UNITED STATES OFFICE OF
GOVERNMENT ETHICS

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Preventing Conflicts of Interest
in the Executive Branch

Fiscal Year 2016

**Explanatory Notes, Annual Performance Plan,
and Annual Performance Report**

Prepared for the Committee on Appropriations

February 2015

The United States Office of Government Ethics (OGE) provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE's mission directly supports the President's goal of responsibly governing the nation.

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UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – About OGE

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

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; oversees a financial disclosure system that reaches more than 27,000 public and more than 370,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the more than 5,000 ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and provides technical assistance to state, local, and foreign governments and international organizations.

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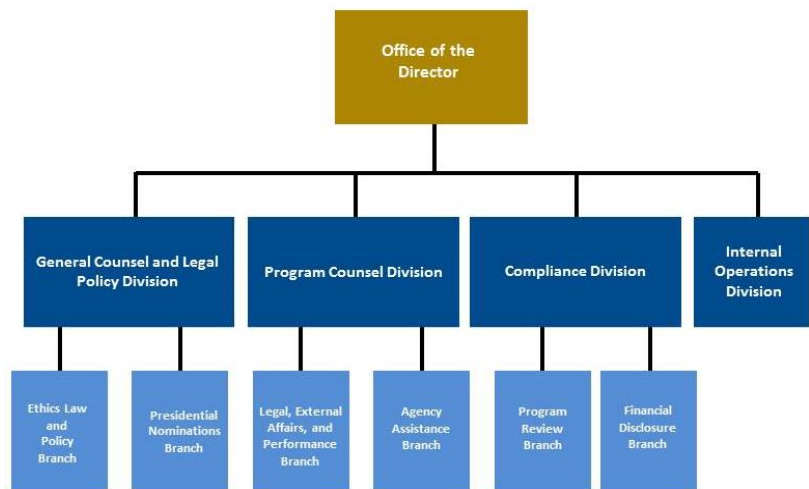

Figure 1: OGE Organizational Chart

Long-Term Strategic Goals

When government decisions are made free from conflicts of interest, the public can have greater confidence in the integrity of executive branch programs and operations. The three strategic goals of OGE's strategic plan for fiscal years 2014 through 2018 – uniformity, continuity, and transparency – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. See Figure 2. OGE's budget priorities for fiscal year 2016 support achievement of these strategic goals.

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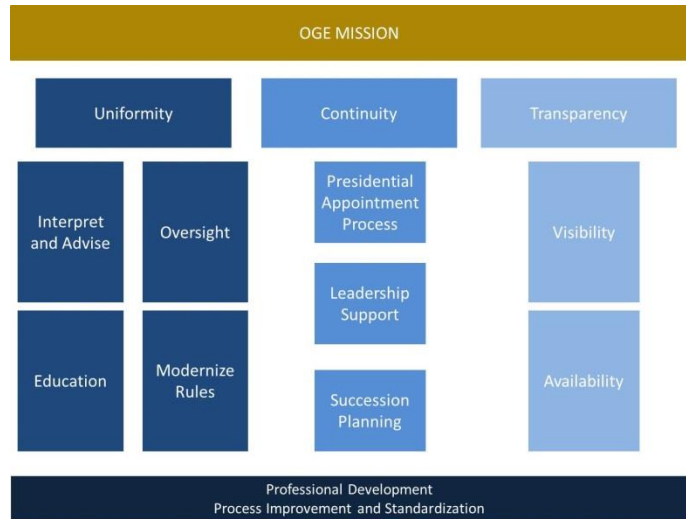

Figure 2: OGE's Fiscal Year 2014 – 2018 Strategic Plan

1. Advance a strong, uniform executive branch ethics program: OGE interprets and advises on ethics laws, policies, and program management issues; holds executive branch agencies accountable for carrying out effective ethics programs; contributes to the professional development of ethics officials; and modernizes and implements the ethics rules and regulations.

2. Contribute to the continuity of senior leadership in the executive branch: OGE provides assistance to the President and the Senate in the nomination process for Presidential appointees requiring Senate confirmation, supports succession planning in executive branch ethics programs, and promotes leadership support of the executive branch ethics program overall.

3. Promote transparency of the executive branch ethics program: OGE raises the visibility of the executive branch ethics program and ensures that ethics information is publicly available to increase public confidence in the integrity of governmental decision making.

Starting on page 6, this document describes the specific work OGE will undertake in fiscal years 2015 and 2016 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward the achievement of its strategic objectives.

Section II – Budget Request Overview

Appropriations Language

OGE proposes the following appropriations language: "For necessary expenses to carry out functions of the Office of Government Ethics pursuant to the Ethics in Government Act of 1978, the Ethics Reform Act of 1989, and the Stop Trading on Congressional Knowledge Act of 2012, including services as authorized by 5 U.S.C. 3109, rental of conference rooms in the District of Columbia and elsewhere, hire of passenger motor vehicles, and not to exceed $1,500 for official reception and representation expenses, $15,742,000."

Budget Request Overview Narrative

OGE requests $15,742,000 for fiscal year 2016 to carry out its mission-critical work. This work includes ensuring the ongoing viability of its new efiling system, *Integrity,* and hiring adequate staff to support its important role in the review of top leaders' financial holdings for conflicts of interest in the Presidential post-election period. This request represents a two percent increase over OGE's fiscal year 2015 enacted level (a less than three percent increase from fiscal year 2014 enacted funding).

At the request level of $15,742,000, OGE expects to be able to invest an additional $150,000 to carry out significant, necessary improvements to *Integrity* and to hire two additional professional staff necessary to support its Presidential nominations work at an estimated cost of $147,000. This funding request level is vital. It will enable OGE to absorb the additional demands of the Presidential election without compromising OGE's ability to perform its other mission-critical functions. These functions include providing guidance, developing rules, and promoting understanding of the ethical standards and conflict of interest laws in executive branch agencies through education programs and compliance reviews.

The additional funding for *Integrity* will enable OGE to finalize an enhanced version of the efiling system prior to the Presidential election. The upgraded version is expected to add important new functionality not included in the initial launch of the system, including system "flags," advanced analytics, and expanded ethics-related data collection and tracking. *Integrity* improves the financial disclosure process, particularly for new filers such as Presidential nominees, because its "wizard" functionality asks filers to answer a variety of questions related to their financial holdings and outside positions and then logically collects the required reporting information based on their responses to these questions. This tailored approach to collecting financial information reduces filer error, as well as eliminates filer confusion that routinely resulted from attempting to follow the complex written instructions associated with the previous paper-based OGE Form 278. *Integrity* also provides for a seamless, paperless review process and increases OGE's access to agency information in support of advancing data-driven, evidenced-based decision making. Funding an enhanced version of *Integrity* also represents OGE's investment in smarter IT delivery executive branch-wide. *Integrity* makes available across the executive branch an effective efiling system at no cost to agencies, thereby minimizing the need for agencies to expend resources on their own systems. This furthers a President's Management Agenda goal of reducing duplication, fragmentation, and overlap. It

also creates the potential for agencies to achieve cost savings that they may redeploy to fund other key ethics mission work. OGE's request would result in this important investment.

In addition to administering an effective efiling system, OGE requires the requested resources to hire and prepare OGE's staff and agency ethics officials across government for their vital role in the Presidential transition. A very significant increase in volume of financial disclosure filings by Presidential nominees requiring Senate confirmation (PAS nominees) will occur in fiscal year 2017 and beyond, following the 2016 Presidential election. When leadership is transferred during a Presidential transition, the nation is vulnerable to a variety of risks, including risks associated with national security and natural disasters. For this reason, the efficient processing of Presidential nominations is critical in order to expeditiously fill vacant positions. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest. Moreover, due to the volume of positions that change during this post-election period, OGE's workload is expected to triple with the election of a new Administration in 2016. OGE's fiscal year 2016 request includes $147,000 to hire two additional professional ethics staff to cross-functionally support these efforts. OGE uses a matrix approach to staffing the nominee report review program, particularly during peak workload periods, to ensure both short-term capacity for its critical PAS nominee work in the post-election period and long-term support for OGE's core mission work. OGE will hire the staff in key mission areas, specifically compliance and agency support, and cross-train the staff. OGE will need the new professional staff on board in 2016 to provide them extensive nominee financial disclosure review training, as well as hands-on experiential learning through assignments of nominee financial disclosure reports.

OGE will also need this full complement of staff resources to support executive branch agency ethics officials in their own preparation for the post-election period. Specifically, OGE will conduct training for nominee financial disclosure reviewers at agencies throughout the executive branch and enhance its programs to provide legal guidance and training to executive branch agencies regarding restrictions on seeking employment and post-government employment activities.

An effective executive branch ethics program helps ensure that government decisions are made free from conflicts of interest, providing the public greater confidence in the integrity of executive branch programs and operations. OGE requires the requested $15,742,000 in order to continue to effectively oversee the executive branch ethics program while absorbing the significant additional workload that will be generated by the upcoming Presidential election.

Budget Object Class Table

A. Budget Request By Object Classification

The object classification table set forth below summarizes OGE's request.

Table: Budget Request by Object Classification in Thousands of Dollars (000's)

	Object Class	2014 Enacted	2015 Enacted	2016 Requested
11.1	Salaries	$8,605	$8,517	$8,747[a]
12.1	Benefits	$2,310	$2,394	$2,450
21.0	Travel	$20	$32	$21
22.0	Transportation (Freight)	$6	$6	$6
23.1	Rental Payments to GSA	$1,691	$1,252	$1,450[b]
23.2	Rental Payments to Others	$0	$0	$0
23.3	Communications and Utilities	$127	$129	$121
24.0	Printing and Reproduction	$11	$10	$65[c]
25.2	Other Services	$2,206	$2,317	$2,715[d]
26.0	Supplies and Materials	$105	$109	$115
31.0	Equipment	$244	$654	$52[e]
99.0	Subtotal	$15,325	$15,420	$15,742
99.0	Reimbursable	$725	$725	$725
99.0	Totals	$16,050	$16,145	$16,467

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[a] Supports hiring two additional professional staff to support OGE's vital role in the review of top leaders' financial holdings in the Presidential post-election period and OGE's other mission-critical work.

[b] Reflects GSA-mandated reduction in OGE office square footage and the terms of the new 10-year lease signed in fiscal year 2014.

[c] Reflects actual Government Printing Office costs after reviewing historical expenses; also includes necessary increases in printing and reproduction of training and reference materials for OGE's role in the 2016 Presidential transition.

[d] Supports the development and launch of a revised version of *Integrity*, OGE's executive branch-wide electronic public financial disclosure system mandated by the STOCK Act.

[e] Reflects complete, successful replacement of agency-wide information technology equipment, including network servers, updated phone system, and HVAC system during fiscal years 2014 and 2015 resulting in significant reduction of funding necessary for equipment in fiscal year 2016. Increased funding necessary to maintain and support the equipment is reflected in Object Class 2500 and 2600.

Section III – Fiscal Year 2014 Performance Report and Fiscal Year 2015 and 2016 Performance Plan

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

Organized by strategic goal and objective, this section highlights both OGE's major accomplishments and progress toward achieving its strategic objectives in fiscal year 2014 as measured by its performance goals.[1] This section also describes OGE's planned work for fiscal years 2015 and 2016. Information on how OGE will measure its progress toward achieving its strategic goals in fiscal year 2016 can be found in Appendix A.

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

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

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

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

Performance Highlights

Assisted and supported agency ethics officials through OGE's Desk Officer program

OGE is the supervising ethics office for a decentralized ethics community comprised of thousands of ethics officials in over 130 agencies across the executive branch. OGE's Desk Officer program serves as a vital communications link to this ethics community. OGE's Desk Officers provide agencies with assistance in resolving difficult ethics issues requiring expertise that only the supervising ethics office can offer. In fiscal year 2014, OGE Desk Officers

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

responded to over 1,843 requests for assistance. They also proactively addressed the real-time needs of agency ethics officials. For example, when the government reopened following the closure due to a lapse in appropriations early in fiscal year 2014, OGE Desk Officers proactively contacted their assigned agencies to provide guidance on specific ethics issues related to the shutdown and reopening.

In order to augment OGE's assistance to agency ethics officials and strengthen relationships with them, OGE Desk Officers visited 41 agency ethics offices in fiscal year 2014. These onsite visits served to increase agency ethics officials' awareness of the availability of OGE's services. They also bolstered agency officials' confidence in the Desk Officers' expertise, thereby encouraging agencies to make full use of the services that OGE offers.

Also in fiscal year 2014, OGE continued to leverage technology and data to enhance the effectiveness of the Desk Officer program and OGE's support to agencies. Specifically, OGE used its Agency Information Management System (AIMS) to identify trends and emerging issues in government ethics. AIMS enabled OGE to track its external interactions based on the substance, complexity and type of questions OGE received from agencies and other stakeholders, such as the public, the media, and Congress. OGE's analysis of this data shaped its guidance and education efforts. For example, OGE determined that a high percentage of the complex questions it received related to 18 U.S.C. § 205, a criminal conflict of interest statute barring government employees from certain representational activities involving the United States. In response to this data, OGE added a session to its September 2014 National Government Ethics Summit that provided an in-depth review and discussion of the statute. Based on feedback from the session, 94 percent of surveyed ethics officials improved their understanding of and were better able to provide their agency's employees with quality advice on this criminal law.

Performance Goal: OGE used direct input from the government ethics community to measure the performance of its Desk Officer program in fiscal year 2014. OGE surveyed ethics officials who had requested assistance from OGE's Desk Officers during the fiscal year. Approximately 93 percent of survey respondents indicated that Desk Officers helped them to perform their job duties. Figure 3 shows that OGE exceeded its target.

% of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties

	2014
☐ Target	80%
▆ Actual	93%
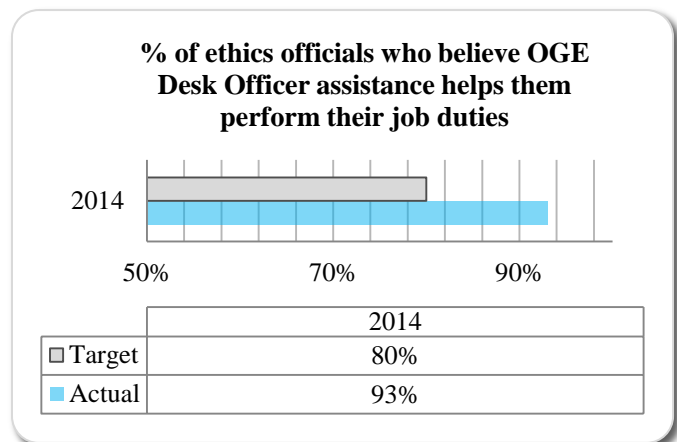
Figure 3: Desk Officer Assistance

Provided agencies with important legal and program guidance

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

In fiscal year 2014, OGE issued eight advisories covering applicability of ethics laws and regulations during furlough periods, participation in initial public offerings by certain federal employees, waivers of financial conflicts of interest, statutory pay thresholds for public financial disclosure, procedures for financial disclosure, agency component designations pertaining to revolving door restrictions, OGE's annual survey of criminal conflict of interest prosecutions, and amendments to the widely attended gathering gift exception for gifts of free attendance.

In fiscal year 2014, OGE modified its process for developing advisories on legal issues in order to leverage the expertise of the ethics community. OGE initiated consultations with key members of the ethics community to solicit their views on the subjects of planned advisories and to obtain their feedback on drafts of advisories. OGE convened focus groups to discuss the subjects addressed in several of the advisories it issued this year and circulated drafts of the advisories to ethics officials with the greatest experience in the matters addressed in the advisories. With this community input, OGE has increased its ability to effectively address current issues confronting executive branch ethics officials.

Leveraged technology to disseminate information widely

To strengthen OGE's relationship with the ethics community and to further ensure that ethics officials have access to the most up-to-date ethics resources, OGE continued to expand its efforts to timely disseminate information to the ethics community. OGE used the MAX.gov platform, a government-wide collaboration, data collection, and information sharing site, to provide relevant and timely information to ethics officials. Through MAX.gov, OGE provided advance notice of upcoming OGE guidance and events, as well as updates on relevant ethics-related legislative proposals. In addition, OGE used an ethics email listserv and its website to provide information to the ethics community.

Performance Goal: In fiscal year 2014, OGE created a new performance goal to determine if its advisories assist ethics officials in performing their jobs. An OGE survey of the ethics community found that 87 percent of respondents felt that advisories help them perform their job duties. Analytics of OGE's website also show that the legal advisories page was the third most viewed page of OGE's website.

Engaged ethics officials to share information and shape policy

In fiscal year 2014, OGE increased its engagement with the ethics community to address new and ongoing ethics issues. To support this effort, OGE organized numerous meetings, conference calls, focus groups, and webinars with senior executive branch ethics officials. These events helped strengthen OGE's relationships with the individuals who carry out the executive branch ethics program. They also provided opportunities for ethics officials to engage with OGE on a variety of topics of interest, to share with OGE lessons learned from their experiences practicing in the field, and to learn from one another.

For example, OGE's Director held quarterly meetings for groups of as many as 100 agency ethics officials. At these meetings, OGE's senior leaders shared information critical to managing an effective ethics program, encouraged discussion of current ethics issues facing

the executive branch, and consulted with agency ethics officials regarding contemplated changes in OGE's policies. For their part, agency ethics officials attending these meetings shared with OGE information about their priorities and needs, which led OGE to adjust various activities in order to provide more effective support to the executive branch ethics community. In response to OGE's annual survey of ethics officials, 96 percent of surveyed ethics officials indicated that they felt more informed as a result of attending the quarterly meetings.

OGE also held meetings of targeted groups of ethics officials to address emerging ethics issues. For example, OGE held a meeting for Designated Agency Ethics Officials (DAEOs) of large agencies who were encountering challenges in addressing compliance with the periodic transaction reporting requirement under the Stop Trading on Congressional Knowledge Act (STOCK Act). Meeting participants collaborated to develop practical approaches to implementing the STOCK Act requirement in order to foster consistent, timely compliance by covered filers. OGE held a similar meeting to address an increased volume of agency inquiries about requirements for compliance with ethics agreements through the establishment of screening arrangements. As a result of that meeting, OGE incorporated feedback from agency ethics officials into a legal advisory updating previous OGE guidance on the use of screening arrangements to comply with ethics agreements.

Performance Goal: Figure 4 shows that OGE did not reach its target goal for the percentage of ethics officials who believe OGE timely addresses new ethics issues. This may be a result of OGE broadening its focus to the question of whether ethics officials believe OGE is timely communicating on all issues, not just new or emerging issues. OGE found that 94 percent of respondents to the Annual Survey of Ethics Officials believe OGE timely communicates ethics-related information.
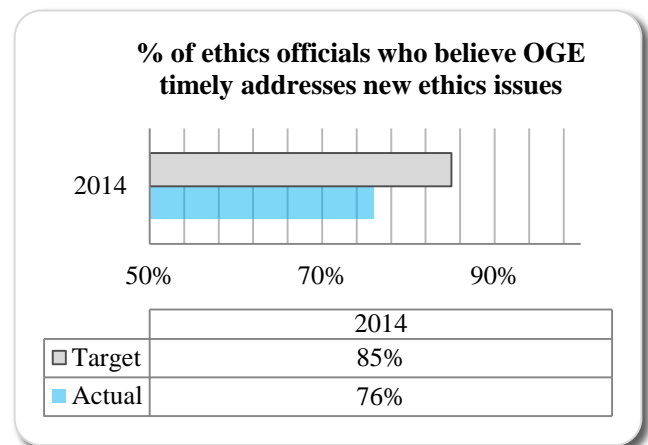
% of ethics officials who believe OGE timely addresses new ethics issues

	2014
☐ Target	85%
■ Actual	76%

Figure 4: Timely Address New Ethics Issues

Assisted other key stakeholders

In addition to assisting executive branch ethics officials, OGE responded to requests for assistance from key stakeholders. One such important OGE stakeholder is Congress. OGE serves as the legislative liaison on behalf of the entire executive branch ethics program. As such, OGE helps to build congressional understanding of the executive branch ethics program, which in turn, serves to inform congressional oversight and any future revisions to ethics laws. Notably, OGE responded to nearly 20 congressional requests for detailed, technical assistance on executive branch ethics issues and draft legislation on topics including the STOCK Act and its amendments, financial disclosure reporting requirements, gifts, and misuse of government positions and resources. Additionally, OGE provided requested support to the Government Accountability Office on two of its substantive reviews, both of which required OGE's expertise regarding the application of the executive branch ethics rules. OGE also represented the executive branch ethics community by providing ethics expertise on 38 requests for comments

on legislative materials and 36 requests for comments on Executive Orders and Presidential Memoranda from the Office of Management and Budget (OMB) through the Legislative Referral Memorandum (LRM) process. OGE timely responded to 100 percent of the LRM requests it received.

OGE also provides substantive assistance to outside entities such as associations, non-governmental organizations, attorneys, and private enterprises that interact with executive branch agencies and employees. For example, in fiscal year 2014, OGE notified a private sector company and the ethics officials of targeted agencies that the company's government employee discount program implicated ethics rules that prohibit employee from accepting certain gifts from outside sources. This type of assistance helps promote understanding of the ethics rules to prevent inadvertent violations.

<u>Planned Work for Fiscal Years 2015 and 2016</u>

In fiscal years 2015 and 2016, OGE will continue to provide quality Desk Officer services, timely legal and programmatic guidance, and effective assistance to key stakeholders. OGE will also continue to leverage technology to share information and to create opportunities to engage with the ethics community. Key highlights of OGE's planned work are described below.

Assist and support agency ethics officials through OGE's Desk Officer program

OGE Desk Officers will continue to meet personally with agency ethics officials in order to strengthen their professional relationships. Desk Officers also will continue to provide timely, expert advice in applying the ethics laws and regulations and the most up-to-date ethics information. OGE will use AIMS to become even more data driven in its decision making and to maximize the reach of its limited resources. For example, OGE will use AIMS data to identify particular groups of agency ethics officials that may require targeted ethics training, guidance, or other support services.

Provide timely legal and program guidance

Providing timely legal guidance is necessary to keep ethics officials up to date on current ethics issues and changes in ethics law and policy. In addition to publishing legal advisories as new ethics issues arise, OGE plans to issue a legal advisory that discusses implications of the legislative activity during the 113th Congress that is of relevance to the executive branch ethics program. OGE also plans to issue legal advisories related to the upcoming Presidential transition, with an emphasis on the post-government employment rules. Through written guidance, in-person meetings, social media, MAX.gov, and its website, OGE will also provide direction on program management issues, such as ethics program administration and financial disclosure.

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

Leveraging technology via the MAX.gov shared platform, OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date ethics information.

Specifically, OGE will use MAX.gov to provide updates and responses to frequently asked questions about *Integrity*, OGE's electronic public financial disclosure report filing system. OGE will also continue using MAX.gov to provide agencies with advance notice of upcoming OGE guidance and events as well as updates on relevant legislative proposals. In addition, OGE will continue to post advisories and other guidance in a searchable format on its website and will provide notice of new guidance via its listserv and MAX.gov.

OGE will continue to hold quarterly meetings with senior agency ethics officials. OGE will also organize additional meetings and conference calls to share information relevant to managing an effective ethics program, to discuss current ethics issues facing the executive branch, and to obtain information from stakeholders in the government ethics community.

Overall, OGE will continue to expand its efforts to consult with agency ethics officials, non-governmental organizations, academic experts, and other stakeholders when developing new policy. Specifically, OGE will continue its practice of seeking input from the ethics community as a part of the process of drafting its legal advisories. OGE will also continue to provide advice and assistance in response to requests from a variety of stakeholders in addition to those in the executive branch ethics community, such as Congress, professional associations, non-governmental organizations, academia, state and local governments, and employee groups, to build a better understanding of the executive branch ethics program.

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

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

Performance Highlights

Reviewed agency ethics programs for compliance

Through ethics program reviews — plenary reviews and inspections — OGE evaluates agency ethics programs. Where necessary, OGE provides recommendations for program improvement and suggests remedial actions to correct deficiencies. Evaluating agency ethics programs and following up on agency implementation of review recommendations helps to hold agency leadership accountable for administering compliant ethics programs. In fiscal year 2014, OGE conducted 24 reviews and published a total of 12 reports. OGE also conducted seven follow-up reviews and published six of the related reports.

> *"In closing, I note that we found the Review to be very beneficial and the OGE personnel who worked on it to be of the highest caliber of public servant, judicious and extremely helpful."*
>
> - *Agency head*

Implemented new inspection methodology

This year, OGE expanded the reach of its oversight function by supplementing plenary reviews with inspections. Inspections are targeted examinations of key elements of an agency's ethics program that are designed to identify systemic risks. As with plenary reviews, inspections often lead to constructive recommendations from OGE for mitigating program vulnerabilities. OGE will continue to conduct traditional plenary reviews. Inspections are an additional method of review that enables OGE to expand the reach of its resources to agencies it might not be able to assess through a plenary review in a given year. Because inspections focus on select program elements, adding inspections to the tools available to OGE has increased the number of agencies its staff can evaluate. Moreover, if an inspection of an agency generates data suggesting potential systemic risks, OGE may schedule the agency for a more expansive plenary review to evaluate its compliance. The expanded capacity provided by the inspection process increases OGE's onsite presence at federal agencies and, as a consequence, increases OGE's capacity to detect systemic risks before problems arise. In fiscal year 2014, OGE conducted 15 inspections, published eight inspection reports, and began drafting seven more reports.

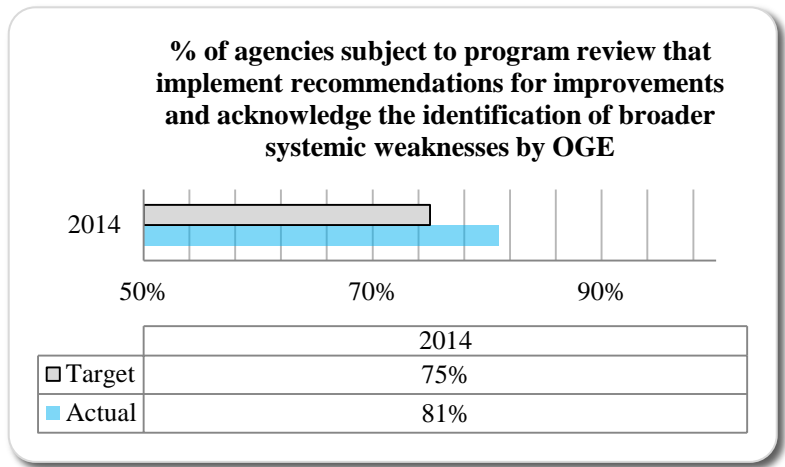*Conducted ethics program reviews*

Plenary reviews of agency ethics programs continued to be an important component of OGE's statutorily-mandated oversight activities. In fiscal year 2014, OGE conducted nine plenary reviews, published four reports, and began drafting eight more reports. OGE also conducted seven follow-up reviews and issued reports on six of those follow-up reviews. Notable among OGE's achievements in fiscal year 2014 was its increased oversight of ethics programs at a number of micro agencies. Micro agencies tend to be staffed with ethics officials who have limited time to devote to ethics-related responsibilities. By conducting program reviews of nine of these agencies in 2014, OGE was able to assess their level of compliance, assist them in correcting a number of significant deficiencies, and support them in administering effective ethics programs.

Issued recommendations to improve compliance

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation. Recommendations direct the agency to take actions necessary to correct the deficiency. In fiscal year 2014, OGE issued 58 recommendations through program reviews, both plenary reviews and inspections. For example, during a review of an agency's ethics program, OGE identified that only 87 percent of the sample of confidential reports it examined were certified timely and recommended that the agency improve the certification timeliness of confidential reports. To address this recommendation, the agency put in place a policy to alert certifiers weekly of reports that are ready for certification. As a result of this new policy, OGE found that 100 percent of a sample of confidential reports it examined during its follow-up review of the agency were certified timely. In another instance, OGE discovered that an agency was not in compliance with financial disclosure requirements. OGE issued a recommendation to the agency to collect, review, and certify reports from members of the agency's board of directors. As a result, agency ethics officials collected the reports and were

able to review board members' financial interests to ensure they could perform their duties free of conflicts of interest.

Performance Goal: OGE exceeded its target for the percent of agencies subject to program review that implemented recommendations for improvements and acknowledged the identification of broader systemic weaknesses.

% of agencies subject to program review that implement recommendations for improvements and acknowledge the identification of broader systemic weaknesses by OGE

	2014
☐ Target	75%
■ Actual	81%

Figure 5: Program Review Recommendations

Improved programs by sharing model practices

In addition to identifying ethics program deficiencies or vulnerabilities, program reviews also provide the opportunity for OGE to identify model practices that agencies have instituted to manage their ethics programs. OGE shares these model practices with other agencies to use as tools for enhancing their programs.

Analyzed program data collected from executive branch agencies

The Ethics in Government Act of 1978 requires agencies to submit to OGE information concerning certain important aspects of their programs. Agency responses to OGE information requests give OGE a snapshot view of each agency's ethics program, and the compiled data provides OGE with an overview of the entire executive branch ethics program. In fiscal year 2014, OGE collected data from each of the more than 130 executive branch agencies by administering its Annual Agency Ethics Program Questionnaire (Annual Questionnaire). OGE used the aggregate data to respond to requests about the executive branch ethics program from Congress and other stakeholders, to shape OGE's priorities, and to identify common practices used to effectively implement an agency ethics program. For example, in fiscal year 2014, OGE ascertained from questionnaire responses that 40 percent of the highest level ethics officials are currently eligible to retire. As a result, OGE plans to direct more resources toward supporting succession planning in the executive branch ethics program. See page 32. In addition, OGE reviewed agencies' questionnaire responses to increase its understanding of each ethics program and to identify any compliance concerns that might prompt an inspection or plenary review.

Published key data highlights regarding executive branch ethics program

For the first time, in fiscal year 2014 OGE shared key highlights from its Annual Questionnaire with ethics officials on the MAX.gov site and at the National Government Ethics Summit. Providing this data allowed ethics officials to compare aspects of their programs with other agencies, including how best to allocate ethics program resources. In addition, to help the public gain a better understanding of the scope and impact of the executive branch ethics

program, OGE published on its website a document containing key statistics about the executive branch-wide ethics program.

Improved data collection

Because OGE is using data from the Annual Questionnaire to inform its decisions and is more widely disseminating the data, OGE is committed to improving the quality and validity of the data it collects. In support of this effort, OGE held focus groups of ethics officials to enlist them in refining the questionnaire. Specifically, OGE sought feedback to eliminate ambiguity in the questions asked and to identify information that could be of use to OGE and to the ethics community. Based on the comments received, OGE updated the Annual Questionnaire to improve the quality and validity of the data collected. OGE issued this improved Annual Questionnaire in January 2015.

Published its annual report on the administration of the President's Ethics Pledge

To further ensure that Presidentially-appointed, Senate-confirmed (PAS) officials are free of conflicts of interest, OGE surveyed agencies in fiscal year 2014 regarding their administration of the President's Executive Order on Ethics Commitments by Executive Branch Personnel (Executive Order 13490) and issued its fifth annual report on agencies' administration of the Order. This report provides valuable insight into the administration of the Ethics Pledge required by the Order. The report includes, among other things, information about waivers of the Ethics Pledge's requirements and the percentage of PAS officials required to sign the Ethics Pledge who have done so. OGE found that during calendar year 2013, agencies successfully administered the Ethics Pledge and that all PAS officials required to sign the Ethics Pledge in 2013 had done so. OGE provided a copy of the report to Congress and made it available to the public via its website and Twitter account.

Monitored agency leaders' compliance with their ethics agreements

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

Performance Goal: In fiscal year 2014, 152 PAS appointees were subject to deadlines for documented compliance with their ethics agreements. Agency ethics officials reported that 94 percent of these appointees complied with their ethics agreements within required timeframes.

% of ethics agreements complied with within established timeframes

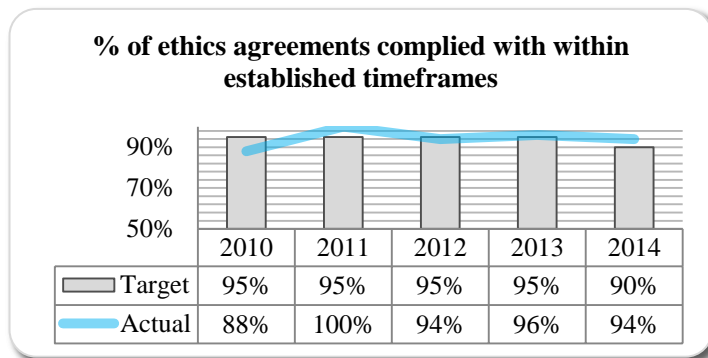|	2010	2011	2012	2013	2014
Target	95%	95%	95%	95%	90%
Actual	88%	100%	94%	96%	94%

Figure 6: Ethics Agreement Compliance

14

Reviewed the public financial disclosure reports of top officials

OGE also reviews the annual, termination, and transaction reports of PAS officials, as well as new entrant and other reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. The timely review of these reports helps ensure that these senior officials remain free from conflicts of interest. In fiscal year 2014, OGE reviewed over 900 public financial disclosure reports. Additionally, OGE reviewed over 700 periodic transaction reports. Notably, for the second year in a row OGE continued to complete its reviews more efficiently than in previous years. In fiscal year 2014, the average number of days between the receipt of a report and its certification was 19 days, four days less than fiscal year 2013 and 62 days less than fiscal year 2012.
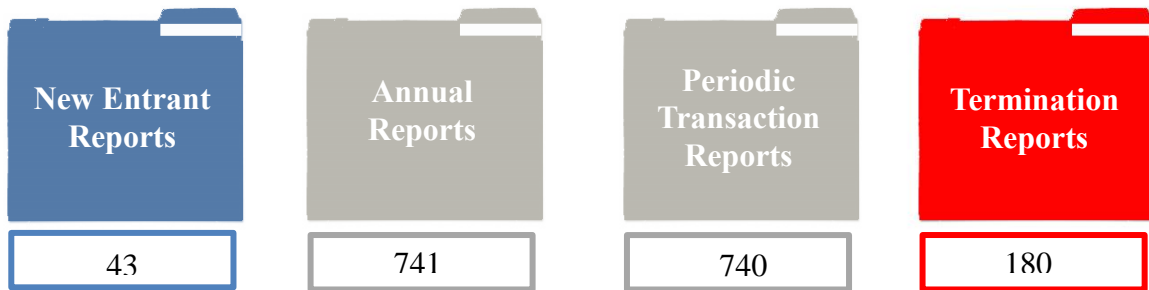
New Entrant Reports	Annual Reports	Periodic Transaction Reports	Termination Reports
43	741	740	180

Figure 7: Number of Financial Disclosure Reports Reviewed by OGE, by Type

% public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within the established time frames

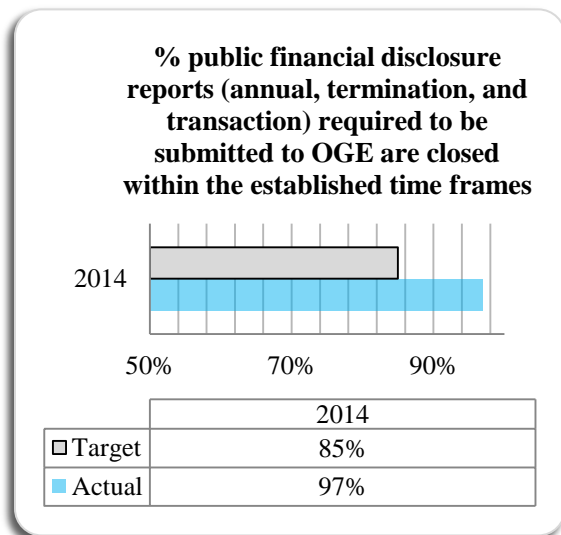|	2014
Target	85%
Actual	97%

Figure 8: OGE Review of Financial Disclosure Reports

Performance Goal: In fiscal year 2014, OGE received 17 percent more reports than in the prior year. This overall increase was attributed to an increase in the number of periodic transaction reports filed pursuant to the STOCK Act. Despite this increase in volume, OGE exceeded its target of completing reviews of public financial disclosure reports, including new entrant, annual, termination, and transaction reports required to be submitted to OGE within 60 days of receipt. OGE has created new procedures and has devoted significant resources toward this performance goal since 2012. In fiscal year 2012, OGE completed 54 percent of its reviews within the 60 days of receipt compared to 90 percent in fiscal year 2013 and 97 percent in fiscal year 2014.

Responded to agency requests to tailor their financial disclosure programs

OGE supports agencies' accountability for their ethics programs by analyzing and responding to agency requests to exclude certain positions from public financial disclosure requirements. These positions must be of a confidential nature and have no policy-making role. OGE also evaluates agency proposals for alternative confidential financial disclosure procedures to ensure that they will enable the agency to more readily identify and remedy potential conflicts

of interest among their employees. In fiscal year 2014, OGE reviewed and signed 33 determinations under 5 C.F.R. section 2634.203(b) for Schedule C employees requesting exclusions from the public financial disclosure requirements of title I of the Ethics in Government Act of 1978. OGE also reviewed and approved one agency request to modify an existing alternative financial disclosure procedure.

Supported the Inspector General community through advice, training, and collaboration

OGE provides advice and training to Inspectors General (IGs). In fiscal year 2014, OGE provided direct support to 10 IG investigators and federal prosecutors who requested assistance with the interpretation and application of federal conflict of interest laws and ethics rules. In addition, OGE instructors provided training to 75 attendees at the Inspector General Criminal Investigation Academy, focusing on investigating ethics-related matters and working with ethics officials. This particular training has become a standard part of the Academy's curriculum and complements a web-based training module OGE developed for IG investigators. OGE also presented on optimizing the relationship between IGs and ethics officials at the 2014 Council of the Inspectors General on Integrity and Efficiency (CIGIE) annual conference to approximately 100 attendees. This advice and training leads to more effective IG investigations of potential ethical wrongdoing by agency employees, and thereby results in employees being held accountable for adhering to the ethics rules.

OGE's Director is a standing member of CIGIE. In fiscal year 2014, OGE leadership actively participated as a member of CIGIE and its Integrity Committee, which examines allegations of misconduct against IGs and their direct reports. As a member of CIGIE, OGE assists IGs and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations, as well as how an effective ethics program supports enforcement.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to conduct reviews of agency ethics programs, gather data about each agency and the overall executive branch ethics program, monitor agency leaders' compliance with their ethics agreements, review senior officials' financial disclosure reports, and support the IG community. Key highlights of OGE's planned work are described below.

Conduct program reviews

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable requirements throughout the executive branch, OGE's Director has prioritized increasing OGE's review of agency ethics programs. As a result, OGE plans to conduct a program review of every agency in the executive branch at least once between January 2014 and January 2018.

In fiscal years 2015 and 2016, OGE will work toward achieving this priority through a combination of plenary reviews and inspections. Generally, OGE will conduct plenary reviews at

Cabinet-level departments and at the largest executive branch agencies, while inspections will largely be limited to the smaller agencies. However, as noted above, the inspection process also serves as a risk management tool by allowing OGE to assess whether an agency requires a full plenary review. If an inspection identifies systemic risks in an agency's ethics program, OGE will conduct a plenary review to more fully evaluate the program. This process ensures that program weaknesses and deficiencies are identified and corrected so that the associated risks to the agency are mitigated.

One mechanism by which program reviews currently enhance the executive branch ethics program is through the identification and sharing of model practices that agencies have implemented to effectively manage their programs. In fiscal years 2015 and 2016, OGE will continue to use the program review process to identify model practices and will increase its efforts to share these practices with the executive branch ethics community. By sharing innovative methods already in place at certain agencies, OGE can leverage the access afforded by the program review process to improve the executive branch program as a whole.

Conduct surveys to collect compliance data

In fiscal years 2015 and 2016, OGE will continue collecting and analyzing information about the executive branch ethics program. OGE will develop a new electronic application for collecting the Annual Questionnaire data. This application will make the data collection more efficient by using a platform described on page 45, and will improve OGE's ability to analyze the data. OGE will use the information collected through responses to the Annual Questionnaire to evaluate the executive branch ethics program. OGE also plans to use the data to identify trends, best practices, and any challenges the ethics program is facing. OGE will continue to share information from the Annual Questionnaire with the ethics community and the public on its website. In addition, OGE will continue to implement Executive Order 13490. OGE will conduct an executive branch-wide survey to gather data on compliance with the Order and will publish the results on OGE's website in the sixth annual report to the President on agency compliance with the Order.

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

OGE will continue working to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office. In 2015 and 2016, OGE will continue to monitor the timely compliance by PAS officials with the commitments in their ethics agreements. OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that these reports are timely filed, accurately completed, and thoroughly reviewed by agency ethics officials for potential conflicts of interest.

Support the vital work of Inspectors General

To support the work of Inspectors General in holding agency employees accountable for abiding by the conflict of interest laws, OGE will continue providing Inspectors General with

guidance on the interpretation and application of the conflict of interest laws and ethics rules in fiscal years 2015 and 2016. In addition, OGE leadership will regularly attend meetings of the Council of Inspectors General on Integrity and Efficiency. OGE staff will also continue to provide training as part of the Inspector General Academy's Public Corruption Investigations Training Program.

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

For the past two years, OGE has prioritized work on its strategic objective of contributing to the professional development of ethics officials. OGE is committed to educating executive branch ethics officials and federal employees on the conflicts of interest laws and ethics regulations. OGE's team of professional staff and attorneys has worked diligently to promote continuous learning, thereby increasing the overall skill of the executive branch's corps of professional agency ethics officials. In turn, OGE leverages these agency ethics officials to train the broader federal workforce regarding their ethical responsibilities. In fiscal year 2013, OGE increased registrations for its educational offerings by 238 percent over the previous year. In fiscal year 2014, OGE increased registrations beyond even the 2013 result by an additional 27 percent. When the offerings at the 2014 National Government Ethics Summit are also included, the percentage increase over fiscal year 2013 becomes a 37 percent increase. Not only is the quantity of OGE training noteworthy, so is the quality. As discussed below, the overwhelming majority of registrants for OGE's educational offerings rated the quality of the offerings very highly.

In consultation with OMB, OGE has determined that performance toward this objective is making noteworthy progress.

Performance Highlights

OGE's success in leading the decentralized executive branch ethics program relies greatly on an informed community of ethics officials. In fiscal year 2014, OGE provided an array of educational opportunities to ensure that ethics officials had access to the expertise and tools they needed to do their jobs. Leveraging technology and existing resources, OGE was able to provide these opportunities to agencies either free of charge or for a low cost.

Developed effective training products

OGE developed effective educational products to contribute to the professional development of ethics officials and to support their training and counseling of agency employees. Specifically, OGE assisted ethics officials in developing and sharing products for annual training for their agencies' employees. Through the creation of the OGE Institute for Ethics in Government (IEG) store located on MAX.gov, OGE made available to the community a variety of educational course materials, practical job aids, and reference guides created to assist ethics officials in the day-to-day operations of their programs. Through the IEG store, OGE also provides a repository where the community can share similar products the community itself has created, including materials to assist with annual employee ethics training. The IEG store is an efficient way for agency ethics officials to browse educational materials and identify those that

are most pertinent to their particular needs. All of the educational materials located in the store are available free of charge.

To further encourage the creation and sharing of educational and practical job-related products, OGE partnered with the Pension Benefit Guaranty Corporation in fiscal year 2014 to host a one-day symposium for ethics officials to develop products to share with the community. The 55 registered attendees at the workshop created 16 separate, unique products, including short videos, job aids, reference guides, presentation slide decks, and course materials. These products were then presented to the community through a virtual symposium attended by more than 150 officials. Afterward, OGE posted the products created in the IEG Store so that the rest of the ethics community could immediately benefit from their peers' creative training efforts.

In addition to the products available in the IEG Store, OGE makes available all of the video and audio recordings of the distance learning events OGE sponsors, as well as the informational slide decks, job aids, and reference materials created to support those events, on-demand through MAX.gov.

Performance Goal: The results from the Annual Survey of Ethics Officials show that OGE met its target for the percentage of ethics officials who use training products made available by OGE.

% of ethics officials that use training products made available by OGE

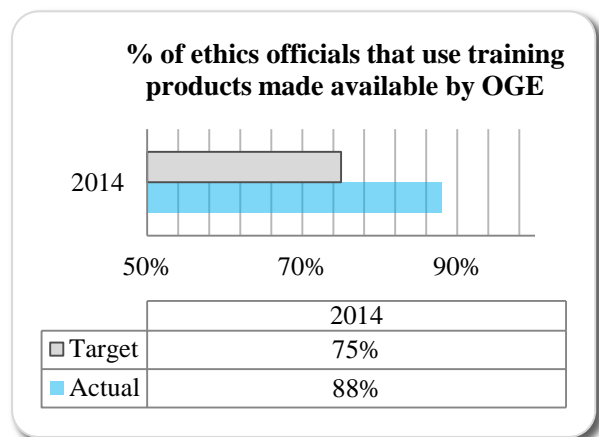|	2014
☐ Target	75%
■ Actual	88%

Figure 9: Ethics Training Products

Held twice-annual symposia for ethics practitioners

OGE periodically offers symposia, which are events that allow large groups of ethics officials to receive training and collaborate with other ethics professionals. Symposia bolster community building between OGE and executive branch ethics officials, as well as increase the knowledge and skills of ethics professionals. In fiscal year 2014, OGE held 2 symposia: the training products symposium described above and its first National Government Ethics Summit for hundreds of ethics practitioners as described below.

Held OGE's first National Government Ethics Summit, an innovative solution to costly training conferences

In September 2014, OGE held the first National Government Ethics Summit, a low-cost, multi-day training event for over 400 attendees. The Summit, which OGE held in lieu of the traditional conference that it has presented regularly since 1980, brought together executive branch ethics officials and external stakeholders. The external stakeholders included ethics officials from the other branches of the federal government, ethics officials from state and local governments, staff from various offices of Inspectors General, members of the press, advocates from good government groups, and noted thinkers from academia. OGE designed the Summit to strengthen the executive branch ethics program by providing attendees with opportunities to

deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections with ethics officials who can assist in resolving even the most complex ethics issues.

The Summit consisted of seven days of live instruction and over 120 training sessions throughout the month of September. A total of 520 participants attended in person on the three primary dates of the Summit that featured topics of broad interest. More than 360 additional participants registered for invitational days that focused on specialized topics. Notably, OGE held these high-quality training events exclusively in federal facilities in the Washington, D.C. metro area at a total cost, excluding salaries, of approximately $12,000 for the entire Summit.

As a means of both expanding the reach of the Summit and increasing the transparency of the executive branch ethics program, OGE leveraged technology to broadcast many of the sessions and a number of virtual-only events by live streaming video on the internet. This afforded additional stakeholders and interested members of the public significant access to the Summit. OGE has also posted recordings of these events on its YouTube and Google+ pages, so that they will remain available for future viewing. Web analytics indicate that this material has received 4,377 unique views.

As a result of the Summit, participants gained critical knowledge to increase their expertise in applying the ethics laws, rules, and regulations. They attended sessions covering topics such as: the rules applicable to special Government employees; the finer points of 18 U.S.C. § 208, the primary criminal conflict of interest law; the Standards of Ethical Conduct for Executive Branch Employees; post-employment restrictions; restrictions on the receipt of gifts; regulatory and individual exemptions from conflicts of interest requirements; rules controlling the participation of federal officials on the boards of outside entities; and STOCK Act requirements.

Summit sessions also covered topics that address the challenge of administering a strong agency ethics program. For example, participants attended sessions in which they had opportunities to explore approaches for administering sound financial disclosure systems, managing ethics records, and working with Inspectors General. They also attended sessions covering techniques for communicating government ethics requirements to government officials, compliance with regulatory requirements for agency ethics programs, electronic filing of financial disclosure reports, the identification of confidential financial disclosure filers, and other program management issues. Seasoned ethics officials shared lessons learned, model practices, and promising new practices that participants could choose to adopt for their own ethics programs.

Finally, the Summit exposed participants to the insights of speakers, from both inside and outside the government, related to the broader purpose and effect of organizations' ethics programs. Participants attended sessions on such diverse topics as the similarities, challenges, and solutions faced by private and public sector organizations in dealing with ethics; perspectives on the so called "revolving door;" the importance of government ethics; and ways in which the press, good government groups, and others work toward common goals in supporting the integrity of public institutions. These sessions fostered increased understanding among

OGE's internal and external stakeholders about the executive branch ethics program and how it protects the public trust.

Conducted regular and seasonal online distance learning events

In fiscal year 2014, OGE continued to deliver its Ethics Fundamentals and Advanced Practitioner distance learning series. These series are designed to address, respectively, the needs of new and more experienced ethics officials in the executive branch ethics community. These monthly events allow OGE to reach ethics officials throughout the government with timely policy guidance, basic training, advanced training, model practices, and ethics news and information. A typical event reaches more than 200 officials during the live broadcast and is available on-demand for viewing after the event. In 2014, OGE offered nine Advanced Practitioner events and nine Fundamentals events. In total, 3,214 officials registered for these events, and 92 percent of them reported that participating in these events made them better able to do their jobs.

In addition to the Ethics Fundamentals and Advanced Practitioner monthly distance learning series, OGE also offered 12 financial disclosure distance learning workshops. These small workshops allow attendees to interact with each other and engage directly in the review of sample hypothetical financial disclosure forms. Over 120 ethics officials registered to attend these workshops and 94 percent of them reported that participating in the workshops made them better able to do their jobs.

Expanded access to training through new formats and technology

In fiscal year 2014, OGE continued to leverage technology by taking advantage of new modes of delivering training to the ethics community. For example, OGE took a significant step toward expanding access to its distance learning offerings by creating a [Google+ page](). This allows OGE to broadcast distance learning events free of charge to anyone with an internet connection. In addition, training delivery through Google+ permits public access to the professional development training that OGE offers to ethics officials throughout government and around the world.

In addition to the monthly series and the small, application-based workshops, OGE developed and delivered two Massive Open Online Courses (MOOCs), modeled after the approach used by the higher education community. The MOOCs enable large numbers of ethics officials to experience content OGE typically only delivers through half-day live training workshops. The MOOCs are delivered virtually over two online sessions. The first session is an introduction to the materials, the exercises, and the expectations for the course, as well as a general introduction to the topic being addressed. The second session is a live debrief of the exercises led by OGE instructors. These courses address more advanced content and require participants to practice using their skills by completing exercises between sessions. Participants are encouraged to consult and collaborate with colleagues in completing the exercises, ask questions, provide comments, and otherwise actively engage in the analysis and discussion during the live debrief. To the greatest extent possible, the MOOCs bring the feel of in-person

classroom training to the online experience. Over 450 officials participated in the MOOCs, with 95 percent of attendees reporting that attendance made them better able to do their jobs.

Performance Goal: In fiscal year 2014, OGE significantly increased its educational offerings, which were well-received by attendees. As a result of attending courses offered by OGE, ethics officials overwhelmingly reported that they better understand the subject matter presented and believe they can more effectively perform their job functions.
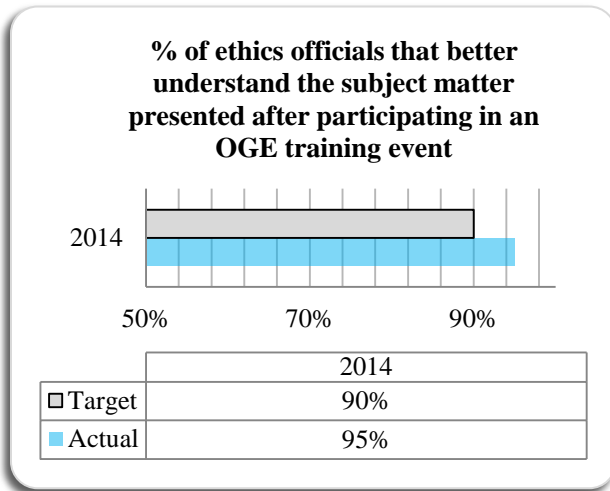
% of ethics officials that better understand the subject matter presented after participating in an OGE training event

2014 — 50% 70% 90%

	2014
☐ Target	90%
■ Actual	95%

Figure 10: Subject Matter Expertise

% of ethics officials that believe they can more effectively perform their job functions after participating in an OGE training event

2014 — 50% 70% 90%

	2014
☐ Target	90%
■ Actual	91%

Figure 11: Performance of Job Function

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to focus on providing cost effective training and education opportunities to ensure that ethics officials have the expertise and tools they need to do their jobs. To develop an education plan responsive to the needs of agency ethics officials, OGE conducted an assessment of ethics officials who attended previous training events to determine the format and content they need for their professional development. OGE will use data from the assessment to refine its educational offerings for 2015 and 2016. Key highlights of OGE's planned work are described below.

Develop training products

OGE will continue to develop ethics educational products and to disseminate products created by OGE and agency ethics programs through its virtual Institute for Ethics in Government Store located on MAX.gov. In particular, OGE's staff will create original products, including materials that agencies can customize to satisfy regulatory requirements for their new-employee ethics orientations and annual ethics training.

Hold twice-annual symposia for ethics practitioners

In fiscal year 2015, OGE will hold two symposia, one local and one in a region outside of the Washington, D.C. metro area. Based on 2013 data from the Annual Questionnaire, approximately 72 percent of all ethics officials (full-time and part-time combined) are located in

regional field offices. Often their access to OGE and live training OGE provides is limited by their distance from the Washington, D.C. metro area. OGE plans to hold a regional symposium in fiscal year 2015 to specifically address the critical professional development needs of regional ethics officials. It is anticipated that this training will have a tangible impact on maintaining the integrity of executive branch ethics programs across the country. OGE will also host a symposium in the Washington, D.C. metro area. The topics to be covered at both symposia will be informed by the data collected on the number and nature of questions OGE receives from agency ethics officials as recorded in Agency Information Management System (AIMS).

In fiscal year 2016, OGE will host its second National Government Ethics Summit. The primary focus of the Summit will be to prepare ethics officials to effectively respond to the ethics issues that will arise due to the Presidential transition in 2017. These issues include nominee financial disclosure, seeking employment, and post-employment restrictions. This event will be important to the success of OGE's role in the Presidential nominations process as described in more detail on page 26 under Strategic Objective 2.1.

Conduct online distance learning events and expand access to training

In fiscal year 2014, OGE invested in the tools necessary to produce quality, virtual training materials and events. This investment has resulted in a dramatic increase in the effective reach of OGE's training and positive feedback about the quality of the training delivered. OGE will continue to deliver the Ethics Fundamentals and the Advanced Practitioner distance learning series. In addition to these series, OGE will also offer distance learning workshops and will continue to deliver training through its newly developed MOOC program. OGE will broadcast these events free of charge through its Google+ and YouTube pages to expand access to its training to a larger audience. OGE will also leverage the experience and knowledge of the ethics community by inviting ethics officials to regularly present as part of these distance learning events. Through such training events, OGE will provide ethics officials throughout government with needed basic training, exposure to model practices, timely policy guidance, and ethics news and information.

Strategic Objective 1.4: Modernize and implement the ethics rules and regulations

Ethics rules and regulations serve as the building blocks of the executive branch ethics program. OGE reviews and revises the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21st century government.

Performance Highlights

Began an in-depth review of ethics regulations on gifts and seeking employment

In fiscal year 2014, OGE began an in-depth review of the Standards of Ethical Conduct for Executive Branch Employees found at 5 C.F.R. part 2635 (Standards).The Standards serve as the foundation of federal government employment and set the expectations of conduct for every executive branch employee. OGE targeted for review two areas of significant interest to ethics officials and employees: gifts and seeking employment. OGE focused its review on these topics

because the gift rules generate more questions than any other area of the Standards and because the rules governing seeking employment were affected by new requirements enacted as part of the STOCK Act. Specifically, these changes imposed additional reporting and recusal requirements for federal employees negotiating for future non-government employment. As part of its review, OGE solicited input from agency ethics officials to leverage the expertise and experience of those who are charged with providing employees advice on these rules every day. Their feedback was used to inform OGE's approach to revising the Standards and in drafting potential regulatory text.

Performance Goal: OGE met its target to begin drafting revisions to subparts B (Gifts) and F (Seeking Employment) of the Standards of Ethical Conduct for Executive Branch Employees.

Reviewed and updated ethics regulations

In addition to conducting a targeted review and update of the Standards, OGE updates its regulations to ensure that they reflect statutory changes and changes in other agencies' regulations. For example, in fiscal year 2014, OGE published a final rule amending the regulations on financial disclosure to reflect a statutory increase of the reporting threshold for gifts and travel reimbursements. OGE also published a final rule amending the Standards to increase the ceiling for the exception for non-sponsor gifts of free attendance at widely attended gatherings. This amendment reflected the increase by GSA of the de minimis level in the Foreign Gifts and Decorations Act. Finally, OGE issued a final rule revoking certain regulatory exemptions for senior employee positions at the Security Exchange Commission (SEC) from certain criminal post-government employment restrictions at the request of, and in consultation with, the SEC.

OGE also consults with agencies to publish agency-specific supplemental ethics regulations that tailor agency ethics program requirements to meet specific agency needs. In fiscal year 2014, OGE jointly issued two new supplemental agency ethics regulations related to agency employees seeking prior approval to engage in outside employment and component designations for post-employment restrictions.

Maintained and updated financial disclosure forms

OGE oversees a financial disclosure system designed to detect and resolve conflicts of interest that reaches more than 27,000 public and over 370,000 confidential financial disclosure report filers. As part of this oversight, OGE maintains and updates financial disclosure forms. In fiscal year 2014, OGE solicited comments through the Federal Register and submitted for approval a request to modify and renew the OGE Form 278 (Executive Branch Personnel Public Financial Disclosure Report) and OGE Form 450 (Executive Branch Confidential Financial Disclosure Report). In anticipation of the release of *Integrity*, OGE's electronic public financial disclosure system, OGE obtained approval for the OGE Form 278e, a streamlined rendering of information entered by filers into the system. OGE also submitted for approval its request to modify and renew the OGE Form 201 (Request to Inspect or Receive Copies of OGE Form 278

and Other Covered Records). All three requests were successfully approved and the revised forms were posted to OGE's website to provide filers and requesters with accurate forms.

Updated ethics records schedules

OGE worked with the National Archives and Records Administration (NARA) on updating its General Records Schedule (GRS) provisions related to ethics records. Specifically, OGE consulted with and assisted NARA in updating the GRS to revise and consolidate provisions related to the disposition of ethics records. OGE also assisted NARA in addressing comments on the proposed changes from agency ethics officials and agency records officers.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to work on modernizing and updating ethics regulations as needed to reflect current statutory and regulatory requirements; issuing supplemental agency ethics regulations in consultation with executive branch agencies; and maintaining and updating OGE financial disclosure and other forms. OGE will also continue to work with NARA on updating the GRS to consolidate the provisions related to ethics records disposition. Key highlights of OGE's planned work are described below.

Submit new and revised ethics regulations for review and publication

In fiscal year 2015, OGE plans to make significant progress toward finalizing key regulatory changes. OGE will finalize the regulations concerning negotiations for future employment required by the STOCK Act. These regulations will ensure that executive branch employees have clear guidance on how to comply with these requirements when they seek employment outside of the government. OGE will also finalize and submit the proposed changes to the Standards on the acceptance of gifts from outside sources to the Department of Justice and the Office of Personnel Management, as is required by OGE's organic statute. OGE will also provide the proposed changes to other stakeholders, such as good government groups and ethics officials, for review. These proposed regulatory changes would tailor the gift rules to focus on issues that could affect the public's confidence in government decision making.

In fiscal year 2016, after receiving the necessary clearance from the Department of Justice, the Office of Personnel Management, and OMB, OGE plans to publish the proposed changes to the Standards in the Federal Register for public comment. OGE's update to the Standards will ensure continued effectiveness and applicability to situations faced by employees in a 21st century government. In fiscal years 2015 and 2016, OGE will also begin the process of revising its training regulations.

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

OGE plays an important role in the continuity of senior leadership in the executive branch by assisting in the President's constitutional duty to nominate and appoint officers to the executive branch. Specifically, OGE works with agency ethics officials to identify and resolve

any conflicts leaders coming into government may have. This work is especially critical during a Presidential transition when, due to vacancies in virtually every high-level position, the nation is particularly vulnerable to risks. Therefore, the requested resources, staffing and *Integrity* funding is vital in 2016 to ensure that OGE is ready for the 2017 post-election period. Because agency leaders play a significant role in promoting an ethical culture and supporting an agency's ethics program, OGE also leverages the nomination process to impart to new agency leaders the importance of the ethics program and their role in supporting it. In addition, OGE contributes to the continuity of senior leadership by supporting succession-planning efforts in executive branch agency ethics programs. Proper succession planning is key to mitigating the loss of ethics expertise that stems from the significant turnover within the executive branch due to the retirement of experienced executive branch officials.

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

OGE reviews the financial interests of nominees to Presidentially-appointed, Senate-confirmed (PAS) positions for possible conflicts of interest with their prospective duties. OGE works with ethics officials to resolve any identified potential conflicts of interest on the part of nominees by establishing written ethics agreements with them prior to confirmation. For most PAS nominees, OGE's financial disclosure program represents their first encounter with the ethics requirements of the executive branch. Therefore, the ethics review of PAS nominees' financial interests provides OGE with the opportunity to impress upon these most senior executive branch officials the importance of their roles as top leaders in creating and fostering an ethical culture at their agencies.

OGE's role in assisting the President in nominating top-level executive branch officials is particularly important during the transition period following a Presidential election. The nation is vulnerable to a variety of risks, including risks associated with national security and natural disasters, during a Presidential transition when leadership is transferred and nearly all political positions are vacant. For this reason, the processing of Presidential nominations must be accomplished as efficiently as possible. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest, a role for which OGE's workload is expected to triple with the election of a new Administration in 2016. OGE will prepare for the transition by filling vacant ethics positions and cross training existing staff, as well as devoting additional resources to prepare its staff and agency ethics officials across government for the anticipated increase in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2017 and beyond.

Because OGE's new efiling system, *Integrity,* was newly launched in January 2015 and because OGE expects to continue to refine and upgrade the system, OGE, in consultation with OMB, has highlighted this objective as a "focus area for improvement."

Performance Highlights

Reviewed financial disclosure reports of the highest government leaders

In fiscal year 2014, OGE reviewed the reports of nominees for approximately 25 percent of the Senate-confirmed, Presidentially-appointed positions. By leveraging existing resources and improving internal processes and tracking, OGE was able to meet the priorities set by the White House and the Senate.
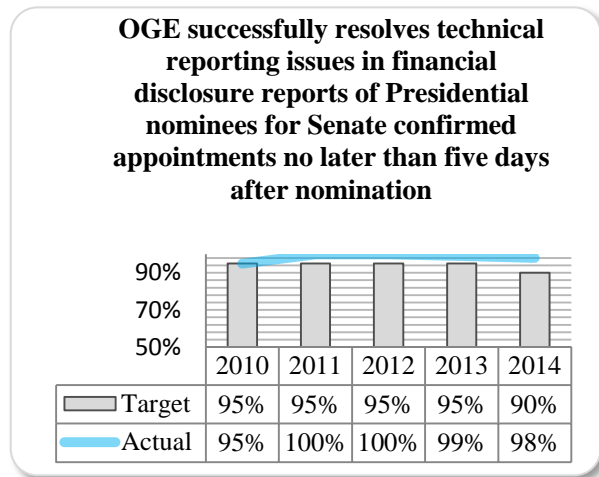
	OGE successfully resolves technical reporting issues in financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination				
	2010	**2011**	**2012**	**2013**	**2014**
Target	95%	95%	95%	95%	90%
Actual	95%	100%	100%	99%	98%

Figure 12: PAS Nominee Financial Disclosure Reports

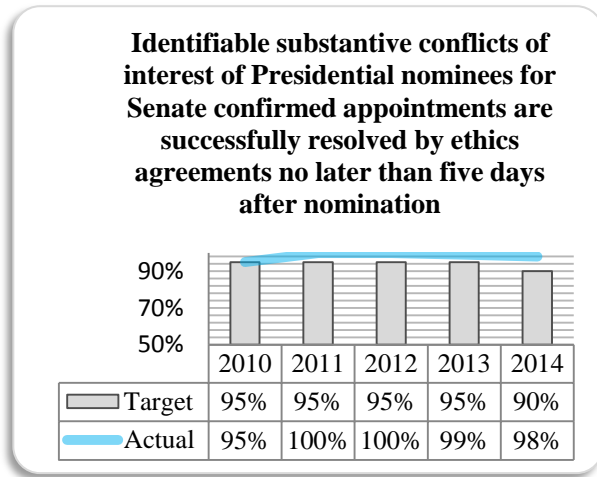|	Identifiable substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination				
	2010	**2011**	**2012**	**2013**	**2014**
Target	95%	95%	95%	95%	90%
Actual	95%	100%	100%	99%	98%

Figure 13: Ethics Agreements of PAS Nominees

Performance Goal: OGE measures its performance by the successful and timely resolution of conflicts and technical reporting issues for nominee financial disclosure reports. OGE's standard is to resolve conflict and technical reporting issues no later than five days after a nomination is made. OGE continues to exceed its targets in this area.

Developed key resources for financial disclosure filers

In fiscal year 2014, OGE created two new resources to help nominee financial disclosure filers more accurately complete their reports. These resources clarify financial disclosure reporting requirements, including the types of financial interests that must be reported, and explain how to report commonly held financial interests. By improving the accuracy and completeness of initial financial disclosure report drafts submitted by filers, these resources ultimately assist agencies and OGE in more efficiently identifying potential financial conflicts of interest and decrease the time it takes to resolve technical reporting issues.

Developed a statutorily-mandated electronic public financial disclosure filing system for the executive branch

In fiscal year 2014, OGE substantially completed development of *Integrity*, OGE's system for the electronic filing and review of public financial disclosures (OGE Forms 278 and 278-T) required for certain high-level executive branch officials, as mandated by the STOCK Act. The development of such a large and complex system was an immense undertaking for an agency with OGE's limited human resources and technological expertise. Developing and testing

Integrity required an agency-wide commitment and participation from virtually every member of OGE's staff. It is anticipated that *Integrity* will greatly enhance the filing, review, and program management aspects of the executive branch public financial disclosure program. It will also meaningfully increase OGE's oversight capability by allowing OGE to monitor agencies' progress in administering their individual financial disclosure programs.

In addition to the internal work that OGE dedicated to developing *Integrity,* during fiscal year 2014, OGE routinely collaborated with groups from throughout the government in order to share ideas and to ensure that the system met the needs of its stakeholders. These groups included financial disclosure report filers, executive branch agency ethics officials, and ethics officials and system developers from all branches of government.

Throughout the development process in fiscal year 2014, OGE conducted extensive evaluations of the system to ensure that it complied with government security, privacy, and various technical requirements. OGE undertook rigorous verification and validation testing among executive branch ethics officials and OGE staff. OGE also held numerous information and question-and-answer sessions on *Integrity* for the executive branch ethics community during OGE's month-long National Government Ethics Summit in September 2014.

Planned Work for Fiscal Years 2015 and 2016

Prioritize and increase capacity to review complex financial disclosure reports of high-level government officials

In fiscal years 2015 and 2016, OGE will prioritize hiring and training staff on complex financial disclosure issues to prepare for the surge in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2017, following the 2016 Presidential election. During the Presidential transition, OGE anticipates the turnover of most of the approximately 1,200 PAS positions in the executive branch. Because OGE uses a cross-functional approach to staffing the nominee report review program, particularly during peak workload periods, it will hire professional ethics staff in key mission areas, specifically compliance and agency support, and cross-train the staff to support financial disclosure work. This approach ensures both short-term capacity for its critical PAS nominee work in the post-election period and long-term support for OGE's mission-critical work. OGE will also devote significant resources toward building the knowledge and skills of OGE staff members who review financial disclosure reports by providing classroom as well as hands-on experiential training.

Assist agencies in preparing for the ethics and financial disclosure responsibilities associated with a Presidential transition

In addition to managing the surge in financial disclosure filings related to a high volume of incoming nominees, agencies also must provide each new employee with an initial ethics orientation. Further, those officials leaving government service must be educated about the various ethics rules that apply to seeking employment and post-government employment. In fiscal years 2015 and 2016, OGE will provide resources and education opportunities to ethics officials on these other Presidential transition-related topics. This will involve updating all

transition materials, including training resources for agency ethics officials and incoming nominees concerning ethics rules, financial disclosure, and the criminal conflict of interest statutes. OGE will also devote additional staff resources to conducting training for nominee financial disclosure reviewers at agencies throughout the executive branch and to meeting with key executive branch agency ethics officials to support them in their own preparations for the post-election period. This work will help ease the transitions of PAS nominees into top leadership positions in the new Administration in 2017.

OGE will also present a National Government Ethics Summit in fiscal year 2016, focused on financial disclosure review for nominees and other transition-related topics such as post-government employment. The Summit will consist of multiple in-person events including a full-day in-person event for the approximately 300 agency ethics officials who review nominee financial disclosure reports. This event will provide an opportunity for ethics officials to gain hands-on experience in reviewing nominee financial disclosure reports and will be followed by smaller workshops that build on the knowledge gained at the event.

Launch and operate Integrity, OGE's electronic executive branch-wide public financial disclosure system

In fiscal year 2015, OGE launched and began operating *Integrity,* the executive branch-wide public financial disclosure system required by the STOCK Act. OGE will continue to refine and enhance the system in fiscal years 2015 and 2016. More specifically, in fiscal year 2015, OGE will actively collaborate with agencies to tailor various administrative roles and workflows to conform to agencies' financial disclosure filing and review structures. OGE will work with agencies to establish filer accounts and to assist them in configuring their administrative preferences within the system so that financial disclosure filers can enter and submit reports for review and certification by ethics officials during the fiscal year 2015 filing cycle. OGE will also implement a vigorous user support plan. This plan will include the development and publication of an online assistance library complete with FAQs, video tutorials, and quick-start guides. OGE will hire two additional professional IT personnel to staff a full-time help desk that ethics officials can contact with their questions about *Integrity*. OGE will also take the opportunity during the first year of *Integrity*'s operation to monitor and assess user feedback regarding the system functionality as well as its operating experience. This will allow OGE to prioritize and implement any necessary system enhancements and to address any technical issues that are likely to arise in such a complex application. Based on this experience and user feedback, in fiscal year 2016 OGE will use requested funding to develop an improved version of *Integrity* to ensure it is available in time for the Presidential transition.

In fiscal year 2016, OGE will also continue to focus on operating, refining, and enhancing *Integrity.* Specifically, OGE will use requested funding to develop a significantly revised version of *Integrity* and to finalize the improved version of the efiling system prior to the Presidential election. The upgraded version will be critical because it is expected to add important new functionality not included in the initial launch of the system, such as system "flags," advanced analytics, and expanded ethics-related data collection and tracking. Moreover, in fiscal year 2016, after *Integrity* has been operational for a full year, OGE anticipates that even

more agencies will transition to *Integrity* from fee-for-use efiling systems in order to take advantage of the additional functionality that *Integrity* will provide at no cost.

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

The success of each agency's ethics program is in large part dependent on the commitment of the agency's leadership to, and involvement in, the ethics program. Leadership support of an agency's ethics program helps agencies identify, assess, and mitigate risk to an agency's reputation and mission, enables agency leaders to focus on and accomplish agencies' missions, and helps ensure the integrity of government programs and operations.

Performance Highlights

Engaged agency leaders about the importance of ethics

Throughout fiscal year 2014, OGE renewed its commitment to meet with senior leaders in the executive branch to emphasize the importance and benefits of a strong executive branch ethics program and the unique role agency leadership plays in promoting an ethical culture. Notably, OGE's Director met with the Chair of the Federal Reserve and the Secretary of the Department of Veterans Affairs. OGE leaders also met with senior leaders and ethics officials from other agencies such as the Department of Defense. OGE used these opportunities to discuss the ways in which agency leaders can support the ethics program and to solicit feedback on how OGE can provide support and assistance to agencies.

Performance Goal: In OGE's Survey of Ethics Officials, 88 percent of respondents reported that their agency leaders demonstrate support for the ethics program. Also, ethics officials from 119 agencies indicated that in calendar year 2013, they had reported directly to the agency head about the status of the ethics program. This is a strong indicator that ethics officials have access to agency leaders.

Provided training on risk management for agency leaders

As part of the National Government Ethics Summit held in September 2014, OGE provided several sessions and workshops on organizational risk management for senior government officials. These sessions focused on, among other things, the importance of ethics and on the role of agency leadership in promoting the executive branch ethics program. OGE also conducted sessions on ways that agency ethics officials can help leaders take responsibility for their agencies' ethics programs and lead those programs to success.

Sensitized federal managers to ethics issues

OGE presented on ethics topics at various events targeted at higher level personnel in fiscal year 2014. For example, OGE participated in a panel discussion titled "Ethics and Optics," which was part of a two-day orientation session for 250 new Senior Executive Service (SES) members. The panel was designed to help participants recognize and avoid common ethical violations, identify the people who can help them to navigate potential pitfalls, and encourage

them to serve as ethical leaders in their own organizations. OGE also presented at the National Annual Federal Hispanic Women Leadership, Diversity and Inclusion Training Program, which is targeted at federal government supervisors and managers who oversee federal employees.

<u>Planned Work for Fiscal Years 2015 and 2016</u>

As a result of the findings of OGE's strategic objective review process, in fiscal years 2015 and 2016, OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will use its education and training program to raise awareness of the benefits of a strong ethics program in reducing agency risk. In addition, OGE will further consult with ethics officials to determine how OGE can best support their efforts to engage agency leadership. Key highlights of OGE's planned work are described below.

Use agency ethics program reviews to engage agency leadership

In fiscal years 2015 and 2016, OGE will continue to work with agency ethics officials to identify steps OGE can take to provide assistance in gaining leadership support for individual agency ethics programs. For example, during its program reviews of agency ethics programs, OGE will recommend that agency leaders take a visible role in the program and will recognize in its program review reports activities that agency leaders have taken to support the ethics program. Also in connection with OGE's program review processes, the Director will include personal transmittal letters to the heads of certain agencies as part of the review report packages. These letters will invite agency heads to meet with him to discuss the results of program review reports and the ethics program in general.

Communicate directly with agency managers and leaders

In fiscal year 2015, OGE will implement a new process of sending year-end status reports to the head of each agency regarding the annual financial disclosure reports of the agency's PAS officials. The status report will include, if applicable, the name(s) of the PAS officials(s) whose reports OGE has not certified. OGE will institute this practice because financial disclosure is the primary tool for identifying and resolving potential conflicts of interest on the part executive branch officials. An agency's failure to collect and review PAS officials' reports, resolve all conflicts of interest, and obtain OGE's certification in a timely manner places filers at risk of violating criminal conflicts of interest laws. More broadly, it diminishes the credibility of the ethics program and undermines the public's confidence in the integrity of the government's operations.

OGE will also continue to identify opportunities to communicate directly with senior leaders in government by speaking at events targeted at agency managers and other senior leaders, such as management training programs for SES employees offered by entities such as OPM and the Partnership for Public Service.

Raise awareness of the benefits of a strong ethics program in reducing agency risk

In fiscal years 2015 and 2016, OGE will dedicate a portion of its distance and in-person learning events to the topic of enterprise risk management, as defined by section 270 of OMB Circular A-11. In these sessions, OGE will discuss with ethics officials how the ethics program can support their agency and its leaders in implementing agency-wide risk management. Instructors will discuss how ethics officials can work with leadership to identify, assess, and address ethics and reputational risk at their agencies.

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

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

Performance Highlights

Enhanced the professional development of agency ethics officials

In fiscal year 2014, OGE supported the development of new ethics officials by delivering nine intensive days of fundamental ethics education through its Intensive Curriculum for New Ethics Officials program. This program targeted new ethics officials who had a critical need for intensive and rapid professional development because they had been or would soon be newly assigned to ethics responsibilities as Designated Agency Ethics Officials (DAEOs), Alternate DAEOs, or ethics program managers. By focusing on those officials with the greatest responsibilities, OGE provided targeted, timely support to ensure continuity of operations in agency ethics programs.

Performance Goal: Twenty-one ethics officials attended the Intensive Curriculum for New Ethics Officials. One-hundred percent of attendees who returned course evaluations reported that they are better able to do their jobs as a result of the program. This result greatly exceeds OGE's target of 80 percent.
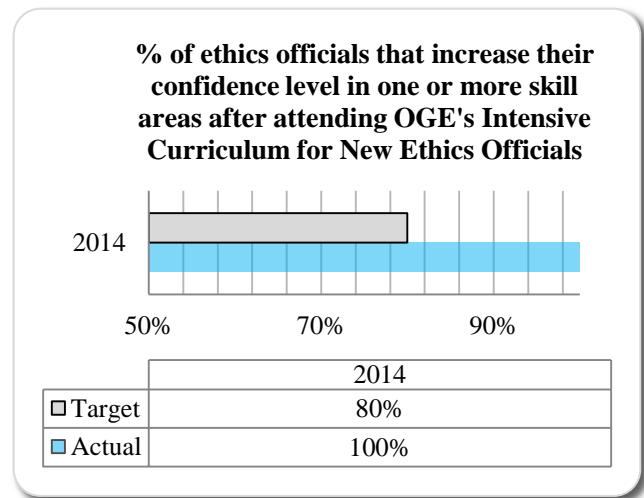

% of ethics officials that increase their confidence level in one or more skill areas after attending OGE's Intensive Curriculum for New Ethics Officials

	2014
☐ Target	80%
☐ Actual	100%

Figure 14: Intensive Curriculum for New Ethics Officials

Developed qualified agency ethics instructors

OGE also conducted five instructor development courses. The Instructor Development Program is a certificate program for agency ethics instructors who, upon successful completion,

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are qualified to effectively deliver OGE-developed ethics courses in their own agencies and throughout the executive branch. The Instructor Development Program expands the number of instructors available to deliver important ethics education to ethics program staff throughout the government. Moreover, it supports succession planning in agency ethics programs by empowering and equipping agencies to provide quality internal professional development to their own ethics program staff in a targeted way that best meets their staff development needs. In fiscal year 2014, officials from 10 agencies attended the program and successfully learned to teach one or more OGE-created courses.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will build on its efforts to assist agencies in training future ethics officials and will leverage the expertise of experienced ethics officials through the Instructor Development Program. Key highlights of OGE's planned work are described below.

Provide targeted training to support succession planning

In fiscal years 2015 and 2016, OGE will educate ethics officials on ethics matters related to Presidential transitions. OGE will also dedicate a significant portion of its Advanced Practitioner Series to help ethics officials solidify ethics program processes and procedures, as well as maintain institutional knowledge to ensure the strength of agency ethics programs even in times of transition. For example, OGE will promote routinizing risk assessment and mitigation, standard operating procedures to ensure program continuity, techniques for briefing new leaders, and methods of program self-assessment to ensure preparedness for turnover.

Offer firsthand experience to agency ethics officials through an interagency detail at OGE

OGE will also continue to invite agency ethics officials to participate on an interagency detail at OGE. Ethics officials would serve as Desk Officers or financial disclosure reviewers while on detail at OGE. This detail program strengthens the executive branch ethics program because it allows agency ethics officials to gain valuable hands-on experience with support from OGE's knowledgeable staff and then bring that knowledge back to his or her home agency ethics program.

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

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

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

Raising the visibility of the executive branch ethics program and of OGE are critical steps toward building public confidence and awareness of the systems in place to protect the integrity of government operations and programs. To raise the visibility of the executive branch ethics program, OGE shares information and engages with audiences inside the federal government as well as external audiences, including members of the general public, state and local governments, private sector organizations, professional associations, government watchdog groups, the media, and foreign delegations.

Performance Highlights

Built a culture of information sharing and strategic communication

In fiscal year 2014, OGE pushed its initiative to build a culture of information sharing and strategic communications with its external stakeholders. In fiscal year 2014, a cross-division communications team worked to ensure consistency in OGE's external messaging, develop comprehensive communications plans for significant OGE initiatives, and create compelling and audience-friendly content for OGE's various communications platforms, including OGE's social media accounts and website. These efforts ensure that OGE disseminates information in a manner that is more easily understood by and accessible to its external stakeholders and that is targeted to those most interested in the content. These communications also ensure that OGE's stakeholders gain a greater understanding of OGE's work and can identify opportunities for coalition building and collaboration with OGE.

Performance Goal: Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program. OGE measures the success of this performance goal through various performance indicators included in Figures 15-17 below.

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

OGE's website is its primary tool for communicating with its external stakeholders. In fiscal year 2013, OGE began the process of reviewing and updating content on its website to ensure that the public can understand the work of OGE. In fiscal year 2014, OGE implemented a new strategy for communicating with the public through Director's Notes posted on the homepage of OGE's website, www.oge.gov. The Director's Notes provide a public-friendly explanation of OGE's role in the executive branch ethics program, ethics rules and regulations, OGE's programs and initiatives, and current ethics issues. In fiscal year 2014, OGE published 21 Director's Notes on important topics, such as the purpose of financial disclosure, OGE's oversight role, and the value of OGE's Conflict of Interest Prosecution Survey. Several of these Notes were mentioned in news media articles, thereby increasing OGE's reach to the public.

OGE also uses social media to broaden its reach to key external stakeholders. Effective outreach helps ensure that the public understands the purpose of the executive branch ethics program. Specifically, OGE uses its Twitter account to drive traffic to substantive ethics content

on its website and to provide information about the executive branch ethics program to the public. In fiscal year 2014, OGE reached out to good governance groups, watchdog organizations, and the media though email campaigns inviting them to follow OGE on Twitter and participate in live-tweeting at the 2014 National Government Ethics Summit. In

How are people connecting with OGE on social media?

Twitter   *YouTube*   *Google+*

Figure 15: Social Media

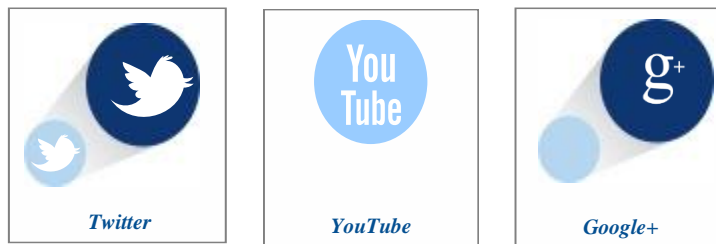addition, OGE expanded its use of social media by creating new Google+ and YouTube pages. OGE used these accounts to live stream Summit sessions.

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of new visitors to OGE's website and the continued growth in the number of its Twitter followers. In fiscal year 2014, the number of first-time visitors to OGE's website increased by five percent over the previous fiscal year. In addition, OGE's followers on Twitter increased 180 percent to 421 followers. In total, 421,739 people visited OGE's website.

Collaborated with and engaged stakeholders

In fiscal year 2014, OGE continued to participate in professional, good government, and interagency groups to discuss emerging ethics issues and trends, share model practices, develop sound ethics policies, and combine resources to more effectively ensure that government decisions are made for the benefit of the public and not private gain. In fiscal year 2014, OGE continued to actively participate as a member of the Ethics and Compliance Officer Association (ECOA), the Council on Governmental Ethics Laws (COGEL), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE). As a member of ECOA and COGEL, OGE shared its legal analysis, programmatic experience, and model practices with the private sector and state and local government agencies by participating in message board discussions, training, and in-person meetings, as well as by responding to direct requests for information. For more information on OGE's involvement with CIGIE, see page 16.

In addition, OGE participated in interagency groups such as the Performance Improvement Council (PIC) and the General Counsel Exchange to share information about OGE and the executive branch ethics program. For example, OGE was asked to participate in a Google+ hangout hosted by PIC to describe OGE's mission and discuss how OGE effectively implemented strategic planning to meets its mission. OGE's involvement with these organizations not only fosters valuable communication, it also leads to innovations in OGE's practices related to training, program and performance management, and general law.

OGE also organized in-person meetings with ethics practitioners and the leadership of good governance and government watchdog groups in fiscal year 2014. For example, OGE met with the President of the Partnership for Public Service to discuss ways that OGE and the Partnership for Public Service could work together to help ensure an effective Presidential

transition. These meetings create opportunities to collaborate and share resources and information that enhance the executive branch ethics program. Further, through OGE-initiated "three branch meetings," OGE continued to collaborate with the most senior ethics practitioners from each branch of government. In fiscal year 2014, OGE conducted three three-branch meetings to exchange information and discuss experiences related to key topics of common interest in the field of government ethics, such as gifts from outside sources, outside employment and activities, and electronic financial disclosure. These meetings resulted in a greater understanding of approaches taken to address common issues and the differences in the role of each branch's ethics program.

To further promote understanding of the executive branch ethics program and its mission, OGE also continued to build relationships with its external stakeholders. For example, OGE accepted speaking invitations to address its external audiences, including members of academia, professional associations, and the Inspector General community, on topics including conflicts of interest, ethical leadership, and enforcement. OGE then leveraged those relationships to bring the expertise of its external stakeholders to its National Government Ethics Summit. Members of good government and government watchdog groups, state and local governments, the media, the international anti-corruption community, and academia attended and presented at the Summit. The organizations that presented at the Summit included the Partnership for Public Service, Public Citizen, Project on Government Oversight, members of academia, Federal News Radio, legislative and judicial branch ethics officials, Ethics Resource Center, private law firms, and the Ethics and Compliance Officers Association. Their attendance at the Summit is a direct result of the efforts OGE has made to build and strengthen relationships with its external stakeholders.

Performance Indicator: In fiscal year 2014, OGE presented to nine organizations.

Responded to requests for information and provided assistance

OGE responds to requests for information and assistance from its external stakeholders on topics such as public financial disclosure, gifts from outside sources, and post-employment. For example, in fiscal year 2014, OGE responded to over 100 requests for assistance from the press. These interactions result in more accurate reporting about the ethics rules and regulations. These interactions also multiply OGE's ability to reach the general public to further promote 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 over 200 requests from public citizens. This assistance promotes understanding of the executive branch ethics program and related ethics rules and regulations.

Requests for Assistance (Non-Agency Audiences)	
Public Citizens	224
Press	116
Congress	20
For-Profit	53
Non-Profit	17
International	26
State/Local	9
Academia	14
Judicial	3

Figure 16: Requests for Assistance

Performance Indicator: In fiscal year 2014, OGE responded to 482 requests from non-government, external stakeholders. See Figure 16. In addition, OGE and the executive branch ethics program were mentioned in 42 media articles during fiscal year 2014.

Shared information with foreign delegations and supported anti-corruption efforts

OGE continued to meet with foreign public and private sector groups through the State Department's International Visitor Leadership Program and similar programs. Through these programs, foreign delegations come to OGE to learn about the executive branch ethics program and how that program fits under the broader rubric of anti-corruption, good governance, and transparency.

In fiscal year 2014, OGE briefed 22 foreign delegations comprising 256 individuals representing 76 countries, as highlighted in Figure 17. Also of note, OGE completed the first stage of a review conducted within the Follow Up Mechanism to the Inter-American Convention against Corruption, known as MESICIC for its Spanish acronym. In 2014, the MESICIC Committee of Experts began reviewing OGE as one of four U.S. anti-corruption oversight bodies, i.e., those that prevent, detect, investigate, and/or punish corruption. In fiscal year 2015 the Committee will conduct a site visit at each of the four U.S. oversight bodies. OGE will then participate in the MESICIC plenary meeting during which the report for the U.S. will be adopted.

Figure 17: Information Sharing with Foreign Delegations

OGE also continued to support U.S. government anti-corruption reporting requirements and good governance goals through a variety of multilateral forums such as the United Nations, World Bank, and Organisation for Economic Co-operation and Development, often at the direct request of the U.S. State Department. Finally, OGE continued to provide information about the executive branch ethics program in response to bilateral requests for assistance in benchmarking and improving anticorruption programs.

Maximized the use of communication tools to increase reach to and engagement with external stakeholders

In fiscal year 2014, OGE refined the way it tracks and analyzes its external communication outreach efforts through website and social media analytics platforms, the Agency Information Management System (AIMS, and other internal tracking mechanisms. These refinements enabled OGE to ensure that it targeted its priority audiences and efficiently used digital communications tools.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to expand its external communications efforts to raise the visibility of the executive branch ethics program generally and OGE's work in particular. Key highlights of OGE's planned work are described below.

Use data to refine communication strategies and tools

To reach and broaden its audiences both within and outside the federal government, OGE will continue to refine its communications tracking systems and analyze the data it gathers. OGE will place a greater emphasis on making data-driven decisions to improve its use of its website, social media accounts, and other communication tools. OGE will also use analytics to better tailor the content of its communications to its external audiences and to identify and remedy gaps in its communications outreach to priority audiences.

Continue to build a culture of information sharing and strategic communication

In fiscal year 2015, OGE's cross-divisional communications team will develop content guidance for OGE employees, including creating standards for consistency within OGE's digital media, and will provide regular communications updates through quarterly reports to management and presentations at agency-wide meetings. These efforts will help OGE employees present important ethics information to OGE's external audiences in a way that is more consistent, accessible, and easily understood.

Expand the reach of OGE communications

Through digital media OGE is able to reach a greater number of people and expand the reach of its communications about the systems in place to protect the integrity of the government. OGE will continue to refine the content that is posted on its website to ensure that it is timely, complete, and being viewed by visitors to OGE's website. OGE will explore ways to assess whether its communications are having the intended impact. OGE will also evaluate, and implement as appropriate, new communications tools to reach priority audiences.

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

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

Timely respond to external requests for information and assistance

OGE will continue to be responsive to requests for information and requests for assistance from its external stakeholders. Through these interactions, OGE aims to increase their understanding of the ethics laws so that accurate information is disseminated about the executive

branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and producing news releases. OGE will also continue to respond to the numerous requests for information it receives from the general public.

Support the United States foreign policy initiatives

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

Strategic Objective 3.2: Ensure that ethics information is publicly available

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

Performance Highlights

Timely made ethics documents available online

In fiscal year 2014, OGE continued to timely make available ethics documents on its website. These documents included public financial disclosure reports and ethics agreements, program review reports on agency ethics programs, reports on payments for travel received from non-federal sources in connection with attendance of employees at certain meetings, and written policy guidance. OGE also continued to use its Twitter account, @OfficeGovEthics, to direct external stakeholders to detailed information on its website and to provide external audiences an additional way to access OGE's latest publications. OGE also used its Twitter account to provide information regarding changes in executive branch ethics laws, regulations, and programs. OGE's making these documents available allows the public to access and review them and to have greater assurance that the systems to identify and resolve conflicts of interest are in place and are effective.

Performance Goal: OGE exceeded its target to timely post 80 percent of ethics documents online within established time frames.
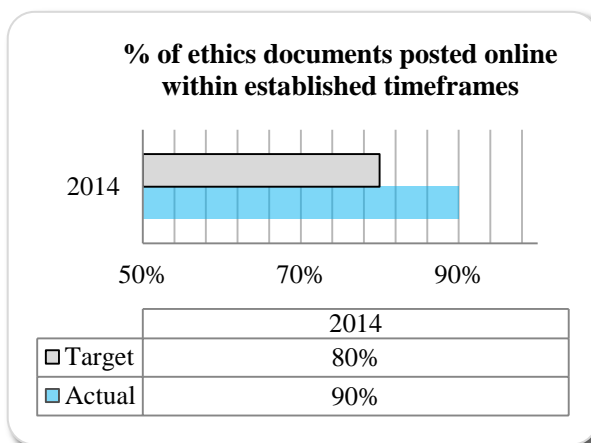
% of ethics documents posted online within established timeframes

	2014
☐ Target	80%
☐ Actual	90%

Figure 18: Posting ethics documents

Analyzed availability of ethics documents

In fiscal year 2014, OGE began an analysis to identify additional ethics documents that could be posted on its website to promote the public's understanding of OGE's mission and the executive branch ethics program. OGE plans to complete this analysis with the goal of augmenting the ethics documents available to the public on its website.

Administered a strong Freedom of Information Act (FOIA) program

In fiscal year 2014, in its annual assessment of agency progress in implementing the Attorney General's FOIA Guidelines, DOJ's Office of Information Policy awarded OGE the highest possible score for having an effective system in place for responding to FOIA requests, increasing proactive disclosures, improving timeliness in responding to requests, and reducing backlogs . OGE received the second highest possible score for applying a presumption of openness in responding to FOIA requests. OGE has continually updated its internal FOIA procedures to conform to the OPEN Government Act of 2007, the President's 2009 Memorandum on the FOIA, guidance issued by the DOJ, and best practices.

Began modernizing OGE's FOIA regulations

In fiscal year 2014, OGE reviewed and drafted revised its regulations to better reflect OGE's current FOIA practices and overall best practices, as well as its current organizational structure. OGE also concurrently participated in an interagency process, led by DOJ's Office of Information Policy, to develop a common set of FOIA regulations that will be applicable to agencies government-wide.

Planned Work for Fiscal Years 2015 and 2016

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision making, in fiscal years 2015 and 2016, OGE will continue to timely post a variety of critical ethics documents on its website, such as agency program review reports and financial disclosure reports of high-level officials. OGE will also continue to respond to FOIA requests and to maintain a strong FOIA program. Key highlights of OGE's planned work are described below.

Expand public availability of ethics documents

OGE will complete its analysis of the ethics documents maintained at OGE to identify additional documents to make publicly available through its website. OGE will post the information in a manner easily understood and accessible by the public.

Pursue modernization of OGE's FOIA regulations

In fiscal years 2015 and 2016, OGE will continue to timely respond to FOIA requests. In fiscal year 2015, OGE will publish the proposed changes to its FOIA regulations in the Federal Register for public notice and comment. OGE will respond to comments received regarding

these proposed changes and will complete its update of OGE's FOIA regulations by publishing a final rule in the Federal Register. OGE will also concurrently continue to participate in the interagency process, led by DOJ's Office of Information Policy, to develop a common set of FOIA regulations that will be applicable to agencies government-wide.

Section IV – Managing for Results

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

Management Objectives

OGE devotes significant resources toward promoting professional development opportunities for its staff and undertaking process improvement. These two efforts are critical to OGE achieving its mission-focused strategic objectives.

Organized by management objective, this section highlights the major accomplishments that OGE achieved in fiscal year 2014, provides data on OGE's success in achieving its management objectives and performance goals during fiscal year 2014, and describes OGE's planned work for fiscal years 2015 and 2016. Information on how OGE will measure its progress toward achieving its management goals in fiscal year 2016 can be found in Appendix A.

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

OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities, as well as support through the dedication of time and resources. In fiscal year 2014, OGE expanded the use of a unique professional development process that OGE developed and piloted in 2013. OGE calls this process the Employee Development Program (EDP).

In some respects, the EDP builds on the Individual Development Plan required by OPM. The EDP incorporates the requirements of OPM's Individual Development Plan but goes further by identifying individual employee learning objectives that must be tied directly to OGE's strategic plan and to the organizational goals of the employee's work unit. The EDP identifies specific formal training, mentoring, self-study, and/or on-the-job training activities that the employee will complete in the covered period. Significantly, the EDP also identifies objective measures for assessing the employee's acquisition of the targeted knowledge or skills. Often, this measurement will involve the employee's completion of a work product or delivery of a presentation related to the training, with the supervisor evaluating the employee's work product or presentation to determine whether the training was effective. This mixture of support and accountability has helped OGE to foster both a performance culture and continuous learning.

Performance Highlights

In fiscal year 2014, all OGE employees participated in the OGE Employee Development Program, as described above. In addition to the EDP, OGE increased employee knowledge through information sharing and collaboration by conducting bi-monthly employee meetings called Issue Forums. Staff met at these forums to discuss a wide range of ethics issues, including in-depth analyses of specific ethics rules and regulations. These forums promoted internal

communication and cross-functional knowledge sharing among employees at all levels and from all divisions. OGE also developed a Persuasive Speaking Community of Practice that met twice a month to allow participating employees to improve their oral communication skills. In addition to these significant investments in internal opportunities for professional development, OGE supported its employees enhancing their knowledge and skills by sponsoring their participation in external training programs. These programs included classes at the Graduate School USA and the Treasury Executive Institute, as well as events hosted by the federal performance, legal, IT, and communications communities.

Finally, OGE redesigned and implemented a new training program for recently-hired OGE attorneys who engage in the practice of ethics law and policy. New attorneys received summaries of key statutory and regulatory authorities along with OGE advisory opinions, case law, Office of Legal Counsel memoranda and relevant exercises to apply each of the authorities. Attorneys read the materials, prepared the exercises and participated in a series of small, intensive-discussion group meetings with OGE instructors. This rigorous combination of independent study followed by small group instruction and discussion gave the attorneys a deeper understanding of the key authorities upon which to build as they gain more on-the-job experience. It also better prepared them to effectively perform their duties of providing advice to agency ethics officials on an array of topics.

Performance Goal: In fiscal year 2014, OGE modified the EDP based on feedback received from employees who participated in the pilot. As a result of their feedback, OGE did not use a measure of confidence to determine if each employee successfully met their professional development goals. Rather, each employee made a commitment to carry out planned activities and participate in the measurement of progress toward the objective. Employees tied their professional development goals to OGE's strategic objectives. During the performance period, 95 percent of employees successfully completed their employee development plan. Moving forward, OGE is working on a common performance standard that will be used across the agency in fiscal year 2015.

Planned Work for Fiscal Years 2015 and 2016

In fiscal year 2015, OGE will incorporate the requirements of the EDP into employees' performance standards. In this way, OGE will solidify its commitment to continuous employee learning and professional development. OGE will also continue to identify agency knowledge and skill gaps, and will use the EDP to train employees to fill those gaps. OGE will also continue to provide significant internal and external training and development opportunities to its employees. OGE will continue to hold regular meetings for employees within the agency to share information and to develop and improve their knowledge and skills. These actions collectively ensure that OGE and its employees will be able to offer the highest quality products and services to its stakeholders.

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

OGE strives for excellence by continuously reviewing and refining its strategies and processes for achieving its mission. As part of this effort, OGE continues to standardize its procedures and review them for ways to increase efficiency and effectiveness.

Performance Highlights

Created standard operating procedures

In an effort to work smarter, in fiscal year 2014, OGE continued to review its processes and procedures for ways to make improvements in programs that both support the ethics community and OGE's internal operations. OGE continued to streamline and standardize internal processes, as well as implement new technology solutions. In fiscal year 2014, OGE developed or updated 20 standard operating procedures. For example, OGE revised its procedures to consolidate the responsibilities of intake, assignment, and tracking of incoming public financial disclosure reports into a single administrative assistant position. The new procedure has allowed OGE to maintain much closer monitoring of reviewer progress, provide a detailed weekly update to the Director, and assign reports to reviewers more quickly.

Additional examples of key new or revised procedures and processes include: a procedure to facilitate consultations between Desk Officers and Attorneys in the Ethics Law and Policy Branch (ELPB) on substantive questions from ethics officials to fully utilize the work performed by both Desk Officers and ELPB Attorneys and to accurately and timely advise ethics officials, an updated Legislative Team Program Guide and Bill Tracking system that resulted in new efficiencies and a paperless process, and an updated process for approving requisitions that builds in additional internal controls and tracking to ensure that OGE remains fiscally responsible.

Performance Goal: OGE exceeded its performance goal to create or revise four standard operating procedures for key agency programs by 20.

Conducted a self-assessment of OGE's ethics and Equal Employment Opportunity programs

OGE encourages all agencies to regularly assess their ethics programs. In fiscal year 2014, OGE conducted a self-assessment of its own ethics program and as a result, updated confidential filer designations and conducted surveys to better tailor its annual ethics training to address areas of relevance to its employees. OGE also conducted a review of its Equal Employment Opportunity (EEO) program to ensure that OGE meets EEO program requirements.

Launched new technology solutions

OGE completed several IT initiatives in fiscal year 2014, such as updating its phone system and replacing antiquated IT equipment. Of particular note, OGE hired an experienced developer to create new web applications and automated tools to improve OGE efficiency. These

web applications and automated tools enable OGE to conduct business with greater efficiency and effectiveness. For example, OGE developed an application for managing logistics for the 2014 National Government Ethics Summit, significantly improving resource-allocation decisions. In addition, OGE is automating and making paperless additional processes such as purchase card approval and transactions, organizational accomplishments, ethics agreements compliance, and online training.

In fiscal year 2014, OGE also began developing a new mechanism for collecting required information such as agency travel reports and annual questionnaires. OGE will deploy a public-facing web server that will permit the electronic submission of data to OGE. This will streamline the data submission process for OGE customers by allowing them to enter required information directly through the website portal, rather than having to email it or use a third party collection platform. This new system will also save valuable staff time by importing data directly into OGE information management systems, eliminating the time required for document handling and reducing errors by ensuring that documents and data are properly stored. In addition, the new system will enable OGE to collect the information in a standardized way that may be easily sorted to better analyze agency data and make informed policy decisions.

Digitized agency records

In fiscal year 2014, OGE began to digitize its paper records and create an electronic file room to conserve resources and streamline OGE's records management process. This enabled OGE to more effectively maintain its records, conduct searches of its records, and timely dispose of records in accordance with the General Records Schedule.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will identify and review at least two processes in each of its four divisions, select at least one of these processes from each division for standardization and streamlining, develop and implement action plans for revising the processes, and deploy the revised processes. OGE will also continue to develop internal applications that streamline current processes and improve OGE's multiple data collection efforts. Improved data collection tools will enable OGE to better analyze data and make informed policy decisions for the executive branch ethics program. In addition, OGE will continue to convert paper records to electronic records to improve maintenance, searching, and disposal.

Maintaining a Culture of Performance

In fiscal year 2014, OGE bolstered its internal communications efforts through a variety of methods. OGE conducted quarterly "all hands" meetings with the entire OGE staff to discuss progress toward meeting its goals and to promote an understanding of OGE's priorities and direction. OGE also held regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities. OGE held supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

In addition to emphasizing internal communications, OGE took several other steps during fiscal year 2014 to maintain a culture of performance. For example, OGE published a new strategic plan covering fiscal years 2014 through 2018, with input from stakeholders in the executive branch ethics community, Congress, good government groups, and the general public. OGE also continued to support a variety of flexible work and telework schedules, with 93 percent of employees reporting they were satisfied with OGE's telework and 100 percent reporting that they were satisfied with OGE's alternative work schedules. Furthermore, OGE updated its Senior Executive Service performance management system and tied employee performance standards to OGE's strategic goals.

To evaluate its progress in maintaining a culture of performance, OGE participated in the executive branch-wide Federal Employee Viewpoint Survey in fiscal year 2014, achieving a 93 percent participation rate. OGE received over 90 percent positive ratings for its management review and evaluation of the organization's progress toward meeting its goals and objectives and for employees being held accountable for achieving results. In addition, the survey results show a 25 percent increase in employees reporting that their supervisor has talked with them about their performance.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2015 and 2016 through several initiatives. OGE will continue to track its progress toward annual performance goals by: holding quarterly all-hands meetings; conducting mid-year strategic objective reviews; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In addition, OGE will continue to support a variety of flexible work and telework schedules. To evaluate its progress, OGE will analyze results from the Federal Employee Viewpoint Survey.

Support of the President's Management Agenda

In support of the President's Management Agenda, OGE is committed to making information resources accessible, discoverable, and usable by the public. However, OGE does not create or collect data sets from which the public could derive the benefits of an Open Data format for manipulation to "fuel entrepreneurship, innovation, and scientific discovery." Rather, OGE performs its mission on a much lower data level (e.g., document level of PDF and basic tracking spread sheets). OGE has a policy of proactively and aggressively providing transparency and accessibility of data collected or created. Currently, releasable data from which the public could derive benefit is provided at the document level, available on the OGE website.

In further support of the President's Management Agenda, OGE continued to use the shared services of the Bureau of Fiscal Services for all of OGE's non-core administrative support services. OGE also worked toward reducing fragmentation, overlap and duplication, and smarter IT delivery through the development of *Integrity,* its electronic public financial disclosure filing system that will be available to all executive branch agencies free of charge. The system is described on page 27. OGE also took steps to improve its ability to make data driven decisions as discussed in Section V of this document on evidence and evaluation on page 47.

Section V – Evidence and Evaluation

OGE is committed to using evidence, evaluation, and data as tools to improve program outcomes. Figure 18 below identifies where in the performance plan relevant information related to these efforts can be found.

Most Significant Accomplishments in Fiscal Year 2014

- Program inspections (See page 12)
- Annual agency reports (See page 13-14)
- Electronic financial disclosure system (*Integrity)* (See page 27)

Highest Priorities Areas for Fiscal Year 2015

- Electronic financial disclosure system (*Integrity)* (See page 29-30)
- Customer satisfaction (See pages 10-11)
- Oversight of executive branch ethics program (See pages 16-18)

Plan for embedding evaluation and improvement in new or existing programs

- Electronic financial disclosure system (*Integrity)* (See page 29-30)
- Leadership support (See page 30-31)
- External outreach efforts (See page 37-39)

Implementation updates for OMB Memo M-14-06, "Guidance for Providing and Using Administrative Data for Statistical Purposes." In consultation with OMB, OGE and OMB jointly concluded that OGE does not have any non-public administrative data for purposes of M-14-06.

Figure 19: Evidence and Evaluation Initiatives

Section VI – Conclusion

OGE will use its fiscal year 2016 budget request to support the agency's important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business with impartiality by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in this justification for fiscal year 2014, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals. Further, as is amplified in this justification, OGE will employ its fiscal year 2016 resources to make significant strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program, contributing to the continuity of senior leadership in the executive branch, and promoting transparency of the executive branch ethics program, and its management goal of creating and promoting a culture of performance.

Appendix A – Fiscal Year 2015 and 2016 Performance Goals

OGE PERFORMANCE GOALS			
Strategic Goal 1: Advance a strong, uniform executive branch ethics program			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 1.1 *Interpret and advise on ethics laws, policies, and program management*	Legal and program advisories help ethics officials perform their job duties.	80%	80%
	Ethics officials believe OGE timely communicates ethics-related information.	Establish baseline	-
	OGE Desk Officer assistance helps ethics officials perform their job duties.	80%	80%
Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within established time frames.	90%	90%

Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	In cases in which OGE identifies program weaknesses, OGE's program review results in improvements in the agency's ethics program.	75%	75%
	Ethics agreement compliance occurs within the established time frame.	90%	90%
	OGE's electronic filing system has capacity to process financial disclosure reports.	Milestone: January 2015	-
	OGE's electronic filing system is processing financial disclosure reports.	Multiple Agencies	30% of public financial disclosure filers 25% of executive branch agencies
Strategic Objective 1.3 *Contribute to the professional development of ethics officials*	Ethics Officials use training products made available by OGE.	80%	80%
	After participating in an OGE training event, ethics officials better understand the subject matter presented.	90%	90%
	After participating in an OGE training event, ethics officials believe they can more effectively perform their job functions.	90%	90%

Strategic Objective 1.4 *Modernize and implement the ethics rules and regulations*	Submit revisions to subparts B and F of the Standards of Ethical Conduct for Executive Branch Employees to DOJ and OPM.	Milestone: 2015	-

Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 2.1 *Provide assistance to the President and the Senate in the nomination process of Presidentially-appointed, Senate-confirmed nominees*	Identifiable, substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination.	90%	90%
	OGE successfully resolves technical reporting issues in the financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination.	90%	90%

Strategic Objective 2.2 *Promote leadership support of the executive branch ethics program*	Agency leaders demonstrate support of the ethics program.	80%	85%
Strategic Objective 2.3 *Support succession planning in the executive branch ethics programs* .	Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.	Establish baseline	-

Strategic Goal 3: Promote transparency of the executive branch ethics program			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 3.1 *Raise the visibility of the executive branch ethics program and OGE.*	Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program.	community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles	. community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles

Strategic Objective 3.2 *Ensure that ethics information is publicly available*	Ethics documents are posted online within established time frames.	80%	80%

Management Objectives			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Management Objective 4.1 *Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities.*	OGE employees participating in the Employee Development Program successfully complete their employee development plans.	Establish baseline	-
Management Objective 4.2 *Transform the way OGE conducts business through process improvement*	Create or revise standard operating procedures for key agency programs.	4	4

Changes to OGE's Performance Goals

The table above reflects OGE's addition of 4 new performance goals for fiscal years 2015 and 2016 and the removal of three performance goals that were used in fiscal year 2014. OGE reviewed its performance goals and changed them to more accurately capture the agency's current work priorities and to ensure that the goals are appropriately outcome oriented. The specific reason for each change is described below.

New Performance Goals Established for Fiscal Years 2015 and 2016

1. *Ethics Officials believe OGE timely communicates ethics-related information:* This performance goal was added to reflect OGE's priority to increase outreach efforts with the ethics community.

2. *Electronic filing system is processing financial disclosure reports:* This performance goal was added to more accurately reflect the targeted development of the electronic filing system in fiscal years 2015 and 2016.

3. *In cases in which OGE identifies program weaknesses, OGE's program reviews result in improvements in the agency's ethics program.* This performance goal was added to better capture the intended outcome of OGE's reviews of agency ethics programs.

4. *Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.* This performance goal was added to capture OGE's overall efforts to support succession planning in the executive branch ethics program.

Performance Goals No Longer in Use for Fiscal Years 2015 and 2016

1. *Ethics officials believe OGE timely addresses new ethics issues:* This performance goal was broadened in new performance goal 1 above because OGE shifted its focus toward whether ethics officials believe OGE is timely communicating on all issues, not just new or emerging issues.

2. *Ethics officials increase their confidence level in one or more skill areas after attending OGE's Intensive Curriculum in Ethics:* This goal was removed because it narrowly focused on a single program aimed a small subset of ethics officials.

3. *Agencies subject to program reviews implement recommendations for improvements and acknowledge the identification of broader systemic weaknesses by OGE.* This performance goal was replaced with new performance goal 3 above to better capture the intended outcomes of OGE program reviews.

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