STRATEGIC
PLAN
FISCAL YEARS 2001-2006

September 2000

Introduction

The Ethics in Government Act states that the Office of Government Ethics is responsible for providing "overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive agency." Over time, the responsibilities of the Office have expanded by statute and Executive order to include providing interpretive guidance on, and administrative support for a number of additional requirements related to employee conduct. These functions comprise the ethics program of the executive branch.

At its heart, the purpose of the executive branch ethics program is to ensure that executive branch decisions are neither tainted by nor appear to be tainted by any question of conflicts of interest on the part of the employees involved in the decisions. Because the integrity of decision-making is fundamental to every Government program, the head of each agency has primary responsibility for the day-to-day administration of the ethics program for the employees who carry out the substantive programs of that agency. Each agency head, however, selects an individual employee of that agency to serve as that agency's Designated Agency Ethics Official (DAEO). These DAEOs and the additional staff of each agency who support an agency's ethics program are the individuals with whom OGE primarily interacts.

In carrying out the mission and achieving the goals and objectives set forth in the six-year strategic plan that follows, OGE will, as it has in the past, continue to rely primarily upon skilled and diverse human resources—those of its own and those within each agency who are tasked with carrying out that agency's ethics program. In addition to human resources, new technologies have provided additional opportunities to support the program, and, in order to take advantage of those, funding is and will be necessary in the future to acquire, through contract, the technical support necessary to adapt those technologies to the needs of the ethics program.

Thus, a successful executive branch ethics program necessitates the complementary use of talents and resources of all the offices within OGE and the agency ethics programs combined with the support of the program at the highest levels. This is reflected in the Goals and Objectives. To ensure knowledge and understanding of the Goals and Objectives that are set forth in this Plan and later the measures of the performance plan by which success will be judged, all OGE program managers participated personally and substantially in the development of these goals and objectives and will continue to do so in all subsequent performance plans. While personnel resources throughout the agency can be called upon to support any program element, the office or offices within OGE which are primarily responsible for carrying out portions of the plan are noted by code.

- ■ Office of the Director (OD)
- ■ Office of General Counsel and Legal Policy (OGC/LP)
- ■ Office of Agency Programs (OAP)
- ■ Office of Information Resource Management (OIRM)

Mission

The Office of Government Ethics exercises leadership in the executive branch to prevent conflicts of interest on the part of Government employees, and to resolve those conflicts of interest that do occur. In partnership with executive branch agencies and departments, we foster high ethical standards for employees and strengthen the public's confidence that the Government's business is conducted with impartiality and integrity.

Goals and Objectives

Goal I. OGE will provide overall policy direction to the executive branch ethics program.

Objective 1. Develop, evaluate, and promote ethics policies for employee conduct to protect executive branch processes from conflicts of interest, as well as from appearances of conflicts of interest. Ensure that these policies are consistent, reasonable, and understandable to employees.

Objective 2. Serve as the primary authoritative source of Federal executive branch ethics policy.

Objective 3. Solicit the advice of agency ethics officials in policy-making processes.

An annual performance plan that will support this goal and these objectives will focus on:

■ how often OGE's advice was sought and incorporated by OMB in its legislative and policy review functions for the executive branch; (OD, OGC/LP)

■ how often OGE sought to identify, with consultation with ethics officials, with enforcement entities such as the Inspector General or DOJ, or with the White House or Congress, an ethics policy that needed to be developed or amended either by statute, regulation, or otherwise, and whether appropriate steps were taken to formulate that policy; (OD, OGC/LP)

■ how often OGE formally proposed statutory amendments in response to needed changes that were given Administration backing for transmittal to Congress for action and the number enacted; (OD, OGC/LP)

■ how often U.S. foreign policy agencies sought OGE technical assistance as a source of U.S. Federal ethics policy in support of the U.S. efforts at encouraging anti-corruption measures throughout the world, how that assistance was received and whether the requests were repeated. (OD)

Key external factors that could affect achievement of the general goals and objectives include:

■ the consent of Congress for legislative changes, which may be particularly difficult when proposed legislation applies equally to officers and employees of both branches;

■ an intra-branch clearance process for regulatory changes, the timing of which OGE does not control;

■ political considerations unrelated to ethics policy that may overrule OGE's proposals;

■ specific agency program interests that are inconsistent with executive branchwide solutions and that undermine a general consensus on ethics policies;

■ misunderstandings of the role of OGE and its programs contained in widely-circulated news media accounts.

Goal II. OGE will support the President, executive branch agency heads and employees in administering effective, fair, and consistent ethics programs within the branch and individual agencies.

Objective 1. Provide evaluations of agency ethics programs to agency heads and ethics officials which identify strengths and weaknesses of the program. Make specific recommendations for program enhancement designed to help ensure integrity in Government operations.

Objective 2. Provide timely and accurate written and oral opinions and be available for informal consultations concerning matters involving the application of the standards of ethical conduct, criminal conflict of interest statutes, and other related statutes and regulations.

Objective 3. Provide technical assistance to agencies in order to implement well-run and employee-helpful agency ethics programs.

Objective 4. Provide expert review and conflict of interest analysis of the nominee, annual and termination financial disclosure reports filed by Presidential appointees requiring Senate confirmation to assist agencies in providing appropriate advice on and taking appropriate actions to prevent financial conflicts of interest by those appointees. Evaluate follow-up by agencies and officials regarding ethics commitments made by nominees during the confirmation process.

Objective 5. Promote the importance of the ethics program to department and agency heads and other Government officials in order to secure personal commitment and sufficient agency resources.

Objective 6. Provide professional enhancement opportunities and utilize appropriate Governmentwide personnel program innovations for OGE staff in order to attract and retain highly qualified and effective human resources necessary to support this goal.

Objective 7. Enhance Federal customer service by fully integrating information technology (IT) into the mission planning and business processes of the agency so as to reduce costs, improve effectiveness, and provide greater reliability and efficiency in the collection, maintenance, and dissemination of ethics program information.

The annual performance plan that will support this goal and these objectives will set forth:

■ the number of agency ethics programs to be reviewed to meet a four-year cycle and a percentage of restructuring recommendations implemented; (OAP)

■ numbers of ethics agreements documented as adequately completed within the time frame established during Senate confirmation; (OAP)

■ continuing review of new technology to determine if it can be adapted to assist with carrying out elements of an OGE or agency ethics program and, once identified, a schedule to develop its use; (OIRM, OAP)

■ schedule for developing full electronic completion and electronic filing for public and confidential financial disclosure forms; (OIRM, OAP)

■ number of contacts handled by desk officers providing daily advice to the agencies and adequacy of advice; (OAP)

■ number of contacts handled by the legal staff in providing oral and written statutory or regulatory interpretations and adequacy of interpretations; (OGC/LP)

■ number of timely responses sent to agencies concerning exemptions, waivers, late filing fees, and other administrative matters; (OAP)

■ guidance developed by the Director for when meetings should occur, the number of meetings sought with Congress, White House officials, OMB, and the heads of agencies where the purpose is to encourage support for the ethics program; (OD)

■ number of nominee, annual and termination financial disclosure statements reviewed and certified on a timely basis; (OGC/LP, OAP)

■ a schedule to assess the training needs of the workforce and identify appropriate training; (agency-wide)

■ a commitment to provide employees with a work environment, support, guidance and resources necessary to enable them to carry out their responsibilities; (agency-wide)

■ a schedule for regular updates of the Ethics CD Rom and OGE Web site; (OAP, OIRM)

■ a schedule for developing an OGE inter-agency "extranet" that will provide a secure, cost effective, efficient, easy to use, method for collecting and disseminating ethics program information; (OAP, OIRM)

■ a plan and schedule for implementing optional electronic transactions, where practical, in accordance with final government-wide guidance on the Government Paperwork Elimination Act. (OGC/LP, OIRM)

Key external factors which could affect our achievement of this general goal and these objectives are:

■ reduced funds to support human resource needs;

■ the lack of personnel time and funds to make use of available technology;

■ the lack of adequate staff, structure, resources or leadership within agencies to carry out their own program or implement OGE recommendations;

■ changes to current information technology;

■ new information technology related legislation or Administration initiatives; and

■ technological incompatibilities that impede inter-agency cross servicing arrangements.

Goal III. OGE will develop and make available to agencies innovative training and ethics education materials and promote and provide quality education and training experiences for agency ethics officials and employees.

Objective 1. Provide quality education and training courses for agency ethics officials.

Objective 2. Provide accurate, consistent, beneficial and cost effective materials for agencies to use in their ethics education and training programs for employees.

Objective 3. Fully integrate information technology into the education and training environment to increase our ability to provide information and educational opportunities for the executive branch ethics community, employees and the public.

The annual performance plan that will support this goal and these objectives will set forth:

■ a schedule to be followed to identify the most relevant topics to be covered by ethics education courses and materials for ethics officials and employees as well as the appropriate formats for conveying those topics and the target number of courses and materials to be developed; (OAP, OGC/LP, OIRM)

■ schedules to be followed for requesting executive branch ethics officials' input and participation in large scale educational projects such as satellite broadcast or teleconference training, and development of multimedia training packages; (OAP, OIRM)

■ schedules for development and administration of the annual agency ethics program reporting requirement and identification of trends in agency ethics programs; (OAP)

■ schedules for planning, developing, and conducting an annual executive branchwide ethics conference, including new initiatives to expand offsite audiences; (OAP)

■ time frames and standards which OGE will use to evaluate the effectiveness of the ethics training courses and materials it develops for use by agencies in their ethics training programs; (OAP)

■ ongoing research and training on the latest technological products that will support OGE's ability to meet its quality education and training goal. (OAP)

Key external factors which could affect our achievement of this general goal and these objectives are:

■ reduced funds for OGE personnel and/or travel;

■ lack of funds for obtaining the technological resources necessary to offer the most cost effective materials and courses;

■ lack of funds for agency ethics personnel to carry out agency education and training objectives;

■ additional priorities forced on agency ethics officials detracting from the time spent on ethics education and training;

■ unanticipated changes in statutes or litigation which necessitate altering existing materials or courses;

■ lack of resources to assess employee comprehension of the rules governing their conduct;

■ lack of appropriate training facilities.

Goal IV. OGE will administer an effective outreach program.

Objective 1. Foster a greater appreciation on the part of the public and future employees of the fact that there is a strong ethics program for employees of the executive branch and that standards are enforced.

Objective 2. Share the programmatic and policy development experiences of OGE with other governments, non-profits, corporations, professional and trade associations and institutions of higher education who are pursuing the development or enhancement of their own educational or ethics programs.

The annual performance plan that will support this goal and these objectives will set forth:

■ target levels of the type of requests received for, or the opportunities sought by OGE to participate in meetings, conferences and courses sponsored by private organizations or submit articles to publications in order to describe and promote the executive branch ethics program; (OD)

■ a schedule to develop materials which promote public service ethics in general rather than specific rules or regulations and the number of those materials requested by and/or made available to the public; (OAP, OD)

■ a schedule for updating and tracking the volume of use of OGE's information on the World Wide Web; (OAP, OIRM)

■ criteria to evaluate responsiveness to requests for publicly available documents and information. (OGC/LP, OAP)

The key factor that could affect OGE's achievement of this goal is;

■ the amount of resources that OGE has to devote to this goal after primary emphasis is given to the other goals.

Program evaluations that were included in preparing this strategic plan included:

■ number of requests by OMB for review of legislative materials and the types of issues involved;

■ results of program evaluations of agency ethics programs over the last two years and the types of issues raised and recommendations made and adopted;

■ results of annual surveys of ethics officials filed with OGE each February covering the previous fiscal year;

■ consultations held with the Department of Justice and the Inspectors General concerning ethics issues that are not adequately being addressed by current policies;

■ results of single-issue reviews and focus group discussions of ethics issues conducted over the last three years;

■ results of informal consultations with ethics officials regarding all aspects of ethics program;

■ results of meetings held by the Director of OGE with ethics officials from cabinet-level departments;

■ customer surveys conducted by OGE concerning ethics program reviews, desk officer operations and the provision of public financial disclosures to requesters;

■ number of requests from U.S. foreign policy agencies and organizations regarding OGE participation as an information resource in anti-corruption programs.

■ results of annual needs assessments of ethics officials concerning ethics education and training materials needed;

■ evolving ethics issues raised in OGE consultations with other governments, non-profits, corporations, trade and professional associations and educational institutions; and

■ ethics program issues raised by the news media, the Congress, the White House and Federal agencies over the past year.

■ monthly OGE Website usage statistics indicating numbers of "hits" to the site and which types of information resources were consulted or downloaded.

Future program evaluations will be performed annually in March 2001, 2002, and 2003 by OGE senior staff. The program materials listed above as well as performance measures developed will be considered in these annual evaluations. The scope of the evaluations will include the entire executive branch ethics program as reflected in the above surveys, reports and other materials. Particular issues that OGE will focus on for the next three years include:

■ agencies' ability to manage effective ethics programs despite diminishing human resources, budget cuts, reorganizations, privatization and other government initiatives which heavily impact the program;

■ reassessment of financial disclosure and alternative systems as an effective tool to prevent financial conflicts of interest;

■ the use of current technology and learning tools which could be adapted into new and innovative methods of delivering ethics education and training;

■ evolving issues involving agencies' integration of ethics into the policy and decision-making process as employees and managers are empowered to make with less oversight more decisions that heavily impact the private sector;

■ new initiatives (such as specialized training) aimed at incoming Presidential appointees to inculcate high-level commitment to executive leadership in the ethics program; and

■ integrating information technology into executive branch ethics program.