

CONGRESSIONAL
BUDGET JUSTIFICATION,
ANNUAL
PERFORMANCE PLAN

FISCAL
YEAR
2022

PREPARED FOR THE
COMMITTEES ON
APPROPRIATIONS
MAY 2021

UNITED STATES
OFFICE OF
GOVERNMENT
ETHICS



MISSION

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

The American people expect honest government that works on their behalf, that is transparent, and that responds to the needs of everyday people. With strong leadership and cooperation, the U.S. Office of Government Ethics (OGE) can deliver for the American people, but not without focus and resources.

OGE works tirelessly with agencies across the executive branch to build and retain the public's trust. OGE's mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch is an essential component of the public's confidence in the integrity of executive branch programs and operations. This past year, OGE has taken steps to increase transparency, partner with senior leaders to strengthen ethics across the agencies, and make sure that government leaders have qualified ethics officials to help them navigate their ethical responsibilities.

An investment in ethics, and in OGE, is an investment in government success. This plan is about the essential work OGE will do in the next two years, why that work is crucial to the country's success, and why OGE must be adequately resourced to be able to perform its unique and critical mission.

“THE ISSUE OF ETHICS IN GOVERNMENT IS VIEWED AS A SERIOUS PROBLEM BY ABOUT AS MANY PEOPLE (67%) AS DRUG ADDICTION – THE TOP ISSUE, AT 70%.”

*Pew Research Center
Report on Trust and
Distrust in America,
July 2019*

Table of Contents

Section I – Budget Request Overview	5
Section II – About OGE	12
Section III – Fiscal Years 2021 and 2022 Performance Plan	15
Section IV – Conclusion	46
Appendix A – Fiscal Years 2021 and 2022 Performance Goals ...	47

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – 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 Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act, including services as authorized by 5 U.S.C. 3109, rental of conference rooms in the District of Columbia and elsewhere, the hire of passenger motor vehicles, and not to exceed \$1,500 for official reception and representation expenses, \$20,371,000.”

Budget Request Overview Narrative

In accordance with Office of Management and Budget (OMB) guidance, OGE is submitting a request at \$20,371,000 for fiscal year 2022 to carry out its critical role in safeguarding the public’s trust in government by preventing conflicts of interest. The importance of this work cannot be overstated. Without impartial and ethical decision making, government leaders cannot deliver on their promises, perform their required public duties, or serve this country and its people. Only with the necessary complement of its expert, cross-functional staff and its IT systems working at full capacity can OGE continue to keep pace with its increasing workload and support the needs of the executive branch ethics program.

Funding at the requested level will allow OGE to continue its work and make mission critical investments in vital IT systems, expert staff, and operational stability

BUDGET REQUEST	
FISCAL YEAR 2022	
FY22 REQUEST	\$20,371,000
(1) Workforce	+\$934,000
(a) Retirement costs	\$227,000
(b) Compensation increase	\$599,000
(c) Benefits increase	\$108,000
(2) Systems/Operational	+\$243,000
(a) <i>Integrity</i> operations	\$125,000
(b) Other operational (e.g., shared services)	\$118,000
(3) Cyclical IT Refresh (non-baseline)	+\$618,000

To carry out its vital, mission-critical work, OGE is submitting a budget request of \$20,371,000 for fiscal year 2022. This funding level is necessary to support the staff and IT systems required for OGE to carry out its statutory responsibilities. This funding level supports 75 full-time equivalents, the secure operation and enhancement (\$125,000) of the *Integrity* filing system, and includes a necessary one-time increase for OGE’s four-year cyclical IT refresh (\$618,000). At this funding level, OGE will also be able to implement OMB-mandated payroll increases¹ (\$934,000) and maintain sufficient funds for adjusted increases in operational costs

(\$118,000), such as shared services, rent, utilities and training. Foregoing any of these necessary investments would put OGE employees and operations at risk.

Continued investment in OGE's expert, cross-functional staff, who are necessary to maintain a strong executive branch ethics program, signals support for ethics, and supports public confidence in the integrity of government decision making

Funding at the requested level will allow OGE to absorb OMB-mandated pay increases (\$599,000), increased retirement costs (\$227,000), and benefits increases (\$108,000). OGE’s staff are its most vital resource. OGE requires its full complement of 75 staff working at full capacity to carry out its important mission work and continue to contribute to the continuity of the highest-level senior leadership in the executive branch.

OGE’s budget request directly supports OGE’s mission-critical work, including reviewing public financial disclosures, issuing guidance, providing direct support and training to ethics officials, conducting oversight of agency ethics programs, and providing the public with access to a wide array of ethics documents. For example, OGE has a unique

¹ Including an estimated 2.7% pay raise, mandated 1.1% increase in retirement benefits, and employee award rate of 2.5%, all per OMB guidance.

role in assisting the President and the Senate in the presidential appointment process. OGE’s staff and a handful of others are the foremost experts on executive branch nominee financial disclosure – a process necessary to ensure that government leaders are free from financial conflicts of interest and understand their obligations as individuals and as leaders in their organization’s ethics programs. OGE must have its expert staff available to help protect executive branch agencies and officials from ethical lapses by monitoring senior leaders’ compliance with their ethics requirements. In addition, as the leader of the decentralized executive branch ethics program, OGE must have expert staff available to answer complex questions, provide written guidance, train ethics officials, revise regulations, and provide support to Inspectors General.

OGE needs its full complement of staff to carry out its vital work promulgating, maintaining, and advising on enforceable standards of ethical conduct for more than 2.7 million employees in over 130 executive branch agencies, including the White House; offering education and training to the more than 5,000 ethics officials executive branch-wide; and overseeing a financial disclosure system that reaches more than 26,000 public and nearly 390,000 confidential financial disclosure report filers. OGE also requires its highly cross-functional staff to continue engaging the public in overseeing government integrity. As evidenced by a surprisingly dramatic rise in interest in OGE’s mission and responsibilities from the public and Congress, OGE is responsible to inform the public about the systems in place to ensure public integrity and provide access to the ethics information the public needs to hold their government accountable. An investment in OGE’s staff resources ensures that the important ongoing work of the agency, the executive branch, and the public’s confidence in that work, is preserved.

Examples of OGE’s Cross-Functional Staff

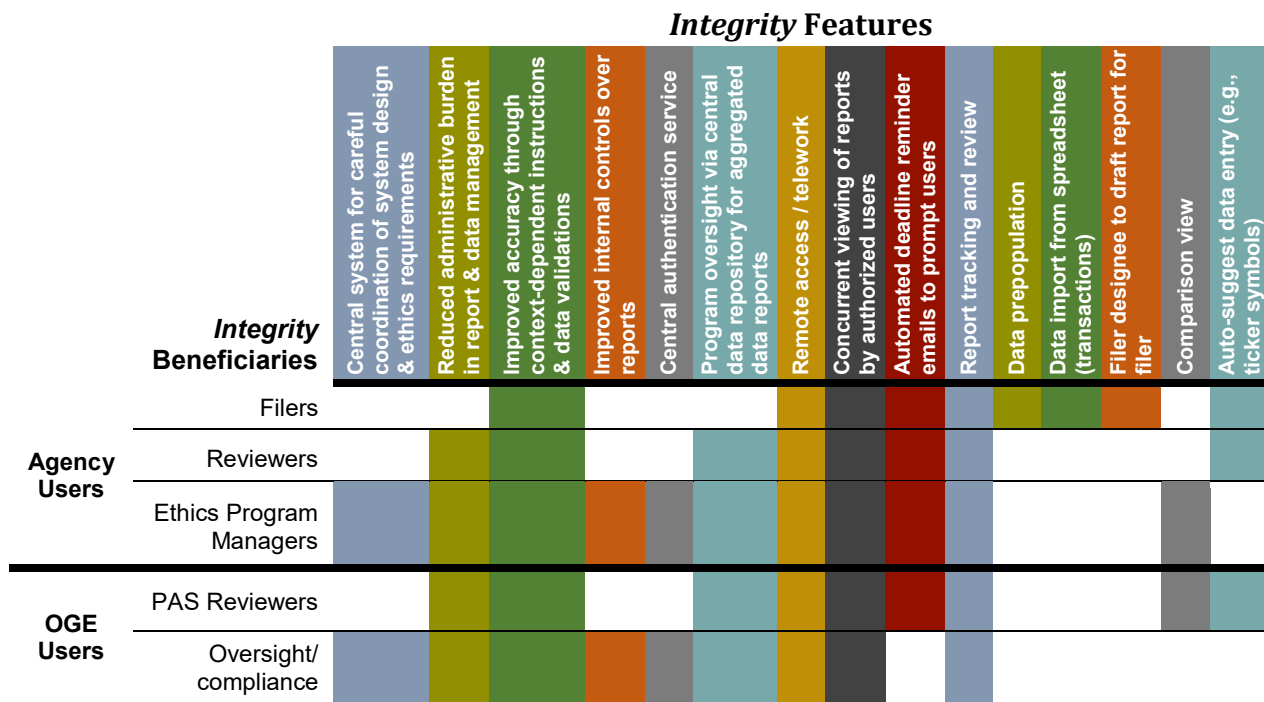
	Legislative	Nominee Financial Disclosure Review	Annual Financial Disclosure Review	Int'l Outreach	Domestic Outreach	Training	Legal Policy and Advice	Agency Desk Officer	Program Review and Compliance	Agency Compliance and Internal Operations
Program Reviewer										
Attorney										
Ethics Specialist										

Continued investment in *Integrity*, OGE’s congressionally mandated electronic public financial disclosure filing system, is necessary to the presidential appointment process and senior leaders in the executive branch

OGE must continue to invest in *Integrity*, its executive branch-wide electronic financial disclosure filing system. *Integrity* has revolutionized the process of filing public financial disclosure reports for the highest-level officials in the executive branch. A secure,

web-based system that consistently receives over 90% satisfaction rates, *Integrity* has improved the accuracy and efficiency of this complex filing process. With over 23,000 current filers using the system, *Integrity* improves filing accuracy through the use of wizards, and enables electronic review, routing, and signature of the reports. OGE provides this shared quality service at no cost to agencies, saving government resources, increasing efficiency, and decreasing duplication and fragmentation across the executive branch.

In fiscal year 2022, the demands on the system will continue to increase as a result of the presidential transition and the demand to fill vacant leadership positions in the executive branch. Funding to support system upgrades is necessary to keep *Integrity* current, secure, and operating at peak efficiency, which is in turn vital to the success of the presidential appointment process and the executive branch-wide public financial disclosure program. For example, OGE must update the programming language used by *Integrity* for database queries as part of a technical refresh in fiscal year 2022. In addition, OGE must update *Integrity* to seamlessly switch users among servers as they use the system to ensure the multiserver architecture works effectively for users. Funding at OGE’s request level would cover the costs of these required updates and provide needed funding for contingencies, such as bug fixes, and regular, planned system upgrades that keep *Integrity* operating securely and efficiently.



An investment in OGE’s every four-year IT refresh is critical to mitigate operational risks to OGE’s operations and mission

In fiscal year 2022, OGE must replace its information technology infrastructure and associated equipment because they will reach the end of their intended lifecycle, creating untenable risks to OGE’s ability to carry out its daily, mission-critical work. OGE must

upgrade its IT infrastructure to mitigate the risk of potential failure and to adapt to evolving virtual demands and security threats that constantly change and increase in complexity. Beyond just OGE's vital day-to-day operations, OGE must ensure a safe and secure technical environment that protects the privacy and integrity of the sensitive information provided to OGE by agency ethics officials and the most senior officials of the executive branch. OGE must invest in up-to-date solutions to remain proactive in ensuring that any threats are reduced and mitigated, if not eliminated.

To support this necessary effort, OGE is requesting \$618,000 in funding for required upgrades to its network infrastructure, laptops, related peripherals, and software. This request does not represent a permanent increase in OGE's baseline budget, but a single year increase that is needed only every four years. OGE's last IT refresh occurred in fiscal year 2018. Given the fast pace of information technology changes, the increasing reliance on technology for agency operations, and need to operate in a fully virtual environment, this cyclical upgrade is vital to mitigate risk and ensure the stability of OGE's mission-critical operations. Additional details regarding the IT refresh can be found on pages 43 – 43.

Funding OGE is investing in an agency that is an excellent steward of taxpayer resources

In fiscal year 2022, OGE will remain an excellent steward of taxpayer resources by continuously improving how the agency accomplishes its work, demonstrating strong performance, and supporting an engaged and accountable workforce. The requested \$20,371,000 will be used to maximize the reach and impact of OGE's critical work. OGE will continue to seize opportunities to leverage resources and technology to achieve savings in administrative costs associated with a wide variety of its mission work – something OGE has been able to do with great success. Notable achievements include:

- using the MAX.gov platform to operate OGE's executive branch-wide electronic filing system;
- delivering highly effective, low-cost virtual training; leveraging online audio/visual capabilities to conduct a well-received, low-cost government-wide National Government Ethics Summit;
- developing highly efficient internal information system applications and agency-wide electronic records storage to increase accountability and efficiency;
- leveraging executive branch-wide forums and resources to mitigate risk and increase performance data;
- harnessing free social media tools to improve public engagement;
- increasing the data sets available to measure performance; and
- improving transparency by increasing the content and capacity of OGE's website with a massive redesign effort.

OGE will continue to focus on efficiency, continuous improvement, and accountability.

Even with its proven track record of fiscal responsibility, OGE will need to be able to meet required increases (\$118,000) in overhead such as rent, utilities, and shared services providers in fiscal year 2022. Funding at the requested level will allow OGE to meet these increases without a corresponding negative impact on its mission programs and staffing.

Conclusion

OGE requires its full requested funding level of \$20,371,000 for fiscal year 2022 to undertake its important mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch. This mission is an essential component of the public's confidence in the integrity of executive branch programs and operations. Without it, the risk of ethical failures across the executive branch increase. Funding OGE at its full request level will allow OGE to continue its important executive branchwide work with the necessary expert staff, secure electronic filing system, and necessary IT infrastructure to carry out its mission-critical responsibilities.

Budget Request by Object Classification

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

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

	<u>Object Class</u>	<u>2020 Enacted</u>	<u>2021 Enacted</u>	<u>2022 Request</u>
11.1	Salaries	\$9,353	\$9,862	\$10,352 ^A
12.1	Benefits	\$2,861	\$3,177	\$3,597 ^B
21.0	Travel	\$5	\$5	\$5
22.0	Transportation (Freight)	\$1	\$3	\$1
23.1	Rental Payments to GSA	\$1,417	\$1,434	\$1,648 ^C
23.3	Comms and Utilities	\$120	\$93	\$77
24.0	Printing/Reproduction	\$87	\$86	\$77
25.2	Other Services	\$3,524	\$3,767	\$3,838 ^D
26.0	Supplies and Materials	\$87	\$69	\$72
31.0	Equipment	\$45	\$104	\$704 ^E
99.00	Subtotal	\$17,500	\$18,600	\$20,371
99.00	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$18,225	\$19,325	\$21,096
	FTEs	77	76	75

^A Includes 2.7% pay increase per OMB guidance.

^B Includes mandated retirement increases per OMB Circular A-11.

^C Reflects DC tax escalation on office rental space.

^D Includes *Integrity* enhancements described in narrative.

^E Includes cost of once every four years, life-cycle replacement of IT equipment.

Section II – 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, which is 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 General Principles of Ethical Conduct for Government Officers and Employees provides that “Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.”

Each day, some part of the ethics program is at work in every agency in the executive branch. The program ensures that executive branch leaders are aware of their ethical obligations and role in creating an ethical culture in their organizations as they begin government service. It ensures that public servants at all levels remain free from conflicts of interest and even the appearance of conflicts of interest, as they carry out the responsibilities the American people have entrusted to them. It ensures that employees who are seeking to leave the government avoid conflicts of interest and, after they leave, ensures that they do not exercise undue influence over their former agencies on behalf of others. Above all, it is working to protect the public’s trust in government.

Institutional Integrity in the Executive Branch

The Ethics in Government Act charges OGE with leading the effort to prevent conflicts of interest in the executive branch. OGE undertakes this important prevention mission as part of a framework comprising executive branch agencies and entities whose work focuses on institutional integrity. In addition to government ethics, this framework includes merit system protections in the civil service; full and open competition in



Figure 1: Institutional Integrity

procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

Within this framework, the ethics program works to ensure that public servants carry out the governmental responsibilities entrusted to them with impartiality, and serve as good stewards of public resources. Toward these goals, the mission of the ethics program centers on preventing conflicts of interest and the appearance of

conflicts of interest that stem from employees’ financial interests, business or personal relationships, misuse of official position, official time, or public resources; and the receipt of gifts. Taken together, the systems in place to identify and resolve conflicts of interest establish a foundation on which to build and sustain an ethical culture in the executive branch.

OGE and Executive Branch Agencies: A Shared Responsibility

The executive branch ethics program is a shared responsibility. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. The head of each agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.



Figure 2: OGE and the Executive Branch

The agency head is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. Each agency's employees, supervisors, human resources officials, and Inspector General also play a significant role in maintaining the integrity of government programs and operations.

How OGE Leads and Oversees the Ethics Program

To carry out its vital leadership and oversight responsibilities for the executive branch ethics program, OGE:

- promulgates, maintains, and advises on enforceable standards of ethical conduct for more than 2.7 million employees in over 130 executive branch agencies, including the White House;
- offers education and training to the more than 5,000 ethics officials executive branch-wide;
- operates and maintains *Integrity*, a public financial disclosure management application required by the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge (STOCK) Act of 2012;
- oversees a financial disclosure system that reaches more than 26,000 public and nearly 390,000 confidential financial disclosure report filers;
- monitors executive branch agency ethics programs and senior leaders' compliance with applicable ethics laws and regulations;
- prepares for presidential transitions and provides assistance to the President and Senate in the presidential appointments process;
- conducts outreach to the general public, the private sector, and non-governmental organizations;
- and makes ethics documents publicly available.



Figure 3: OGE Organizational Chart

OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, and other key personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE is led by a Director who is confirmed by the Senate and appointed to a 5-year term by the President. As shown in

the organizational chart in Figure 3, in addition to the Office of the Director, OGE is divided into four divisions that work together to carry out OGE’s mission.

Long-Term Strategic Goals



Figure 4: Strategic Goals and Objectives Framework

The public can have greater confidence in the integrity of executive branch programs and operations when government decisions are made free from conflicts of interest. OGE’s four strategic goals for fiscal years 2018 through 2022 – uniformity, accountability, continuity, and engagement – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest.

Section III – Fiscal Years 2021 and 2022 Performance Plan

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

Organized by strategic goal and objective, this section describes OGE's planned work for fiscal years 2021 and 2022. Information on how OGE will measure progress toward achieving its strategic goals can be found in Appendix A.

Priority Work

OGE's budget request directly supports OGE's mission-critical work, including providing direct support and training to ethics officials, refining and issuing guidance, conducting program reviews, reviewing public financial disclosures, and providing the public with access to a wide array of ethics documents. Beyond its crucial ongoing work, OGE has identified the following planned work as priorities in fiscal years 2021 and 2022:

- ❖ Pre and Post-Election Readiness – see page 30 for more information.
- ❖ Increased Financial Disclosure Responsibilities During a Presidential Transition – see page 32 for more information.
- ❖ IT Infrastructure – see page 43 for more information.

Significant External Factors

OGE's planned work assumes adequate levels of fiscal and human resources. From experience, OGE knows that the agency will face certain external factors and, to the extent possible, has factored those into this plan. For example, prior to and immediately after the election of a new President, OGE experiences more than a doubling of its workload for reviewing financial disclosure reports of nominees requiring Senate confirmation. This requires OGE to shift resources to support the Administration in the Senate confirmation process. The rate of confirmations by the Senate also affects OGE's workload.

However, OGE notes an additional external factor which has not been accounted for in this planned work. There are numerous bills pending before Congress that would remake OGE and/or the ethics program. If enacted, any of these changes would have a significant impact on OGE's planned work for fiscal years 2021 and 2022.

STRATEGIC GOAL



ADVANCE A STRONG, UNIFORM EXECUTIVE BRANCH ETHICS PROGRAM

Every day, thousands of dedicated public servants work to protect the executive branch from ethical lapses and failures. When their efforts at prevention fall short, agencies can be crippled by scandal, the public's trust can be eroded, important work may be delayed or derailed, and leaders may be forced from office.

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE has developed three objectives:

- (1.1) Provide expert guidance to stakeholders,
- (1.2) Strengthen the expertise of ethics officials who are integral to the executive branch ethics program, and
- (1.3) Continuously refine ethics policy and issuing interpretive guidance.

Without expert guidance, agencies and their leaders are left to best-guess at the solutions to complex ethical dilemmas, with little or no consistency across the executive branch. Without well-trained ethics officials, agency leaders and employees are deprived of counsel that can help them manage risks. Without timely guidance, emerging challenges go unaddressed.

Some of OGE's most vital work is supporting ethics officials to ensure that they properly understand and are able to implement the ethics laws and policies that OGE issues and interprets.

Strategic Objective 1.1: Provide expert guidance to stakeholders

OGE strengthens uniformity by providing expert guidance and support to stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. In fiscal years 2021 and 2022, OGE will continue to provide quality Desk Officer services and effective assistance to a wide variety of key stakeholders, including Congress and Inspectors General. OGE will also continue to disseminate relevant information and create opportunities for ethics practitioners to engage with OGE and each other. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to respond to questions timely, leaving agency employees and leaders without protection from ethics risks.
- OGE is unable to consult with Inspectors General, delaying investigations while ethics violators remain in positions of public trust.

Assist and support agency ethics officials

OGE continues to provide extensive support to agency ethics officials so they can provide uniform and effective ethics guidance to the more than 2.7 million federal employees in the executive branch who serve the American people. This support includes providing timely, expert advice on applying the ethics laws and regulations, as well as furnishing other resources ethics practitioners need to do their jobs effectively. On average, OGE Desk Officers respond to 1,600 calls for assistance per year (see page 22). Desk Officers help ethics officials navigate difficult policy and programmatic issues and proactively provide those officials with resources and services to assist them. In fiscal year 2022, OGE will create new resources for ethics officials to assist them in administering key parts of their program and in reducing the risk of ethical violations, such as templates for



Maintaining federal ethics standards key to pandemic response, Office of Government Ethics says.



Ethics dos and don'ts for federal employees working through the pandemic | Federal News Network
[federalnewsnetwork.com](https://www.federalnewsnetwork.com)

collecting delinquent financial disclosure reports. These types of resources can be especially helpful to agencies whose officials perform ethics as a collateral duty.

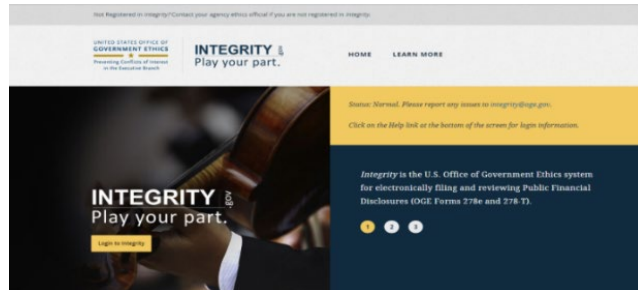
Ensure ethics officials have necessary, up-to-date information to carry out effective programs

OGE continues to provide ethics officials with up-to-date ethics information so that they can carry out effective programs for the employees they serve. OGE continues to publish advisories and other guidance in a searchable format on its website, and provide notices of new guidance via the OGE listserv, which reaches approximately 3,500 ethics officials. OGE also continues to host quarterly meetings with senior agency ethics officials to inform

them of new guidance, resources, requirements, and trends, as well as to provide them with an opportunity to engage with each other.

Support public financial disclosure using Integrity

OGE continues to provide high-quality support to agencies using [Integrity](#), OGE's executive branch-wide electronic public financial disclosure filing system. In addition to helping incoming presidential nominees—many of whom have extremely complex financial disclosure filings—more accurately and easily complete



their disclosures, the system has enabled the executive branch to seamlessly continue the public financial disclosure process throughout the COVID-19 pandemic. During the pandemic, the value of *Integrity* has been even more apparent, when virtual access has been essential and public trust has mattered most. To support the system's more than 30,000 users (filers, administrators, and reviewers), OGE will continue to provide centralized real-time help desk services and on-demand user resources. OGE will also continue to make available training and tutorials, and provide regular training opportunities for both new and experienced users. Additional information about *Integrity* and its pre- and post-election work can be found on page 34.



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OGE's responses to congressional inquiries support government accountability. Read them here:

oge.gov/web/oge.nsf/Co...

OGE responded to over 250 requests for such assistance.

Respond to requests for technical assistance

OGE continues to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, uniform understanding of the executive branch ethics program. In fiscal year 2020,

Support the vital work of the ethics enforcement communities



OGE continues to support the vital work of the ethics enforcement communities, including Inspectors

General, the Department of Justice, and executive branch employee relations personnel, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules.



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We regularly consult with OIGs to help them understand the ethics rules that may be implicated in their investigations.

OGE continues to respond to extensive requests for expert consultations, as well as participate actively as a member of the Council of Inspectors General on Integrity and Efficiency ([CIGIE](#)). Additional information on the training OGE provides to the enforcement communities is on page 21.

Support United States foreign policy initiatives

Finally, at the request of U.S. foreign policy agencies, OGE continues to provide its expertise through participation in international programs designed to support and enhance U.S. foreign policy initiatives in the areas of anti-corruption and good governance. OGE also continues to assist foreign delegations sponsored by the State Department, providing information about U.S. implementation of ethics and good governance programs. In June 2021, OGE will participate in the United Nations General Assembly [Special Session Against Corruption](#). OGE will work with the State Department and other agencies with an anti-corruption mission to determine priorities for the session, which will include emphasizing OGE's prevention mission.

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

OGE seeks to strengthen the expertise of officials who are integral to carrying out an effective executive branch ethics program, including agency ethics officials, agency leaders, Inspectors General, and human resources professionals. In fiscal years 2021 and 2022, OGE will continue to provide professional development opportunities, promote ethical leadership, and provide training to support an ethical workforce. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to train new ethics officials, leaving agencies without competent counsel.
- OGE is unable to deliver orientations for newly designated agency ethics officials, leaving senior ethics officials without guidance needed to successfully lead their programs, placing the ethics program at risk.

Conduct critical training and professional development for ethics officials

To promote uniform implementation of agency ethics programs, OGE provides intensive training for new agency ethics leaders (DAEOs and ADAEOs), as well as comprehensive education resources for ethics officials at all experience levels, including seasonal, on-



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OGE has created resources to help ethics officials conduct ethics training remotely. You can see OGE's suggestions for training new employees here:

extapps2.oge.gov/Training/OGETr...

development. OGE will continue to review and update its education library in fiscal years 2021 and 2022.

OGE continues to conduct orientations for new agency ethics leaders, including targeted, intensive training for ethics officials in critical roles, and hold workshops to create opportunities for ethics officials to collaborate.

U.S. OGE @OfficeG...

Yesterday, OGE hosted a group of new senior ethics officials from across the executive branch to discuss the importance of their work protecting the trust of citizens in their government.



U.S. OGE @OfficeGovEt...

Today, OGE hosted a virtual briefing to help ethics officials prepare their agencies' ethics programs for a presidential election year.

- ✓ OGE also supports the development of ethics officials through its [Institute for Ethics in Government Education Library](#). OGE's virtual library includes more than 100 education resources designed for use by ethics officials, including recordings of training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity. OGE encourages ethics officials to use these resources to create self-paced curricula for their professional

Encourage and support ethical leadership throughout the executive branch

Ethical culture begins with demonstrated ethical leadership throughout an organization. To advance a consistently strong program, OGE seeks opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE engages with senior leadership directly and indirectly through meetings, external communications, and involvement in nominee financial disclosure reports and ethics agreements, as well as through publications and educational offerings.

In fiscal years 2021 and 2022, OGE will continue to provide briefings to new Senior Executive Service members about the

importance of ethics and their vital role in maintaining the public’s trust, as well as share trainings and tools targeted to supervisors regarding their roles and responsibilities as ethical leaders. Finally, through ongoing research and partnerships with others, OGE shares tools and tactics for leaders to use to effectively communicate the ethical expectations for their organizations.

Provide resources to support an ethical federal workforce

OGE recognizes that maintaining strong ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. To support the ethical service of all executive branch employees, in fiscal year 2022, OGE will review and refresh its collection of training resources for new and current federal employees, creating samples for ethics officials to use when communicating about ethics within organizations. OGE will also continue to identify and leverage opportunities to directly discuss ethical standards with groups of federal employees.



Provide training to enforcement and human capital communities

In support of OGE’s goal of a strong, uniform ethics program, OGE continues to train and collaborate with members of the ethics enforcement communities. OGE will continue to provide training as part of the Inspector General Criminal Investigator Academy’s Public Corruption Investigations Training Program (PCITP) and present at meetings of the Council of Counsels to the Inspectors General.

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

OGE’s guidance enables ethics officials to provide more uniform implementation of the ethics program executive branch-wide and provide consistent guidance to their employees, thereby reducing agency risk. In fiscal years 2021 and 2022, OGE will continue to review, refine, and issue interpretive guidance on the ethics rules to ensure their

Consequences of Underresourced Ethics:

- OGE is unable to issue guidance, particularly on new and evolving ethics issues, resulting in inconsistency and confusion across the executive branch on ethics policies.
- OGE is unable to timely update ethics regulations, leaving outdated and less effective rules in place and delaying reforms that would improve ethics policies.

continued relevance, consistency, and effectiveness. Key highlights of OGE’s planned work are described below.

Provide timely ethics guidance

So far, in fiscal year 2021, OGE has issued guidance on topics including crowdsourcing, book deals, inaugural events, and implementation of Executive Order 13989, Ethics Commitments by Executive Branch Personnel. In fiscal years 2021 and 2022, OGE plans to issue advisories that provide additional interpretive guidance on Executive Order 13989, as well as on topics including social media, legal expense funds, and post-employment. In developing these advisories, OGE will continue to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance. OGE will use its listserv, website, Desk Officer services, and training broadcasts to ensure its guidance is widely disseminated.

Publish proposed and final ethics rules

In fiscal year 2021 or fiscal year 2022, OGE expects to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards) by publishing both a proposed regulation and a final rule. The proposed amendments seek to update the Standards based on OGE’s experience gained from application of the regulation since its inception and also incorporate past interpretive guidance, add and update regulatory examples, improve clarity, update citations, and make technical corrections. OGE will also publish both a proposed regulation and a final rule to further modify the Standards to address the conditions under which an executive branch employee may accept a gift of legal expenses.



In fiscal year 2022, OGE will continue its in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions. OGE plans to publish a proposed rule amending the regulatory exemptions at 5 CFR part 2640. In fiscal years 2021 and 2022, OGE will continue to consult with agencies to publish agency-specific supplemental ethics regulations that tailor ethics program requirements to meet specific agency needs. OGE will also publish regulations to establish separate agency component designations applicable to the post-employment statutes.

STRATEGIC GOAL



HOLD THE EXECUTIVE BRANCH ACCOUNTABLE FOR CARRYING OUT AN EFFECTIVE ETHICS PROGRAM

Today, there is a functioning ethics program in each of the more than 130 agencies across the executive branch. When a program fails to prevent an ethics violation, that agency can be crippled. A scandal can delay initiatives, void contracts, slow reforms, and oust leaders. An agency may spend months, or even years, mired in an investigation, congressional hearings, and litigation. Ethics failures erode the trust between Americans and their government, resulting in less support, more suspicion, and reductions in cooperation and compliance. When an ethics program fails, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective executive branch ethics program, OGE has developed two strategic objectives:

- (2.1) Monitor agency compliance with executive branch ethics program requirements, and
- (2.2) Monitor senior leaders' compliance with individual ethics commitments.

If agencies are not held accountable for maintaining compliant ethics programs, systemic problems may multiply. If senior leaders are not held to their individual ethics commitments, the public cannot be certain that the government and its leaders are acting in their interest. Without accountability, the entire system is at risk.

OGE is constantly working to improve its oversight function to better prevent ethical failures. Doing so requires people, time, and technology. Only if properly resourced can OGE best protect the government from ethical lapses.

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

OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at each agency, as well as to identify executive branch-wide trends. In fiscal years 2021 and 2022, OGE will continue to conduct reviews of agency ethics programs and collect data about each

Consequences of Underresourced Ethics:


- OGE is unable to ensure that agencies are maintaining compliant ethics programs, leaving systemic problems unaddressed and agency programs vulnerable to ethical lapses and scandal.

agency's program and the overall executive branch ethics program. OGE also will continue to request ethics program data from agencies to address in real time issues that require oversight. Key highlights of OGE's planned work are described below.

Conduct agency ethics program reviews

OGE conducts agency ethics program reviews as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch. In fiscal years 2021 and 2022, OGE will continue to implement its new risk-based approach to conducting these reviews, using data and stakeholder feedback to assist in identifying agencies and specific issues to review.

ETHICS PROGRAM INSPECTION REPORT		
Agency:		
Report No.:	Date:	
Period Covered by Review:		



UNITED STATES OFFICE OF
GOVERNMENT ETHICS
Preventing Conflicts of Interest
in the Executive Branch

1.0 AGENCY DATA		
EMPLOYEES		
1.1	Number of full-time agency employees.	(From Engagement. Quest.)
1.2	Number of Presidentially appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	(From Annual Quest.)
1.3	Number of non-PAS public financial disclosure reports required to be filed.	(From Annual Quest)
1.4	Number of confidential financial disclosure reports required to be filed.	(From Annual Quest)
ETHICS PROGRAM		
1.5	Title of Designated Agency Ethics Official (DAEO).	(From Engagement. Quest.)

OGE reviews agency programs to identify and report on the strengths and weaknesses of the program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. Cabinet agencies and other agencies determined to be at high risk based on OGE's risk assessment are reviewed every

four years. Other agencies are reviewed at least once every five years. If needed, OGE will also conduct real-time consultations and other compliance-based interventions.

OGE examines all elements of an agency ethics program including: program administration, financial disclosure, education and training, ethics counseling, agency-specific ethics rules on outside employment, conflict remedies, enforcement, and special government employees. OGE conducts appropriate follow-up reviews to evaluate agencies' progress in implementing any recommendations made in OGE's program review reports. To enhance transparency and accountability, OGE continues to publish all program reviews and follow-up program reviews on its website.




Collect and publish ethics program data


As part of OGE's oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects this data through its Annual Agency Ethics Program Questionnaire. In fiscal years 2021 and 2022, OGE will continue to seek 100 percent agency compliance with this requirement and rigorously review agency responses. OGE will continue to build capacity to analyze trend data to identify areas of concern at individual agencies and across the executive branch. In fiscal years 2021 and 2022, OGE will also continue its practice of publishing a report of the aggregate data and posting individual agency responses on its website to increase transparency and oversight. Lastly, OGE will continue

to use the data to provide training on the results, to encourage agencies to use the questionnaire as a tool both to self-assess and to benchmark their agency against similarly situated agencies.

In addition, in fiscal year 2021, OGE will hold its

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We hold agencies accountable by requiring them to provide extensive data on their ethics programs annually. We help citizens do the same by publishing the results. #transparency oge.gov/web/oge.nsf/An ...

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next triennial data call for agency practices. The results of this data call provide OGE with insight into each agency's implementation of a key element of their ethics program. OGE

uses the results to tailor the support it provides to agencies. OGE also shares the results with executive branch ethics officials so they can learn from other practitioners. OGE will also make the results of the data call available to the public in a summary report that will be posted on its website.

OGE also continues to serve as the repository for biannual reports (1353 Travel Reports) that document payments of travel accepted from non-federal sources. Although OGE has no role in providing guidance on the travel regulations, OGE makes these reports available as required by statute.

Collect information on potential ethics violations by executive branch employees

Agencies are required to concurrently notify OGE's Director when referring any matter to the Department of Justice involving a potential

violation of a criminal conflict of interest law by an executive branch employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action in the event prosecution is declined. While OGE primarily works to give the public reasons to trust their government, OGE also acknowledges when officials violate that trust. For example, OGE annually publishes a survey of ethics-related prosecutions, which shows the consequences for failing to abide by the ethics laws and regulations. For the first time in fiscal year 2020, OGE published data regarding these referrals. In fiscal years 2021 and 2022, OGE will continue to post quarterly dashboards displaying information regarding referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.



The Department of Justice has the power to prosecute individuals who violate ethics and conflicts laws. Read about recent prosecutions in OGE's annual Prosecution Survey here: oge.gov/Web/oge.nsf/Le ...

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

OGE monitors senior leaders' compliance with their individual ethics commitments to ensure that executive branch officials conduct the government's business impartially. In fiscal years 2021 and 2022, OGE will continue to monitor agency leaders' compliance with their ethics agreements and provide a

Consequences of Underresourced Ethics:

- OGE is unable to ensure that senior leaders have timely complied with their ethics commitments, decreasing public confidence that their decision making is in the best interest of the government and is not being driven by their personal financial interests.
- OGE is unable to timely review and certify public financial disclosure reports, leaving potential conflicts of interest unaddressed and leaders vulnerable to inadvertent criminal violations.

second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's planned work are described below.

Monitor incoming agency leaders' compliance with their commitments to resolve conflicts of interest

OGE continues its efforts to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office by monitoring compliance with the commitments in their ethics agreements. OGE will continue to collect a Certification of Ethics Agreement Compliance from each appointee, which requires a personal attestation of compliance with the terms of their ethics agreement.

In fiscal year 2021, OGE revised the Certification to reflect the revocation of [Executive Order 13770](#) and the implementation of [Executive Order 13989](#). Other revisions included clarifying one of the recusal requirements, adding a Privacy Act Statement, and including a reminder for PAS officials of their personal responsibility to timely comply with the terms of their ethics agreements. OGE expects the number of certifications to increase due to the surge of new PAS officials filling positions in the new Administration.

In support of transparency and accountability, OGE continues to post these certifications, as well as notices of late compliance and extensions, on its website. In the event a PAS official is more than 30 days late in submitting their Certification or submits a Certification that indicates a substantive deficiency in complying with the terms of their ethics agreement, OGE will, as appropriate, notify the Senate committee of jurisdiction.

Provide expert, second-level review of periodic and annual financial disclosure reports of appointees at the highest-level executive branch positions

OGE continues to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements. In fiscal year 2020, OGE closed nearly 2,100 reports. In fiscal year 2021, this number will likely increase, due to the expected departures of PAS nominees following the election. OGE will provide each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act, including the requirement to timely submit reports to OGE and to promptly provide any additional information necessary for OGE to certify the reports. Lastly, OGE will continue to provide the public with timely access to these disclosures on its website, as described on page 38.

Review requests for Certificates of Divestiture

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain

individuals may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. OGE continues to review requests for CDs and make them available electronically through the OGE Form 201 request process. In fiscal years 2021 and 2022, this number is expected to increase due to the surge of PAS nominees.

Consult with agencies regarding the issuance of waivers to the primary criminal conflict of interest law, 18 U.S.C. § 208

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

STRATEGIC GOAL



CONTRIBUTE TO THE CONTINUITY OF SENIOR LEADERSHIP IN THE EXECUTIVE BRANCH

The country is at its most vulnerable in the period immediately following a Presidential election. It is essential to the country's safety and security that the President is able to quickly nominate and appoint new leaders in executive branch agencies. It is essential that the Senate is timely assured by OGE that nominees can remedy potential conflicts of interest so they may exercise the full authorities of their positions if confirmed.

To achieve its strategic goal of contributing to the continuity of senior leadership in the executive branch, OGE has developed two strategic objectives:

- (3.1) Prepare for a Presidential transition, and
- (3.2) Provide assistance to the President and the Senate in the Presidential appointment process.

Failing to effectively prepare and assist the President and the Senate in the Presidential appointment process can result in critical leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk.

OGE is constantly working to more efficiently review increasingly complex financial holdings to identify and remedy conflicts of interest for incoming senior leaders. Through its dedicated and expert staff, high-quality training and resources, and the application of secure technology, OGE strives to successfully carry out its role in the Presidential appointment process.

Strategic Objective 3.1: Preparing for a presidential transition


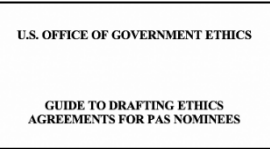
OGE has a unique and important role in the change in top executive branch political leadership. As a result, OGE must focus significant resources on preparing for the possibility of new executive branch leadership after a presidential election. In fiscal year 2020, to prepare for the high turnover that results following a presidential election, irrespective of outcome, OGE participated in federal transition councils, collaborated with other transition service providers, updated necessary resources, published guidance, and provided training on post-election topics. OGE also continued to work with the representatives of presidential candidates in connection with their financial disclosure reports and provided support to presidential campaigns to lay the groundwork for its successful work in fiscal years 2021 and 2022. Key highlights of OGE’s planned work, are described below.

Consequences of Underresourced Ethics:

- OGE is unable to prepare for presidential transition, resulting in delayed nominations and agencies without leadership.

Share key transition resources

Prior to and after the election in fiscal year 2021, OGE shared the valuable resources described below with the campaigns and the transition team.

<p>Transition Guide</p>	<p>The Transition Guide is a resource for the Presidential Transition Team to prepare for the upcoming transition so that top leadership positions can be filled quickly and free from conflicts of interest.</p>	
<p>Guide for Nominees</p>	<p>The Guide for Nominees is a resource for presidentially appointed, Senate-confirmed (PAS) nominees. The Guide provides prospective and current Senate-confirmed presidential appointees with information to help them lead our country with honor and integrity. The Guide explains the ethics rules and policies that apply before, during, and after they serve.</p>	
<p>Ethics Agreement Guide</p>	<p>The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements for PAS nominees.</p>	
<p>Integrity User Guide</p>	<p>The Integrity User Guide provides instructions for using <i>Integrity</i>, the web-based system developed by the U.S. Office of Government Ethics (OGE) for Filers and Reviewers of executive branch public financial disclosure reports (OGE Form 278e and OGE Form 278-T).</p>	

Engage and serve on government-wide transition councils

OGE actively participated in federal transition councils, including the [Agency Transition Directors Council](#), which was responsible for coordinating transition activities among the Executive Office of the President, agencies and departments, the campaigns of eligible candidates, and the transition team of the President-elect. OGE also met and engaged with additional stakeholders, including non-governmental organizations such as the Partnership for Public Service's [Presidential Transition Service Providers' Council](#).



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Today, OGE participated in the first meeting of the Agency Transition Directors Council. (pdf) [whitehouse.gov/wp-content/upl...](https://www.whitehouse.gov/wp-content/uploads/2021/01/2021-01-20-AGTC-Meeting-1.pdf)

Training and Support to the Transition Team and New Administration

Prior to and after the election, OGE provided multiple training sessions to incoming administration officials on nominee financial disclosure and the use [Integrity](#), OGE's executive branch-wide electronic public financial disclosure system.

OGE provided feedback on worked with the transition team on any government-wide ethics initiatives, including the provision of technical assistance and implementation of ethics-related executive orders. OGE also offered extensive support to the new White House in setting up their ethics program, including providing an expert detailee. OGE will continue to provide training and support, as needed to the new Administration.

Strategic Objective 3.2: Providing assistance to the President and the Senate in the presidential appointment process

Following a presidential election and throughout an administration, OGE continuously assists the President and the Senate in the presidential appointment process. In fiscal years 2021 and 2022, OGE will lead a government wide effort to collect and thoroughly review financial disclosure reports of over 1,000 individuals being considered for the highest-level positions in the executive branch:

presidentially appointed, Senate-confirmed (PAS) nominees. The reports for

these positions are the most complex financial disclosure reports in the Government. In connection with the review of these reports, OGE reviewers work with officials at various federal agencies and the White House to resolve potential conflicts of interest through written ethics agreements. These reports are typically extensive and complex containing complicated business arrangements, investment vehicles or trust which are hard to untangle and can create novel and difficult conflict of interest issues. Other difficult issues include severance arrangements, which often present potential conflicts of interest that must be resolved before entering government. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to review nominee reports and craft ethics agreements, leaving the President unable to timely appoint agency leaders.
- OGE is unable to timely transmit nominee financial disclosure reports to the Senate, delaying hearings and leaving agencies without leaders.
- Potential conflicts of interest may be undetected or inadequately remedied, resulting in loss of public trust and disruption to the government.
- OGE is unable to maintain its electronic financial disclosure filing system, resulting in more than 23,500 senior officials reverting to less efficient and less accurate paper filing of financial disclosure reports, significant delays in review and certification, and unresolved conflicts of interest left unidentified and unaddressed.

Provide expert, second-level review of financial disclosure reports of nominees to highest-level executive branch positions

In fiscal years 2021 and 2022, OGE expects to review and certify a greatly increased volume of public financial disclosure reports for financial conflicts of interest based on the



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Financial disclosure is a key part of the [#confirmation](#) process for Presidential appointees, which means it's also key in the [#transition](#).

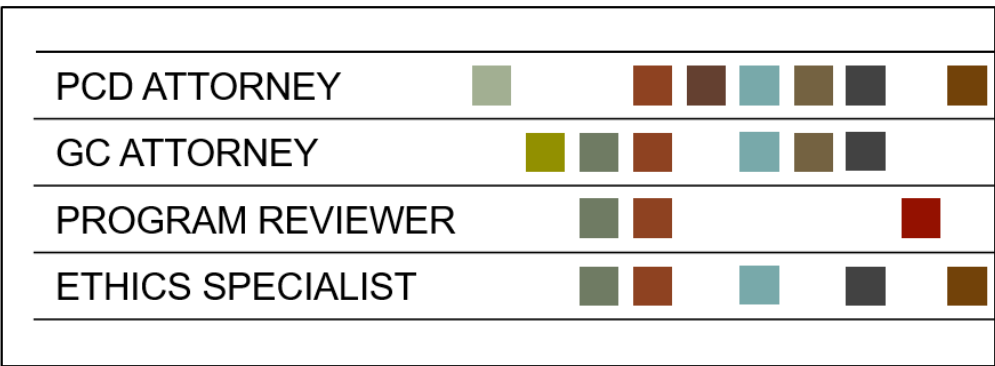
outcome of the election, historical data, and OGE's previous experience with new administrations. OGE is actively working with agency ethics officials to identify and resolve any conflicts of interest the new

Administration’s incoming PAS leaders may have. This work is especially critical during a presidential transition when, due to vacancies in most senior leadership positions, the nation is particularly vulnerable to national security and other risks.

OGE identifies and resolves potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. In fiscal years 2021 and 2022, OGE will shift its highly cross-functional staff as necessary to timely review financial disclosure filings. OGE staff analyze and resolve the potential conflicts of interest of incoming executive branch leaders and leverage the process to provide these leaders with an introduction to their new ethical responsibilities as public servants. OGE also provides departing officials with post-government employment guidance.

- Related Post-Election Work**
- ***Integrity Support (p.18)***
 - ***Legal Guidance (p.22)***
 - ***Ethics Agreement Certification (p.27)***
 - ***Certificates of Divestiture (p.27)***
 - ***Termination Reports (p.27)***
 - ***Increased External Interest (p.38)***
 - ***Post Documents (p. 38)***
 - ***Fulfill Document Requests (p. 38)***

OGЕ STAFF ARE HIGHLY CROSS-FUNCTIONAL

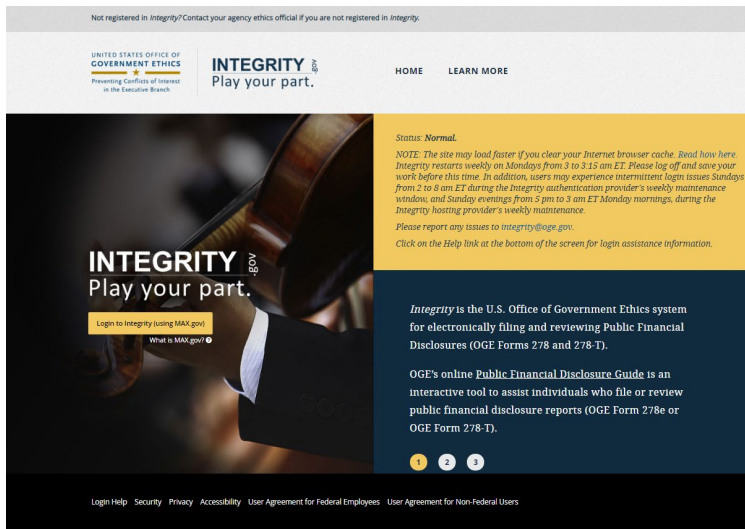


VITAL TO HIRE, TRAIN, AND RETAIN EXPERTISE

Based on prior post-election periods, it is anticipated the volume of nominee reports will continue to be high in fiscal year 2022, likely driven in part by the renomination of officials who were not confirmed by the Senate in fiscal year 2021. In fiscal year 2022, OGE will continue to review for financial conflicts of interest and to certify an increased volume of public financial disclosure reports resulting from the 2020 presidential election. OGE will also actively study the nominee review process and gather input from stakeholders to determine and act on lessons learned from the fiscal year 2021 post-election period.

Successfully operate Integrity, the system to review and analyze the financial disclosure reports submitted during the presidential transition

In fiscal years 2021 and 2022, OGE will also work to ensure that *Integrity* efficiently manages the increased number and complexity of filings of the new PAS nominees using the system during the post-election period and continues to produce high-quality financial disclosures by helping filers more accurately report required information. In addition to helping incoming presidential nominees—many of whom have extremely complex financial disclosure filings—more accurately and easily complete their disclosures, the system has enabled the executive branch to seamlessly continue the public financial disclosure process throughout the COVID-19 pandemic. During the pandemic, the value of *Integrity* has been even more apparent, when virtual access has been essential and public trust matters most. As the presidential election approached and after it occurred, OGE has provided and will continue to provide additional support for ethics officials who are responsible for nominee reports in the system. OGE will also work to ensure that [Integrity](#) continues to run reliably for current filers and the web-based system maintains secure and stable operations. OGE will continue providing high-quality support for users and agencies, who are provided the resource at no cost and have been highly satisfied. In addition, OGE will continue to convene regular *Integrity* Advisory Council meetings to provide a platform for agencies to discuss and prioritize upgrades to the system. OGE will also continue to update its online resources, working to provide shorter, more targeted instructional videos and written instructions for commonly recurring questions.



STRATEGIC GOAL IV



ENGAGE THE PUBLIC IN OVERSEEING GOVERNMENT INTEGRITY

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility, helping to make the American people aware that there are systems in place and mechanisms available to hold their government accountable. OGE works to give the public reasons to trust their government, and acknowledges when officials violate that trust. OGE finds Americans where they are, on social media, through the press, and indirectly through Congress, and gives them the information they need to verify that their executive branch officials are free from conflicts of interest, and that their officials are working on behalf of the American people and not for personal or others' financial interests.

To achieve its strategic goal of engaging the public in overseeing government integrity, OGE has developed two strategic objectives:

- (4.1) Inform the public about OGE and the executive branch ethics program, and
- (4.2) Make ethics information publicly available.

If the public does not have the information it needs to ensure that government leaders are free from conflicts of interest, their trust in government may erode, and they may become convinced that government leaders are prioritizing private interests over the nation's interests.



Strategic Objective 4.1: Inform the public about OGE and the executive branch ethics program

OGE informs the public and other key stakeholders about OGE and the executive branch ethics program to raise awareness of the systems and processes in place to detect and resolve conflicts of interest. This enables the public to hold government officials accountable. In fiscal years 2021 and 2022, OGE will continue its external communications efforts to increase understanding of the executive branch ethics program. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to help the public and the media understand ethics requirements, resulting in less accurate news coverage and unwarranted criticism of government leaders.
- OGE is unable to maintain its website, resulting in less timely and accurate ethics information, confused government officials, and less informed Americans.

Provide relevant, understandable information to enable Americans to hold their government accountable

Without accurate information Americans cannot make informed judgments about the integrity of their government. When Americans feel that information is being withheld, they may become suspicious, and their confidence in their government may erode.

To promote public confidence, OGE has a responsibility to communicate effectively about the executive branch ethics program. OGE communicates with the public directly through publications, its website, and social media. OGE also communicates with Americans through the media and government watchdog groups. In fiscal years 2021 and



2022, OGE will continue to ensure that its communications are accurate, compelling, relevant, and tailored to each targeted audience, as well as delivered through effective communication channels. When appropriate, OGE will also seek input from the public on ways the agency can improve its communications efforts.

A robust dialogue between Americans and their government is essential to the success of the nation. OGE will

do its part to make sure the American people have the information they need to hold their executive branch officials accountable for ethical conduct.

Timely respond to external requests for information and assistance

Outside interest in the executive branch ethics program has grown significantly in recent years. Inquiries from the public, the press, Congress, and associations require OGE's timely attention and response. When these stakeholders do not receive information timely, they may publish inaccurate stories, take hasty action, or simply lose confidence in the integrity of the executive branch.

To ensure that these stakeholders have the information they need, when they need it, OGE will timely respond to the expected 1,000 external requests for information and assistance received each year from the public, the press, Congress, and various associations. OGE will focus on ensuring that its staff is well-trained and equipped to absorb the increase in requests that is expected after the presidential election. Through these interactions, OGE aims to increase awareness and understanding of the executive branch ethics laws and regulations, and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and publishing helpful information on its website.

Collaborate with and engage a broader array of stakeholders

Ethics in government is a shared concern across all segments of society. To succeed, OGE must learn from experts in diverse fields. Therefore, OGE continues to participate as a member of private sector, state, and local ethics organizations such as the Council on Governmental Ethics Laws ([COGEL](#)), in addition to federal interagency groups, such as the [Small Agency Council](#). Through meetings, presentations, and online forums, OGE continues to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. OGE also conducts outreach and participates with organizations that share common interests related to OGE's mission, such as the [Partnership for Public Service](#). 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.



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This week OGE met with ethics officials from all three branches of the Federal Government to discuss shared goals.

Strategic Objective 4.2: Make ethics information publicly available

OGE makes ethics information publicly available to help the American public hold senior leaders accountable for making decisions that are based on the interests of the public rather than their own personal financial interests. In fiscal years 2021 and 2022, OGE will continue to make ethics documents publicly available. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to timely publish ethics documents, leaving the public unable to verify that leaders are free from conflicts of interest and to hold OGE accountable.

Make Ethics Documents Publicly Available

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2021 and 2022 OGE will continue to timely post a variety of critical ethics documents on its website. OGE launched its redesigned website in fiscal year 2020 with increased search functionality to improve public access to ethics documents and ethics officials' access to key resources needed to perform their jobs. Available documents include agency program review reports, policy guidance,

information about each agency's ethics program, documentation of senior leaders' compliance with ethics



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On our Open Government portal, you can find out how to access financial disclosure reports and ethics agreements for the most senior officials in the executive branch.

commitments, and financial disclosure reports of high-level officials. OGE also will continue to remind agencies of their obligation to make ethics documents available promptly.

In addition, OGE created and periodically updates a dashboard display to provide information regarding the recommendations issued as the result of ethics program reviews, or any other oversight activity. OGE also created and will periodically update a dashboard display to provide information regarding referrals to the Department of Justice involving the potential violation of the criminal conflict of interest statutes.



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On our FOIA page you can find out how to make a request, read documents that have been frequently requested, and see all the documents that have been released since January 1, 2017.
[oge.gov/Web/OGE.nsf/Fr ...](https://oge.gov/Web/OGE.nsf/Fr...)

Finally, OGE will maintain its strong FOIA program. In recent years, OGE’s volume of FOIA requests has remained higher than its historical average, driven in part by the public’s ongoing interest in government ethics issues. To increase transparency and respond to burgeoning public interest, OGE will continue its practice of proactively posting on its website

documents released in response to FOIA requests that are of particular interest to the public. In both fiscal year 2021 and 2022, OGE will focus on ensuring that the FOIA staff is well-trained and equipped to absorb any significant increases in the number of FOIA requests that are received by OGE following the presidential election. For example, following the 2016 election, OGE saw a more than 400% increase in FOIA requests.

MANAGEMENT OBJECTIVES



OGE must be a strong, well-run agency in order to carry out its critical mission of preventing conflicts of interests in the executive branch. As the leader of the executive branch ethics program, OGE believes it is important that OGE serve as a model agency. Therefore, OGE strives to be a responsible steward of taxpayer dollars and remain compliant with the wide array of requirements applicable to federal agencies. Just as important is supporting the development of OGE's most valuable asset--its staff, who tirelessly carry out the day-to-day work necessary to accomplish the agency's vital mission.

In support of its mission and strategic goals, OGE has developed three management objectives:

- (5.1) Sustain a strong culture of performance management,
- (5.2) Strengthen fiscal stewardship and organizational compliance, and
- (5.3) Continuously enhance OGE's information systems and processes.



Management Objective 5.1: Sustain a strong culture of performance management

In fiscal years 2021 and 2022, OGE will work to sustain its strong culture of performance management through extensive accountability, development, and performance mechanisms. Continued attention to these areas is of critical importance to the agency's operations and successful performance of its mission activities.

Accountability and Performance: OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In fiscal year 2021, OGE will begin drafting the 2022 – 2026 Strategic Plan.

Employee Recognition: OGE will continue to recognize employees through its award program, which includes spot awards and year-end performance bonuses. In fiscal year 2020, OGE updated its spot award program to ensure more awards are granted throughout the year and that they are based on a set of criteria. OGE also will continue to hold its annual employee recognition event. In fiscal year 2020, based on feedback gathered from the Federal Employee Viewpoint Survey, OGE formed an employee-led group to identify new ways for OGE to recognize differences in performance in a meaningful way. In fiscal year 2021, OGE plans to evaluate and implement their ideas.

Workforce Development: OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities, and providing employees with dedicated time and resources to pursue development. OGE will continue to incorporate the requirements of the Employee Development Plan (EDP) into employees' performance standards. In this way, OGE confirms its commitment to continuous learning and employee professional development. OGE also will continue to identify agency knowledge and skills gaps, and will use the EDP to train employees to fill those gaps. In addition, OGE will continue to provide internal and external training and development opportunities to its employees at all levels, as

OGE EMPLOYEE DEVELOPMENT PLAN			
Employee's Last Name	First Name, MI		
Division and Branch	Title		
Period Covered	Phone		
Employee's Commitment	I agree to carry out the planned activities and participate in the measurement of progress toward the objective(s), which will inform the continuous learning requirements of my performance standards.	Signature	Date
Other Employee Information or Comments			
Supervisor's Name	Phone		
Supervisor's Commitment	I have agreed to these learning objectives and will support and assist the employee in attaining them.	Signature	Date
A. Learning Objective(s)			
B. Reference to Agency Objectives	Strategic Objective 1.1- Provide expert guidance and support to stakeholders		
Identify the strategic objective(s) advanced by the planned activities.	Strategic Objective 1.2 - Strengthen the expertise of officials who are integral to the executive branch ethics program		
	Strategic Objective 1.3 -Continuously refine ethics policy and issue interpretive guidance		
	Strategic Objective 2.1- Monitor agency compliance with executive branch ethics program requirements		
	Strategic Objective 2.2- Monitor senior leaders' compliance with individual ethics commitments		
	Strategic Objective 3.1 - Prepare for a Presidential transition		
Identify the division or branch objective(s) advanced by the planned activities.	Strategic Objective 3.2- Provide assistance to the President and Senate in the Presidential appointment process		
	Strategic Objective 4.1- Inform the public about OGE and the executive branch ethics program		
	Strategic Objective 4.2 - Make ethics information publicly available		
Management Objective 5.1 -Sustain a strong culture of performance management	Management Objective 5.2 - Strengthen organizational compliance and fiscal stewardship		
	Management Objective 5.3 - Continuously enhance OGE's information systems and processes		
	Division or Branch Objective(s) Targeted		

resources permit.

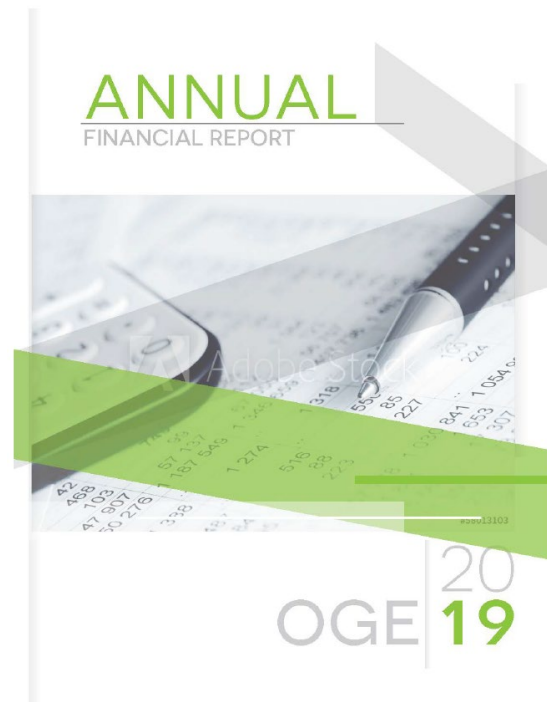
OGE also will continue to hold regular training sessions for new employees as well as other meetings for employees within the agency, to share information and to develop

and improve their knowledge and skills. These actions, collectively, will ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

Management Objective 5.2: Strengthen fiscal stewardship and organizational compliance

OGE will continue to strengthen its fiscal stewardship and organizational compliance by continuously evaluating its practices and systems to identify areas in need of improvement and to mitigate risk.

Fiscal stewardship: OGE will remain a good steward of taxpayer dollars, as reflected by its existing track record of strong financial management. OGE already has completed numerous cost-cutting initiatives, and continues to assess cost-cutting opportunities as a regular business practice. For example, OGE has reduced its office space costs by shrinking its footprint by over one-third and by digitizing its records. OGE has also used in-house information technology specialists to design, develop, and create internal applications, significantly increasing staff efficiency and reducing contracting costs. In fiscal years 2021 and 2022, OGE will continue to pursue efficiencies, such as the economies of scale received from using shared service centers for a significant number of support services.



Facilities Management: GSA's current lease for OGE's space ends February 2024. Therefore, OGE is working with GSA to review its current space needs and will begin the process of renegotiating a new lease.

Internal controls: OGE will continue to maintain effective internal controls over financial reporting, including the design, implementation, and maintenance of internal controls relevant to the preparation and fair presentation of financial statements that are free from material misstatements. OGE will continue to monitor and evaluate implemented internal controls, constantly seeking improved methods and accountability to guard against potential fraudulent practices.

Tracking purchases and inventory: Using a dedicated application on its internal network, OGE will continue to maintain its effective process for approving requisitions, which builds

in additional internal controls and tracking to ensure that OGE remains fiscally responsible. OGE also will continue to carefully track its inventory of IT equipment and furniture.

Independent audit: OGE will continue to undergo independent audits of its financial statements to ensure that they are presented fairly in all material respects, and in accordance with generally accepted accounting principles. OGE will continue to ensure that there are no material weaknesses in internal controls over financial reporting and that OGE continues to comply with applicable laws, regulations, contracts, and grant agreements.

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

Records: OGE will maintain a robust records program in fiscal years 2021 and 2022 and plans to complete NARA review and approval of several updated OGE disposition schedules. In addition to focusing on employee training, OGE also will continue to update its processes and create standard operating procedures that facilitate good records management practices.

Privacy: In fiscal years 2021 and 2022, OGE will continue to ensure the agency's compliance with the Privacy Act, as well as privacy requirements established by OMB. OGE will review proposed IT systems and projects that collect and manage privacy protected information (for example, any related to planned legal expense fund regulations), and will continue recertifying existing IT systems and projects, reviewing Privacy Threshold Analyses, and preparing and updating privacy-related documents, such as Systems of Records Notices and Privacy Impact Assessments. OGE also will continue to review and update privacy controls that are required as part of the annual security reviews for OGE's network and *Integrity*. Finally, OGE will continue to provide annual privacy training to OGE staff and contractors.

Management Objective 5.3: Continuously enhance OGE's information systems and processes

OGE will continue to prioritize enhancing and securing its information systems, network, and website, as well as numerous mission-critical applications. Without strong information systems and processes, the agency cannot operate effectively in this digital age or efficiently perform its mission-critical activities.

Implement a comprehensive IT refresh

In fiscal year 2022, OGE will reach the end of the four-year life-cycle for many of its IT infrastructure systems and associated equipment. OGE's last IT refresh occurred in fiscal year 2018. Funding the comprehensive replacement of OGE's IT infrastructure in fiscal year 2022 will require a one-year increase in funding. OGE's IT infrastructure is necessary to all of OGE's daily, mission-critical work and must be upgraded timely, to mitigate the risk of

potential failure and to address evolving technology. As potential security threats against automated systems grow and become more complex, OGE must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated. All of these services, equipment, and supplies are necessary for the security and efficiency of OGE's ongoing daily operations – in particular, to ensure a safe and secure technical environment that protects the privacy and integrity of the financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch. For example, routers, switches, and firewalls; thin clients, laptops, monitors, servers, and infrastructure; tape backup hardware; data center backup power system; and, keyboards, mice, and printers will be replaced to meet the technological demands of OGE's virtual desktop infrastructure and end-of-life resources.

Strengthen OGE's security program

In fiscal years 2021 and 2022, OGE's security program will continue to provide mandatory annual cybersecurity awareness training; review weekly network perimeter scans performed by the Department of Homeland Security; conduct and review monthly scans of the internal OGE network; procure and participate in annual security assessment reviews conducted by accredited independent auditors, using FISMA CIO and FISMA IG metrics; deploy, configure, and maintain PIV card-compatible network copiers and scanners; prepare for *Integrity's* annual security assessment; and conduct cybersecurity and privacy training. OGE plans to continue or to exceed its fiscal year 2020 success in meeting or exceeded FISMA targets that show OGE is "managing risk."

Enhance internal applications and streamline data collection



OGE is updating its website. If you use our site and would like to help us improve it, you can complete a brief survey here: surveymonkey.com/r/LD9JXDJ

OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal years 2021 and 2022, OGE will continue to devote resources to applications that support major

mission programs, such as the Desk Officer Program, the Annual Questionnaire, the records program, and financial disclosure tracking, as well as those applications that support internal operations such as requisition processing, budget formulation, and equipment tracking. OGE will also develop and launch a redesigned agency intranet, in conformance with the IDEA Act, for sharing information, collaboration tools, workflow tools, operational systems, and other computing services to enhance productivity among OGE staff.

Refine OGE's redesigned website

OGE will continue to maintain its newly redesigned website, which is OGE's main communication tool and the most valuable resource for OGE's stakeholders, including agency officials, the media, and the general public. OGE launched its redesigned website in fiscal year 2020, in conformance with the IDEA Act, to improve public access to ethics documents, ethics officials' access to key resources needed to perform their jobs, and to strengthen IT security. OGE will continue to refine its redesigned website, based on helpful feedback received from stakeholders after the successful launch.

Section IV – Conclusion

The important work OGE does is critical to the public’s confidence in executive branch officials and operations. OGE simply cannot carry out its crucial work without the necessary resources.

OGE requires its full requested funding of \$20,371,000 in fiscal year 2022 to undertake its important mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch. An underresourced OGE creates significant risk, undermines the integrity of government operations, and further strains public confidence. Funding at the requested level will allow OGE to operate with sufficient staff resources, undertake its necessary IT infrastructure improvements to ensure it remains secure and reliable, and continue to improve and enhance *Integrity*. These investments are critical to OGE’s ability to continue to successfully undertake its vital work.

For all of the vital reasons outlined here and in its justification, OGE urges the approval of its request for \$20,371,000, to fund the agency in fiscal year 2022.

Cutting or underfunding OGE’s budget would increase risk to the executive branch ethics program operations.

**“THE ISSUE OF ETHICS
IN GOVERNMENT IS
VIEWED AS A SERIOUS
PROBLEM BY ABOUT
AS MANY PEOPLE
(67%) AS DRUG
ADDICTION – THE TOP
ISSUE, AT 70%.”**

Pew Research Center
*Report on Trust and
Distrust in America,
July 2019*

Appendix A – Fiscal Years 2021 and 2022 Performance Goals

Strategic Goal I: Advance a Strong, <u>Uniform</u> Executive Branch Ethics Program			
Strategic Objectives	Performance Goals	Fiscal Year 2021 Target	Fiscal Year 2022 Target
1.1: Provide expert guidance and support to stakeholders	OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps officials perform their ethics job duties.	85%	85%
	Agency administrators are satisfied with the support provided by OGE on <i>Integrity</i> , its electronic public financial disclosure filing system.	70%	70%
1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program	After participating in an OGE training event, officials believe they can more effectively perform their ethics job functions.	85%	85%
	After using a learning tool provided by OGE, officials believe they can more effectively perform their ethics job functions.	85%	85%
1.3: Continuously refine ethics policy and issue interpretive guidance	Legal and Program Advisories help officials perform their ethics job duties.	80%	80%

Strategic Goal II: Hold Executive Branch Agencies <u>Accountable</u> for Carrying Out an Effective Ethics Program			
Strategic Objectives	Performance Goals	Fiscal Year 2021 Target	Fiscal Year 2022 Target
2.1: Monitor agency compliance with executive branch ethics program requirements	In cases in which OGE identifies a program weakness, OGE's program review results in improvements in the agency's ethics program.	75%	75%
	Agency ethics programs are reviewed within established time frames.	4-year cycle - 28% of agencies (17) 5-year cycle - 26% of agencies (14)	4-year cycle - 29% of agencies (25) 5-year cycle - 19% of agencies (10)
2.2: Monitor senior leaders' compliance with individual ethics commitments	Public financial disclosure reports (new entrant, annual, termination, and transaction) required to be submitted to OGE for second-level review are closed within established time frames.	90%	90%

Strategic Goal III: Contribute to the <u>Continuity</u> of Senior Leadership in the Executive Branch			
Strategic Objectives	Performance Goals	Fiscal Year 2021 Target	Fiscal Year 2022 Target
3.1: Prepare for a presidential transition	Actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth presidential transitions.	Milestone: Provide expertise and/or resources.	After having completed a post-election period, study lessons learned.
	Key transition-related resources are updated within established time frames.	Provide guidance on any executive branch-wide ethics initiative by the Administration, including any Executive Orders.	-
3.2: Provide assistance to the President and the Senate in the presidential appointment process	Initial comments on draft financial disclosure reports of presidential nominees for Senate-confirmed appointments are provided to the agency within established time frames.	85%	85%
	Final financial disclosure reports of presidential nominees for Senate-confirmed appointments are certified by OGE within established time frames.	90%	90%

Strategic Goal IV: Engage the Public in Overseeing Government Integrity			
Strategic Objectives	Performance Goals	Fiscal Year 2021 Target	Fiscal Year 2022 Target
4.1: Inform the public about OGE and the executive branch ethics program	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: - Number of ethics documents viewed - # of public inquiries - # of outreach activities - Twitter engagement rate	Indicators: - Number of ethics documents viewed - # of public inquiries - # of outreach activities - Twitter engagement rate
4.2: Make ethics information publicly available	Ethics documents are posted within established time frames.	85%	85%

Management Objectives			
Management Objectives	Performance Goals	Fiscal Year 2021 Target	Fiscal Year 2022 Target
	Create or revise standard operating procedures for key agency programs.	4 per year	4 per year
5.2: Strengthen organizational compliance and fiscal stewardship	Percentage of OGE employees that take required training (i.e., records, security, privacy, ethics).	90%	90%
	Results of annual financial audit.	Unqualified opinion	Unqualified opinion
5.3: Continuously enhance OGE's information systems and processes	Percent of non-maintenance downtime of <i>Integrity</i> , OGE's network and website.	<i>Integrity</i> = Establish baseline Network and website = <1.0%	<i>Integrity</i> = 1.0% Network and website = <1.0%
	Results of Cybersecurity Risk Management Assessment.	Managing risk for majority of categories	Managing risk for majority of categories