies that answered “not applicable.”

²⁹ The percentage calculations for this question exclude agencies that answered “not applicable.”

³⁰ The percentage calculations for this question exclude agencies that answered “not applicable.”

29. Which electronic filing system(s) does your agency use?

- Integrity* ONLY (skip to Additional Comments for this Part) **69** (50%)
- Integrity* **and** Other (specify) _____ **70** (50%) [See Question 29 Table 1](#)

30. Indicate for which forms your agency uses the “Other” e-filing system. Check all that apply.

- Public Financial Disclosure (OGE Form 278e)
Provide the name of the other system: _____ **1**
- Periodic Transactions (OGE Form 278-T)
Provide the name of the other system: _____ **13**
- Confidential Financial Disclosure (OGE Form 450 or OGE-approved alternative form)
Provide the name of the other system: _____ **70**

31. Indicate your FY 2021 actual costs for using the e-filing system. *Note:* Because OGE does not charge fees to use *Integrity*, there are no reportable costs associated with the use of *Integrity*.

	Public (do not include <i>Integrity</i>)	Confidential	
a. Amount paid to a non-federal vendor in FY 2021	\$253,129	\$6,571,368	\$6,824,497
b. Amount paid to a federal agency in FY 2021	\$151,000	\$4,016,836	\$4,167,836
c. Amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2021	\$78,001	\$4,215,470	\$4,293,471
Total FY 2021 actual costs	\$482,130	\$14,803,674	\$15,285,804

32. Indicate the number of filers who filed electronically in fiscal year 2021.

	Public (excluding filers in <i>Integrity</i>)	Confidential
Number of financial disclosure filers, not reports, who filed electronically in FY 2021	4,451	340,283

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 7 Table](#)

PART 8. PUBLIC FINANCIAL DISCLOSURE

33. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2021, **excluding** SGEs, and the number of reports actually filed (i.e., received) by December 31, 2021.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	Required		735	1,323	1,067	1,814	4,939
	Filed		732 (99.5%)	1,307 (98.8%)	1,062 (99.5%)	1,800 (99.2%)	4,901 (99.2%)
b. Annual	Required	294	161	9,313	88	9,063	18,919
	Filed	294 (100%)	162 (100%)	9,306 (99.9%)	88 (100%)	9,049 (99.8%)	18,899 (99.9%)
c. Termination	Required	361	713	1,03	1,322	1,166	4,594
	Filed	359 (99.4%)	708 (99.3%)	1,014 (98.2%)	1,305 (98.8%)	1,144 (98.1%)	4,530 (98.6%)
d. Combination ¹	Required	21	32	134	131	173	491
	Filed	21 (100%)	31 (99.3%)	132 (98.5%)	131 (100%)	172 (99.4%)	489 (99.6%)
Total	Required	676	1,641	11,802	2,608	12,216	28,943
	Filed	674 (99.7%)	1,633 (99.5%)	11,759 (99.6%)	2,586 (99.2%)	12,165 (99.6%)	28,817 (99.6%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another category in the chart, etc.

Example for new entrant and termination reports: If an employee joined (or departed) the agency on December 15, 2021, and the employee filed a new entrant (or termination) report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, 2022, the employee has not filed a new entrant (or termination) report, do not count that report in your required numbers. Instead, include the report in your 2022 questionnaire response to be filed in 2023.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. [See Question 33 Table 1](#)

34. Note the number of public financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude** reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605 and section 4.02 of the Public Financial Disclosure Guide.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	How many reports did your agency certify or close in 2021?		675	1,264	973	1,633	4,545
	Of those certified or closed in 2021, how many were initially reviewed within 60 days?		653	1,171	954	1,528	4,306 (95%)
	Of those certified or closed in 2021, how many were certified or closed within 60 days?		510	944	838	1,301	3,593 (79%)
b. Annual	How many reports did your agency certify or close in 2021?	291	160	9,184	97	8,399	18,131
	Of those certified or closed in 2021, how many were initially reviewed within 60 days?	244	151	8,483	94	7,781	16,753 (92%)
	Of those certified or closed in 2021, how many were certified or closed within 60 days?	216	115	7,170	78	6,479	14,058 (78%)
c. Termination	How many reports did your agency	362	724	934	1,320	1,070	4,410

	certify or close in 2021?						
	Of those certified or closed in 2021, how many were initially reviewed within 60 days?	331	706	904	1,286	1,028	4,255 (96%)
	Of those certified or closed in 2021, how many were certified or closed within 60 days?	293	673	830	1,244	956	3,996 (91%)
d. Combination ¹	How many reports did your agency certify or close in 2021?	21	32	134	133	156	476
	Of those certified or closed in 2021, how many were initially reviewed within 60 days?	21	30	128	133	151	463 (97%)
	Of those certified or closed in 2021, how many were certified or closed within 60 days?	18	29	111	120	138	416 (90%)
TOTAL	How many reports did your agency certify or close in 2021?	674	1,591	11,516	2,523	11,258	27,562
	Of those certified or closed in 2021, how many were initially reviewed within 60 days?	596	1,540	10,686	2,467	10,488	25,777 (93%)
	Of those certified or closed in 2021, how many were certified or closed within 60 days?	527	1,327	9,055	2,280	8,874	22,063 (80%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another section, etc.

If applicable, please explain why some reports were reviewed more than 60 days after submission. _____ [See Question 34 Table 1](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought
- remedial action was being taken
- other (specify) _____ [See Question 34 Table 2](#)

35. Number of periodic transaction reports filed, **excluding** those filed by SGEs: _____ **22,308**

Note: Count the total number of periodic transaction reports filed. *Example 1:* If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the table above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12” in the table.

36. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports and periodic transaction reports, **excluding** those for reports filed by SGEs.

	Granted Filing Extension	Granted Waiver of Late Filing Fee	Paid Late Filing Fee
a. Number of OGE Form 278e Reports	3,588	318	70
b. Number of OGE Form 278-T Reports	537	504	128

37. Number of public financial disclosure filers reported in calendar year 2021 to the Attorney General for failure to file: _____ **2**

38. How many requests for public financial disclosure reports did you receive in 2021? Count each OGE Form 201 as one request, even if it contains a request for documents for multiple individuals. _____ **3,462**

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 8 Table](#)

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

39. Report the number of confidential financial disclosure reports required to be filed by December 31, 2021, **excluding** SGEs, and the number of reports actually filed by December 31, 2021.

	a. Required	b. Filed	
		OGE Form 450	328,423
		OGE-approved alternative form	46,585
Total	377,009		375,008 (99%)

Note: If a 450 filer leaves the filing position before the due date, the report is not required per 5 C.F.R. 2634.903(a).

Example for new entrant reports: If an employee started at the agency on December 15, 2021, and filed a new entrant report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, 2022, the employee has not filed a new entrant report, do not count that report in your required numbers. Instead, include the report in your 2022 questionnaire response to be filed in 2023.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. _____ [See Question 39 Table 1](#)

40. Note the number of confidential financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude** reports of SGEs. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605 and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	How many reports did your agency certify or close in 2021?	Of those certified or closed in 2021, how many were initially reviewed within 60 days?	Of those certified or closed in 2021, how many were certified or closed within 60 days?
	365,003	343,519 (94%)	327,539 (90%)

a. OGE Form 450 and OGE-approved alternative			
----------------------------------------------	--	--	--

If applicable, please explain why some reports were reviewed more than 60 days after submission. _____ [See Question 40 Table 1](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **59**
- remedial action was being taken **19**
- other (specify) _____ **38** [See Question 40 Table 2](#)

41. Number of OGE 450 or OGE-approved alternative forms granted filing extensions in 2021: _____ **16,038**

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 9 Table](#)

PART 10. ENFORCEMENT OF STANDARDS OF CONDUCT AND CRIMINAL AND CIVIL STATUTES

42.

Number of disciplinary actions taken in 2021 based wholly or in part upon violations of the Standards of Conduct provisions (5 C.F.R. part 2635) or your agency’s supplemental Standards (if applicable). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents

a. Total number of disciplinary actions that met the above criteria	633
---------------------------------------------------------------------	------------

Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

i. Subpart A (General Provisions)	180
ii. Subpart B (Gifts from Outside Sources)	14
iii. Subpart C (Gifts Between Employees)	7
iv. Subpart D (Conflicting Financial Interests)	13
v. Subpart E (Impartiality in Performing Official Duties)	33
vi. Subpart F (Seeking Other Employment)	10
vii. Subpart G (Misuse of Position)	291
viii. Subpart H (Outside Activities)	41
iv. Agency’s supplemental Standards of Conduct	63

43.

Number of disciplinary actions taken in 2021 based wholly or in part upon violations of the criminal conflict of interest statutes (18 U.S.C. sections 203, 205, 208, and 209), failure to file or filing false public financial disclosures (5 U.S.C. app. section 104 or 18 U.S.C. section 1001), civil matters involving outside earned income (5 U.S.C. app. section 501), or outside activities (5 U.S.C. app. section 502). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents

a. Disciplinary actions taken based on violation of ethics laws	18
-----------------------------------------------------------------	-----------

Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

i. 18 U.S.C. section 203 (Compensation in Matters Affecting the Government)	0
ii. 18 U.S.C. section 205 (Claims Against and Matters Affecting the Government)	0

iii. 18 U.S.C. section 208 (Acts Affecting a Personal Financial Interest)	12
iv. 18 U.S.C. section 209 (Supplementation of Salary)	1
v. 5 U.S.C. app. section 104 or 18 U.S.C. section 1001 (Failure to File or Filing False Public Financial Disclosures)	4
vi. 5 U.S.C. app. section 501 (Outside Earned Income)	0
vii. 5 U.S.C. app. section 502 (Outside Activities)	0

44. Number of referrals made in 2021 to the Department of Justice of potential violations of the conflict of interest statutes (18 U.S.C. sections 203, 205, 207, 208, 209), failure to file or filing false public financial disclosures (5 U.S.C. app. section 104 or 18 U.S.C. section 1001), civil matters involving outside earned income (5 U.S.C. app. section 501) or outside activities (5 U.S.C. app. section 502)

a. Referrals to Department of Justice	55
---------------------------------------	-----------

Of the referrals to DOJ (line a.), please note the DOJ referral status

b. DOJ Referral Status	
i. How many of those referrals were accepted for prosecution?	7
ii. How many of those referrals were declined for prosecution?	39
iii. How many of those referrals were pending DOJ's decision as of December 31, 2021?	9

Of the referrals to DOJ (line a.), please note the agency disciplinary status

c. Agency Disciplinary Action Status	
i. Of the cases referred to DOJ, how many resulted in disciplinary or corrective action?	3
ii. Of the cases referred to DOJ, how many resulted in a determination not to take disciplinary or corrective action?	8
iii. Of the cases referred to DOJ, how many are pending a determination as to whether disciplinary or corrective action will be taken?	21
iv. Of the cases referred to DOJ, how many involved employees who left the agency before the agency determined whether or not to take disciplinary action?	14

v. Of the cases referred to DOJ, how many involved 18 U.S.C. 207, such that there was no option for disciplinary action?	6
--------------------------------------------------------------------------------------------------------------------------	----------

45. Did your agency notify OGE of all referral(s) and disposition(s) of the referral(s) via OGE Form 202 (as required by 5 C.F.R. 2638.206(a))?

- Yes **20**
- No (specify why) _____ **5** [See Question 45 Table 1](#)
- Not applicable because no covered referrals were made to DOJ _____ **106**
- Not applicable (specify why) _____ **8** [See Question 45 Table 2](#)

ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 10 Table](#)

PART 11. ETHICS PLEDGE ASSESSMENT (Executive Order 13989 (“Ethics Pledge”))

46. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service ((SES), Schedule C, etc.) appointed to or by your agency from January 20 through December 31, 2021?

- Yes **71**
- No (*skip to #48*) **68**

Note: For guidance on what constitutes a full-time non-career appointee for purposes of the Ethics Pledge, see [LA-21-07](#).

47. For each category of appointee, provide the number of full-time non-career appointees appointed between January 20 and December 31, 2021, and indicate the number who did and did not sign the Ethics Pledge.

Number of Full-Time Non-Career Appointees	Type of Full-Time Non-Career Appointees by Category					
	PAS	PA	Non-career SES	Schedule C	Other	Total
a. Appointed 01/20/2021 – 12/31/2021	250	576	692	1,138	163	2,819
i. Signed the Ethics Pledge in 2021	230	550	681	1,105	151	2,717
ii. Required to sign the Pledge in 2021 but signed in 2022	4	13	9	15	6	47
iii. Required to sign the Pledge, but did not sign (please explain)	0	0	0	0	1	1
iv. Not required to sign the Pledge because occupied an exempt non-policymaking position (Schedule C or other comparable authority)	0	0	0	16	0	16
v. Not required to sign the Pledge because appointed without	16	0	2	2	0	20

	break in service after serving in another position for which the Ethics Pledge was already signed						
vi.	Not required to sign for another reason (please explain)	0	13	0	0	5	18

For each appointee identified in line iii, please explain why that appointee did not sign the Pledge. _____ [See Question 47 Table 1](#)

For each appointee identified in line vi, please explain why that appointee was not required to sign the Pledge. _____ [See Question 47 Table 2](#)

If applicable, please explain discrepancies between the number appointed and the number who signed or did not sign the Pledge. _____ [See Question 47 Table 3](#)

48. Holdover appointments

How many individuals appointed in a prior administration stayed on in their position ("holdover appointees") beyond 100 days? *Note:* For guidance on what constitutes a "holdover appointee" for purposes of the Ethics Pledge, see [DO-09-010](#), [DO-09-014](#), [LA-21-05](#), and [LA-21-07](#).

a. _____ (If zero, skip to Q50) **42**

b. Of the holdover appointees who stayed beyond 100 days, how many signed the Pledge? _____ **28**

c. For those who did not sign the Pledge, please explain why not: _____ [See Question 48 Table 1](#)

49. How many appointees were registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment? For purposes of this question, please include individuals appointed between January 20 and December 31, 2021, and subject to the Ethics Pledge, as well as holdover appointees subject to the Pledge. _____ (if 0 skip to Q52) **19**

50. How many of the appointees identified in your response to the previous question as registered lobbyists and/or registered under the Foreign Agents Registration Act during the two years prior to their appointment have an ethics agreement addressing their obligations under paragraph 3 of the Ethics Pledge? _____ **4**

51. For any appointee identified in your response to question 49 who does not have an ethics agreement, please provide their name and an explanation (e.g., Pledge paragraph 3 not reasonably expected to limit participation in any agency matters because appointee's duties sufficiently unrelated to prior lobbying activities.) _____

[See Question 51 Table 1](#)

52. Section 3 of Executive Order 13989 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted to appointees in your agency in 2021, the names of those individuals granted waivers in 2021, and which of the Pledge paragraphs were implicated.

	Number of Ethics Pledge Waivers Granted By Pledge Paragraph	Name(s) of Individual(s) Granted Ethics Pledge Waivers
a. Paragraph 1	0	
b. Paragraph 2	12	Aviva Aron-Dine C. William Nelson Celeste Drake David Cohen Dr. Suhas “Micky” Tripathi Natasha Natasha Bilimoria Elizabeth Prelogar Gabriela Chojkier Kristine Lucius Marianne Engelman-Lado Martha Williams Pamela A. Melroy
c. Paragraph 3	7	Alethea Predeoux Celeste Drake Charanya Krishnaswami Erika Moritsugu Kristine Lucius Michelle Brane Vanita Gupta
d. Paragraph 4	0	
e. Paragraph 5	0	
f. Paragraph 6	0	
g. Paragraph 7	0	
h. Paragraph 8	0	
i. Paragraph 9	0	
j. Other (please explain)	0	

If other, please explain. _____ **9 Agencies responded N/A**

53. Were there any violations of Executive Order 13989 during 2021?

- Yes **1**
- No **138**

54. Please provide information on enforcement actions taken in 2021 as a result of violations of the Executive Order 13989 Pledge. _____

EPA Ethics learned of two apparent pledge violations. In both cases, EPA Ethics consulted with the White House and the political appointees were provided appropriate counseling.

ADDITIONAL COMMENTS FOR PART 11. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 11 Table](#)

PART 12. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

55. How many Special Government Employees (SGEs) did your agency have, in total, during calendar year 2021? _____ (if zero, skip to Additional Comments for this Part) **38,288**

56. Initial Ethics Training

a. How many SGEs who were expected to serve for 60 days or less on a board, commission, or committee were required to receive Initial Ethics Training (IET) by December 31, 2021 (5 C.F.R. 2638.304(b)(2))?	25,954
i. How many of those SGEs received IET before or at the beginning of the first meeting?	24,537 (94.5%)
ii. How many of those SGEs received IET after the first meeting?	126 (0.5%)
iii. How many of those SGEs have not received IET as of today?	1,291 (5%)

If applicable, please explain why some SGEs received IET after the first meeting or have yet to receive IET. _____ [See Question 56 Table 1](#)

57. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2021, and the number of reports actually filed by December 31, 2021.

	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
a. Advisory Committee Members (FACA)	27,824	27,604 (99%)	18	18 (100%)
b. Advisory Committee Members (non-FACA)	507	425 (83%)	0	0
c. Experts/Consultants	1,657	1,642 (99%)	33	32 (97%)
d. Board Members	171	163 (95%)	17	16 (94%)
e. Commissioners	53	49 (92%)	18	18 (100%)
f. Other	1,132	1,125 (99%)	112	111 (99%)
TOTAL	31,344	31,008 (99%)	198	195 (98%)

Example for new entrant and termination reports: If an employee joined (or departed) the agency on December 15, 2021, and filed a new entrant (or termination) report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant (or termination) report, do not count that report in your required numbers. Instead, include the report in your 2022 questionnaire response to be filed in 2023.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. _____ [See Question 57 Table 1](#)

58. Note the number of SGE disclosure reports certified or otherwise closed by your agency during the calendar year. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605, section 4.02 of the Public Financial Disclosure Guide, and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	Confidential Reports	Public Reports
a. How many reports did your agency certify or close in 2021?	29,459	240
b. Of those certified or closed in 2021, how many were initially reviewed within 60 days?	29,359 (99%)	232 (97%)
c. Of those certified or closed in 2021, how many were certified or closed within 60 days?	29,096 (99%)	218 (91%)

If applicable, please explain why some reports were reviewed more than 60 days after submission. _____ [See Question 58 Table 1](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **11**
- remedial action was being taken **1**
- other (specify) _____ **14** [See Question 58 Table 2](#)

59. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. 2634.904(b): _____ **21,309**

60. Extensions and late filing fees for SGE financial disclosure reports:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
a. Number of OGE Form 278e Reports	38	7	1
b. Number of OGE Form 450 or OGE-Approved Alternative Forms	207		

ADDITIONAL COMMENTS FOR PART 12. Please indicate the question number to which the comment corresponds. [See Additional Comments Part 12 Table](#)

ADDITIONAL QUESTIONNAIRE COMMENTS: [See Additional Comments Table](#)

Appendix

Question 6 Table 1

Attending ethics meetings
Human resources support
Contractors provide paralegal support to Ethics Officials at some NASA centers such as collecting information for financial disclosure and ethics advice in-take, and performing legal research and research on financial products and services related to entries.

Question 7 Table 1

Ethics Counseling
The ASBCA's GS employees are hired via the Army's civilian personnel system. Army provides prospective employees with required ethics notices.
Ethics Counsel support for the ethics program
New entrant and annual training.
FDM
Financial Disclosure Management System (FDM)
1. Provides FDM electronic filing system for Confidential Financial Disclosure reporting. 2. Provides DoD-wide ethics policies and regulations.
FDM Support
Office of Special Counsel with Hatch Act advice. FBI: Office of Director of National Intelligence with Employee Resource Group guidance.
The Department of State uses the Department of the Army's Financial Disclosure Management System (FDM) secure online program for the Departments OGE-450 filers.
The Farm Credit System Insurance Corporation (FCSIC) is a small Federal corporation that shares many services with the FCA. The FCA Designated Agency Ethics Official (DAEO) is the DAEO for the FCSIC, and with her ethics team, supports all of the FCSIC's ethics requirements including financial disclosure, ethics training, and advice and counseling.

General ethics counseling, financial disclosure filing administration and review
IJC uses the on-line distance learning ethics training provided through the Department of State Foreign Service Institute.
NARA uses a USG shared services provider (through an IAA) for certain Human Capital services. For example, the provider prepares and sends offer letters and includes ethics information in those letters.
NCUA uses Army's FDM e-filing system to manage the agency's confidential financial disclosure reports.
Annual training for financial disclosure filers was provided by the General Counsel of the Inter American Foundation.
OGE assisted us with an ongoing benchmarking project and provided a comparison with other agencies. SOCO provides monthly coordination meetings and DoD specific legal advisories.
NSC received assistance with preparing ethics training for NSC staff, and consulted White House Counsel's Office and the Office of Administration on topics such as financial disclosure forms, outside engagements, and gifts.
Provides ethics notices in offer letters to new hires.
Ethics Questions
Provided ethics training for some OPM employees of the President's Commission on White House Fellowships.
DOD: provides information, tech & comms support to EOP OA: provided platform for virtual ethics training (initial and annual) OSC: provided Hatch Act training
Conducted annual ethics training.
Ethics Compliance Tracking System
The White House Counsel's Office provides support by certifying Public Financial Disclosure Reports and Confidential Financial Disclosure Reports for OVP staff.
We worked with Army to continue using their Financial Disclosure Management (FDM) system for our confidential financial disclosure report filers.
We use their FDM system and they provide help desk support if needed. They don't provide any additional services related to the review of reports.
HUD's ethics office administers USICH's ethics program.

Question 8 Table 1

<p>The Bureau’s Director serves on the Board of Directors for the FDIC. Prior to each FDIC Board meeting, the Ethics Office reviews all Board cases for potential ethics issues and provides ethics guidance to the Bureau Director in connection with his FDIC Board duties, as necessary.</p>
<p>All ethics work, to include training and filing.</p>
<p>1) Because the Southeast Crescent Regional Commission did not, at that time, have its own Designated Agency Ethics Official (DAEO), the White House requested that USDA's DAEO work together with OGE to assist the nominee to be Federal Co-Chair with her nominee Public Financial Disclosure Report (OGE-278e) and her Ethics Agreement. Since that time, we understand that this Commission has its own DAEO. 2) Office of Special Counsel (OSC) -- USDA's DAEO was requested by OSC leadership to provide an hour-long annual ethics training to all OSC employees on 11/4/2021. During the training USDA's DAEO answered questions from the attendees. 3)USDA's Office of Ethics, in cooperation with NASA's OGC and NASA's Johnson Space Center, created an innovative new Ethics Training Game featuring avatars in a story-based ethics training module that combines space exploration, food sustainability, diversity, and the Federal Ethics rules. This training game module has been used by not only USDA employees, but USDA has also provided this training game module to NASA (which uses this training for its employees. USDA has also placed this Ethics Training Game on the USDA Ethics Mobile App as a resource available for Federal Ethics Officials and Federal employees across the government. This training game is the first government Ethics training to use high-tech educational gamification to teach the Ethics rules with an emphasis on space exploration, food sustainability, and racial, ethnic, and gender diversity and inclusion in an avatar-based training game.</p>
<p>Technology</p>
<p>FDM provided financial disclosure report filing support to the Office of the Secretary of Defense, Department of the Air Force, Department of the Navy, Armed Services Board of Contract Appeals, Defense Contract Audit Agency, Defense Counterintelligence and Security Agency, Defense Commissary Agency, State Department, Defense Finance Accounting Service, Department of Homeland Security, Defense Intelligence Agency, Defense Information Systems Agency, Defense Logistics Agency, Department of Defense Inspector General, Defense Threat Reduction Agency, National Credit Union Administration, National Geospatial-Intelligence Agency, Office of Government Ethics, Special Inspector General for Afghanistan Reconstruction, United States National Guard, Uniformed Services University of the Health Sciences, and the Department of Veterans Affairs.</p>
<p>Advice, counseling, ethics training and financial disclosure review and certifications</p>
<p>HUD’s agency ethics officials administer all portions of an ethics program for USICH</p>

Outside activities guidance.
Reviewed confidential financial disclosure reports for potential nominees.
The FCSIC is a small Federal corporation that shares many services with the Farm Credit Administration (FCA). The FCA Designated Agency Ethics Official (DAEO) is the DAEO for FCSIC, and with her ethics team, supports all of FCSIC's ethics requirements including financial disclosure, ethics training, and advice and counseling.
Annual Ethics Training for staff
The DAEO reviews the financial disclosure reports filed by IBC confidential and public disclosure filers.
Provided the UAG FACA Committee with financial disclosure review, ethics advice and training, and ethics related administrative support. Following Presidential transition, provided post-employment advice to a former White House Office official per OGE coordination.
NARA provides ethics support to the Public Interest Declassification Board, an independent board. The Information Security Oversight Office, which is part of NARA, serves as the Executive Secretariat for the PIDB and it can call on other NARA offices for support. NARA is authorized to expend its appropriations on PIDB activities, as PIDB does not receive any appropriations directly. The CRCCRRB is just getting organized and NARA reviewed and cleared 450s at White House and OGE request prior to nomination.
Addressed potential ethics and conflicts issues involving SGEs serving on the CASB.
ONDCP's Office of the General Counsel (OGC) reviewed all proposed contracts to ensure that Commission funds were spent in an ethical manner, and were executed in line with the Federal Acquisition Regulations. Furthermore, ONDCP OGC advised the six Executive Branch agencies represented on the Commission of their duty to act on one accord on behalf of the President, as required by the US Constitution's Separation of Powers clause
Ethics training, advice and counseling for employees and review of requests for participation in outside events.
Ethics review of financial reports, annual ethics training, ethics advice for conflicts.
Nominee ethics reports
Ethics guidance, advice and counseling financial disclosure reporting and review public disclosure of financial disclosure reports

Question 9 Table 1

Budgetary
Additional staffing and budgetary resources would allow enhanced ethics services
HUD: Budgetary/OIG: IT Resources
ATF: Budgetary
To maintain our current level of customer service on counseling questions and to accommodate the burgeoning need for programmatic responsibilities over a decentralized ethics program, we need additional FTE and continued funding.
Would appreciate more PowerPoint training samples
Now that we have established an electronic filing system for confidential filers, we continue to explore ways to leverage technology to support our advice and education programs. Additional resources and peer-to-peer sessions involving how agencies use technology for these programmatic areas would be valuable. It would also be helpful to receive additional information on the conflicts and financial disclosure issues related to cryptocurrency.
Interactive training materials that can be repurposed at agencies. Watching long talking head videos is not something our Commission Members will do.
Budgetary

Question 10 Table 1

Both the Chairman and the Executive Director positions have been vacant since early in 2021.
NA
Agency Head is the ADAEO.
PBRB consists only of 1 FTE, 5 part time SGEs, 2 detailees from other agencies, and contract staff.
No agency head

Question 12 Table 1

Updated policies were drafted to address the use of disclaimers in outside writing more consistently.
Policy updates and written procedures (see response to Q. 13).
ABMC updated its basic ethics policy in 2021. The new policy incorporates training and financial disclosure requirements set forth in statute and OGE regulations. ABMC also designated new confidential financial disclosure report filers who previously had not been officially designated.

AFRH implemented electronic filing for 450 filers effective CY 2022
new proposed ethics policies for senior FOMC officials
OGC automated delivery and submission of CCR-17 modified financial disclosures and initial and annual ethics training for its over 500 advisory committee members after failing to deliver training and disclosures last fiscal year. We also created interactive, USCCR branded initial and annual training after using training from other agencies and NIH for years.
Programmatic changes included changing our annual ethics training curriculum to cater training to individual offices within the Agency. We updated our materials to use examples that were relevant to each operating unit, and engaged with operational leadership prior to each session.
The Office of Inspector General for the Board of Governors of the Federal Reserve System and the Consumer Financial Protection Bureau (OIG) announced an Evaluation of the Supervision, Enforcement, and Fair Lending Divisions (SEFL) Approach to Assessing Independence and Mitigating Risks of Conflict of Interest on February 4th, 2021. As part of that assessment, the OIG reviewed various training materials and policies relating to SEFLs ethics compliance obligations. The OIGs review is currently on hold and results or findings remain pending.
In 2021, CEQ reevaluated and refined its confidential financial disclosure determination process in adjusting to the needs of a larger organization. Via an updated policy, CEQ streamlined its process for evaluating CEQ staff outside events. Additionally, CEQ implemented a dedicated ethics email account for both internal and external ethics questions.
The Ethics Office utilized a dedicated email address for ethics-related inquires and streamlined the financial disclosure process to be fully electronic, and to incorporate communication between supervisor, filer, and ethics office.
Need to increase amount of ethics newsletters to inform the 236 stores and distributions centers world-wide. Additionally, there is a need for HR to adjust the tracking of new employee orientation which includes ethics training for new employees.
1)Revision of our SOPs for monitoring progress of initial ethics training. We had not revised our policies regarding supervisors' management of new employees on-boarding procedures in the enhanced telework use environment. An unacceptable level of new hires skipped the virtual training. 2) Revision of our use of the electronically generated FDM/AGEARS opinion for post government employment to include DoD senior employee lobbying restrictions from the 2018 NDAA.
Due to staff turnover, DIA OGC's Ethics program was staffed by a single attorney in the beginning of 2021. The evaluation resulted in increased billet allocations and hiring actions to mitigate staffing level issues.

Continued evolution of Leader Led Training, Virtual Training methods.
As a result of the evaluation, we are conducting a detailed review and revision of all of our ethics program policies and procedures. Specifically, we are in the process of drafting a new policy/procedure governing the overall operations of the ethics program (e.g., required ethics trainings and notices).
Revised procedures to identify and track new DTRA employees, new entrant filers, and initial ethics training. Updated SOP and developed a worksheet for receiving foreign gifts.
The Denali Commission is a very small agency (14 people) with a small ethics program. The program was determined to meet the agency's needs and so no change was made.
Outside entity evaluation: no changes resulted - Evaluation is ongoing Programmatic changes: - Developed updated memorandums - Created new handouts to supplement ethics training program - Created new process by which annual ethics training is given to OGE Form 450 filers - Investigating creation and implementation of an automated way to engage with clients and gather necessary data to implement the program for distantly located units - Adjusted format of initial ethics training - Updated new employee ethics training presentations - Identified better means of proving new employee training - Improved record-keeping - Ensured SAF/GC and DoD SOCO ethics information provided to new civilian employees during initial ethics training Policy changes: - Opted to incorporate policies to foster greater efficiency and organization by way of a new record system for maintaining completed initial ethics training
Improved coordination with Army Human Resources offices. Improved tracking of initial ethics training, incorporating ethics office into outprocessing checklists, development of an OGE 450 filer SOP, improved documentation of potential conflicts of interest in financial disclosure reports.
A number of subordinate commands underwent Inspector General (IG) reviews as well as other internal audits which resulted in program and policy changes including updates with training tracking, gift processes, and use of government resources. Additionally, OAGC(E) conducted an Ethics Assist Visit for an echelon II command and subordinate commands. Results included updates to ethics training tracking and financial disclosure processes.
Programmatic changes: The DAEO makes programmatic changes as needed during bi-weekly DAEO meetings. For example he requested ethics training presentations be identified on the GC calendar he requested senior executive actions be tracked on our bi-weekly agenda and he requested ethics articles be changed from a proscriptive to a compliance based perspective. Policy changes: The DAEO makes policy changes as needed during bi-weekly DAEO meetings. For example all Ethics Program team members are either Agency or Alternate Agency Administrators in the INTEGRITY electronic filing system. This will ensure three personnel working INTEGRITY have permissions to add filers, assign new reports, and manage assigned

<p>reports in the system. Because DoD OIG/OGC has a policy to ensure at least one team member is on duty during the regular work week, there will always be someone available to administer INTEGRITY filer matters.</p>
<p>Programmatic changes resulting from DoD internal evaluations varied by agency/command. The GAO PGE audit resulted in DoD initiating DFARS Case No 2021-D030 to add FY 2018 NDAA Section 1045 compliance certification to existing contractor PGE certifications.</p>
<p>Agency components continue to digitize and automate ethics programs for easy information storage, retrieval, and utilization. Examples include reorganizing the HHS ethics intranet site, additional components adopting the Departments electronic reporting system for outside activities, and components coordinating more closely with HR. One large component has implemented monthly oversight review meetings of its entire ethics program and has used these meetings to establish a number of SOPs and consider additions to its prohibited assets lists. Additional program improvements may be recommended on a case-by-case basis, including increases in staffing and staff cross-training, among others. Additional agency components have added requirements for all of the component's employees to complete annual ethics training, regardless of financial disclosure filing status. The Department continues to update agency ethics policy based on regulatory updates and changes.</p>
<p>Identified weakness in certifying reports within 60 days and IET completion. Several components implemented improved review processes and established better system of alerts with Human Capital, Training, managers for new employees to timely complete their ethics training.</p>
<p>HUD: Updated OGE-278 review process to incorporate specific deadlines for escalating situations where filers are not responsive. OIG: HUD OIG OLC reorganized the ethics portion of our practice. Previously, a single attorney was primarily responsible for the entire portfolio. We added staff, developed a working group, and designated team leads for various functions. The new structure allows us to be more responsive, and provides built-in coverage for periods of leave and TDY. Additionally, OLC Ethics partnered with the Human Capital Management Division, so that OLC Ethics now provides live (in-person/virtual) New Employee Ethics Orientation training to onboarding employees on the first day of every pay period.</p>
<p>Updating procedures, amending responsibilities, amending policies and enhancing programs and training.</p>
<p>Identified changes had already been implemented.</p>
<p>Dept conducted routine audit of financial disclosure program.</p>
<p>The DEO established a data integrity working group to ensure data integrity in all parts of the DOI Ethics Program, with a focus on financial disclosure filer identification and tracking.</p>

Most DOT Operating Administrations deployed the FDonline e-filing system for OGE Form 450 reports in CY 2021. In addition, based on their number of filers, some Operating Administrations began sending monthly 278-T reminder emails to 278 filers in CY 2021.

DO/HQ: Implemented automated one and two-week email reminders to filers for confidential financial disclosure reports that are due, to help improve OGE 450 filing timeliness and dedicate staff resources to other ethics matters enhanced new employee template/form and added questions to identify potential conflicts further refined process for pre-vetting new employees hired for specific duties and programs (e.g., CARES , American Rescue Plan) in connection with Transition and refined pre-vetting process for non-PAS. Continued at Comments.

Ethics Specialty Team (EST) moved under the direct supervision of Principal Deputy General Counsel, the senior career official. Supplemental ethics regulation is being drafted. Designated additional deputy ethics officials (ethics advisors) at VA Medical Centers to assist in providing local ethics guidance. Designated Deputy DAEOs to assume programmatic ethics oversight of VA's three administrations: Veterans Health Administration (VHA), Veterans Benefits Administrations (VBA) and National Cemetery Administration (NCA).

Cognizant of OGE's plenary review recommendations, we focused on the confidential financial disclosure process, which is not directly managed by EPA Ethics due to EPA's decentralized program. We examined the e450 filer designation process and determined that Deputy Ethics Officials (DEOs) were not systematically apprised when new hires started in their offices, impairing their ability to ensure timely training. In 2021, EPA Ethics partnered with the Office of Human Resources Systems Division and Business Automation Platform managers to integrate their new hire data into a single ethics dashboard that contains program management tools and visual process management tools for ethics officials. Now, DEOs can view the names of new hires as they arrive to facilitate their tracking filing and training completion. We have not yet solved another systemic issue, which is to incorporate the DEOs in making determinations about 450 filing status for individual employees prior to hiring. We also identified an emerging problem that we will address in 2022. Under the e450 system, all filers must be registered in the Agency's ordering system, eBusiness. EPA Ethics discovered that a legacy filer designation process, still being used in some parts of the Agency, resulted in two differing lists of filers with partial overlap, causing significant confusion among classification specialists, hiring officials, and ethics officials. To correct the underlying problem, EPA Ethics will convene a process in 2022 to integrate DEO approval of 450 designations into the position classification process. We continue to work on addressing a concern raised by GAO and OGE about EPA's alternative confidential financial disclosure filing system for SGEs, which is still a paper process only. In 2021, EPA partnered with login.gov to provide secure authentication and login credentials to SGEs so that they will be able to access and file their 3110-48 forms online in the near future.

<p>Programmatic changes included Modernized processes and procedures such as converting PDF applications to Webform, Gift approval process refinements, & perfecting on-boarding process with HR. Policy changes were revisions to policy letters and SOPs.</p>
<p>An evaluation of the annual ethics training program revealed that employees prefer receiving interactive online ethics training in 15-minute segments. Previously, segments were released on a quarterly basis. However, employee feedback indicated that some would like all training segments released earlier in the year to provide them with maximum flexibility to complete the training at a time convenient to the employee. Based on this feedback, we plan to release each of the 15-minute training segments as they are developed, rather than waiting for the beginning of a new quarter.</p>
<p>An evaluation of the annual ethics training program revealed that employees prefer receiving interactive online ethics training in 15-minute segments. Previously, segments were released on a quarterly basis. However, employee feedback indicated that some would like all training segments released earlier in the year to provide them with maximum flexibility to complete the training at a time convenient to the employee. Based on this feedback, we plan to release each of the 15-minute training segments as they are developed, rather than waiting for the beginning of a new quarter.</p>
<p>No security or privacy control findings were discovered during the course of testing that required any action on the part of the FOnline System ISM and Project Team.</p>
<p>The Inspector General did a review of the ethics program regarding conflict of interest, impartiality, and recusal obligations and we adopted certain changes including more frequent reminders and emphasis of those topics in trainings.</p>
<p>KPMG did not recommend any changes to FERC's ethics program. Following KPMG's review, however, our office elected to provide additional back-up staff support and to modify the way we maintain certain records.</p>
<p>OIG's audit began in October 2021. It has not yet been completed.</p>
<p>Administration of ethics training for employees was strengthened otherwise no changes needed for small staff with very few ethics issues arising.</p>
<p>We felt that we were meeting all major benchmarks with the programs as available.</p>
<p>The DAEO determined the ethics program is currently addressing the ethics needs, concerns and requirements of the agency Director, staff and SGEs. Nonetheless, we thought it beneficial to provide additional briefing to our Board members, as well as, grant officials.</p>

<p>OGC reviewed processes for reviewing conflict of interest in our grantees and implemented a policy that our Program Office needs to translate any ethics information from our grantees into English before submitting to our office for review.</p>
<p>Alerted that not adequate annual training was occurring, so performed additional training to them at all staff meeting also alerted difficulty tracking training due to nearly all staff teleworking, so have but the responsibility on supervisors to make the sign-in sheet submitted accurate and complete</p>
<p>New Alternate Designated Agency Ethics Officer brought on and trained to assist with the IJC's program. Discussions with DOS HR on issuance of notice of ethical obligations in written offers of employment.</p>
<p>NASA OGC's Legal Leadership Team continued to review OGC operations in conjunction with OGC's reorganization as an enterprise with Center Chief Counsel's reporting to the NASA General Counsel. NASA OGC's Ethics Best Practices Working Group reporting to the ADAEO produced various products such as review and drafting cautionary letters, and internal guidance for post-employment. NASA's ethics program also developed and implemented an agency-wide electronic platform for outside activity requests. To strengthen ethics program oversight, the DAEO will monitor timeliness of financial disclosure review at all NASA OGC locations.</p>
<p>OIG is conducting an audit of NARA's exit clearance processes, which includes the requirement that OGE 278 and 450 filers receive an ethics briefing before separating or transferring from NARA. OIG auditors have requested information from the ethics program, but the audit remains ongoing as of 1/1/2022.</p>
<p>(1) Guidance provided to applicable NCUA OGE 278 filers regarding potential conflicts of interest. (2) Post-government employment ethics counseling for all exiting employees (previously was limited to NCUA's 278 filers). (3) Centralized new employee onboarding ethics training and post-government employment ethics counseling functions in the Office of Ethics Counsel. (4) Annual ethics training was mandatory for all NCUA employees in CY2021, regardless of financial disclosure filer status. (5) Monthly meetings of DAEO and agency head to discuss ethics program.</p>
<p>Procedures regarding ethics notices and trainings were codified in written policies.</p>
<p>NGA's ethics program answered all of KPMG's questions and met their criteria to pass the audit without any additional recommendations for improvement.</p>
<p>Approval to hire additional staff to handle increased workload and the Office of the Chief Information Officer (OCIO) was directed to assist us in development of a comprehensive case management system.</p>

No changes were recommended.
Continuing efforts initiated in 2020, the ethics office reviewed existing practices for communicating with financial disclosure filers regarding the filing of reports. As a result of the review, the ethics office implemented a process of cascading messaging from Agency leadership to enhance filing compliance particularly among OGE 450 filers. We also enlisted the support of Directorate Chiefs of Staff to assist with delinquent training.
We regularly evaluate our program for areas of improvement and have discussions with agency leadership about those efforts. Programmatic changes: The agency implemented an electronic filing system, FDOonline, for confidential reports. Based on information from the 2020 AET survey and discussions with OGE, we developed our 2021 AET to address feedback from the survey and questions we received throughout the year. Policy Changes: We continue to improve our communication and processes with the human resources department. We finalized the agency's draft of its supplemental regulations and submitted it to OGE for review.
Modifications were made to the internal controls governing the agency's prohibited securities rule program.
Tracking of forms was updated.
Ethics Program was updated last year during OGE audit. This year's evaluation did not identify any other necessary changes.
The DAEO and ADAEO now meet with the Director and Chief of staff to report out on programmatic performance and planned action on a semi-annual basis.
Continuous improvement. In 2021, that included enhancements to OMB's Ethics Portal and the provision of specialized training.
Programmatic changes - Moved from online training to in-person via Zoom Policy changes - ONDCP modified our internal ethics vetting process for external events with stakeholders. The process is more formalized with standard questions that we ask to screen for ethics problems
No deficiencies found, so no changes recommended.
updated ethics guidance and provided additional ethics resources to staff (including through monthly newsletters and information posted to an intranet legal page)
Supplemental rule on prior approval for outside activities was issued. Other proposed changes were discussed but not adopted because after discussion the current approach was preferred.
OGC conducted an evaluation and met with the DAEO and Agency leaders (COO, CIO, Security) re technology/system issues with the financial disclosure filing system. We made a

determination to move the Agency to Integrity for the 2022 filing cycle. Future plans involve creating a new OGE 450 filing system as well.
added a new attorney to the administrative law staff
Nothing was reported to the DAEO re changes needed.
The review concluded that the ethics program was functioning smoothly and had fully transitioned to a remote work environment.
The agency adopted a new pay system. Based on that pay system, the DAEO and HR Department evaluated and changed how employees are designated to file Public and Confidential Financial Disclosure Reports.
The new acting General Counsel undertook a review of employees required to file confidential disclosures, in light of a new contract approval process.
Based on OIG recommendations, one Division is re-evaluating its policies and procedures for the pre-publication clearance process for submissions involving professional/academic journals to ensure consistency of management visibility.
Requiring offers of employment to contain the appropriate ethics language
Met all the audit requirements.
Based on the recommendations from the assessments, TVA is 1) revising its written standards to more effectively communicate expectations to employees and other stakeholders, 2) developing a managers ethical toolkit to provide leaders with tools and support materials, 3) automating manual processes, 4) implementing a standardized investigations protocol, and 5) utilizing committee structures to engage in more robust cross-functional information sharing.
Annual ethics training topic scope and focus continues to be adjusted to include areas of high risk for the agency and to utilize interactive tools available during training, to include interactive polls. Written procedures were reviewed and modified accordingly, and additional practices were added to procedures to increase ethics program communications with agency programs and personnel regarding financial disclosure designations and filing requirements, and to provide resources and information to personnel with a need to know to accomplish ethics program requirements and conflicts of interest prevention measures.
Now require intermediate review of all OGE-450 reports, moved responsibility to track financial disclosure and ethics training requirements in field offices from deputy ethics officials to administrative officers, and continuing to evaluate other potential changes to standard operating procedures.

We added updated interactive ethics training curriculum to our ethics program.
We perform yearly self-assessments of the program. We created a cross-Functional Ethics New Employee Orientation Video on areas of focus (mail destruction, mail theft, misuse of voyager cards). We launched an ethics app for smartphones. We created a New Craft Employee Orientation Ethics Video Script.
General policy updates

Question 13 Table 1

Because we're so small, the DAEO just works directly with the SGEs to ensure they fill out their OGE450s annually. If a new SGE is appointed, the DAEO will work with that individual to ensure their documentation is reviewed and approved as appropriate.

Additional Comments Part 4

USADF has finalized the following procedures, for OGE's review during its routine program inspection: Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. 2638.303) Provision of initial ethics training (5 C.F.R. 2638.304) AND Issuance of ethics notice to new supervisors (5 C.F.R. 2638.306).
We have a separate Financial Disclosure Policy. All other items checked above are included in our agency's Ethics Policy. Both are included in our internal Policies and Procedures Manual.
Q9: Ethics program is in the process of hiring additional ethics attorneys and is working with IT staff to develop additional ethics IT resources to assist program implementation.
Q3 - Our General Counsel serves as the DAEO, and that position has been vacant since January 2021. The Chief of the OGC's Ethics Law Division is our ADAEO, and all responses in this questionnaire directed at the DAEO have therefore been answered by the ADAEO. Q 5- The employees identified as working "less than 1 hour per week" are those who support the financial disclosure program.
The CFA written procedures for issuance of notice of ethical obligations in written offers of employment has been drafted and currently in review.
#2: Counting only full-time employees, the agency had 70 as of 12/31/2021. It also had 4 part-time employees as of the same date.
Q2. This number does not include detailees, interns, and other workers. During 2021, CEQ grew considerably in size, with a significant portion of CEQ personnel being detailees. As of Dec 31, CEQ's ethics program supported 55 full time personnel.
In regards to Question 1, reporting on this Annual Questionnaire also includes data from the Pretrial Services Agency (PSA) for the District of Columbia.
Questions 5 & 9: DCSA is in the process of training and appointing additional employees to perform ethics program duties.

Referencing question 9: Our Ethics program has experienced increased turnover in 2021, but additional billets and hiring were conducted in the latter half of 2021 to reach sufficient staffing levels for our Ethics Program.
Q.2-Since the CY20 AEQ there has been a decrease in civilian employees in the DON. The CY20 AEQ manning numbers were 284,759 civilian employees and 55,816 officers. The CY21 AEQ manning numbers are 206,401 civilian employees and 55,923 officers.
Q11 - The DoD Standards of Conduct Office (SOCO) conducts Program Assist Vists/Reviews with each Deputy Designated Agency Ethics Official (DDAEO) agency/command every three to four years.
Question 10: Inspector General met with OIG Ethics staff.
Q9 and Q12: EOIR would like to use the Integrity system for confidential financial disclosure. NSD would like enhanced procedures to identify arriving and departing personnel.
Q3f: We counted DAEO to GC as 1 GC to Dep/Sec as 2 and Dep Sec to Sec as 3. Q5: Because of increased telework options, some personnel that supported ethics staff moved duty locations during the year. Numbers reflect the duty station where personnel spent most of the calendar year. Q6: IT services for some bureaus, including DO/HQ, but N/A for most. Q9: no for most bureaus but 4 indicated Human Capital and 1 indicated Tech. Q11: About half of the bureaus conducted an internal audit. One had an external financial audit. Q12: One bureau is still evaluating opportunities for training and outreach to employees beyond its standard mandatory annual training. A second found program to be in compliance a third bureau improved guidance provided to employees regarding outside activities and service on boards or organizations, specifically including a more thorough discussion of required recusals and use of official title or Government resources in connection with such activities a fourth bureau implemented changes to designated filing positions and a fifth implemented a bureau-specific ethics policy/SOP.
5b. EST trained 51 Veterans Health Administration facility compliance officers to provide guidance on basic ethics issues at their medical centers. This gives the employees an on-site contact for simple questions and eases the load on the EST to focus on more complex issues. 10. The DAEO met regularly with the Secretary, and the Secretary responded by sending ethics messaging to all VA employees.
Question #5: The five ethics officials that support the FCSIC also support the FCA. Because the FCSIC is very small, many of the activities in administering the FCA ethics program are completed in conjunction with the activities for the FCSIC ethics program.
The Ethics & ADR Unit continued the review and update of our confidential financial disclosure procedures/filers in the FDonline financial disclosure filing system
FHFA is in the process of implementing FD Online to support the confidential financial disclosure program. We are also discussing hiring an FTE in 2022 to focus primarily on financial disclosure
Providing additional resources to smaller agencies (with small budget and fewer staff) for processing confidential financial disclosures filing would be very helpful.

Q4-FMSHRC designated a new ADAEO to replace its former ADAEO as of 1-14-21. The new ADAEO subsequently terminated employment with FMSHRC, and a new ADAEO was designated as of 6-15-21.
#9 - On December 10, 2021, the agency's ADAEO relocated and is no longer employed by IMLS. Because this is a critical position in the agency's ethics program, we are currently in the process of recruiting a suitable replacement.
Q. 13 - NASA had procedures for issuing ethics notices to new supervisors in place prior to reorganization within NASA's administrative enterprise, however, during calendar year 2021 it was not completely followed, so OGC is working with human resources to reestablish full use of these procedures.
Policies were implemented this year.
Question 2: This information is classified.
5b. 4 permanent full-time employees work outside the DC Metro area. The other 3 employees include the following categories: 1 field attorney who was detailed to the Ethics Office and 2 summer interns. All performed both government and legal ethics work for the office.
#2. In addition to 1472 full-time employees, NSF had 216 full-time IPAs on board as of December 31, 2021.
13. The NSC is preparing an ethics notice to new supervisors, which will be used starting in CY2022.
Question 13: In February 2021, we worked with the human resources officials to ensure that all written offers of employment satisfy the requirements of 2638.303 and that all employees entering supervisory positions received the ethics notice to new supervisors. We continue to evaluate the written procedures and are working with the human resources officials to consolidate all written procedures into a single document.
With regard to question 9, we continue to need additional legal staff to support our ethics program, especially as OSTP has onboarded large numbers of new staff.
Question 10: The Office of General Counsel, which includes the DAEO and ADAEO, meet biweekly with the Special Counsel and ethics is one of items discussed.
Notices of ethical obligations in written offers of employment and for new supervisors are provided by USTR's HR servicing office, the Executive Office of the President - Office of Administration.
Q2: This number reflects the number of full-time OVP employees. OVP staff also includes employees of other types, including Senate employees as well as detailees and assignees from various departments and agencies. Q5: OVP has one Ethics Counsel position staffed by a detailee. Additionally, OVP has four other attorney positions (three full-time and one detailee) in the OVP Counsel's Office who also work on ethics matters. Q10: For purposes of ethics program administration, the office head for OVP is the OVP Chief of Staff.
Although the Board has met the substance of the required written procedures, it is currently preparing written procedures as part of its program review.
For #2: Total agency FTE count includes federal civilian and active duty military personnel.
All supervisors are sent periodic notices of ethics and filing obligations

Question 14 Table 1

Question 13: DeCA GC continues to review and update the Ethics SOP as needed to ensure we maintain the required procedures following completion of the OGE Ethics Inspection of DeCA in Spring of 2021.
We received confirmation from the Departmental Office of Human Resources Management in connection with the OGE program review.
The Director, Departmental Ethics Office (DEO), provides the DAEO with the required written confirmation.
NASA had procedures for notifying the DAEO of the ethics notices issued to new employees in place prior to reorganization within NASA's administrative enterprise, however, during calendar year 2021 it was not completely followed, so OGC is working with human resources to reestablish full use of these procedures

Question 15 Table 1

We believed that the required information was being included in all offers (issued by our HR contractor at Interior). However, we recently confirmed that they did not have such information. This was corrected last week (1.27.2022).
USADF established procedures as required by 5 C.F.R. 2638.303 during CY2021.
Agency was not aware of the requirement but has taken steps to ensure that future offers include the information required by 5 C.F.R. 2638.303. The Federal Permitting Improvement Steering Council (Permitting Council) became a permanent agency on November 15, 2021, and as a new agency, it is developing a process for ensuring that offer letters include the required information.
During all of 2021, every candidate for potential employment with the NTSB participated in an ethics intake. Before February 2021, some of the information required by 2638.303 was described in the written materials provided with the tentative offer, and all of the required information was provided during the initial ethics intake. From February 2021 onward, all written offers have included the required information.
Not applicable because no offers of employment were made.
An employee from another unit was covering HR after the previous CHCO left and before the current CHCO was appointed. During that time, an offer letter was sent out without the required language.
Notices of ethical obligations in written offers of employment and for new supervisors are provided by USTR's HR servicing office, the Executive Office of the President - Office of Administration.

Due to the presidential transition, OVP did not include this information in its written offers in 2021, but is currently implementing procedures to include this information in future written offers.
RRB's written offers of employment did not include the required agency statement regarding its commitment to government ethics nor the required statement regarding financial disclosure requirements at the time OGE began its inspection. After OGE raised these issues, RRB revised written procedures and templates to include the required information. RRB provided examples of notices sent to prospective employees while OGE was conducting its inspection. OGE examined the notices and determined that they included all required information.
Only two employees. Last hire was September 2020 and at that time GSA CABS provided no ethics information.
Due to the transition of Administrations, some initial offers of employment provided during the presidential transition may not have included the information required by 5 C.F.R. 2638.303. However, all employees subsequently received the required information after the start of the Administration as part of the employee onboarding process.

Question 16 Table 1

One appointee was confirmed December 16, 2021. Due to holidays and coordinating schedules, he received his briefing on January 14, 2022.
One new leader didn't begin training until after 15 days, due to extra time need to relocate and begin fully duty status.
Our Director received his formal initial ethics briefing within 18 days of his appointment. However, he had received an introductory ethics briefing prior to his appointment.

Question 17 Table 1

The one person who did not receive the initial training in a timely fashion was someone who was converted from a contract employee position to federal employee (FTE). For the last 11 years, all new employees have been new hires (or new political appointees) and there is an internal IET trigger for those types of new employees. In other words, it was a rare oversight, but the IET was provided after a self-assessment revealed the oversight.
Written materials were provided within the 3-month period. In-person training was deferred until a formal training session was offered to a larger group.

<p>For the two employees who received their IET beyond 3 months, scheduling was difficult because they were continually busy handling the more serious agency matters.</p>
<p>The agency was not able to provide training to certain individuals within the 3-month window because of scheduling issues that filers may have had during that period. For the three individuals who have yet to receive IET, 2 left the agency shortly after joining the agency and before they could take/receive training and 1 individual is still unaccounted for and the agency is trying to discern from her and her supervisor why she has not taken the IET that's been made available.</p>
<p>Due to the transition of Administration, 3 employees were not immediately identified as requiring training. They have since been identified and trained.</p>
<p>One part time employee was late due to training availability dates. One full time employee was late because of extenuating personal circumstances.</p>
<p>The employee had scheduling issues, and the Agency was able to offer another session within two weeks of the employee missing the originally scheduled session.</p>
<p>DeCA HR was not able to completely track new employee completion of the new employee orientation program. DeCA changed the training system this year from Skillsoft to The Learning Management System which is supposed to provide automatic reminders to employees and automatic tracking of completion. Additionally, the DeCA GC office will be engaging with HR to ensure that there is an adequate review/tracking process for new employee completion of the orientation (which includes the required IET).</p>
<p>DISA requires ALL new employees to receive initial ethics training. In the past, the Agency mandated newcomer orientation ethics training in person to all employees before they were issued a DISA computer, which allowed us to obtain an extremely high rate of compliance with this requirement. Due to COVID 19 restrictions on gatherings, the Agency has gone to a maximum telework posture, which has resulted in new employee training being conducted via an online video format which users must request to review the material. Unfortunately, this new format resulted in a much lower compliance rate than in previous years. We are proactively working with our HR and training teams to change the procedures to include a more robust tracking requirement, timely/regular supervisor notification and follow up to direct compliance and human resources involvement for potential disciplinary actions for noncompliance. Our office will be regularly following up with the HR and training teams to ensure these measures are appropriately implemented until such time as the problem is resolved. Our policies were adequate for the non-COVID environment, but are now being changed so that there will continue to be a reasonable basis for concluding that the training has been completed in accordance with 5 C.F.R. 2638.310.</p>

6 of the employees who received training outside of the 3 month window are military members assigned to remote locations. They were unable to meet the 90 day deadline due to differences in time zones, the COVID-19 pandemic, and their lack of access to the Agency's Learning Management System. Ethics officials coordinated with HR in those remote locations to ensure that new military members in-process the GC office and receive the training within 90 days of arrival. Additionally, there was one civilian employee who belonged to a unit that was gradually integrated into DTRA in 2021 and he was not timely identified as a new DTRA employee.

Despite regular reminders and follow up notices, approximately 5.8% of employees required to complete IET did so outside the 3-month window and an additional 6.2% did not complete the training. On the other hand, 88% of new entrants did receive Initial Ethics Training within their first three months. We will continue to follow up with those who did not complete the training.

Employees who received training beyond the 3-month requirement did not attend their orientation session and subsequently did not complete the online new entrant training afforded to them. The online training has an automatic notice sent to the employee a week before their 3-month period ends. The 1 employee who did not receive training in 2021 was trained on January 31, 2022.

- Telework/COVID-19/virtual in-process hiccups - Technology issues - Personnel absences and departures in Civilian Personnel Offices caused a gap in notifications/tracking of IET - Training scheduled for December 2021 (within three month requirement) was rescheduled to January 2022 due to ethics counselor illness - TDYs - COVID-19 related delays - Summer turnover caused delays - Communication issues with new employees - HR-related delays (not notifying ethics offices of new hires) - Employee non-compliance

The pandemic continued to hamper timely 2021 initial entry training. Other impediments to timely IET included untimely (or no) HR notification of new employees, employee resignations within 30 days of appointment, seasonal employees on a leave without pay status at certain times of the year, and employees on furlough. Several employees who did not receive IET instead received annual ethics training.

The extended telework environment continues to impact some commands' IET programs including causing delays in new employee notifications and timely tracking of IET completion. Commands are aware of the delinquencies and are working on ensuring the new employees complete their training.

The vast majority of agencies/commands achieved on time completion. However, there are two agencies with large numbers of transient/temporary personnel comprised of substitute school teachers and retail store employees working on sporadic schedules in non-traditional settings. While every effort is made to have these individuals complete the training, access is not always available, resulting in a relatively small percentage of personnel failing to meet this

requirement. DoD will continue to look for ways to improve training delivery to these personnel. The remaining discrepancy relates to an individual who was identified late and delayed in obtaining system access, however, training is scheduled to occur in early 2022.

The Department utilizes an online platform to administer initial ethics training for all employees, as defined in 5 C.F.R. 2638.304(a). The online platform sends each employee multiple automatic notifications at pre-specified intervals to complete initial ethics training during the employee's first 75 days. The Department sends additional reminder emails to the employees who have not completed initial ethics training by the employee's 76th day, and continues to follow up with the employee and management, as necessary. The Department followed these protocols for each employee who received initial ethics training beyond the 3-month requirement and for those employees that have not received initial ethics training as of today.

Some employees left before the end of the calendar year but after the 90 day deadline. Some employees confused the IET requirement with the AET requirement. COVID-19 and telework created delays for onboarding employees, including delays related to obtaining computers and PIV cards and gaining access to the network and learning management system. Other reasons include noncompliance with instructions, delayed notification that new employees had onboarded, and extended leaves and deployments. SGEs were not permitted to conduct Department business until they completed it. Managers continue to follow up with noncompliant employees.

IET tracking/enforcement was maintained by component OCHO offices and not Ethics. Problems identified and new process underway.

Administrative error, e.g., timely receiving HR information and notifying new employees of training, COVID issues, some new employees substituted participation in annual ethics training for IET.

There were glitches in the online Learning Link system through which this training is provided, and DOL ethics officials coordinated with the Office of the Chief Information Officer in an effort to resolve them in order for new employees to complete the training, to the maximum extent possible. Some technical issues remained ongoing to prevent timely completion of training.

When preparing questionnaire, the ethics office learned that automatic notifications and reminders were not sent to new hires in 2021. This same problem was discovered in 2020 and the ethics office believed the problem had been corrected. The ethics office will engage with the Foreign Service Institute(FSI) to ensure a robust notice/reminder system functionality is restored as soon as possible.

Many of the employees who have not received IET were appointed to seasonal, temporary, intermittent, field workers-only, or student trainee positions. Others are identified as being on

unpaid leave, furlough, or suspension, and have limited access to office and IT equipment to complete training remotely due to the COVID-19 pandemic.

At one bureau, some employees were not able to access the online training during the pandemic as they were not issued computers however, they were provided ethics orientation materials some employees are on extended leave and one employee is in a non-duty status. At one bureau, two police officers were at off-site mandatory introductory federal law enforcement training and took initial ethics training upon assuming their duties. Some employees were late in taking the training despite reminders.

Incomplete notification of new entrant status.

Because the EPA ethics program is decentralized, we asked the 100+ DEOs to provide reasons for tardy or incomplete initial ethics training. Here is a summary of why employees did not complete IET timely: employee neglect of the requirement due to workload or inattention, employee error in taking the wrong ethics training course, employees assumed the requirement was inapplicable to them because they transferred from another federal agency, confusion over whether to take the annual ethics training or initial ethics training, did not see the training in Agency's learning management system included as mandatory training (more on that later), military deployment medical leave, and not being reminded by ethics officials, supervisors or the system to take the training. In CY 2021, EPA Ethics focused on the root causes of untimely IET completion. As reflected in our response to #12, EPA Ethics did not previously have a reliable method for tracking new employee training completions or timeliness because DEOs were not receiving effective notifications of new hires. By the end of 2021, however, EPA Ethics had worked with OHR to integrate new hire data into program management tools for ethics officials, which allows us to see retrospectively -- the timeliness of new employee training completion. As we delved further into addressing the timeliness of new employee training, we ascertained that the Agency-wide new employee onboarding program (which is not managed by EPA Ethics) does not effectively notify nor remind new employees about their training requirements and deadlines. We learned that the existing system separates training requirements into four sequential phases: immediate, 30 days, 90 days, 180 days. Because the regulatory deadline for initial ethics training is 3 months, employees are not reminded about it until after they have completed all of their 30-day requirements. The system notifies employees only once about the next phase of training. We are currently exploring options for addressing this shortcoming.

During calendar year 2021, all Commission employees worked remotely. The on-boarding process was adversely affected, particularly with respect to providing new employees with laptops and ensuring they properly were connected to the agency's network. Certain offices thus had difficulty tracking the on-boarding process in a timely manner. As a result, some employees completed the training a few days late, and some offices did not follow-up to ensure its new employees completed the training in a timely manner. When brought to the attention

of the DAEO, the employees who had not timely completed the training completed the training thereafter.

The Office of the DAEO made a mistake and is taking steps to avoid repeating this mistake in the future.

One (1) was a transfer from another center who went on medical leave right after being transferred and being designated a filer completed training in 2022. Five (5) Completed IET late after additional reminders were given. Twelve (12) completed IET late due to a procedural problem that has been corrected. Seven (7) have not yet completed IET and local ethics offices are following this up, including to ensure self-assignment and completion through NASA's online course module in NASA's learning management system.

Two employees did not complete the training until after the three month period. Four employees separated from NARA prior to completing the training. The agency will be following up with those employees who are with the agency and have not yet completed the required training.

The IT program that assigned the computer-based training had a programming glitch. It was not assigning the training to returning rotators/rehired annuitants who had taken the training during their prior NSF appointment. When the error was discovered, the training was manually assigned. This issue has been resolved.

Notification of overdue IET requirements have been sent to both individuals and their supervisors and will be pursued until IET is completed. However, 3 of the 8 employees who have not completed their IET, did complete their annual ethics training in 2021.

A few employees were unable to attend initial ethics training within 90 days of arrival due to other work requirements. For a period, OMB's system did not provide notice of new arrivals to OMB Ethics in a timely basis, leading to shortened notice of the time to complete initial training. Additionally, five employees joined OMB on detail, departed within 90 days, and didn't take initial training. Those employees have not been included in the employees that were required to take initial ethics training. This response also does not include individuals from outside of the United States Government serving at OMB under an Intergovernmental Personnel Assignment Agreement on nonreimbursable details.

Because of COVID, we were not providing live ethics training during orientation class as is our normal practice. Instead, we instructed employees to take an online course we provided within 90 days. We recognized late in the year that our automated tracking system wasn't working as expected, and immediately began following up with those that missed the deadlines individually. There are a handful that we had difficulty reaching, but the majority took the training immediately after being contacted by our office. We have now returned to our normal practice of providing training during orientation class.

<p>That employee failed to attend the agency's required quarterly New Employee Onboarding (NEO) Phase II training. Employee have since received the training. Please note that all new PBGC employees are given the agency Ethics Handbook upon onboarding and may contact an ethics counselor for questions or guidance.</p>
<p>system issues (users had trouble accessing training within the HR system)and accounts were put on hold because HR did not have enough licenses to open accounts for employees.</p>
<p>Employees left the agency prior to 90 days, were and are on active duty, some are on extended leave due to illness, and some died.</p>
<p>All employees receive initial training within the required 3-month period. We usually conduct that training on the first day of in-processing.</p>
<p>As of January 1, 2020, if an employee does not timely complete ethics training, network access is disabled. Access is reinstated only if training is completed. Information Technology (IT) is responsible for disabling access based upon reports generated by TVAs Learning Management System (LMS). New employees are assigned initial ethics training upon hire to be due within 30 days of hire. The new employees are also assigned annual ethics training to be due 365 days after their date of hire. It was discovered in January 2022 that the system is using the latter, annual ethics training date, and not the initial ethics training date when disabling network access. As of January 21, 2022, the controlling date in the IT system has been updated and all ethics training must be due within 90 days.</p>
<p>Two employees were late receiving IET training due to communication lapses by human resources office officials regarding employee promotions.</p>

Question 18 Table 1

<p>MSFC & KSC - Not sure who is responsible for notifying DAEO. All other centers: Course created provided by office under supervision of DAEO.</p>
<p>The Director, Departmental Ethics Office, provides the required written confirmation to the DAEO.</p>

Question 19 Table 1

<p>Both the Chairman and Executive Director positions have been vacant since early 2021. The person carrying out Executive Director duties on an acting capacity did receive his annual training during 2021 (which his permanent position, as a confidential filer, required anyhow).</p>
<p>The agency head at the beginning of CY2021 left within the calendar year (May 2021), therefore not required to have annual training.</p>

Pursuant to section 11(b)(2)(B) of the Inspector General Act of 1978, as amended, the Chairperson of CIGIE is elected from among the Inspector General members of CIGIE and, accordingly, receives his or her initial ethics training from his or her employing agency.
The head of the agency is by statute a Department of Commerce employee so the DOC is responsible for the head of agency's ethics requirements.
Head of Agency not confirmed in CY21. Acting Agency Head did complete annual ethics training.
The acting Director is not new to the Agency (and thus did not have to complete initial ethics training within 90 days) and is not covered by 5 C.F.R. 2638.305(a) because he is not Senate-confirmed nor appointed by the President.
No head of agency

Question 20 Table 1

The 9 confidential filers who did not receive their annual ethics training will receive it during February 2022. We are making changes to the hypotheticals that have been used in past SGE trainings. The 10th confidential filer, a permanent career employee, received his training in 2021.
Six confidential filers left prior to the completion of CY2021,
One SGE was unable to receive training for medical reasons. Three staff members were unable to attend annual training in December 2021, but all three received their ethics training in January 2022 during a make-up session.
5 employees resigned or retired from AFRH. COVID quarantine and/or illness effected the remainder
Due to staffing issues, 7 SGEs did not receive training. We have prepared materials and scheduled the required training for the upcoming board meeting in Mar 2022.
We have over 50 FACA advisory committees that do not all consistently meet or otherwise have staggered appointments. Therefore, it is difficult to capture precise data or to the extant training was required, why it was not taken for specific committee members, however our commitment to ethics training for our committees is seen through our improvement from last year and use of an automated platform to deliver initial and annual training and financial disclosures.
The Agency provided live training to all employees who were in working duty status. However, 8 CFTC employees were on extended absences for a variety of reasons at the end of 2021, including medical absences and extended personal leave. The Agency sent those employees ethics training materials but were unable to provide live training because those 8 employees were not in duty status. Of note, 33 new employees who had taken Initial Ethics Training, and were therefore not required to attend Annual Ethics Training, did in fact take that additional

training of their own volition. Consequently, those employees have not been reflected in the total number of employees required to take AET.

Ten confidential financial disclosure filers (OGE Form 450) had not completed training by the end of the calendar year. Three of those ten have since completed training during the month of January. The remaining seven of the ten filers have been and continue to be on military, maternity or other long term health-related leave. Twelve non-financial disclosure filers had not completed training by the end of the calendar year. Six of those twelve have since completed training during the month of January. The remaining six have been and remain on military, maternity or other long term health-related leave.

Annual ethics training was held on 10/13/2021. We made numerous attempts to have these two filers complete and certify that they attended the annual training. Both filers have since left the agency on 12/31/2021 and 1/3/2022 respectively.

Due to transition of Administration, 1 employee was not immediately identified as requiring training. They have since been identified and have been trained.

The one public and five confidential filer employees who did not complete the annual ethics training are no longer employed with the Agency. The Agency sends a non-completion warning letter to all employees who have not completed training, with an extended deadline. If employees do not complete training by this deadline, a disciplinary letter is sent.

The Director of Marketing's 4 Category Managers failed to complete the required annual training by December 31, 2021. The Category Managers completed the training on January 13, 2022. The GC's office will be engaging with the Sales Directorate to stress the importance and legal requirement to complete the training in a timely manner.

One of our OGE 278 filers passed away unexpectedly in 2021 and so was unable to complete annual ethics training. Of the OGE 450 filers, many left the agency in 2021 and were not replaced. Of the ones that stayed through the end of our training season, only one was unable to complete training due to the press of assignments. The filer did complete the training on January 3rd, 2022 but has been counseled on the importance of completing the training in the calendar year.

One Confidential filer is deployed and one confidential filer is delinquent after many phone calls to the latter's office, staff director, and supervisor. Circumstances relating to the COVID-19 pandemic prevented the remaining two senior leaders from attending live ethics training at the offered time. Those who were unable to attend were provided with a link to complete web-based training. Efforts continue to confirm compliance with the alternate training methods provided for all ten filers.

Despite regular reminders and follow up notices, a small percentage (~1.5%) of employees did not complete the training. We will continue to follow up with those who did not complete the training.

Automated messages are sent to employees who have not satisfied ethics training: 2 weeks prior to due date 1 week prior to due date 3 days prior to due date and 1 day to prior to due date. Due date was extended multiple times to give employees ample opportunity to satisfy their requirement.

- Employee medical leave - Deployment - Scheduling conflicts - Employee/military member failure to respond to multiple requests to take training - Employee/military members left the Air Force prior to completing training - Staffing issues - Administrative oversight - Technology issues - Employee non-compliance

Extended medical and military leaves accounted for a portion of those not trained, as well as OCONUS deployments, and inaccurate accounting. General and Flag officers detailed to joint assignments with other DoD DAEO Agencies file with the Military Department DAEO Agency but are trained at their duty location. Therefore, these individuals are not included in Army Agency training numbers.

In 2021 DON had two Executive Schedule personnel that completed IET vice AET. An Echelon II command reported that they have six OGE 278e filers that have not completed AET however, the ethics counselors are working with their clients to ensure the training is completed as soon as possible. As a decentralized ethics program with geographically diverse commands, extended telework continues to present challenges for the AET program. Issues include access to electronic training and tracking training completion.

OGE 278 Filers Two entities experienced issues in training: One command had senior leader training scheduled, but then cancelled due to emerging operational exigencies and they were unable to be re-scheduled until Jan 2022, at which time it was completed. The other entity experienced an error in their Learning Management System, such that the training was not assigned to a small group of senior personnel. That has been corrected and make-up training is being scheduled. *** OGE 450 Filers Most were due to either extended leave/deployment or difficulties in accessing training due to COVID restrictions, and filers were or will be required to take the training upon return. Others related to issues with learning management systems, which have been or are in the process of being corrected.

Two employees are on extended sick/medical leave. One employee was non-compliant in 2021 and referred for further action.

Discrepancies are as follows: 12 extended medical leave, 3 military leave, 1 administrative leave.

Most employees who did not complete AET were on extended leave. Other reasons include difficulties accessing the learning management system and employee noncompliance despite multiple reminders. SGEs who did not complete it were not permitted to conduct Department business. Managers continue to follow up with noncompliant employees.

Several of these employees are on extended medical leave, suspended from duty, or retired as of end of year. Others have been referred to management for consideration of appropriate action to remedy non-compliance.

HUD: Employees either completed the training after the 12/31/2021 deadline or did not self-certify training completion by the deadline. In an effort to obtain compliance, reminders of the requirement to take Annual Ethics Training were sent to employees and when necessary, non-compliance was brought to the attention of the DAEO and ADAEO to help achieve compliance. There is also a discrepancy because some employees left the agency before the deadline for completion and prior to completing their Annual Ethics Training. _____ OIG: Despite multiple reminder emails sent directly to the employees, 9 employees failed to complete Annual Ethics Training and certify their attendance in the HUD OIG Learning Portal by the December 31, 2021 deadline. 2 of the 9 employees who failed to certify are on extended leave. 5 employees certified their attendance after the December 31, 2021 deadline. The remaining 2 employees had IT problems certifying their attendance and verbally confirmed

Extended leave (e.g., military, bereavement, sick and parental), military deployment, delay in releasing online training modules (DEA), inadvertent administrative errors.

We cannot provide an explanation for approximately 9 employees. However, for the remaining number of employees, they either: separated after filing a report but prior to completing training, they are on extended leave, or they are on annual leave.

96% of PAS officials took annual training.

The discrepancies between the number of employees who were required to receive training and the number of employees who actually received training are attributable to employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status.

Employees who did not receive their required training were on extended medical or family leave, administrative leave, or military duty.

Some employees delayed in completing because of illness/extended leave some employees were granted extensions and completed in January technical difficulties at one bureau delayed launch of confidential training until very late in 2021. Follow-up continues for a small number of employees.

<p>Of the 76 public filers who did not receive training, 40 separated from service or were not required in 2021. The 36 who did not receive training were not able to attend any of the scheduled live/videoconference training sessions due to scheduling constraints. EST did not provide individual training sessions for each of these filers.</p>
<p>Despite reminders, some employees waited until late December to take the training, and then: lost track of time, were unable to access the training or have it recorded as completed, had a death in the family, experienced medical issues, were on use-or-lose, mistakenly thought they had completed the training, or departed the agency prior to taking the training.</p>
<p>One employee did not complete the training because the employee has been out on approved extended sick leave.</p>
<p>One confidential filer was on FMLA leave during Annual Training presentations (Oct thru Nov 21) and has yet to return to work. The seven other employees were student trainees and were inadvertently omitted from December audit (Agency employee list used did not include interns). SOPs updated to include unsalaried employees.</p>
<p>Two employees were on extended medical leave through the end of the year and did not complete annual ethics training. One of the two employees returned at the beginning of calendar year 2022 and completed the 2021 Annual Ethics Training on January 4, 2022.</p>
<p>One employee was not able to complete training until January 2022, but did finally confirm that he had completed.</p>
<p>Of the 13 employees that did not complete annual training, 12 employees went on medical, disability, family, or sick leave through the end of the year before completing annual training. One employee failed to reschedule 2021 annual training after an initial conflict. That employee was directed to complete 2021 annual training in January 2022 and has since completed the training.</p>
<p>Two employees (1 public filer and 1 confidential filer) did not receive annual ethics training by December 31, 2021 because they were out on extended medical leave. They received the ethics training promptly upon their return to work.</p>
<p>Nine SES employees left the Commission before the training. One additional SES employee was on extended leave and did not take the training. With regard to 450 filers, those who did not take the training were either on extended sick leave, military leave, maternity leave, and detailed to another agency.</p>
<p>We are working to get the remaining employees to complete training. Some of these employees have been out of the office for an extended period of time - maternity leave, paternity leave, details.</p>

Two confidential filers who received initial ethics training on 10/8/21, did not complete their additional 2021 annual ethics training until 1/11/22 and 1/22/22 respectively. As of 1/31/22, all confidential filers have completed their 2021 annual ethics training.

One individual (an OGE Form 450 filer) did not take annual ethics training because the person was on maternity leave until CY 2022. The other individual (an OGE-450 filer) has been deployed overseas for active duty until 2022.

b. One 278 filer did not receive annual ethics training until January 2022. Three 278 filers left the positions before receiving annual training. c. 16 OGE Form 450 filers did not receive annual ethics training because they are on extended leave. The 16 OGE Form 450 filers will take the annual ethics training when they return to their duty stations.

In 2021, the IAF had six confidential filers who left the agency prior to receiving Annual Ethics Training.

One confidential filer did not complete annual ethics training by end of December 2021. He completed in early 2022.

Employees that did not complete the training were all non-responsive after being contacted several times.

20(b) - Five completed training in January 2022. 20(c) - Eight employees completed 2021 annual training in January 2022. One employee is on extended leave. NASA has been following up on 24 employees with reminders and clearing up IT connectivity issues so they can complete the training. 13 SGEs did not take training in 2021 but will before their first 2022 meeting.

One public filer was on leave throughout the training period, but completed training early in 2022. One confidential filer joined NARA during the training period, after the majority of the sessions had been held. The confidential filer received initial ethics training.

Note to Response No. 20: Total number of financial disclosure filers who were required to receive annual ethics training in CY2021 is less than the total number of employees required to file financial disclosure reports in CY2021, due to employee separations, retirements and extended medical leave prior to the annual training deadline.

7 OGE 278 filers left the Agency prior to distribution of the annual training materials for CY 2021.

One employee is on extended sick leave because of a serious illness.

The numbers reported above are percentages, rather than numeric counts of individuals who received training. Actual numbers are made available to cleared OGE personnel when required. For the small number of OGE 450 filers who did not complete annual ethics training, the ethics

office is reviewing the individual circumstances and reaching out to the filers and their supervisors to ensure the training is completed.

Two OGE Form 278e employees were unable to complete the annual requirement by December 31, 2021, but these NSC staff members are in the process of completing the training. The discrepancy with OGE Form 450 filers is due to the fact that the individual departed the position before annual training was conducted.

The NTSB requires all agency employees to receive live annual ethics training, with limited exceptions. Four employees were unable to attend live ethics training because of leaves of absence and conflicts with other official duties. Three of those employees received interactive training in 2021. One employee returned to work after extended leave on January 3, 2022, and completed interactive training by January 18, 2022. As of January 18, 2022, all 403 employees have completed 2021 annual ethics training.

Some discrepancy is due to employees being on annual or medical leave, or having separated from the agency before December 31, 2021. Any other outstanding training requirements are being pursued through notifications to the individuals and their supervisors.

Annual training was rolled out later than usual for technical reasons. By 1/31/2022, only one required employee, a confidential filer, has failed to take annual training. Ten employees were on extended or parental leave from the date that annual filing was rolled out through 1/2/2022. These employees will take annual training when they return.

One public filer out on extended family leave and two confidential filers out on extended administrative leave.

4 of our 450 filers did not complete the annual ethics training. 1 of the 4 had departed OSTP prior to OSTP offering the annual ethics training. 2 of our staff members who were not 450 filers but were required to take the annual training did not complete it

5 public filers and 1 non-filer were on leave in 2021 and made up their ethics training via WebEx in January 2022. 1 public filer was on paternity leave in 2021 and will make-up his training during February 2022. 1 public filer was on leave in 2021 and separated in early January 2022. 1 public filer resigned in October 2021 and has been on extended leave since then. He will officially separate in 2022.

The SEC had 4 employees who were unable to complete training in 2021, 2 of these employees were on extended military leave and 2 were on extended medical leave.

2 individuals are on extended sick leave and two individuals completed the training after December 31, 2021 - 1 individual has not been responsive -

Employees were on leave.

<p>One filer did not take the annual ethics training by December 31, 2021 due to being out of the office in advance of upcoming retirement in early January 2022.</p>
<p>A total of 4 personnel out of 297 were unable to attend the annual training sessions offered through October - December 2021 due to conflicting schedules. 5 sessions were scheduled with senior leaders to lead the training, and 2 sessions were scheduled as make-ups. Follow-up with the 4 personnel included sending them training slides and written materials, and individual training sessions in early 2022.</p>
<p>A few field offices ("missions") did not report their 2021 training records (including as it relates to 450 filing status) in time for this questionnaire. Based on the Agency's requirement that 100% of Agency employees complete ethics training each year, the DAEO is confident that a significantly larger number of confidential filers did complete the training requirement.</p>
<p>One 450 filer did not submit a completed confidential financial disclosure or an ethics acknowledgment form. I have, as DAEO, reached out to Speaker Pelosi's office and requested this Commission Member be removed.</p>
<p>Two employees have not yet completed their training. We are working with those employees to ensure they complete the training as soon as possible.</p>
<p>Thirty-three postal 450 filers were sent several reminder emails to complete training but did not do so. The Ethics Office informed postal leadership of these employees' failure to take and record annual ethics training.</p>
<p>One employee, a 450 filer, has been out of the country since late-November 2021 on extended leave tending to a family situation, and, because of the employee's leave location the employee is unable to attend training, or accomplish remote or telework assignments.</p>
<p>COVID disrupted plans that had already been made for ethics training. Our agency set up ethics training by Teams meetings during December 2020 through January 2021. Not all filers attended the training.</p>
<p>Two employees were unable to make annual training sessions when offered but were provided written training materials.</p>

Question 21 Table 1

<p>All training modules include a certification sheet that is collected by USADF's Ethics Office.</p>
<p>Pursuant to 5 C.F.R. 2638.309(a), the DAEO established a supplemental ethics training program, required for all Political Appointees, to be completed after receiving their initial ethics training.</p>
<p>On March 21, 2021, the Agency Head directed that live, leader led, values based training should be the primary training methodology.</p>

DAEO issued additional training requirements memo on 1/28/21.
OIG: OLC Ethics partnered with the Human Capital Management Division, so that OLC Ethics now provides New Employee Ethics Orientation training to onboarding employees on the first day of every pay period.
-5 C.F.R. 2638.303-308: The DAEO established live or virtual ethics training requirements for our SGEs as part of the IAF Board of Directors and Advisory Council annual meeting and for IAFs Personal Service Contractors. In addition, employees who are not required to file 450s or 278s also receive annual ethics training along with the rest of the agency. -5 C.F.R. 2638.309(c): The DAEO requires that our Advisory Council certify annually that they understand and are abiding by the applicable ethics rules. Additionally, the DAEO requires that those staff who could not attend the live Annual Ethics Training certify that they have viewed the recording of the live training.
One center required all civil servants to take training. One center developed and required scientists to complete a specific ethics training course.
DFC Ethics Training policy sets forth that all employees will be asked to attend annual ethics training in the year(s) after their onboarding.
Annual ethics training is required for all employees, including non-covered employees.
The DAEO established a requirement for annual continued education of all Army ethics counselors via OGE webinars or other applicable methods. Other Army officials mandated ethics training for senior official staffs, incoming commanders, government credit card holders, Inspector General personnel, and safety personnel. Some Commands require annual training for 100% of employees Some Commands provide special training for categories such as Aides/XOs, Command Group staff, supervisors, Contracting Officer Representatives and Contract Specialists.
The Department of the Navy DAEO has delegated certain duties to certified ethics counselors. In order to be certified as an ethics counselor, the Department of the Navy attorney must have completed a minimum of eight hours of training in the core ethics/standards of conduct subject areas (e.g., conflicts of interest, financial disclosure, post-Government employment, gifts, use of Government resources, misuse of position, and relations with non-Federal entities). Additionally, certified ethics counselors are required to complete annual recertification training.
The DAEO established ethics counselor training requirements for all ethics officials at the Department of Energy. Each ethics official must complete four hours of ethics training each calendar year, whether it is through the Institute for Ethics in Government or another source that offers training relevant to providing ethics advice and counseling.
The DAEO holds quarterly training meetings required for all DECAs and ECs, and an annual day-long training workshop for all agency ethics officials. The DAEO has given the DECAs authority to require all employees in their components to complete AET. Many DECAs have done so. The ADAEO did so for all components he served as DEC for. One component requires all ethics officials to attend an annual Ethics Bootcamp.
All employees are trained annually, and managers/supervisor receive a separate training in addition.

We provide other seasonal advice based on assessed needs such as March Madness, post-election/extremism matters, working with contractors and holiday gift guidance.
Paid interns and student trainees are not required to file financial disclosure reports, but are required to take new employee and annual ethics training.
In addition to public service is a public trust, conflicts of interest, impartiality, misuse of position, time, and property, gifts between employees, gifts from outside sources, outside activities, and seeking and post-employment, we also covered community service activities, endorsements, anti-nepotism, and the the Hatch Act.
We developed an ethics training geared towards ethics in rulemaking and provided it to all agency staff, as the agency is embarking on multiple rulemakings at present.
Contracting officer's representatives (CORs) receive ethics briefings as part of their periodic COR training. In addition, ethics staff send supplemental guidance and meet with departing senior employees subject to 18 U.S.C. 207(c) to explain post-employment ethics restrictions.
DAEO required all attorneys in the Office of General Counsel to complete AET. Other office heads, e.g., Office of Public Affairs, required their personnel to complete AET.
The Bureau Director required all Bureau employees who worked at the Bureau as of October 1, 2021 to attend annual ethics training, without regard to their status as a OGE Form 278e or 450 filer.
Ethics training is provided to DeCA personnel during various training courses offered at DeCA HQ in Fort Lee, VA. Specifically, ethics training is offered to Store Directors and DeCA store Managers going through training during the course of the year. COVID travel restrictions have significantly reduced training this year, but as the pandemic eases, DeCA GC anticipates full engagement and ethics training for a variety of courses this coming year.
All DISA employees are required to receive annual ethics training. The DoD requires many different types of annual training, so we've required annual ethics training.
DLA continued to develop its leader led, scenario based annual ethics training program, integrating several different technology platforms.
The DAEO required all agency employees to attend live annual ethics training.
The DAEO established a requirement for annual continued education of all Army ethics counselors via OGE webinars or other applicable methods. Other Army officials mandated ethics training for senior official staffs, incoming commanders, government credit card holders, Inspector General personnel, and safety personnel. Some Commands require annual training for 100% of employees Some Commands provide special training for categories such as Aides/XOs, Command Group staff, supervisors, Contracting Officer Representatives and Contract Specialists.
Because of the DoD OIG oversight responsibilities, the Agency Head, with advice and counsel of the DAEO/GC, has determined it critical that all OIG employees receive annual ethics training.
The DAEO established ethics counselor training requirements for all ethics officials at the Department of Energy. Each ethics official must complete four hours of ethics training each calendar year, whether it is through the Institute for Ethics in Government or another source that offers training relevant to providing ethics advice and counseling.

<p>The DAEO holds quarterly training meetings required for all DEC and ECs, and an annual day-long training workshop for all agency ethics officials. The DAEO has given the DEC authority to require all employees in their components to complete AET. Many DEC have done so. The ADAEO did so for all components he served as DEC for. One component requires all ethics officials to attend an annual Ethics Bootcamp.</p>
<p>OIG: OLC Ethics partnered with the Human Capital Management Division, so that OLC Ethics now provides New Employee Ethics Orientation training to onboarding employees on the first day of every pay period.</p>
<p>Many components and offices require all employees to receive ethics training every year regardless of financial disclosure status. DEA: core and senior employees must pass Standards of Conduct test and ethics case study. DEA: retirement seminars. EOUST: Administrative Officers not otherwise Form 450 filers must receive annual ethics training. CRM: overseas employees receive additional ethics training focused on international issues and off duty conduct.</p>
<p>A number of DOI employees were designated to complete annual ethics training under the authority established by 5 C.F.R. Â§ 2638.307(a)(4).</p>
<p>DO/HQ: As a refresher, we required new entrant public filers who onboarded before August 1, 2021 and confidential filers who onboarded before June 1 to attend annual ethics training, in addition to new employee ethics training. Five bureaus require all employees to take annual training, regardless of filing status.</p>
<p>All employees must take annual ethics training.</p>
<p>We provided mandatory post-employment training for outgoing P45 political appointees. For the incoming P46 political appointees, we were asked by the EPA transition team to provide them with a preliminary introduction to their ethics obligations prior to the inauguration.</p>
<p>Agency Policy letter requires all EXIM employees to attend initial and annual ethics training.</p>
<p>The Ethics Office provided live ethics training for the FCA Office of Examinations. The training was one hour in length and targeted newer examiners with fewer years of experience to reinforce their knowledge of the ethical principles, laws, and regulations.</p>
<p>We require all employees to take Annual Ethics Training</p>
<p>All Commission employees not just financial disclosure filers are required to take the Annual Ethics training.</p>
<p>FHFA requires all employees to complete annual ethics training (employees that received initial ethics training that calendar year are exempt).</p>
<p>In anticipation of adding more confidential financial disclosure filers, mediators now receive annual filer training.</p>
<p>Certain groups must receive annual ethics training regardless of their GS-levels and responsibilities (e.g., all staff who work in Commissioner offices). Managers throughout the FTC have also designated certain persons for mandatory annual ethics training based on the nature of their responsibilities, degree of independence, etc.</p>
<p>All GSA employees, including the covered employees above, were required to complete annual ethics training.</p>

All IMLS employees are required to attend annual ethics training.
-5 C.F.R. 2638.303-308: The DAEO established live or virtual ethics training requirements for our SGEs as part of the IAF Board of Directors and Advisory Council annual meeting and for IAFs Personal Service Contractors. In addition, employees who are not required to file 450s or 278s also receive annual ethics training along with the rest of the agency. -5 C.F.R. 2638.309(c): The DAEO requires that our Advisory Council certify annually that they understand and are abiding by the applicable ethics rules. Additionally, the DAEO requires that those staff who could not attend the live Annual Ethics Training certify that they have viewed the recording of the live training.
All employees are trained annually, and managers/supervisor receive a separate training in addition.
One center required all civil servants to take training. One center developed and required scientists to complete a specific ethics training course.
All employees who serve as evaluators for procurements are required to complete a training. In addition, starting in CY 2020 all agency employees were required to complete an annual refresher training course in a number of subjects critical to NARA's mission, including an ethics component. Finally, the Archivist's Management Team - approximately 20 senior officials - receives quarterly ethics briefings and the content of these briefings is usually shared with all other 278 filers.
Annual ethics training was mandatory for all NCUA employees in CY2021, regardless of financial disclosure filer status.
NEH provides annual ethics training to all agency employees, including those not otherwise required by regulation to receive training.
We provide other seasonal advice based on assessed needs such as March Madness, post-election/extremism matters, working with contractors and holiday gift guidance.
It is our practice to send reminders that cover topics that are included in our required Annual Ethics Training to all Agency employees. This approach ensures continuity in our messaging concerning the Standards of Conduct and Criminal Conflict of Interest Statutes. In addition, we give a customized ethics briefing to all participants of the Agency's summer intern program and to all attorneys hired under the Honors Attorney program. Lastly, we provide a comprehensive ethics training to members of an appointee's front office staff and to the employees in the Office of Congressional and Public Affairs (OCPA) to ensure that these employees understand the additional limitations that are placed on appointees under the Biden Ethics Pledge.
Contracting officers as well as IT professionals who work/supervise contractors are required to complete specialized training, "The Government-Contractor Relationship at NSF". In addition to completing IET, new program officers are required to attend a merit review basics course where they receive an additional hour of ethics training geared towards managing their COIs and merit review panel COIs.
In coordination with Agency leadership, the DAEO implemented a new requirement in CY 2021 in an effort to ensure that all Agency employees receive ethics training once every five years. This requirement is designed to provide training beyond just EIT to individuals who do not file financial disclosure forms and thus do not receive annual ethics training. The ethics office

implemented and tracked compliance with the new requirement. In addition, the ethics office launched a new version of the annual ethics training on-line course.
All OGE staff are required to receive annual ethics education.
Overseas staff attending Overseas Staff Training (OST) are required to receive Ethics training focused on ethics issues they may encounter in an overseas environment. New personal services contractor staff at overseas posts are required to review Ethics materials upon entering on duty.
DAEO requires that all Commission employees - even non-filers - receive live in-person ethics training (performed live via WebEx in 2021 due to COVID).
Agency leaders identified other staff in their departments to take training. In total, 130 staff received live ethics training in 2021.
The SEC required mandatory ethics training in 2021 for ALL SEC employees onboard as of Dec 31, 2020. Employees who file a Form 278 received one version of the training and all other SEC employees (including Form 450 filers) received another version of the training. The training was completed during the summer of 2021 and included training on our supplemental regulations. (Employees on boarded on January 1, 2021 or after received mandatory initial ethics training.)
We conducted live training for new hire training and annual ethics training. All SIGAR employee's received live training.
The Board provided annual ethics training for all employees, providing two separate one-hour, virtual and live ethics training sessions for non-filers.
All TVA employees and staff augmentation contractors are required to take annual ethics training. Managed task contractors are not required but are strongly encouraged to take the training.
All employees must complete 60 minutes of live ethics training each year regardless of filer status.
In addition to public service is a public trust, conflicts of interest, impartiality, misuse of position, time, and property, gifts between employees, gifts from outside sources, outside activities, and seeking and post-employment, we also covered community service activities, endorsements, anti-nepotism, and the the Hatch Act.
Notices to new employees Notices to new and existing supervisors on ethics responsibilities Notices to filers about annual training Notices about 278-T and Hatch Act to public filers

Question 22 Table 1

Assessed the content of ethics training instruction during staff assistance visits, reviewed attorney outside practice of law requests to assess conflict of interest and representational violation risks, discussed common and emerging ethics risks with the Inspector General, Chief of Internal Review and Compliance and with the Chief of Management Employee Relations, created an ethics specific email mailbox, and reviewed internal investigations for trends. Ethics counselors attended all staff meetings in some commands and assessed risk based on those meeting topics. Also, Army ethics counselors instruct ethics topics at the incoming quarterly SES

<p>training, and assess the content of ethics training at that session, as well as during quarterly Army ethics telecons with topics based on surveys of Army ethics counselors.</p>
<p>One component discussed ethics concerns with ethics officials in regional offices. One component conducts quarterly risk assessments across the component. Some components pre-screen incoming employees to address ethics concerns in advance of onboarding.</p>
<p>Bimonthly meetings of ethics officials include discussions of pressing ethics issues which are then covered in training. ATF: assessed most relevant risk and dedicated more training to procurement and teaching, speaking, and writing. DEA: coordination of higher risk issues with Office of Compliance. EOUST: post training surveys inform trainings.</p>
<p>Implemented automated one and two-week email reminders for confidential financial disclosure reports that are due to help improve OGE 450 filing timeliness and dedicate staff resources to other ethics matters.</p>
<p>Took into account accelerated schedule for Space Launch System (SLS) progress, lunar Human landing System (HLS) programs and other acquisitions, and commercial partnerships. Also, provided advice related to ethics issues in connection with social justice initiatives and political activity, social media use and telework.</p>
<p>We provide ethics training directed specifically to Acquisition staff and other staff, primarily in the CIO's office, who work the most on high-dollar IT acquisitions. This training includes relatively more training on acquisition-specific topics like the Procurement Integrity Act than regular annual training.</p>
<p>The GC/DAEO meets weekly with agency head. Current ethics issues are addressed during this meeting. The DAEO holds a bi-weekly meeting with the Ethics Program team to address programmatic and policy issues, to include ethics education and communications.</p>
<p>Reviewed advice for common issues (2021).</p>
<p>Terminating IMLS employees meet with an agency ethics official during the exit process. These employees are asked to evaluate the effectiveness of the ethics training received at IMLS and make specific recommendations on changes that they would implement to better serve IMLS employees in carrying out their day-to-day federal/agency ethics responsibilities.</p>
<p>Collaboration with ethics officials from other federal financial regulator agencies on emerging conflicts of interest.</p>
<p>Because there has been an increase in social media activity at the Agency, we provided guidance to Agency leadership (informed by OGE LA 21-09 covering the Mixing of Personal and Official social Media Accounts). In addition, we provided practical guidance to all employees about personal use of social media accounts which included cautions about disclosure of confidential information, avoiding improper endorsements, and ensuring that posts would not violate the Hatch Act. Lastly, because we recognized that a favorable stock market presented a risk that an employee's stock holdings could exceed regulatory exemption thresholds in less time than anticipated, we provided frequent reminders and training on this topic.</p>
<p>The DAEO is part of the agency senior staff (General Counsel), in a small agency, and provides the vast majority of ethics advice to staff. As such, he is aware of issues that have arisen and the ongoing and planned work of the agency.</p>

Regular discussion amongst ethics attorneys and paralegals to evaluate what issues need to be addressed.
OGE New ADAEO Orientation Training included assistance with identification of ethics risks
As part of the Risk Management Internal Controls Program, GC identified risks and documented existing controls to mitigate those risks. Identified risks included failure to identify financial disclosure filers and failure to train employees about the ethics laws and rules. According to the Agency's assessment, the 14 control measures to mitigate those risks were implemented and effective.
The EEOC does not have formal "advice logs." Rather, the team of attorneys who serve as ethics advisor liaison to the agency's field and HQ offices discussed topics about which they receive the most questions and developed a training presentation that focused on those topics, as well as others.
Ethics officials assessed risks to help inform the content of ethics education and communications.
Reviewed questions from employees and guidance to develop examples and training questions.
The DAEO and ADAEO decided to purchase licenses for FDOonline to better manage 450 compliance and ethics training.

Question 23 Table 1

We also conducted a survey this year of annual training participants.
Reorganized filers in FDM sought feedback after ethics training.
Evaluated the effectiveness of interactive training via questions during training followed by emails and/or guidance associated with common issues encountered some commands conducted after action reviews.
Reviewed training surveys provided by organizations responsible for training events in which the Ethics Program team participated. Requested senior executives comment on effectiveness of live ethics training.
Received feedback from employees following ethics training.
Reviewed incoming requests for ethics advice.
One component reviewed questions received after trainings. One component discussed communications and trainings with ethics officials in regional offices. Some offices within one component asked other offices within the same component to review and provide feedback on trainings and communications.

After sending Global electronic guidance on topics including cryptocurrency and holiday gifts, DO/HQ had an influx of follow-up questions, showing that people are reading the guidance and it is effective.
Although we do not currently have a formalized evaluation process, we do gather responses anecdotally from our learners and clients. We anticipate incorporating more formal evaluations in the future.
In-house discussions on high priority issues.
Employee feedback.
All terminating IMLS employees meet with an agency ethics official during the exit process. These employees are asked to evaluate the effectiveness of the ethics training received at IMLS and make specific recommendations on changes that they would implement to better serve IMLS employees in carrying out their federal/agency ethics responsibilities.
My agency requested feedback via email from participants after the required training.
OGE Education and Communications Consultation, May 21, 2021
We inform the training content by current events and issue an annual communication to all employees regarding OGE's conflict of interest prosecution survey.
reviewed feedback about training materials
An interactive training for ethics education is in development per advice from the OGE program review.
Noted the increased questions and requests for advice following training sessions as well as employee feedback following sessions.

Part 5 Additional Comments

23. A self-assessment revealed that a single employee had not received initial ethics training.
Six federal employees who were confidential filers left USADF within CY2021, and an additional employee passed away within CY2021, for the purposes of annual ethics training. Therefore, the 26 confidential filers represent those who worked at USADF throughout CY2021.
Q20: As a result of the Presidential transition, the incumbent Secretary, a public filer, resigned before annual training was provided.
-Q16: Written offers are made by another servicing Agency (Bureau of Fiscal Services)
Q18-- Our General Counsel serves as the DAEO, and that position has been vacant since January 2021. The Chief of the OGC's Ethics Law Division is our ADAEO, and all responses in this

questionnaire directed at the DAEO have therefore been answered by the ADAEO. Q20 - The officers who did not complete the AET in a timely manner generally are those who are on a leave of absence, in quarantine, or in operational environment (typically overseas) where they are unable to complete in a timely manner.

In addition to automating training and disclosure form delivery and submission and creating branded training materials for the first time in the agency's recent history, OGC also began sending out bi-monthly Ethics Newsletters to all agency employees.

#17: Detailees are not included in this response unless they meet the definition of "employee" pursuant to 5 CFR 2638.603. #20(c): The number of employees listed as requiring annual training includes both agency employees and detailees assigned to the agency who file confidential financial disclosure reports with the agency. The number does not include detailees assigned to the agency who filed confidential financial disclosure reports with their detailing agency. Additionally, the number does not include employees who attended annual training but also received IET as reflected in the response to #17.

Referencing Question 22: The Ethics Program additionally provides tailored ethics briefings upon request for certain issues that impact offices and employees within the Agency.

Q.20: General and Flag Officers detailed to joint assignments with other DoD DAEO Agencies file with the Military Department but are trained by at their duty location. Therefore, these individuals are not included in the Department of the Navy's training numbers.

In the pandemic environment, ethics presentations are provided through video and audio communications platforms which include polling and survey functions used for interactive participation.

Q16 - DoD requires that PAS officials receive their initial briefing within seven days of commencing service.

Q17: The significant decrease in IET numbers from 2020 is because SGEs that were expected to serve less than 60 days on a board, commission, or committee are no longer included in this response. Q20: At least 32,000 employees completed AET who were not required by regulation to do so.

Q15. CRM: HR was not following established process. Will work with HR to comply.

#16 Many other PAS officials were confirmed and appointed in the second half of December. All received their ethics briefing in a timely fashion. #18. Written confirmation not required because IET course was developed by ethics office and is available online. Going forward however, the ethics office will seek written confirmation that regimen for notifying new employees of IET is implemented correctly. #20c. The data for confidential filers includes individuals who left a filing position after submitting an annual report. Typically, there are several hundred OGE-450 filers who leave the Department, change positions, or change duties by the end of any given year and are no longer in a filing position. #23 Based on review of training statistics, ethics office added new position to bolster efforts, to notify and remind filers of training obligations.

Question #16: Please note that the Department reported ten agency leaders, as defined in 5 C.F.R. 2638.305(a), were required to receive ethics briefings by December 31, 2021. This total

included one PAS official who was appointed on January 14, 2021 during the prior administration and terminated service on January 20, 2021.
Q19: The Secretary received required new entrant/initial ethics training, and we also provided an annual briefing as a refresher. Q22: Some bureaus did not assess risk. Q23: Some bureaus did not evaluate effectiveness of ethics education.
#17 Total number does not include student interns which 13 of 15 received initial ethics training within 3 months. #22 Held several targeted ethics training to more narrowly address inherent risk in their respective offices.
Question 20: An additional 1,062 employees who were not required to receive annual ethics training voluntarily completed annual ethics training.
#23 Ethics staff meet regularly to discuss significant developments, trends and issues that should be added to our annual ethics training, in addition to sending periodic ethics announcements
Q. 20 Some NASA Directorates or subdivisions required additional employees to take annual ethics training. Additional information -- In addition to the Annual Ethics Training for NASA Employees, attorneys provided several training sessions on New Supervisor Training, Pathways Interns Ethics Training, Hatch Act trainings with content on social media, telework, and social justice initiatives, senior leadership training on working with contractors, impartiality training and covered relationships when hiring contractors, and ethics for administrative officers.
Question 16: This information is classified Question 17: All employees receive initial ethics training with their initial orientation training in the first week at NGA. Question 20: All covered employees received ethics training in 2021
20d. NLRB Supervisors and Managers who are not financial disclosure filers are directed by leadership to complete the online version of the Annual Ethics Training by January 31st of each year.
Question 17: We require everyone who serves as an employee to receive initial ethics training. We met with employees during their orientation to discuss initial ethics training, financial disclosure, annual ethics training, and the advice program. Question 23: We continue to assess our training needs. As part of our efforts in 2022, we will continue discussion with agency leaders and employees about developing targeted training to cover any areas that may benefit from additional education. We also use the agency's internal web portal to post information about emerging issues.
Q16: OVP does not have any agency leaders as defined by 5 CFR 2638.305(a). Q17: OVP provides initial ethics training to all OVP staff, including OVP Senate employees, detailees and assigned personnel from other agencies. Q20: OVP requires all employees to participate in annual ethics training, including OVP Senate employees, detailees and assigned personnel from other agencies.
Ethics officials publish Ethics Dispatches to highlight ethics issues that may be of interest to agency employees and are timed to occur during the year when certain ethics issues might arise (e.g., gift rules during the holiday season, Hatch Act during elections seasons, etc.). New issues are circulated to the entire agency on a quarterly basis.

#23- DAEO discussed Ethics Office training opportunities at Senior Staff meetings including advertising Virtual Coffee Break ethics trainings that were presented once a month by ethics staff on key topics of interest as well as offering to create Ethics presentations designed and presented to individual agency divisions/offices as needed. Several offices requested and received such personalized training. These trainings were presented live on WebEx. Ethics officials discussed recurring questions received by the Office and created Virtual Coffee Break ethics training based on this feedback. Additionally, the Ethics Office publishes weekly Ethics Bulletins covering ethics issues that are generating numerous questions to ethics staff.

Question 17 (cont.): In addition, the employees who are past due have had their training reassigned to be due no later than March 1, 2022. Of the 39 who have not taken training: 3 were employed by TVA as interns for less than 90 days. 33 are temporary hires who are high school students and employed less than one year. 3 are employees who had training assigned but access was not revoked due to the issue described above the training has been reassigned and their training is due by March 1, 2022.

Q15: Due to the presidential transition, some initial written offers did not include this information, however, the information was subsequently provided to all employees who did not receive it in an initial written offer. Q16: This number reflects the only new agency leader as defined in 5 C.F.R. 2638.305(a) in 2021, the National Cyber Director. WHO supported the Office of the National Cyber Director as the agency stood up operations in 2021 and accordingly, provided the Director with an ethics briefing.

Question 26 Table 1

The CIA does not provide copies of waivers because the substance of those waivers is classified and/or the information is protected by Section 6 of the CIA Act of 1949. The single waiver granted was discussed with OGE for consultation prior to approval.

For one component, waivers are sent to OGE on a quarterly basis, thus the number of waivers sent in FY21 includes those from Q4 of FY20 and Q1 – Q3 of 2021.

Additional Comments Part 6

Question 24, Section 2: Auditors are also subject to the independence standards of Generally Accepted Government Auditing Standards (GAGAS), which are incorporated into the DCAA Contract Audit Manual (CAM) Chapter 2. Independence is very closely aligned with the Impartiality standard. As a result, when performing independence analysis, the Ethics Office also applies impartiality standards. However, unlike agency determination that may be available for the impartiality standards, agency determination is available for independence. Independence is either subject to application of safeguards (which may include recusal) or they are not.

Q.26 The reported numbers include only those waivers granted in 2021 that were sent to OGE. It does not include draft waivers sent to OGE for consultation in 2021 that have not yet been issued.

Q24: For DO and a couple of bureaus, conflicts of interest rank in the top two categories.

#24 Reduced travel due to COVID has resulted in reduction of gifts

#24 Seeking Employment

#25 - Only one (1) filer terminated due to retirement

Q26: One employee was granted a 208(b)(1) waiver to work on COVID pandemic response. A copy of his waiver was sent to OGE and is also available on the White House website.

Question 27a Table 1

The agency's "HR office" does not make the determination about which new employees will be required to file public or confidential reports. The DAEO makes that determination. Generally, however, SES and PAS positions will require public reports and GS-15 positions (in most circumstances) will require confidential reports.

The DAEO is also the person that coordinates with Department of the Interior for the initiation of all personnel actions including hiring, retirements, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date. Also, there are only three public filer positions at the agency (the DAEO one and the ones for Chairman and Executive Directors, both of which have been vacant since early 2021).

Did not hire any new staff in 2021.

Because the Access Board is a micro-agency with only 28 FTE, there is generally no need for the HR staff to formally notify the DAEO or other agency ethics officers about new appointments. The agency is small enough that all staff know when a new employee comes on board. Additionally, the agency only has two public filers, the executive director and the DAEO therefore, it is readily known to the DAEO when either of these positions are vacated and filled.

USARC had no such appointments

Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.

No new appointments.

<p>The CSB is a micro-agency of 33 employees, currently. During the course of the last year, there was one new appointment/new hire to a public financial disclosure filing position. The HR office timely informs all staff when there will be any new appointment. The ADAEO learned of the new appointment from such an announcement.</p>
<p>The CFA does not have a Human Resources Office.</p>
<p>DRA was without a federal member from January 20, 2021 to late November 2021.</p>
<p>The DAEO is the only public filer.</p>
<p>Public and confidential financial disclosure filer positions are determined by the Office of Ethics according to title and grade IAW Agency policy. The Office of Human Capital does notify the agency ethics officials of all new hires within 15 days.</p>
<p>We did not have any new appointments</p>
<p>In 2021 the IAF President/CEO was appointed by the President to a position at another agency. The President/CEO notified senior management including the head of human resources (COO) and the DAEO at the same time. At the same time, senior management, including the DAEO was also informed that the COO would move to interim IAF President/CEO and thus become a public filer.</p>
<p>JUSFC is a small agency of 4 FTEs with no internal HR Office. We contract HR services from GSA. We are a low turnover agency and there were no new filing positions in 2021.</p>
<p>No such appointments.</p>
<p>There were no new public filer employees hired in 2021.</p>
<p>No new appointments for Public Filers in 2021.</p>
<p>We had no new hires to public filing positions.</p>
<p>No new employees hired.</p>
<p>During CY 2021, there were no appointments at IPEC to public financial disclosure filing positions. And, IPEC does not have a separate HR office.</p>
<p>PBRB is too small as discussed above.</p>
<p>GSA CABS does not make any recommendations or notifications of ethics related issues or need/requirement to file the 450 or 278. GSA CABS does not provide any training or intro to ethics as part of their onboarding. There were no new hires in 2021.</p>
<p>The Ethics Office pulls a report from the Human Resources database every week.</p>

Question 27a Table 2

All public filers and appointments were ID'd to the DAEO by other means. We are working with our human resources office to further clarify the written procedures they follow in order to ensure timely notification of all appointments to public and confidential financial disclosure filing positions.
- HR offices do not track/are not reporting new filers - Administrative oversight - Civilian Personnel Office provides information that is inaccurate and unusable - HR declined to provide notification - Relied on supervisors vs. HR
FHFA's HR did not have a formal system for alerting the Ethics Office of promotions (notices re: new employees and departing employees are standard). HR has recently updated their procedures and put a process in place to notify the Ethics Office every 2 weeks of all promotions.
Human Resources did not notify the reclassification of two SL positions.

Question 27b Table 1

No new appointments were made for this category in 2021.
The DAEO is also the person that coordinates with Department of the Interior for the initiation of all personnel actions including hiring, retirements, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date.
No new appointments to confidential filer positions were made in 2021.
No new appointments of confidential filers.
Did not hire any new staff in 2021.
Same response as to Question #27(a). The DAEO is well aware when any of these confidential filer positions are vacated and filled.
USARC had no such appointments
Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No confidential filers.
The CSB is a micro-agency of 33 employees, currently. During the course of the last year, there were two new appointments/new hires to confidential financial disclosure filing positions. The HR office timely informs all staff when there will be any new appointment. The ADAEO learned of both appointments from such an announcement.

CFA does not have a Human Resources Office.
HR doesn't appoint OGE 450 filers. This decision is made by the employee's supervisor utilizing the Confidential Filers Job Aid, with consultation with GC at the supervisor's discretion. Due to reorganizations and reassignments, the list of positions that file OGE 450s is malleable. All DISA Contracting Officer Representatives are required to file 450s, other positions are at supervisory discretion.
Don't have any
The DAEO is the general counsel and is involved in all hiring actions. No notification is needed.
Public and confidential financial disclosure filer positions are determined by the Office of Ethics according to title and grade IAW Agency policy. The Office of Human Capital does notify the agency ethics officials of all new hires within 15 days.
No confidential filers hired in CY 2021.
We have no confidential filers
No confidential filers
No such appointments.
There were no new confidential filers hired in 2021.
No confidential filers
None appointed.
No new appointments to confidential financial disclosure filing positions in 2021.
No new employees
During CY 2021, there were no appointments at IPEC to confidential financial disclosure filing positions. And, IPEC does not have a separate HR office.
no appointments were made in 2021.
The RRB had no new appointments of confidential filers in 2021.;All confidential filers and appointments were ID'd to the DAEO by other means
No new OGE 450 filers joined the Agency during CY 2021.

GSA CABS does not make any recommendations or notifications of ethics related issues or need/requirement to file the 450 or 278. GSA CABS does not provide any training or intro to ethics as part of their onboarding. There were no new hires in 2021.

The Ethics Office pulls a report from the Human Resources database every week.

Question 27b Table 2

- HR offices do not track/are not reporting new filers - Administrative oversight - Civilian Personnel Office provides information that is inaccurate and unusable - HR declined to provide notification - Relied on supervisors vs. HR

Some Army organizations experience individual HR office reluctance to comply with, or ignorance of, the OGE/DoD/Army directive to provide this information to relevant ethics offices. But a large number of Army ethics offices receive excellent HR cooperation. The Army continues to work on improved communication with its HR offices.

The Department of the Navy has a decentralized ethics program and commands establish different procedures for identifying new entrant OGE 450 filers. For example, some commands rely on the check-in process to identify potential OGE 450 filers, while others pull gain/loss reports from a workforce management system and then work directly with the new employee's supervisor.

HR provides lists of new employees to ethics officials but does not have all the information and knowledge to identify all financial disclosure filers. Additionally, confidential financial disclosure is decentralized at DOJ. New confidential filers are more often identified within components, such as by supervisory personnel and ethics officials.

As addressed in our responses to #12 and #17, EPA Ethics and DEOs had not previously been receiving information about new hires. At the end of 2021, we integrated new hire information with ethics tracking, but are still working on solving the systemic problem of DEOs not always being directly involved in designating e450 filing positions prior to hiring. We are working on a solution in partnership with OHR.

FHFA's HR did not have a formal system for alerting the Ethics Office of promotions (notices re: new employees and departing employees are standard). HR has recently updated their procedures and put a process in place to notify the Ethics Office every 2 weeks of all promotions.

As noted above for public filers, the Peace Corps Ethics Program was notified with lists of new employees and monthly staffing reports but not always within the 15-day deadline for staff moving internally into filing positions.;The Peace Corps Ethics Program was notified with lists of

new employees and monthly staffing reports but not always within the 15-day deadline for staff moving internally into filing positions.

The ethics office learned in late 2021 that there was confusion in the Agency's bureaus, offices, and missions as to which office(s) was responsible for keeping a list of 450-filer positions. We have since clarified and corrected that issue. Additionally, missions were performing hiring of local staff outside the purview of USAID's central HR office. This too is an issue we've clarified and corrected.

Due to the transition of Administration, confidential filers were not immediately identified. They have since been identified and have filed OGE 450 forms.

The DFAS Human Resources System does not have the technical capacity to track new employees who are assigned to or hired into positions requiring the filing of an OGE 450. An attempt was made to provide the ethics office with a monthly list of all OGE 450 filers in hopes that this would include new entrants but this proved to be too cumbersome. Further, DFAS has a number of OGE 450 filers, Contracting Officer's Representatives, for whom the duties that require filing are collateral assignments and are not inherent in the position. To adjust for the ethics office works with the organizations in which have filers to ensure that we receive timely notice of new entrant OGE 450 filers.

DIA's Human Resources office has not volunteered information on positions designated as 450 filing positions, however, the ethics program has recently engaged with its HR partners and is now receiving this information on a monthly basis. Note: Historically, the ethics program has issued periodic agency-wide taskers in order to obtain updated data on positions and employees that meet the criteria for OGE 450 filing.

Question 28 Table 1

There were no terminations from public financial disclosure filing positions in 2021.

The DAEO is also the person that coordinates with Department of the Interior for the initiation of all personnel actions including hiring, retirements, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date.

No employees departed the agency in 2021.

As explained in the response to Question #27, the only public filers are the DAEO and the Executive Director. Therefore, the DAEO is personally aware of either of these staff departures and a formal notification from HR is not necessary.

USARC has no such terminations

Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No terminations.
There were no terminations from public financial disclosure filing positions in 2021.
CFA does not have a Human Resources Office.
No terminations in 2021
No Public Financial Disclosure Report filers left federal service in 2021.
We did not have any terminations
In 2021 the IAF President/CEO was appointed by the President to a position at another agency. The President/CEO notified senior management including the head of human resources (COO) and the DAEO at the same time.
No terminations
JUSFC is a small agency of 4 FTEs with no internal HR Office. We contract HR services from GSA. We are a low turnover agency and there were no terminations in 2021.
No such terminations.
There were no public filer terminations in 2021.
No Terminations
We did not have any terminations from public filing positions.
No employees terminated.
During CY 2021, there was one termination from a public financial disclosure filing position. The DAEO was fully aware of when the termination would occur. And, IPEC does not have a separate HR office.
PBRB is too small, as discussed above.
The only public financial disclosure terminations were for the 3 political appointees in the Agency. The DAEO was aware that these employee would be leaving the Agency due to the change in Administrations, and so there was no need for HR to notify the DAEO.
GSA CABS does not know anything about who at our Agency is a non-filer, 450 filer or a 278 filer. The DAEO would track this independently of the HR office (GSA CABS).

The Ethics Office pulls a report from the Human Resources database every week. We also receive announcements of the appointment of new officers

Question 28 Table 2

<p>In such cases in which the DAEO was not notified this was primarily due to the Office of Human Resources reorganization and confusion about their responsibilities. We are seeking to improve communication between the Office of Human Resources and our office.</p>
<p>- HR does not track and/or has taken the position that it is not their responsibility - Filers contact Ethics Counselors directly to inform he/she of his/her termination - One Air Force has developed its own tracking system and provides the information to HR - Attorneys track the requirement, not HR</p>
<p>HR is not uniformly relied on for this information/notification. Public filers are trained to receive post-government employment ethics briefings, advice, and guidance before they leave and know to contact ethics officials when leaving. Therefore, ethics officials most often become aware of their termination prior to their departure. Ethics briefing is a mandatory item on outboarding checklists.</p>
<p>HR has set up a checklist for the separating filer that puts the responsibility on the filer to contact the ethics team regarding financial disclosure requirements.</p>
<p>The DAEO is the only public filer.</p>
<p>The Peace Corps Ethics Program was not consistently notified by HR within the 15-day deadline for terminations of public financial disclosure filing positions. We usually learn of staff terminations once the leaving staff member begins completing the agency's exit form.;The Peace Corps Ethics Program was not consistently notified by HR within the 15-day deadline for terminations from public financial disclosure filing positions. We usually learn of staff terminations once the leaving staff member begins completing the agency's exit form.</p>
<p>Generally, terminations from public financial disclosure filing positions were ID'd to the DAEO by other means. However, one Schedule C employee was converted to a non-Schedule C excepted service appointment during 2021 and was required to file a termination report. Agency ethics staff were not timely notified of the conversion, and did not become aware of the need for a termination report until January 11, 2022._ We are working with our human resources office to further clarify the written procedures they follow in order to ensure timely notification of all terminations from public financial disclosure filing positions.</p>

Question 29 Table 1

Financial Disclosure Management (FDM)
Electronic 450 ("E-450") system developed by internal IT staff
CIA's e-filing system.
FDonline
FD Online
The CFTC uses the Ethics Management and Tracking System ("EMAT").
FDonline
FDonline
FDonline
Financial Disclosure Management System
Only Integrity for OGE 278 Filers
The U.S. Army's Financial Disclosure Management (FDM) system.
DoD Financial Disclosure Management (FDM) for Confidential Financial Disclosure Reports only.
Financial Disclosure Management (FDM)
Financial Disclosure Management hosted by US ARMY. https://www.fdm.army.mil
The U.S. Army's Financial Disclosure Management (FDM) program.
Financial Disclosure Management System (FDM)
FDonline
FDONLINE for our Confidential Financial Disclosures
Army's Financial Disclosure Management System
Financial Disclosure Management (FDM)
Department of Defense-Department of the Army's Financial Disclosure Management System (FDM)
Financial Disclosure Management (FDM)
Financial Disclosure Management (FDM) System

FDonline
1. Electronic Financial Disclosure System (EFDS) 2. NIH: NIH Enterprise Ethics System (NEES) 3. CDC: Ethics Program Activity Tracking System (EPATS) and 4. CMS: CATS
FDonline, Army FDM and CBP's HRBE OGE 450 e-filing systems.
FDonline
Confidential financial disclosure: FDonline (BOP) and internal systems (ATF and USMS).
Department of Army Financial Disclosure Management System (FDM)
FDonline for confidential financial disclosures (OGE Form 450)
FDonline
Internally developed systems at DO/HQ + 4 bureaus (OGE 450 filing via Ethics database disclosure (Salesforce application + Ethics Management System e-filing created in Sharepoint.))
Army Financial Data Management System
For the confidential financial disclosure reports, EPA Ethics designed its own e450 system built in EPA's business automation platform (BAP) with Salesforce.
FDonline (Intelliworx)
The FCA and FCSIC use an FCA SharePoint site to host an OGE 450 fillable form and a Conflicts of Interest Certification Form.
The FCA and FCSIC use an FCA SharePoint site to host the Conflicts of Interest Certification Forms. This same site also hosts a fillable OGE Form 450. However, at this time the FCSIC does not employ OGE Form 450 filers.
FHD
FDonline
Intelliworx/FDonline
Filers either mail or email their Forms 450 to the Office of the DAEO, which saves those Forms on the agency's internal computer systems.
Internal system used for 450 filers.
FDonline.

The Agency created an electronic OGE Form 450 system.
FDonline electronic filing system
NASA uses an electronic financial disclosure filing system called Ethics Program Tracking System (EPTS) as well as an electronic system for self-certification of conflicts called NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES).
NCUA uses the Army's FDM e-filing system.
FDonline
FDM for OGE450s
FDonline
NSF eFile
In addition to Integrity, NSA uses its internal Financial Disclosure Reporting System (FDRS).
FDonline
Ethics Gateway
Army FDM system
OMB uses an online system developed internally for completion, review, and storage of 450 filings.
CIA's electronic system
Financial Disclosure Management (FDM)
FDonline for 450 filings.
Confidential Filer Disclosure System (CFDS)
FDonline
FDonline
ARMY Financial Disclosure Management for 450 filers
FDonline
Financial Disclosure Management System (FDM): https://www.fdm.army.mil
DocuSign

We only used Integrity in 2021. However, we purchased licenses for FDOonline in the fall of 21/FY22 for use in the 2022 calendar year for 450 submissions.

Financial Disclosure System (FDS)

FDOonline/HRWorx

Part 7 Additional Comments

Q32: We received three paper OGE form 450s from employees who could not access the internal e-450 system for one reason or another.

All questions in part 7 - Our General Counsel serves as the DAEO, and that position has been vacant since January 2021. The Chief of the OGC's Ethics Law Division is our ADAEO, and all responses in this questionnaire directed at the DAEO have therefore been answered by the ADAEO. Question 28 - The answer is "in most cases" for public filers because there is the care occurrence where senior officers received the appointment outside the typical promotion process. Q 32 - Numbers are classified unless included.

Only the DAEO files on Integrity.

Question 32: Due to technical issues, two OGE-450 filers submitted their reports via email. Additionally, there were seven (7) Public filers whose reports were due after fiscal year 2021.

All OGE 278 Filers file in Integrity.

Question 31b: As the Department of Defense (DoD) Executive Agent for the FDM filing system, the Department of the Army fully funds FDM for all DoD agencies from Army appropriations.

Regarding Question 27: DIA's Human Resources office has not volunteered information on positions designated as 450 filing positions, however, the ethics program has recently engaged with its HR partners and is now receiving this information on a monthly basis. Note: Historically, the ethics program has issued periodic agency-wide taskers in order to obtain updated data on positions and employees that meet the criteria for OGE 450 filing.

Costs regarding the 24 remaining federal agencies serviced by FDM will be sent separately to OGE, Ms. Pond.

Q32.a: The DON AEQ for CY20 inadvertently included Integrity filers.

Q27-28 Most agencies/commands reported that they receive in all or most instances. For those few reporting never or N/A, the ethics office tracked or utilized another system/office to track.

Q27 & 28: HR does not notify the DAEO of onboarding political appointees. The DAEO is notified of these new public filers by the White House Liaison's Office. Q31: Components with legacy filing systems do not break down costs between report types, so all costs are reported as confidential. Additionally, most of our component offices do not break out costs for maintaining an electronic filing system and report lump sums. When that is the case, we have reported them as an amount paid to a Federal agency. One component with a legacy filing system received a two-year obligation for \$2,317,000 for capital improvements to its legacy filing system. The full amount of the obligation is being reported here, although it will continue to be spent during FY2022.

Q31. ATF: 2 part time FTEs and 1 part time contractor support

Q32: Numbers reported may reflect calendar year for some bureaus.

#32 All agency public filers use Integrity.

Question #32: The number of OGE Form 450 filed in 2021 is 59, and the number of Conflicts of Interest Certification Form filed is 10. The Conflicts of Interest Certification Forms are collected from incumbents every three years. Last year, the Conflicts of Interest Certification Form was collected from certain new entrants that were not OGE Form 278e or OGE Form 450 filers.

Question #32: The FCSIC does not currently employ any Confidential Financial Disclosure Filers, OGE Form 450. However, three FCSIC employees file the Conflicts of Interest Certification Form, which are collected from incumbents every three years and certain new entrants when they enter on duty. In 2021, incumbent filers were not required to file the Conflicts of Interest Certification Form and no new entrants entered on duty. Incumbents will file again in 2023.

Questions 32 & 39: Please note only 4,419 were required to file in 2021 as 31 of those who filed had due dates in 2022.

Question 32: Filers either mail or email their Forms 450 to the Office of the DAEO, which saves those Forms on the agency's internal computer systems.

Q32- not applicable since the agency's public filers all use Integrity, and the agency's confidential filers do not file electronically but by paper.

32b. This number includes annual and new entrant filers.

Q. 31 NASA does not separate the operating costs between Confidential (450) and Public reports. This is the amount for operating NASA's EPTS system. The self-certification portion of the NSPIRES is not separated from the overall operating cost of the NSPIRES system.

Question 32b: This information is classified.

27. We are notified by Office of Human Resources (OHR) about individuals who have been hired or promoted to a filing position within each pay period. However, the Ethics Office is not always notified about assignments to acting positions within 15 days. When this occurs, we communicate with these individuals as soon as we are aware of the assignment and proactively issue extensions and offer assistance so that we can prioritize the completion of the report within reporting timelines.

Question 32: The numbers reported above are percentages, rather than the numeric counts of filers. Actual numbers are made available to cleared OGE personnel when required. The Agency uses Integrity only for the three NSA filers whose forms are required to be certified by OGE.

Question 32: We began assigning confidential financial disclosure reports after December 15, 2021. The first new entrant report was filed in 2022.

32. This includes one filer who filed in advance of their 2022 due date.

Question 33 Table 1

As a result of the Presidential transition, the incumbent Secretary resigned in early 2021. The new administration appointed a new Secretary in late September, but a few days thereafter he indicated his intent to resign. His resignation took effect a few weeks later. In the circumstances the DAEO did not require him to submit a public financial disclosure.

One filer whose new entrant report was required to be filed by 11/24/2021, was given a 47-day extension until 1/10/2022. Another filer was required to file her report on 1/5/2022, however, the report was filed on 12/21/2021. That report was counted.

One filer refused or failed to file a termination report. That person has been referred to DOJ (as of January 2022) in accordance with OGE regulations.

The ethics program experienced difficulty getting in touch with two filers who had terminated employment with DIA without having filed, and in getting responses from three new entrants, despite multiple attempts to notify the new entrant filers of their overdue assignments. The ethics program will continue to engage the individuals until they all successfully complete their reports.

- One filer retired on 30 Nov 21 and requested/received a 30-day extension of his termination OFE Form 278e - Ethics office was not notified in time - Some filers PCS'd (Permanent Change of Station) to installation but were not assigned reports in time/ethics office assumed they filed at their previous installation so reports were not assigned

Department of the Navy is tracking two outstanding OGE 278e termination reports for Career SES'ers who left the DON prior to completing their termination reports. Ethics counselors are in

actively working on ensuring these individuals complete their reports. One new entrant report is still pending submission. The ethics counselor is working with the filer to ensure it is submitted.

Most discrepancies appear to be related to test reports used by ethics officials for training purposes and reports with due dates extended to 2022.

Two new entrant Schedule C employees are non compliant. One Schedule C employee filed after the deadline in 2021 but filed early in 2022 prior to owing late fee

One component is working with one annual filer to submit a paper report. The Department is still trying to obtain the termination and combination reports of three filers who have departed.

A political appointee who left DHS in January 2021 was identified during the financial disclosure mid-year scrub of filers. The individual was misidentified as a career SES in Integrity, and so he was not assigned a termination report along with the other political appointees transitioning out in January. ELD requested contact information for him from our OCHCO but they did not have any. ELD then tried to do a public search for the individual to identify contact information, to no avail. ELD is requesting OCHCO assistance again to get contact information.

Working with filer to complete filing.

Collection efforts underway for missing reports.

Termination filers did not submit terminations reports, agency followed up via emails and no response. New Entrant filers - appointed in December 2021 - had not submitted report by 12/31/2021

The discrepancy between the number of reports required to be filed and the actual number of reports filed was the result of an error in tracking and assignment, as well as difficulties experienced in obtaining a required report from an employee in extended leave status during the calendar year.

An employee acting in an SES position for more than 60 days did not file promptly after notification but after being appointed to SES in late December filed in early January.

One career and one non-career termination reports have not been received. We are continuing to follow-up with these filers. The annual filer who refused to complete a report was reported to the Department of Justice, which has pursued civil action.

Three former employees never filed their termination reports despite receiving reminders. We have not yet received two new entrant reports.

Two people filed New Entrant 278 reports in December 2020 and therefore did not file again in 2021.

Some filers may not have been aware of the requirement to file a new entrant report or a termination report. Furthermore, it appears that a filer may have erroneously submitted an annual report in lieu of a termination report, and another filer may have erroneously submitted OGE Form 278-T as a new entrant report. The Permitting Council became a permanent agency on November 15, 2021, and as a new agency, it is developing a process to ensure that all filers complete their reports in a timely manner.

Included in the total required numbers are the 2 PAS termination reports filed in OGE's Integrity system and 2 Annual reports filed in OGE's Integrity system. Six have not filed 278e forms. Two sent back for more information and have been notified to resign the forms per a local legacy practice. For the Termination report, NASA requested information to determine if the annual filing can be converted to a combination termination report. The combination filer did not submit a report before being incarcerated. Two annual filers completed their annual reports in 2022.

The numbers reported are percentages, rather than numeric counts of filers. Actual numbers are made available to cleared OGE personnel when required.

Career SES retired and failed to file Termination 278.

One filer did not file a termination report.

One Schedule C employee was converted to a non-Schedule C excepted service appointment during 2021 and was required to file a termination report. Agency ethics staff were not timely notified of the conversion, and did not become aware of the need for a termination report until January 11, 2022. The terminated filer was notified of the filing requirement on January 12, 2022 and was asked to complete the report within 30 days.

Employees died or no longer communicate with agency.

We are still in the process of obtaining the termination report for a former Schedule C employee who had worked in our public affairs office.

Two new entrant reports and two termination reports that were due before December 31, 2021 were not received by December 31, 2021. USPS OIG officials are in contact with those filers.

One of the termination reports is now no longer needed - employee stayed with agency. The PAS is now filing using electronic form.

Three individuals required to file recently began employment at the end of 2021 and received an extension to file their reports, they are in the process of filing their reports in 2022.

Question 34 Table 1

Errors occurred in preparing the report, for the person who was to fill out the report, causing delays. After, the errors were recognized, and corrected, reporting required more than 60 days.

competing priorities/heavy workload

A few reports were very complex and required time for the reviewing official to acquire additional information from and/or discuss with the filer regarding the disclosures made in their report.

Scheduling challenges and the unprecedented growth of the agency caused minor lapses in timeliness. The ethics office improved its process over the course of the reporting period and anticipates continued improvements in the next reporting period as it adjusts to the growth.

Timely review of three New Entrant reports did not occur due to prolonged back-and-forth with the filers regarding the need for additional information or clarification on their reports. In both cases where Termination reports were not initially reviewed within 60 days, the initial review was completed on the 61st day.

As noted below, USDA's Office of Ethics is, proportionally, one of least resourced and smallest Ethics Office of any Cabinet-level Department. At current staffing levels, each OGE 278 financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly 100 OGE-278e reports each year (not counting an even larger number of separate OGE-450 reviews), in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This large report volume combined with a large client population (~5,000 employees per advisor) and a significantly under-resourced Ethics Program makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics has suffered from under-investment and is one of the least resourced Ethics Offices of any Executive Branch Department.

Reviewers were waiting on additional information that was requested from the individual filers.

- Deployment - COVID-19 - Medical issues - Office turnover - Administrative oversight

Slow supervisory review - the Department of Defense Joint Ethics Regulation mandates supervisory review, and Integrity precludes ethics official review until supervisory review is done. Also, oversight, ethics official shortfalls, and the pandemic contributed to slow review times.

<p>The Department of Defense requires that supervisors review reports in addition to the command ethics counselor and DAEO. In some cases, the multiple levels of review delays the ethics counselor's initial review. Furthermore, it is likely that some ethics counselors completed their initial review within the 60 days but forgot to enter the date on the General Information page. This is the Department of the Navy's second year using the Integrity system and while the Office of the Assistant General Counsel has issued program guidance on when and how to end initial review, the fact that a command's ethics counselor may change from year to year, impacts the corporate knowledge on proper use of Financial Disclosure filing systems.</p>
<p>Personnel turnover and IT issues were the most common reasons given.</p>
<p>Report(s) reviewed more than 60 days after submission due to additional information being sought and unforeseen personal health and safety concerns encountered by filing employee(s) occurring concurrently with the financial disclosure review process.</p>
<p>One component had staffing changes within its ethics office which led to some delays. One component's certifying official was on deployment for the Department. Additional reasons include the Department's pandemic response and seeking additional information from filers.</p>
<p>Among other mission priorities, the Presidential transition imposed significant increased workload on limited staff, which unfortunately resulted in some delayed initial reviews.</p>
<p>Workloads of reviewers, staff changes, COVID delays.</p>
<p>Two DOT Operating Administrations added new reviewers to their ethics staff, who needed additional time and training to complete their initial reviews of reports. In addition, in some cases additional information was being sought.</p>
<p>Presidential Transition workstream stemming from CARES/ARP pandemic implementation staffing/workload issues.</p>
<p>Staffing and caseloads.</p>
<p>Only one report was reviewed more than 60 days after submission.</p>
<p>One career employee has complicated trust issues that prevented completion of initial review within 60 days.</p>
<p>Additional information was being sought.</p>
<p>Usually delays are due to additional information being sought by the employee. Additionally, our agency has a disproportionately high number of public financial disclosure filers for the size of our agency and the size of our ethics staff. Because of this, as noted above, we are looking into hiring an FTE in 2022 to focus primarily on financial disclosure.</p>

Termination report of former commissioner certified beyond 60, and DAEO didn't know one was required. When learned of it, former commissioner submitted report and it was immediately reviewed and certified.

Adjustments to work environment due to COVID-19 and additional responsibilities being assigned to ethics advisors were general reasons. One location did not contemporaneously document initial review when it was performed and only documented review after 60 days so most of its reports were counted as reviewed more than 60 days after submission.

Ethics staffing shortage in CY2021 and pandemic-related challenges.

One annual report was not reviewed within 60 days because, during the time that the filer's designee was compiling the data for the report, we were alerted to purchases of assets which put the filer at risk of violating 18 U.S.C. 208. After identifying potential violations, we therefore halted review and referred the matter to the NLRB's Inspector General.

In limited circumstances, filers communicated with ethics counselors regarding their form outside of Integrity and thus the review time was not properly tolled. Instructions have been provided to ethics counselors to ensure proper process for review in Integrity is followed.

Staffing shortage.

We have a human capital deficit. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports.

Reviewer oversight.

we had some filers complete their reports early and they were overlooked by accident. We also had one filer out on extended medical leave. Finally, we had 3 certified late because we were seeking information on those reports.

For the reports that were reviewed more than 60 days after submission, additional information or clarification was needed and it took a while for the filer to obtain the information.

At least one report was pending supervisor review for a significant time and the supervisor is external to the agency several reports required additional information requested of the filer some required the filer to amend and several required additional remedial actions for the filer to take. For all, an initial review occurred within the first 60 days, though the Integrity data extract shows at least 5 did not. However, this may be due to the agency not consistently using the Integrity function for documenting initial review dates by manual entry on the reports.

Staff shortage and additional information being sought.

N/K if some reports were reviewed >30 days after submission when at least one report has no filing date.

The Ethics Office did a review of all filings, including annual filings. A large number of reports required follow-up and correction, mostly for removing over reporting or for properly reporting assets which had been incorrectly categorized. The agency has seen a large influx of new employees, which has increased the amount of time the Ethics Office must devote to employee training and answering inquiries as well as increasing filings. The agency saw a 25% increase in total OGE278 filings and a 34% increase in total OGE450 filings this year.

Question 34 Table 2

Efforts to fix this, with OGE, including Liz Benjamin, were difficult. Instead of just changing the year on the report, the entire report had to be repopulated with information.

Technical difficulties accessing site contributed to delayed electronic processing

competing priorities/heavy workload

See above regarding reports that were initially reviewed more than 60 days after submission.

Some reports were not certified within 60 days because the reviewing official had to wait for the filer's supervisor to review and sign the report before it could be certified (paragraph 7-206 of the DoD Joint Ethics Regulation, DoD 5500.07-R, requires that all OGE Form 450 reports must be reviewed and signed by the filer's supervisor).

One OGE 278 annual report, the one filed by our Agency Director, Ms. Audrey Davis, was not certified timely because her supervisor, the Hon. Michael McCord, was unable access her report due to technical issues with his access to the Integrity system. As soon as those issues were resolved he was about sign her report and the agency was able to complete certification.

Waiting for supervisor to sign

Slow supervisory review - the Department of Defense Joint Ethics Regulation mandates supervisory review, and Integrity precludes ethics official review until supervisory review is done. Also, oversight, ethics official shortfalls, and the pandemic contributed to slow review times. Also, the Army does not include the following Army officials assigned to other DAEO organizations in its responses to part 8: O 15 career employees required to file annual reports who indeed filed, 10 of which were certified within 60 days, five of which were neither certified nor initially reviewed within 60 days. O 60 other employees required to file annual reports who indeed filed, 43 of which were certified within 60 days, two of which were not certified within 60 days but were initially reviewed within 60 days, and 14 of which were neither certified nor initially reviewed within 60 days. O 1 career new entrant filer whose report was certified within

60 days. O 21 other new entrant filers, 14 of which were certified within 60 days, two of which were not certified within 60 days but were initially reviewed within 60 days, and two of which were neither initially reviewed nor certified within 60 days. O 2 career termination filers, both certified within 60 days. O 7 other termination filers, four of which were certified within 60 days, one of which not certified within 60 days but was initially reviewed within 60 days, and two of which were neither initially reviewed nor certified within 60 days. O A total of 13 extensions.

The Department of Defense requires that supervisor review reports in addition to the command ethics counselor and DAEO. In some cases, the multiple levels of review delays the DAEO final certification.

Report(s) reviewed more than 60 days after submission due to additional information being sought and unforeseen personal health and safety concerns encountered by filing employee(s) occurring concurrently with the financial disclosure review.

Reasons include the Department's responses to the pandemic and the migrant child crisis, certifying officials serving in acting capacities during the transition, one component's certifying official being on deployment, and staffing changes.

Staff changes, availability and workload of certifying officials, COVID delays.

workload/staffing

Filers do not all assiduously respond to questions or requests for clarification. Some filers reported that notifications from INTEGRITY do not land in their inboxes but instead are directed to their spam, clutter or junk folders.

filer was out on extended leave.

Termination report of former commissioner certified beyond 60, and DAEO didn't know one was required. When learned of it, former commissioner submitted report and it was immediately reviewed and certified.

Adjustments to work environment due to COVID-19 and additional responsibilities being assigned to ethics advisors were general reasons. At one location the confluence of an ethics team member addressing acute family care issues coinciding with home computer hardware issues, complexity of follow up including reconciling periodically reported entries and a high litigation caseload abridging surge support implicated certification timeliness.

Ethics staffing shortage in CY2021 and pandemic-related challenges.

The were two reports (1 PAS and 1 Career SES) that were not certified because the NLRB's Inspector General substantiated allegations that the filers had each participated in at least one matter where the filer had a financial interest.
illness and family deaths delayed a few filers from timely providing follow-up information. A couple of filers were not notified that their reports required additional information because of a workflow error. Workflow error was resolved.
Staffing limitations were the main cause of reports being reviewed more than 60 days after submission. The ONDCP Office of General Counsel is responsible for many legal responsibilities in addition to serving as the agency ethics counsel.
filer delay despite repeated reminders
As noted above, we need to increase staff on our Ethics Team in order to meet timeliness requirements.
staff shortage
As we only have two employees, there is often confusion regarding the final steps in the certification process.
The Ethics Office did a review of all filings, including annual filings. A large number of reports required follow-up and correction, mostly for removing over reporting or for properly reporting assets which had been incorrectly categorized. The agency has seen a large influx of new employees, which has increased filings. The agency saw a 25% increase in total OGE278 filings and a 34% increase in total OGE450 filings this year. The DAEO is the final certifying authority for the agency and that individual has been serving as acting agency head for almost all of 2021.

Additional Comments Part 8

The required Annual/Termination combined report was requested in CY2021 and received in CY2022.
Q36a- Late filing fee waived for all late filers contrary to Integrity database
Q33 - Numbers are classified unless included. Q35 - The CIA financial disclosure database does not differentiate between career SES and SES officers who are term, non-career. We count all as career SES except for our 1 PA position, which we count as non-career SES
Question #33: One filer whose new entrant report was required to be filed by 11/24/2021, was given a 47-day extension until 1/10/2022. Therefore, her report was not counted. Another filer

was required to file her report on 1/5/2022, however, the report was filed on 12/21/2021. That report was counted.

For Questions 33 and 34 - The "other" category represents a New Entrant and Termination OGE 278e Report for a GS-15 career employee who was temporarily designated as the DAEO for a short period until the DAEO came on board.

Question 36b: In 2021, DCSA learned that three agency employees failed to timely submit periodic transaction reports for transactions that occurred in 2020 and 2021. These employees have been notified that their reports were untimely and that they may be required to pay a late filing fee. We are currently in the process of calculating the late fees owed and providing formal notice of the fees owed.

It should be noted that USDA has the second-most political appointees in the executive branch with more than 200 appointees, making presidential transition years (like 2021) extremely challenging.

*Regarding Q# 36 - Army collected late filing fee from an officer whose termination report was due in 2014 but was submitted in 2021. Also regarding Q# 36, some late filing fee waivers were not recorded in Integrity.

Q33 & 34 General and Flag officers on joint duty assignments file OGE 278 forms with the individual officer's respective Military Department DAEO Agency in Integrity, but the reports are reviewed and certified by ethics officials at the agency/command where they are assigned. This ensures that the officers reports remain accessible even with frequent transfers to new assignments, while providing the local visibility necessary to help prevent conflicts of interest. Q38 Several of these were large requests for multiple filers and years, with one request seeking six years of reports for 250 filers (over 1000 documents)

Questions #33 and #34: The difference in the number of public financial disclosure reports filed in 2021 and the number certified in 2021 is the result of certain reports submitted at the end of 2020 and which were certified or closed in 2021.

Q33 & 34: Integrity numbers from the data pull may not be entirely accurate so we also relied on internal data. Q36: Integrity may reflect differences in late fee numbers for 278s and 278-Ts because these may have been incorrectly categorized e.g., waivers for a 278-T were noted on a 278 that was timely filed. Some of the late fee waivers were issued for transactions that were reported late on OGE Form 278e reports, rather than on actual 278-T reports. They are reported in this section, however, because the 278e reports that listed the late transactions were timely filed, and filers were not always required to file separate 278-T reports after reporting the transactions on their 278e reports.

Question #33: The chairman of the board of directors of the FCSIC also serves as a board member to the FCA. The public financial disclosure form of the chairman of the board of directors of the FCSIC is accounted for under the FCA's 2021 annual Agency Ethics Program Questionnaire. Question #38: The FCA received one OGE Form 201 for the member of the board of directors of FCA who also serves as the chairman of the board of directors of the FCSIC. The OGE Form 201 is accounted for under the FCA's 2021 annual Agency Ethics Program Questionnaire rather than the FCSIC's questionnaire to avoid double counting.

Question 33/34 - Please note that the filing and review report numbers listed in Integrity are not accurate for our agency. One filer inadvertently selected Career SES employee category. The FDIC does not have any Career SES employees.

Re #36a, 9 of the 10 late filing fee waivers were issued bc the Ethics Office wasn't made aware of employee promotions necessitating filing the 278 in a timely manner. HR has since implemented a new procedure to ensure the Ethics Office is regularly notified.

Q35- one public filer files periodic transaction reports via paper, which have been included in the total number of periodic transaction reports.

For questions 34-36, the 278 annual and periodic transaction reports are administered for the Council by the Department of Commerce Ethics division and the Council does not have access to this information directly. OGE has confirmed that the Council "successfully completed the 2021 filing cycle." The numbers entered in the questionnaire may therefore not be accurate.

Q. 36(a) One additional individual was assessed a late fee due in 2021 that was paid in 2022. Four additional individuals were assessed a late fee in 2021 due in 2022 for which follow up to secure payment or consider waiver is being conducted.

Question 38-All but one of the OGE Form 201 request were for records of the prior administration held as part of NARA's custody of presidential records - i.e., not under the DAEO's jurisdiction. One OGE Form 201 request was for NARA public financial disclosure reports and related documents.

Note the discrepancy between answer to 33c and 34c - a single termination report filed in 2020 was certified in 2021.

Question 33: This information is classified. All filers completed reports on time and OGC reviewed and completed all annual filing by December 31, 2021. Question 34: This information is classified. All annual public financial disclosure reports were closed by the end of CY2021. All reports were initially reviewed within 60 days.

#36b. - although there are 50 transaction waivers, only 13 individuals required transaction waivers. Reasons ranged from extended absences due to prolonged illness and family deaths, a

spouse not disclosing transactions to filers, and overlooking a transaction in a managed account.

Question 34: The numbers reported in this question are percentages, rather than numeric counts of reports reviewed. Actual numbers are made available to cleared OGE personnel when required. NSA's ethics office is within the same section of the Office of the General Counsel (OGC) as the team that handles all administrative legal matters for the agency. It has been OGC's practice for the entire team of attorneys in this section to review financial disclosure reports. With the ongoing challenges presented by the COVID-19 pandemic in 2021, particularly for NSA, which is uniquely postured to require a largely in-person workforce, the focus of the administrative law attorneys has been necessarily redirected to the agency's efforts in that regard. As a consequence, some of the public financial disclosure reports were not reviewed within 60 days of filing. We note that the number of reports reviewed in 60 days in 2021 generally improved from the corresponding number reported in NSA's 2020 Questionnaire.

38. Requests for public financial disclosure reports are centrally-managed by the White House Office, including requests for reports filed by NSC personnel.

Q33: The annual OGE 278 public financial disclosure in this response refers to the Vice President's annual OGE 278 that was filed in 2021. Q38: Requests for public financial disclosure reports are centrally managed by the White House Office, including requests for reports filed by OVP personnel.

Question 36: One 2021 termination report is still outstanding and the determination to impose or waive a late filing fee has not yet been made.

Filers file 278-Ts to report "no transactions made." These cannot be processed.

Q33: Three employees who are required to file, but have not yet filed OGE 278 reports in 2021, are in the process of doing so in 2022. Q34: Due to additional information being sought from the filers, 12 OGE 278 reports were certified after 60 days. Q38: WHO provides responses to requests for public financial disclosure reports for employees of the White House Office, the Office of the Vice President, the Council of Economic Advisers, the National Security Council, and the Office of the National Cyber Director

Question 39 Table 1

USADF did not collect three (3) confidential financial disclosures due to misinterpretation of its internal financial management policy. On or around January 15, 2022, USADF revised its list of required confidential filers based on an internal evaluation, and those three filers held positions that have now been assessed as not requiring confidential disclosures.

CIA requires certain officers to file the Form 450, e.g., if they participate in contracting/procurement activities, or have Agency certifications to do so. The reason in general for the discrepancy concerns officers who have the Agency certification to engage in specific contracting/procurement activities, but who never engaged in those activities (of have not for years) and who no longer want to retain the certification. A consequence for failure to file the OGE 450 is the Agency revokes the certification to engage in specific contracting/procurement activities. Another reason for the discrepancy is likely that some officers are out of the office on extended leave due to the pandemic.

One New Entrant was hired late in the year and was not timely entered into FDonline. The New Entrant will complete the OGE450 in February 2022.

The employee who did not file a 450 in 2021 is on extended leave.

Late notice by ethics office to a new entrant detailee resulted in late filing, after CY 2021. Report was filed and certified at the beginning of the CY 2022 reporting period.

Three were detailees on short term detail to CEQ and departed before filing. The fourth is an IPA detailee. CEQ is working with this employee in ensure she files.

DCSA had one New Entrant OGE Form 450 filer whose report was not required to be filed by December 31, 2021 [the report was due on January 15, 2022], but who submitted his report on December 20, 2021.

There were problems (due to re-organizations and departures from organizations) ensuring that all employees completed their OGE 450s, and software problems that resulted in some completed forms being misrouted to the wrong supervisor or reviewer, or the reviewer never being aware the form was assigned to the reviewer. Additionally, some supervisors needed prodding to participate.

Resource limitations and staff turnover impacted the consistency with which the ethics program was able to monitor the status of assigned reports in FDM. Of the 42 reports that were due by 31 December 2021 that were not submitted on-time, all but one were New Entrant Reports. DIA OGC contacted each of the late filers in January to remind them to file and obtain justification for late filings. According to feedback received from the filers, the majority had been confused about their filing obligations and/or had not realized that they were required to file a New Entrant Report many expressed that they were aware of the annual filing requirement but had not realized that they were also required to file a new entrant report. Note: As of 27 January 2022, 27 of the 42 overdue reports have been filed only 15 are still pending filing. As part of the ethics program's mitigation strategy, the program staff intends to further engage supervisors and office POCs, especially to recommend best practices for notifying filers, particularly New Entrants, of their filing requirements and deadlines, and frequently remind FDM POCs to monitor the status of their organizations filers assignments in

FDM. The new ethics team is taking concrete steps to ensure that the issue of overdue reports does not occur in 2022, including increasing outreach to supervisors and FDM POCs and frequently and closely monitoring the status of assignments in FDM.

A military member, who arrived in November 2021, was not identified as a financial disclosure filer until January 19, 2022, after he attended initial ethics training. His new entrant report was certified on January 24, 2022.

Some employees failed to file due to transfers to other agencies, leaving government, or long term leave. A small number of employees simply failed to submit their reports despite being on duty and receiving more than 20 past due filing notices from the USDA Office of Ethics.

These individuals were out of the office for an extended period of time, such as for administrative leave or military leave.

- Filer medical issues - Deployment - Filer non-compliance, despite repeated notices - Permanent Change of Station - Technical issues with FDM - Turnover/lack of continuity in ethics office - Filers not identified and unknown to counsel's office -One wing has a local filing requirement for certain employees such as contracting officer representatives who are not normally required by the CFR or Air Force regulations to submit an OGE 450, hence more filed OGE 450s than required by regulation

HR office failure to accurately notify the servicing ethics office of incoming financial disclosure report filers, inaccuracies in maintenance of filer lists in FDM, combat zone extensions.

Some of the outstanding OGE 450 reports are the result of ethics counselors not updating their lists of filers at the start of the filing season and reports being automatically assigned to filers that are no longer with the command or are no longer required to file. DDAEOs are actively working with commands to remove erroneously assigned reports or, if properly assigned, have the filer complete the report.

Most agencies/commands cited staffing and personnel turnover and IT issues.

One employee on extended sick/medical leave and eight employees are non compliant.

Some filers are on extended leave, some new entrant filers were not notified of filing requirements due to administrative oversight, some filers are within the grace period, some filers who submitted preclearance reports have not formally filed reports since onboarding, and one filer is delinquent.

The majority are filers who were on extended military, medical, or other leave and did not file. They remain on our books as employees and therefore retain their filing requirements. The remaining were those who either left government without filing or whom were referred for compliance at end of year.

<p>OIG: One filer is on extended administrative leave and does not yet have a return to work or termination date certain.</p>
<p>Filers on extended leave (e.g., military, sick, bereavement and parental), administrative errors, filers left or transferred offices.</p>
<p>69=admin oversight, 51=employees on extended leave, military leave</p>
<p>Ethics Office ascertaining whether some of the delinquent reports are required, or whether they can be closed/removed. Also, many delinquent reports are new entrant reports due near the end of the year.</p>
<p>The discrepancies between the number of employees who were required to file confidential financial disclosure reports and the number of employees who actually filed are attributable to employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status.</p>
<p>The late filers submitted their OGE Form 450 reports in January 2022, within 30 days after their due dates.</p>
<p>Despite reminders sent for these reports that were due in November and December, filers had not complied. As of 2/1/22, one report is outstanding, and the filer is expected to submit imminently.</p>
<p>Terminating employees who left without filing an assigned report.</p>
<p>Some filers reported that filing notifications do not land in their inboxes but instead are directed to spam, clutter or junk folders. With a decentralized ethics program, EPA experiences a certain amount of turnover in DEO and Assistant DEO positions. Newer officials don't always realize what their ethics programmatic responsibilities entail and don't follow up with their filers.</p>
<p>The one employee who did not file was out on approved extended sick leave during calendar year 2021.</p>
<p>Three filers were on extended sick leave or leave without pay.</p>
<p>16 annual reports are outstanding because of extended leave.</p>
<p>Not applicable as there is no discrepancy between the number of reports required to be filed and the actual number of reports filed.</p>
<p>Three on extended medical leave. Following up on the 38 who did not file a report by December 31, 2021 is being conducted.</p>

Two OGE 450 filers were on extended leave and were granted filing extensions, but both separated from the agency prior to submitting an annual OGE 450. One employee who is typically an annual filer was excluded from the requirement due to on-going weather and safety leave - i.e., he did not perform duties while on this leave. One alternate filer was on extended leave and another alternate filer did not timely submit a form.

Question 39: The numbers reported in this question are percentages, rather than numeric counts of reports reviewed. Actual numbers are made available to cleared OGE personnel when required. With regard to the small discrepancy between reports required to be filed and those that were filed, the ethics office is reviewing the individual circumstances and reaching out to the filers and their supervisors to ensure that reports are submitted where required.

One individual who was required to file an OGE 450 report departed the NSC before the end of the reporting period.

Two employees joined OMB late in 2021. Their initial reports were due by 12/31/2021, but were not filed on time. Both employees have now filed their initial 450, and those reports have been reviewed and certified. One detailee joined OMB and submitted an initial 450, but left OMB within 90 days and before discussions with OMB Ethics were complete. The submitted 450 for this employee received an initial review within 30 days.

3 of our staff members who were assigned 450s failed to complete/submit them.

One filer was out on extended medical leave when assigned their annual report, then never returned to work to fulfill the requirement. They have since left the agency.

The one filer who was required to file but did not file was out of the office for the entire 2021 calendar year. He ultimately retired after the filing deadline without returning to the office.

Employee left the agency or died.

One report was required to be filed by October 25, 2021, however, the filer had technical issues accessing the FDM system in order to complete the filing. As of this report submission, the issue was resolved and the report has been filed.

Tracking discrepancies in at mission in Burma due to coup in 2021 that required the evacuation of the mission.

One SGE, a person who is blind, has encountered network and accessibility issues. The agency has worked with a contractor recently to ensure network accessibility however, the SGE must employ a human "reader" to assist him with accessing the websites where his financial account information and other asset information is located. Because of the ongoing covid pandemic, the SGE is not comfortable with allowing other people into his home to assist him. We continue to work diligently with the SGE to ensure his report is filed.

Two employees would not file when told to.
One individual did not file their New Entrant report and it was not caught until January 2022. The Ethics Office followed up and the individual submitted their filing within a few days. As of the date of this agency submission, all financial disclosures required to be filed by December 31, 2021 have been filed.
Two individuals who were required to file OGE 450 reports in 2021 are no longer employed by WHO and two individuals required to file in 2021 are in the process of filing in 2022.

Question 40 Table 1

Volume of reports staffing challenges in the midst of the pandemic quarantine.
Competing priorities/heavy workload
We were waiting for updated or clarifying information from the filer.
One initial review occurred at day 61, the day after a federal holiday.
Due to changes in supervisors, not all supervisors were aware of reports for their review, and therefore the supervisor review was extended. DCAA has implemented measures to ensure that filer organization points of contact timely inform the certifying official of changes so the correct supervisor receives the report. The Department of Defense, Joint Ethics Regulation Supplement, requires supervisor reviews. In addition, filers with complex reports required additional reviews and supervisors and certifying officials sought additional information. At DCAA, supervisors also use the OGE 450 for data to assist with determining whether an auditor has a threat to independence under Generally Accepted Government Auditing Standards (GAGAS), a compliance standard that applies to government auditors.
Workload, and the inevitable hump caused by them all coming due (and overdue) at once. We've made massive improvement in our OGE 450 processing times from last year.
Due to wholesale turnover in the ethics program over the 2021 calendar year, there were periods of time where there were inadequate numbers of staff who could consistently monitor the status of reports in Integrity and review reports in a timely manner. Additionally, it has been difficult to determine the cause of delays in reviewing and certifying reports due to the departures of Ethics program personnel, however it was possible to ascertain in some cases that mission-related exigencies delayed some supervisors timely review and certification of reports, which subsequently delayed the ethics program final certification timeline. In the past six months, three additional employees joined the ethics program. The ethics program is now effectively staffed and is aggressively addressing the backlog, as well as implementing measures to avoid instances of untimely review and certification. Note: As of 27 January 2022, 17 CY 2021

reports are still outstanding pending filer action, 42 are pending supervisor action, and 69 are either under review by the ethics program or are in the process of being amended.

These numbers are similar again to last year, so we will have to re-double our efforts to ensure timely certification. We will hold a working group to ensure all counsel routinely inspect their FDM log to ensure reports are timely certified.

At current staffing levels, each financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly nine hundred (900) OGE-450 reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This very large report volume combined with a very large client population (~5,000 employees per advisor) makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics is one of the least resourced Ethics Offices of any Executive Branch Department.

- High OPTEMPO - Personnel shortages/changes - COVID-19 related issues - In need of OGE Form 450 training - Administrative oversight - Supervisor workload/unable to certify within a timely manner - Additional information sought/supervisor needed to re-certify - Deployment - Filer non-compliance - Technical issues w/ FDM

Late supervisory review, oversight, COVID pandemic, ethics personnel shortfalls, combat zone extensions.

The Department of Defense requires that supervisors review reports in addition to the OGE 450 certifier. In some cases, the dual level of review delays the OGE 450 certifier's initial review. Furthermore, it is likely that some of the OGE 450 certifiers completed their initial review within the 60-day time period, but forgot to end initial review in FDM. While the Office of the Assistant General Counsel has issued program guidance on when and how to end initial review, the fact that a command's OGE 450 certifier may change from year to year, impacts the corporate knowledge on proper use of Financial Disclosure filing systems.

Several agencies/commands experienced a variety of issues. Most commonly cited were ethics personnel turnover, workload, and failure to use system functionality to record initial review dates and track deadlines. Extended leave and IT issues were also cited.

Division encountered resource and staffing challenges resulting from the Presidential change in administration.

The Department transitioned to an electronic confidential financial disclosure reporting system, FDonline, for the 2021 annual confidential financial disclosure report season. DOE ethics officials were learning how to generate reports, track reports, assign reviewers to reports, and annotate reports based on information provided by filers. Accordingly, the review and

certification process took additional time resulting in delayed reviews and certification of reports.
Reasons include reviewers learning how to use EFDS, seeking additional information from filers, technical problems, significant increases in number of filers that led to unexpected staffing shortages, time required to train new staff, residual delays related to prior backlogs, and pandemic and other priority workloads.
Due to realignment of limited resources to meet Presidential transition priorities, some reports were initially reviewed more than 60 days after submission.
HUD: Staff turnover in field/regional offices resulted in slow productivity with report reviews. _____ OIG: In 2021, employees remained in a 100% telework environment due to the ongoing pandemic. Employees continued to experience school/daycare closures and quarantines and attempting to work from home with children at home. Employees were slower to respond to verify information or provide additional information needed about assets, supervisors were slower in their review, and final certification slowed as a result.
Reviewer workloads, inadvertent administrative error/oversight, COVID disruptions, staffing turnover and shortages.
The Ethics Office was focused on reviewing and certifying both terminating and incoming Presidential Appointed Candidates, Non-career, and Schedule C financial disclosure reports. In addition, some reports need additional information to complete the conflicts review.
Certain reports were reviewed more than 60 days after submission because of inadvertent oversight in tracking dates the reports were submitted.
Several components of DOT implemented the FOnline e-filing system for OGE Form 450 reports beginning on January 1, 2021 as a result of transitioning to FOnline and training reviewers on how to use the system, some reviewers needed additional time to complete their initial reviews of reports. For some reports, additional information was needed to complete initial reviews.
Pandemic and administrative-related issues staffing changes at one bureau additional information sought and questions concerning some reports.
Seeking additional information.
Under EPA's decentralized ethics program, more than 100 DEOs oversee the confidential financial disclosure system, not EPA Ethics. Each DEO may elect to have an assistant DEO review submitted e450s prior to the DEO. We realized in 2021 that our system wasn't accurately tracking initial review periods, so we are reporting a higher number of reviews beyond 60 days than may have actually occurred. We believe we have fixed the glitch for 2022.

All three were new entrant reports that were submitted outside of annual filing season. Agency did not activate auto-generated notices when reports received by system. Agency has corrected the settings to prevent further occurrences.

Reports with initial reviews completed more than 60 days after submission were due to workload-related delays and tracking inaccuracies. Due to the ongoing impact of the pandemic on FDIC-operations at the Assistant Regional Director level - FDIC's primary ethics counselors - some initial reviews took longer than 60 days. Additionally, reviewers do not consistently record timely initial review completion date, resulting in timely initial reviews that appear late based on the final certification date.

Additional information was being sought.

Reviewers were seeking additional information from filers.

Hundreds of reports are reviewed and certified by supervisory managers in offices and divisions throughout the FTC. Despite repeated reminders from the Ethics Team, inevitably a small number of managers fail to timely review and certify reports.

Adjustments to work environment due to COVID-19 and additional responsibilities being assigned to ethics advisors were general reasons. Military duty, detail assignment, and backfill delays were also cited. One location did not contemporaneously document initial review when it was conducted, so those forms were counted as reviewed more than 30 days after submission. One form was not initially assigned to the correct location.

Several forms were new entrant forms. The agency identified an issue with the workflow of new entrant forms that were being processed electronically in early 2021. This was identified in the OGE program review. This workflow has been adjusted and corrected. Additionally, the agency switched to electronic processing of the forms in 2021 due to ongoing, 100% telework, and this disruption to prior, paper review of the forms led to some forms not being timely reviewed. The DAEO has taken steps to address this for the current filing season.

Failure to certify two reports in a timely manner was oversight on the DAEO's part attributable to a critical legal issue confronting the agency and requiring a significant amount of time and attention (the General counsel serves as the agency DAEO).

Delays were due to unanticipated work demands and staffing shortages. Other delays were due to requesting additional information from filers and technical issues with the OGE 450 e-filing system.

6 reports were not timely reviewed due to administrative delays related to agency and staff bandwidth. 3 were as further information was sought.

Some filings were closed after the 60 days. In most cases, we are seeking additional information and/or taking remedial action. However, we also have many filers and a limited number of reviewers.

NSA's ethics office is within the same section of the Office of the General Counsel (OGC) as the team that handles all administrative legal matters for the agency. It has been OGC's practice for the entire team of attorneys in this section to review financial disclosure reports. With the ongoing challenges presented by the COVID-19 pandemic in 2021, particularly for NSA, which is uniquely postured to require a largely in-person workforce, the focus of the administrative law attorneys has been necessarily redirected to the agency's efforts in that regard. As a consequence, a small number of confidential financial disclosure reports were not reviewed within 60 days of filing. We note that the number of reports reviewed in 60 days in 2021 significantly improved from the corresponding number reported in NSA's 2020 Questionnaire.

In limited circumstances, filers communicated with ethics counselors regarding their form outside of Ethics Gateway and thus the review time was not properly tolled. Instructions have been provided to ethics counselors to ensure proper process for review in Integrity is followed

Almost a third of the reports certified after 60 days were only one or two days late. And several of those certified later than that were returned by the reviewers to the filer for additional information. While the SEC's electronic filing system CFDS has increased compliance in this area significantly, we have had new office reviewers. And if the office intermediate reviewer does not timely complete their review, it can leave little time for the final reviewer to timely certify. Late in the year, CFDS was enhanced to (1) send automated email reminders for 450s returned by the reviewers to filers for additional information and (2) send automated remainder emails containing the specific name of the filer whose 450 is coming due with the relevant due date. We anticipate that these updates made late in the year will have a positive impact on the timeliness of reviews in this calendar year.

Additional information required, extended leave, system errors due to increased workforce related to the pandemic.

Waiting on information from employee, reviewer error

For the reports that were certified more than 60 days after submission, additional information or clarification was needed and it took a while for the filer to obtain the information.

All reports received initial reviews within 60 days. Reports certified after 60 days required an additional action, either by the filer, supervisor, or there was a requirement for a remedial action to be resolved before an ethics official would certify.

Discrepancies between a. and b./c. due to missions not tracking this data. While total # of reports certified/closed was captured, # initially reviewed within 60 days and certified/closed within 60 days was not. Therefore, the data reported for b. and c. is skewed.
There were two OIG reports that were not reviewed within sixty days because additional information was being sought. There were six reports that were not certified within sixty days.
The Ethics Office did a review of all filings, including annual filings. A large number of reports required follow-up and correction, mostly for removing over reporting or for properly reporting assets which had been incorrectly categorized. The agency has seen a large influx of new employees, which has increased the amount of time the Ethics Office must devote to employee training and answering inquiries as well as increasing filings. The agency saw a 25% increase in total OGE278 filings and a 34% increase in total OGE450 filings this year.

Question 40 Table 2

Competing priorities/heavy workload
One report was not certified within 60 days because of an ethics concern arising out of an outside activity disclosed on a new entrant’s OGE Form 450. The employee subsequently left the Bureau. The remaining three OGE Form 450 reports were not certified within 60 days because the filers owned prohibited holdings as defined under the Bureau’s Supplemental Ethics regulations at 5 C.F.R. 9401.106(a). Those issues were resolved within the 90-day divestiture period provided for in the Bureau’s Supplemental Regulations for securities recently added to the Bureau’s Prohibited Holdings List, after which the reports were certified.
Three reports were certified late by 10 days or less due to logistics. However, in each such case, the initial review was conducted within 60 days.
On two occasions, the CEQ reviewer did not to sign on the form in a timely manner after completing the review. In both cases, the review had been completed timely.
New position was created for Director of IT and this individual’s report did not get certified in a timely manner.
Some reports were not certified within 60 days because the reviewing official had to wait for the filer's supervisor to review and sign the report before it could be certified (paragraph 7-306 of the DoD Joint Ethics Regulation, DoD 5500.07-R, requires that all OGE Form 450 reports must be reviewed and signed by the filer's supervisor).
One report was pending under supervisory review for an extended period and took slightly longer than 60 days to complete final certification but was reviewed within the 60 day period.

<p>One new entrant report was filed on December 13, 2021 and is still pending supervisory review and final certification.</p>
<p>Workload, and the inevitable hump caused by them all coming due (and overdue) at once. We've made massive improvement in our OGE 450 processing times.</p>
<p>Due to wholesale turnover in the ethics program over the 2021 calendar year, there were periods of time where there were inadequate numbers of staff who could consistently monitor the status of reports in Integrity and review reports in a timely manner. Additionally, it has been difficult to determine the cause of delays in reviewing and certifying reports due to the departures of Ethics program personnel, however it was possible to ascertain in some cases that mission-related exigencies delayed some supervisors timely review and certification of reports, which subsequently delayed the ethics program's final certification timeline. In the past six months, three additional employees joined the ethics program. The ethics program is now effectively staffed and is aggressively addressing the backlog, as well as implementing measures to avoid instances of untimely review and certification. Note: As of 27 January 2022, 17 CY 2021 reports are still outstanding pending filer action, 42 are pending supervisor action, and 69 are either under review by the ethics program or are in the process of being amended.</p>
<p>DLA certified all annual filers during the annual filing season in a 100% timely fashion. The few that were not certified within the 60 days were caused primarily by off-cycle changes to assignments, where either the supervisor or reviewing counsel were unaware of the filing. DLA continues to work hard to ensure all ethics counselors routinely monitor their notices and the data base to ensure complete timely certifications.</p>
<p>Reviewers departed the office during the certification period, requiring their reports to be reassigned.</p>
<p>Late supervisory review, oversight, COVID pandemic, ethics personnel shortfalls, combat zone extensions.</p>
<p>The Department of Defense requires that supervisors review reports in addition to the OGE 450 certifying official. In some cases, the dual level of review impacts the OGE 450 certifying officials final certification.</p>
<p>We were unaware that an amended report was located in the FDM Manage Exceptions folder. Once we realized it was there we certified it.</p>
<p>Other reasons include reviewers going on extended leave, technical issues, increases in volume causing unexpected staffing shortages, and pandemic workload.</p>
<p>Reports that were closed/certified more than 60 days was due to supervisor changes that caused delay in review from the date reports were filed.</p>

OIG: In 2021, employees remained in a 100% telework environment due to the ongoing pandemic. Employees continued to experience school/daycare closures and quarantines and attempting to work from home with children at home. Employees were slower to respond to verify information or provide additional information needed about assets, supervisors were slower in their review, and final certification slowed as a result.
Workload of Intermediate and Final Agency Reviewers, COVID disruptions
Certain reports were not certified or closed more than 60 days after submission because of extended filer leave rendered the filer was unavailable to respond to inquiries from ethics officials.
Several components of DOT implemented the FDonline e-filing system for OGE Form 450 reports beginning on January 1, 2021 as a result of transitioning to FDonline and training certifying officials on how to use the system, some certifying officials needed additional time to complete their certifications of reports.
administrative delays change in supervisor who could readily identify conflict issues vacancy of supervisor position, especially during transition and some office reorganization change in employee duties tech glitches with or supervisor reluctance to use/follow e-filing process.
Our e450 system requires specific names in the DEO/ADEO roles. Whenever an incumbent leaves a position or is otherwise unavailable, then any pending forms are "stuck" in the system. We are working on educating ethics officials to notify EPA Ethics whenever there are changes to the DEO/ADEO to keep the system moving fluidly. Another issue we identified is that some ethics officials and filers fail to follow up assiduously, so uncertified forms languish in the system.
Reports sat in system until periodic check by administrator. Auto-generated notices have been activated to prevent further occurrences.
For two OGE Form 450s, the certifying official timely signed the Intermediate Reviewer line and inadvertently did not sign the certifier line on the form. This was an administrative oversight that was not identified within the 60-day timeframe.
See above.
Hundreds of reports are reviewed and certified by supervisory managers in offices and divisions throughout the FTC. Despite repeated reminders from the Ethics Team, inevitably a small number of managers fail to timely review and certify reports.
Complexity of holdings identified issues requiring appropriate cautionary advice were generally noted. Filer workload is believed to have added to a delays in responses necessitating multiple reminders.

<p>Several forms were new entrant forms. The agency identified an issue with the workflow of new entrant forms that were being processed electronically in early 2021. This was identified in the OGE program review. This workflow has been adjusted and corrected. Additionally, the agency switched to electronic processing of the forms in 2021 due to ongoing, 100% telework, and this disruption to prior, paper review of the forms led to some forms not being timely reviewed. The DAEO has taken steps to address this for the current filing season.</p>
<p>Failure to certify two reports in a timely manner was oversight on the DAEO's part attributable to a critical legal issue confronting the agency and requiring a significant amount of time and attention (the General counsel serves as the agency DAEO).</p>
<p>Delays were due to unanticipated work demands and staffing shortages. Other delays were due to requesting additional information from filers and technical issues with the OGE 450 e-filing system.</p>
<p>47 out of 49 reports were not certified timely due to administrative delays related to agency and staff bandwidth. NEA is assessing its procedures and resources to ensure we are able to timely certify in future rounds.</p>
<p>See the explanation immediately above regarding reports that were reviewed more than 60 days after submission.</p>
<p>5 of the staff members who were assigned 450s requested and were granted extensions beyond 60 days.</p>
<p>As noted in Q. 39, five employees were required to file confidential financial disclosures in 2021. One report was not certified before the end of the calendar year, as additional information was being sought. This report was subsequently certified in 2022.</p>
<p>As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports. In addition, we have implemented the use of an electronic financial disclosure management system (FDM) to improve this aspect of our ethics program going forward. In 2022, most, if not all filers, will file within FDM.</p>
<p>The Ethics Office did a review of all filings, including annual filings. A large number of reports required follow-up and correction, mostly for removing over reporting or for properly reporting assets which had been incorrectly categorized. The agency has seen a large influx of new employees, which has increased filings. The agency saw a 25% increase in total OGE278 filings and a 34% increase in total OGE450 filings this year. The DAEO is the final certifying authority for the agency and that individual has been serving as acting agency head for almost all of 2021.</p>

Additional Comments Part 9

39. One employee passed away in June 2021 but had submitted the Confidential Financial Disclosure in February. Therefore the number who filed reports in 2021 was 12 but the number of employees as of 12/31/21 was 13 instead of 14.
Q 39-40 Numbers are classified unless included.
Q39. Best estimates reported for some offices' confidential financial disclosure reports due to COVID maximum telework disruptions.
Questions #39 and #40: The difference in the number of confidential financial disclosure reports filed in 2021 and the number certified in 2021 is the result of certain reports submitted at the end of 2021 and which were still under review and not certified or closed by December 31, 2021.
Q40: In DO/HQ, the e-filing was not initially designed to capture the initial review date if a report was returned to the filer. An enhancement was made to the e-filing system to capture the initial review date and the return date of an OGE 450.
Question #39: The FCSIC does not currently employ any Confidential Financial Disclosure Filers, OGE Form 450. However, three FCSIC employees file the Conflicts of Interest Certification Form, which are collected from incumbents every three years and certain new entrants when they enter on duty. In 2021, incumbent filers were not required to file the Conflicts of Interest Certification Form and no new entrants entered on duty. Incumbents will file again in 2023.
#41 - DAEO granted administrative extensions to one (1) filer (medical related issue).
Q. 39. Some employees had trouble completing submission of their forms in EPTS so they remained in a draft status.
Question 39: This information is classified. All annual filers reports filed by December 31, 2021. Question 40: This information is classified. All filings were reviewed within 60 days. Not all were closed in 60 days.
Question 41: The numbers reported in response to this question are percentages, rather than numeric counts of extensions granted. Actual numbers are made available to cleared personnel when available.
we granted an extension for a filer who had a death in her family the week her report was due and she was on leave.
USPS underwent a reorganization and the Financial Disclosure System had to be reprogrammed. During that time period, annual filers were not able to access the system to file.

In order to ensure that we captured all eligible OGE 450 annual filers and they had sufficient time to file, we granted extensions to our annual filers.

Q40: Due to additional information being sought from the filers, 28 OGE 278 reports were certified after 60 days.

Question 45 Table 1

<p>One of the Major Commands was unaware that the USAF Office of Special Investigations (OSI) referred an acquisition fraud allegation to DoJ until it collected data for the annual questionnaire. Per the instructions on the OGE Form 202, the referring office (OSI in this case) is responsible for completing the OGE Form 202 and sending it to OGE. The Major Command's Ethics Official, through its contracts law attorney at the affected installation contacted OSI to remind them of the requirement and requested a copy. Upon learning that OSI had not submitted an OGE Form 202 as required by 5 C.F.R. § 2638.206(a), the contracts law attorney completed the form with the OSI contact and referral information and emailed it to OGE</p>
<p>As of 12/31/2021, only one of the two cases requiring an OGE Form 202 were referred to OGE. As a result, OIG implemented a review process to identify potential cases that require an OGE Form 202 referral prior to the end of the calendar year. The additional OGE Form 202 is being reviewed and is pending referral to OGE</p>
<p>We contacted our OGE desk officer for advice on how to proceed. The instruction was to first contact the relevant U.S. Attorney's Office, which we did. Due to subsequent events, the matter resolved itself and the U.S. Attorney's Office decided to "stand down."</p>
<p>Notification did not take place in 2021 due to an administrative oversight but was provided in 2022 once the omission was discovered.</p>
<p>NRC OIG will submit OGE Form 202 parts 1 and 2. Part 3 not required.</p>

Question 45 Table 2

<p>There were no referrals.</p>
<p>No referrals.</p>
<p>No referrals</p>
<p>Did not have any</p>
<p>Referrals were to DOJ OIG.</p>
<p>None made.</p>

Not applicable because no covered referrals were made to DOJ.
No Referrals or dispositions

Additional Comments Part 10

DFAS HR Generally does not use violations of the standards of conduct as basis for our disciplinary actions unless there is a direct violation of an ethics rule or regulation. There were no such violations that resulted in disciplinary action in 2021.
Regarding Q# 43 - Army leadership disciplined an officer under the criminal Uniform Code of Military Justice, Article 15, for his violation of title 18, Section 208.
Question 44(c)(iii) and (iv): One of the cases referred to DOJ included potential violations of 18 USC 207 and 18 USC 208. The individual left the agency before a determination could be made as to whether or not to take disciplinary action under 18 USC 208, and there was no option for disciplinary action under 18 USC 207.
Q42 Employees can be charged with violations of more than one Subpart.
Items 44 and 45. DOL ethics program staff refers such matters to the OIG and, under DOL policy, the OIG refers the matters to DOJ and OGE as appropriate.
Question # 43 reflects a disciplinary action taken in 2021, which was a result of a matter referred to DOJ and reported to OGE in a prior year.
#44 The referrals involved (1) a failure to file, (2) outside activities, and (3) section 207.
For Question 45- No new referrals in 2021, but Part 2 of OGE Form 202 submitted for a pending matter that concluded in 2021.

Question 47 Table 1

One appointee departed CEQ without signing the pledge. CEQ has revised and improved internal workflows to better track ethics pledge execution.
Employee did not sign in 2021 because of an administrative oversight. The employee has since signed the Pledge and has been in full compliance with the Pledge since the employee's appointment.

Question 47 Table 2

OVP had six (6) full-time appointees, one (1) Executive Branch and five (5) Senate employees, who served for a term of less than 6 months. White House Counsel's Office and OVP Counsel determined that these employees were not required to sign the Ethics Pledge.
Presidential appointees who are career civil servants detailed from other federal agencies were not required to sign the Ethics Pledge (although some did so).
The PA was appointed at the end of 2021 and was not required to sign the Ethics Pledge until 2022.

Question 47 Table 3

Pledge collection for some new appointees is still underway. All appropriate Pledges will be collected.
47 a ii See above for the other discrepancies of numbers.
#47a iv employee exempted from filing OGE-278 due to grade and duties were identified as strictly administrative.
N/A - Not that the holdover appointee is not included in the above totals but did re-sign ethics pledge in 2021
The PA was appointed at the end of 2021 and was not required to sign the Ethics Pledge until 2022.
Presidential appointees who are career civil servants detailed from other federal agencies were not required to sign the Ethics Pledge (although some did so).
The one Schedule C employee who did not sign the pledge upon appointment to the Bureau joined from another agency without a break in service. That employee signed the pledge at their prior agency in 2021.

Question 48 Table 1

Two holdover appointees were in the process of departing the Agency at the time of the 100-day deadline in May, 2021. One filer left on May 20, 2021, and the other filer left on June 5, 2021. While they were advised to sign the Ethics Pledge consistent with OGE guidance, they did not sign prior to their departure.
Our HR did not have our Acting Secretary John Roth sign the ethics pledge as a holdover PAS. He held over from 20 January 2021 until 28 July 2021 and stepped down when HON Kendall was confirmed as SecAF.

Oversight - we believed that the holdover appointee was staying for less than 100 days and failed to closely monitor day count.
The Department of the Navy had one holdover appointee who served longer than 100 days in the current administration. The appointee was pursuing a waiver per LA 09-014 however, he resigned his position prior to the waiver being submitted/approved.
Admin oversight
Both in place for more than 3 years.
The employees apparently were not aware of the requirement.
The PCLOB only had one Presidential appointee who met the holdover appointee definition. That appointee resigned in June, 2021, prior to the arrival of the current DAEO. Our office does not have a record of whether the appointee signed the pledge.
60 day SGEs not required to sign.
Each appointee was a Schedule C who was identified prior to the 100-day mark, but did not depart until 5/30/2021.

Question 51 Table 1

Pledge paragraph 3 not reasonably expected to limit participation in any agency matters and employees operating under existing disqualification(s). Blanche Roblero Rachel Niebling C J Powell Katherine Neas Valerie Williams Meaghan Whittaker
DOE appointed one former federal registered lobbyist in CY 2021. After appropriate coordination and in accordance with DOE's procedures: (1) DOE confirmed that the appointee did not need a waiver of Paragraph 3 of the Ethics Pledge and (2) DOE provided extensive written legal advice to the appointee concerning participation restrictions under the pledge.
Sarah Brundage - Pledge paragraph 3 not reasonably expected to limit participation in any agency matters because appointee's duties sufficiently unrelated to prior lobbying activities. Damon Smith - Pledge paragraph 3 not reasonably expected to limit participation in any agency matters because appointee's duties sufficiently unrelated to prior lobbying activities.
Michael Zubrensky. Not in a PAS position and his duties are unrelated to prior lobbying activities.
Celeste Drake was provided a waiver of Pledge Paragraph 3
Alethea Predeoux. Waiver of paragraph 3 of the Ethics Pledge issued.

Ms. Kristine Lucius does not have an ethics agreement addressing obligations under paragraph 3 of the Ethics Pledge because she was granted an Ethics Pledge Waiver for paragraph 3.

Erika Moritsugu does not have an ethics agreement addressing obligations under paragraph 3 of the Ethics Pledge because she was granted an Ethics Pledge Waiver for paragraph 3.
Jonathan Su does not have an ethics agreement addressing his obligations under paragraph 3 of the Ethics Pledge because his duties are unrelated to his prior activities while registered under the Foreign Agents Registration Act and accordingly, paragraph 3 is not reasonably expected to limit his participation in any agency matters.

Part 11 Comments

No PAS or EO employees.

47ii. The four employees that were required to sign the pledge in 2021 but signed in 2022 signed an outdated version of the ethics pledge distributed by the Office of Human Resources. The four employees signed the correct ethics pledge in January 2022.

Q49-51: The ethics office does not track this data.

#49. Number of lobbyist is not tracked. #50 Standard practice is to have all political appointees from private sector sign ethics agreement.

Response to Question #47. The nine PAS appointees include five individuals that held noncareer-SES positions at the Department and signed the Ethics Pledge upon their initial appointment. These five individuals assumed PAS positions without a break in service and as such, these five individuals were not required to sign the Ethics Pledge a second time and are identified in Row v of the PAS column.

In addition, 45 appointees reflected in the table above were initially appointed to the Department using temporary transition appointing authorities and signed the Ethics Pledge upon the initial temporary appointment. Each of the 45 temporary appointees were later converted to Schedule C appointments or Noncareer SES appointments without a break in service and as such, these individuals were not required to sign the Ethics Pledge a second time. The entries for each of the 45 individuals appointed using temporary appointment authorities are reflected in the column for the position to which the individual was ultimately appointed, either Schedule C appointments or Noncareer SES. Response to Question #53. DOI has received certain information indicating that Ethics Pledge violations may have occurred in 2021 and is currently reviewing available information to determine whether there were any violations of the Ethics Pledge.

47(a)(v). Two appointees signed the Ethics Pledge as Non-Career SES but were later confirmed as PAS. They were not required to re-sign the Pledge.

#48 - Note that a member of the Agency's Board of Directors term expired and is being considered for re-nomination. The individual stayed in their position for a six-month period beyond January 20, 2021 based solely on Section 3(c)(8)(E) of the Agency Charter, not at the request of the current Administration.

#48 - Director of IMLS serves in a term appointment

Q47: As a matter of policy, all OVP employees, whether funded by the U.S. Senate or the Executive Branch are required to abide by the Ethics Pledge. Senate staff are reflected in the "Other" category. Q49: While Ms. Kristine Lucius is an OVP employee, her employment is funded by the U.S. Senate, which technically means that she is not an "appointee" as defined in the Executive Order. OVP has determined, however, that as a matter of policy, all OVP employees, whether funded by the U.S. Senate or the Executive Branch, are required to abide by the Ethics Pledge.

#48. The Board consists of 5 SGEs. All are term appointees and so do not appear to qualify as 'holdover appointees'. None work more than 60 days/year on Government business.

Question 56 Table 1

We have over 50 FACA advisory committees that do not all consistently meet or otherwise have staggered appointments. Therefore, it is difficult to capture precise data or to the extent training was required, why it was not taken for specific committee members, however our commitment to ethics training for our committees is seen through our improvement from last year and use of an automated platform to deliver initial and annual training and financial disclosures.

The Human Resources appointment process for USDA FACA and non-FACA SGEs made it difficult for the Office of Ethics to receive timely information needed to notify filers of the training requirement and track completion thereof.

On February 2, 2021, the Secretary of Defense concluded all DoD FACA and Advisory Committee appointments as part of a "Zero-Based Review" of all Department of Defense FACA/advisory committees. Most of the affected SGEs had not taken initial ethics training before their dismissal on this date.

Due to scheduling conflicts, 4 members were unable to attend scheduled meeting. Ethics office following up with DFO regarding scheduling training for these members.

One committee didn't meet in 2021. The SGE who has not completed IET did not participate in Department business.

One SGE was in the hospital due to serious illness and received training one month late.
BOP: No meetings due to COVID. FBI: An SGE was appointed but did not serve.
OSHA program for CY 2021 closed/cancelled due to COVID
During the gathering of statistics for the questionnaire, the ethics office could not confirm this person was not provided IET. As of submission date, no confirmation has been made for compliance. Going forward, the ethics office has assigned a staff member who will remain fully engaged to ensure compliance is completed.
Certain SGEs completed IET after the first meeting because of a breakdown in tracking the first meeting of calendar year 2021 for SGEs appointed to multi-year terms of service. Each of the 6 SGEs who received IET after the first meeting had completed ethics training in prior years and completed ethics training in 2021.
Due to a miscommunications between a component's program office and the ethics office, one SGE did not receive IET until after the first meeting.
One SGE did not report to any meetings.
13 SGEs did not complete initial ethics training in 2021. 12 Expert/Consultants completed Annual Ethics Training and are accounted for in Q. 20(b).
There was a transition in the attorneys providing ethics guidance to the commissioners and training was not completed in 2021. This has been addressed for 2022.
Two SGEs were late in submitting their ethics training which was provided as a handout in a timely manner before the first meeting of the year.
SGE is a continuing member of a board that meets monthly. OMB provides SGE with training on an annual basis, but not always before the January meeting. SGE should have taken annual training, but did not. Training will be provided early in 2022.

Question 57 Table 1

One SGE was unable to file a report due to medical reasons.
We have over 50 FACA advisory committees that do not all consistently meet or otherwise have staggered appointments. Therefore, it is difficult to capture precise data or to the extant training was required, why it was not taken for specific committee members, however our commitment to ethics training for our committees is seen through our improvement from last year and use of an automated platform to deliver initial and annual training and financial disclosures.
One SGE filer whose report was due on 12/16/2021, did not submit their report until 1/7/2022. Because of this, that filer's report will be counted on the Agency's 2022 Annual Questionnaire. Additionally, another SGE filer who submitted their report on 8/18/21 was sent multiple follow-up

emails by ethics staff requesting information. That filer asked if he could respond by 10/28/21, however, he did not respond with that information until 1/19/2022.

The SGE who did not timely file is a member of one of the Bureau's advisory boards. The advisory board historically meets twice per year. This SGE participated in an orientation session on September 13, 2021, during which they received IET pursuant to 5 C.F.R. 2638.304(b)(2). The SGE subsequently participated in one council meeting on November 5, 2021. The SGE received three system-generated reminders to file, after which Bureau Ethics staff reached out directly to urge the SGE to file, but those efforts were unsuccessful due to technical difficulties experienced by the SGE. Those issues were subsequently resolved and the SGE has since filed prior to the next scheduled council meeting.

Despite repeated filing notices and follow ups from Office of Ethics leadership, some SGEs failed to complete their OGE 450 reports as required.

HR did not notify the ethics division that unpaid/paid consultants were onboarded

On February 2, 2021, the Secretary of Defense concluded all FACA/Advisory Committee appointments as part of a "Zero-Based Review" of all Department of Defense FACA/advisory committees. Most of the affected SGEs had not been required to file a new entrant financial disclosure report by that date. Also, several additional SGEs concluded their service in CY 2021 and therefore did not need to file a new entrant financial disclosure report.

One ethics office is still working with a filer on an extremely complex report following the filer's transition of his portfolio from one brokerage to another.

Seven employees are non compliant.

Some FACA SGEs and one non-FACA SGE did not file reports and were not permitted to participate in any agency meetings or business. Five NDMS SGEs did not file reports and were made non-deployable and not allowed to perform any work for the Department.

One SGE is out on extended medical leave.

One SGE was appointed but did not serve. One is a noncompliant filer - collection efforts underway.

Due to COVID disruptions and adjustments to meeting schedule reports were sent late and reports have not been received by CY 2021

The Department continues to have problems with incumbent Fulbright Board Members who do not complete assigned New Entrant Reports despite reminders.

New DFO for one committee is trying to track down filers.

One 450 report was filed after December 31. One report is still outstanding. The filer is out of the country for an extended period and assures me that he will file his report upon his return.

21 Proposed SGEs filed their reports in 2021, but their appointment did not occur until 2022. Two FACA SGEs did not file their OGE 450 forms by December 31, 2021 and are not believed to have participated in

any FACA meetings in 2021 and their forward status is being assessed. Five non-FACA SGE's were not requested to file per NASA internal directive due to a requirements misunderstanding.

There was a transition in the attorneys assigned to the SGE commissioners and the annual forms were not collected in calendar year 2021. This issue has been identified as part of an agency program review and the agency has taken steps to remedy the issue.

692 arts advisory committee members filed OGE approved alternate forms. No current NCA members were required to provide their forms. 11 nominees for membership of the National Council on the Arts filed forms which were reviewed in due course - none of these employees have started their duties yet and have not been required to file further disclosures.

One Commission Member failed to file a report for 2020. The DAEO has requested that Speaker Pelosi's office replace this person as there are challenges each year with getting the 450 from this individual.

The SGEs were granted an agency extension to February 15, 2022 to file their annual reports. SGEs were previously filing their reports at the end of the calendar year. The new reporting will put the SGEs on the same schedule as EAC employee confidential filers.

On July 26, 2021, we sought an opinion from the Office of Legal Counsel (OLC) on a disagreement between the Postal Service and the Office of Government Ethics on the definition of a public filer. We had not received a written opinion on the matter by December 31, 2021. One of the two employees voluntarily decided to file a public report instead of waiting for resolution of the matter.

One SGE is a blind person and requires adaptive equipment. The SGE has experienced persistent network accessibility issues. Additionally, the SGE has to use the services of a human "reader" to assist with form preparation however, due to the ongoing pandemic the SGE is not comfortable allowing people into his home.

Question 58 Table 1

One USCCR Commissioner did not file on our online system, FD Online, and instead used a paper disclosure, which he filed late. His lack of use of an online system made tracking difficult.

At current staffing levels, each financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly 900 OGE-450 reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This very large report volume combined with a very large client population (~5,000 employees per advisor) makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics is one of the least resourced Ethics Offices of any Executive Branch Department.

We were unaware of the unpaid/paid consultants OGE Form 450s (there were a total of 6 at the HQ level).

The Department of Defense requires that supervisors review reports in addition to the command ethics counselor and DAEO. In some cases, the multiple levels of review delays the ethics counselor's initial

<p>review. Furthermore, it is possible that some ethics counselors completed their initial review within the 60 days but forgot to enter the date on the General Information page. This is the Department of the Navy's second year using the Integrity system and while the Office of the Assistant General Counsel has issued program guidance on when and how to end initial review, the fact that a command's ethics counselor may change from year to year, impacts the corporate knowledge on proper use of Financial Disclosure filing systems.</p>
<p>One filer with an extensive portfolio requiring a significant amount of time to ensure information is accurate.</p>
<p>Reasons include seeking additional information from filers, seeking guidance from OGC ethics officials, and staffing shortages.</p>
<p>Waiting for additional information, reviewer workload. One SGE left while report was still being finalized.</p>
<p>Additional information was requested.</p>
<p>One public report was provided late to EPA Ethics for review. One confidential report wasn't reviewed timely due to a miscalculation of the 60-day date.</p>
<p>Intermediate review was completed by FACA Designated Federal Officer (DFO) more than 60 days after submission in 14 cases, and final review was completed more than 60 after submission in 35 additional cases. Review on 1 board member was completed at 62 days. 12 FACA and 2 Expert reports were not certified in 2021.</p>
<p>Failure to certify one report in a timely manner was the result of delayed provision of additional information requested.</p>
<p>see below for explanation in "Specify Other" field</p>

Question 58 Table 2

<p>One report was not certified within the 60-day period due to an oversight, but was subsequently certified within one week of the deadline.</p>
<p>One USCCR Commissioner did not file on our online system, FD Online, and instead used a paper disclosure, which he filed late. His lack of use of an online system made tracking difficult.</p>
<p>Gov't-wide FACA stand-down. HR did not notify the ethics division that unpaid/paid consultants were onboarded thus, his/her OGE Form 450s were not certified by an ethics counselor</p>
<p>The Department of Defense requires that supervisor review reports in addition to the command ethics counselor and DAEO. In some cases, the multiple levels of review may delay the DAEO final certification.</p>
<p>Other reasons include staffing shortages and difficulties moving paper forms between reviewers.</p>

delay due to priority Presidential transition
#55 - IMLS, as a federal grant-making agency, operates a peer-review system. Peer-reviewers, as SGEs, complete ethics training and submit an OGE approved conflicts of interest certification.
For the FACA SGE reports -- One attorney was away from the office serving on military duty for six months and a second attorney was detailed to a developmental assignment. It took six months to hire and onboard a new attorney to address the shortfall.
Advisory committee alternative 450 reports were the only sGe forms not reviewed or certified within 60 days. Committee #1: The DFO and administrative staff with historical knowledge of the process left the Foundation in 2021. Although financial disclosure forms were collected, they were filed - not reviewed or certified until much later than 60 days (20 reports). Committee #2: New personnel were assigned to manage the committee. Forms were collected and filed on a shared drive, but not reviewed or certified (13 reports). The remaining seven were not reviewed and certified timely because of administrative error. The pandemic has been challenging for advisory committees having to deal with paper forms. As mentioned last year, we are seeking an electronic solution for advisory committee collection, review and certification of financial disclosure reports.
The agency has seen a large influx of new employees, which has increased filings. The agency saw a 25% increase in total OGE278 filings and a 34% increase in total OGE450 filings this year. The DAEO is the final certifying authority for the agency and that individual has been serving as acting agency head for almost all of 2021.

Additional Comments Part 12

Q57-60: ACUS SGE's are not required to file the Form 450 or 278e. They are required to notify the chairman of any financial or other conflicts of interest per ACUS's bylaws.
USADF received past recommendation from OGE that its SGEs not provide financial disclosures on an annual basis because of their SGE status. USADF incorporated OGE's guidance in its internal policy on financial disclosures (MS-450), most recently reviewed by OGE during its 2017 program inspection.
One USCCR Commissioner did not file on our online system, FD Online, and instead used a paper disclosure, which he filed late. His lack of use of an online system made tracking difficult. He was granted extensions until August 15, 2021, and a fee waiver under 5 CFR Â§ 2634.704(a)(2) was considered in August 2021. He submitted his completed Form 278 on November 23, 2021.
Question #57 One SGE filer whose report was due on 12/16/2021, did not submit their report until 1/7/2022. Because of this, that filer's report will be counted on the Agency's 2022 Annual Questionnaire. Additionally, another SGE filer who submitted their report on 8/18/21 was sent multiple follow-up emails by ethics staff requesting information, and only responded with that information on 1/19/2022.
The Secretary of Defense ordered a FACA standdown at the end of January 2021. Air University Board of Visitors (BOV) and the Scientific Advisory Board were instructed to terminate all members therefore no

SGEs were appointed in 2021 from those two boards. The USAFA BOV had 8 members appointed at the end of CY21, but the USAFA BOV did not have quorum to hold a meeting, therefore, no administrative requirements were met.

Q. 56.a: In CY21, most DON Federal Advisory Committees did not have appointed SGE members. Q. 55.-58: One DDAEO organization had a significant increases in SGE appointments for 2021. All appointed SGEs are in the "other" category. Q. 59: There are 12,919 reserve officers that are excluded from the SGE financial disclosure filing requirement unless their job duties require that they complete a financial disclosure report.

Q59: One component maintains a pool of SGEs ready to serve on FACA committees. These SGEs are exempt from confidential financial disclosure filing requirements until they are actually placed on a committee. Other exempt SGEs are primarily employed through the National Disaster Medical System (NDMS) to respond to major disasters.

Response to Question #55. DOI reported 114 total SGEs in response to this question because 114 individuals were appointed to serve as SGEs in prior years to multi-year or open-ended terms of appointment. Nine individual SGEs resigned their positions as SGEs during calendar year 2021. Of those nine individuals, four served on a board that did not meet in 2021 and five individuals resigned prior to the first meeting of 2021.

Some SGE financial disclosure reports were not filed timely and/or were not reviewed/certified timely. Consequently, EPA Ethics is updating its SGE guidance for Designated Federal Offices and DEOs (including directors of the HR shared service centers) and will provide outreach and training on SGEs in 2022.

For Part 12, the four (4) SGEs brought on in CY20 each had their term expire in CY21 and were not extended. Initial training occurred in CY20.

FHFA has no SGEs

#59 - IMLS has one (1) IMLS Board member that is not required to file/train due to permanent medical condition. IMLS must keep this Board member on its roster until properly replaced by a new Presidential appointee.

Q. 55 includes the 12 experts/consultants, 1 board member and 144 FACA members. Q. 56 includes 144 FACA members and 1 board member. Q. 57 includes the 144 FACA members, 21 proposed FACA members, 1 board member and 7 expert/consultants. Q. 59 includes the 5 expert/consultants not required to file a financial disclosure report due to a requirements misunderstanding.

One SGE requested and received an extension.

The NEA employs a large number of SGEs as part of FACA committees to fulfil its grantmaking functions. This year, there were 692 SGEs serving on the Arts Advisory FACA Committee, and 16 individuals serving on the National Council on the Arts (NCA). Two new NCA members were confirmed by the Senate National Council on the Arts - one of whom will replace a departing member - but these members were

confirmed after the final meeting of the year and have not yet been appointed. They will be included in next year's questionnaire.

In 2021, NEH hired a number of temporary employees to assist in the administration of a special appropriation the agency received under the American Rescue Plan Act of 2021. These employees qualified as special Government employees. Accordingly, the agency employed an unusually large number of SGEs in 2021, and expects to employ a smaller number in 2022.

Question 55: In late 2020, NSA undertook a periodic refresh for its non-FACA advisory committee membership. While that was still underway, a Department-wide zero-based review of advisory committees was ordered in January of 2021 by the DoD, which required suspension of operations. This is the reason for the significant difference in SGE numbers from 2020 to 2021.

The SEC had no SGEs who were OGE Form 278e Filers during 2021. The SEC had two SGEs who were OGE 450 Filers during 2021 (neither was on a board, commission or committee). The second SGE was hired on 11/22/2021 and was granted a 16-day extension, so OGE 450 was not due until 1/7/2022 and is not included in the number required to file by 12/31/2021 he actually filed on 1/3/2022.

In early 2020, all Department of Defense FACA boards were disbanded in conjunction with a DoD-wide Zero-Based Review of all Federal Advisory Committees within the DoD. USU's Board of Regents, a FACA board, was disbanded under this in early 2020 and as of December 31, 2021, nominations and appointments to the Board had not occurred.

The 450 form covering calendar year 2020 was never received from one Commission Member. The DAEO has requested that Commission Member be removed from the Commission.

Extension granted to one SGE who is blind and has experienced persistent network accessibility issues.

Q57: The 36 SGEs who served on a Federal Advisory Committee were members of the Presidential Commission on the Supreme Court of the United States.

Annual Questionnaire Comments

Reporting on this Annual Questionnaire also includes data from the Pretrial Services Agency (PSA) for the District of Columbia, a federal independent agency within CSOSA.

In calendar year 2021, the DOI ethics program has continued its efforts to maintain and improve the efficiency, consistency, and accountability of all ethics services provided to all DOI employees in every Bureau and Office. To that end, ethics officials have diligently worked to maintain compliance rates for collection, review, and certification of public and confidential financial disclosure reports and annual ethics training. In addition, ethics officials have significantly improved regulatory compliance in timely completing of initial ethics training for employees and special Government employees appointed at the Department. The ethics program work reflected in this Annual Questionnaire is the result of the efforts and diligence of DOI ethics officials. In 2022, the DOI ethics program will continue its work to maintain the public trust and confidence in the integrity of government and the work of the Department's employees, at every Bureau and Office.

The ethics office is in the process of consolidating all ethics policies and procedures into one directive chapter accessible to all employees so all are aware of their (and others') responsibilities