

CONGRESSIONAL BUDGET JUSTIFICATION,  
**ANNUAL** PERFORMANCE PLAN &  
PERFORMANCE REPORT

FISCAL YEAR  
2018

PREPARED FOR THE  
COMMITTEE ON  
APPROPRIATIONS  
MAY 2017

OGE

# MISSION

PROVIDE OVERALL  
LEADERSHIP AND  
OVERSIGHT OF THE  
EXECUTIVE BRANCH  
ETHICS PROGRAM  
DESIGNED TO  
PREVENT AND  
RESOLVE CONFLICTS  
OF INTEREST

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# UNITED STATES OFFICE OF GOVERNMENT ETHICS

## Section I – About OGE

The U.S. Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978, provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE’s mission is part of the very foundation of public service. The first principle in the Fourteen Principles of Ethical Conduct for Government Officers and Employees is, “Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.” Public servants are expected to make impartial decisions based on the interests of the public when performing their job duties. OGE, in concert with agency ethics practitioners throughout the executive branch, ensures that employees fulfill this great trust.

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the more than 4,500 ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and provides technical assistance to state, local, and foreign governments and international organizations.

OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, and support personnel. OGE’s workforce has a strong sense of purpose and demonstrates a strong commitment to the organization. OGE’s results in the Federal Employee Viewpoint Survey Engagement Index support this assertion. OGE tied for 5<sup>th</sup> place, government-wide, on the Employee Engagement Index.

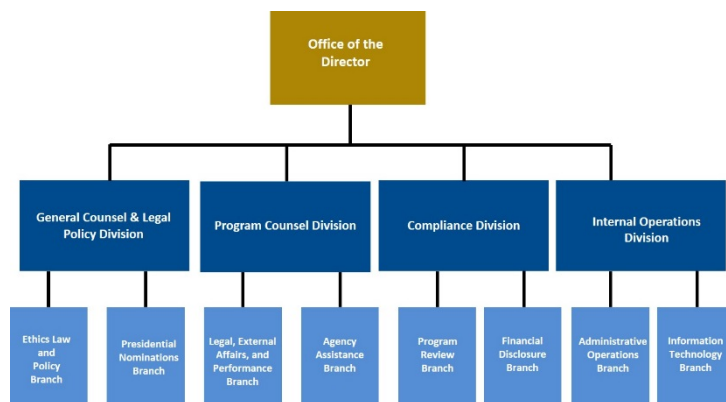


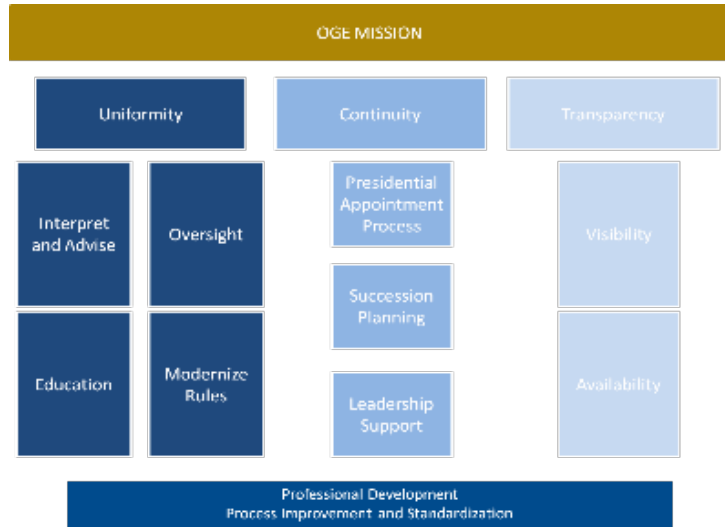
Figure 1: OGE Organizational Chart

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate. As shown in the organizational chart in Figure 1, in addition to the Office of the Director, OGE is divided into four divisions that work in concert to carry out OGE’s mission.

## Long-Term Strategic Goals

When government decisions are made free from conflicts of interest, the public can have greater confidence in the integrity of executive branch programs and operations. The three strategic goals of OGE’s strategic plan for fiscal years 2014 through 2018 – uniformity, continuity, and transparency – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. See Figure 2. OGE’s budget priorities for fiscal year 2018 support achievement of these strategic goals.

In order to develop meaningful strategic goals, OGE consulted with internal staff, Congress, executive branch ethics officials, non-governmental organizations, and the general public. OGE incorporated feedback received from these groups. The daily work of OGE is driven by the strategic objectives and performance goals established under each of the overall strategic goals set forth below.



**Figure 2: OGE’s Fiscal Year 2014 – 2018 Strategic Goals**

1. *Advance a strong, uniform executive branch ethics program:* OGE interprets and advises on ethics laws, policies, and program management issues; holds executive branch agencies accountable for carrying out effective ethics programs; contributes to the professional development of ethics officials; and modernizes and implements the ethics rules and regulations.
2. *Contribute to the continuity of senior leadership in the executive branch:* OGE assists the President and the Senate in the nomination process for Presidential appointees requiring Senate confirmation; supports succession planning in executive branch ethics programs; and promotes leadership support of the executive branch ethics program overall.
3. *Promote transparency of the executive branch ethics program:* OGE raises the visibility of the executive branch ethics program and ensures that ethics information is publicly available to increase public confidence in the integrity of government decision-making.

Starting on page 9, this document describes the specific work OGE will undertake in fiscal years 2017 and 2018 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward achievement of its strategic objectives.

## Section II – Budget Request Overview

### Appropriations Language

For necessary expenses to carry out functions of the Office of Government Ethics, pursuant to the Ethics in Government Act of 1978, the Ethics Reform Act of 1989, and the Stop Trading on Congressional Knowledge Act of 2012, including services as authorized by 5 U.S.C. 3109, rental of conference rooms in the District of Columbia and elsewhere, hire of passenger motor vehicles, and not to exceed \$1,500 for official reception and representation expenses, \$16,439,000.

### Budget Request Overview Narrative

OGE requests \$16,439,000 to fund its core mission-related work in fiscal year 2018—responsibilities that include leadership and oversight of the executive branchwide ethics program. OGE’s request maintains overall fiscal year 2016 expenditure levels, with the exception of an additional \$697,000 to fund a planned cyclical investment in Information Technology (IT) necessary to support OGE’s important mission-critical work and to mitigate risk to OGE’s operations. OGE continues to be a strong fiscal steward of taxpayer dollars and has taken full advantage of the efficiencies and cost savings associated with the use of shared services, space consolidation, and streamlined operations. Nevertheless, at this funding level OGE will need to carefully prioritize in order to ensure that its critical functions are performed.

OGE’s statutory responsibilities include promulgating and maintaining enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; overseeing a financial disclosure system for more than 26,000 public and 380,000 confidential financial disclosure report filers; ensuring agency ethics programs are in compliance with applicable ethics laws and regulations; providing education and training to the more than 4,500 ethics officials; conducting outreach to the general public; and providing assistance to state, local, and foreign governments and international organizations.

In fiscal year 2018, OGE will need the full complement of its requested resources to support these responsibilities, recognizing that tradeoffs and shifts in mission priorities will still be necessary. Most important of these priorities in fiscal year 2018 is OGE’s ongoing and significant role in supporting the President’s constitutional duty to nominate and appoint officers to the highest positions in the executive branch. OGE’s workload increases exponentially following the election of the new Administration and is expected to continue at a very high volume through fiscal year 2018. OGE staff and systems must be at least minimally resourced to ensure that the extremely complex financial disclosure reports of Presidentially appointed, Senate-confirmed (PAS) nominees are properly reviewed to ensure they are free of financial conflicts of interest, and promptly delivered to the U.S. Senate for consideration so that critical leadership vacancies may be filled.

*OGE's Four-Year Cyclical Plan for Information Technology Infrastructure Replacement Necessitates the Requested One-Year Funding Increase in Fiscal Year 2018*

In fiscal year 2018, OGE will reach the end of the four-year life-cycle for many of its IT infrastructure systems and associated equipment. OGE's last IT refresh occurred in fiscal year 2013-2014. The comprehensive replacement of OGE's IT infrastructure in fiscal year 2018 will require a one-year increase in funding. Notably, a strong IT infrastructure is necessary on a day-to-day basis to allow OGE to conduct its mission-critical work. This infrastructure must be timely upgraded to mitigate the risk of potential failure, to address evolving technology, and to prevent security breaches. As potential security threats against automated systems grow and become more complex, OGE must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated. To support this crucial effort, OGE is requesting \$697,000 in additional funding for necessary upgrades to its network infrastructure, laptops, and related peripherals, and software as reflected in the budget table in the equipment budget object class. All of these services, equipment, and supplies are necessary for the security and efficiency of OGE's ongoing daily operations – in particular, to ensure a safe and secure IT environment that protects the privacy and integrity of the financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch as part of the financial disclosure review process. As noted above, the additional amount requested to fund the IT infrastructure and systems replacement represents a one-year increase rather than a permanent increase in OGE's baseline budget request.

*OGE's Executive Branchwide Responsibilities Necessitate the Full Requested Funding*

OGE's important and unique responsibilities necessitate funding of at least \$16,439,000 for fiscal year 2018. With the exception of the one-year increase of \$697,000 justified above to fund the required, cyclical replacement of OGE's IT infrastructure and systems, OGE's request holds the agency to fiscal year 2016 expenditure levels despite unavoidable increases in OGE's nondiscretionary expenses and significantly increased workload. At this request level, OGE will be able to continue to operate *Integrity*, the electronic financial disclosure filing system used by the highest officials in the executive branch, barring any unforeseen technological issues or cyber threats. However, OGE will only implement planned modifications and improvements as resources permit. Likewise, OGE will maintain its current staffing level, which includes leaving 11% of its positions vacant. At this funding level, OGE will defer new initiatives and continue to seek out new ways to increase efficiency, recognizing that OGE will need to make tradeoffs in order to serve the executive branchwide ethics program and adjust its performance targets accordingly. OGE has already achieved substantial savings in administrative costs through the use of numerous shared services, space consolidation, and more efficient operations, and will continue to do so.

*Conclusion*

OGE respectfully requests fiscal year 2018 funding of \$16,439,000 to conduct its core mission work, including continuing its vital role in the effective transition of power after the 2016 Presidential election, and make a necessary investment in its IT infrastructure.

## Budget Request by Object Classification

The object classification table set forth below summarizes OGE's request (in thousands of dollars).

Table: Budget Request by Object Classification (in 000s)

		<b>2017 P.L. 114-254</b>		
<u>Object Class</u>		<u>2016 Enacted</u>	<u>Annualized CRA Level</u>	<u>2018 Requested</u>
11.1	Salaries	\$8,747	\$8,702	\$8,782 <sup>a</sup>
12.1	Benefits	\$2,450	\$2,679	\$2,626
21.0	Travel	\$21	\$15	\$10
22.0	Transportation (Freight)	\$6	\$2	\$2
23.1	Rental Payments to GSA	\$1,450	\$1,323	\$1,337
23.3	Communications and Utilities	\$121	\$104	\$114
24.0	Printing and Reproduction	\$65	\$19	\$66 <sup>b</sup>
25.2	Other Services	\$2,715	\$2,743	\$2,674
26.0	Supplies and Materials	\$115	\$87	\$93
31.0	Equipment	\$52	\$38	\$735 <sup>c</sup>
99.00	Subtotal	\$15,742	\$15,712	\$16,439
99.00	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$16,467	\$16,437	\$17,164

<sup>a</sup> Reflects 11% vacancy rate and 1.9% assumed pay raise.

<sup>b</sup> Reflects expected printing and publishing of statutory and regulatory materials; and notices in the *Federal Register* for key strategic and mission-critical revisions to ethics regulations.

<sup>c</sup> Includes \$697,000 for a comprehensive, 4-year life-cycle information technology infrastructure replacement, not a permanent increase in OGE's annual baseline budget request for equipment.



## Section III – Fiscal Year 2016 Performance Report and Fiscal Years 2017 and 2018 Performance Plan

OGE’s past and planned work reflect its commitment to fulfilling its vital mission of preventing conflicts of interest in the federal executive branch. Through its work, OGE strives to ensure the integrity of government programs and operations and to increase public confidence in the impartiality of government decision making. OGE translates its important mission into strategic goals and objectives. OGE then assesses its success in achieving these goals and objectives by measuring its progress on its performance goals.

Organized by strategic goal and objective, this section highlights both OGE’s major accomplishments and its progress toward achieving its strategic objectives in fiscal year 2016 as measured by its performance goals.<sup>1</sup> This section also describes OGE’s planned work for fiscal years 2017 and 2018. Information on how OGE will measure its progress toward achieving its strategic goals in fiscal years 2017 and 2018 can be found in Appendix A.

### Strategic Goal 1: Advance a strong, uniform executive branch ethics program

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE has identified four strategic objectives. These objectives are: (1.1) interpreting and advising on ethics laws, policies, and program management; (1.2) holding executive branch agencies accountable for carrying out an effective ethics program; (1.3) contributing to the professional development of ethics officials; and (1.4) modernizing and implementing the ethics rules and regulations.

#### *Strategic Objective 1.1: Interpret and advise on ethics laws, policies, and program management*

A uniform legal framework ensures that all executive branch employees are held to the same standards. By interpreting and advising on the ethics laws, regulations, and policies, OGE assists agency ethics officials in providing consistent and accurate counseling to their employees in order to prevent or remedy conflicts of interest.

#### Performance Highlights

##### *Assisted and supported agency ethics officials through OGE’s Desk Officer Program*

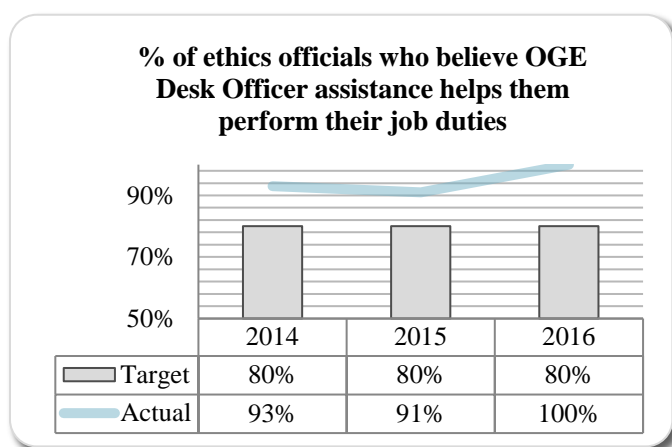
OGE is the supervising ethics office for a decentralized ethics community comprising thousands of ethics officials in over 130 agencies across the executive branch. OGE’s Desk Officer Program provides a vital communications link to this ethics community. OGE’s Desk Officers assist agencies in resolving difficult ethics issues requiring expertise that only the supervising ethics office can provide. In fiscal year 2016, OGE Desk Officers responded to approximately 1,700 requests for assistance from agencies. Desk Officers also proactively

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<sup>1</sup> The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual agency ethics program questionnaire, Google Analytics, and an annual survey of ethics officials to assess satisfaction with OGE’s services and products.

engaged with agency ethics offices, through in-person meetings, to provide expertise and support, to increase uniformity across agencies, and to raise awareness of the range and availability of OGE’s services. On several occasions, OGE Desk Officers met with new ethics officials to provide an overview of the requirements of the ethics program and to introduce them to the services provided by OGE.

In addition to sharing important information with ethics officials through its website, listserv, and MAX.gov, OGE Desk Officers continued to leverage the data gathered in its Agency Information Management System (AIMS) to gain insights about agencies, and to better tailor the support OGE provides. For example, OGE Desk Officers use data in AIMS about topics of agencies’ questions to recommend relevant OGE training offerings. AIMS data increases the ability of OGE Desk Officers to provide useful, direct support to their agencies.



**Performance Goal:** OGE surveyed ethics officials who requested assistance from OGE’s Desk Officers during fiscal year 2016 to measure the performance of its Desk Officer program. One hundred percent of survey respondents indicated that Desk Officers helped them to perform their job duties. Figure 3 shows that OGE exceeded its target on this goal.

**Figure 3: Desk Officer Assistance**

*Provided agencies with important legal and program guidance*

In addition to providing day-to-day assistance through the Desk Officer program, OGE issues legal and program advisories to disseminate critical information to the executive branch ethics community and to promote uniform interpretation of ethics laws, regulations, and policies. Advisories are an integral component of the body of interpretive and programmatic guidance that executive branch ethics officials rely on daily.

In fiscal year 2016, OGE issued 14 advisories. OGE chose to issue advice on topics to address subject matter of particular relevance during a Presidential transition, to respond to emerging ethics issues, and to respond to feedback from agency ethics officials about questions they received from employees. For example, OGE issued a legal advisory to support agency ethics officials in their efforts during the Presidential transition to counsel departing officials on post-government employment restrictions. The advisory is written in a plain English format and provides guidance on the complex post-government employment restrictions in a reader-friendly format. Agency ethics officials can provide this advisory directly to departing officials or use it as the basis for individual ethics counseling sessions.

In addition to these legal advisories, OGE issued timely and important program advisories. For example, OGE issued an advisory announcing the release of a one-page guidance document on Certificates of Divestiture. Although the document was designed for officials who may request Certificates of Divestiture, OGE expects that it will also assist ethics officials by reducing recurring questions and, thereby, increasing efficiency. In addition, OGE issued an advisory on procedures for the 2016 filing cycle for annual financial disclosure reports, as well as an advisory providing procedural guidance to Presidential candidates concerning their financial disclosure obligations.

#### OGE Legal Advisory Highlight

Introduction to the Primary Post-Government Employment Restrictions Applicable to Former Executive Branch Employees

Figure 4: Highlight of OGE's Key Legal Advisory

In fiscal year 2016, OGE also issued a comprehensive guide on the confidential financial disclosure form (OGE Form 450). This guide is designed to assist ethics officials across the executive branch in advising the approximately 380,000 federal employees who file confidential financial disclosures on an annual basis. More specifically, the guide included a brief overview of the confidential financial disclosure system, the reporting requirements for each part of the OGE Form 450, guidance for conducting reviews, and guidance for how to review a number of commonly reported interests and affiliations.

In developing these advisories, OGE continued to draw upon the expertise of agency ethics officials by consulting with key members of the ethics community. OGE solicited their views, convened focus groups, and obtained their feedback on draft advisories. With this community input, OGE increased its ability to effectively mitigate risks, reduce inconsistencies in the application of ethics laws, and address current issues confronting executive branch ethics officials. Anecdotal feedback from agency ethics officials reflects that OGE's approach of involving them in the development of advisories over the past few years has increased their satisfaction with both the process used and the advisories produced.

**Performance Goal:** In fiscal year 2016, an OGE survey of the ethics community revealed that 91 percent of respondents felt that advisories helped them perform their job duties.

#### *Engaged ethics officials to share information and shape policy*

In addition to integrating the feedback of ethics officials on its advisories, OGE continued its broader efforts to engage more directly with members of the government ethics community and to timely disseminate information to them in order to address existing and emerging ethics issues. To support this effort, OGE used the MAX.gov platform, a government-wide collaboration, data collection, and information-sharing site, to provide agency ethics officials with advanced notice of upcoming OGE guidance and events, as well as updates on relevant ethics-related legislative proposals. In addition, OGE used an email listserv and its website to provide timely and relevant information to the ethics community.

In fiscal year 2016, OGE also organized numerous meetings, conference calls, focus groups, and webinars to inform and collaborate with senior executive branch ethics officials on

OGE's initiatives. For example, OGE's Director continued the practice of holding live quarterly meetings for senior agency ethics officials, followed by telephone sessions to recap subjects covered during the meetings for those who could not attend in person. At these meetings, which were frequently attended by over 75 ethics officials, OGE's senior leaders shared information critical to managing an effective ethics program, encouraged discussion of current ethics issues facing the executive branch, and consulted with agency ethics officials regarding contemplated changes in OGE's policies and regulations. In response to OGE's annual survey of ethics officials, 100 percent of respondents indicated that they felt more informed as a result of attending these quarterly meetings.

**Performance Goal:** OGE found that 97 percent of respondents to the annual survey of ethics officials believe OGE timely communicates ethics-related information.

#### *Assisted other key stakeholders*

In addition to assisting executive branch ethics officials, OGE responded to requests for assistance from other key stakeholders, including Congress. OGE serves as the legislative liaison on behalf of the entire executive branch ethics program. OGE works to build congressional understanding of the executive branch ethics program and to inform congressional oversight and revisions to ethics laws. Notably, OGE responded to 20 congressional requests for detailed, technical assistance on executive branch ethics issues and draft legislation on topics including special government employees, outside activities, and financial disclosure. Additionally, OGE provided requested expertise and support to the Government Accountability Office on one of its substantive reviews. OGE also represented the executive branch ethics community by providing ethics expertise on 60 requests for comments on legislative materials and 44 requests for comments on Executive Orders and Presidential Memoranda from the Office of Management and Budget (OMB). OGE achieved a 99 percent success rate for timely responding to all of the requests it received.

For additional information on the numerous requests OGE receives from outside entities see page 47.

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will continue to provide quality Desk Officer services, timely legal and programmatic guidance, and effective assistance to key stakeholders. OGE will also continue to share information and to create opportunities to engage with the ethics community. Key highlights of OGE's planned work are described below.

#### *Assist and support agency ethics officials through OGE's Desk Officer Program*

OGE Desk Officers will continue to provide vital support to agency ethics officials so they can provide uniform and effective ethics guidance to the more than two million federal employees in the executive branch who serve the American people. Desk Officers will continue to provide timely, expert advice on applying ethics laws and regulations, and to disseminate the

most up-to-date ethics information. Desk Officers also will meet personally with agency ethics officials in order to strengthen their knowledge and professional relationships.

In fiscal years 2017 and 2018, OGE will develop and deploy an updated version of its agency information tracking system, AIMS. The updated application will allow for more customized reporting and will enable OGE to maximize the reach of its resources and become even more data driven in its decision making.

*Provide timely legal and program guidance*

OGE's primary focus during fiscal year 2017 will be reviewing a significant volume of nominee financial disclosure reports and negotiating ethics agreements to support the Presidential transition. To the extent that resources permit, OGE will also provide timely legal guidance to keep ethics officials up-to-date on current ethics issues and changes in ethics law and policy. OGE's support enables ethics officials to reduce risk and more effectively counsel their employees. In fiscal year 2017, OGE plans to issue advisories, as needed, to provide further interpretive guidance about the newly updated rules on seeking employment and gifts. OGE will also issue legal advisories summarizing relevant legislative activity during the 114<sup>th</sup> Congress, so that ethics officials will be able to stay abreast of Congressional mandates and ensure that their agencies' ethics programs remain compliant with legal requirements. OGE may also issue advisories if the incoming Presidential administration pursues new ethics initiatives.

In addition, through such means as written guidance, in-person meetings, social media, MAX.gov communications, or its official website, OGE will continue to provide direction on program management issues, such as ethics program administration and financial disclosure.

*Engage ethics officials and other external stakeholders to share information and shape policy*

OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date ethics information. OGE will continue using MAX.gov to provide agencies with advance notice of upcoming OGE guidance and events, as well as updates on relevant legislative proposals. OGE will continue to host its regularly scheduled quarterly meetings with senior agency ethics officials. OGE will also continue to post advisories and other guidance in a searchable format on its website, and will provide notice of new guidance via its listserv and MAX.gov.

OGE will continue to consult with agency ethics officials, non-governmental organizations, academic experts, and other stakeholders when developing new policy. Specifically, OGE will continue its practice of seeking input from the ethics community as part of the process of drafting legal advisories. Experience has shown that such outreach leads to the creation of more effective ethics guidance and fosters greater buy-in on the part of the ethics community.

OGE will also continue to provide advice and assistance in response to requests from a variety of stakeholders outside of the executive branch ethics community, such as Congress, professional associations, non-governmental organizations, academia, state and local

governments, and employee groups, to build a better understanding of the executive branch ethics program.

*Strategic Objective 1.2: Hold executive branch agencies accountable for carrying out an effective ethics program*

In performing its oversight function, OGE ensures that executive branch agencies are held accountable for carrying out effective ethics programs. Through its program review, data collection, and financial disclosure review activities, OGE evaluates the processes and systems in place at the agency level to ensure consistent and successful ethics program management.

Performance Highlights

*Reviewed agency ethics programs for compliance*

Through ethics program reviews — plenary, inspection, and follow-up reviews — OGE ensures consistent and sustainable ethics program compliance with established executive branch ethics laws, regulations and policies, and provides recommendations for meaningful program improvement. All three types of reviews are designed to identify and remediate systemic risks. They include an examination of ethics program materials such as financial disclosure reports, documentation of ethics advice provided to employees, training records, and ethics agreement compliance tracking.

*“I can honestly say that [the agency’s] Ethics Program is in a far better place than it was in 2013/January 2014 because of OGE.”*

~ Ethics official at the conclusion of an agency program review

Plenary reviews entail a comprehensive analysis of an agency’s implementation of all key requirements of an ethics program. Reviews also examine the procedures used to achieve compliance, with a focus on both outcomes and processes. Inspections are targeted examinations of key elements of an agency’s ethics program that focus on outcomes. Because inspections focus on select program elements, OGE is able to expand the reach of its resources to evaluate an increased number of agencies in a given year. If an inspection generates data suggesting potential systemic risks, OGE determines whether a more expansive plenary review or other appropriate action is necessary to identify and mitigate the causes of those systemic risks. The expanded capacity provided by the inspection process increases OGE’s onsite presence at federal agencies and, consequently, increases OGE’s capacity to detect systemic risks before problems arise.

## Program Review Reports (Plenary and Inspections) Published in Fiscal Year 2016

Commission of Fine Arts  
Commission to Eliminate Child Abuse and Neglect Fatalities  
Court Services and Offenders Supervision Agency for DC  
Defense Intelligence Agency  
Defense Logistics Agency  
Department of Defense (SOCO)  
Department of Defense Inspector General  
Department of Education  
Department of the Interior  
Department of the Treasury - Departmental Offices  
Department of Veterans Affairs  
Election Assistance Commission  
Equal Employment Opportunity Commission  
Equal Employment Opportunity Commission  
Federal Emergency Management Agency (DHS)  
Federal Maritime Commission  
General Services Administration  
James Madison Memorial Fellowship Foundation  
National Credit Union Administration  
National Labor Relations Board  
National Science Foundation  
Nuclear Regulatory Commission  
Office of Management and Budget  
Office of Personnel Management  
Office of the U.S. Trade Representative  
Overseas Private Investment Corporation  
U.S. Postal Service  
Uniformed Services University of Health Sciences

Follow-up reviews evaluate an agency's progress in implementing recommendations generated by an inspection or plenary review. Evaluating agency ethics programs and following up on agency implementation of review recommendations helps to hold agency leadership accountable for administering compliant ethics programs. In fiscal year 2016, OGE conducted 36 program reviews and published a total of 25 program review reports. OGE also conducted 32 follow-up reviews and published 26 follow-up review reports.

*Issued recommendations to improve compliance*

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation. A recommendation directs the agency to take actions necessary

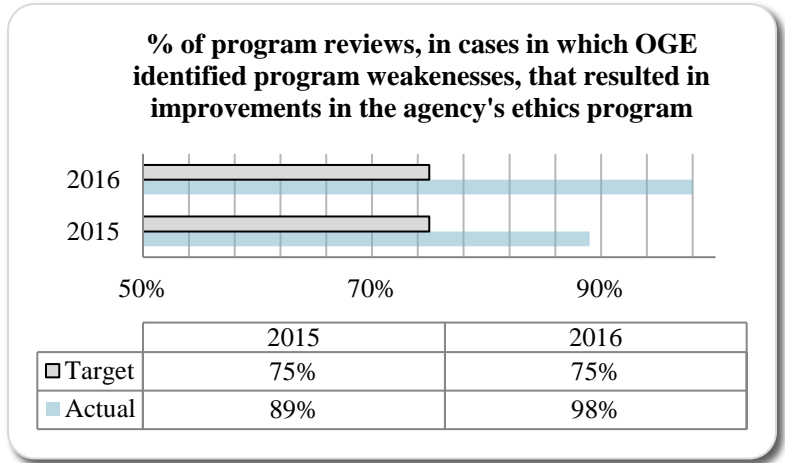
to correct the deficiency. In fiscal year 2016, OGE issued 129 recommendations through program reviews.

For example, OGE found during one review that only 77 percent of an agency's confidential financial disclosure report filers had received annual ethics training in the year covered by the review. Providing employees with annual training is essential because it enables them to identify potential conflicts of interest and take appropriate action to avoid violating statutes and regulations. In that case, OGE issued a recommendation that the agency ensure confidential filers complete required annual training. In response, the agency ethics officials took action to ensure annual ethics training was timely provided. In its follow-up review, OGE found that 93 percent of confidential filers completed annual ethics training, an increase of 16 percent, as a result of OGE's program review.

**Performance Goal:**

In cases in which OGE identified a program weakness during a program review, OGE exceeded its target for the percent of program reviews that resulted in improvements in the agency’s ethics program.

*Improved programs by sharing model practices*



**Figure 5: Program Review Recommendations**

In addition to identifying ethics program deficiencies or vulnerabilities, program reviews also provide the opportunity for OGE to identify model practices instituted by agencies to manage their ethics programs. OGE routinely shares these model practices with other agencies in connection with the program review process to enhance their programs. For example, to raise the visibility of the ethics program to senior leadership, OGE encouraged one agency to adopt another agency’s model practice of having the Designated Agency Ethics Official (DAEO) open all of the Secretary’s senior staff meetings with a five-minute briefing on a government ethics topic.

*Collected and analyzed program data from executive branch agencies*

OGE annually collects ethics program data from each of the more than 130 executive branch agencies. Agency responses to OGE’s information requests give OGE a snapshot view of each agency’s ethics program. Further, the compiled data provides OGE with an annual overview of the entire executive branch ethics program. In fiscal year 2016, OGE administered its Annual Agency Ethics Program Questionnaire (Annual Questionnaire) using an electronic application developed by OGE specifically for collecting the Annual Questionnaire data. This application has improved OGE’s ability to analyze data and has made the data collection process more efficient. One hundred percent of agencies complied with the requirement to submit their data. OGE also surveyed all executive branch agencies in fiscal year 2016 regarding their administration of the President’s Executive Order on Ethics Commitments by Executive Branch Personnel (Executive Order 13490), and was able to confirm 100 percent compliance executive branch-wide.

In fiscal year 2016, OGE continued to share key highlights from its Annual Questionnaire with ethics officials and the public. Having access to this data allowed ethics officials to compare aspects of their programs with those of other agencies, including how best to allocate ethics program resources. OGE also issued its seventh annual report on agencies’ administration of Executive Order 13490. OGE reported that during calendar year 2016, agencies successfully administered the Ethics Pledge and that all Presidentially appointed, Senate-confirmed (PAS) officials who were required to sign the Ethics Pledge in 2016 had done so. OGE made both the Annual Questionnaire data and the Ethics Pledge report available to the public on its official

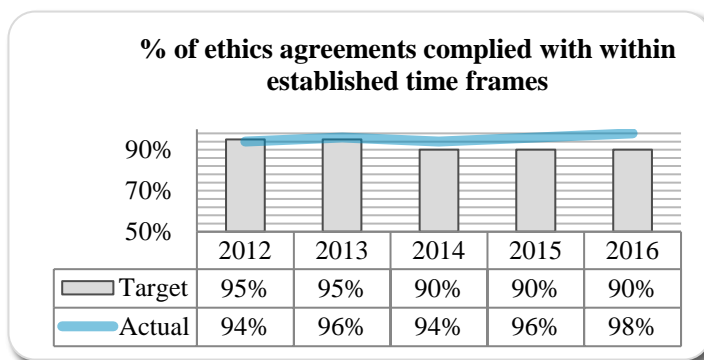


website. This program data helps the public gain a better understanding of the scope and impact of the executive branch ethics program.

*Monitored agency leaders' compliance with their ethics agreements*

OGE works to ensure that executive branch leaders, who are PAS officials, remain free from conflicts of interest after taking office. OGE identifies and resolves potential conflicts of interest on the part of PAS nominees by establishing written ethics agreements with them prior to confirmation. OGE then monitors PAS ethics agreement compliance through the collection and review of documentation provided by agency ethics officials.

**Performance Goal:** In fiscal year 2016, 47 PAS appointees were required to document their timely compliance with their ethics agreements. Agency ethics officials reported that 98 percent of these appointees complied with their ethics agreements within the required time frame.

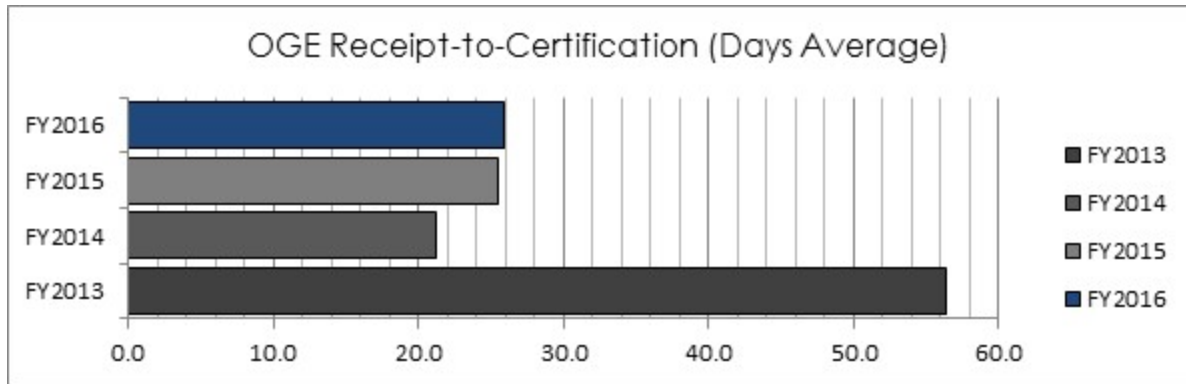


**Figure 6: Ethics Agreement Compliance**

*Reviewed the public financial disclosure reports of top officials*

OGE also reviews the annual, termination, and periodic transaction financial disclosure reports of PAS officials, as well as new entrant and other public financial disclosure reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. Timely review of these senior officials' reports helps ensure that they remain free from conflicts of interest. In fiscal year 2016, OGE reviewed 1,695 public financial disclosure reports (new entrant, annual, termination, and periodic transaction reports). In fiscal year 2016, the average number of days between the receipt of a report and OGE closing the report (certified or filed uncertified) was 26 days, consistent with fiscal years 2015 and 2014 (26 days and 21 days, respectively) and 30 days less than fiscal year 2013 (56 days), and 127 days less than fiscal year 2012 (153 days).<sup>2</sup>

<sup>2</sup> The numbers reported vary slightly from previously reported numbers due to a change in which reports are included in the calculation. Because reports may be received in one fiscal year but closed in another, the new calculation reflects on the total number of reports closed during the fiscal year, regardless of when the report was received, rather than reflecting only those reports both received and subsequently closed during the fiscal year.



**Figure 7: Financial Disclosure**

*Deployed a redesigned Financial Disclosure Tracking System (FDTS)*

In fiscal year 2016, OGE deployed a redesign of its Financial Disclosure Tracking System (FDTS), a critical tool in management of one of its core mission functions. This redesigned application integrated previously scanned financial disclosure forms and imported data from the previous tracking system. This allows OGE staff to access financial disclosure records, reports, supporting documentation, and correspondence relevant to a filer through a single application. The redesigned application includes new reporting features that improved OGE’s processes for monitoring receipt, review, and retention of required public financial disclosure reports and related documents. Other system enhancements were the inclusion of automated reminders to reviewers and enhanced data analysis capabilities. The process for public financial disclosure reports is now fully paperless, with OGE staff reviewing only electronic copies of reports. The migration from a paper process to a wholly electronic process has increased the efficiency of OGE’s financial disclosure review function.

**Performance Goal:** In fiscal year 2016, OGE completed 95% of its reviews of public financial disclosure reports, including new entrant, annual, termination, and periodic transaction reports required to be submitted to OGE within 60 days of receipt.

*Responded to agencies requests to tailor their financial disclosure programs*

OGE supports agencies’ efforts to tailor their financial disclosure programs to hold employees accountable for compliance with ethics rules and to deploy agencies’ resources where they will be most effective. OGE has authority to grant an agency’s request to extend the coverage of public financial disclosure requirements to any position upon a finding that the position is of “equal classification” to positions whose incumbents are required to file public financial disclosure reports. OGE also has authority to grant an agency’s request to exclude a position from the coverage of public financial disclosure requirements upon a finding that the position is of a confidential nature and has no policy-making role. In fiscal year 2016, OGE evaluated equal classification requests from four agencies for 13 positions and evaluated 12 requests for exclusions from coverage of public financial disclosure requirements.

*Supported the enforcement communities through advice, training, and collaboration*

OGE provides advice and training to the various enforcement communities, including the Department of Justice's (DOJ) criminal and civil divisions, Inspectors General, and employee relations professionals. OGE routinely assists Inspectors General and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations.



In fiscal year 2016, OGE's Director continued to serve as a standing member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), participating in CIGIE's meetings and attending its annual conference. OGE's Director also supported CIGIE's Integrity Committee. OGE's Director worked with CIGIE's leadership to revise OGE Form 202, which is used to notify OGE of referrals to the Department of Justice of potential violations of conflicts of interest laws. He also worked directly with CIGIE's leadership to refine provisions of OGE's proposed overhaul of 5 C.F.R. part 2638 directly applicable to Inspectors General. Also during fiscal year 2016, OGE staff provided direct support to approximately 15 investigators from Inspectors General offices and federal prosecutors who requested assistance with the interpretation and application of federal conflict of interest laws and ethics regulations in connection with live enforcement matters.

OGE provided an array of training to Inspectors General. For example, OGE instructors provided well-received training to 92 attendees at the Inspector General Criminal Investigation Academy, focusing on investigating ethics-related matters and working with ethics officials. This particular training is an integral part of the Academy's curriculum and complements a web-based training module OGE developed for Inspector General investigators. OGE also presented a distance-learning event for more than 300 staff members of offices of Inspectors General and agency ethics officials, which focused on the two main ways OGE and the ethics community can support criminal conflict of interest investigations. Lastly, at OGE's invitation, members of the Inspector General and federal employee relations community participated in-person and virtually at OGE's 2016 National Government Ethics Summit. (See page 22 for additional information about the Summit.)

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will continue to conduct reviews of agency ethics programs, collect data about each agency's program and the overall executive branch ethics program, monitor agency leaders' compliance with their ethics agreements, review senior officials' financial disclosure reports, and support the ethics enforcement communities. Key highlights of OGE's planned work are described below.

##### *Conduct program reviews*

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch, OGE anticipates that it will achieve its goal of having completed a program review of every agency in the executive branch

between January 2014 and January 2018. OGE plans to conduct appropriate follow-up reviews to assess agencies' progress in implementing any recommendations made by OGE in its program review reports.

In fiscal years 2017 and 2018, OGE will work toward achieving this goal by conducting program reviews comprising a combination of plenary reviews and inspections. Generally, OGE will conduct plenary reviews at the remaining Cabinet-level departments and at the largest executive branch agencies, while inspections will largely be limited to smaller agencies. However, as noted on page 14, the inspections process also serves as a risk management tool. If an inspection identifies systemic risks associated with an agency's ethics program, OGE will determine whether it is necessary to conduct a subsequent plenary review to assess and mitigate those risks.

In fiscal years 2017 and 2018, OGE will also continue to use the program review process to identify model practices and will share these practices with the executive branch ethics community during program reviews, through the Desk Officer Program, and at the next National Government Ethics Summit. (For more information on the Summit, see page 28.) By sharing innovative strategies already in place at certain agencies, OGE can leverage the access afforded by the program review process to improve the executive branch program as a whole.

*Collect, analyze, and publish program data from executive branch agencies*

In fiscal years 2017 and 2018, OGE will continue collecting, analyzing, and publishing data about the executive branch ethics program. OGE will use information collected through responses to the to evaluate the executive branch ethics program. OGE will continue to share key highlights and the full raw data set with the ethics community and the public on its official website.

*Monitor compliance with commitments made by incoming agency leaders to resolve conflicts of interest*

OGE will continue working to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office. In fiscal years 2017 and 2018, OGE anticipates a significant volume of ethics agreements resulting from the influx of new senior leaders due to the Presidential transition in 2017. OGE will continue to monitor the timely compliance by PAS officials with their commitments to resolve conflicts of interest as reflected in their ethics agreements.

OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure they are timely filed, accurately completed, and thoroughly reviewed by agency ethics officials for potential conflicts of interest.

*Support the vital work of the ethics enforcement communities*

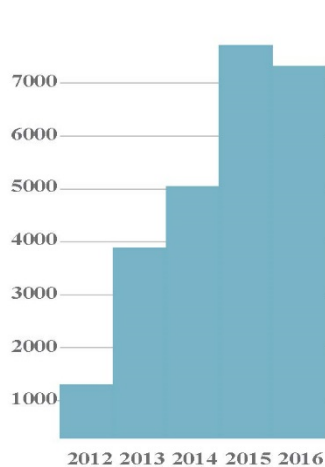
To support the work of the enforcement communities responsible for holding agency employees accountable for abiding by the ethics laws, OGE will continue to provide them with

interpretive guidance. OGE will also continue to train and collaborate with members of the enforcement community. OGE will invite members from these communities to participate in the next National Government Ethics Summit (see page 28 for additional information), and will provide training as part of the Inspector General Criminal Investigator Academy’s Public Corruption Investigations Training Program. Further, OGE’s Director will continue to participate actively in the work of the Council of Inspectors General on Integrity and Efficiency (CIGIE). OGE will also build on its recent collaboration with CIGIE regarding the revision of OGE Form 202 by working with CIGIE to enhance its processes for tracking and following up on conflicts of interest referrals to the Department of Justice. OGE will appoint a member of its Compliance Division staff to serve as the coordinator of this enhanced effort to ensure that agencies are considering disciplinary or other corrective action in the event of declinations of prosecution.

*Strategic Objective 1.3: Contribute to the professional development of ethics officials*

OGE continues to prioritize work on its strategic objective of contributing to the professional development of ethics officials. This objective is all the more important because of the significant number of ethics officials eligible for retirement. OGE is committed to educating executive branch ethics officials and federal employees on the conflicts of interest laws and ethics regulations. OGE’s team of professional staff and attorneys promote continuous learning, increasing the overall skills of the executive branch’s corps of professional agency ethics officials. In turn, OGE provides these agency ethics officials knowledge and skills to train the broader federal workforce regarding their ethical responsibilities.

Performance Highlights



**Figure 8: Registration for OGE Training**

One key to the continuing success of the decentralized executive branch ethics program that OGE leads is a highly trained community of ethics officials. In fiscal year 2016, OGE provided an array of educational opportunities to ensure that ethics officials had access to the expertise and tools needed to do their jobs. Through an ever increasingly efficient use of technology and existing resources, OGE has been able to provide most of these opportunities to agencies free of charge. OGE has also increased registrations for its educational opportunities from about 1,200 registrations in fiscal year 2012 to more than 7,200 in fiscal year 2016, an increase of more than 500 percent. See Figure 8. Not only is the quantity of OGE training noteworthy, so is the quality. As discussed below, the overwhelming majority of registrants for OGE’s educational offerings rated their quality very highly. See performance goal results on page 23.

## *Held the 2016 National Government Ethics Summit*



In March 2016, OGE held the second National Government Ethics Summit, an inexpensive, multi-day training event attended by over 500 in-person executive branch ethics officials and external stakeholders. OGE convened this event locally in Washington, D.C. As with OGE's first National

Government Ethics Summit in September 2014, OGE again used federal facilities to keep down costs. The registration fee was \$40 per person with an overall event cost of only about \$17,000, and OGE charged no fee at all for viewing the live-streamed feed of sessions online.

### **Who Attended the Summit?**

- Ethics officials from executive branch agencies
- Ethics officials from the two other branches of the federal government
- Ethics officials from state and local governments
- Staff from various offices of Inspectors General
- Members of the press
- Representatives from international organizations and governments
- Members of the public who viewed the live-streamed sessions

### **Who Spoke at the Summit?**

- OGE employees
- Executive branch ethics officials
- Former members of Presidential transition teams from two different administrations
- Former White House attorneys from three Presidential administrations
- Enforcement officials from the Department of Justice and offices of Inspectors General
- An ombudsman
- Academics
- Representatives from non-profits and good government groups
- General Services Administration officials
- National Archives and Records Administration attorneys
- Office of Special Counsel staff

The theme of the 2016 Summit was “The Presidential Transition” because the executive branch ethics program will play a critical role in supporting our nation’s peaceful transition of power. By providing ethics officials with training and useful resources, OGE works to ensure that they have the capacity to deliver a smooth Presidential transition. As part of this effort, the 2016 Summit provided members of the government ethics community with opportunities to deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections with fellow ethics officials who can lend a hand in resolving complex ethics issues.

The Summit consisted of three days of live instruction with a total of 54 in-person sessions. The Summit brought together significant expertise on a wide variety of topics including several high-level panel presentations on the topic of Presidential transition. These presentations

exposed participants to the insights of speakers, from both inside and outside the government. Panelists discussed a variety of issues related to preparing ethics officials for issues that arise during and after an election year. Seasoned ethics officials also shared lessons learned, model

practices, and promising new strategies that participants could adopt for their own ethics programs.

To both expand the reach of the Summit and increase transparency of the executive branch ethics program, OGE effectively utilized technology to broadcast, by live-streaming video, 25 of the sessions. This expanded the reach of the Summit, affording additional stakeholders and interested members of the public significant access to the various program. OGE also posted recordings of these events on its YouTube and Google+ pages, so that they would remain available for future viewing. Members of the public and media can view these materials online free of charge. Web analytics indicate that this material has received 2,500 unique views.

*Held a full-day, executive branch-wide symposium on financial disclosure*

OGE periodically offers symposia, which are events that allow large groups of ethics officials to receive training and collaborate with other ethics professionals. Symposia bolster the networks between OGE and executive branch ethics officials that support the ethics program, as well as increase the knowledge and skills of ethics professionals across the executive branch.

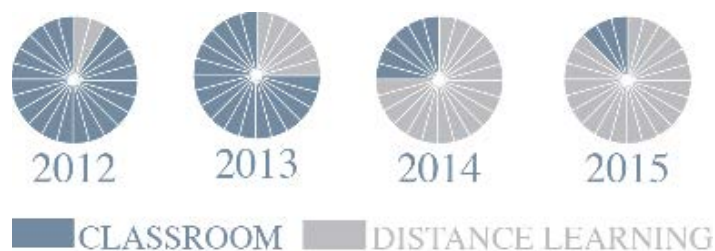
**87%** of respondents said they were better equipped to do their job because of the Summit.

**87%** of respondents said that, as a result of attending the Summit, they believe they can more effectively do their job.

**89%** of respondents said that, as a result of attending the Summit, they better understand the subject.

In fiscal year 2016, OGE held a symposium on financial disclosure at the Federal Housing Finance Agency in Washington, D.C. The symposium was a full-day, in-person training event, with two financial disclosure tracks: one for beginner financial disclosure reviewers and one for nominee financial disclosure reviewers. The beginner financial disclosure track prepared 140 ethics officials to review the OGE Form 278e, while the nominee financial disclosure track prepared 109 ethics officials to review the more complex nominee financial disclosure reports. The symposium focused on ensuring that agency participants were better prepared to manage successfully the surge in financial disclosure filings related to the large numbers of departing employees and incoming nominees typically reviewed during a transition year.

*Conducted frequent online distance-learning events and in-person training*



**Figure 9: Change in Approach to Providing Training to Agency Ethics Officials**

In fiscal year 2016, OGE continued to seek innovative strategies for delivery of training to the ethics community. For example, OGE uses a Google+ page to broadcast distance-learning events free of charge to anyone with an internet connection. In addition, training delivered through Google+ increases transparency by permitting public access to the professional development training that

OGE offers to ethics officials throughout U.S. and around the world.

In fiscal year 2016, OGE continued to deliver its Ethics Fundamentals and Advanced Practitioner distance-learning series. These series are designed to address the needs of both new and experienced ethics officials in the executive branch ethics community. These monthly events allow OGE to reach ethics officials throughout the government with timely policy guidance, basic training, advanced training, model practices, and ethics news and information. A typical event reaches more than 250 officials during the live broadcast and is available on-demand for viewing after the event. In 2016, OGE offered 6 Advanced Practitioner events and 6 Fundamentals events. In total, 3,849 ethics officials registered for these events, and 94 percent of respondents to a course evaluation reported that participating in these events made them better able to do their jobs. Topics covered included gifts, public and confidential financial disclosure, ethics records, and the tools for delivering annual ethics training, as well as a Presidential Transition Readiness series of courses and workshops.



In addition to the distance-learning series, OGE developed and delivered two Massive Open Online Courses (MOOC) on public financial disclosure and seeking and negotiating for employment. MOOCs enable large numbers of ethics officials to experience content OGE typically delivers through half-day live-

training workshops. These multi-session presentations bring the feel of in-person classroom training to the online classroom by incorporating lectures, practical exercises, and self-assessments. Over 472 officials participated in the two MOOCs presented in fiscal year 2016, with 90 percent of respondents to a course evaluation reporting that attendance made them better able to do their jobs.

OGE and ethics officials play important roles in ensuring a smooth transition of power from one administration to the next. To support them in these roles, OGE built on the success of the National Government Ethics Summit in preparing ethics officials for the Presidential transition by launching a series of “Transition Readiness” learning events. This series included both distance learning and classroom learning opportunities to prepare ethics officials for the Presidential transition. In fiscal year 2016, OGE held 5 Transition Readiness distance-learning



events, which garnered 779 registrations. These events addressed review of public financial disclosure reports, counseling outgoing employees on issues related to seeking and negotiating for employment outside of government, educating new agency leadership on their roles in supporting a strong ethical culture, and implementing strategies for ethics officials to manage the increased workload in the post-election period.

As part of its Transition Readiness series, OGE also conducted a series of workshops to help agency ethics officials prepare their programs for Presidential transition. These workshops helped participants prepare for increased financial disclosure and counseling loads, to brief new leadership on the state of the ethics program, and to contribute to risk management activities at their agencies.

OGE also created and distributed a series of training tools for career Senior Executive Service (SES) leaders who will assume acting roles during the Presidential transition. These tools help SES leaders navigate the ethical implications of acting in a new role and interacting with former colleagues who have left government service.

OGE also surveyed agency ethics officials regarding their training needs to prepare for the Presidential transition and the challenges of training new political appointees on applicable ethics requirements. OGE used the Max.gov platform to share the responses with the community of ethics officials and solicit further comments regarding their training needs. OGE then applied what it learned from agency ethics officials to plan its training offerings for fiscal year 2017.

The combined effect of the 2016 National Government Ethics Summit, the Transition Readiness series, and the interactive collaboration with agency ethics officials to assess training needs is helping the executive branch ethics community build the expertise necessary to support a smooth and effective Presidential transition.

**Performance Goal:** In fiscal year 2016, OGE increased and further refined its educational offerings, and those offerings continued to be well received by ethics officials. As a result of participating in courses offered by OGE, 100 percent of participants reported that they better understood the subject matter presented and 97 percent reported that they believed they could more effectively perform their job functions.

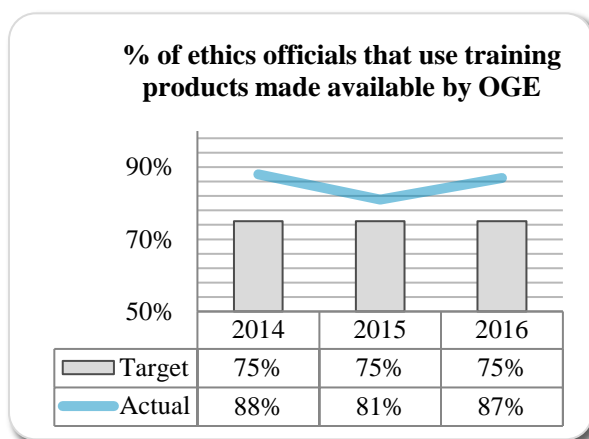


Figure 10: Ethics Training Products

*Developed and made available useful training products*

Through its Institute for Ethics in Government (IEG), OGE continued to support agency ethics officials in the delivery of high quality annual ethics training in fiscal year 2016. Notably, OGE relied on input from experienced ethics officials to develop a collection of ethics scenarios for use in annual training, and produced a virtual broadcast

introducing the scenarios and demonstrating their use. After the initial broadcast, OGE continued to help ethics officials use these scenarios by holding a live demonstration of teaching techniques at the 2016 National Government Ethics Summit and conducting a second broadcast dedicated to handling difficult situations that may arise during course delivery. OGE also held a series of instructor development workshops, which brought together ethics officials from across the government to learn from one another and to practice using the OGE-developed training model.

OGE makes these and other materials available to agency ethics officials at no cost through its online IEG “store”, using the MAX.gov platform. Offerings include practical job aids and reference guides, among other products, to assist agency ethics officials in the day-to-day operations of their programs. The IEG store is also a place where members of the ethics community can share similar products that they have created, including materials to assist with annual employee ethics training. The IEG store is an efficient way for agency ethics officials to obtain the educational materials that are most pertinent to their particular needs. In addition to the products available in the IEG Store, OGE makes available all of the video and audio recordings of its distance-learning events, as well as the informational slide decks, job aids, and reference materials created to support those events. OGE frequently encourages ethics officials to use these on-demand courses and materials to train their own staffs and agency employees.

**Performance Goal:** Eighty-seven percent of ethics officials used a training product made available by OGE.

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will continue to focus on providing high quality, cost-effective training opportunities to ensure that ethics officials have the expertise and tools they need to do their jobs. Key highlights of OGE’s planned work are described below.

##### *Conduct online distance-learning events and targeted in-person training*

In fiscal years 2017 and 2018, OGE will continue to deliver training events that provide ethics officials throughout government with needed training, exposure to model practices, timely policy guidance, and ethics news and information. The volume of OGE’s educational offerings may decrease in fiscal year 2017 because OGE will need to focus its resources primarily on reviewing nominee financial disclosure reports and drafting ethics agreements in support of the Presidential transition. However, OGE will continue offering some training in fiscal year 2017 and expects that the volume of offerings will return to a normal level in fiscal year 2018.

Throughout both fiscal years 2017 and 2018, OGE will endeavor to continue delivering the Ethics Fundamentals and the Advanced Practitioner distance-learning series with as much frequency as practicable during the heaviest periods of the transition. Particularly in fiscal year 2017, this series will focus on ethics issues that arise after an election. For example, OGE will offer sessions that focus on ethics issues related to financial disclosure, discuss how to prepare and deliver briefings for new leaders, and address the ethics rules that apply to departing senior government leaders. OGE will offer both distance learning and live-training sessions to educate the community on any regulatory changes that may take effect in fiscal year 2017. In fiscal year

2018, topics will likely shift to a broader focus on the full range of ethics issues that arise throughout the cycle of a Presidential administration.

To the extent practicable in fiscal year 2017 and throughout fiscal year 2018, OGE will also offer distance-learning workshops and will continue to deliver training through its MOOC program. OGE will broadcast these events free of charge through its Google+ and YouTube accounts, allowing OGE to reach larger audiences. OGE will continue to tap the experience and knowledge of the ethics community by inviting ethics officials to regularly present as part of these distance-learning events.

#### *Develop and disseminate training products*

OGE will continue to develop ethics education products and disseminate products developed both by OGE and by agency ethics programs. In particular, OGE's staff will continue to create original products, including materials that agencies can customize to satisfy regulatory requirements for their new employee ethics training and annual ethics training, such as written documents and training scenarios that ethics officials can deliver in a variety of formats. More specifically, to ensure OGE's training products remain up-to-date, OGE will also review old training products to update and modernize them with relevant content.

In fiscal year 2017, OGE will distribute multiple written products that executive branch ethics programs can use in fulfilling the initial ethics training requirements. These products include a handbook for executive branch employees new to federal service, which outlines the ethical obligations of public service and highlights both the employee's as well as each executive branch agency's commitment to ethical conduct and an ethical culture. In addition, OGE is producing summaries of both the Standards of Ethical Conduct for Employees of the Executive Branch and the Criminal Conflict of Interest Statutes, which include illustrative examples of each of the regulatory and legal provisions. OGE will distribute these materials in fiscal year 2017 and, will train ethics officials on techniques for using them in fiscal year 2017.

OGE is also in the process of developing training modules and an instructor guide for initial ethics training that complement and supplement the handbook and summaries. OGE will roll out these materials to agency ethics officials in fiscal year 2017.

#### *Hold a regional symposium and the National Government Ethics Summit*

OGE plans to hold a regional symposium in either fiscal year 2017 or fiscal year 2018 specifically to address the critical professional development needs of regional ethics officials. The timing will depend on the availability of resources for OGE's education efforts during the Presidential transition. Based on 2015 data from the Annual Questionnaire, approximately 68 percent of all ethics officials (who spend more than two hours per week performing ethics duties) are located outside the Washington, D.C. metropolitan area. Although supported by OGE's shift to virtual training formats, their access to in-person training that OGE provides is limited by their distance from the Washington, D.C. area. By engaging with some of them in person, OGE will be able to increase the uniformity of the ethics community by providing them with increased opportunities to pose questions to OGE officials during live-training sessions. OGE will use the data it collected through its training needs assessment in fiscal year 2016 to select the topics of

greatest relevance to these regional officials. OGE will also analyze data from its Agency Information Management System (AIMS), including the number and nature of questions received from agency ethics officials, when selecting the training topics.

In either fiscal year 2018 or 2019, OGE will hold its third National Government Ethics Summit (Summit). OGE designed the Summit concept to strengthen the executive branch ethics program and provide attendees with opportunities to deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections with ethics officials who can assist in resolving even the most complex ethics issues. Coming at the end of a full transition, the Summit will bring together hundreds of executive branch ethics officials and external stakeholders, including officials from the other branches of the federal government, Inspectors General staff, members of the press, and advocates from good government groups at a time when OGE will be introducing its new strategic plan. OGE anticipates that the Summit will be a time for government ethics practitioners and other stakeholders to meet and collaborate.

#### *Strategic Objective 1.4: Modernize and implement the ethics regulations*

Ethics regulations serve as the building blocks of the executive branch ethics program. OGE reviews and revises the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21<sup>st</sup> century government. In fiscal year 2016, OGE undertook a relatively high volume of regulatory work to update its executive branch-wide ethics regulations and agency-specific supplemental ethics regulations.

#### Performance Highlights

##### *Changes to the Standards of Ethical Conduct for Employees of the Executive Branch*

The Standards of Ethical Conduct for Employees of the Executive Branch (Standards of Conduct) sets the expectations of conduct for every executive branch employee. OGE targeted for revision two areas of significant interest to ethics officials and employees: gifts and seeking employment (5 C.F.R. part 2635, subparts B and F). OGE focused on the gift regulations first because ethics officials consult OGE with more questions about gifts than any other subject covered by the Standards of Conduct. Next, OGE focused on the regulations governing employee's efforts to seek employment outside the government primarily because the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act), as amended, established new reporting and recusal requirements. OGE previously implemented the STOCK Act through advisories. The next step was for OGE to conform its regulations to the Act. OGE also used this regulatory action as an opportunity to propose a number of other clarifying amendments to the seeking employment regulations and to modernize the regulations by addressing the use of social media for job searches.

As part of its revision process, OGE solicited significant input from over 100 ethics officials representing many agencies through a variety of mechanisms, including a survey, sessions at OGE's 2014 Summit, and several focus groups in fiscal years 2014 and 2015. This outreach helped OGE to take advantage of the expertise and experience of officials charged with

providing employees advice on these rules every day. OGE used their feedback to inform its approach to revising the Standards of Conduct, and incorporated numerous suggestions that they and others provided. OGE then drafted proposed regulations and consulted both the Department of Justice and the Office of Personnel Management, as required by the Ethics in Government Act of 1978, as amended. After offering them a reasonable opportunity to share their views, OGE submitted the draft regulations through both the informal and formal review processes administrated by the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget. Through those processes, OGE made further revisions to the draft regulations based on input from executive branch agencies.

- Status of the Proposed Changes Regarding Gifts From Outside Sources (5 C.F.R. Part 2635, subpart B)

In November 2015, OGE published a proposed regulation in the *Federal Register* comprehensively revising its regulations addressing the limitations on the ability of executive branch employees from receiving gifts from sources outside the government. After the close of the notice and comment period, OGE actively considered the valuable comments it received from the public and revised the proposed regulation. OGE then submitted a draft final rule through OIRA's informal and formal processes, which included another 90-day opportunity for executive branch agencies to comment. OGE is working with agencies to address their additional comments and anticipates publishing a final rule in fiscal year 2017. These regulatory changes seek to increase the public's confidence in government decision-making by establishing a principled approach to making determinations on gifts offered to federal employees.

- Status of the Proposed Changes Regarding Seeking Other Employment (5 C.F.R. Part 2635, subpart F)

In February 2016, OGE published a proposed regulation in the *Federal Register* revising the regulations addressing the limitations on the ability of executive branch employees to seek employment other than government employment. OGE received no public comments to the proposed regulation. OGE then submitted a draft final rule through OIRA's informal and formal processes, which included another 90-day opportunity for executive branch agencies to comment. OGE worked with agencies to address their additional comments before publishing a final rule in July 2016. OGE notified Congress of this issuance pursuant to the Congressional Review Act. These changes, among other things, ensure that executive branch employees have clear regulatory guidance on complying with the STOCK Act's requirements regarding their reporting and recusal obligations when seeking or negotiating for future employment or compensation. The modernized rule also provides employees with guidance regarding modern job search techniques that employ social media.

#### *Changes to the ethics regulation governing executive agency ethics program responsibilities*

In fiscal year 2016, OGE continued its work reviewing and revising its regulations covering executive agency ethics program responsibilities found at 5 C.F.R. part 2638.

Previously, in fiscal year 2015, OGE had convened a series of meetings with 45 agencies and 20 offices of Inspectors General, to solicit their input regarding ethics program requirements. Incorporating their extensive input, OGE developed a draft regulation that overhauled part 2638 to, among other changes, identify program roles and responsibilities, significantly clarify OGE's authorities with regard to agencies and individuals, strengthen ethics education requirements, more accurately describe the nature of OGE's issuances, institutionalize OGE's increased collaboration with agency ethics officials, and mandate agency ethics office's cyclical preparations for Presidential transitions, among other changes. OGE then drafted proposed regulations and consulted both the Department of Justice and the Office of Personnel Management, as required by the Ethics in Government Act of 1978, as amended. After offering them a reasonable opportunity to share their views, OGE submitted the draft regulations through both the informal and formal review processes administered by OIRA in the Office of Management and Budget. Through those processes, OGE made further revisions to the draft regulations based on input from executive branch agencies.

In June 2016, OGE published in the *Federal Register* a proposed regulation completely revising part 2638. This regulation, which was first issued in 1981 and has remained unchanged for almost 35 years, sets forth the requirements for administering the executive branch ethics program. As such, the proposed regulation contains significant updates that more accurately reflect the status of the executive branch ethics program and clarify provisions that have historically caused confusion among external stakeholders regarding OGE's role in the program. OGE has received only one public comment. After carefully considering this comment, as well as input from CIGIE as part of OGE's ongoing collaboration with the Inspectors General community, OGE then submitted a draft final rule through OIRA's informal and formal processes, which included another 90-day opportunity for executive branch agencies to comment. OGE is working with agencies to address their additional comments and will publish a final rule in fiscal year 2017.

#### *Changes to the executive branch financial disclosure regulation*

In fiscal year 2016, OGE made significant progress toward finalizing key regulatory changes to the financial disclosure regulations found at 5 C.F.R. part 2634 (Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture) to implement the additional financial disclosure requirements that the STOCK Act established. OGE initially implemented the STOCK Act through advisories and now sought to conform the regulations to the Act. OGE also used this regulatory action as an opportunity to propose a number of other changes to improve the financial disclosure process. These revisions include modernizing language, streamlining additional and updated examples, and ensuring that the regulation aligns more closely with the Ethics in Government Act and OGE's other regulations. The proposed changes will clarify how the financial disclosure laws apply to filers and agency financial disclosure programs.

OGE's efforts to update part 2634 began in fiscal year 2015 when OGE conducted focus groups to solicit input from ethics officials representing dozens of agencies. This outreach helped OGE to leverage the expertise and experience of officials charged with providing employees advice on these rules every day. OGE used the feedback from officials to inform its approach to

revising the regulations, and incorporated numerous suggestions received. OGE then drafted proposed regulations and consulted both the Department of Justice and the Office of Personnel Management, as required by the Ethics in Government Act of 1978, as amended. After offering them a reasonable opportunity to share their views, OGE submitted the draft regulations through both the informal and formal review processes administered by OIRA. Through those processes, OGE made further revisions to the draft regulations based on input from executive branch agencies. OGE anticipates issuing proposed regulations in fiscal year 2018, subject to OIRA's clearance.

#### *Changes to agency-specific ethics regulations and separate component designations*

OGE consults with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs. In fiscal year 2016, OGE and the Department of Homeland Security jointly issued a new supplemental agency ethics regulation. The supplemental regulation set forth employee restrictions on the purchase of certain financial holdings, required employees to seek approval for certain outside employment and activities, and designated components within DHS as separate agencies for purposes of determining whether the donor of a gift is a prohibited source. Agency-specific supplemental ethics regulations calibrate ethics restrictions to the unique needs of employees of individual agencies.

OGE also updated the component designations (5 C.F.R. part 2641, Appendix B), based on agency recommendations for the purpose of applying the post-government employment ethics restrictions to former employees of specific components of executive branch employees. These separate component designations ensure that the post-employment rules are appropriately focused on ensuring that former federal employees do not make unfair use of their prior federal employment to influence government, without overreaching indiscriminately to extend the restriction to separate components over which they lacked influence while serving in the government.

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will continue to work on modernizing the ethics regulations to ensure their continued effectiveness and applicability. OGE will also continue to issue supplemental agency ethics regulations in consultation with individual executive branch agencies. Key highlights of OGE's planned work are described below.

#### *Publish final and proposed rules*

In fiscal year 2017, OGE plans to publish final rules amending 5 C.F.R. part 2635, subpart B and part 2638. In fiscal year 2018, OGE anticipates publishing proposed rules that would modernize the remaining subparts of the Standards of Conduct at 5 C.F.R. part 2635. OGE also plans to finalize the amendments to 5 C.F.R. part 2634 and conduct an in-depth review of 5 C.F.R. part 2640. OGE revised part 2640 in 2002, six years after its issuance, but has not made significant revisions in the fourteen years since then. In the meantime, experience has

taught lessons about the efficacy of the existing language and the nature of financial interests covered by the regulation have changed as investment vehicles have continued to evolve.

Upon issuance, OGE will develop training materials and website content to reflect and explain the regulatory changes. OGE will also provide external training to agency ethics officials and issue legal and program advisories on the application of the revisions. Internally, OGE will train its Desk Officers on the regulatory requirements to ensure that OGE provides timely and accurate advice in response to questions from agency ethics officials and other stakeholders. Given the extent of the regulatory revisions, this activity could require a significant commitment of OGE's resources, depending on the number of proposed regulatory revisions that become final during this period.



## Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch

OGE plays a vital role in the continuity of the most senior leadership in the executive branch by supporting the President's constitutional role in nominating and appointing executive branch officials. OGE is a key Presidential transition service provider agency tasked with working with agency ethics officials to identify and resolve any conflicts of interest leaders coming into government may have. OGE also operates *Integrity*, the electronic financial disclosure system these leaders will use to report their financial interests. This work is especially critical during a Presidential transition when, due to vacancies in the most senior leadership positions, the nation is particularly vulnerable to national security and other risks.

Agency leaders play a significant role, both in promoting an ethical culture and supporting an agency's ethics program. The nomination process provides a unique opportunity for OGE to introduce incoming agency leaders to the executive branch ethics program. In addition, OGE contributes to the continuity of senior leadership by supporting succession-planning efforts in executive branch agency ethics programs. Proper succession planning is the key to mitigating the loss of ethics expertise that stems from the significant turnover within the executive branch due to the retirement of experienced executive branch ethics officials.

### *Strategic Objective 2.1: Provide assistance to the President and the Senate in the nomination of top-level executive branch officials*

OGE provides an independent review of the financial disclosure reports of candidates for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed nominees and candidates for the Office of the President of the United States. OGE makes sure that the nominees and Presidential candidates have complied with the extensive requirements for financial disclosure under the Ethics in Government Act. These requirements are highly complex, and ensuring full compliance is labor-intensive. OGE's goal with regard to a nominee's disclosures is to ensure that the Senate receives a complete accounting of relevant financial interests in order to facilitate its advice-and-consent role in considering the President's nominees. The goal concerning a Presidential candidate is to provide the electorate with similar information.

OGE's review of nominees' disclosures presents a critical opportunity to evaluate their financial interests for potential conflicts of interest and introduces top leaders to the importance of ethical leadership. OGE's staff approaches this function from the perspective of managing risk. To that end, OGE requires nominees to reduce the potential for ethical issues to arise in the first place, and OGE prescribes mechanisms for addressing conflicts of interest if issues do arise. In evaluating the potential risks, OGE consults with agency ethics officials who are familiar with their agencies' programs and activities. Based on these consultations, OGE and agency ethics officials prepare an ethics agreement that describes the steps a nominee will take to avoid conflicts of interest. After confirming with the agency that there are no unresolved conflicts of interest, OGE transmits the review package directly to the Senate following a Presidential nomination.

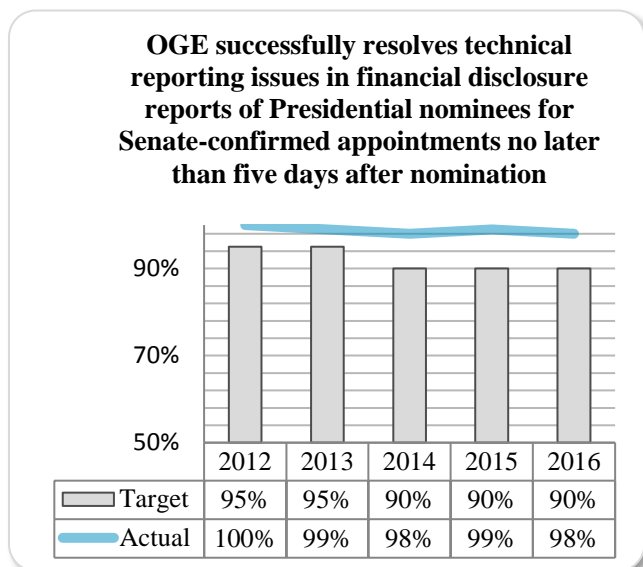
The nominee function is never more important than during a change of Presidential administrations. A Presidential transition is a critical time when the nation is vulnerable, with the potential for manmade, natural, or economic disasters to strike while the government’s top leadership positions are vacant. OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. During a Presidential transition, the nominations going through OGE typically triple in volume and increase in complexity.

To manage this challenge, OGE must prepare for the possibility of a transition every four years. Starting two years before a transition, OGE begins training additional staff members to review nominee packages. One year out from the inauguration, OGE steps up both its internal training and the training it provides to agency ethics officials. At that point, the training focuses both on reviewing nominees and on counseling outgoing officials on the legal restrictions applicable to them when they are seeking post-government employment and after they leave government. In the year after a Presidential election, OGE necessarily draws down on other program activities in order to commit additional resources to managing the volume of transition-related work. When a sitting President is reelected, the increased volume of work is challenging due to the turnover of appointees between the first and second terms. When a new President is elected, the challenge is even greater.

Performance Highlights

*Reviewed financial disclosure reports of the highest government leaders and covered Presidential candidates*

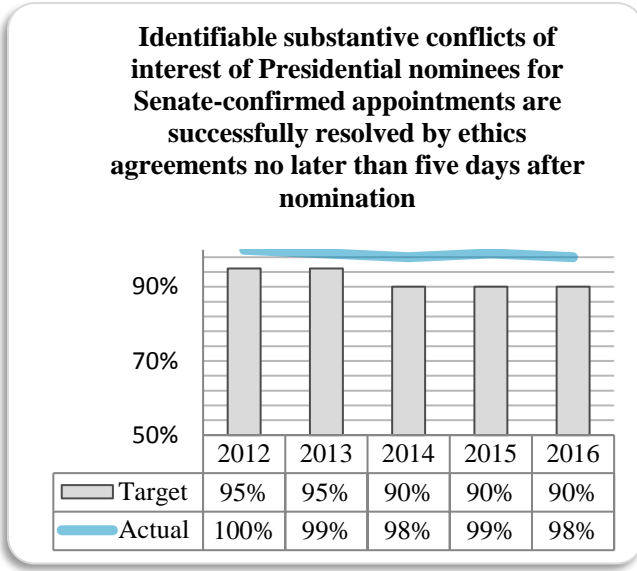
In fiscal year 2016, OGE reviewed the reports of nominees for approximately 12 percent of the PAS positions. By leveraging existing resources and improving internal processes and tracking, OGE was able to meet the priorities set by the White House and the Senate.



**Figure 11: PAS Nominee Financial Disclosure Reports**

In addition, in coordination with the Federal Election Commission, OGE reviewed all of the public financial disclosure reports of covered candidates for the Office of President of the United States, as well as the reports of candidates for the office of Vice President of the United States. OGE makes these reports available to the public upon request.

**Performance Goal:** OGE measures its performance by the successful and timely resolution of conflicts and technical reporting issues for nominee financial disclosure reports. OGE’s standard is to resolve conflicts and technical reporting



**Figure 12: PAS Nominee Ethics Agreements**

issues no later than five days after a nomination is made. OGE exceeded its targets in this area.

*Successfully launched nominee functionality and operated Integrity, OGE’s electronic executive branch-wide public financial disclosure filing system*

In fiscal year 2015, OGE launched Integrity, the secure, web-based electronic public financial disclosure system mandated by the STOCK Act. OGE successfully registered executive branch filers in Integrity in time for them to use it to file their financial disclosure reports for the fiscal year 2015 filing cycle. OGE decided to require all executive branch

agencies to use Integrity for filers serving in Presidentially appointed positions requiring Senate confirmation (PAS positions) and for filers serving as Designated Agency Ethics Officials. Throughout fiscal year 2016, OGE worked to transition 80 agencies and approximately 7,000 filers into Integrity in time for the 2016 annual filing season. As a result of OGE’s multi-year efforts 13,700 filers from 134 agencies were registered and ready to use the system during the 2016 annual 278 filing season. Between January 1, 2016, and August 31, approximately 17,000 reports were processed in Integrity – an approximately 300 percent increase in the number of public financial disclosure reports (278e and 278-T) processed in the system, as compared with the same time period in calendar year 2015.

Also in fiscal year 2016, OGE successfully developed and launched a complex new workflow functionality in *Integrity* for reviewing Presidential nominees that will enable OGE to manage the influx of the highest-level officials in the next Administration, so they can securely and efficiently file their public financial disclosure reports electronically. Beginning in December 2015, the White House began directing prospective PAS nominees to submit their financial disclosure reports through *Integrity*. The response from users of the nominee functionality in *Integrity* was overwhelmingly positive, demonstrating the system is ready for use during the change of Administration. In fiscal year 2016, *Integrity* successfully processed 59 new PAS nominees. Although many agencies did not have nominees for PAS positions, OGE launched an executive branch-wide initiative to ensure that ethics officials have established the proper system configurations and have received the necessary training to review the high volume of financial disclosure reports that nominees will file through *Integrity* during the Presidential transition.

As part of the increased government-wide focus on planning early for the Presidential transition, in late fiscal year 2016, OGE also coordinated with Presidential campaigns regarding OGE’s role in the nomination process and provided training to designated campaign staff on the use of *Integrity*. This work enabled both campaigns to become familiar and confident with the

system even before the election. These efforts also will enable the President-elect's transition team to start processing PAS nominees through the system immediately after the election.

OGE has needed to commit considerable resources to successfully operate *Integrity*, refine and enhance its functionality, and ensure its security. This significant undertaking will continue through fiscal years 2017 and 2018. OGE will continuously increase and update its technological expertise by leveraging both external and internal sources through interagency agreements with experienced federal partners, such as the Budget Formulation and Execution Line of Business (BFELoB), established in 2007 by the Office of Management and Budget, and the National Information Technology Center of the Department of Agriculture. These arrangements will allow OGE to continue to access existing government IT expertise and rely on knowledgeable contractors with significant experience with *Integrity's* programming. In fiscal year 2016, OGE used its interagency agreement with BFELoB to obtain needed help desk support in time for the 2016 filing season. This flexibility allowed OGE to expand its resources on an as-needed basis to address periods of peak use and more efficiently obtain needed services not otherwise available to OGE.

**Performance Goal:** OGE met its goal of having 30% of public financial disclosure filers and 25% of executive branch agencies process their financial disclosure reports in *Integrity*. As noted above, at the end of fiscal year 2016, 134 agencies were processing financial disclosure reports in *Integrity*, with a total of 13,700 individual filers registered in the system. Between January 1 and September 30, 2016, those filers submitted more than 17,000 reports (OGE 278e and OGE 278-T).

#### *Actively prepared for the Presidential transition*

OGE began preparing for the Presidential transition at the end of fiscal year 2014, when it issued an updated version of its Ethics Agreement Guide. The 75-page guide has sped up the process of resolving potential conflicts of interest and increased the uniformity of nominee ethics agreements across the executive branch. In fiscal year 2015, OGE launched an initiative to conduct extensive training of its own staff to develop skills needed for the Presidential transition. That same year, OGE began actively collaborating with the Partnership for Public Service, a non-partisan group that has been active in promoting efforts to ensure a smooth transition, and other executive branch Presidential transition service providers to develop resources to support the Presidential transition. Participants included the General Services Administration, the Office of Personnel Management, and the National Archives and Records Administration.

In fiscal year 2016, OGE expanded its efforts to prepare for the Presidential transition. OGE increased its collaboration with the Partnership for Public Service and transition service provider agencies, contributing to the development of products for campaigns and the transition team, and conducting presentations. OGE increased its internal training of staff and began conducting similar training for agency ethics officials throughout the executive branch. OGE centered its 2016 National Government Ethics Summit around the theme of the Presidential transition, delivering three full days of instruction relevant to the Presidential transition to hundreds of ethics officials and other stakeholders. OGE presented a full-day symposium on financial disclosure, with separate tracks for beginner and advanced reviewers, to prepare for the

surge in financial disclosure work during the Presidential transition. In addition, OGE continued to streamline its nominee processes, automating a number of functions and going paperless for nominees who file public reports. OGE also developed and presented a Presidential Transition Readiness series of courses and workshops to continue training agency ethics officials throughout fiscal year 2016. Following passage of the Presidential Transition Act of 2016, OGE staff members began serving on the executive branch-wide Agency Transition Directors Council.

OGE also developed and published several products for use during the Presidential transition: an extensive Nominee Ethics Guide for Presidential nominees, a separate ethics guide for campaigns and the Presidential Transition Team, a comprehensive web-based financial disclosure guide, and a one-page guidance document on Certificates of Divestiture that will be useful to nominees who are required to divest financial interests:

- The Nominee Ethics Guide details what prospective nominees should expect during the nomination process, provides a conceptual overview of government ethics prohibitions, prepares prospective nominees for the public financial disclosure process, and discusses strategies for being an ethical leader. The guide also has a stand-alone appendix that contains checklists for nominee financial disclosure, explanations of legal concepts, and other important information for prospective nominees. The guide will prepare prospective nominees for the rigors of the nomination process and serve as an understandable and streamlined resource about the nomination process.
- The Transition Guide is designed to ensure that the Presidential Transition Team will be well organized and knowledgeable about the ethics review conducted as part of the nominee process. The guide identifies ways OGE can help the Presidential Transition Team, explains the ethics part of the nomination process, and provides strategies for establishing a strong ethical culture in the new Presidential administration. It also includes an introduction to the use of *Integrity* for electronic filing. At the back of the guide, OGE provides useful reference materials, including information about resources for public financial disclosure, government ethics statutes and regulations, ethics agreements, *Integrity*, and OGE issuances related to the nomination process. The information in the guide will contribute to an effective nomination process during the Presidential transition.
- The web-based financial disclosure guide is more comprehensive than OGE's previous financial disclosure guides, and provides a wealth of information to assist nominees in completing their financial disclosure and periodic transaction reports (OGE Forms 278e and 278-T). The new guide is also a valuable resource for ethics officials, in both the executive and legislative branches, who have relied on previous versions of this popular publication. The guide incorporates past issuances, describes existing practices, covers new subjects, clarifies positions, and reflects a number of policy changes designed to streamline the review process without compromising the quality of reviews. The guide is available now on OGE's website.
- The guidance document on Certificates of Divestiture is designed for officials who may request Certificates of Divestiture, and it will be useful for Presidential nominees during

the transition. OGE expects that it will also assist ethics officials by reducing recurring questions and, thereby, increasing efficiency.

OGE also conducted several briefings for major Presidential campaigns to prepare them for the challenging Presidential transition. OGE's Director made two presentations attended by both major campaigns, as part of the Presidential transition project of the Partnership for Public Service. OGE's Director and Chief of Staff also met separately with the campaigns on four occasions, and provided two briefings for each campaign. In September 2016, OGE conducted training for campaign officials on the use of Integrity for nominees' public financial disclosure reports. OGE presented the campaigns with the guides it developed in preparation for the Presidential transition. OGE also created a new section of its website to make relevant materials more easily available to the campaigns and the public, in order to support preparations for the Presidential transition.

### Planned Work for Fiscal Years 2017 and 2018

During fiscal year 2017, OGE will undertake one of its most important roles: assisting in the smooth and effective transition to a new Presidential administration. Much of OGE's work will focus on reviewing an extraordinary volume of financial disclosure reports of Presidential nominees and developing ethics agreements to resolve identified conflicts of interest. Presidential transitions are periods of peak activity for OGE with regard to nominees. OGE anticipates that most of the 1,100 non-uniformed PAS positions in the executive branch will need to be filled during the Presidential transition. This massive undertaking in connection with the transfer of power from one administration to the next requires intensive commitment of resources, which will require OGE to draw down on other areas. Key highlights of OGE's planned work are described below.

#### *Contribute to a successful Presidential transition*

In early fiscal year 2017, OGE will offer additional briefings and consultations on an as-needed basis for campaign officials engaged in planning Presidential transition activities. In addition, OGE will conduct additional training for members of the Presidential Transition Team and White House staff on OGE's electronic financial disclosure system, *Integrity*. At the same time, OGE will support agencies in counseling departing officials regarding post-employment restrictions. OGE will also provide the Transition Team and, later, the White House with a supply of the Nominee Ethics Guide for distribution to prospective non-uniformed Presidential nominees required to complete public financial disclosure reports.

OGE will also offer government ethics training concerning ethics laws and regulations particularly relevant to a Presidential Transition Team and newly appointed White House staff. Consistent with past experience, OGE anticipates that it will support the White House Counsel's Office by providing guidance on ethics issues that arise during the early days of the new Administration. In addition, OGE may provide the White House Counsel's office with support for any new ethics initiatives. Finally, upon request, OGE will provide additional information and best practices for establishing an organized and effective ethics program within the Executive Office of the President and the Office of the Vice President.

In fiscal year 2017, OGE will use a substantial portion of its staff to analyze and resolve the potential conflicts of interest of the highest-level, incoming executive branch leaders. OGE will work with agency ethics officials in drafting ethics agreements to remedy the identified conflicts of interest. OGE will then monitor compliance with these ethics agreements after the nominees are confirmed. In addition, OGE will continue providing agency ethics officials with guidance and instruction to improve their review of financial disclosure reports.

*Successfully operate Integrity and use the system to review and analyze the financial disclosure reports submitted during the Presidential transition*

In fiscal year 2018, OGE will focus on ensuring high quality system operation and support for *Integrity* as heavy use by incoming PAS nominees incident to the Presidential transition continues. *Integrity* produces high quality reports by helping filers report required information easier, and more accurately. A combination of data-entry tables and context-dependent questions helps filers identify all of their reportable financial interests and disclose those interests correctly. This feature is particularly important for nominees who, in many cases are unfamiliar with the financial disclosure reporting requirements. *Integrity* also enables agency ethics officials to more efficiently assign, review, track, and manage reports electronically. The system also allows for quick and easy retrieval of information by authorized users. In addition, because *Integrity* is web-based, users may access the system anywhere over the internet, making using the system convenient. In order to avoid disrupting smooth operations during this critical time, OGE will continue to defer all but necessary enhancements until the most high-volume nominee filing period has ended.

Fiscal year 2018 will be a significant time for *Integrity*, as the focus will remain on steady-state operations, bug-fixing and decreased functionality enhancement. OGE will use requested funding in fiscal year 2018 to ensure that the system continues to run reliably for current filers, and continues to efficiently manage the increased number and more complex filings of PAS nominees who are expected to continue to use the system during the second half of the Presidential transition. OGE will continue to be responsive to requests by the new Administration for targeted enhancements, and enhancements required to address evolving security requirements. OGE will also continue to provide support to agencies through tools, orientations, training and help desk services as new filers join *Integrity*.

*Strategic Objective 2.2: Promote leadership support of the executive branch ethics program*

The success of each agency's ethics program is in large part dependent on the commitment of the agency's leadership to, and involvement in, the ethics program. Leadership support of an agency's ethics program helps agencies identify, assess, and mitigate risk to an agency's programs and reputation. It enables agency leaders to accomplish agencies' missions in ways that ensure the integrity of government operations. Because of the significant turnover in agency leadership associated with the Presidential transition, OGE has begun to shift its focus toward developing actionable strategies for cultivating leadership support of the executive branch ethics program.

## Performance Highlights

### *Held agency's accountable for timely reviewing financial disclosures of senior leaders*

Agencies review the annual financial disclosure reports of their most senior civilian Senate-confirmed leaders and submit them to OGE for a second-level review. In turn, OGE reviews the reports for possible indications that agencies may not have conducted sufficient conflicts of interest analyses. The timely review and certification of these reports is critical because financial disclosure is the primary tool for identifying and resolving potential conflicts of interest on the part of executive branch officials. An agency's failure to collect and review PAS officials' reports, resolve all conflicts of interest, and obtain OGE's certification in a timely manner places filers at risk of violating criminal conflicts of interest laws. More broadly, it could diminish the credibility of the ethics program and undermine the public's confidence in the integrity of the government's operations.

To ensure timely review and certification of these reports by agencies, OGE tracks agencies' submission of these reports to OGE each year. In fiscal year 2014, OGE began sending year-end status reports to agency heads regarding these submissions to OGE. Sending these status reports for the past three years has produced a measurable change in the timeliness of agencies' submissions to OGE. In fiscal year 2016, for the first time, agencies completed their reviews and submitted all required 2015 reports to OGE before the end of calendar year 2015. In comparison, in fiscal year 2015, the agencies achieved full compliance with respect to 2014 reports in late January 2015. The improvement is more significant when the fiscal year 2016 results are compared to fiscal year 2014 results, and the current rate of compliance is far greater than the compliance rates for the period before fiscal year 2014. OGE's efforts in this regard have been successful.

### *Included ethics questions in high-profile Merit Systems Protection Board survey*

OGE recently identified a low cost opportunity to assess employee awareness of the ethics rules. In fiscal year 2016, OGE worked with the U.S. Merit Systems Protection Board to incorporate fifteen questions regarding ethics awareness and other issues not traditionally surveyed by OGE for inclusion its Federal Merit Systems Survey. When the results are finalized, OGE will gain access to critical information about federal employees' knowledge of ethics rules and programs at virtually no cost.

### *Raised the profile of ethics programs with agency leadership and made ethics a component of risk management*

Agency ethics officials asked OGE to assist them in raising of the profile of their agencies' ethics programs. Toward this end, in fiscal year 2016, OGE participated in the development of OMB circular A-123, which defines management's responsibilities for enterprise risk management and internal control. OGE worked with OMB to ensure that the circular highlights the critical role that agency ethics programs play in agency enterprise risk management and internal controls. OGE ensured that the circular reflects a recognition that reputational risk, which has become an emerging focus of ethics practitioners in the private



sector, should be a consideration when evaluating risk. As a result of OGE's input on behalf of the ethics community, the final circular assigns DAEOs a role in agency internal control and risk management activities, identifies reputational risk as a factor central to agency risk management, and makes the ethics program an element of internal control planning at executive branch agencies.

In fiscal year 2016, OGE also delivered presentations on organizational risk management for senior government officials. OGE delivered in-person presentations that focused on, among other things, the importance of ethics, the effect of outside perceptions of government, and the role of agency leadership in promoting the executive branch ethics program. In addition, OGE participated in a panel discussion titled "Ethics and Optics," which was part of a two-day orientation session for 300 new Senior Executive Service (SES) members. This well-received panel was designed to help participants recognize and avoid common ethical violations, identify the people who can help them navigate potential pitfalls, and encourage them to serve as ethical leaders in their own organizations. OGE also hosted a number of sessions at its 2016 National Government Ethics Summit, addressing agency leadership, enterprise risk management, and cross-organizational collaboration.

**Performance Goal:** In response to the calendar year 2015 Annual Agency Ethics Program Questionnaire, 99 percent of agencies reported that their agency leaders demonstrate support for the ethics program. In addition, ethics officials from 86 agencies indicated that they reported directly to the heads of their agencies regarding the status of their ethics programs in calendar year 2015. This is a strong indicator that ethics officials have access to top agency leaders.

#### Planned Work for Fiscal Years 2017 and 2018

OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will engage with senior leadership directly and indirectly through its collaboration with the Presidential transition team, its involvement in nominee financial disclosure reports and ethics agreement, its publications, and its education program. Key highlights of OGE's planned work are described below.

##### *Engage agency leadership in supporting a successful agency ethics program*

In fiscal years 2017 and 2018, OGE will continue to seek opportunities to engage with senior leaders in the executive branch to emphasize the importance of a strong agency ethics program and demonstrate how they, as leaders, can promote an ethical culture at their agencies.

During the Presidential transition, OGE anticipates the turnover of most of the approximately 1,100 PAS positions in the executive branch. These positions represent the most senior-level officials in the executive branch. Because senior leaders play a significant role in fostering an ethical culture, OGE will use its review of nominee reports, its development of ethics agreements, and its publications to impart to incoming leaders the importance of the ethics program and their individual roles in supporting that program. OGE will directly communicate with senior leaders during the nomination process by providing guidance that discusses strategies

for being an ethical leader. OGE's Nominee Ethics Guide, which it will distribute to Presidential nominees, emphasizes both individual ethical responsibilities and the importance of an agency's ethics program.

Another opportunity for OGE to impart to agency leaders the importance of a strong ethics program is through its oversight activities. During its program reviews of agency ethics programs, OGE will encourage agency leaders to take a visible role in the program and will recognize in its program review reports activities that agency leaders have taken to support the ethics program. In support of OMB Circular A-123, OGE will also continue to provide training on risk management and the role of the ethics program in agency enterprise risk management programs. OGE will also continue its practice of sending year-end status reports to the head of each agency regarding the annual financial disclosure reports of the agency's PAS appointees. In addition, OGE will continue to identify opportunities to communicate directly with senior leaders in government by speaking at events targeted at agency leadership.

### *Strategic Objective 2.3: Support succession planning in executive branch ethics programs*

OGE supports succession planning in executive branch ethics programs to minimize the impact of knowledgeable employees leaving the workforce. Succession planning requires the documentation of current processes, transfer of institutional knowledge, and availability of personnel prepared to assume ethics official positions at all levels of the program. OGE provides training that supports succession planning in agency ethics programs and requires agencies to respond to questions on the Annual Questionnaire regarding succession planning.

### Performance Highlights

#### *Enhanced the professional development of agency ethics officials*

In fiscal year 2016, OGE supported the documentation of current processes both directly and indirectly. To communicate to agencies the importance of documenting current processes and to track their efforts in this regard, OGE's Annual Agency Ethics Program Questionnaire asked questions about the use of standard operating procedures. Certain program review processes also focused on agencies' use of standard operating procedures, and the program review reports for plenary program reviews included recommendations for establishment or enhancement of procedures when they were lacking. In addition, OGE conducted training on model program practices through a distance-learning event and through the 2016 National Government Ethics Summit, which emphasized the importance of agency ethics offices documenting current processes. OGE has also encouraged agencies to use a sample of the inspection report form that OGE uses for certain program reviews as a checklist to conduct self-assessments of the state of their ethics programs and to take any necessary steps to address issues they self-identify.

In fiscal year 2016, OGE supported the transfer of institutional knowledge through a variety of means and issued written guidance, which it made available on its website. OGE convened quarterly meetings for the leadership of agency ethics offices to disseminate information uniformly throughout the executive branch. OGE prepared job aids and training

material for use by agency ethics officials, which OGE made available through a forum on OGE's MAX.gov site. OGE continued to host an electronic site on MAX.gov for agency ethics officials to share their own written products with one another. OGE also conducted program management training sessions that emphasized the importance of transferring institutional knowledge internal to an agency's ethics office. OGE has also actively encouraged agencies to develop knowledge libraries through intranet sites, videos, and shared network drives.

To ensure the availability of personnel prepared to assume ethics official positions at all levels, OGE provided extensive training to agency ethics officials. At the Symposium on Financial Disclosure (see page 23) and through one of its MOOCS (see page 24), OGE taught new ethics officials how to review financial disclosure forms for conflicts of interest, provide advice and counseling on the ethics rules, train their agencies' employees on applicable ethics obligations, and promote an ethical culture within their organizations. OGE also presented advanced training for experienced ethics officials on the nuances of reviewing complex nominee financial disclosure reports and addressing challenging conflicts of interest issues.

Throughout the year, OGE presented professional development opportunities for ethics officials at all levels. OGE offered monthly distance-learning events, OGE's Ethics Fundamental Series, for new ethics officials, and separate monthly distance-learning events for experienced ethics officials, OGE's Advanced Practitioner Series. OGE also regularly offered financial disclosure training for ethics officials of all skills levels, with a recent focus on preparing for a Presidential transition. OGE offered this training via the "Google+" platform, which broadcasts training sessions to hundreds of attendees in a single session. OGE also posted recordings of these training sessions on OGE's YouTube channel to provide ongoing, on-demand access.

In fiscal year 2016, OGE supported the development of new ethics officials by delivering 250 unit hours (total hours completed by all participants) of fundamental ethics education through its Intensive Curriculum for New Ethics Officials program. This program targeted new ethics officials who had a critical need for intensive and rapid professional development because they had been, or would soon be, newly assigned to ethics responsibilities as Designated Agency Ethics Officials (DAEOs), Alternate DAEOs (ADAEOs), or ethics program managers. By focusing on those officials with the greatest responsibilities, OGE provided targeted, timely support to ensure continuity of operations in agency ethics programs.

In fiscal year 2016, OGE supported the development of new ethics officials by continuing to add to its library of fundamental distance-learning series, which focuses on topics of direct interest to new ethics officials. OGE Desk Officers also met with several new agency ethics officials to provide them an overview of their responsibilities, ethics program requirements, and training opportunities to meet their professional development needs. Finally, OGE gathered information from agencies about succession planning through their responses to questions on its Annual Questionnaire. The results are reflected in the performance goal below.

**Performance Goal:** Per the Annual Questionnaire, 99 percent of agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs. The top two tools agencies reported using to address succession planning were: (1) structured training; and (2) the availability of a knowledge library (intranet, videos, and shared drives).

## Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will build on its efforts to support succession planning of agency ethics programs. In fiscal year 2017, education efforts will be conducted to the extent that resources not committed directly to supporting the Presidential transition remain available. The competing demands of the Presidential transition will likely reduce the amount of training provided, but OGE anticipates the amount provided will begin to increase again and eventually return to current levels, as the volume of work related to the Presidential transition begins to subside in the first and second quarter of fiscal year 2018. Key highlights of OGE's planned work are described below.

### *Provide targeted training to support succession planning*

In fiscal year 2018 and, to the extent resources not committed directly to the Presidential Transition remain available, in fiscal year 2017, OGE will continue its Ethics Fundamentals Series and its Advanced Practitioner Series distance-learning events to support agency ethics officials. In both fiscal year 2017 and fiscal year 2018, OGE will continue its quarterly meetings for agency ethics officials. OGE anticipates convening a training and planning session for leaders of agency ethics programs in August 2017, in part to support the continued operation of the executive branch ethics program during a time of change. OGE will also dedicate a number of sessions at the next National Government Ethics Summit to the topic of ethics program management to bolster agency ethics programs following the change of leadership. OGE will also address routinizing risk assessment and mitigation practices, creating standard operating procedures to ensure program continuity, developing techniques for briefing new leaders, and instituting self-assessment programs to ensure preparedness for staff turnover.

### **Strategic Goal 3: Promote transparency of the executive branch ethics program**

Building public confidence in the impartiality of government decision-making is at the core of OGE's mission. In support of the President's commitment to the principle of an open government, OGE directs resources toward raising the visibility of the systems in place to identify and resolve conflicts of interest and making ethics documents publicly available. Transparency increases accountability and public confidence by providing information to the public about the workings of government and the integrity of its decision-making processes.

#### *Strategic Objective 3.1: Raise the visibility of the executive branch ethics program and the U.S. Office of Government Ethics*

Raising the visibility of both the executive branch ethics program and OGE are critical steps toward building public confidence and awareness of the systems in place to protect the integrity of government operations and programs. To raise the visibility of the executive branch ethics program and the agency, OGE engages with audiences inside the federal government, as well as external audiences, including members of the general public, state and local governments, private sector organizations, professional associations, government oversight groups, the media, and foreign delegations. OGE actively shares information on its official website, on social media, through media contacts, and through presentations by OGE staff.

#### Performance Highlights

##### *Built a culture of information sharing and strategic communications*

In fiscal year 2016, OGE continued to build a culture of information sharing and strategic communications with its external stakeholders. In fiscal year 2016, a cross-divisional communications team continued to work to ensure consistency and thoroughness in OGE's external messaging, develop comprehensive communications plans for significant OGE initiatives, and create compelling and audience-friendly content for OGE's various communications platforms, including OGE's social media accounts and website. These efforts ensure that OGE disseminates information in a manner that is easily understood by and accessible to its external stakeholders. These communications also ensure that OGE's stakeholders gain a greater understanding of OGE's work and can identify opportunities for coalition building and collaboration with OGE.

In fiscal year 2016, OGE identified and remedied gaps in its communications outreach to its audiences. For example, OGE discovered that it had conducted limited outreach to the human resources community. As a result, OGE sought to engage the human resources community who are key partners in the administration of the ethics program. OGE presented at an event hosted by the Chief Human Capital Officers Summit and leveraged OPM's existing listserv for human capital officials throughout the executive branch in order to invite them to attend OGE's 2016 National Government Ethics Summit virtually.

**Performance Goal:** Increase the number of external stakeholders who are aware of OGE and the executive branch ethics program. OGE measures the success of this performance goal through various performance indicators included in Figure 14 below.

*Used OGE’s website and social media as platforms to inform and educate*

OGE’s website is its primary tool for communicating with its external stakeholders and building confidence in the systems designed to detect and resolve conflicts of interest in the federal executive branch. In fiscal year 2016, OGE rebuilt and relaunched its website in order to better control the timeliness of the content it makes available to the public, as well as significantly reduce costs. By bringing its website in house, OGE can more quickly post materials of interest to OGE’s stakeholders and respond to feedback. As part of this undertaking, OGE continued to review and update content on its website to ensure that the public can understand the work of OGE. As part of this change, OGE also increased the number of financial disclosure reports and ethics agreements that can be requested through the website. Bringing this website in house was a challenging undertaking for such a small agency, and OGE benefited from input from external groups during the process. Some good government groups requested adjustments to the website functionality for accessing financial disclosure reports and other materials, and OGE responded by implementing a number of suggestions they offered and encouraging them to provide additional feedback.

OGE uses social media to broaden its reach to key external stakeholders. Specifically, OGE uses its Twitter account to drive traffic to substantive ethics content on its website and to provide accurate information about the executive branch ethics program to the public. In fiscal year 2016, OGE continued to refine the tone and content of its Tweets to be more engaging and public-friendly, and less technical. For example, the federal gift rules are a topic of interest during the holiday season. To provide accurate information in an easy-to-digest manner on the

How are people connecting with OGE on social media?



Figure 13: Social Media

application of the federal gift rules during this time of heightened interest, OGE created a mini Twitter campaign, titled “Should Marty accept this gift?” (#ShouldMartyAcceptThisGift?). These tweets depict images of a hypothetical federal employee named Marty as he ponders whether he may accept a variety of gifts being offered to him throughout the holiday season. These tweets are linked to content on OGE’s website explaining the gift rules for federal employees. This series of Tweets had significantly higher impressions, engagements, and engagement rate as compared to the averages for the prior fiscal year.

**Performance Indicator:** An indicator of OGE’s success in expanding its outreach efforts is the increased number of new visitors to the agency’s website and the continued growth in the number of its Twitter followers. In addition, OGE continued to see an increase in size and growth of its Twitter followers (an increase of 44 percent).

*Collaborated with and engaged stakeholders*

In fiscal year 2016, OGE continued to engage with professional, good government, and interagency groups to discuss emerging ethics issues and trends, share model practices, develop sound ethics policies, and combine resources to more effectively ensure that government decisions are made for the benefit of the public and not private gain. In fiscal year 2016, OGE continued to participate actively as a member of the Ethics and Compliance Initiative (EC&I), the Council on Governmental Ethics Laws (COGEL), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE). As a member of EC&I and COGEL, OGE is able to share its legal analysis, programmatic experience, and model practices with the private sector and state and local government agencies. (For more information on OGE’s involvement with CIGIE, see page 19.) In addition, OGE participated in interagency groups such as the Performance Improvement Council (PIC) and the General Counsel Exchange to share information about OGE and the executive branch ethics program, as well as to discuss general administrative legal and performance issues faced by all executive branch agencies. OGE’s involvement with these organizations not only fosters valuable communication; it also leads to innovations in OGE’s practices related to training, program and performance management, and general law.

OGE also organized in-person meetings with ethics practitioners and the leadership of good governance and government watchdog groups in fiscal year 2016. For example, OGE continued to meet with the Partnership for Public Service to discuss ways that OGE and the Partnership could work together to help ensure a smooth Presidential transition. These meetings created opportunities to collaborate and share resources and information that enhanced the executive branch ethics program. Further, through OGE-initiated “three branch meetings,” OGE continued to collaborate with the most senior ethics practitioners from the legislative and judicial branches of the federal government on topics of common interest in the field of government ethics, such as conflicts of interest and financial disclosure. These meetings resulted in a greater understanding of approaches taken to address common issues and the differences in the role of each branch’s ethics program.

Requests for Assistance (Non-Agency Stakeholders)	
Private Citizens	123
Press	162
Congress	20
For-Profit	16
Non-Profit	8
International	3
State/Local	9
Academia	6
Judicial	0

**Figure 14: Requests for Assistance**

OGE also engaged in other efforts to build relationships with external stakeholders and promote understanding of the executive branch ethics program and OGE’s mission. OGE accepted speaking invitations to address its external audiences, including professional associations, international anti-corruption groups, and the Inspector General community, on topics including conflicts of interest, ethical leadership, and enforcement. For example, OGE presented to the DC Bar about the rules of engagement for federal employees and government contractors.

**Performance Indicator:** In fiscal year 2016, OGE accepted 19 speaking invitations to address its external audiences.

### *Responded to requests for information and provided assistance*

OGE responds to requests for information and assistance from its external stakeholders on topics such as public financial disclosure, gifts from outside sources, and post-employment. In fiscal year 2016, OGE responded to over 162 requests for assistance from the press. These interactions result in more accurate reporting about the ethics laws and regulations. These interactions also multiply OGE's ability to reach the public to promote further understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also responded to requests for assistance from other stakeholders, including 123 requests from private citizens. This assistance promotes understanding of the executive branch ethics program and related ethics laws and regulations.

**Performance Indicator:** In fiscal year 2016, OGE responded to 500 requests from non-government, external stakeholders. See Figure 14. In addition, 190 media articles highlighted the work of OGE during fiscal year 2016. Of the news media articles in which OGE and the executive branch ethics program were covered, 67 articles were connected to outreach conducted by OGE, OGE publications, or other content posted on OGE's website. This coverage helps the public understand the framework for government ethics in the executive branch.

### *Shared information with foreign delegations and supported anti-corruption efforts*

Through its international work, OGE helps shape and support global commitments to fight corruption and promote good governance. One of OGE's most significant international accomplishments in fiscal year 2016 was the support it delivered in connection with the U.S.–Kenya anti-corruption pledge signed in July 2015 by then President Obama and Kenyan President Kenyatta. Specifically, OGE assisted Kenya in the development of effective ethics training for its civil service. This assistance included a digital video conference between OGE and representatives from the Kenya School of Government and the Kenya Public Service Commission. OGE also hosted representatives of these Kenyan entities at OGE's 2016 National Government Ethics Summit in Washington, D.C. In addition, the Department of State funded the travel of an experienced OGE official who flew to Kenya and, over the course of five days, worked with senior faculty from the Kenya School of Government in Nairobi to refine its anti-corruption teaching models. The Kenya School of Government is using these models to customize anti-corruption curricula for employees at all levels of Kenya's government workforce.

In addition, an OGE representative presented at a World Bank conference on financial disclosure for the Association of Southeast Asian Nations region. The presentations included an interactive exercise that demonstrated how OGE reviews disclosures to identify and resolve conflicts of interest, and a presentation as part of a panel session on electronic financial disclosure. The conference brought together financial disclosure practitioners from around the world to share innovative approaches and good financial disclosure practices.

OGE also continued to meet with foreign public and private sector groups through the State Department's International Visitor Leadership Program and similar programs. Through these programs, foreign delegations come to OGE to learn about the executive branch's ethics



program and how that program fits under the broader rubric of anti-corruption, good governance, and transparency. In fiscal year 2016, OGE briefed 26 foreign delegations comprising 323 individuals representing 82 countries.

In addition, OGE continued to support the U.S. in fulfillment of other international obligations. In fiscal year 2016, the Group of European States against Corruption (GRECO) peer review mechanism reviewed how the U.S. prevents corruption among federal prosecutors. OGE worked with the State Department and the Department of Justice to provide detailed responses as part of the GRECO desk review and onsite visit. OGE supported other international commitments by contributing to reports on the status of U.S. anti-corruption activities in the context of the Asia Pacific Economic Cooperation (APEC) group and the peer review mechanism of the Inter-American Convention against Corruption (MESICIC).

At the request of the State Department, OGE was also active in developing international good governance standards and priorities. Of note, OGE worked throughout fiscal year 2016 to shape a recommendation on principles for managing ethics in the public service developed by the Organisation for Economic Co-Operation and Development (OECD). The OECD principles will serve as a basis for public integrity policy in OECD countries and beyond. OGE also contributed to the international dialogue by sharing U.S. practices with international organizations such as the United Nations and the World Bank.

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal years 2017 and 2018, OGE will continue to maintain its external communications efforts to raise the visibility of the executive branch ethics program generally and OGE's work, in particular. Key highlights of OGE's planned work are described below.

##### *Communicate more effectively*

Public confidence in the impartiality of government decision-making and the systems to detect and resolve conflicts of interest in the executive branch is critical. OGE has a responsibility to communicate about these systems effectively to its stakeholders. OGE has a wide spectrum of stakeholders – from experienced ethics practitioners and government watchdogs to major federal partners and the general public. OGE has learned that different audiences gravitate towards different mediums, and that a tailored message crafted to fit a specific medium has the greatest impact. In fiscal year 2017, OGE will continue to ensure that content is accurate, compelling, relevant, and tailored to the audience and communication channels. To do so, OGE will continue to use analytics to assess the effectiveness of its communications and to identify and remedy gaps in its outreach.

##### *Develop and execute comprehensive communication plans*

As needed, OGE's cross-division communications team will develop and execute comprehensive communication plans for significant OGE initiatives including the National Government Ethics Summit (see page 28). The Summit provides OGE with an opportunity to engage with its stakeholders about its important work, the executive branch ethics program, and

the many laws and regulations that govern employee conduct. Therefore, it is critical that OGE consider which stakeholders will be interested in the content and how best to reach them.

*Collaborate with and engage stakeholders through active memberships, in-person meetings, and speaking engagements*

To share information and foster valuable collaboration, OGE will continue to participate as a member of private-sector and state and local ethics organizations such as COGEL, in addition to federal interagency groups, such as CIGIE, the Chief Human Capital Officer Council, and the General Counsel Exchange. OGE will seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission. Through meetings, presentations, and online forums, OGE will also continue to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. In addition, OGE will continue to collaborate with the most senior ethics practitioners from all three branches of government to discuss issues of common interest and to build valuable relationships among the three branches through regular meetings.

*Timely respond to external requests for information and assistance*

OGE will continue to be responsive to requests for information and requests for assistance from its external stakeholders. Through such interactions, OGE aims to increase their awareness and understanding of the ethics laws and regulations and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and publishing helpful information on its website. OGE will also continue to respond to the numerous requests for information it receives from the public.

*Support United States foreign policy initiatives*

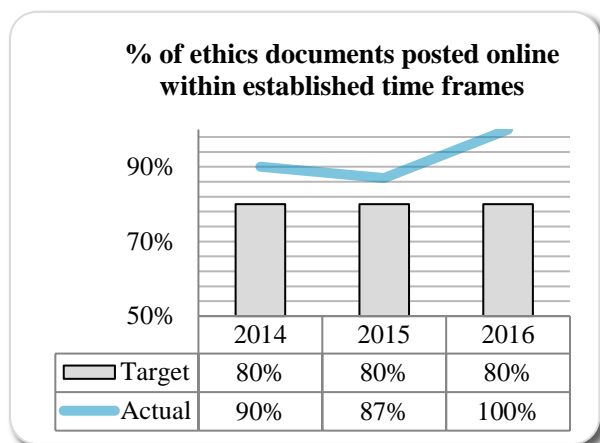
Finally, at the request of U.S. foreign policy agencies, OGE will continue to participate in international programs designed to support and enhance U.S. foreign policy initiatives and will continue to assist in the areas of anti-corruption and good governance. OGE also will continue to meet with foreign delegations to provide information about U.S. implementation of ethics and good governance programs.

*Strategic Objective 3.2: Ensure that ethics information is publicly available*

Public availability of ethics information assures the American public that senior leaders are making decisions based on the interests of the public rather than their own personal financial interests. Ethics information includes public financial disclosure reports, program review reports on agency ethics programs, and written policy guidance. The availability of this information also assists executive branch employees in understanding the basic obligations of public service, holds OGE and agency ethics officials accountable for their activities, and supports ethics officials in carrying out the duties of their positions.

## Performance Highlights

### *Timely made ethics documents available online*



**Figure 15: Posting Ethics Documents**

In fiscal year 2016, OGE continued to timely make ethics documents available on its website. These documents included public financial disclosure reports and ethics agreements, program review reports on agency ethics programs, reports on payments for travel received from non-federal sources in connection with attendance of employees at certain meetings, and written policy guidance. In fiscal year 2016, OGE also published its Open Government Plan. The plan is a public roadmap that details how OGE will incorporate the principles of transparency, participation, and collaboration, which form the cornerstone of an open government.

**Performance Goal:** OGE exceeded its target to timely post 100 percent of ethics documents online within established time frames.

### *Administered a strong Freedom of Information Act (FOIA) program*

In its annual assessment of agency progress in implementing the Attorney General’s FOIA Guidelines for 2016, DOJ’s Office of Information Policy (OIP) awarded OGE the highest possible score on an array of important measures. These included having an effective system in place for responding to FOIA requests, increasing proactive disclosures, utilizing technology, improving timeliness in responding to requests, and applying a presumption of openness in responding to FOIA requests.

OGE continues to conduct regular self-assessments of its FOIA processing procedures and response templates and, when appropriate, makes changes to increase efficiency, improve search processes, increase transparency, and otherwise improve the operation of OGE’s already strong FOIA program. In fiscal year 2016, OGE implemented a new online “self-service” portal on its website that allows requesters to view the status of their requests. OGE responded to 93% of FOIA requests within the statutory timeframe

In addition, OGE continued to engage in outreach and collaboration with the FOIA community. OGE’s Alternate FOIA Officer organized and co-presented training sessions with attorneys from DOJ’s OIP on the release of ethics documents under the FOIA, the Privacy Act, and the EIGA. Similarly, a representative from OGE’s FOIA Team, along with one of OGE’s IT Specialists, participated on OIP’s FOIA IT Working Group panel. At the panel, OGE discussed how the agency was able to develop and implement a FOIA case tracking and document management system at no cost, an innovative approach that allowed the agency access to technological solutions not commonly found at small agencies. Also, incident to creation of the

Chief FOIA Officer Council under the FOIA Improvement Act of 2016, OGE's Chief FOIA Officer and other FOIA officers and representatives discussed approaches to a new FOIA posting initiative with representatives from the media. OGE also provided written input on this issue in response to a data call from DOJ.

#### Planned Work for Fiscal Years 2017 and 2018

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2017 and 2018, OGE will continue to timely post a variety of critical ethics documents on its website. These documents include agency program review reports, policy guidance, and financial disclosure reports of high-level officials. Because a Presidential transition will occur during this time frame, OGE expects a significantly increased demand for the public financial disclosure reports of the highest -level executive branch officials.

In addition, OGE will continue to maintain a strong FOIA program. Based on the enactment of significant FOIA reform legislation in 2016, OGE revised its FOIA regulations in December 2016. OGE has experienced a significant increase in the volume of FOIA requests received, driven in part by the public's interest in the Presidential transition, which is not expected to decline. OGE will continue to provide timely responses to FOIA requests and to proactively post on its website documents released in response to FOIA requests that are of particular interest to the public.

Finally, in fiscal year 2018, OGE will publish its revised Open Government Plan. The plan is a public roadmap that details how OGE will incorporate the principles of transparency, participation, and collaboration, which form the cornerstone of an open government.

## Section IV – Managing for Results

This section describes OGE’s past and planned work related to its management objectives, the steps OGE has taken to maintain a culture of performance, and OGE’s progress toward achieving the President’s Management Agenda.

### Management Objectives

OGE devotes significant resources toward promoting professional development opportunities for its staff and undertaking process improvement. These two efforts are critical to OGE achieving its mission-focused strategic objectives. Organized by management objective, this section highlights major accomplishments that OGE achieved in fiscal year 2016, provides data on OGE’s success in achieving its management objectives and performance goals during fiscal year 2016, and describes OGE’s planned work for fiscal years 2017 and 2018. Information on how OGE will measure its progress toward achieving its management goals in fiscal years 2017 and 2018 is found in Appendix A.

#### *Management Objective 4.1: Promote professional development opportunities aimed at building OGE employees’ knowledge, skills, and abilities*

OGE is committed to meeting its employees’ professional development needs by providing significant education and training opportunities and support through the dedication of time and resources. In fiscal year 2016, OGE continued its use of a unique professional development program involving a document that OGE calls the Employee Development Plan (EDP). In addition, OGE implemented an intensive financial disclosure training program for its employees in preparation for the upcoming Presidential transition.

#### Performance Highlights

In fiscal year 2016, all OGE employees participated in the OGE Employee Development Plan (EDP) program. The EDP incorporates the requirements of OPM’s Individual Development Plan but goes further by identifying individual employee learning objectives that must be tied directly to OGE’s strategic plan and to the organizational goals of the employee’s work unit. The EDP identifies specific formal training, mentoring, self-study, and/or on-the-job training activities that the employee will complete in the covered period. Significantly, the EDP also identifies objective measures for assessing the employee’s acquisition of the targeted knowledge or skills. Often, this measurement will involve the employee’s completion of a work product or delivery of a presentation related to the training that is evaluated by the employee’s supervisor to determine whether the training was effective. To ensure accountability in this continuous learning process, the completion of the EDP is part of each employee’s performance standards. This mixture of support and accountability has helped OGE to foster a performance culture through continuous learning.

In addition to the EDP, OGE increased employee knowledge through information sharing and collaboration by periodically conducting employee meetings called Issue Forums. Staff met at these forums to discuss a wide range of ethics issues, including in-depth analyses of specific

ethics laws and regulations. These forums promoted internal communication and cross-functional knowledge sharing among employees at all levels and from all divisions. In addition to these significant investments in internal opportunities for professional development, OGE supported its employees in enhancing their knowledge and skills by sponsoring their participation in external training programs. These programs included classes at the Graduate School USA and the Treasury Executive Institute, as well as events hosted by the federal performance, legal, IT, and communications communities.

OGE continued to implement a rigorous training program for recently hired OGE employees who have duties that require them to understand and apply ethics-related legal authorities and to engage in the substantive review of financial disclosure reports. New employees were required to complete self-paced, on-demand training using OGE-produced content in the areas of conflicts of interest, impartiality, gifts from outside sources, and the review of public financial disclosure reports. In addition, all new employees were required to attend an in-person debrief of financial disclosure exercises and to attend weekly sessions with OGE instructors to engage in more in-depth discussions of applicable ethics authorities. In these sessions, employees used and discussed key statutory and regulatory authorities, as well as relevant OGE advisory opinions and Office of Legal Counsel memoranda. Employees completed exercises in which they applied various authorities, and they discussed their answers in meetings with trainers. This rigorous combination of independent study followed by small-group instruction and discussion gave the employees a deeper understanding of the key authorities they are required to apply and better prepared them to perform their duties effectively.

Finally, as discussed on page 34, OGE implemented an intensive internal financial disclosure training program to better prepare employees for the upcoming Presidential transition. OGE designed this training to increase the number of staff who would be capable of reviewing complex financial disclosure reports when the volume of Presidential nominations is expected to triple following the Presidential election.

**Performance Goal:** In fiscal year 2016, 100 percent of employees successfully completed their employee development plan.

#### Planned Work for Fiscal Years 2017 and 2018

In fiscal year 2017, OGE will continue to incorporate the requirements of the EDP into employees' performance standards. In this way, OGE solidifies its commitment to continuous learning and employee professional development. OGE will also continue to identify agency knowledge and skills gaps, and will use the EDP to train employees to fill those gaps. In addition, OGE will continue to provide significant internal and external training and development opportunities to its employees, including agency-wide internal financial disclosure training as mentioned on page 36. OGE will also continue to hold regular training sessions for new employees, as well as "Issue Forums" and other meetings for employees within the agency to share information and to develop and improve their knowledge and skills. These actions collectively will ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

## *Management Objective 4.2: Transform the way OGE conducts business through process improvement*

OGE strives for excellence by continuously reviewing and refining its strategies and processes for achieving its mission. As part of this effort, OGE continues to review and standardize its procedures and to implement new technological solutions to increase efficiency and effectiveness. Fiscal year 2016 was an outstanding year for OGE's informational technology program.

### Performance Highlights

#### *Created standard operating procedures*

In an effort to work smarter, in fiscal year 2016 OGE continued to review its processes and procedures for ways to make improvements in programs that support the ethics community and OGE's internal operations. OGE continued to streamline and standardize internal processes. In fiscal year 2016, OGE developed or updated 38 standard operating procedures. For example, OGE updated its procedures for publishing legal and program advisories, reviewing and approving Presidential candidate reports, and processing requests for ethics documents.

**Performance Goal:** OGE exceeded its performance goal to create or revise four standard operating procedures for key agency programs.

#### *Implemented significant security enhancements*

OGE successfully accomplished the implementation of executive branch-wide mandates and recommendations not completed by most agencies, especially not those as small as OGE. With careful planning, dedicated staff, management support, and the efficient use of limited resources, OGE implemented Internet Protocol Version 6 (IPv6) and two-factor authentication while maintaining high levels of network security. OGE successfully completed its implementation of IPv6 in accordance with an unfunded OMB mandate within six months of the contract award kick-off meeting. OGE met these goals despite limited staff resources, having to sever ties with two external IT partners who could not meet OGE's timeline, and having to identify new partners to support its efforts at no additional cost. OGE's results were so impressive, that OGE's CIO was asked to address the Federal IPv6 Transition Managers Meeting to share lessons learned. OGE also successfully implemented two-factor authentication to the OGE network, as well as two alternate secure authentication methods for users who are temporarily without Personal Identity Verification (PIV) cards. Two-factor authentication is the targeted standard for IT access security, and OGE achieved implementation well ahead of many larger agencies. Finally, OGE continued to monitor security controls to maintain network security. Weekly reports from DHS continue to show that the OGE network perimeter is free of known vulnerabilities.

### *Developed and launched new technological solutions*

In fiscal year 2016, OGE developed web applications and automated tools that enable the agency to conduct business with greater efficiency and effectiveness. For example, OGE launched an updated version of its Financial Disclosure Tracking System a critical tool that allows OGE staff to access financial disclosure records, reports, supporting documentation, and correspondence relevant to a filer through a single application. For more details about the benefits and features of this system, see page 18. In addition, OGE took its processes for reviewing annual and termination public financial disclosure reports and periodic transaction reports fully paperless with electronic signatures. This enhancement has eliminated steps and helped to further expedite the review process.

In fiscal year 2016, OGE successfully collected, through a public-facing web server, important agency-specific and executive branch-wide compliance information such as the Annual Agency Ethics Program Questionnaire and certain financial disclosure data. This approach created numerous benefits for OGE and agency stakeholders alike. The data submission process is streamlined for OGE customers by allowing them to enter the required information directly through the website portal, rather than emailing large attachments or having to navigate a third-party collection platform. This portal also saves valuable OGE staff time by importing data directly into OGE information management systems, eliminating the time previously required for document handling. Additionally, it reduced errors by ensuring that documents and data are properly stored. Further, because the new system collects the information in a standardized way, it enables OGE to better analyze agency data and make informed policy decisions.

### Planned Work for Fiscal Years 2017 and 2018

In fiscal year 2017, OGE will finalize its ongoing work on several IT projects. In fiscal year 2016, OGE began developing an updated version of its Agency Information Management System. OGE Desk Officers use this system daily to record critical information about the requests for assistance they receive, making it a valuable source of data. OGE will finalize this updated system in fiscal year 2017. Once updated, the system will leverage existing OGE applications to populate agency profiles to better enable OGE Desk Officers to remain knowledgeable about their assigned agencies and provide more targeted and higher quality assistance to their agencies. In fiscal year 2016, OGE also began developing an email retention system in accordance with the guidance set forth by National Archives and Records Administration. OGE expects to meet the deadline of December 31, 2016. In fiscal year 2017, OGE will also finish converting its Certificate of Divestiture program to a fully paperless process.

In fiscal years 2017 and 2018, OGE will also identify and review at least two processes in each of its divisions, select at least one of these processes from each division for standardization and streamlining, develop and implement action plans for revising the processes, and deploy the revised processes. OGE will also continue to develop internal applications that streamline current processes and improve OGE's multiple data collection efforts. Improved data collection tools



will enable OGE to better analyze data and make informed policy decisions for the executive branch ethics program.

During this period, OGE will also undertake a complete life-cycle replacement of OGE's information technology equipment, as well as enhance its network security. Notably, a strong IT infrastructure is necessary on a day-to-day basis to allow OGE to conduct its mission-critical work. This infrastructure must be timely upgraded to mitigate the risk of potential failure, to address evolving technology, and to prevent security breaches. As potential security threats against automated systems grow and become more complex, OGE must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated. To support his crucial effort OGE will use additional resources for necessary upgrades to its network infrastructure, laptops, and related peripherals and software. All of these services, equipment, and software are necessary for the security and efficiency of OGE's ongoing daily operations – in particular, to ensure a safe and secure IT environment that protects the privacy and integrity of financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch as part of the financial disclosure review process.

## Maintaining a Culture of Performance

OGE maintains a culture of performance through extensive communication, policy, accountability and performance mechanisms. Federal Employee Viewpoint Survey results demonstrate the success and opportunities for improvement stemming from these efforts.

### Performance Highlights

In fiscal year 2016, OGE pursued efforts to increase employees' understanding and commitment to a performance culture using a variety of internal communications methods. For example, OGE continued to conduct regular "all hands" meetings with the entire OGE staff to discuss progress toward meeting agency goals and to promote an understanding of OGE's priorities and direction. OGE also held regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities. OGE held supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In addition, OGE held a mid-year Strategic Objective Review to review progress on each of the agency's strategic objectives established by OGE's strategic plans. This review informed OGE's strategic decision-making, budget formulation, and near-term agency actions as well as preparation of the Annual Performance Plan.

In addition to assessing progress and emphasizing internal communications on mission-related goals and objectives, OGE took several other steps during fiscal year 2016 to maintain a culture of performance. OGE continued to support a variety of flexible work and telework schedules to further productivity and enhance employee satisfaction. Ninety-four percent of OGE employees reported that they were satisfied with OGE's telework program and 84 percent reported that they were satisfied with OGE's alternative work schedule options.

To evaluate its progress in maintaining a culture of performance, OGE participated in the executive branch-wide Federal Employee Viewpoint Survey (EVS) in fiscal year 2016,

achieving a 78 percent participation rate. The results show that OGE has a highly engaged workforce. OGE had an 82 percent score on the engagement index score which looks at questions related to leadership, supervisors, and intrinsic work experiences. OGE's score is significantly higher than the government-wide average. Further evidence of OGE's success at maintaining a culture of performance is its 95 percent positive rating for employees knowing how their work relates to the agency's goals and priorities and for employees being held accountable for achieving results. Overall, OGE's 2016 EVS results identified 59 items identified as strengths (65 percent positive or higher) and 0 items identified as challenges (35 percent negative or higher).

#### Planned Work for Fiscal Years 2017 and 2018

OGE will continue its efforts to maintain a culture of performance in fiscal years 2017 and 2018 through several initiatives. OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings, conducting mid-year strategic objective reviews, holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities, and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In fiscal years 2017 and 2018, OGE will develop and implement a new strategic plan for fiscal years 2018-2022. In addition, OGE will continue to support a variety of flexible work and telework schedules. To evaluate its progress, OGE will analyze results from the Federal Employee Viewpoint Survey.

## Section V – Conclusion

OGE will use its fiscal year 2018 budget request to support the agency’s important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business impartially by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in this justification for fiscal year 2016, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals, including its vital role in the Presidential transition. Further, as amplified in this justification, OGE will employ its fiscal year 2018 resources to make significant strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program; contributing to the continuity of senior leadership in the executive branch; and promoting transparency of the executive branch ethics program. OGE will also employ its fiscal year 2018 resources to advance its management goal of creating and promoting a culture of performance. Finally, OGE will reduce risk and ensure the technological ability of the agency to achieve its important mission-related work by replacing all of its aged information technology equipment at its expected end of life in fiscal year 2018.

## Appendix A – Fiscal Year 2017 and 2018 Performance Goals

OGE PERFORMANCE GOALS			
Strategic Goal 1: Advance a strong, uniform executive branch ethics program			
	Performance Goal	Fiscal Year 2017 Target	Fiscal Year 2018 Target
<p style="text-align: center;"><b>Strategic Objective 1.1</b></p> <p style="text-align: center;"><i>Interpret and advise on ethics laws, policies, and program management</i></p>	Legal and program advisories help ethics officials perform their job duties.	80%	80%
	Ethics officials believe OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps ethics officials perform their job duties.	80%	85%
<p style="text-align: center;"><b>Strategic Objective 1.2</b></p> <p style="text-align: center;"><i>Hold executive branch agencies accountable for carrying out an effective ethics program</i></p>	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within established time frames.	90%	90%

<p><b>Strategic Objective 1.2</b></p> <p><i>Hold executive branch agencies accountable for carrying out an effective ethics program</i></p>	<p>In cases in which OGE identifies program weaknesses, OGE's program review results in improvements in the agency's ethics program.</p>	80%	80%
	<p>Ethics agreement compliance occurs within the established time frame.</p>	90%	90%
<p><b>Strategic Objective 1.3</b></p> <p><i>Contribute to the professional development of ethics officials</i></p>	<p>Ethics officials use training products made available by OGE.</p>	80%	85%
	<p>After participating in an OGE training event, ethics officials better understand the subject matter presented.</p>	90%	90%
	<p>After participating in an OGE training event, ethics officials believe they can more effectively perform their job functions.</p>	90%	90%

<b>Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch</b>			
	<b>Performance Goal</b>	<b>Fiscal Year 2017 Target</b>	<b>Fiscal Year 2018 Target</b>
<b>Strategic Objective 2.1</b>  <i>Provide assistance to the President and the Senate in the nomination process of Presidentially-appointed, Senate-confirmed nominees</i>	Identifiable, substantive conflicts of interest of Presidential nominees for Senate-confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination.	90%	90%
	OGE successfully resolves technical reporting issues in the financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination.	90%	90%
	Agency administrators' satisfaction with the support provided by OGE on its electronic public financial disclosure filing system.	60%	70%

	OGE's electronic filing system is processing financial disclosure reports.	85% of PAS/DAEO public reports, except as designated by the White House  60% of executive branch agencies  95% of nominee public reports as designated by the White House	90% of PAS/DAEO public reports, except as designated by the White House  75% of executive branch agencies  95% of nominee public reports as designated by the White House
<b>Strategic Objective 2.2</b>  <i>Promote leadership support of the executive branch ethics program</i>	Agency leaders demonstrate support of the ethics program.	85%	85%
<b>Strategic Objective 2.3</b>  <i>Support succession planning in the executive branch ethics programs</i>	Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.	90%	90%

<b>Strategic Goal 3: Promote transparency of the executive branch ethics program</b>			
	<b>Performance Goal</b>	<b>Fiscal Year 2017 Target</b>	<b>Fiscal Year 2018 Target</b>
<p><b>Strategic Objective 3.1</b></p> <p><i>Raise the visibility of the executive branch ethics program and OGE</i></p>	<p>Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program.</p>	<p>community size and growth (social media)  # of speaking engagements (including ITA)  # of requests for assistance from non-federal sources  # of unique views on website  # of mentions in media articles</p>	<p>community size and growth (social media)  # of speaking engagements (including ITA)  # of requests for assistance from non-federal sources  # of unique views on website  # of mentions in media articles</p>
<p><b>Strategic Objective 3.2</b></p> <p><i>Ensure that ethics information is publicly available</i></p>	<p>Ethics documents are posted online within established time frames.</p>	<p>80%</p>	<p>85%</p>



<b>Management Objectives</b>			
	<b>Performance Goal</b>	<b>Fiscal Year 2017 Target</b>	<b>Fiscal Year 2018 Target</b>
<p><b>Management Objective 4.1</b></p> <p><i>Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities</i></p>	<p>OGE employees participating in the Employee Development Program successfully complete their employee development plans.</p>	<p>95%</p>	<p>95%</p>
<p><b>Management Objective 4.2</b></p> <p><i>Transform the way OGE conducts business through process improvement</i></p>	<p>Create or revise standard operating procedures for key agency programs.</p>	<p>4</p>	<p>4</p>

## Appendix B – GAO Recommendations

### *GAO-16-548, Opportunities Exist to Improve Data on Selected Group of Special Government Employees*

**GAO Recommendation:** To help ensure that agencies report consistent and reliable data, the Director of OGE should determine (e.g., through a survey of Designated Agency Ethics Officials and/or analyzing agency data) whether other executive branch agencies are experiencing data challenges similar to HHS, State, and NRC. If they are, the Director should take steps to help the agencies strengthen their data.

OGE described its plan to address the recommendation in a letter to the Committee on Homeland Security and Governmental Affairs on October 11, 2016. A copy of the letter can be found on OGE's website. OGE conducted a compulsory survey of and released a summary report of the results. A copy of the report can be found on OGE's website.



UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

— ★ —  
Preventing Conflicts of Interest  
in the Executive Branch

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