

ANNUAL PERFORMANCE REPORT



OGE
U.S. OFFICE OF
GOVERNMENT
ETHICS



FISCAL
YEAR
2022

MISSION

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

Table of Contents

About U.S OGE.....	4
Fiscal Year 2022 Performance Report.....	6
Fiscal Year 2022 Performance Highlights.....	7
Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program.....	8
Strategic Goal 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program	18
Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership	25
Strategic Goal 4: Use Transparency to Further the Oversight of the Executive Branch	28
Fiscal Year 2022 Crosscutting Advances	33
Fiscal Year 2022 Stewardship	34

Section I - About U.S. Office of Government Ethics

OGE’s Mission

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.



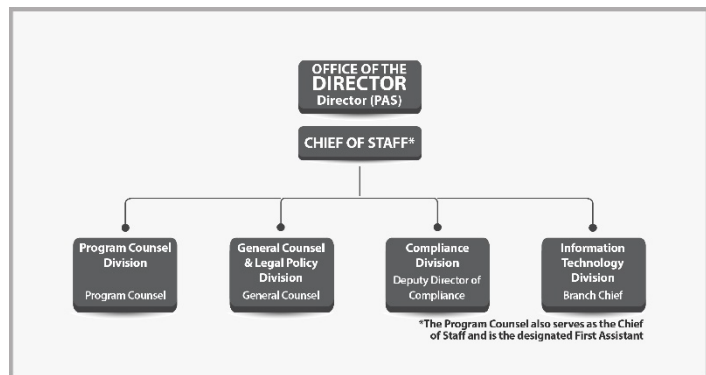
Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 130 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

Organizational Structure

Office of Government Ethics: A Small but Agile Agency

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five-year term by the President after confirmation by the Senate. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE’s career Chief of Staff and senior leadership, who work in concert to carry out OGE’s mission.



OGE and Executive Branch Agencies: A Shared Responsibility

Maintaining the trust of the citizens OGE serves is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an

effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.

The head of each executive branch agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics

and providing the necessary resources to implement a strong and effective agency ethics program.



The head of each agency is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE.

Each agency’s employees, including supervisors, human capital officials, and the agency’s Inspector General, play a significant role in maintaining the integrity of government programs and operations.

Further, OGE, and the ethics officials across the government, are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

Section II - Fiscal Year 2022 Performance Report

It is OGE’s mission to safeguard the integrity of executive branch programs and operations and to bolster public confidence in the impartiality of government decision-making. This important mission is translated into OGE’s strategic goals and objectives. OGE’s success in achieving these strategic goals and objectives is measured by its progress on established performance goals. In fiscal year 2022, OGE successfully continued delivering its mission-critical work. This section highlights OGE’s major accomplishments and progress toward achieving its strategic objectives in fiscal year 2022, as measured by its performance goals.¹ In fiscal year 2022, OGE met or exceeded 91 percent (91%) of its performance goals,² despite receiving \$1.2 million less than its requested funding.

STRATEGIC GOAL I	STRATEGIC GOAL II	STRATEGIC GOAL III	STRATEGIC GOAL IV
<p>Advance a Strong, Consistent Executive Branch Ethics Program</p> <p>Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders.</p> <p>Strategic Objective 1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program.</p> <p>Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance.</p> <p>Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, <i>Integrity</i>.</p>	<p>Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program</p> <p>Strategic Objective 2.1: Monitor agency compliance with executive branch ethics program requirements.</p> <p>Strategic Objective 2.2: Monitor senior leaders’ compliance with individual ethics responsibilities and commitments.</p> <p>Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks.</p>	<p>Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership</p> <p>Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions.</p> <p>Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process.</p> <p>Strategic Objective 3.3: Foster ethical leadership in senior officials.</p>	<p>Use Transparency to Further the Oversight of the Executive Branch</p> <p>Strategic Objective 4.1: Make ethics information publicly available.</p> <p>Strategic Objective 4.2: Reach a broader array of stakeholders.</p>
<p>Crosscutting Objective 5.1: Advance equity in OGE’s programs and improve diversity, equity, inclusion, and accessibility in OGE’s operations.</p>			
<p>Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff.</p> <p>Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness.</p> <p>Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE.</p>			

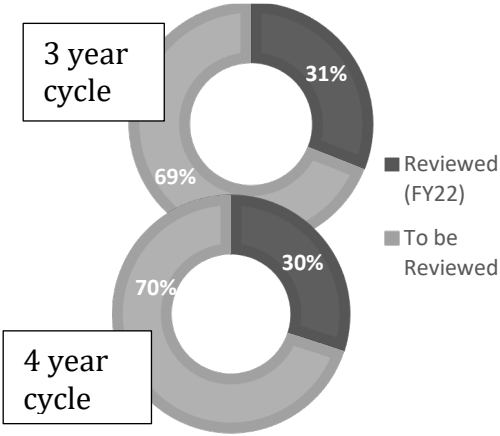
¹ The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual agency ethics program questionnaire, website analytics, and an annual survey of ethics officials to assess satisfaction with OGE’s services and products.

Section III - Fiscal Year 2022 Performance Highlights

OGE Seamlessly Delivered Mission-Critical Work

Accountability: Program Reviews

Uniformity: Ongoing Work



Guidance: Issued 12 legal and program advisories.

Expert Support: Answered more than 900 requests for advice.

Training: Made Over 150 OGE training products available online. Held consultations, workshops, and DAEO/ADAEO orientations.

Annual Public Financial Disclosures: Analyzed nearly 1,425 reports for conflicts of interest.

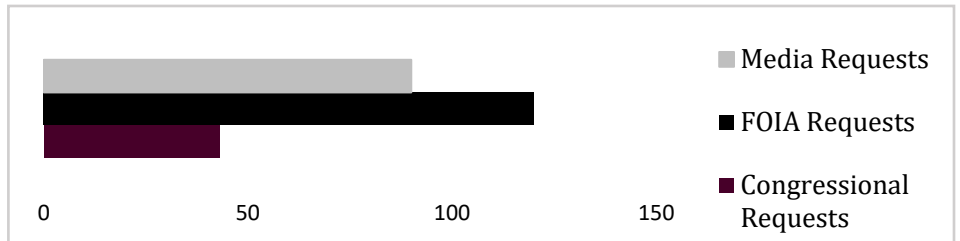


Integrity: 8th Year of Successful Operation

- Over 25,300 public financial disclosure filers used *Integrity*
- Completed 8th successful, independent security review
- 92% of agency administrators are satisfied with OGE's *INTEGRITY* support

Transparency: Continuing Public Interest in FY22

Released nearly 26,000 ethics documents to citizens, press, and good government groups.



Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program

OGE was created to prevent conflicts of interest on the part of executive branch employees. To achieve its strategic goal of advancing a strong, consistent executive branch ethics program, OGE developed four strategic objectives. These objectives are: (1.1) Provide expert guidance and support to ethics officials and other stakeholders; (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program; (1.3) Continuously refine ethics policy and issue interpretive guidance; and (1.4) Lead the financial disclosure program and provide the executive branch e-filing system, *INTEGRITY*.

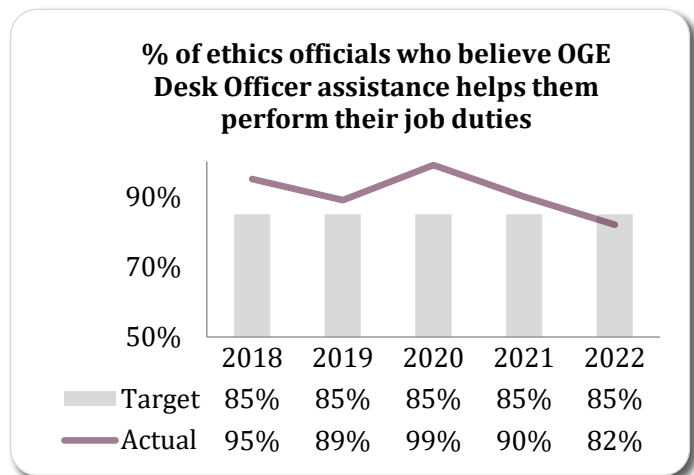
The absence of a strong, consistent executive branch ethics program with clear rules, guidance, support, training, and financial disclosure could lead to ethical lapses, improper use of taxpayer funds, and a loss of public confidence in government.

Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders

OGE achieved its objective of providing expert guidance and support to stakeholders in fiscal year 2022 through quality Desk Officer services, communications with ethics officials and other external stakeholders, and support for the work of the enforcement and international communities. Key highlights of OGE’s work are described below.

Supplied ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agencies’ leaders and employees

OGE provides extensive support to agency ethics officials so they can provide consistent and effective ethics guidance to the more than 2.7 million federal employees in the executive branch who serve the American people. This support includes providing timely, expert advice on applying the ethics laws and regulations, as well as furnishing other resources ethics practitioners need to do their jobs effectively. In fiscal year 2022, OGE Desk Officers responded to 900 calls for assistance. Thirty-three percent (33%) of those requests were related to public financial disclosure.



DESK OFFICER ASSISTANCE

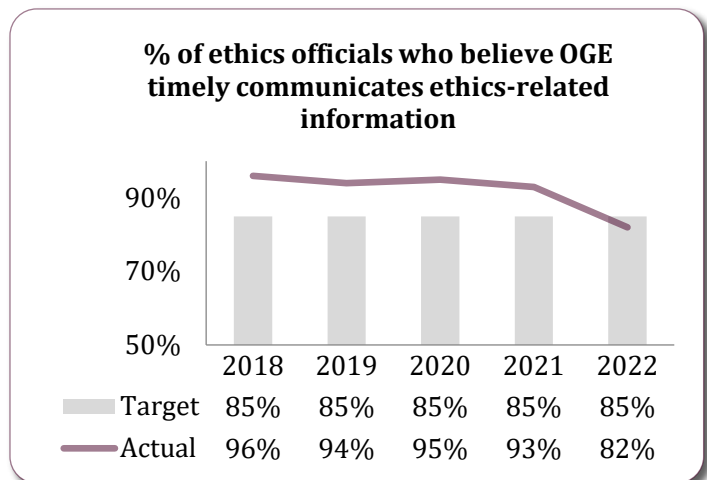
Desk Officers helped ethics officials navigate difficult policy and programmatic issues and proactively provided those officials with resources and services to assist them.

In fiscal year 2022, OGE’s Director sent a welcome letter to each new Designated and Alternate Designated Agency Ethics Official (DAEO/ADAEO) with critical details about their important roles, responsibilities, and professional development opportunities, including OGE’s DAEO/ADAEO orientation program, and the array of resources OGE provides to support agency ethics officials. OGE Desk Officers met virtually with new agency ethics officials to provide an overview of ethics program requirements and to offer OGE’s services.

Performance Goal: OGE measured the performance of the Desk Officer program by surveying ethics officials who requested assistance during fiscal year 2022. Eighty-two percent (82%) of survey respondents indicated that Desk Officers helped them to perform their job duties. Target: 85% | Actual: 82%

Communicated helpful, written guidance that was disseminated widely

In fiscal year 2022, OGE continued to provide ethics officials with up-to-date ethics information so that they can carry out effective programs for the employees they serve. OGE published advisories and other guidance in a searchable format on its [website](#), and provided notices of new guidance via the OGE listserv, which reaches approximately 3,000 ethics officials and ethics support staff. OGE also continued to host quarterly meetings with senior agency ethics officials to inform them of new guidance, resources, requirements, and trends, as well as to provide them with an opportunity to engage with each other.



TIMELY COMMUNICATION

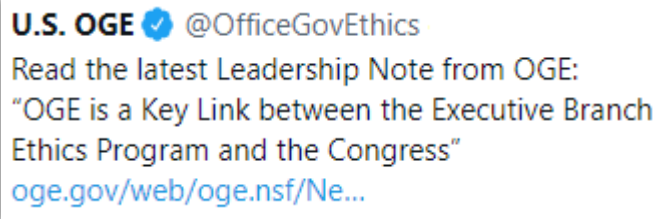
Performance Goal: OGE measured the timeliness of its communications by surveying ethics officials. Eighty-two percent (82%) of survey respondents indicated that OGE timely communicated ethics-related information. Target: 85% | Actual: 82%

Responded to requests for expert advice from critical stakeholders

OGE continued to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, professional associations,

non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, consistent understanding of the executive branch ethics program.

OGE serves as the legislative liaison for the executive branch ethics program to Congress. OGE works to build congressional understanding of the program, to inform congressional oversight, and to provide technical expertise on proposed revisions to ethics laws. Notably, OGE [responded](#) to 10 complex inquiries from members of Congress, provided 33 consultations in response to requests for technical assistance on draft legislation, and tracked 183 bills covering a wide variety of executive branch ethics issues.



OGE also represented the executive branch ethics community by providing ethics expertise on 34 requests for comment on legislative materials and Executive Orders and Presidential Memoranda circulated by the Office of Management and Budget (OMB). OGE achieved a one-hundred percent (100%) success rate for timely responding to OMB deadlines for all of the requests OGE received.

Supported the vital work of the ethics enforcement communities

OGE supports the vital work of the ethics enforcement communities, including Inspectors General and the Department of Justice, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules. OGE responded to 18 requests for expert consultations from Inspectors General offices, as well as participated actively as a member of the Council of Inspectors General on Integrity and Efficiency (CIGIE). Additional information on the training OGE provides to the enforcement communities is on page 13.

Participated actively in U.S. government anti-corruption efforts

OGE supports U.S. anti-corruption foreign policy by (1) assisting the State Department in ensuring that the U.S. meets its international anti-corruption obligations, (2) supporting U.S. participation in organizations that shape anti-corruption norms, and (3) supporting other countries' efforts to effectively manage conflicts of interest.



In fiscal year 2022, OGE assisted the State Department in ensuring that the U.S. meets its anti-corruption obligations by participating in two multilateral peer reviews, pursuant to anti-corruption treaties, and reviewing nearly 1,000 pages of anti-corruption reports, declarations, resolutions, and policy papers. OGE continued to help shape international anti-corruption norms and good governance policies in fiscal year 2022. For example, OGE continued to provide support to the implementation of the National Security Study Memorandum on Establishing the Fight Against Corruption as a Core United States National Security Interest.

OGE continued to meet with foreign public and private sector groups about the executive branch ethics program to discuss how the ethics program fits into the broader context of anti-corruption, good governance, and transparency. In fiscal year 2022, OGE briefed 7 foreign delegations comprising 76 individuals representing 23 countries.

Strategic Objective 1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program

OGE strengthened the expertise of officials who are integral to the executive branch ethics program by conducting virtual learning events, maintaining an extensive library of ethics resources, and educating other officials that are integral to the executive branch ethics program.

Prepared ethics officials at all levels to train, advise, and support their employees and further their agencies' missions

Well-trained ethics officials help agency leaders and employees manage risks every day. Ethics officials must have the knowledge, skills, and abilities necessary to provide expert counsel, identify and resolve conflicts of interest, deliver quality training, and manage effective programs, making their ongoing professional development vital to the strength of the ethics program. In fiscal year 2022, OGE provided the following for ethics officials:

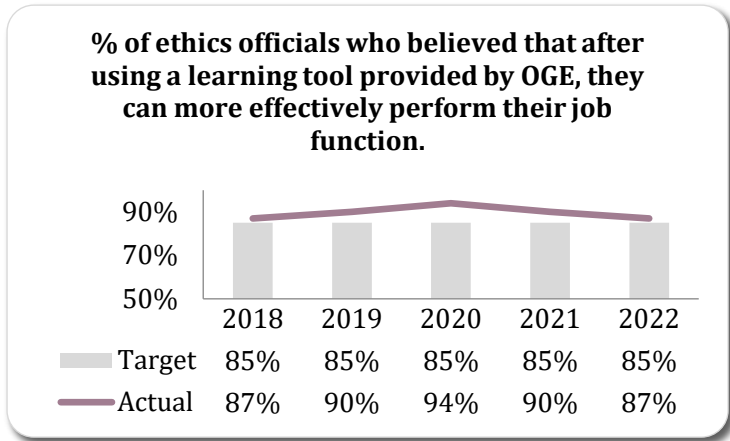
Orientations: OGE conducted two multiday orientations for new DAEOs and ADAEOs to introduce them to their roles and responsibilities as ethics program leaders. Nearly 110 senior officials participated in these training sessions.

Virtual Workshops: In fiscal year 2022, OGE held 13 virtual workshops on financial disclosure reviews and annual ethics trainings. These workshops provided ethics officials with the opportunity to learn from their peers in small discussion groups and improve their own ethics programs. From practices and ideas shared at workshops, OGE created content for the entire ethics community.

Consultations: In fiscal year 2022, OGE held consultations with four ethics program leaders from four agencies across the executive branch to help them formulate

communications strategies to promote ethics in their agencies. OGE met with leaders from NCUA, VA, DOI and USDA.

Virtual Library: To ensure that ethics officials across the nation have access to OGE’s training, OGE continued to broadcast its virtual training sessions through social media platforms and made them publicly available through OGE’s website. In fiscal year 2022, training videos were collectively viewed nearly 18,900 times with an average duration of 10 minutes.



LEARNING TOOLS

Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believed that after using a learning tool provided by OGE, they can more effectively perform their job functions. Target: 85% | Actual: 87%

Began to create new professional development opportunities for ethics officials

In fiscal year 2022, OGE took initial steps to develop a new approach to training to remove barriers and improve equitable access to a career progression in ethics. OGE conducted surveys and hosted listening sessions with ethics officials to seek feedback on its

plan to establish new professional development opportunities, including certificates for ethics officials at all career levels to further build expertise in financial disclosure, advice and counsel, communication, education and training, and program management.



Created opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies

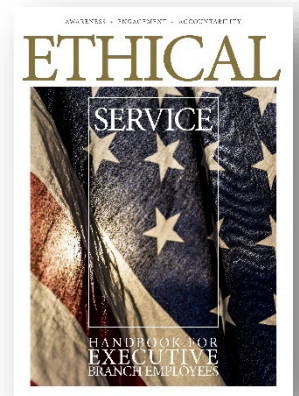
In fiscal year 2022, OGE continued to create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies. For example, OGE launched a new monthly “flash networking” series to provide ethics officials with an opportunity to build their professional networks. OGE held 12 sessions, which were attended by 150 individuals.



Improved the delivery and content of ethics education at agencies, including a focus on equity

OGE recognizes that maintaining strong ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. To support the ethical service of all executive branch employees, OGE maintains a collection of training resources for new and current federal employees, creating templates for ethics officials to use when communicating about ethics within organizations.

In fiscal year 2022, OGE took initial steps to identify promising practices to support ethics officials in delivering accessible and inclusive training to all federal employees.



Educated other officials who are integral to the executive branch ethics program

In support of OGE’s goal of a strong, consistent ethics program, OGE provided advice and training to the various enforcement communities. In fiscal year 2022, OGE routinely assisted Inspectors General and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations. OGE also provided an array of training to Inspectors General, including well-received training to 45 attendees at the Inspector General Criminal Investigator Academy, focusing on investigating ethics-related matters and working with ethics officials.

Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance

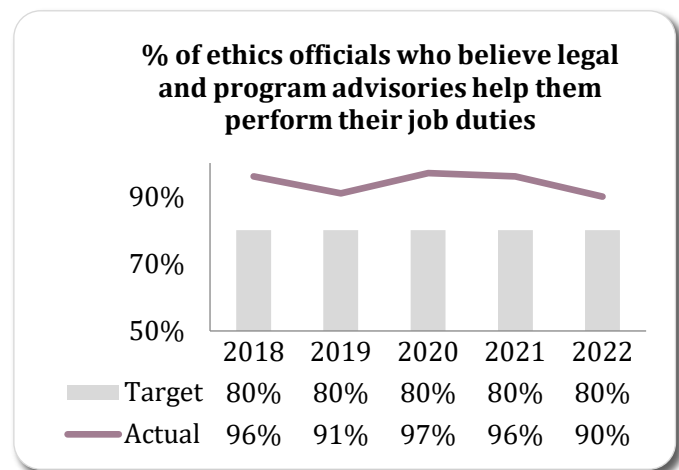
In fiscal year 2022, OGE continued to review, refine, and issue interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE's work are described below.

Provided timely ethics guidance

In fiscal year 2022, OGE issued seven legal advisories, providing guidance on emerging ethics issues, such as digital assets, and in response to agency ethics officials on specific questions from employees. In developing these advisories, OGE continued to use an evidence-based approach to determine topics, as well as to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance.

In addition to legal advisories, OGE issued five timely and informative program advisories covering ethics program requirements. OGE used its listserv, website, Desk Officer services, and training broadcasts to ensure its guidance is widely disseminated.

Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believe advisories helped them perform their job duties. Target: 80% | Actual: 90%



ADVISORIES

Published proposed and final ethics rules

In fiscal year 2022, OGE worked to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards) by working on a draft proposed regulation. The proposed amendments seek to update the Standards based on OGE's experience gained from application of the regulation since its inception, and to include the principles contained in the Executive Order 13985 to advance equity. The proposed amendments also incorporate past interpretive guidance, and add and update regulatory examples to make them more inclusive, improve clarity, update citations, and make technical corrections. OGE plans to publish a proposed and final rule in fiscal year 2023.

In fiscal year 2022, OGE also published a proposed regulation further modifying the Standards to address the conditions under which an executive branch employee may

accept a gift of legal expenses. In fiscal year 2023, OGE plans to publish a final legal expense fund regulation.

OGE also began an in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions, including soliciting feedback from ethics officials. In fiscal year 2023, OGE plans to publish a proposed rule amending the regulatory exemptions at 5 CFR part 2640. An anticipated goal of the proposed rule is to provide more clearly delineated exemptions, as well as exemptions that are more targeted to better address potentially conflicting financial interests.

Milestone: OGE took steps necessary to publish a proposed regulation to modernize the Standards of Ethical Conduct for Employees of the Executive Branch.

Evaluated and responded to requests from agencies to tailor their ethics programs

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 2022, OGE jointly issued revisions to two supplemental regulations (USPS & DoD), and worked on supplemental regulations for a number of other agencies, including the Securities and Exchange Commission, Federal Mediation and Conciliation, Department of Veterans Affairs and National Transportation Safety Board.



Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, INTEGRITY

In fiscal year 2022, OGE operated *INTEGRITY*, maintained and updated key financial disclosure forms, and provided key financial disclosure resources. Highlights of OGE's work are described below.

Operated INTEGRITY, the executive branch e-filing system for more than 90% of public filers

OGE also worked to ensure that *INTEGRITY* continued to reliably and securely operate for the high volume of nominees using the system during the post-election period and the thousands of current



filers and reviewers who rely on the web-based system every year at no cost. To keep the system up-to-date, OGE completed a major, required technical upgrade of *INTEGRITY's* content management system. As with every year, OGE also underwent and successfully completed an independent security review. In addition, OGE continued to convene regular *INTEGRITY* Advisory Council meetings to provide a forum for agencies to discuss and prioritize upgrades to the system. As a result of this process, OGE made adjustments to agencies' ability to bulk download filings in order to assist them in better responding to large information requests from the public.

Milestone: OGE addressed all independent security review findings.

Provided extensive support to users of INTEGRITY

OGE continued to provide high-quality support for users and agencies to the system's more than 35,700 users (filers, administrators, and reviewers) by providing outstanding Help Desk services, making available training resources and tutorials, and providing regular training opportunities for both new and experienced users through monthly webinars. In fiscal year 2022, OGE updated its online resources to provide more targeted written instructions to groups of users for commonly recurring questions and to assist with frequently performed tasks. Finally, OGE engaged in outreach to the user agency community by administering an annual User Support Survey, which allows agency *INTEGRITY* administrators to provide feedback on *INTEGRITY* assistance, resources, and training.

Performance Goal: OGE exceeded its goal for the percentage of agency administrators who are satisfied with the support provided by OGE on its electronic public financial disclosure filing system. Target: 80% | Actual: 92%

Maintained and updated uniform public and confidential financial disclosure forms

OGE is responsible for maintaining uniform public (OGE Form 278e) and confidential (OGE Form 450) financial disclosure forms for use across the executive branch. In fiscal year 2022, OGE reviewed both the public and confidential financial disclosure form and received approval for their renewal from OMB. OGE also created a new process for seeking more extensive and actionable stakeholder feedback during the renewal process.

Milestone: OGE renewed OGE Form 278e and OGE Form 450.

Provided guidance on the public and confidential financial disclosure programs

As the leader of the financial disclosure systems in the executive branch, OGE develops and provides extensive financial disclosure resources for both financial disclosure reviewers and filers executive branchwide. In fiscal year 2022, OGE began the process of updating one of its most widely used and well-regarded resources: the Public Financial Disclosure Guide. This interactive Guide assists individuals who file or review public

financial disclosure reports (OGE Form 278e or OGE Form 278-T). OGE also maintained a comprehensive training curriculum for all individuals with a role in the public and confidential financial disclosure system.

Performance Goal: Established baseline. Eighty-eight percent (88%) of ethics officials believed financial disclosure resources provided by OGE (e.g., the Public Financial Disclosure Guide, Confidential Financial Disclosure Guide, Financial Disclosure Playlist, etc.) assist reviewers of financial disclosure reports.

Evaluated and responded to requests from agencies to use alternative financial disclosure forms

In fiscal year 2022, OGE evaluated and responded to three requests from agencies to use alternative financial disclosure forms. Because of special or unique agency circumstances, the alternative procedure approval process is intended to provide an agency with the most effective tools possible for preventing and detecting conflicts of interest. For example, an agency may have separate authority to collect information under OGE-approved supplemental ethics regulations or specific statutory authority.

Strategic Goal 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program

As the supervising ethics office of the executive branch, OGE is responsible for conducting oversight to ensure that each of the more than 130 executive branch agencies has a compliant ethics program and that senior leaders fulfill with their ethical commitments. OGE's work in this area is vital, because when an ethics program fails or a senior leader fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective ethics program, OGE has developed three strategic objectives. These objectives are: (2.1) Monitor agency compliance with executive branch ethics program requirements; (2.2) Monitor senior leaders' compliance with individual ethics responsibilities and commitments; and (2.3) Use OGE's authorities to address known or potential ethics risks.

Strategic Objective 2.1: Monitor agency compliance with executive branch ethics program requirements

In fiscal year 2022, OGE continued to conduct reviews of agency ethics programs and to collect data about each agency's program and the overall executive branch ethics program. OGE also continued to request ethics program data from agencies to address in real time issues that require oversight. Key highlights of OGE's work are described below.

Identified program weaknesses (non-compliance) with ethics program requirements on a new accelerated review cycle

OGE conducts agency ethics [program reviews](#) as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch.

OGE reviews agency programs to identify and report on the strengths and weaknesses of the programs by evaluating (1) agency compliance with ethics requirements established in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. OGE examines all elements of an agency ethics program, including: program administration; financial disclosure; education and training; ethics counseling; agency-specific ethics rules on outside employment; conflict remedies; enforcement; and special government employees.

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation directing the agency to take actions necessary to correct the deficiency. OGE then conducts follow-up reviews to evaluate agencies' progress in implementing any recommendations made in OGE's program review reports. To enhance

transparency and accountability, OGE continues to [publish](#) all program reviews and follow-up program reviews on its website.

In fiscal year 2022, OGE accelerated the frequency of its review of agency ethics programs. OGE moved from reviewing all agencies either every 4 or 5 years to reviewing all agencies every 3 or 4 years based on an agency’s risk profile.

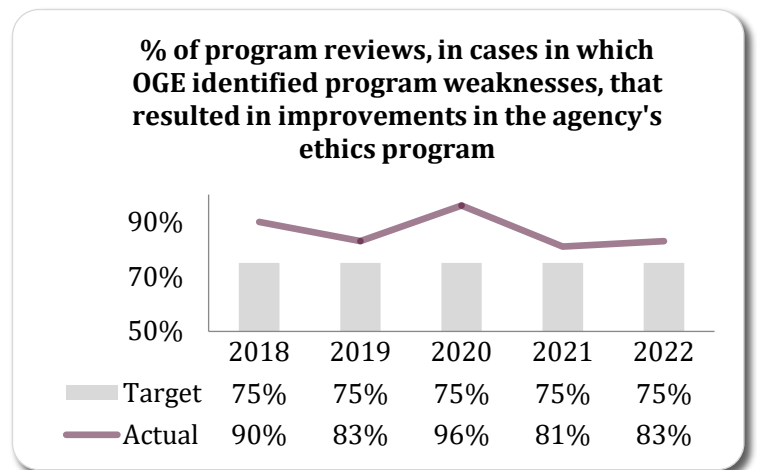
OGE conducted 42 program reviews resulting in 82 recommendations. For example, OGE issued 35 recommendations related to agencies’ administration of financial disclosure systems and, in some cases, individual financial disclosure reports/filers. OGE also found 24 additional deficiencies that would have resulted in recommendations had they not been corrected prior to the completion of OGE’s review. OGE provides considerable technical assistance to agencies in correcting problems as part of its program review process, which may allow an agency to take immediate action and preclude the necessity of issuing a recommendation.

In fiscal year 2022, OGE conducted 22 follow-up reviews resulting in 59 recommendations closed. Each quarter, OGE posted [dashboards](#) displaying the number of open program review recommendations at the end of each quarter.

Target	Actual
3-year cycle - 29 agencies reviewed	3-year cycle - 26 agencies reviewed
4-year cycle - 13 agencies reviewed	4-year cycle - 16 agencies reviewed

Performance Goals: OGE met its target to review 42 agencies.

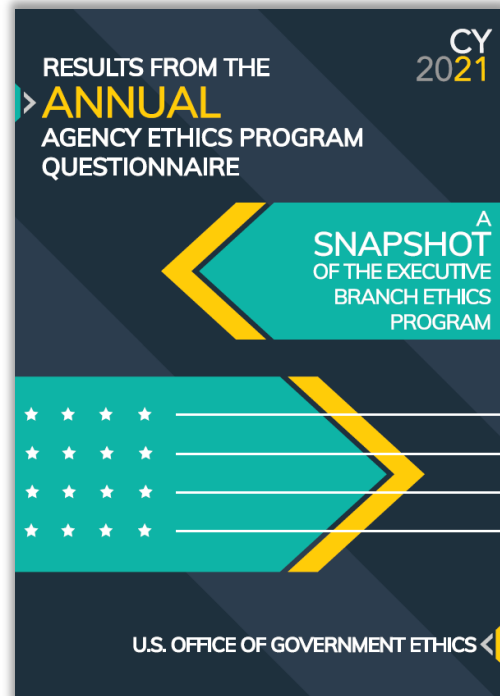
In cases in which OGE identified a program weakness during a program review, OGE exceeded its target for the percentage of program reviews that resulted in improvements in the agency’s ethics program. Target: 75% | Actual: 83%



PROGRAM REVIEW RECOMMENDATIONS

Collected, evaluated, published, and took action based on executive branch ethics program data

As part of OGE’s oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects the data through its [Annual Agency Ethics Program Questionnaire](#). In fiscal year 2022, OGE attained 100 percent compliance from the more than 130 agencies required to submit their data. OGE rigorously reviewed agency responses and followed up with agencies, as needed. OGE then continued its practice of publishing a summary report of the aggregate data and posting individual agency responses on its website to increase transparency and oversight. OGE also continued to use the data to provide training on the results, and to encourage agencies to use the questionnaire, both as a self-assessment tool and to benchmark their own agency against similarly situated agencies.



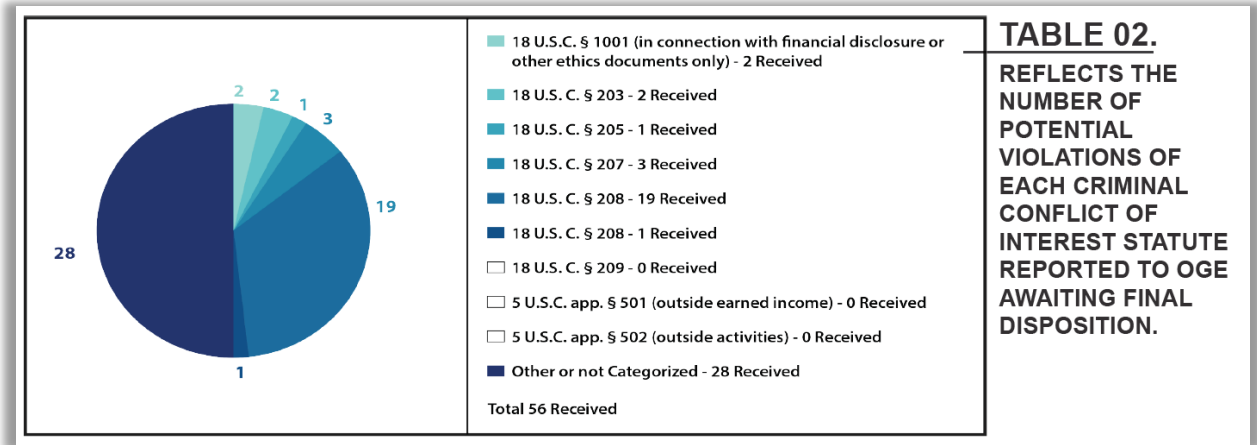
In addition, in fiscal year 2022, OGE held its triennial Data Call for Agency Practices. This data call focused on agency practices for fulfilling requests for ethics documents released under the Ethics in Government Act. The results of this data call provided OGE with insight into each agency’s implementation of this key element of their ethics program. OGE uses the data to tailor the guidance and support it provides to agencies. In addition, OGE made the results of the data call available to the public in a summary report posted on its [website](#) and shared the results with executive branch ethics officials so they can learn from other practitioners.

OGE also continued to serve as the repository for biannual reports (1353 Travel Reports) that document payments of travel accepted from non-federal sources. Although OGE has no role in providing guidance on the travel regulations, OGE makes these reports available, as required by statute, and in fiscal year 2022, improved how individuals access these reports by placing them in a table sortable by fiscal year, time period covered by the report, and agency.

Collected, analyzed, and published information on potential ethics violations by executive branch employees

Agencies are required to concurrently notify OGE’s Director when referring any matter to the Department of Justice involving a potential violation of a criminal conflict of interest law by an executive branch employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action if prosecution is declined. While OGE primarily works to give the public reasons to trust their

government, OGE also acknowledges when officials violate that trust. For example, OGE annually publishes a [survey of ethics-related prosecutions](#), which shows the consequences for failing to abide by the ethics laws and regulations. In fiscal year 2022, OGE also continued to post [quarterly dashboards](#) displaying information regarding referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.



Strategic Objective 2.2: Monitor senior leaders' compliance with their individual ethics responsibilities and commitments

In fiscal year 2022, OGE continued to monitor agency leaders' compliance with their ethics agreements and provided a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's work are described below.

Collected and published documentation of senior agency leaders' compliance with their individual ethics commitments

In fiscal year 2022, OGE continued its efforts 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 by monitoring compliance with the commitments in their ethics agreements. OGE continued to collect a Certification of Ethics Agreement Compliance from each appointee, which requires each appointee to personally attest that they have complied with the terms of their ethics agreement. In support of transparency and accountability, OGE [posts these certifications](#), as well as notices of late compliance and

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE
	b. Position Title:	to be completed by OGE
	c. Agency:	to be completed by OGE
	d. Date Ethics Agreement Signed:	to be completed by OGE
	e. Date Confirmed:	to be completed by OGE
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE

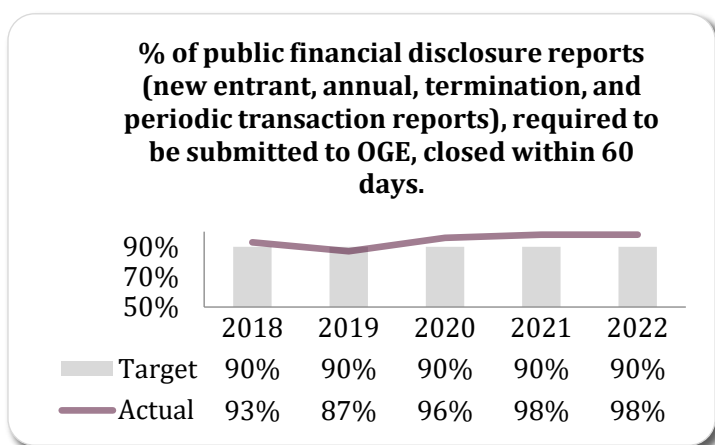
notices of late compliance and

extensions, on its website. In the event that a PAS official is more than 30 days late in submitting their Certification or submits a Certification that indicates a substantive deficiency in complying with the terms of their ethics agreement, OGE will notify the Senate committee of jurisdiction, as appropriate.

In fiscal year 2022, 385 PAS appointees were required to certify that they had complied with their ethics agreements. OGE received certifications from one-hundred percent (100%) of the PAS appointees.

Conducted expert second-level reviews of senior agency leaders' periodic and annual financial disclosure reports

OGE continued to collect and review the periodic transaction, annual, and termination reports of PAS filers to ensure that filers continue to comply with their ethics agreements and that agencies timely review these disclosures for conflicts of interest. In fiscal year 2022, OGE closed 1,423 reports. OGE continued to provide the public with timely access to these disclosures on its [website](#). OGE also continued its practice to provide each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act.



FINANCIAL DISCLOSURE REVIEW

Performance Goal: OGE exceeded its target to close ninety percent (90%) 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. Target: 90% | Actual: 98%

Analyzed, responded to requests for, and made publicly available Certificates of Divestiture (CDs) issued by OGE

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain employees may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. In fiscal year 2022, OGE issued 249 CDs and timely published

information about each CD it issued to the [Officials' Individual Disclosures Search Collection](#) on its website.

Consulted with agencies on waivers for their employees to the primary criminal conflict of interest law, 18 U.S.C. § 208

The primary criminal conflict of interest law, 18 U.S.C. § 208, prohibits employees from participating in certain government matters affecting their own financial interests or the interests of certain persons with whom they have ties outside the government. In some cases, a waiver to these restrictions may be appropriate if the financial interest is “not so substantial as to be deemed likely to affect the integrity of the services which the government may expect from such officer or employee.” In fiscal year 2022, OGE consulted with agencies on approximately 80 waivers, prior to their issuance, and collected copies of final waivers.

Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks

Although limited by statute,³ OGE continued to use its authorities and oversight role to address known or potential ethics risks.

Inquired and potentially intervened if an agency ethics program appeared to OGE to be out of compliance with ethics requirements

OGE continued to conduct real-time inquiries and reviews in response to data, news, or external sources that suggest that an agency ethics program is out of compliance. In fiscal year 2022, OGE conducted approximately five inquiries.

Notably, in fiscal year 2022, OGE also formalized its written procedures and tracking systems to establish when OGE conducts such inquiries and reviews to improve consistency.



Milestone: In fiscal year 2022, OGE developed formal written procedures to document the process described above.

³ The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rests with the management of the employing agency, the relevant inspector general’s office, or in the case of alleged crimes, the Justice Department. *See* 5 U.S.C. app. § 402. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an appointee’s compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE’s only recourse would be to notify the President. *See* 5 U.S.C. app. § 402(f)(2)(A).

Inquired and potentially held the employing agency accountable for action when one of its employees appeared to OGE to be out of compliance with ethics requirements

Although OGE’s primary mission is prevention, when OGE is made aware that an employee appears to be out of compliance with ethics requirements, OGE may take one of the following steps: make inquiries to the employee’s agency ethics officials; determine whether the agency is taking sufficient remedial actions; recommend that the agency investigate or take corrective or disciplinary action; and determine whether further investigation is required. If further investigation is required, OGE may recommend that the agency refer the matter to the agency’s Inspector General. After an investigation by the agency and/or an Inspector General, OGE will consider whether any further action is required. If OGE determines the noncompliance was the result of a systemic problem with the management of the agency ethics program, OGE may evaluate the program through an unscheduled program review.

In rare cases, OGE may directly refer a case to the Inspector General for investigation when OGE is in the best position to know the facts, such as when directly involved in reviewing a nominee’s or employee’s public financial disclosure report. OGE can also use its authority to decline to certify a public financial disclosure report that comes to OGE for review. While OGE can make referrals and decline to certify reports, OGE is statutorily prohibited from making determinations that a past action constitutes a violation of a criminal ethics law.

In fiscal year 2022, OGE made one inquiry to an employee’s agency ethics officials; determined one time whether the agency was taking sufficient remedial actions; recommended zero times that the agency investigate or take corrective or disciplinary action; and determined zero times whether further investigation is required.

Milestone: In fiscal year 2022, OGE developed formal written procedures to document the process described above.

Used transparency to hold agency leaders and ethics programs accountable

OGE uses transparency to hold agency leaders and ethics programs accountable. In fiscal year 2022, OGE published more than 2,600 individual ethics documents and agency ethics program documents. This includes oversight correspondence, program review reports, Annual Questionnaire responses, 1353 travel reports, as well as public financial disclosures, ethics agreements, related compliance documents, Pledge Waivers, and Certificates of Divestiture. Without this transparency, the public could not as meaningfully oversee the integrity of its government. See page 28 for more information.



Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership

OGE has a vital role in supporting the President’s constitutional duty to nominate and appoint officers to the executive branch. OGE helps top executive branch officials resolve conflicts and demonstrate ethical leadership to create an ethical culture in their agencies.

To achieve its strategic goal of helping top executive branch officials resolve conflicts of interest and demonstrate ethical leadership, OGE has developed three strategic objectives. These strategic objectives are: (3.1) Carry out OGE’s statutory role in preparing for and supporting Presidential transitions; (3.2) Assist the President and the Senate in the Presidential appointments process; and (3.3) Foster ethical leadership in senior officials.

Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions

In fiscal year 2022, OGE carried out its statutory role in preparing for and supporting Presidential transitions. Key highlights of OGE’s work are described below.

Developed comprehensive training plans



To be able to effectively carry out its unique role in the Presidential transition, in fiscal year 2022, OGE began to develop comprehensive training plans for both ethics officials and OGE staff, including building internal capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition. This plan was developed using feedback collected from ethics officials, as well as an internal analysis of OGE’s 2020 staffing plan.

Milestone: OGE met its milestone to begin development of OGE’s staffing plan.

Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process

In fiscal year 2022, OGE continued to thoroughly review the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed (PAS) nominees. OGE reviewers worked with officials at various federal agencies and the White House to resolve potential conflicts of interest through written ethics agreements. Key highlights of OGE’s work are described below.



Conducted expert second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions

In fiscal year 2022, OGE continued to work with agency ethics officials to identify and resolve any conflicts of interest that incoming PAS leaders may have. OGE identifies and resolves potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations.

OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process.

In fiscal year 2022, OGE worked with agencies and filers to identify and resolve potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. In addition, OGE worked with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act. Lastly, OGE timely transmitted each review package, consisting of the financial disclosure report and ethics agreement, directly to the Senate following a Presidential nomination.

Nominee reports range from three pages to hundreds of pages in length. Over the years, new, more complex financial instruments have been created. This ongoing innovation and proliferation of very complex financial instruments poses a challenge for the agency. OGE needs to research and understand each new asset. Staff then must determine the financial disclosure reporting requirements for these new financial instruments, analyze the potential conflicts of interest issues, and determine if any exemption would apply to the asset. Developing remedies for potential conflicts related to more sophisticated products creates additional challenges. As an example of the agency’s work in this area, in fiscal year 2022, OGE issued new guidance on cryptocurrency, stablecoins, non-fungible tokens, fractionalized non-fungible tokens, and related investments. In addition, OGE is in the process of updating its public financial disclosure guide to incorporate this guidance.

Performance Goal: OGE exceeded its target to provide, within established time frames, initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments to agencies within established time frames. Target: 85% | Actual: 96%

Notably, the volume of reports reviewed remained high. OGE reviewed 370 reports, which represent approximately 34 percent (34%) of all PAS positions. Further, OGE cleared 99 percent (99%) of the nominee reports it received in fiscal year 2022.

Performance Goal: OGE exceed its target to certify final financial disclosure reports of Presidential nominees for Senate-confirmed appointments within seven calendar days of receipt from the agency. Target: 90% | Actual: 97%

Strategic Objective 3.3: Foster ethical leadership in senior officials

In fiscal year 2022, OGE continued to seek opportunities to engage senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities. Key highlights of OGE’s work are described below.

Maintained regulatory standards and communicated with officials about them

Each agency head is responsible for, and must exercise personal leadership in, establishing and maintaining an effective agency ethics program and fostering an ethical culture in the agency. To that end, OGE maintains specific regulatory ethics standards for senior leaders and managers.

In fiscal year 2022, OGE continued its practice of engaging with senior leadership directly through one-on-one meetings with OGE’s Director and delivering written welcome letters on the importance of ethical leadership to all PAS officials. In fiscal year 2022, OGE sent 371 welcome letters to new PAS officials and published [12 Leadership Notes](#).



OGE also continued to provide briefings to new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public’s trust. In fiscal year 2022, OGE delivered two of these briefings to approximately 300 individuals. Through

these engagement opportunities, OGE and agencies convey the importance of and techniques for leading ethical organizations.

Performance Indicator:

- 2 meetings held with senior leaders
- 4 trainings conducted
- 383 messages sent to leaders

Strategic Goal 4: Use Transparency to Further the Oversight of the Executive Branch

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility by making ethics documents publicly available and raising the American public's awareness about the systems in place to prevent conflicts of interest and mechanisms available to hold their government accountable. Without this transparency, the public could not meaningfully oversee the integrity of its government.

Without transparency, the public could not meaningfully oversee the integrity of its government.

To achieve its strategic goal of using transparency to further oversight of the executive branch, OGE has developed two strategic objectives: (4.1) Make ethics information publicly available; and (4.2) Reach a broader array of stakeholders.

Strategic Objective 4.1: Make ethics information publicly available

In fiscal year 2022, OGE continued to make ethics documents publicly available. Key highlights of OGE's work are described below.

Provided timely access to ethics information and made ethics information easy to locate and understand

In fiscal year 2022, OGE continued to timely post a wide variety of ethics documents on its website to ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making. OGE makes publicly available key information about nearly all of its activities as the supervising ethics office of the executive branch. Available documents include agency program review reports, policy guidance, information about each agency's ethics program, documentation of senior



leaders' compliance with ethics commitments, and financial disclosure reports of high-level officials.

Of significance, in fiscal year 2022, OGE processed 15,337 requests from the public and the news media to inspect nearly 26,236 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, and other covered records. Notably, this is a forty percent (40%) increase in requests from the previous fiscal year.

In addition, OGE worked in fiscal year 2022 to make the ethics information it provides easy to locate and understand, by enhancing the OGE website, holding a call with the press to improve the accuracy of reporting, and providing a point of contact at each agency for submitting document requests on [OGE's ethics contact page](#).

OGE also began working to address the potential inequitable awareness of, and access to, ethics records by underserved communities. In fiscal year 2022, OGE began analyzing its communications and incorporating more [plain language](#) to remove barriers to access and understanding.

Performance Indicator:

- 26,236 ethics documents requested
- Implemented customer experience improvements

Maintained a responsive Freedom of Information Act program

The Freedom of Information Act (FOIA) is critical in helping to ensure transparency in government by providing the public with access to important documents. OGE demonstrates its commitment to a responsive FOIA program by maintaining an effective system for responding to FOIA requests, increasing proactive disclosures, using technology to more effectively communicate with requestors, tracking requests and managing FOIA program records, improving timeliness in responding to requests, and applying a presumption of openness in responding to requests. In fiscal year 2022, OGE proactively posted more than 250 pages of responsive records on its website.

OGE also continued to conduct regular self-assessments of its FOIA processing procedures and response templates and, when appropriate, make changes to increase efficiency, improve search processes, increase transparency, and otherwise improve the operation of OGE's FOIA program. In fiscal year 2022, OGE received 120 FOIA requests, a 36 percent (36%) increase over fiscal year 2021, and responded to 125 requests.

Strategic Objective 4.2: Reach a broader array of stakeholders

In fiscal year 2022, OGE proactively engaged stakeholders on critical ethics issues. OGE provided relevant, understandable information through effective communication channels, such as its website, collaborated with a broad array of stakeholders, and timely

responded to requests for information and assistance. Key highlights of OGE's work are described below.

Conducted Proactive Stakeholder Engagement

In fiscal year 2022, OGE proactively engaged with a variety of stakeholders, including ethics officials, NGOs and advocacy groups, and private citizens. Notably, OGE frequently engaged with ethics officials on draft advisories as part of its regulatory review and paperwork reduction act process. OGE also [invited comments](#) from stakeholders related to a proposed regulation on legal expense funds and received thousands of comments that OGE considered and plans to respond to in the next phase of the rulemaking process.

Created communications that are accurate, compelling, relevant, and tailored to each target audience

In order to enhance public confidence in the impartiality of government decision-making, OGE worked to communicate effectively about the ethics program by creating communications that were accurate, compelling, relevant, tailored to each targeted audience, and delivered through effective communication channels. For example, using social media, including Twitter, YouTube, and LinkedIn, OGE created 250 posts in fiscal year 2022 to help the public understand the structure of the ethics program, learn how to access various ethics documents, and contribute to government accountability. To better assist the press, OGE also updated its frequently asked press questions.

In fiscal year 2022, OGE published 12 Leadership Notes to reach federal employees and the public, highlighting important issues to the community, such as [equity](#), [public financial disclosure](#), and more. These Notes were regularly highlighted in media that reaches federal employees. Finally, in fiscal year 2022, to enhance the usefulness of its robust collection of legal documents, OGE updated the [Legal Research Search Collection](#) by modifying text accompanying the option to search within the documents in the collection and by adding a new set of search tips to provide descriptions of the search collection's functionality.

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of page views of web pages targeted to the public on OGE's website (916,000), as well as OGE's Twitter engagement rate (1.5%).

Collaborated with and engaged a broad array of stakeholders

Ethics in government is a shared concern across all segments of society. OGE sees value in participating in forums where diverse stakeholders can openly discuss ideas and share information to help inform OGE's efforts. To share information and foster valuable collaboration, OGE continued to participate as a member of private sector, state, and local ethics organizations, such as the Council on Governmental Ethics Laws (COGEL), in addition to federal interagency groups. In addition, in fiscal year 2022, OGE implemented new strategies to reach a broader array of stakeholders. These strategies included reaching out to 50 regional media outlets and holding 11 information sessions for advocacy and non-profit groups.



Responded timely to external requests for information and assistance

OGE responded to a large volume of requests for information and assistance from its external stakeholders on topics such as conflicts of interest, enforcement, public financial disclosure, gifts from outside sources, and post-employment.

In fiscal year 2022, OGE responded to approximately 90 requests for assistance from the press to support more accurate reporting about the ethics laws and regulations and OGE's work. These interactions multiplied 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 more than 570 requests from private citizens. This engagement promoted understanding of the executive branch ethics program and related ethics laws and regulations.

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of requests from external stakeholders. In fiscal year 2022, OGE received approximately 700 requests from non-government, external stakeholders. This coverage helped the public understand the framework for government ethics in the executive branch.

Participated and collaborated with ethics practitioners across various segments of society

OGE continues to participate as a member of private sector, state, and local ethics organizations such as [COGEL](#), in addition to federal interagency groups, such as the Small Agency Council. Through meetings, presentations, and online forums, OGE continues to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. OGE also conducts outreach and participates with organizations that share common interests related to OGE’s mission, such as the [Partnership for Public Service](#). For example, OGE provided technical assistance to the Partnership for Public Service on a survey they conduct about public perceptions of the federal government and its employees.

Performance Indicator: An indicator of OGE’s success is expanding its outreach efforts conducted during the fiscal year. OGE conducted 12 outreach activities during the fiscal year.



Crosscutting Objective

Crosscutting Objective 5.1: Advance equity in OGE's programs and improve diversity, equity, inclusion, and accessibility in OGE's operations.

Advance equity in OGE's programs

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

Delivery of Ethics Education

Access to Key Ethics Records

OGE's Equity Efforts



OGE has determined that it can most effectively advance equity and remove barriers for underserved communities in three key program areas: (1) ethics education, (2) release of ethics records, and (3) procurement. As described throughout this document, OGE plans to undertake, or has already implemented, a variety of actions to further equity among federal employees, the general public, members of the greater executive branch ethics community, and disadvantaged businesses.

Improve diversity, equity, inclusion, and accessibility in OGE's operations



In fiscal year 2022, OGE finalized and began to implement its DEIA Strategic Plan, reflecting its whole-of-agency approach to advancing DEIA. Developed by a cross-divisional team of employees at a variety of levels, OGE began its efforts to increase leadership engagement, improve its hiring practices, review its professional development programs, and improve workplace accessibility and safety.

As part of this effort, OGE provided DEIA and unconscious bias training to all OGE employees, as well as training to supervisors on reasonable accommodation. OGE also surveyed staff about OGE's DEIA efforts and developed several related policies on religious accommodations, and domestic violence, sexual assault, and stalking.

Lastly, OGE also made significant progress on its government-wide DEIA initiative related to improving access to professional development for ethics officials. See page 12 for more information.

Milestone: OGE met its milestone to implement its Equity Action Plan and DEIA Strategic Plan.

Fiscal Year 2022 Stewardship

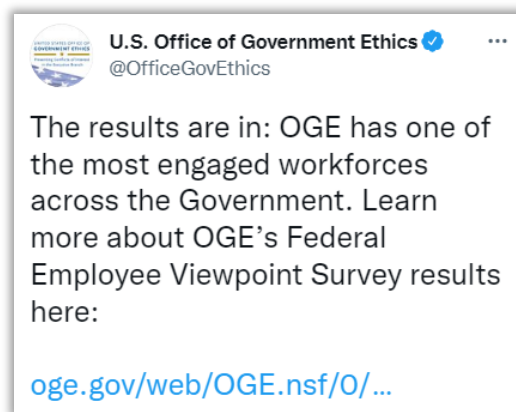
To effectively lead in ethics, OGE must be an excellent steward of the resources entrusted to it to carry out its critical mission of preventing conflicts of interests in the executive branch. OGE endeavors to be a model agency with regard to its workforce, technology, and compliance. Specifically, OGE invests in the development, diversity, and retention of its most valuable asset: its staff, who work tirelessly to accomplish the agency's vital mission. OGE leverages technology to amplify its impact by increasing the reach of its limited resources. OGE also strives to maximize every taxpayer dollar provided to the agency and to remain compliant with the wide array of requirements applicable to federal agencies.

In support of its mission and strategic goals, OGE has developed three stewardship objectives: (6.1) Sustain a high-performing, cross-functional staff; (6.2) Leverage technology to increase efficiency and effectiveness; and (6.3) Safeguard the government resources entrusted to OGE.

Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. OGE's continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities.

Accountability and Performance: In fiscal year 2022, OGE continued to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; reviewing the Employee Viewpoint Survey results, and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.



Employee Recognition and Inclusion: In fiscal year 2022, OGE continued to recognize employees through its awards program, which includes spot awards and year-end performance bonuses. In addition, OGE continued its staff-run Employee

Recognition Group, which provides management with new, non-monetary ways to recognize staff based on employee input. OGE also took a wide variety of additional steps to create collaboration, inclusion, and recognition among its staff. For example, OGE held

regular special emphasis program meetings in fiscal year 2022, which were open to OGE's entire staff and included numerous speakers from federal and local communities. In fiscal year 2022, OGE also began facilitating virtual breakrooms for staff twice every week and continued to hold its annual employee recognition event.

Hiring: OGE hired and onboarded four employees. In direct support of its DEIA Strategic Plan, prior to these recruitment efforts, OGE reviewed its hiring practices and updated its procedures against evidenced-based best practices to identify and then implement improvements (See page 33 for more information on OGE's efforts toward advancing equity). For example, OGE updated its "[career](#)" webpage and vacancy announcements with inclusive language promoting DEIA values, posted vacancy announcements more widely to reach more diverse applicants, redacted applicant resumes, provided unconscious bias training to hiring panel participants, and conducted structured interviews.

Workforce Development: OGE continually focuses on developing the knowledge, skills, and abilities of its employees through personalized formal and informal professional development opportunities. In fiscal year 2022, all OGE employees participated in the OGE Employee Development Plan (EDP) program. Through the EDP process, employees, in collaboration with their supervisors, identify specific formal training, mentoring, self-study, and/or on-the-job training activities that they will complete in the covered period. Employees have the opportunity to lead significant projects, as well as participate in cross-functional teams and training. Notably, the EDP identifies objective measures for assessing the employee's acquisition of the targeted knowledge or skills. Lastly, as part of its DEIA initiative, OGE began to examine its EDP program as part of its commitment to create more uniformity and better serve employees who are members of underserved communities.

Performance Goal: OGE exceeded its target for its employee engagement index score on the Employee Viewpoint Survey. Target: 80% | Actual: 84%

Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness

OGE leverages technology to increase its efficiency and effectiveness in all aspects of its work. Without strong, secure information systems and processes, the agency cannot carry out its executive branchwide mandates, operate effectively, or efficiently perform its mission-critical activities.

Maintained and refined OGE's website

OGE's website is the agency's main communication tool and the most valuable resource for OGE's stakeholders, including agency ethics officials, the media, and the general public. OGE continued to maintain and refine its website, which OGE redesigned in fiscal year 2020, in conformance with the IDEA Act. In fiscal year 2022, OGE implemented several changes to improve the user experience. For example, OGE added search tips as well as short videos to further explain how to maximize the search/capabilities of the legal research collection. In direct support of its equity initiative, OGE focused on improving the pages that describe the ethics document release process by providing more information in a Q&A format and using plain language to describe the documents available.



Enhanced the functionality of information technology tools, resources, and systems

In fiscal year 2022, OGE developed and launched a redesigned agency intranet, in conformance with the IDEA Act, which includes IT resources, forms, standard operating procedures, HR resources, and information for employees about ethics at OGE. This critical tool facilitates OGE's ability to review and update key employee content, provide consistent and frequent communication for employees, improve the agency's performance and efficiency, create more cohesion and uniformity in the hybrid work environment, and support onboarding of new staff.



Milestone: OGE did not complete its milestone to complete procurement of equipment and software for an IT refresh. OGE was unable to meet this milestone because it did not receive its full request for funding in fiscal year 2022.

OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal year 2022, OGE continued to devote resources to applications that support major mission programs, such as the Desk Officer Program, the Annual Questionnaire, the records program, and financial disclosure tracking, as well as those applications that support internal operations, such as requisition processing, budget formulation, and equipment tracking. These custom applications allow OGE to accomplish its mission with limited staff and help the agency to make data-driven decisions.

Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE

In addition to its mission work, OGE conducts its agency operations following the principle that “public service is a public trust.” OGE takes seriously its compliance with government-wide directives and their important policy objectives, including OGE carefully safeguarding the government resources entrusted to the agency.

Fiscal stewardship: OGE continued to be an excellent fiscal steward of the resources entrusted to it. OGE demonstrated its commitment to effectively and efficiently managing funds appropriated by Congress to execute OGE mission goals, including through maximizing its use of 22 shared services and interagency agreements. Not only does OGE continually seek full value from each taxpayer dollar, it does so while implementing strong fiscal controls. Notably, in fiscal year 2022, OGE maintained an unmodified opinion on its financial statements and an independent financial audit found no material internal control weaknesses.

To reduce fiscal risk and ensure that OGE remains fiscally responsible, OGE continued to use a custom internal application, which builds in additional internal controls and tracking, to maintain its effective process for approving requisitions. OGE also continued to maintain strong internal controls regarding its inventory of IT equipment and other assets. Similarly, in fiscal year 2022, OGE developed and refined custom applications to strengthen its budget formulation and performance award approval processes.

In addition, to use OGE’s purchasing power to increase equity among the historically underserved, OGE has refined its procurement practices, procedures, and tracking to ensure a significant percentage of its purchases (98% of contracts awarded and 25% of micro purchases) are made from disadvantaged businesses. This is 63 percent points higher for contracts and 14 percent points higher for micro purchases than the Administrations goals of 35 and 11 respectively for this year.

Performance Goal: OGE met its performance goal of receiving an unqualified opinion on its annual financial report from an independent auditor.

Cybersecurity: In accordance with the Federal Information Security Modernization Act (FISMA), OGE’s security program continued to review weekly network perimeter scans performed by the Department of Homeland Security; conduct and review monthly scans of the internal OGE network; procure and undergo annual security assessment reviews conducted by accredited independent auditors using FISMA CIO and FISMA IG metrics; provide mandatory annual cybersecurity awareness training; and prepare for *INTEGRITY*’s annual security assessment. In fiscal year 2022, OGE also took steps to comply with Executive Order 14028 on Improving the Nation’s Cybersecurity and subsequent guidance. This work is critical to protect the confidentiality, integrity, and availability of OGE’s information and information systems against unauthorized access and use.

Performance Goal: OGE met its performance goal of “managing risk” for the majority of categories on the Cybersecurity Risk Management Assessment.

Compliance: OGE continued to strive to remain compliant with the wide array of requirements applicable to federal agencies. Key highlights of OGE’s work are described below.

Data: OGE continued to ensure the agency’s compliance with the Foundations for Evidence-Based Policymaking Act, to convene monthly meetings of its Data Governance Board, and to actively participate in the Chief Data Officers Council. In fiscal year 2022, OGE expanded its data activities by building data governance for key applications, conducting a skills gap analysis to identify staff in need of data skills training, conducting an agencywide assessment of data sets that may be of interest to the public/stakeholders, and prioritizing the use of data in its decision making. For example, OGE launched a comprehensive process to make more data-driven decisions in determining which ethics issues would benefit from a written legal advisory.

Privacy: In fiscal year 2022, OGE continued to safeguard privacy by maintaining critical executive branch-wide systems of records related to the ethics program, including *INTEGRITY*, as well as the agency’s internal records. OGE’s privacy program worked to ensure that the agency complies with the requirements of the Privacy Act, the E-Government Act, and the executive branch privacy program requirements, as established by OMB. During fiscal year 2022, the Privacy Team reviewed 22 Privacy Threshold Analyses, issued one new and revised four System of Records Notices, and revised one and issued four new Privacy Impact Analyses. The Team also revised the agency’s Breach Policy and conducted privacy training and role-based privacy training to 100 percent of those required to receive it, including agency employees and supervisors, and government contractors who perform services for the agency.

Records: OGE continued to enhance its records management program in order to ensure agency records are available to the public and OGE staff, and to comply with records management requirements. In fiscal year 2022, this work included: developing and updating records management policies and procedures; developing and conducting training, and onboarding new employees; working with the National Archives and Records Administration (NARA) on OGE mission-specific disposition authorities; issuing records management guidance; conducting inventories of agency records systems and repositories; and updating records file plans. Notably, OGE timely submitted three program assessments to NARA and received high scores on each report. NARA placed OGE’s records program in the “low risk category.”

Performance Goal: OGE met its goal for the number of employees that took required training (i.e., records management, cybersecurity, privacy, and ethics training). Target: 90% | Actual: 99%