

A Vision for Ethics Program Management: Benchmarking Success

**A Report on the Cabinet Agencies'
Incorporation of the Critical Success Factors
for Ethics Program Management**

December 2010



INTRODUCTION

To realize long-term ethics program effectiveness and to foster an ethical culture, an agency must not only be in compliance with ethics laws and regulations but must also develop strategies for addressing factors that are critical to the success of an ethics program. These success factors, identified in conjunction with the primary ethics officials at the fifteen Cabinet-level agencies, are as follows:

- Leadership—agency leaders and supervisors support and are involved in the program
- Awareness—employees are aware of the ethics program and its role and their personal ethical responsibilities
- Resources—agency and ethics community resources are leveraged
- Oversight—internal controls and oversight of the ethics program are established

To advance this vision for successful ethics program management within the executive branch, OGE embarked on a project to benchmark the Cabinet-level agencies' incorporation of the success factors into their ethics programs and to identify concrete actions the agencies have taken to address each of the success factors. The results of the project are contained in this report.

This report consists of three parts:

- (1) Benchmarking Results: Critical Success Factors
- (2) Critical Success Factors: Concrete Actions
- (3) Comparative Data.

The information presented will allow agencies to learn how other agencies have incorporated the critical success factors and compare themselves to similarly situated agencies. However, not all of the concrete actions identified in this report are suited to every agency. Incorporation of the critical success factors requires careful, ongoing assessment of the program and the development of agency-specific strategies.

Our thanks to each of the agencies for the time and effort they spent in completing the self-assessment questionnaire as well as the follow-up interviews. Their assistance was critical to the success of this project.

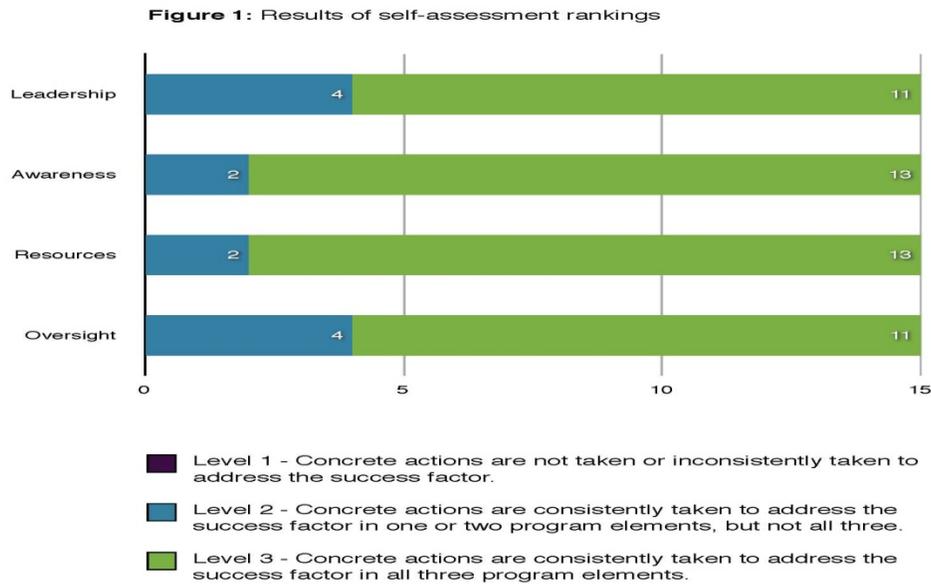
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PART ONE: BENCHMARKING RESULTS: CRITICAL SUCCESS FACTORS

In consultation with the Cabinet agencies, OGE identified four critical success factors: *leadership, awareness, resources, and oversight*. OGE developed a tool to benchmark the level at which agencies are addressing the factors that lead to a successful ethics program. OGE defined three levels and asked agencies to select for each success factor the level most representative of their respective agency. The three levels are differentiated based on the consistency at which concrete actions are taken to address the success factor in the areas of financial disclosure, ethics counseling, and ethics training.

Figure 1 shows the level at which the agencies ranked themselves for each critical success factor. The majority of the agencies ranked themselves at a level three, which means that they are consistently taking concrete actions to address each of the critical success factors. However, for each of the critical success factors, there were agencies that ranked themselves at a level two indicating that they are consistently taking concrete actions to address the critical success factors but in only one or two of the program element areas. Notably, none of the agencies ranked themselves at a level one for any of the success factors.



PART TWO: CRITICAL SUCCESS FACTORS: CONCRETE ACTIONS

Based on the responses provided by the agencies, OGE identified the following categories of concrete actions for each critical success factor:

Leadership	Awareness	Resources	Oversight
Visible Support	Distribution of Ethics-Related Information	Participation in Ethics-Related Events	Financial Disclosure and Training Tracking Systems
Access	Marketing the Ethics Program	Collaboration within the Ethics Community	Standard Operating Procedures
Involvement in Managing the Ethics Program	Training	Relationships within the Agency	Program Reviews
Budgetary Support		Searchable Advice and Counsel Databases	Peer Reviews
Awards and Ratings Linked to Compliance with Ethics Requirements		Electronic Filing Systems	Customer Feedback

OGE selected 18 examples of common and less common concrete actions agencies may want to consider incorporating into their ethics programs. OGE also created nine information graphics to assist agencies in comparing their ethics program to the other Cabinet agency ethics programs.

Based on the written responses from the agencies and commentary collected during the interview phase of this project, OGE identified concrete actions agencies are taking to address the critical success factors. The concrete actions listed in this report are not a complete collection of actions an agency can take to address each of the success factors, rather they are a compilation of the most common or the most innovative based on an analysis of the information collected from the agencies. In this section, we will define each of the critical success factors, identify categories of common concrete actions, and highlight specific practices agencies may want to consider incorporating into their ethics programs.

LEADERSHIP (Support of and involvement in the program by agency leaders and supervisors)

It is critical that agency leadership at all levels show support for and involvement in the ethics program. Ethics program activities and requirements do not operate in a vacuum. Employees face competing demands for their time and attention. Cues from agency leaders as to which responsibilities take precedence exert a strong influence on employees' decisions. Even well-designed ethics initiatives, therefore, will have a limited impact if employees view the initiatives as peripheral or a hindrance to an agency's mission.

We have identified five categories of common concrete actions that agency leaders and supervisors are taking to show support and involvement in the ethics program. The five categories are (1) visible support, (2) access, (3) involvement in managing the ethics program, (4) budgetary support, and (5) awards and ratings linked to compliance with ethics requirements.

Visible Support

Thirteen agencies believe leadership visibly demonstrated support for their ethics program. Visible support of the ethics program has come from agency leaders in a variety of ways, such as delivering messages in-person to employees at ethics training sessions about the importance of ethics, by appearing in videos used at ethics training sessions, by sending e-mails to all employees discussing the importance of ethics, by issuing written statements on ethics, and by discussing ethics in speeches. Agencies commented that communication from leadership on the importance of ethics sets the tone from the top and demonstrates that ethics applies to everyone in an agency. Some agencies also commented that a message about the importance of ethics from an agency leader can increase employees' confidence in leadership and increase employees' sensitivity to ethical conduct as it relates to their own work.

FOR YOUR CONSIDERATION

At the Department of the Interior, Secretary Salazar issued a Secretarial Order to enhance and promote an ethical culture by clarifying the roles and responsibilities of all employees, Deputy Ethics Counselors, Bureau Heads, the Designated Agency Ethics Official (DAEO), and Assistant Secretaries. As part of the Order, employees are required to read the Department of Interior's Ethics Guide, to take responsibility for knowing and understanding the ethics laws, and to seek guidance from the ethics office when ethics questions arise. Bureau Heads must employ a full-time Deputy Ethics Counselor at the GS-14 level or higher, provide adequate support staff for the Deputy Ethics Counselor, require supervisors and managers to work with their Deputy Ethics Counselor to ensure that appropriate controls are in place to avoid conflicts of interest and, in consultation with their Assistant Secretary, provide an annual assessment of their ethics program to the DAEO each October. Assistant Secretaries must provide oversight and management to ensure that the Bureau Heads within their organization fully comply with the Order. The DAEO is required to regularly advise the Secretary regarding all aspects of the Departmental ethics program, provide input to Bureau Heads on appropriate ethics

program management elements to be included in the performance standards for their Deputy Ethics Counselors, and convene a working group of senior career and non-career employees to provide suggestions and ideas to assist the DAEO in adopting and implementing best practices to enhance the existing ethics program of the Department. The Order was distributed by press release, posted on the agency's website, highlighted in the agency's ethics newsletter, and discussed in ethics training sessions.

Access

All 15 agencies reported that they have access to their agency's leadership. Realizing that access to agency leadership can be gained in a number of different ways, ethics officials at seven agencies indicated that they gained access by making presentations at senior staff meetings on a regular basis to brief leadership on emerging ethics issues or trends identified through ethics counseling. Other agencies reported that they gained access to agency leadership by reviewing the Secretary's upcoming schedule for ethics issues and briefing the Secretary's staff, providing ethics training at senior staff meetings, assisting leadership on their new entrant public financial disclosure reports, and working directly with the agency's Deputy Secretary or Chief of Staff.

Involvement in Managing the Ethics Program

Fourteen agencies mentioned that leadership, upon request, will become involved in the follow-up process for non-responsive public and confidential filers of financial disclosure reports. The different methods of involvement in this process include sending e-mails to filers and visiting filers in-person about their late reports.

All 15 agencies involve supervisors in some way to help administer portions of their ethics program. For example, 11 of the agencies reported that supervisors take an active role in reminding their employees to timely file their financial disclosure reports by sending verbal or email reminders, or both, when necessary and collecting delinquent financial disclosure reports when needed. At one agency, supervisors are personally involved in counseling employees who file their reports late. In addition to their involvement in the financial disclosure program, supervisors at several agencies are also actively involved in ensuring that their employees comply with the annual ethics training requirements by attending ethics training with their employees and directing employees to seek ethics guidance as individual concerns arise.

FOR YOUR CONSIDERATION

At the Department of Justice, ethics officials provide a two-hour ethics training module as part of a newly developed New Supervisor's Training program within the Justice Management Division. The New Supervisors training is expected to be offered two to three times a year based on number of new supervisors. The training provides a basic review of the ethics statutes, the Standards of Conduct, and agency policies and procedures. As part of the training, the ethics office emphasizes the importance of supervisors being familiar with the rules; modeling that knowledge through their own

actions; and knowing when to refer employees to the ethics office for information or consultation.

At the Department of Labor, leadership is a part of the process for collecting financial disclosure reports. The ethics office sends out the form six weeks in advance of the due date followed by multiple reminders. In addition, the ethics office encourages leadership to send positive messages like “the filing cycle is upon us, make sure to file on time.” As a result, the number of delinquent filers has greatly reduced. The percentage of public filers complying with the filing deadline has improved from 97% to 100%, and the percentage of confidential filers complying with the filing deadline has improved from 94% to 100%. The ethics office attributes this success to a combination of allowing additional time to file at the front end of the filing cycle, granting extensions to file in only the most extenuating circumstances, and appropriate reminders from senior officials. As for collecting the rare delinquent report, the filers receive reminders from the Financial Disclosure Program Manager, followed by the Alternate Designated Agency Ethics Official, the Designated Agency Ethics Official and finally the supervisor.

Budgetary Support

Eight agencies reported leadership approval of funding for an increase in full-time ethics staff over the past few years. For two of those agencies, approvals for a significant increase in staff came as a result of media attention regarding ethics issues at their agency. Two of the agencies specifically received funding from agency leadership for a financial disclosure program manager. In contrast, several agencies noted that obtaining budget resources, particularly for additional staff positions and to pay for technology-related projects, has been a challenge.

Only one agency reported having a separate budget solely devoted to the ethics program.

FOR YOUR CONSIDERATION

At the Department of Defense, the ethics office was successful in obtaining funding from agency leadership for a Financial Disclosure Program Manager. To gain leadership support for funding this GS-15 position, the Department of Defense ethics office developed a business case. The business case included the mission of the agency, quantitative data and a cost-benefit analysis. The business case not only cited the large number of financial disclosure filers at the agency but also emphasized the impact of the upcoming Presidential Transition on resources. They explained that the agency would experience a complete turnover in political personnel requiring staff to provide post-employment counseling to departing staff as well as vet new political appointees. The ethics office found this to be a successful model for gaining resources.

Awards and Ratings Linked to Compliance with Ethics Requirements

Several agencies link awards, bonuses, promotions, or performance ratings to compliance with ethics requirements. For example, four agencies vet award nominees for compliance with

the ethics requirements prior to bestowing service awards. For certain employees such as financial disclosure filers, members of the Senior Executive Service, and military personnel, three agencies consider whether the employee is in compliance with ethics requirements as part of the decision to award a promotion or bonus.

Five agencies factor compliance with ethics requirements into performance ratings. Some of the agencies stated that individual employee performance appraisals include a generic component for compliance with ethics requirements. Others reported the inclusion of a specific ethics component in the performance appraisal of SES employees. A few agencies are considering including a specific ethics compliance component in the performance appraisal of SES or other senior level employees. One agency is also considering the inclusion of a specific ethics compliance component in the performance appraisal of all General Schedule employees.

FOR YOUR CONSIDERATION

At the Department of State, compliance with filing requirements is considered when awarding promotions and bonuses to public financial disclosure filers. Each year, the Human Resources (HR) office asks the ethics office to review its files and advise whether it is aware of any basis that might warrant limiting favorable personnel actions to senior employees eligible for promotions and bonuses. The ethics office provides a list of employees who have not complied with the requirement to file a public financial disclosure report to HR. HR makes the independent decision whether to withhold bonuses or promotions; the ethics office understands that the practice has been to withhold them when financial disclosure reports have not been filed. As employees comply with their filing requirements, the ethics office provides updated information to the HR. Once the employee has complied with their filing requirement; the bonus or promotion process is continued. However, the ethics office noted that it is not aware of any Department regulation that would preclude the employees who have failed to timely file their financial disclosure reports to be disqualified from being promoted or receiving annual bonuses. This practice has been ongoing in the Department for at least six years. The ethics office believes that there is a correlation between this practice and compliance with filing requirements.

At the Department of Veterans Affairs, prior to nominating a Senior Executive Service (SES) employee for a Presidential Rank award leadership asks the ethics office to confirm that the SES employee is in compliance with annual financial disclosure reporting and ethics training requirements. This process has been in place for several years. Last year, leadership asked the ethics office to confirm that an SES employee is in compliance with annual financial disclosure reporting and ethics training requirements prior to awarding a bonus or salary increase. In connection with this process, the ethics office began reminding public filers that not complying with the financial disclosure and training requirements may affect their ability to receive certain awards.

AWARENESS (Awareness of the ethics program and its role)

Description: Employees should be aware of the ethics program and its role and their personal ethical responsibilities. Building awareness can raise the visibility of the ethics program, foster an ethical culture, and minimize risk to the agency and its employees.

We identified three categories of common concrete actions that agencies are taking to build awareness of the ethics program and its role. The three categories are (1) distribution of ethics-related information, (2) marketing the ethics program, and (3) training.

Distribution of Ethics-Related Information

Agencies identified various methods for distributing ethics-related information such as email, newsletters, dedicated ethics internet or intranet pages, and internal satellite television networks. All of the agencies use email to distribute information to employees. A common use of email is to remind financial disclosure filers of upcoming due dates and common reporting mistakes. Agencies also stated that they send periodic memoranda to employees on topics such as the gift rules during the holiday season. Seven of the agencies reported that they either publish an ethics newsletter or contribute to an agency newsletter. Some of the ethics officials reported difficulty in consistently publishing articles because of competing priorities. All of the agencies have a dedicated ethics page on either the agency’s public website or intranet. Nine of the agencies indicated that they have a public website whereas eight mentioned that they have an ethics webpage on the agency’s intranet.¹ Agencies include a wide range of information and resources on these sites such as memoranda from agency leadership, guidance on common issues and links to financial disclosure forms and training modules. Three of the agencies use an internal satellite television network or an “on-demand” training system to deliver training to employees who are widely dispersed throughout the United States and abroad.

FOR YOUR CONSIDERATION

At the Department of the Treasury, ethics officials publish a quarterly dedicated ethics newsletter that is printed in-house and distributed in paper format to all employees at headquarters through inter-office mail. It is also posted electronically on the Treasury intranet ethics web site. The newsletter includes highlights of timely ethics topics, a clever advice column, contact information, and a puzzle or trivia feature. Ethics officials stated that the ethics office generally sees an increase in telephone calls or e-mail inquiries shortly after a new issue of the newsletter is distributed. The ethics office has found that employees have increased familiarity with the ethics staff as a result of the newsletter.

¹ Two of the agencies said that they have an ethics page on their agency’s intranet and public website.

Marketing the Ethics Program

Agencies identified various ways of marketing the ethics program such as posters and promotional materials. Eight agencies reported using ethics posters to increase employee awareness of their ethical responsibilities as well as the ethics office. Most of the posters include contact information for the ethics office and are located in various locations throughout the agencies. Five agencies use promotional products such as pens, post-it notes, lanyards and fortune cookies as a way to increase awareness of the ethics program. Some ethics officials, however, expressed skepticism as to the effectiveness of using promotional products as a way to increase awareness.

FOR YOUR CONSIDERATION

At the Department of the Interior, the ethics office converted several OGE posters into “Splash Screens.” A splash screen is the first image employee’s view on their computers upon signing on to the agency computer system. The ethics office worked with the agency’s National Business Center and Chief Information Officer to design and incorporate contact information on the posters and disseminate the splash screens.

Training

Agencies mentioned that they believe offering additional opportunities for training leads to increased awareness of the ethics rules and ethics staff. All of the agencies provide targeted training to employees upon request. Agencies mentioned that they provide targeted training for various groups including procurement personnel, the Office of the Inspector General, supervisors, candidates for the SES, and Federal advisory committees. Ten agencies mentioned that they encourage other employees, beyond those required to receive training, to attend training sessions.

FOR YOUR CONSIDERATION

At the Department of Agriculture, the ethics office developed a curriculum for all political appointees that consist of four, in-person, one-hour courses. The ethics office sought and obtained commitment from the agency’s White House Liaison that approximately 270 incoming political appointees would undergo the four-course curriculum. The first course in the curriculum, “Boulders in your Path”, a general ethics orientation course. The remaining three courses focus on gifts, conflicts of interest and political activities. The agency also offers appointees the opportunity to take elective courses such as Agency Gifts and Appropriations and Post-Government employment. The curriculum does not count as the appointee’s annual ethics training. The ethics office believes that this program provides a good opportunity to raise the visibility of the ethics program among senior leadership.

At the Department of Education, the ethics office, at the request of the Chief of Staff, delivered “Ethics Refreshers” to political appointees. The ethics office provided these “Ethics Refreshers” in addition to annual ethics training and covered the rules on gifts from outside sources, conflicts of interest, and the Hatch Act. The ethics office believes that the additional training is more relevant because employees can see the relationship between the ethics rules and their work.

RESOURCES (Leverage agency and ethics community resources)

Description: It is critical that ethics programs leverage resources inside an agency and within the ethics community. Planning how to strategically take advantage of existing resources can eliminate duplicative efforts, maximize efficiency, and facilitate information sharing. To leverage internal agency resources, the ethics program should strive to forge formal relationships with human resources officials, information technology personnel, and the Office of the Inspector General. Additionally, duties and responsibilities of regional and component ethics officials should be designed to maximize efficiency. To leverage external resources, ethics officials should tap into the executive branch ethics community, which is filled with knowledge, expertise and resources. By using these resources, ethics officials can find solutions related to training, tracking systems, and model practices without expending their agency’s finite resources.

We identified five categories of common concrete actions that agencies are taking to leverage external and internal resources. The five categories are (1) participation in ethics-related events, (2) collaboration within the ethics community, (3) relationships within the agency, (4) searchable advice and counsel databases, and (5) electronic filing systems.

Participation in Ethics-Related Events

All 15 agencies leverage ethics community resources by participating in ethics-related events such as the OGE National Government Ethics Conference² and Interagency Ethics Council³ meetings. Ethics officials explained that attending ethics-related events outside of their respective agencies helps them stay informed of broad trends, identify practices that can be implemented at their own agency, identify products in use at other agencies, and further their knowledge of the ethics rules. Some agencies stated that these events provide the opportunity to network with ethics officials.

² OGE has been hosting a conference for ethics officials from throughout the executive branch since 1991. The conference serves to inform ethics officials about the application of ethics-related laws and regulations and provides participants with an opportunity to discuss ethics issues common to the executive branch.

³ The Interagency Ethics Council (IEC) supports lawyers and other federal government employees who work in the area of ethics for government employees. The IEC holds monthly meetings which offer a forum for the exchange of information and publishes a journal at <http://www.iecjournal.org/iec/>.

Collaboration within the Ethics Community

All 15 agencies leverage external resources by collaborating with other agencies on ethics-related issues. Ethics officials explained that this collaboration can take the form of informal calls on an occasional basis to more formal collaboration such as partnerships with other agencies on emerging ethics issues.

FOR YOUR CONSIDERATION

The Department of Defense collaborated with the Environmental Protection Agency and the Federal Emergency Management Agency within the Department of Homeland Security to develop training on the use of social media. Recently, these agencies co-presented on the topic of social media at the OGE National Government Ethics Conference. The presentation focused on ethics-related issues to consider when implementing a social media policy.

Relationships within the Agency

All 15 agencies have leveraged internal agency resources by fostering relationships with at least one internal office. Eleven agencies reported having a productive relationship with their respective Office of the Inspector General. In addition, some agencies mentioned working particularly well with their agency's White House Liaison, information technology departments, print departments, and public relations offices. Agencies mentioned that their ethics programs receive benefits from having a productive relationship with at least one internal office. For example, several agencies mentioned receiving funding and assistance in the form of (1) in-house studio time for filming ethics training, (2) in printing of materials, and (3) electronic filing systems.

Eleven agencies characterized their relationship with Human Resources as positive or relatively positive. Most ethics officials stated that they rely on Human Resources to obtain information such as who is required to file public and confidential financial disclosure reports as well as when employees enter or terminate their official position.

Searchable Advice and Counsel Databases

Ten agencies reported having a searchable database for advice and counsel rendered. These systems include commercial databases, systems created in-house and networked folders. Agencies commented that databases are helpful in maintaining consistency and minimizing the time spent researching recurring issues.

Electronic Filing Systems

Electronic filing systems remain relatively rare; only one agency uses an electronic filing system throughout the agency⁴. However, several agencies reported that some of their components use electronic filing systems. Seven agencies reported they are working towards creating an e-filing system. Two agencies reported that funding constraints have prevented them from creating an electronic filing system.

OVERSIGHT (Establish internal controls and oversight of the ethics program)

Description: Ethics program oversight and internal controls can lead to continuity in program administration, consistency in carrying out ethics functions, accountability in the performance of duties, and increased compliance.

We identified five categories of common concrete actions that agencies are taking to establish internal controls and oversight of the ethics program. The five categories are (1) financial disclosure and training tracking systems, (2) standard operating procedures (3) program reviews, (4) peer reviews, and (5) customer feedback.

Financial Disclosure and Training Tracking Systems

All 15 agencies use a tracking system for financial disclosure filing and ethics training to maintain oversight of the ethics program. These systems range from commercial products (e.g. Excel, Access, and Lotus Notes) to products created in-house.

FOR YOUR CONSIDERATION

At the Department of Energy, the ethics office uses an agency-wide tracking system for financial disclosure and training. The tracking system is linked to the payroll system which enables the ethics office to capture salary actions, new hires and terminations. The tracking system is also capable of sending mass emails, such as reminders to employees of their obligation to attend annual ethics training as well as a notice of receipt to financial disclosure filers when the report has been submitted. The tracking system is also capable of automatically uploading the names of individuals who have completed online training modules.

⁴ Electronic filing involves electronic completion of the form with electronic signing by the filer, followed by an electronic certification by the reviewing official(s), and storage of the report in an electronic storage system. An electronic filing system would not allow a filer to e-mail an electronically fillable (but not electronically signed) form to the reviewer. Likewise, it would not allow the electronic forwarding of an electronically scanned paper report to a reviewer. (DAEOgram # DO-07-014)

Standard Operating Procedures

Eleven of the agencies said that they have standard operating procedures (SOPs). Agencies have SOPs in the areas of financial disclosure, training and advice and counsel. One agency reflected that SOPs were instrumental in maintaining the continuity of operations during a sudden change in staff. Several agencies expressed the need to update their SOPs.

Program Reviews

Seven of the agencies conduct internal program reviews to maintain oversight of their ethics program.

FOR YOUR CONSIDERATION

At the Department of Health and Human Services, a three-person Program Review Section of the Ethics Division conducts on-site reviews of the ethics programs of component offices. The Program Review Section visits each component every 4 years and on average conducts 9 to 14 reviews a year. In conducting its internal ethics program reviews, the agency uses its own Program Review Guidelines. A copy of these guidelines is sent to the component being reviewed as part of the standard review process so that component ethics officials can prepare for the upcoming review. In addition, a copy of the guidelines is also maintained on the agency's ethics intranet site so component ethics officials can conduct their own assessment of their program's performance.

At the Department of Veterans Affairs, the ethics office performs on-site reviews of the 22 Regional Counsel Offices that administer ethics programs in the field. The agency spent two and a half years developing the program. Two staff members from the ethics office are sent on each review along with a staff attorney from one of the other regional offices. The ethics office noted that the inclusion of a regional staff attorney is a beneficial practice because the attorney is able to add a valuable perspective to the review, and the attorney learns about practices in use elsewhere and can share ideas with colleagues in other regions. Prior to the on-site visit, the ethics office reviews a sample of financial disclosure reports from the region to be reviewed. Once on site, the reviewers examine the training procedures, review advice and counsel, and interview employees. Within a week of the review, the ethics office produces a quick "out brief" report and three months later issues a formal report. The ethics office follows up on deficiencies and recommendations noted in the report. The ethics office said they benefit from conducting these reviews as they use them as an opportunity to learn what they can do to better support ethics officials in the field. For example, a new Sharepoint site originated from requests by field ethics officials for sample documents.

At the Department of Energy, the ethics office performs on-site reviews of field offices. In addition to reviewing financial disclosure and, advice and counsel they provide assistance in the areas of awareness, resources, and leadership. For example, as part of the program reviews, the ethics office discusses actions that the field counsel can take to raise the visibility of the ethics program. The ethics office also provides resource materials so that the field office can leverage the expertise of the headquarters ethics office. At the conclusion of the on-site review, the ethics office drafts a report based on findings of the review. Finally, the ethics office meets with the Manager at the field office, and if necessary, advocates for additional resources on behalf of the ethics program.

Peer Reviews

Seven of the agencies said they use formal and/or informal peer review processes to review financial disclosure reports and advice and counsel provided to employees.

FOR YOUR CONSIDERATION

At the Department of Veterans Affairs the review of financial disclosure reports is assigned to a different reviewer each filing cycle as a quality assurance practice.

At the Department of Commerce, at least two ethics officials review all written advice rendered by staff attorneys. Although, two people review the advice, it may be after, rather than before the advice is rendered. The advice is reviewed by the Division Chief and the Assistant General Counsel. The ethics office noted that review after the fact for less complicated and less significant issues ensures that responses are provided as quickly as possible. Follow-up e-mails are sent as soon as possible if a substantive error is identified or clarification is needed. The ethics office noted that such corrections and clarifications are relatively rare.

At the Department of Housing and Urban Development, at least two ethics officials review advice and counsel prior to rendering written advice to an employee. The ethics office maintains a one to two day response time for most written advice. Ethics officials commented that having a second perspective on outgoing written advice ensures consistency, thoroughness, and encourages an ongoing dialogue within the ethics office. Occasionally the reviewing attorney sees a new angle or has a thought-provoking question for the originating attorney. The ethics office finds that the use of peer review leads to consistency and has not negatively impacted their ability to timely respond to request for advice and counsel.

Customer Feedback

Nine agencies solicit and receive feedback from their employees through the use of evaluations and surveys. Ethics officials have used feedback from training evaluations to make changes to training materials. One ethics office mentioned that they used the results of training

feedback to advocate for the inclusion of ethics in their agency's new supervisor training program.

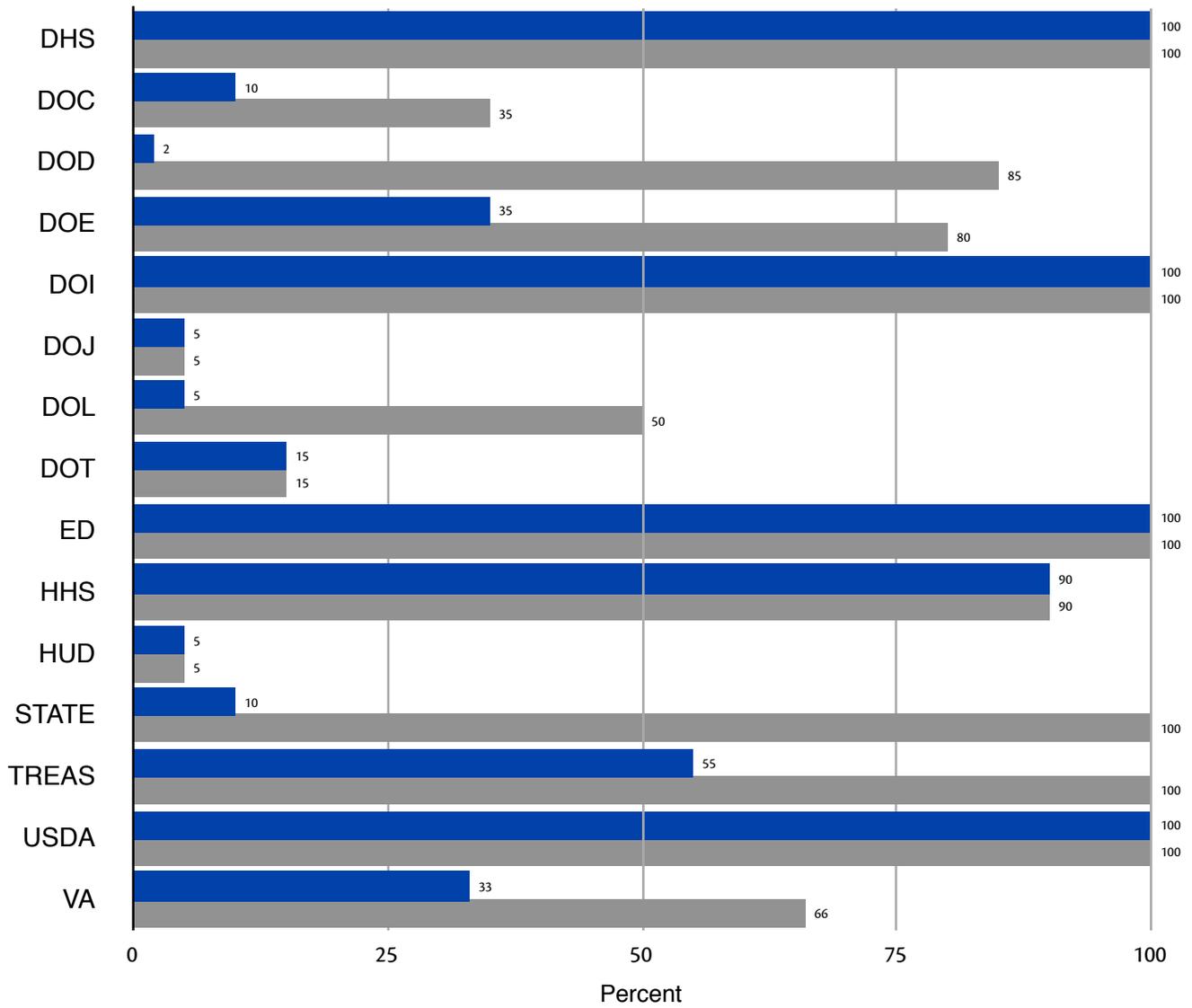
FOR YOUR CONSIDERATION

At the Department of Agriculture, the ethics office solicits customer feedback by including a link to a customer satisfaction survey at the bottom of each email sent by the ethics staff. The survey asks for feedback on the following areas: promptness of initial response, knowledge/experience of advisor, thoroughness of advice/action, courteousness of advisor, professionalism of advisor, and overall quality of service. The Office of Ethics' Deputy Director receives all of the comments from the surveys and submits the responses to the Office of Ethics' Director and to the Deputy Director of the Office of Human Resource Management.

PART THREE: COMPARATIVE DATA

OGE created information graphics based on information provided in the *2009 Agency Ethics Program Questionnaire*. The graphics compare the percentage of time the Designated and Alternate Agency Ethics Officials spend on ethics and their grade level, the number of full-time employees, the ratio of full-time employees to ethics officials, percentage of employees who file financial disclosure reports, the ratios of public and confidential financial disclosure filers to ethics official, and the average time spent on certain aspects of the ethics program. The data included is intended to allow agencies to easily compare important aspects of their ethics program with other Cabinet agencies. The quantitative data may be helpful to agencies in determining how best to allocate ethics program resources.

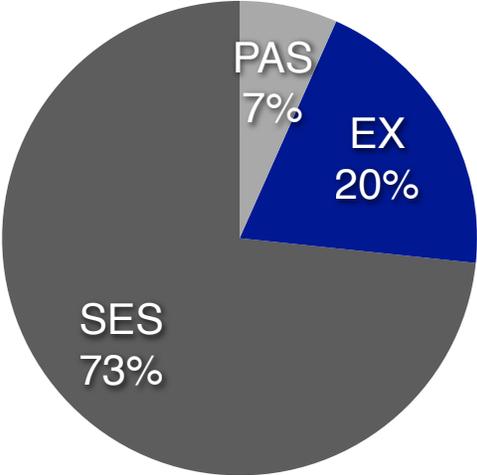
Figure 2: Percentage of Time DAEO and ADAEO Spends on Ethics



■ % of time the DAEO spent on ethics

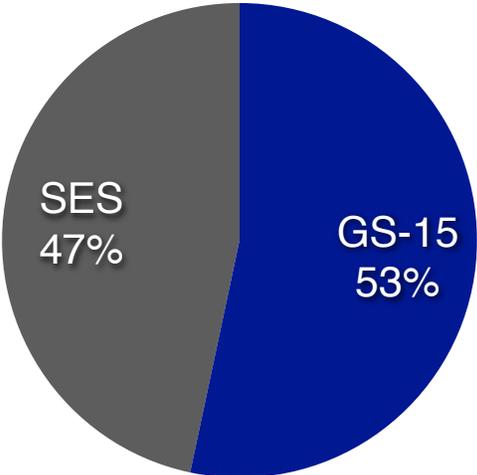
■ % of time the ADAEO spent on ethics

Figure 3: DAEO's Grade Level



At the Cabinet agencies, the DAEO position is occupied by individuals employed at the SES level or higher.

Figure 4: ADAEO's Grade Level



At the Cabinet agencies, the ADAEO position is occupied by individuals employed at the SES or GS-15 level in almost equal numbers.

Figure 5: Percentage of Employees Who File Financial Disclosure Reports

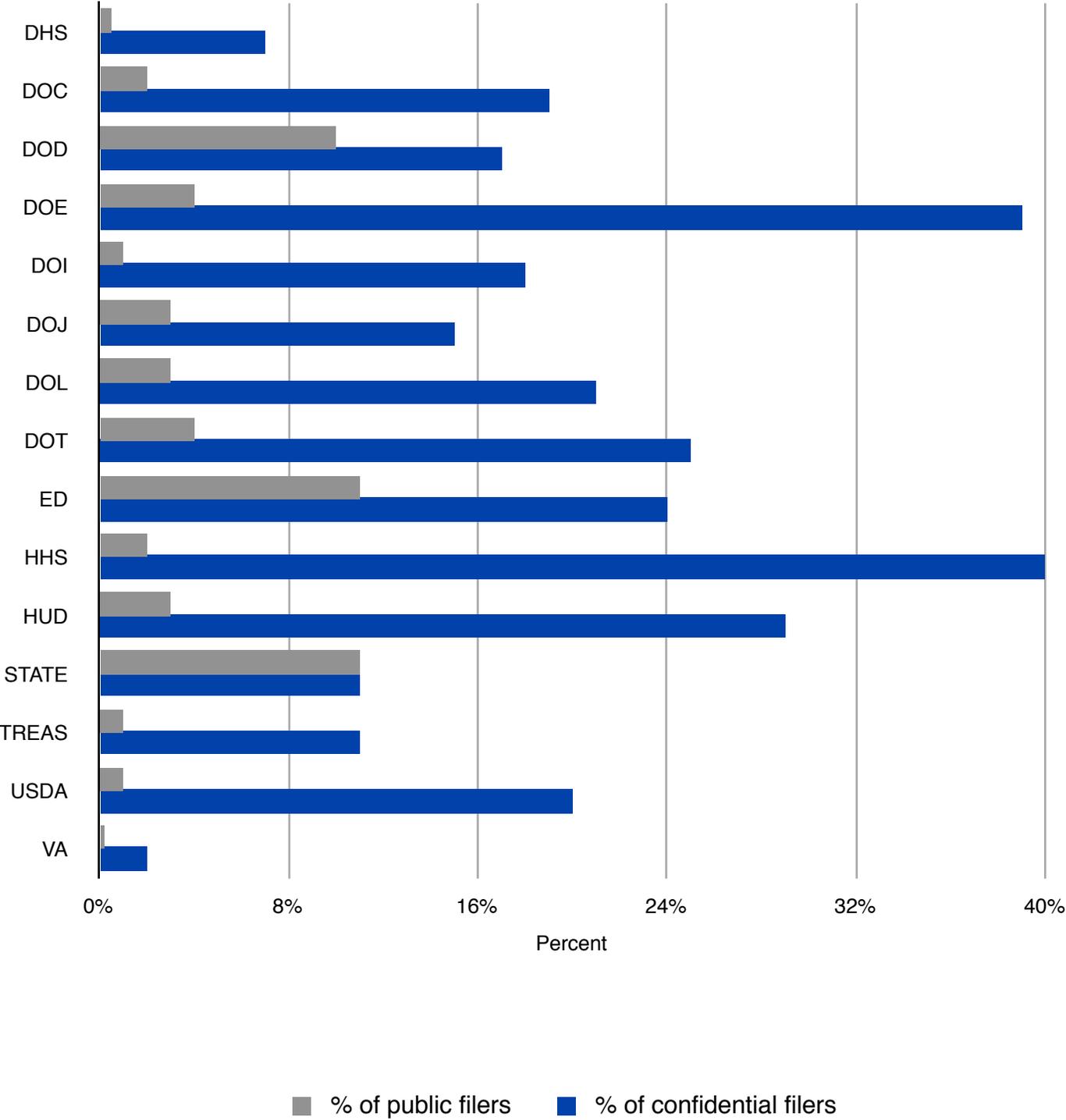


Figure 6: Number of Full-time Employees

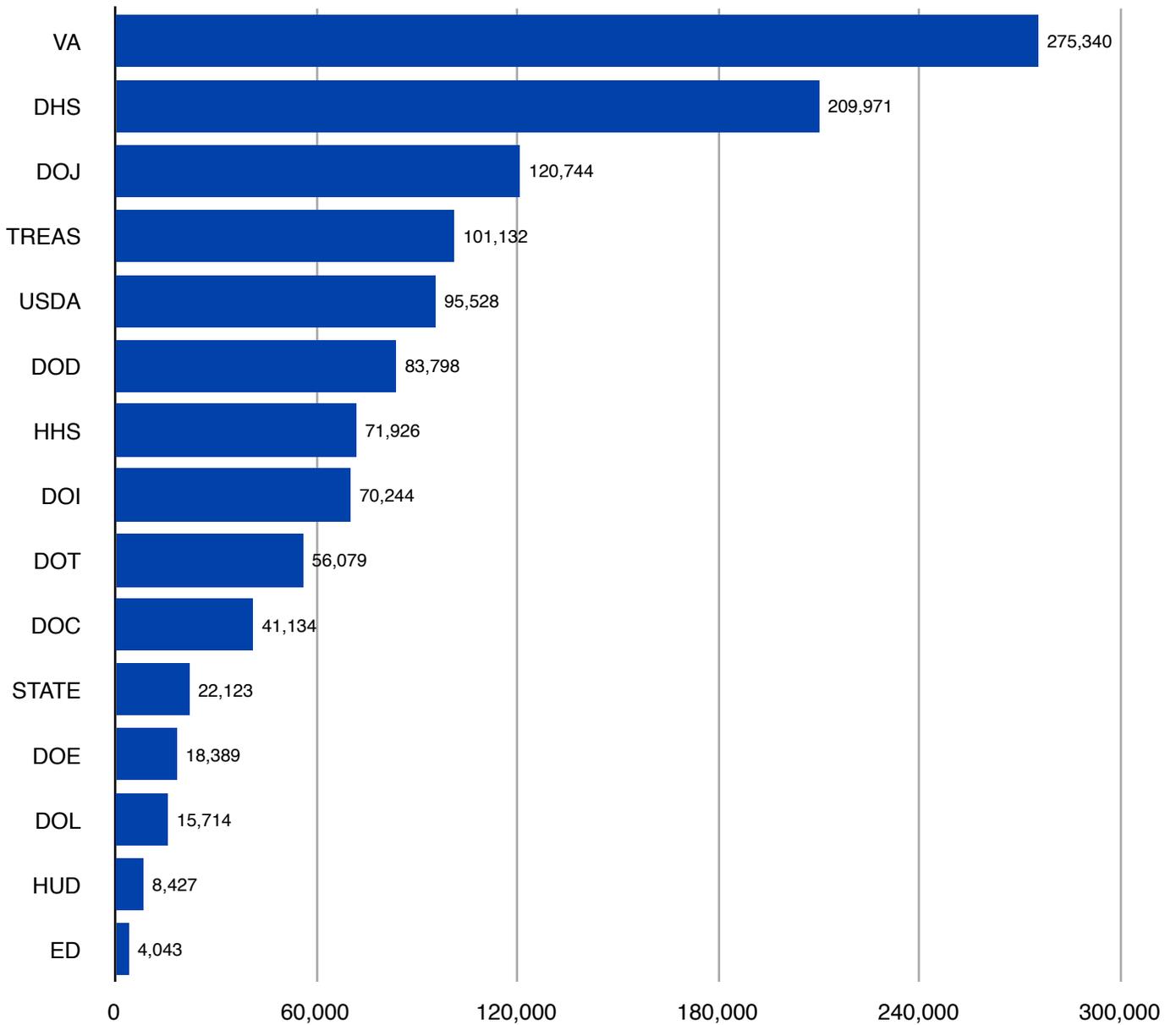


Figure 7: Number of Employees per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

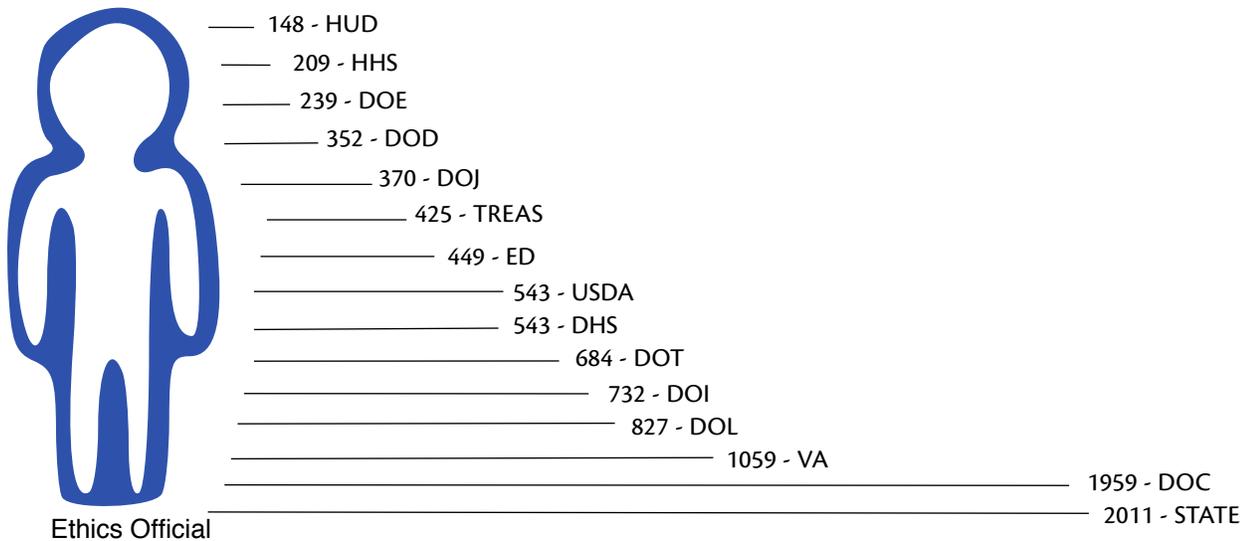


Figure 8: Number of Public Filers per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

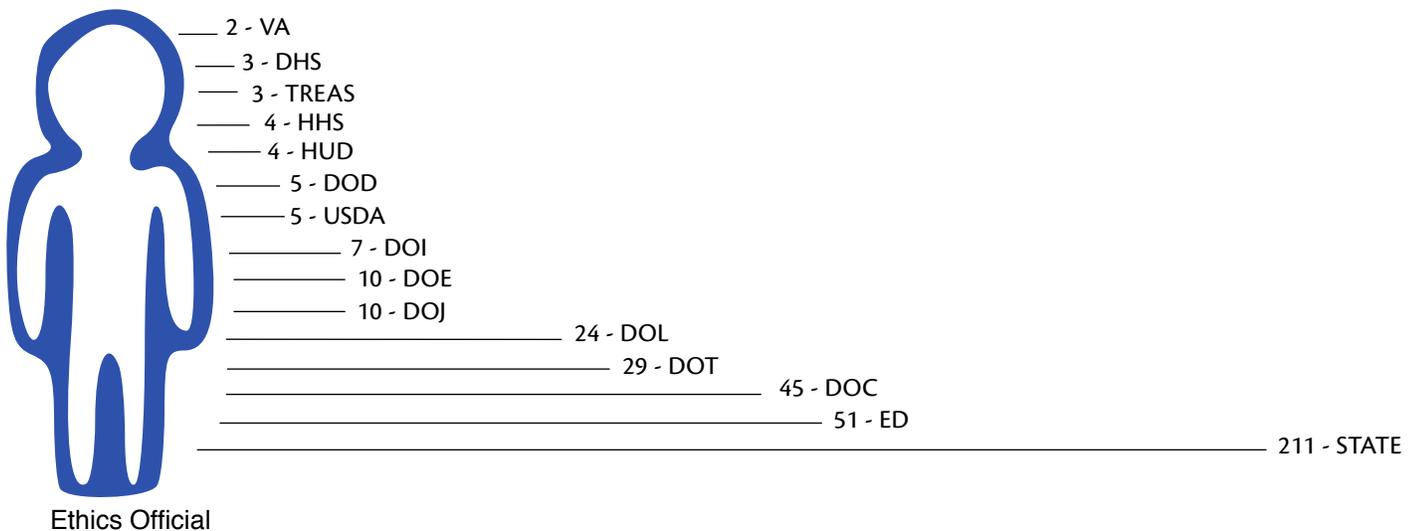


Figure 9: Number of Confidential Filers per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

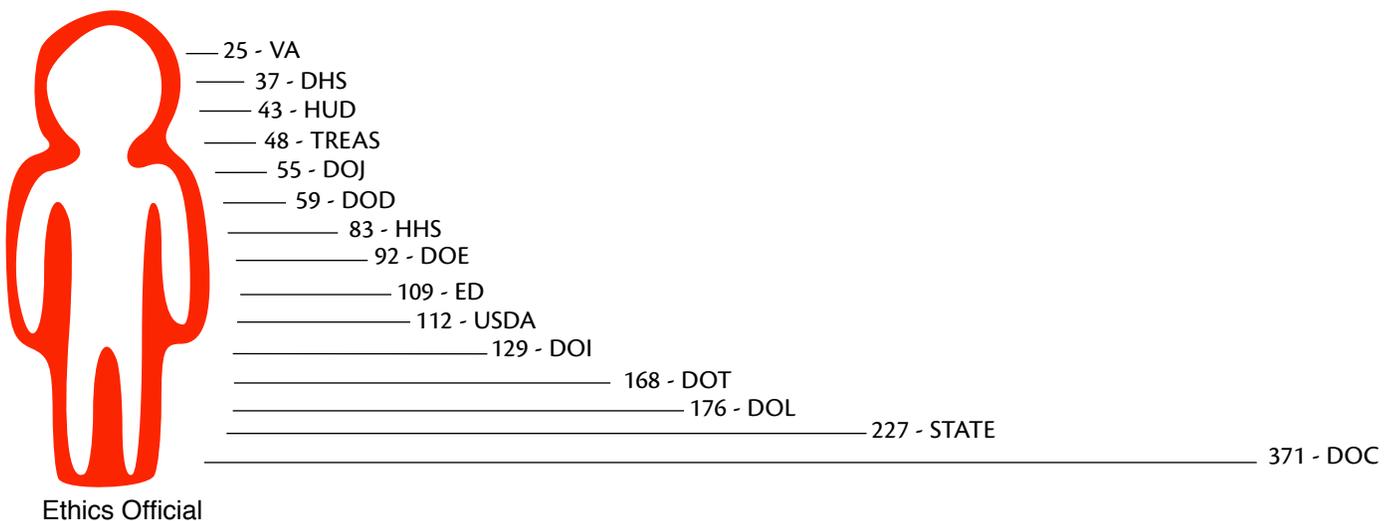
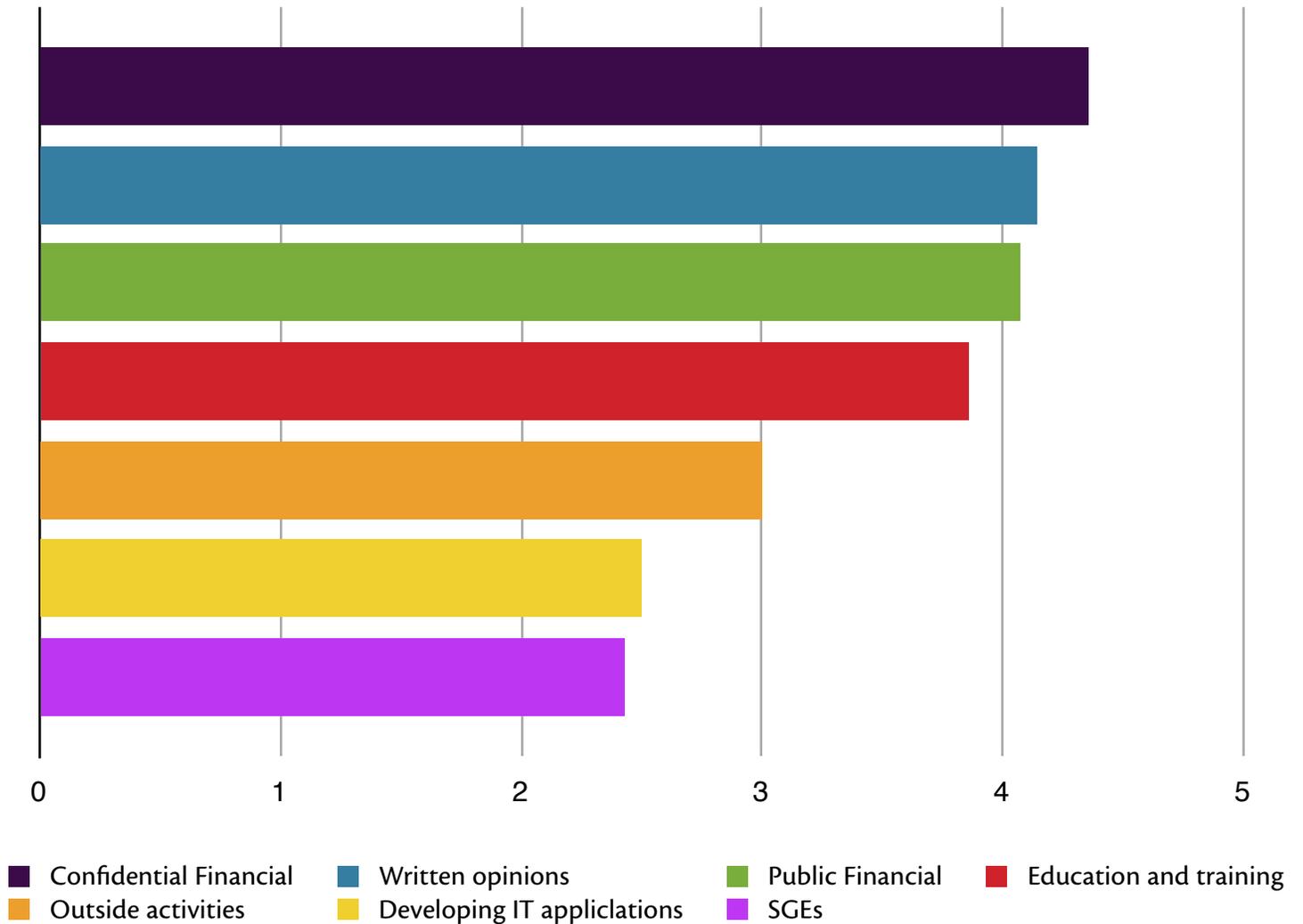


Figure 10: Average Time Spent on Aspects of the Ethics Program



Time Spent Scale: 1= No time, 2= Limited amount of time, 3= Moderate amount of time, 4= Considerable amount of time, 5= Extreme amount of time.

APPENDIX: AGENCY PROFILES



AGENCY PROFILE: DEPARTMENT OF AGRICULTURE

Full-time agency employees	95,528
Special Government employees	460
% of time DAEO spends on ethics	??
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	??
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	1 to 4 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	25	0	<u>25</u>
Region/Field	0	151	<u>151</u>
Total	<u>25</u>	<u>151</u>	<u>176</u>

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential and public financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: **862**

Total number of confidential financial disclosure filers: **19,720**

of advisory committees (non-FACA): 32

of FACA advisory committees: 64

of advisory committee member (non-FACA): 200

of FACA advisory committee members: 1,240

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF COMMERCE

Full-time agency employees	41,134
Special Government employees	288
% of time DAEO spends on ethics	10%
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	EX-0301-4/0
% of time ADAEO spends on ethics	35%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	ES-0905-0/0

	Full-time ethics staff	Part-time ethics staff	Total
HQ	20	1	21
Region/Field	0	0	0
Total	20	1	21

Regional or field ethics officials: __Yes No

Elements of ethics program administered by field/regional ethics officials: **N/A**

Frequency of headquarter communication with regional/field ethics officials: **N/A**

Total number of public financial disclosure filers: **953**

Total number of confidential financial disclosure filers: **7,799**

of advisory committees (non-FACA): 4

of FACA advisory committees: 61

of advisory committee members (non-FACA): 58

of FACA advisory committee members: 1,087

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)			<input checked="" type="checkbox"/>		
Confidential Financial Disclosure (450)				<input checked="" type="checkbox"/>	
Outside Activity approval programs	<input checked="" type="checkbox"/>				
Written opinions and counseling				<input checked="" type="checkbox"/>	
Education and Training			<input checked="" type="checkbox"/>		
Special Government employee activities		<input checked="" type="checkbox"/>			
Developing information technology applications		<input checked="" type="checkbox"/>			



AGENCY PROFILE: DEPARTMENT OF DEFENSE

Full-time agency employees	83,798
Special Government employees	389
% of time DAEO spends on ethics	2%
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	EX-II
% of time ADAEO spends on ethics	85%
Length of time ADAEO has held position	
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	21	91	112
Region/Field	5	121	126
Total	26	212	238

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential and public financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Monthly**

Total number of public financial disclosure filers: **1,171**

Total number of confidential financial disclosure filers: **13,279**

of advisory committees (non-FACA): 6

of FACA advisory committees: 63

of advisory committee members (non-FACA): 26

of FACA advisory committee members: 1,636

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF EDUCATION

Full-time agency employees	4,043
Special Government employees	11
% of time DAEO spends on ethics	100%
Length of time DAEO has held position	1-4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	1-4 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	<u>9</u>	<u>0</u>	<u>9</u>
Region/Field	<u>0</u>	<u>0</u>	<u>0</u>
Total	<u>9</u>	<u>0</u>	<u>9</u>

Regional or field ethics officials: __Yes No

Elements of ethics program administered by field/regional ethics officials: **N/A**

Frequency of headquarter communication with regional/field ethics officials: **N/A**

Total number of public financial disclosure filers: **454**

Total number of confidential financial disclosure filers: **982**

of advisory committees (non-FACA): 6

of FACA advisory committees: 13

of advisory committee members (non-FACA): 81

of FACA advisory committee members: 68

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)				<input checked="" type="checkbox"/>	
Confidential Financial Disclosure (450)				<input checked="" type="checkbox"/>	
Outside Activity approval programs				<input checked="" type="checkbox"/>	
Written opinions and counseling				<input checked="" type="checkbox"/>	
Education and Training			<input checked="" type="checkbox"/>		
Special Government employee activities			<input checked="" type="checkbox"/>		
Developing information technology applications			<input checked="" type="checkbox"/>		



AGENCY PROFILE: DEPARTMENT OF ENERGY

Full-time agency employees	18,389
Special Government employees	222
% of time DAEO spends on ethics	35%
Length of time DAEO has held position	5-9 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	80%
Length of time ADAEO has held position	5-9 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	5	5	<u>10</u>
Region/Field	0	67	<u>67</u>
Total	<u>5</u>	<u>72</u>	<u>77</u>

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential financial disclosure program
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **At least monthly (more frequent during financial disclosure report filing and ethics training)**

Total number of public financial disclosure filers: **775**

Total number of confidential financial disclosure filers: **7,082**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **21**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **634**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)				<input checked="" type="checkbox"/>	
Confidential Financial Disclosure (450)					<input checked="" type="checkbox"/>
Outside Activity approval programs				<input checked="" type="checkbox"/>	
Written opinions and counseling					<input checked="" type="checkbox"/>
Education and Training				<input checked="" type="checkbox"/>	
Special Government employee activities				<input checked="" type="checkbox"/>	
Developing information technology applications		<input checked="" type="checkbox"/>			



AGENCY PROFILE: DEPARTMENT OF HEALTH AND HUMAN SERVICES

Full-time agency employees	71,926
Special Government employees	10,345
% of time DAEO spends on ethics	90%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	90%
Length of time ADAEO has held position	1 to 4 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	115	168	283
Region/Field	0	61	61
Total	115	229	344

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential and public financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: 1,457

Total number of confidential financial disclosure filers: 28,416

of advisory committees (non-FACA): 3

of FACA advisory committees: 265

of advisory committee member (non-FACA): 5

of FACA advisory committee members: 2,012

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF HOMELAND SECURITY

Full-time agency employees	209,971
Special Government employees	180
% of time DAEO spends on ethics	100%
Length of time DAEO has held position	5-9 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	5-9 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	18	72	90
Region/Field	2	295	297
Total	20	367	387

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Public and confidential financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: **1,082**

Total number of confidential financial disclosure filers: **14,183**

of advisory committees (non-FACA): 12

of FACA advisory committees: 25

of advisory committee members (non-FACA): 768

of FACA advisory committee members: 488

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Full-time agency employees	8,427
Special Government employees	3
% of time DAEO spends on ethics	5%
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	SES
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	1-4 years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	4	11	15
Region/Field	1	41	42
Total	5	52	57

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential financial disclosure program
- Ethics advice and counseling
- Ethics education and training

Frequency of headquarter communication with regional/field ethics officials: **Monthly**

Total number of public financial disclosure filers: **237**

Total number of confidential financial disclosure filers: **2,427**

of advisory committees (non-FACA): 0

of FACA advisory committees: 1

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 20

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF JUSTICE

Full-time agency employees	120,744
Special Government employees	21
% of time DAEO spends on ethics	5%
Length of time DAEO has held position	1-4 years
Grade level of DAEO	Exec Level
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	Career SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	20	83	103
Region/Field	0	223	223
Total	20	306	326

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential financial disclosure program
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: **3,130**

Total number of confidential financial disclosure filers: **17,882**

of advisory committees (non-FACA): 1

of FACA advisory committees: 1

of advisory committee members (non-FACA): 20

of FACA advisory committee members: 33

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF LABOR

Full-time agency employees	15,714
Special Government employees	1,182
% of time DAEO spends on ethics	Position vacant
Length of time DAEO has held position	Position vacant
Grade level of DAEO	PAS
% of time ADAEO spends on ethics	50%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	3	2	5
Region/Field	0	14	14
Total	3	16	19

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential financial disclosure program
- Ethics advice and counseling
- Ethics education and training

Frequency of headquarter communication with regional/field ethics officials: **Weekly**

Total number of public financial disclosure filers: **462**

Total number of confidential financial disclosure filers: **3,347**

of advisory committees (non-FACA): 1

of FACA advisory committees: 11

of advisory committee members (non-FACA): 14

of FACA advisory committee members: 174

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					<input type="checkbox"/>
Confidential Financial Disclosure (450)					<input type="checkbox"/>
Outside Activity approval programs				<input type="checkbox"/>	
Written opinions and counseling					<input type="checkbox"/>
Education and Training					<input type="checkbox"/>
Special Government employee activities		<input type="checkbox"/>			
Developing information technology applications	<input type="checkbox"/>				



AGENCY PROFILE: DEPARTMENT OF STATE

Full-time agency employees	22,123
Special Government employees	99
% of time DAEO spends on ethics	10%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	1-4 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	11	0	11
Region/Field	0	0	0
Total	11	0	11

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials: **N/A**

Frequency of headquarter communication with regional/field ethics officials: **N/A**

Total number of public financial disclosure filers: **2,316**

Total number of confidential financial disclosure filers: **2,499**

of advisory committees (non-FACA): 22

of FACA advisory committees: 22

of advisory committee member (non-FACA): _____

of FACA advisory committee members: 542

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					<input type="checkbox"/>
Confidential Financial Disclosure (450)					<input type="checkbox"/>
Outside Activity approval programs			<input type="checkbox"/>		
Written opinions and counseling					<input type="checkbox"/>
Education and Training			<input type="checkbox"/>		
Special Government employee activities			<input type="checkbox"/>		
Developing information technology applications				<input type="checkbox"/>	



AGENCY PROFILE: DEPARTMENT OF THE INTERIOR

Full-time agency employees	70,244
Special Government employees	272
% of time DAEO spends on ethics	100%
Length of time DAEO has held position	1-4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	1-4 years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	8	14	<u>22</u>
Region/Field	1	73	<u>74</u>
Total	<u>9</u>	<u>87</u>	<u>96</u>

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Public and confidential financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: **630**

Total number of confidential financial disclosure filers: **12,426**

of advisory committees (non-FACA): 9 # of FACA advisory committees: 16

of advisory committee members (non-FACA): 139 # of FACA advisory committee members: 75

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF TRANSPORTATION

Full-time agency employees	56,079
Special Government employees	4
% of time DAEO spends on ethics	15%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	15%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	1	38	39
Region/Field	0	43	43
Total	1	81	82

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential and public financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Monthly***

Total number of public financial disclosure filers: **2,344**

Total number of confidential financial disclosure filers: **13,793**

of advisory committees (non-FACA): 1

of FACA advisory committees: 16

of advisory committee member (non-FACA): 6

of FACA advisory committee members: 1,677

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF TREASURY

Full-time agency employees	101,132
Special Government employees	44
% of time DAEO spends on ethics	54%
Length of time DAEO has held position	Less than 1 Year*
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	Position Vacant*
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	13	67	80
Region/Field	1	157	158
Total	14	224	238

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential and public financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Enforcement proceedings
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Weekly**

Total number of public financial disclosure filers: **831**

Total number of confidential financial disclosure filers: **1,416**

of advisory committees (non-FACA): 2

of FACA advisory committees: 21

of advisory committee member (non-FACA): 59

of FACA advisory committee members: 624

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: DEPARTMENT OF VETERANS AFFAIRS

Full-time agency employees	275,340
Special Government employees	1,507
% of time DAEO spends on ethics	33%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	66%
Length of time ADAEO has held position	1 to 4 years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	3	3	6
Region/Field	2	252	254
Total	5	255	260

Regional or field ethics officials: Yes No

Elements of ethics program administered by field/regional ethics officials:

- Confidential financial disclosure programs
- Ethics advice and counseling
- Ethics education and training
- Acceptance of travel payments

Frequency of headquarter communication with regional/field ethics officials: **Daily**

Total number of public financial disclosure filers: **442**

Total number of confidential financial disclosure filers: **6,502**

of advisory committees (non-FACA): 0

of FACA advisory committees: 23

of advisory committee member (non-FACA): 0

of FACA advisory committee members: 562

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)				██████████	
Confidential Financial Disclosure (450)					██████████
Outside Activity approval programs	██████████				
Written opinions and counseling				██████████	
Education and Training					██████████
Special Government employee activities		██████████			
Developing information technology applications			██████████		