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The Erosion of Agency Ethics Programs

Office of Government Ethics 2025 Annual Questionnaire Findings

Campaign Legal Center analyzed the data the U.S. Office of Government Ethics (OGE) published related to the current state of federal agency ethics programs under President Trump. What emerged is a systemic erosion of ethics programs across the executive branch, including reduced compliance with federal ethics rules and a persistent failure to report and prosecute ethics violations in 2025.

Over 140 offices and agencies in the executive branch are required to annually report to the OGE on the overall status of their ethics programs, including the number of ethics officials employed within the agency; the rate of financial disclosure compliance; the number of criminal statute waivers issued; and the number of referrals sent to the U.S. Department of Justice (DOJ). This data provides important insights into the overall wellness of the federal government's ethics program and how individual agencies are monitoring and preventing corruption within the executive branch.

AS DESCRIBED IN DETAIL BELOW, CLC FOUND THE FOLLOWING ANOMALIES IN THE 2025 ANNUAL AGENCY ETHICS REPORTS:

- 274 fewer ethics officials across the executive branch, with 40% of ethics programs reporting that they need more resources.
- 20% of Designated Agency Ethics Official (DAEO) positions were filled by political appointees in 2025 instead of career public servants, an increase from the 14% of DAEO positions that were filled by political appointees in 2024.
- 9% of lead ethics positions were vacant, when only 2% of these same positions were vacant in 2024.
- 418 public financial disclosure reports were never filed in 2025, up from 110 missing public financial disclosure reports in 2024.
- Only 82% of public filer Special Government Employees (SGEs) complied with their financial disclosure requirements in 2025, down from 100% compliance in 2024.
- 249 criminal statute waivers were issued in 2025, a significant jump from the average of 120 waivers issued annually between 2021-2024.
- The DOJ declined to prosecute significantly fewer criminal ethics violations in 2025 than in years past.

There are fewer ethics officials in the executive branch overall

Executive branch ethics officials are responsible for counseling government employees on possible ethics concerns; reviewing financial disclosure forms; training government officials on their ethics obligations;

and advising government employees on how to resolve ethics violations. These ethics officials are central to preventing corruption throughout the federal government.

Despite their critical role, President Trump's cuts to the federal workforce contributed to significant reductions within government ethics programs. There are now **274 fewer full-time ethics officials** across the executive branch. **Forty percent of executive branch ethics offices** reported that they **need more resources** to effectively run their programs. Some of the most significant reductions in ethics staff occurred in cabinet-level agencies: the Department of Education lost 60% of its ethics staff in 2025, the Department of Treasury lost 44%, and the Department of the Interior and the Department of Health and Human Services both lost approximately 31%. Other federal agencies with significant reductions in ethics staff include the Equal Employment Opportunity Commission (58%), Environmental Protection Agency (48%), and the Small Business Administration (39.7%). Even the White House has seen a steep decline in its ethics staff: while there were 18 ethics officials installed in the White House in 2024, there were only 4 in 2025.

Ethics leadership in the executive branch has been significantly disrupted

Federal agency heads appoint DAEOs to oversee the ethics programs within each agency. DAEOs are responsible for directing the daily activities of agencies' ethics programs, including the collection and review of financial disclosure reports, evaluating and remediating conflicts of interest, and providing ethics education, training, and advice to federal employees. Importantly, DAEOs are expected to build and sustain an ethical culture in their agencies by demonstrating the required knowledge, skills, and abilities needed to run effective ethics programs Furthermore, DAEOs must have the necessary qualifications to fulfill their roles, such as a deep understanding of the complex ethics laws and regulations that apply to federal employees.

In the past, DAEO positions were rarely filled by political appointees in order to prevent the politicization of government ethics programs and ensure that they had the requisite knowledge and skills necessary to hold such high-level positions. President Trump's administration has broken with this tradition: in 2025, **20% of DAEO positions were filled by political appointees**. These newly appointed DAEOs can be found within the Department of Homeland Security, the Department of Energy, the Department of Veterans Affairs, and the Federal Communications Commission, among others. The current DAEOs of the Department of Homeland Security, the Department of Education, the Office of the U.S. Trade Representative, and the Department of Energy appear to have no prior federal ethics experience whatsoever.

In addition to more politically appointed DAEOs throughout the executive branch, there is an increased number of vacancies within ethics leadership. **Nine percent of DAEO positions were vacant in 2025**, when only 2% of these same positions were vacant under President Biden in 2024. Several prominent federal agencies reported having no head ethics official at all in 2025, including the Central Intelligence Agency, the Department of Health and Human Services, the Department of Labor, and the Department of Treasury.

Federal ethics programs are seeing a decrease in financial disclosure compliance

Financial disclosure is one of the primary methods that ethics officials monitor and prevent corruption from arising among government employees. Federal employees' compliance with financial disclosure rules ensures that ethics programs run smoothly and preserves transparency within government operations. Public financial disclosure reports are especially important, as these are disclosures made by high-level officials making significant decisions within the federal government.

Over the course of 2025, ethics officials have seen a significant reduction in the rate of compliance with financial disclosure laws, particularly among public filers. **418 public financial disclosure reports were never filed in 2025**, up from 110 missing public financial disclosure reports in 2024. Furthermore, there has been a considerable drop in the rate of public filer SGEs fulfilling their financial disclosure obligations: In 2025, **only 82% of public filer SGEs complied with their financial disclosure requirements**, down from 100% compliance in 2024. These numbers suggest that there may be ethics violations occurring without any oversight within the federal government, especially amongst senior-level officials.

There has been an increase in the number of criminal ethics waivers issued

Federal agencies have the right to waive criminal conflict of interest violations in specific circumstances, such as when an employee's conflicting financial interest is unlikely to affect the integrity of their government services. Such waivers are only supposed to be issued in very rare circumstances. Despite this, agency ethics officials under President Trump have issued far more criminal statute waivers than in years past: **249 waivers were issued in 2025**, a significant jump from the average of 120 waivers issued annually between 2021-2024. This suggests that federal ethics officials are more readily waiving criminal ethics concerns for government employees, excusing them from ethics requirements and oversight in key government operations.

The Department of Justice declined to prosecute a record number of criminal ethics violations

Federal agencies are required to refer criminal ethics violations to the DOJ for further investigation and possible prosecution. A single referral to DOJ may involve multiple violations, statutes, and individuals. The DOJ has the right to decline to prosecute ethics violations for any number of reasons, including insufficient evidence or because a case is not a priority for enforcement.

The DOJ declined to prosecute more criminal ethics violations in 2025 than in years past. In 2025, federal agencies **referred 141 criminal ethics violations to the DOJ**, **94% of which were declined for prosecution**. Comparatively, during the Biden administration, federal agencies referred an average of 56 criminal ethics violations to the DOJ per year. The sharp increase in the number of referrals to the DOJ in 2025 can be directly attributed to the **Department of the Treasury**, which **referred 81 criminal ethics violations in 2025 alone.** Of these 81 referrals, **the DOJ declined to prosecute all but six.** This data illustrates the DOJ’s waning interest in investigating and prosecuting criminal ethics violations within the federal government, allowing corruption to go unchecked and unmonitored.

This data exposes an executive branch ethics program that is understaffed and poorly equipped to prevent corruption within the federal government. Staffing cuts, limited resources, and declining compliance with ethics rules are all significant concerns for the overall health of the federal government.