September 10, 1998

MEMORANDUM

TO: Jack Covaleski
              Senior Associate Director, OAP

THRU: Ed Pratt
              Chief, PRD

FROM: Phyllis A. Hoffer
              Assistant to the Chief, PRD

SUBJECT: Results of OGE's Field Office Ethics Program Survey

        The Office of Government Ethics (OGE) evaluates whether OGE and executive branch agency ethics policies are effectively meeting intended objectives. One goal of these evaluations is to detect problem areas for departments and agencies (agencies) in implementing ethics regulations or in operating their ethics program and to provide information which can serve as a basis for designing assistance to agencies in these areas. This goal is set out in OGE's strategic plan and echoed in its annual performance plan.

        In 1997, the Program Review Division (PRD) conducted a survey of executive branch agency ethics officials' experiences regarding their agency ethics training program. See DAEOgram of June 2, 1997 (DO-97-026). One result of that survey, was a recommendation that OGE review and evaluate agency regional ethics program issues to identify problems and determine how to best assist in resolving them. To respond to that recommendation and as part of OGE's continuing evaluation process, from May to July 1998, PRD surveyed field office ethics officials to learn more about their experiences, opinions, and needs regarding various facets of their office's ethics program and to obtain information which will help OGE provide assistance that would benefit those programs.

        The survey consisted of a questionnaire to the primary ethics official at 523 field office locations of 20 civilian agencies of the executive branch. The questionnaire sought to obtain information and opinions on: (1) satisfaction with ethics program organizational location, staffing, and support from field office and executive branch agency management; (2) adequacy of ethics training for ethics officials; (3) satisfaction with ethics materials and information and use of OGE's Web site as a source of information; (4) implementation of

the 1997 interim rule training amendments; (5) program successes and problems; and (6) effects of budget reductions. The questionnaire also provided field ethics officials an opportunity to comment on various issues. It also served as OGE's annual training needs assessment.

This report presents our analysis of the information provided by the 470 ethics officials who responded to our questionnaire. All percentages presented in the report are based on the number of ethics officials who answered each question, which in some cases was fewer than the total number of ethics officials that responded to the questionnaire. (Details on the scope and methodology of this survey are included as appendix I.)

RESULTS IN BRIEF

Field office ethics officials must fulfill many regulatory and administrative requirements to effectively administer their office's ethics program. In addition to these requirements, field offices are often remotely located from their agency headquarters. As a result, they often do not have the same level of access to training and support as ethics programs located in agency headquarters offices. Although the field ethics officials that responded believe they are successfully meeting the many requirements of the ethics program and that their needs are generally being met, they identified areas where additional program support and assistance would be beneficial. Specifically, field office officials

-are satisfied with the organizational location and staffing of their ethics programs and believe that their programs are being supported by their local and agency headquarters management. However, they identified areas where additional support would improve their programs.

-believe ethics training for ethics officials is adequate. However, almost all indicated that they would be interested in attending additional training for ethics officials and identified specific kinds of training they would like to attend and training topics which they believe would be beneficial.

-are satisfied with the ethics-related materials and information available to them to support their decision-making and provide ethics advice to field office personnel. However, in some specific areas, officials are not satisfied with the available materials. Further, almost two-thirds indicated they had never used OGE's Web site as a source of materials and information and many officials reported they were unaware of its existence.

-ethics officials generally consider their ethics program successful despite some continuing significant problems and despite the effects of budget reductions -- 17 percent of the officials indicated there were negative effects on their field office ethics program from budget reductions. In two training-related areas in which problems continue--employee attendance at ethics

training and materials/methods for conducting training--less than half indicated their agency had implemented the 1997 interim rule training amendments.[1] Moreover, over half of all of the officials indicated that the interim rule change would not be implemented until after 1998, if at all.

PRINCIPAL FINDINGS

Ethics officials reported satisfaction
with program location, staffing,
and support from management

Ethics officials were asked their opinions on whether administration of the ethics program was organizationally located within the structure of their field office in the best place to carry out the program's responsibilities, the program was administered by the most appropriate job discipline, and the program staffing level was adequate to effectively administer the ethics program. They were also asked how satisfied they were with the level of support received for the ethics program from management at their field office and from their agency headquarters and what additional support was needed.

Most ethics officials reported that their program was organizationally located in a legal office and staffed by attorneys.[2] As shown in Figure 1, not surprisingly, those programs located in legal offices were primarily administered by attorneys and those located in personnel offices were primarily administered by personnel specialists. Programs located in regional/field director's offices were administered by a mixture of job disciplines including attorneys, personnel specialists, and other jobs identified by respondents, such as assistant directors and administrative officers.

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[1]The interim rule amendments to OGE's training regulation (subpart G of 5 C.F.R. part 2638) generally provide, among other things, that an agency may satisfy the annual ethics training requirement for covered employees, other than public filers, through the distribution of a written ethics briefing to those employees for up to two out of every three calendar years. The purpose of this change was to provide agencies relief from the annual verbal training requirement for most employees.

[2]Two-thirds of the ethics officials reported that their program was organizationally located in a legal office, 15 percent in the regional/field director's offices, and 13 percent in personnel offices. A relatively small number of officials reported that their program was located in a designated ethics office or in "other" primarily administrative offices. Correspondingly, about 75 percent of the officials indicated that attorneys were the job discipline primarily responsible for ethics program administration, about 15 percent indicated personnel specialists were responsible, and about 10 percent indicated other job disciplines .

Figure 1: Organizational Locations and Job Disciplines
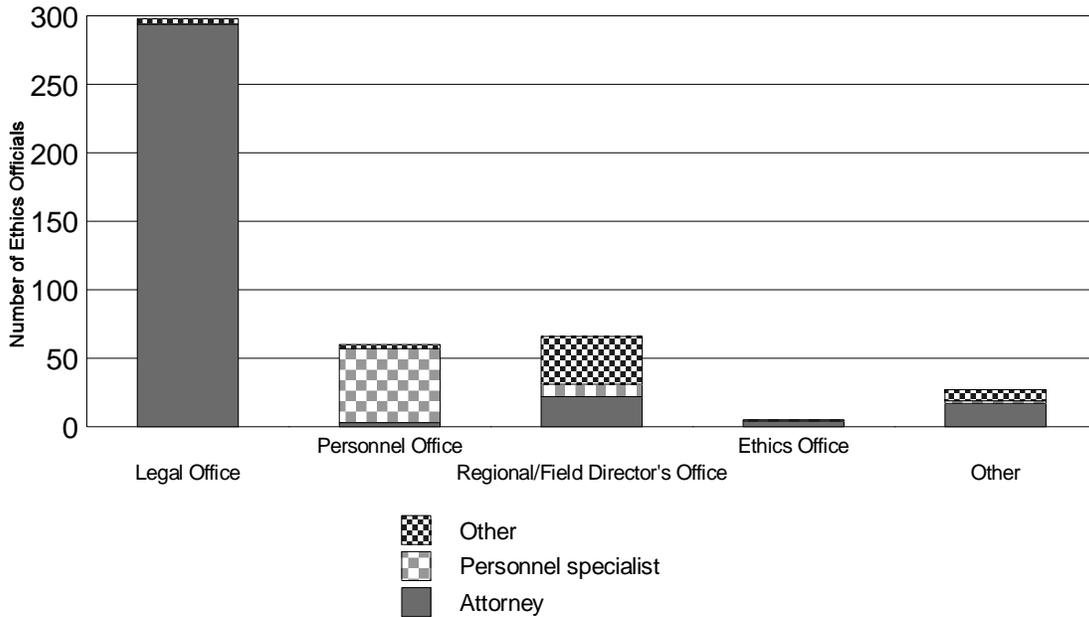
Note: 453 officials answered the 2 questions illustrated.

Overall, about 92 percent of the officials reported that their ethics program was organizationally located in the best place to carry out its responsibilities. As shown in Figure 2, this was especially true when the program was administered by legal offices (95 percent appropriately located) or regional/field director's offices (91 percent). In contrast, about 6 percent of the officials indicated that their ethics program was not appropriately located and 2 percent were uncertain. Interestingly, ethics programs administered in personnel and "other" offices were identified most often as those that would be better located in another organization (12 percent and 15 percent, respectively).

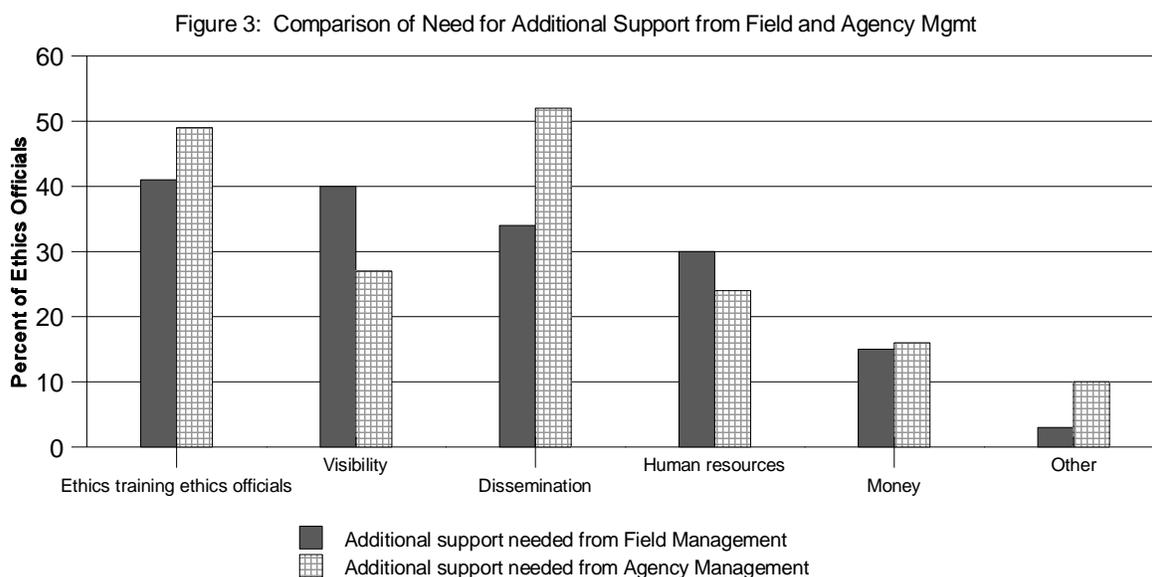Figure 2: Satisfaction with Appropriate Program Organizational Location
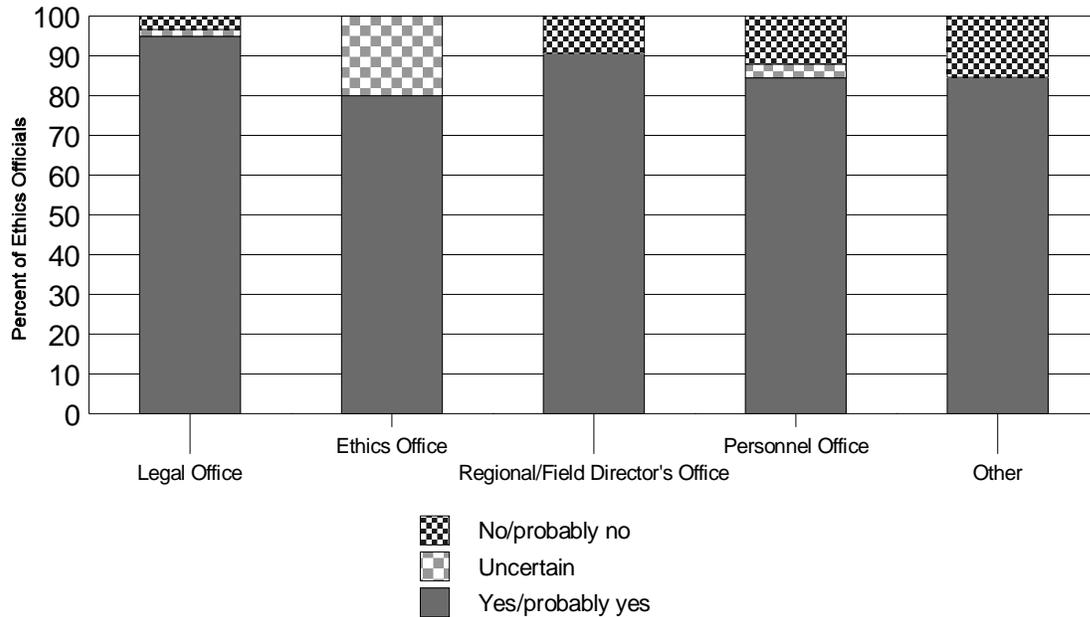
Almost all of the officials that indicated attorneys administered their program believed that was the most appropriate job discipline for the ethics responsibility (96 percent), whereas a significantly lower percentage whose programs were administered by personnel specialists or "other" disciplines believed that the relevant discipline was the most appropriate (82 percent and 78 percent, respectively). Those who indicated the program would be better administered by attorneys most often gave as their reason that program issues are complex and require a high level of knowledge of ethics laws and regulations.

Most officials also indicated that their program's staffing level was adequate to effectively administer their office's program - with 87 percent reporting that there were an adequate number of staff who spent a sufficient amount of time on the ethics program to effectively administer it. However, 11 percent reported that the staffing level was less than adequate. Two percent were uncertain. Again, we found that those who were less satisfied (in this case with the staffing level) were from programs administered by personnel specialists. Also, as discussed in more detail later in this report, those less satisfied were likely to have experienced negative effects of budget reductions.

A positive factor contributing to the effective management of field office ethics programs was the level of program support received from both field office and agency headquarters management. About 80 percent of the ethics officials indicated that they were satisfied with the program support received from management at both organizational layers. Only six percent of the officials indicated they were dissatisfied with the level of support received from field office or agency headquarters management. Again, those who

reported they were dissatisfied were primarily from programs administered by personnel specialists.

Because of the high level of reported satisfaction, it was not surprising that about half of the officials indicated that no additional assistance was needed from either field or agency management. However, as shown in Figure 3, the other half, including some who reported themselves very satisfied, indicated that additional assistance from both field and agency headquarters management in areas such as ethics training for ethics officials, dissemination of ethics information and materials, visibility of the ethics program, and

Figure 3: Comparison of Need for Additional Support from Field and Agency Mgmt

Additional support needed from Field Management
Additional support needed from Agency Management

Note: Respondents could give more than one response.

human resources would benefit the program

The need for improved dissemination of information and ethics training for ethics officials in the field also recently came to our attention from a source outside of this survey. Last year, we found that registration at several OGE regional training sessions was less than anticipated and in at least one case, a training session was canceled because of the lack of response by ethics officials to the session notification/registration memorandums. OGE routinely disseminates the notification/registration information on regional training (when, where, and on what topics) to agency Designated Agency Ethics Officials (DAEOs) via DAEOgram.
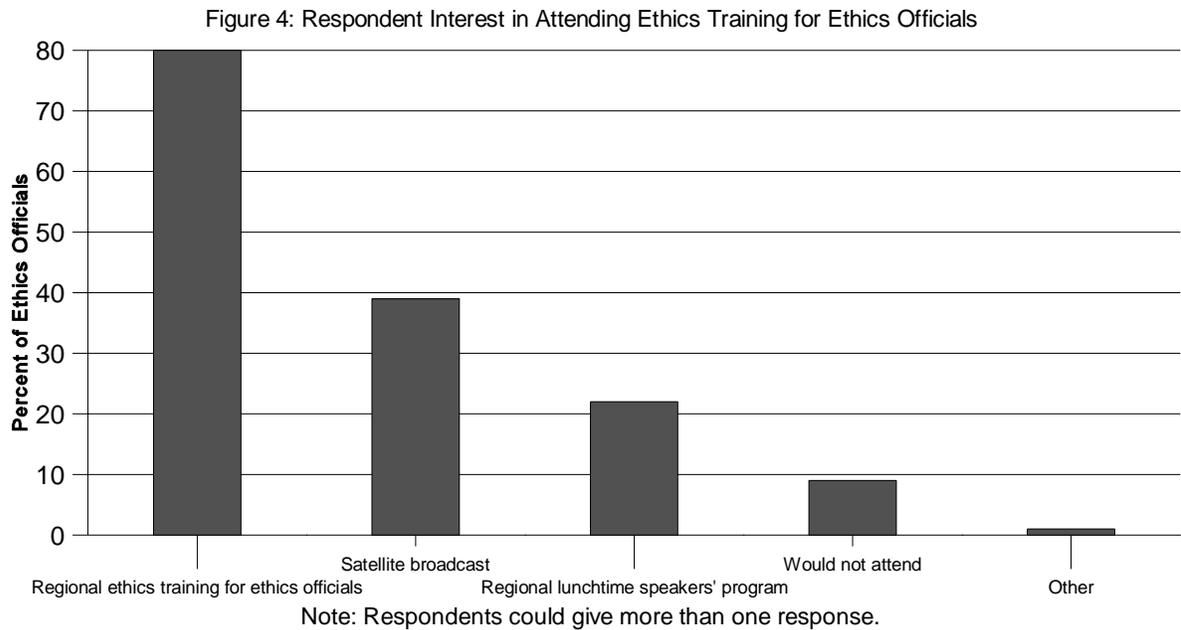
In an effort to resolve this low response problem, for selected regional training sessions we sent the notification/registration DAEOgrams directly to field offices using the updated name and address listing of field office ethics programs developed for this survey. As a result, we found that not only did attendance increase, but we also received positive responses from field office officials thanking us for providing the information directly to them. Some told us that they had not received previous notifications of regional training sessions from their agencies.

<u>Most reported adequate training for</u>
<u>ethics officials but more is needed</u>

Ethics officials were asked their opinions on the adequacy of ethics training for ethics officials, the kinds of training sessions they would like to attend, and the topics on which they need training. These topics were included in the survey to help OGE better focus its training development resources and in response to a recommendation in OGE's 1997 survey of agency ethics training programs.

Most ethics officials, about 82 percent of those responding, reported that their field office ethics staff had received adequate ethics-related training to effectively administer the program; however, 13 percent told us that the amount of training was not adequate. Four percent were uncertain. Again, we found that those officials reporting less satisfaction were more often from programs administered by personnel specialists and from programs that had experienced budget reductions.

Regardless of whether they believed that the amount of ethics training received was adequate, most officials indicated that they would be interested in attending additional ethics training. As shown in Figure 4, 80 percent of the ethics officials reported that they would be interested in attending additional regional ethics training classes. (See appendix II for a listing of respondent-identified training locations.) Also, a substantial number indicated that they would be interested in attending training provided via satellite

Figure 4: Respondent Interest in Attending Ethics Training for Ethics Officials

Note: Respondents could give more than one response.

broadcast and/or a regional lunchtime speakers' program.

Officials' answers also identified a wide range of topics on which they believed additional training is needed. As shown in Figure 5, 18 U.S.C. § 208 (conflicting financial interests), outside employment, 18 U.S.C. § 207 (post employment), and misuse of position

were each identified by over 40 percent of those officials who indicated a need for additional training. These topics were also among those most frequently identified as requiring moderate to extensive research in order to provide ethics advice or make decisions.

Figure 5: Respondent Training Needs

Note: Respondents could give more than one response.
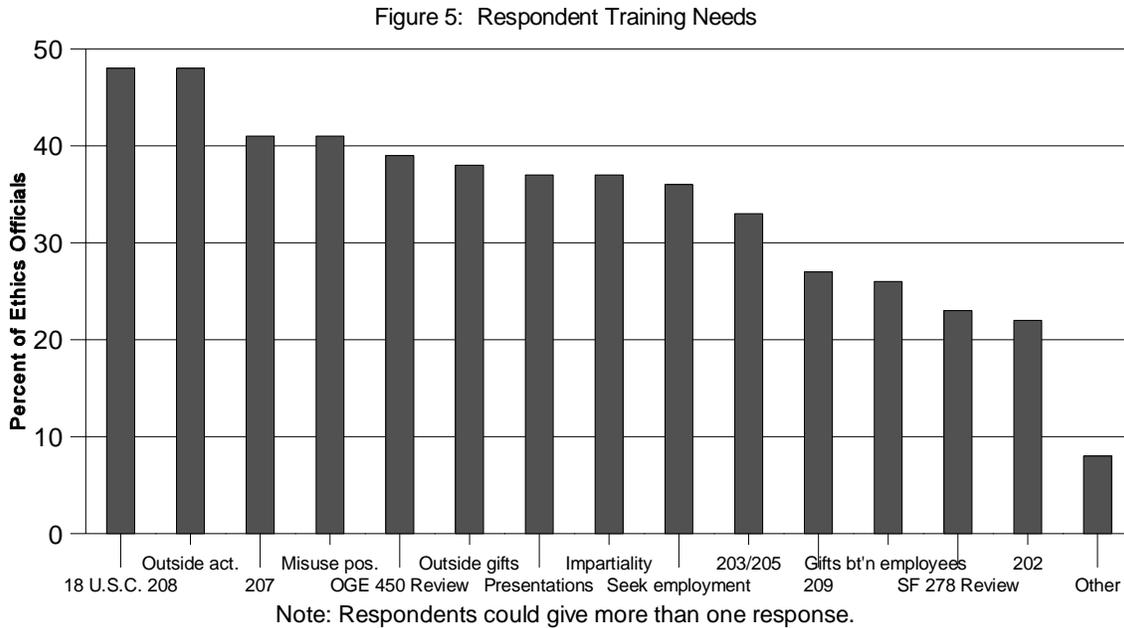
Most officials were satisfied with available
ethics materials and information

Ethics officials were asked a series of questions concerning the ethics-related materials and information they use as a basis for providing ethics-related advice. They were also asked to identify their sources for ethics-related materials and information.

Officials indicated that they were generally satisfied that they had sufficient ethics-related materials and information on each of the 13 topics studied[3] to provide ethics advice or make decisions. As shown in Figure 6, in each area, over 75 percent reported that they were generally satisfied.

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[3]The list includes: 18 U.S.C. § 202; 18 U.S.C. § 203/205; 18 U.S.C. § 207; 18 U.S.C. § 208; 18 U.S.C. § 209; gifts from outside sources; gifts between employees; impartiality in performance of duties; seeking other employment; misuse of position, resources, information; outside employment/activities; review of public reports; and review of confidential reports.

Figure 6: Comparison of Satisfaction - Sufficiency of Ethics-related Materials

Legend:
- Dissatisfied/very dissatisfied
- Undecided
- Very sat./satisfied
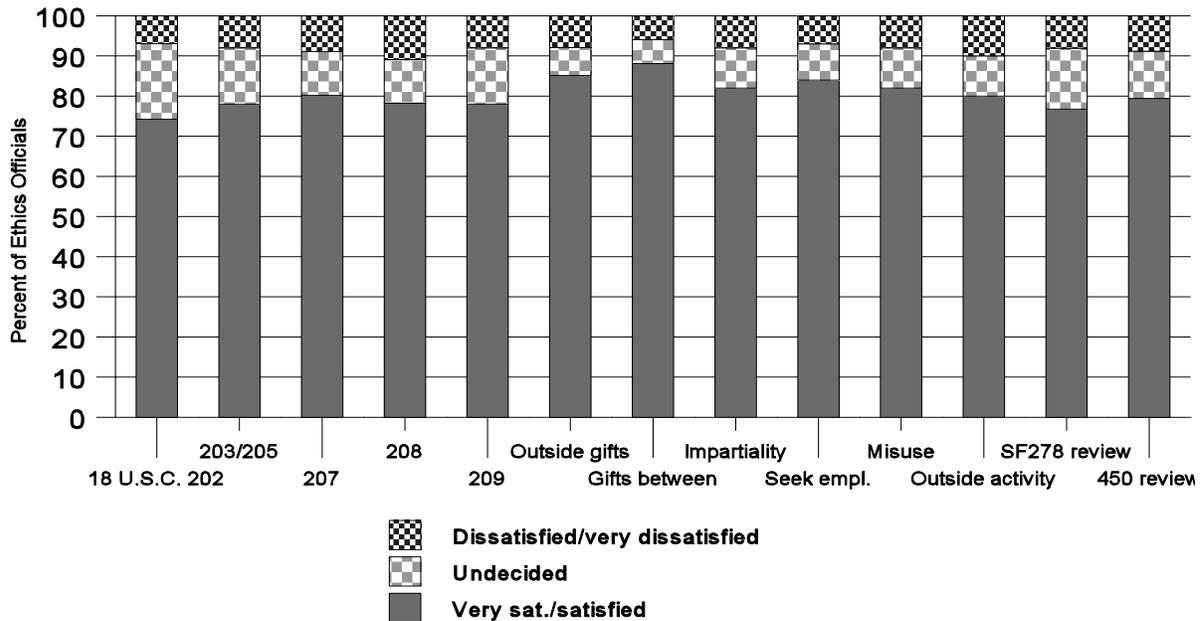
Most told us that they had basic ethics-related materials readily available including ethics laws and regulations,[4] the OGE 450 Review Guide, and OGE training videos. However, fewer than one-third reported that they had OGE guidance materials such as DAEOgrams and OGE's Informal Advisory Letters/Formal Opinions readily available.

While satisfaction rates were generally high, it should be noted that from 6 percent to 11 percent were not satisfied with the sufficiency of available materials and information. Also as shown in Figure 6, the topics generating the highest dissatisfaction levels were 18 U.S.C. § 208 (conflicting financial interests) and outside employment/activities. Again, those who reported that they were not satisfied with the materials and information on these topics were generally from programs administered by personnel specialists.

Officials were also asked to identify their sources for ethics-related materials and information. As expected, most ethics officials reported that their own agency was their primary source and more than half reported using OGE as a primary or secondary source of ethics-related information. However, we were disappointed to find that, as shown in Figure 7, 66 percent of the officials reported not having used OGE's Web site, either because they chose not to (31 percent), were not aware of the Web site (25 percent), or did not have Internet access (10 percent). Use of OGE's Web site can provide assistance to officials in furthering their understanding and interpretation of ethics laws and regulations by providing access to all DAEOgrams and OGE's Informal Advisory

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[4]For example, the Conflict of Interest Statutes, The Ethics in Government Act, the Standards of Ethical Conduct for Employees of the Executive Branch, 18 U.S.C. § 208 Exemptions, etc.

Letters/Formal Opinions, which are essential ethics program documents. In addition, expanding the use of OGE's Web site would enable field offices to obtain information on planned regional training sessions directly from OGE (the information is on the Web site now), which would help to resolve this previously identified problem.

Figure 7: Respondents' use of OGE Web site on the Internet
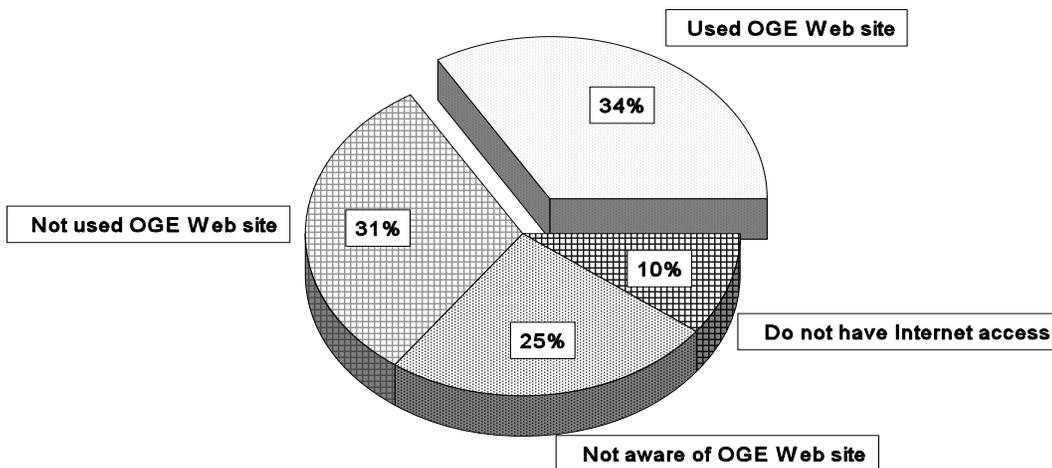
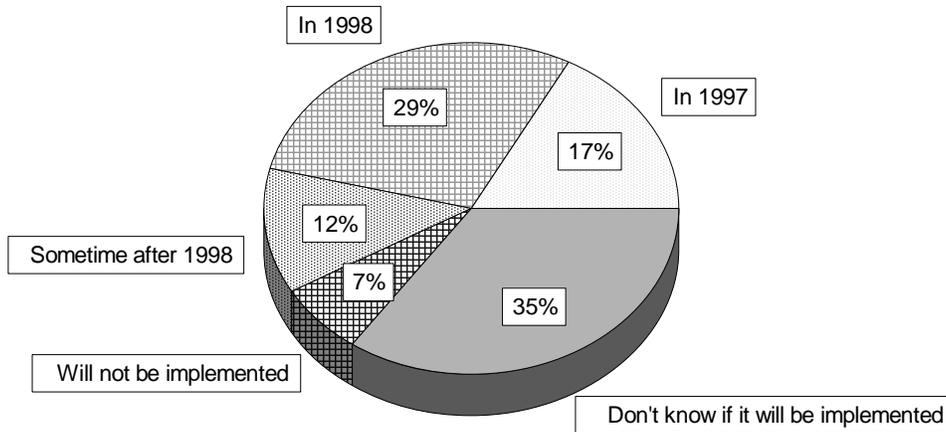Note: 451 officials answered this question.

Many offices have not implemented the
1997 interim rule training amendments

Ethics officials were asked to report whether or not their field office had implemented or would implement the 1997 interim rule amendments to OGE's ethics training regulation. The purpose of this change was to provide agencies relief from the annual verbal training requirement for most employees.

Fewer than half of the ethics officials indicated that they had taken advantage of the relief offered by the interim amendments. As shown in Figure 8, approximately 46 percent reported that the change allowing agencies to provide written briefings to covered employees, other than public filers, for up to two out of every three calendar years had been or would be implemented in 1997 or 1998. The remaining 54 percent reported that the change would not be made until after 1998, if at all.[5] Again, we found that programs administered by personnel specialists were less likely to have implemented the training changes.

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[5]OGE is currently conducting a survey on the implementation of the interim rule amendments. The survey is being administered at all agencies that undergo an ethics program review during fiscal year 1998.

Figure 8: Implementation of Interim Rule Amendments

Note: 447 officials answered this question.

There was a high correlation between those who reported significant problems still exist in providing annual verbal briefings to non-SF 278 filers and those who had not implemented the interim training amendments. Over two-thirds who still had significant problems in providing these verbal briefings also reported that the interim regulations had not been implemented.

We also found that officials who indicated that the interim amendments had not been implemented were more likely to want OGE to provide training methods for their use before groups of employees in classroom settings, including videos, lectures, and group discussions with case studies. Those who had implemented the interim regulations more often indicated that they want OGE to provide interactive computer-based training, which is a more individualized training method. It may be that those who have taken advantage of the relief offered by the interim amendments are also thinking ahead to how employees can obtain training by themselves, thus freeing ethics officials to concentrate on other aspects of the ethics program such as providing advice or helping employees in other ways to prevent conflicts of interest.

Most reported successes in the operation
of their ethics program, but some
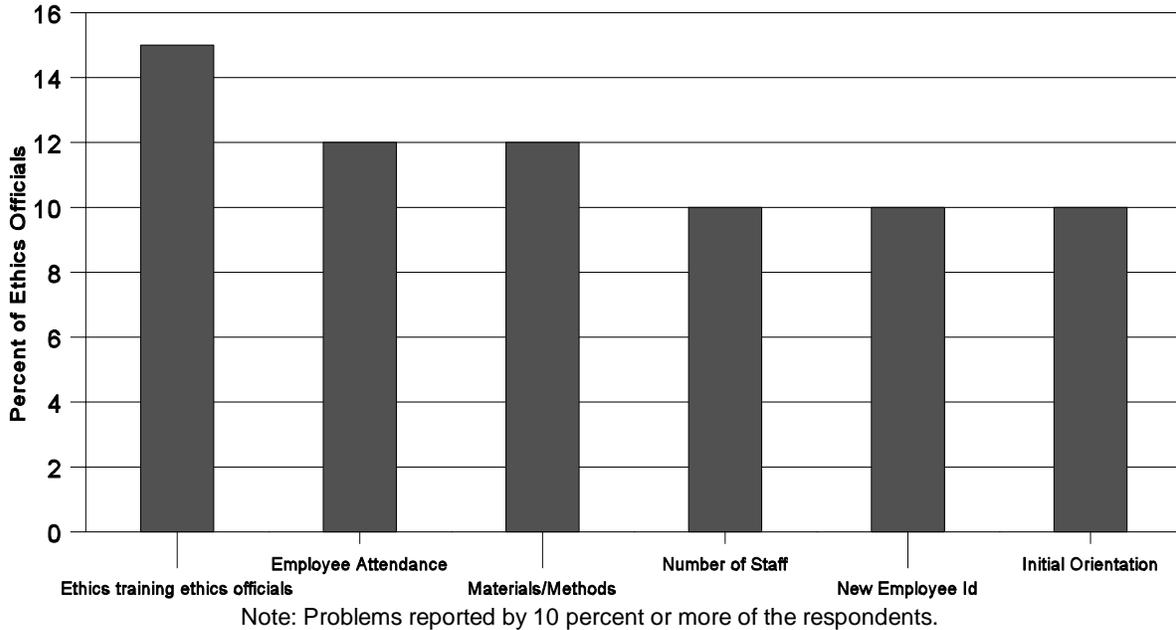significant problems still exist

Ethics officials were asked their views on the operation of various facets of their field office's ethics program. Their opinions were sought to identify program requirements and related functions for which they had experienced relative success and for which significant problems remain.

Most ethics officials experienced success in the operation of their field office's ethics program; however, many noted continuing problems they need to address. More than 70 percent of the officials reported experiencing no significant problems in each of the 16 program requirements and related functions studied.[6] As an additional indicator of success, many officials reported that significant problems that had existed, such as confidential financial disclosure report collection and employee attendance at training, had been resolved. Overall, over 80 percent of the ethics officials reported that they were successful in each of the program requirements and related functions studied.

The high success rates reported for most program requirements and related functions was encouraging; however, in almost every area studied, at least some ethics officials indicated that significant problems still exist. As shown in Figure 9, 10 percent or more reported continuing significant problems in 6 of the program requirements and related functions studied. For example, 15 percent identified ethics training for ethics officials as an area in which they are still experiencing significant problems. Again, those who reported that personnel specialists administer their program more frequently reported that this problem continues. Also as previously mentioned, ethics training for ethics officials was identified most often as the one affected by budget reductions.

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[6]The 16 program requirements and related functions studied include: public financial disclosure report collection and report review, confidential report collection and report review, new employee identification, initial ethics orientation, annual verbal briefings for SF 278 filers, annual verbal briefings for non-SF 278 filers, annual written briefings for non-SF 278 filers, employee attendance at ethics training, number of ethics staff, experience of ethics staff, communications with the DAEO, ethics training for ethics officials, materials/methods for conducting training, and ethics advice and counseling.

Figure 9: Continuing Significant Problems

Note: Problems reported by 10 percent or more of the respondents.

Also as shown in figure 9, 12 percent of the officials identified employee attendance at ethics training and materials/methods for conducting ethics training for employees as areas in which they are still experiencing significant problems. We found that many of the officials who reported these continuing employee training problems had not implemented the 1997 interim training amendments, which were designed to help provide relief from the problems associated with conducting annual verbal briefings for non-SF 278 filers.

Written comments provided by ethics officials most often identified insufficient or no ethics training for ethics officials; an insufficient number of experienced staff to administer the program; a lack of relevant and interesting training materials; a lack of employee commitment to attend training; and the burden of too much time and effort required to collect and review confidential financial disclosure reports as problem areas.

Reported impact
of budget reductions

Ethics officials were asked to what extent field office or agency budget reductions had negatively affected their office's ethics program in the last year and, if so, what aspects of the ethics program had been affected.

About 17 percent of the ethics officials indicated that budget reductions had had at least some negative effects on the operation of their field office's ethics program, as shown in Figure 10. Ethics training for ethics officials was identified most frequently by these officials as the aspect of the ethics program that had been negatively affected, as shown
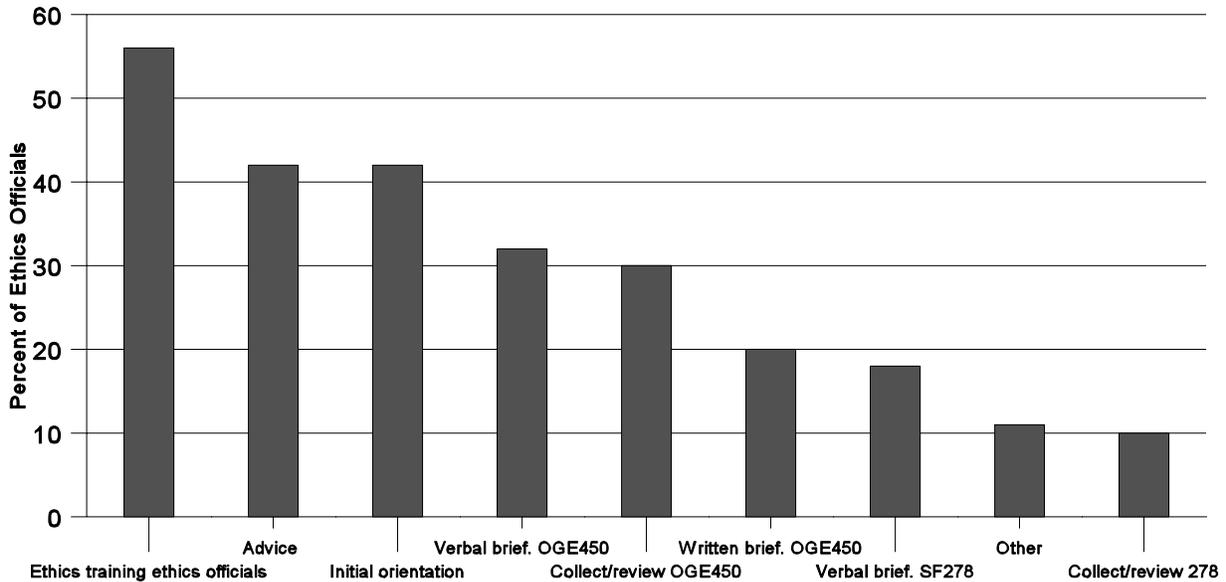
in Figure 11. Providing ethics advice and counseling and initial ethics orientation were also identified frequently.

Figure 10: Effect of Agency Budget Reductions on Ethics Program
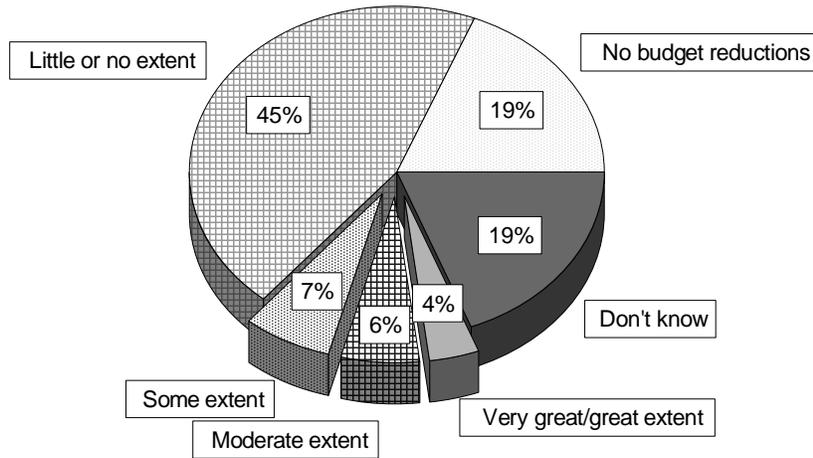
Note: 450 officials answered this question.

Figure 11: Aspects of Ethics Program Negatively Affected by Budget Reductions

Note: Percentages are of officials who reported negative effects of budget reductions.

Not surprisingly, we found that programs administered by personnel specialists were more likely to have experienced negative effects from budget reductions. In the last few years, many Federal jobs have been targeted as "overhead" jobs for cuts, personnel specialists among them. Last year, OGE found this specific problem during our program review at the Department of Agriculture (USDA). We found that as part of reorganizations

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and downsizing, USDA consolidated certain personnel offices in order to "streamline" the performance of all personnel-related functions, including ethics. These cutbacks resulted in the ethics program not being sufficiently staffed to effectively administer the program.

Most of the ethics officials who indicated negative effects on their ethics program because of budget reductions offered insight into the steps they have taken to cope with reduced funding. These included reducing the amount of in-person training provided, increasing the use of videos and computer-based training, and increasing the use of written materials. These steps are also the things that were encouraged by the 1997 interim rule amendments to OGE's ethics training regulation. Although ethics training for ethics officials was identified most often as the program aspect affected by budget reductions, none of the comments mentioned any steps taken to cope with that problem, perhaps because ethics officials thought it was not within their control.

Additional training needs
assessment information

Ethics officials were also asked several additional questions as part of OGE's training needs assessment to identify what types of training methods they would like OGE to provide and which computer-related capabilities are available to the employees in their field office.

The overwhelming majority of the officials, 89 percent, identified videotapes on a variety of ethics-related materials as the training method they would like OGE to provide, as reflected in Figure 12. Also, nearly half identified interactive computer-based training, while about one-third selected satellite broadcast and group discussions with case studies.

Figure 12: Respondent Choices for Types of Training Methods
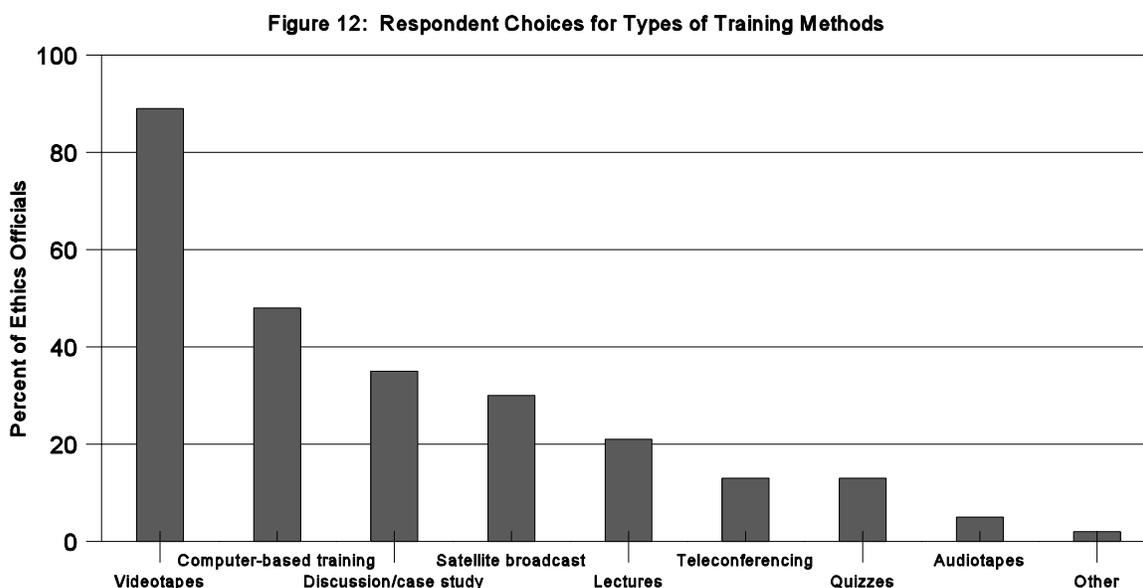
Note: Respondents could give more than one response.

Regarding computer-related capabilities, most officials identified a computer with Internet access (71 percent) and external E-mail capabilities (77 percent) located at each employee's desk as the computer set-up available to employees in the field office who are required to receive ethics training. Officials also identified CD-ROM players and computers with audio or video capabilities as available to a much lesser extent, located either at the employee's desk or shared among several employees. Windows 95 was the operating system most often identified as currently being in use (62 percent), with Windows 3.1 used less frequently (25 percent).

Ethics officials have
the last word

We offered ethics officials the opportunity to have the last word.   When asked what ideas they had regarding how OGE or their own agency can help to improve the administration of field office ethics programs, ethics officials reiterated many of the ideas that they had identified previously in the survey. They suggested that OGE:

-provide regional training opportunities for ethics officials,

-develop and provide videos and computer-based training modules,

-develop and distribute relevant and interesting training materials,

-disseminate more ethics information and materials via OGE's Web site,

-simplify and clarify ethics program requirements including those for the collection and review of confidential financial disclosure reports, and

-maintain a direct link with field offices by directly disseminating information to them and obtaining input from them.

Officials also repeated that they would like their agency headquarters and field offices to provide additional assistance, give the program higher visibility so that employees and managers understand the importance of compliance, and share information on the interpretation of ethics laws and regulations for consistency of providing ethics advice.

CONCLUSIONS AND RECOMMENDATIONS

Our survey of field office ethics officials has provided an interesting insight into ethics programs that are separated from the agency headquarters elements. The responses, across the board, revealed a high degree of satisfaction with almost all aspects of the program. This high level of satisfaction included satisfaction with the organizational location of the program within the field offices, the adequacy and experience of staff administering the program, the level of support received from the local field office and from agency headquarters management, the adequacy of ethics-related materials and

information available to the field offices, and the level of ethics training provided to ethics officials. While satisfaction was generally very high, there were several areas of possible improvement that the officials pointed out.

In the administrative area - organizational location, staffing level, job discipline of ethics officials in charge, and support from field office and agency management - about 90 percent indicated satisfaction with their current status. However, the level of satisfaction for programs located in personnel or "other" offices or administered by a personnel specialist (rather than located in legal offices or administered by legal staff) was significantly lower. Further, while about 80 percent of the officials believed that the degree of support received from their agency management both at the local and headquarters levels was satisfactory, about half indicated that additional assistance from their management in areas such as training for ethics officials and in disseminating ethics information would be beneficial. Further, these officials indicated that the program could be improved through greater visibility within their agency.

In the area of ethics training for ethics officials, about 80 percent of the officials believed that the field office ethics staff was adequately trained. However, 13 percent believed training for ethics officials was not adequate. Those indicating that training was not adequate were more often from programs administered by personnel specialists and were often from offices whose agencies had been negatively affected by budget reductions. Interestingly, both groups-satisfied and dissatisfied with training-were interested in additional training opportunities and provided suggestions as to which topics would be most beneficial. The identification of their training-related needs provided the basis for OGE's annual training needs assessment.

Officials generally believed that they had sufficient information and materials at their disposal to provide ethics advice and to answer questions that arose. However, for every topic surveyed, there was at least some level of dissatisfaction. As we noted in several other areas, the level of satisfaction with the available materials was less for officials from programs administered by personnel specialists. An interesting (or discouraging) point that also came out of the responses in this area was that 25 percent were not aware of OGE's Web site and another 31 percent, while aware, had never used the site. Expanding the use of OGE's Web site could serve to mitigate a myriad of access to information problems now encountered, including obtaining DAEOgrams on interpretation of ethics laws and regulations and on regional training sessions.

Most officials considered their program successful. However, many still reported continuing significant problems. For example, 12 percent identified employee attendance at ethics training as a continuing problem; however, it should be noted that many of these same officials reported that the 1997 interim training amendments had not been implemented in their office. Other problems identified by officials included inadequate ethics training for ethics officials, a lack of interesting and relevant training materials and the latest instructional methods, a lack of employee commitment to attending training, and the burden of collecting and reviewing confidential financial disclosure reports.

Finally, several officials indicated continuing negative affects on their programs from budget reductions. The programs thus affected seem to be more often administered by personnel specialists. As noted above, offices administered by personnel specialists have taken the brunt of budget reductions in many agencies.

In light of the results of our survey, we recommend that OGE:

-issue a DAEOgram reminding DAEOs of their responsibility to disseminate ethics program and training information to field office ethics officials;

-conduct additional regional training sessions for ethics officials on a variety of identified topics and ensure that field office officials are informed of the training sessions;

-develop and distribute additional training materials using videotapes and computer-based modules for use by field offices for conducting employee training;

-pending the final results of our survey on agency implementation of the 1997 interim training amendments, issue a DAEOgram reminding DAEOs to again consider implementing the interim amendments in order to allow their field offices to take advantage of the relief offered by the amendments;

-provide feedback directly to the field office officials who participated in this survey - notifying them of the results of this survey, informing them of the contents of and benefits of using OGE's Web site to obtain access to essential ethics program information and developments, and urging them to take advantage of the other various mechanisms provided by OGE to help reduce the ethics program workload;

-continue to periodically assess field office ethics program training needs; and

-continue to periodically monitor the impact of budget reductions on agency ethics programs, especially those programs administered in personnel offices or by personnel specialists.

Attachments

APPENDIX I

SCOPE AND METHODOLOGY

To accomplish the survey objectives, we sent an anonymous questionnaire to 523 primary ethics officials at field office ethics program locations throughout the country. We requested that the questionnaire be completed by the individual primarily responsible for the field office's ethics program. In addition to the initial questionnaire mailing in May 1998, one follow-up mailing was conducted in June 1998.

To identify the population for this survey, in 1997 we conducted a location survey to identify full service field office ethics program locations throughout the country and the primary ethics official in charge of each program. The location survey was sent to agency DAEOs in Washington, DC, asking them to confirm (from a previously developed list) or identify their field office locations that had ethics programs that collect, review, and retain financial disclosure reports or conduct ethics training, in addition to providing oral and written advice.

The results of the location survey showed that 523 offices at 20 civilian departments and agencies have full service field office ethics programs. Only responses that met the survey criteria and contained complete name and address information were included in the population.

The departments and agencies included in the population are:

Agency for International Development
Department of Agriculture
Department of Energy
Department of Health and Human Services
Department of Housing and Urban Development
Department of the Interior
Department of Justice
Department of Labor
Department of Transportation
Department of the Treasury
Department of Veterans Affairs
Environmental Protection Agency
General Services Administration
National Aeronautics and Space Administration
National Credit Union Administration
National Labor Relations Board
Nuclear Regulatory Commission
Small Business Administration
Social Security Administration
U.S. Postal Service

The results of the survey discussed in this report are based on responses from the 470 ethics officials representing agencies that completed and returned the questionnaire by July 17, 1998, a response rate of 90 percent. The survey results presented in this report represent the responses received.

The survey questions sought to obtain information and opinions on: (1) field office ethics program structure and staffing, (2) program successes and problems, (3) satisfaction with field office and executive branch agency management support, (4) ethics training for ethics officials, (5) materials and methods for conducting employee ethics training, (6) effects of budget reductions, (7) implementation of interim rule training amendments, and (8) other operating issues that directly affect field office ethics programs. Questions were also included to fulfill OGE's annual training needs assessment. During the design of our survey we conducted pretests of the questionnaire with field office ethics officials.

Questions in which ethics officials could choose more than one response are noted. Percentages in these figures will not total to 100 percent. All percentages are based on the number of ethics officials who answered each question, which in some cases was fewer than the total number of ethics officials that responded to the questionnaire. For many questions in the questionnaire, ethics officials chose from five response categories so that their answers would closely reflect their views. However, we collapsed categories on some questions for clearer reporting. For some questions, "no basis to judge" responses were eliminated in order to more clearly present opinions of those ethics officials who expressed an opinion on the issues.

APPENDIX II

LOCATIONS FOR TWO- TO THREE-DAY ETHICS TRAINING CLASSES

Ethics officials were asked if they would be interested in attending a two- to three-day ethics training class and, if so, in which **one** of a list of cities they would probably attend. If the city in which their office was located was not listed, they were asked to select the **one** city to which they would probably be authorized to go for the training.

In addition to the 352 valid responses listed below, we also received several multiple-selection responses that could not be incorporated into this list because our data base was designed to accept only one city selection for this question. Additionally, several officials refused to answer this question, noting that answering it would provide OGE with a means of identifying the respondent.

Rank	City	Responses
(9)	Albuquerque,NM	16
	Anchorage, AK	7
(2)	Atlanta, GA	35
	Billings, MT	3
(8)	Boston, MA	18
(7)	Chicago, IL	19
	Cleveland, OH	9
(4)	Dallas/Fort Worth, TX	23
(6)	Denver, CO	20
	Indianapolis, IN	4
(3)	Kansas City, KS/MO	24
	Las Vegas, NV	9
	Los Angeles, CA	5
	Memphis, TN	3
	Miami, FL	8
	Minneapolis, MN	5
	New Orleans, LA	10
	New York, NY	9
	Oklahoma City, OK	3
(10)	Philadelphia, PA	15
	Phoenix, AZ	5
	Pittsburgh, PA	9
	Portland, OR	6
	Salt Lake City, UT	5
	San Diego, CA	4
(5)	San Francisco, CA	22
	San Juan, PR	2
	Seattle, WA	13
(1)	Washington, DC	41