WAYS OGE CAN HELP

• Briefings before and after the election
• Review of financial disclosure reports
• Consultations on prospective nominees
• “Blind” reviews of certain nominee reports
• Technical assistance with ethics initiatives
• Training and guidance on government ethics
• Training on Integrity (e-filing system)

PROCESS

• Provide Nominee Ethics Guide to nominee
• Initiate financial disclosure report in Integrity
• Release report to OGE and the agency
• OGE/agency work on report with nominee (multiple rounds over several weeks)
• OGE and agency draft ethics agreement
• OGE “preclears” report
• Senate holds hearings before Inauguration

TIMELINE

August
• Schedule an OGE briefing
September
• Receive training on Integrity
October
• Recruit ethics official
November
• Collect financial disclosure reports
December
• Increase volume of reports

ADDRESSING RISK FACTORS

• Risk: Too little time
  Send OGE as many reports as possible in November and early December
• Risk: Slow responses from nominees
  Emphasize the importance of responding promptly to questions about their reports
• Risk: Nominees’ resistance to resolving conflicts of interest
  Advise nominees early in the process that they and their spouses may be required to make changes to their financial interests
• Risk: Confidentiality concerns shorten timeframe for reviewing certain reports
  Request an initial “blind” review by OGE
• Risk: Issues arising from the complexity of ethics rules and the nominee process
  Detail an agency ethics official or hire an outside financial disclosure expert