

ANNUAL PERFORMANCE REPORT



OGE
U.S. OFFICE OF
GOVERNMENT
ETHICS

FISCAL
YEAR
2024



MISSION

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

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Section I - About U.S. Office of Government Ethics

OGE’s Mission

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.



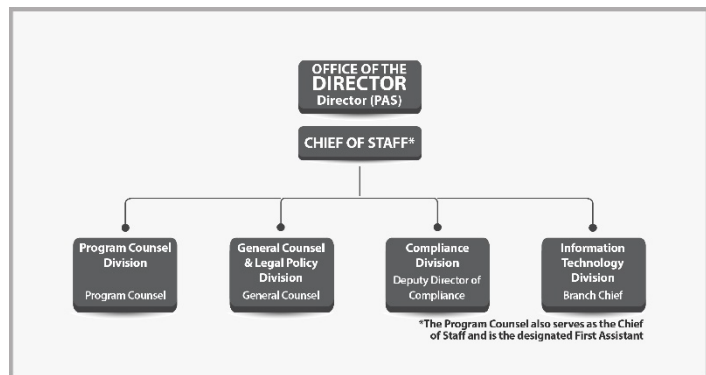
Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 140 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

Organizational Structure

Office of Government Ethics: A Small but Agile Agency

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five-year term by the President after confirmation by the Senate. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE’s career Chief of Staff and senior leadership, who work in concert to carry out OGE’s mission.



OGE and Executive Branch Agencies: A Shared Responsibility

Maintaining the trust of the citizens OGE serves is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.

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





The head of each agency is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE.

Each agency's employees, including supervisors, human capital officials, and the agency's Inspector General, play a significant role in maintaining the integrity of government programs and operations.

Further, OGE, and the ethics officials across the government, are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

Section II - Fiscal Year 2024 Performance Highlights

GOAL 1: Advanced a Strong, Consistent Executive Branch Ethics Program

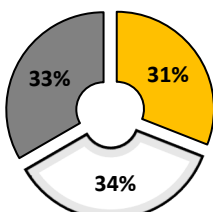
<p>Expert Support: Responded to 850 agency requests and 20 requests from Inspectors General offices</p> <p>Briefed 8 foreign delegations comprising 82 individuals representing 53 countries</p>	<p>Professional Development: More than 5,000 registrations</p> <div style="display: flex;"> <div style="flex: 1;"> <p><i>Executive Education:</i> Delivered direct multi-day orientations to nearly 60 new ethics leaders</p> </div> <div style="flex: 1;"> <p><i>Continuing Ed:</i> Maintained an on-demand library of ~150 videos watched 31,000 times</p> </div> </div> <p>Conducted 52 lectures, workshops, and interactive trainings</p> <p>Issued nearly 200 PEP certificates</p> <p><i>New/Emerging Leaders:</i> Offered four professional certificate programs</p>	<p>Guidance: Issued 18 Legal and Program advisories</p>  <p>Guidance: Published the Modernization Updates to the Standards of Conduct and four supplemental regulations</p>	<p>Financial Disclosure: Securely, operated <i>INTEGRITY</i>, the executive branch e-filing system for more than 90% of the 27,000 public financial disclosure filers and 39,000 users</p> 
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GOAL 2: Held the Executive Branch Accountable for Carrying Out an Effective Ethics Program

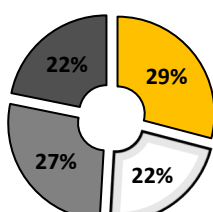
Program Reviews:

Conducted **43** reviews resulting in **70** recommendations

17 follow-up reviews resulting in **42** recommendations closed



3-year cycle* (see page 22)

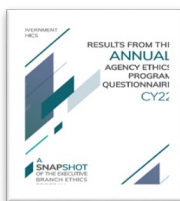


4-year cycle

■ Reviewed (FY22) ■ Reviewed (FY22)
 Reviewed (FY23) Reviewed (FY23)
 Reviewed (FY24) Reviewed (FY24)
 To be Reviewed (FY25)

Annual Data Call:

[100% Compliance from 142 agencies](#)



Annual Public Financial Disclosure:

Timely conducted second level review of **1,000+** reports

Sought feedback and updated the Public Financial Disclosure Form

Certificate of Divestitures (CDs): Issued **170** CDs

Conflict of Interest Waivers: Consulted on approximately **200** waivers and began to list the names of individuals issued conflict of interest waivers

GOAL 3: Helped Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership

Election Readiness:



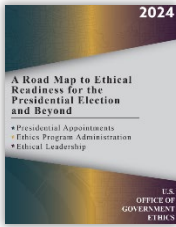
Training: Held Year Long Summit on Election Readiness, provided more than **40** offerings for nearly **5,000** registrants

Resources: Created or updated **key** election readiness resources including: A Road Map to Election Readiness for the Presidential Election and Beyond; Nominee Guide; Confidential and Public Financial Disclosure Guides; *INTEGRITY* User Guide; and Ethics Agreement Guide

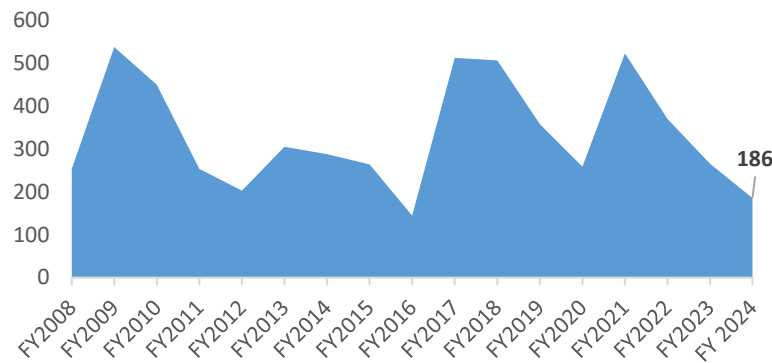
Guidance: Issued **10** advisories on election readiness topics

Participation: Served on the Agency Transition Directors Council

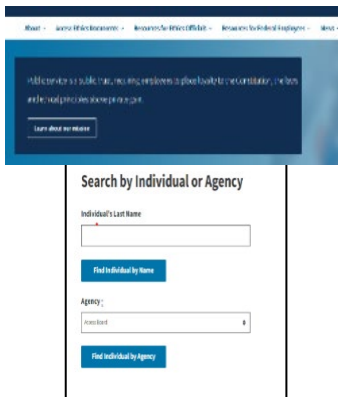
Financial Disclosure: Reviewed **53** Presidential and Vice Presidential Candidate Financial Disclosure Reports



of Nominee Financial Disclosure Reports (Pecleared)



GOAL 4: Used Transparency to Further the Oversight of the Executive Branch



Transparency:

Nearly **1.3M** pageviews of OGE's website

Released over **13,000** ethics documents

Responded to over **150** FOIA requests

Freedom of Information (FOIA)

FOIA requests are processed under the President John F. Kennedy Act, which is the law that gives the public the right to request Federal Government records.

Crosscutting Objective: Advance equity in OGE's programs and improve diversity, equity, inclusion, and accessibility in OGE's operations.



Equity:

Ethics Education: Held **4** Inclusion/Accessibility workshops to **120** ethics officials

Ethics Documents: Translated key ethics documents and simplified instructions

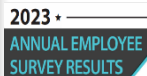
DEIA:

Ethics Officials: Held a mentoring program for **76** ethics officials

Procurement: **99%** of contracts and **26%** of micro purchases made from small/disadvantaged businesses

Stewardship: Sustained a high-performing, cross functional staff

Stewardship: Leveraged technology to increase efficiency and effectiveness



Engagement: **90%** on the FEVS Employee Engagement Index

Hiring: Onboarded **five** new employees and **two** interns from across the United States

Workforce Development: **100%** of employees participated in the employee development program

Replaced **all** end-of-life IT equipment

Migrated to a FedRAMP cloud service provider (completed in October 2023)

Responded to nearly **800** helpdesk calls

Stewardship: Safeguarded the government resources entrusted to OGE

Agency FINANCIAL REPORT

Received an **unmodified opinion** from its independent financial audit

Facilities: Reduced our HQ footprint by **70%**, resulting in **\$1,096,000** cost savings

Records: NARA assessed OGE's records program in NARA assessed OGE's records program in the "low risk category."

Privacy: Documented the privacy protections necessary for a number of essential agency programs, including the new legal expense fund program

Cybersecurity: "Managing risk" for the **majority** of categories on the Cybersecurity Risk Management Assessment

Section III - Fiscal Year 2024 Performance Report

It is OGE’s mission to safeguard the integrity of executive branch programs and operations and to increase public confidence in the impartiality of government decision-making. This important mission is translated into OGE’s strategic goals and objectives. OGE’s success in achieving these strategic goals and objectives is measured by its progress on established performance goals. In fiscal year 2024, OGE successfully continued delivering its mission-critical work. This section highlights OGE’s major accomplishments and progress toward achieving its strategic objectives in fiscal year 2024, as measured by its performance goals.¹ In fiscal year 2024, OGE met or exceeded one-hundred percent (100%) of its performance goals.

STRATEGIC GOAL I	STRATEGIC GOAL II	STRATEGIC GOAL III	STRATEGIC GOAL IV
<p>Advance a Strong, Consistent Executive Branch Ethics Program</p> <p>Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders.</p> <p>Strategic Objective 1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program.</p> <p>Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance.</p> <p>Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, <i>Integrity</i>.</p>	<p>Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program</p> <p>Strategic Objective 2.1: Monitor agency compliance with executive branch ethics program requirements.</p> <p>Strategic Objective 2.2: Monitor senior leaders’ compliance with individual ethics responsibilities and commitments.</p> <p>Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks.</p>	<p>Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership</p> <p>Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions.</p> <p>Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process.</p> <p>Strategic Objective 3.3: Foster ethical leadership in senior officials.</p>	<p>Use Transparency to Further the Oversight of the Executive Branch</p> <p>Strategic Objective 4.1: Make ethics information publicly available.</p> <p>Strategic Objective 4.2: Reach a broader array of stakeholders.</p>
<p>Crosscutting Objective 5.1: Advance equity in OGE’s programs and improve diversity, equity, inclusion, and accessibility in OGE’s operations.</p>			
<p>Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff.</p> <p>Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness.</p> <p>Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE.</p>			

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

Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program

OGE was created to prevent conflicts of interest on the part of executive branch employees. To achieve its strategic goal of advancing a strong, consistent executive branch ethics program, OGE developed four strategic objectives. These objectives are: (1.1) Provide expert guidance and support to ethics officials and other stakeholders; (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program; (1.3) Continuously refine ethics policy and issue interpretive guidance; and (1.4) Lead the financial disclosure program and provide the executive branch e-filing system, *INTEGRITY*.

Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders

OGE achieved its objective of providing expert guidance and support to stakeholders in fiscal year 2024 through quality Desk Officer services, communications with ethics officials and other external stakeholders, and support for the work of the enforcement and international communities. Key highlights of OGE's work are described below.

Supplied ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agencies' leaders and employees

OGE provides extensive support to agency ethics officials so they can provide consistent and effective ethics guidance to the more than 2.7 million federal employees in the executive branch who serve the American people. This support includes providing timely, expert advice on applying the ethics laws and regulations, as well as furnishing other resources ethics practitioners need to do their jobs effectively. In fiscal year 2024, OGE Desk Officers responded to nearly 850 calls for assistance. Fifty-eight percent (58%) of those requests were related to public financial disclosure, gifts from outside sources, and conflicts of interest. Desk Officers helped ethics officials navigate difficult policy and programmatic issues and proactively provided those officials with resources and services to assist them.

The absence of a strong, consistent executive branch ethics program with clear rules, guidance, support, training, and financial disclosure could lead to ethical lapses, improper use of taxpayer funds, and a loss of public confidence in government.

To support ethics officials in new leadership positions in fiscal year 2024, OGE sent a welcome letter to each new Designated and Alternate Designated Agency Ethics Official (DAEO/ADAEO) with critical details about their important roles, responsibilities, and

professional development opportunities, including OGE’s DAEO/ADAEO orientation program, and the array of resources OGE provides to support agency ethics officials. OGE Desk Officers met with new agency ethics officials to provide an overview of ethics program requirements and to offer OGE’s services.



DESK OFFICER ASSISTANCE

Performance Goal: OGE measured the performance of the Desk Officer program by surveying ethics officials who requested assistance during fiscal year 2024. Ninety-six

percent (96%) of survey respondents indicated that Desk Officers helped them to perform their job duties. Target: 80% | Actual: 96%

Communicated helpful, written guidance that was disseminated widely

In fiscal year 2024, OGE continued to provide ethics officials with up-to-date ethics information so that they can carry out effective programs for the employees they serve.

OGE published advisories and other guidance in a searchable format on its [website](#), and provided notices of new guidance via the OGE listserv, which reaches approximately 3,000 ethics officials and ethics



support staff. OGE also continued to host quarterly meetings with senior agency ethics officials to inform them of new guidance, resources, requirements, and trends.

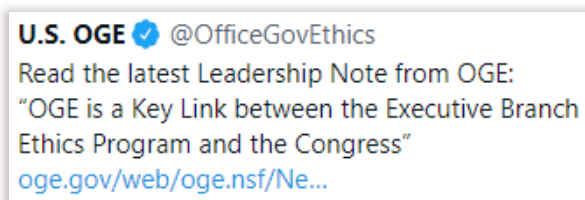
Indicators:

- 56% of ethics officials on the listserv
- 187 listserv messages

Responded to requests for expert advice from critical stakeholders

In fiscal year 2024, OGE continued to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, consistent understanding of the executive branch ethics program.

OGE serves as the legislative liaison with Congress for the executive branch ethics program. OGE works to build congressional understanding of the program, to inform congressional oversight, and to provide technical expertise on proposed revisions to ethics laws. Notably, OGE [responded](#) to several complex inquiries from members of Congress and provided 23



consultations in response to requests for technical assistance on draft legislation and a wide variety of executive branch ethics issues. In fiscal year 2024, OGE advised the Government Accountability Office (GAO) on its inquiry into the federal Financial Disclosure program. During the fiscal year, OGE also tracked 179 bills of relevance to the executive branch ethics program introduced in the 118th Congress.

OGE also represented the executive branch ethics community by providing ethics expertise on 27 requests for comment on legislative materials and Executive Orders and Presidential Memoranda circulated by the Office of Management and Budget (OMB). OGE achieved a 100 percent (100%) success rate for timely responding to OMB deadlines for all of the requests OGE received.

Supported the vital work of the ethics enforcement communities

OGE supports the vital work of the ethics enforcement communities, including Inspectors General and the Department of Justice, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules. OGE responded to approximately 20 requests for expert consultations from Inspectors General offices, as well as participated actively as a member of the Council of Inspectors General on Integrity and Efficiency (CIGIE) in fiscal year 2024. Additional information on the training OGE provides to the enforcement communities is on page 17.

Participated actively in U.S. government anti-corruption efforts

OGE supports U.S. anti-corruption foreign policy by (1) assisting the State Department in ensuring that the U.S. meets its international anti-corruption obligations, (2) supporting U.S. participation in organizations that shape anti-corruption norms, and (3) supporting other countries' efforts to effectively manage conflicts of interest.

U.S. Office of Go... @Off... · Jan 12 ...
This week, OGE staff met with an IVLP delegation from the Middle East and North Africa to discuss transparency and accountability in government.

In fiscal year 2024, OGE assisted the State Department in ensuring that the U.S. met its anti-corruption obligations by participating in two multilateral peer reviews, pursuant to anti-corruption treaties, and reviewing approximately 50 anti-corruption reports, declarations, resolutions, and policy papers.

OGE continued to meet with foreign public and private sector groups about the executive branch ethics program to discuss how the ethics program fits into the broader context of anti-corruption, good governance, and transparency. In fiscal year 2024, OGE briefed eight foreign delegations comprising 82 individuals representing 53 countries.

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

Well-trained ethics officials help agency leaders and employees manage risks every day. Ethics officials must have the knowledge, skills, and abilities necessary to provide expert counsel, identify and resolve conflicts of interest, deliver quality training, and manage effective programs, making their ongoing professional development vital to the strength of the ethics program. OGE strengthened the expertise of officials who are integral to the executive branch ethics program by conducting virtual and in-person learning events, maintaining an extensive library of ethics resources, and educating other officials that are integral to the executive branch ethics program. In fiscal year 2024, OGE continued to provide all development opportunities for free to ethics officials, at no cost to agencies, saving government resources, increasing efficiency, and making a significant impact across the executive branch ethics program.

Held the National Government Ethics Summit (Summit)

Throughout fiscal year 2024, OGE provided a wide array of professional development offerings to help ethics officials prepare for their enhanced responsibilities and the increased workload

associated with a Presidential election, in part through its year-long Summit on Election Readiness, which included in-person and virtual training opportunities. As part of the Summit, OGE provided 42 offerings to nearly 5,000 registrants. These Summit sessions were intended to support agency ethics officials' ability to successfully manage a potential surge in financial disclosure filings related to a high volume of incoming nominees and termination reports for outgoing Presidentially appointed, Senate-confirmed (PAS) officials, provide each new agency employee with an initial ethics orientation, and educate a high volume of officials leaving government about the ethics rules that apply to seeking employment and post-government employment, among other key topics that arise as a result of the Presidential election.



Milestone: OGE met its milestone to deliver 42 election readiness-related trainings.

Prepared ethics officials at all levels to train, advise, and support their employees and further their agencies' missions

In fiscal year 2024, in addition to the National Government Ethics Summit on Election Readiness, OGE continued to offer numerous free professional development opportunities for ethics officials, including: (1) DAEO/ADAEO Orientations; (2) Accelerated Certification in Ethics (ACE); (3) Skill Builders; (4) the Annual Professional Ethics Practitioner (PEP) Certificate; and (5) Interactive Trainings.



Orientations: OGE conducted four multiday orientations for new DAEOs and ADAEOs to introduce them to their roles and responsibilities as ethics program leaders. Nearly 70 senior officials participated in these training sessions.

ACE: OGE developed ACE for new and aspiring ethics officials to be able to support all aspects of an executive branch ethics program. Over four months, the virtual program provided a comprehensive introduction to all aspects of the ethics program, including program administration and leadership, advice and counsel, financial disclosure, education, and communication. OGE saw a high level of interest in the program as demonstrated by the number of applications—52 from 31 agencies—OGE received to attend ACE. In fiscal year 2024, OGE awarded certificates to the 30 ethics officials from 28 agencies who were selected to attend ACE.

Skill Builders: OGE developed Skill Builders for ethics officials and others who support the ethics program to build their skills in a particular program area or add to their ethics competencies. In fiscal year 2024, OGE offered four Skill Builders attended by 179 participants on topics such as confidential financial disclosure and gifts from outside sources. After participating in the program, 84 percent of ethics officials said they were better able to do their job.

Milestone: OGE met its milestone to deliver Skill Builders and the Accelerated Certification in Ethics.

Annual PEP Certificate: OGE designed the annual PEP certificate for ethics officials who are performing some or all functions of an ethics program at full competency and who wish to maintain their skills and stay current with policy changes and developing practices in the ethics profession. By offering an annual certificate, OGE signals an expectation of ongoing professional development by ethics officials. Participation enables ethics officials to demonstrate their commitment to the practice of ethics. In fiscal year 2024, OGE held a variety of PEP



offerings. In fiscal year 2024, OGE issued 118 certificates to ethics officials from 31 agencies.

Performance Goal: OGE exceeded its goal of the percentage of ethics officials who, after participating in an OGE event, believe they can more effectively perform their job duties. Target: 80% | Actual: 88%

Maintain virtual library of on-demand ethics training

To ensure that ethics officials across the nation have access to OGE’s training, OGE continued to broadcast its virtual training sessions through social media platforms and made them publicly available through OGE’s website. In fiscal year 2024, training videos were collectively viewed nearly 31,000 times with an average duration of 15:58 minutes.

Created opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies



In fiscal year 2024, OGE continued to create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies. For example, OGE held 17 workshops for more than 390 ethics officials to discuss practices for implementing different aspects of their program. In fiscal year 2024, OGE also held a monthly “flash networking” series to provide ethics officials with an opportunity to build their

professional networks. OGE held 12 sessions, which were attended by approximately 204 individuals.

In fiscal year 2024, OGE launched a mentorship program for 76 ethics officials who participated as mentees and mentors. This program is in direct support of OGE’s professional development and DEIA efforts.

Improved the delivery and content of ethics education at agencies, including a focus on equity

As part of OGE’s Equity Action Plan in fiscal year 2024, OGE shared resources and held four virtual workshops with ethics officials on how to incorporate inclusivity and accessibility principles into the delivery of ethics education to their agencies’ employees. 120 ethics officials from 57 agencies participated in the workshops.

Educated other officials who are integral to the executive branch ethics program

In support of OGE’s goal of a strong, consistent ethics program, OGE provided advice and training to the various enforcement communities. In fiscal year 2024, OGE routinely assisted Inspectors General and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations. OGE also provided training to dozens of Inspectors General offices concerning how best to conduct ethics investigations involving the criminal conflicts of interest laws as well as the Standards of Conduct for Employees of the Executive Branch.

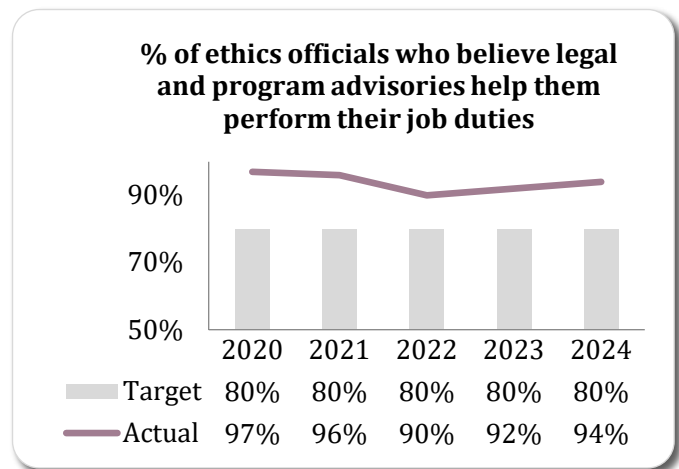


Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance

In fiscal year 2024, OGE continued to review, refine, and issue interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE’s work are described below.

Provided timely ethics guidance

In fiscal year 2024, OGE issued 13 legal advisories and 5 program advisories. The legal advisories provided guidance on emerging ethics issues, such as [accounts managed by robo-advisors](#) and [Bitcoin exchange-traded products](#). The program advisories covered topics such as listing the names of individuals granted conflict of interest waivers and the deadlines and procedures for annual public financial disclosures for the 2024 filing cycle. OGE used its listserv, website, Desk Officer services, and training broadcasts to ensure its guidance was widely disseminated. In developing advisories, OGE continued to use an evidence-based approach to determine topics, as well as to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance.



ADVISORIES

Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believe advisories helped them perform their job duties. Target: 80% | Actual: 94%

Published final ethics rules

In fiscal year 2024, OGE published a [final rule](#) to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards). The final rule updates the Standards based on OGE’s experience gained from application of the regulation since its inception, as well as based on the principles contained in Executive Order 14035 to advance equity. The final rule also incorporates past interpretive guidance, adds and updates regulatory examples, improves clarity, updates citations, and makes technical corrections.

Proposed ethics rules

In fiscal year 2024, OGE submitted to the Department of Justice and the Office of Personnel Management a proposed rule amending the regulatory exemptions at 5 CFR part 2640. The planned amendments would provide more clearly delineated exemptions with more efficient implementation and would be targeted to better address potentially conflicting financial interests.

Milestone: OGE met its milestone to publish the [final rule](#) to modernize the Standards of Ethical Conduct for Employees of the Executive Branch.

Evaluated and responded to requests from agencies to tailor their ethics programs

OGE consults with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs. In fiscal year 2024, OGE jointly issued revisions to four agency supplemental regulations and worked on supplemental regulations for a number of other agencies, including the National Transportation Safety Board, Export-Import Bank, and the Department of Veteran Affairs.



Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, *INTEGRITY*

In fiscal year 2024, OGE securely operated *INTEGRITY* at no cost to its more than 45,000 users across the executive branch, maintained and updated key financial disclosure forms, and provided key financial disclosure resources. *INTEGRITY* is a secure, web-based system that OGE provides as a quality shared service at no cost to agencies, saving government resources, increasing efficiency, and decreasing duplication and fragmentation across the executive branch. Highlights of OGE's work are described below.

Securely operated INTEGRITY, the executive branch e-filing system, for more than 90% of public financial disclosure filers

OGE worked to ensure that [*INTEGRITY*](#) continued to reliably and securely operate for the high volume of PAS nominees using the system and the thousands of current filers and reviewers who rely on the web-based system every year, at no cost. As with every year, OGE also successfully completed an independent security



review of *INTEGRITY*, which found the system to be secure. In addition, OGE continued to convene quarterly *INTEGRITY* Advisory Council meetings to provide a forum for agencies to discuss and prioritize upgrades to the system. As a result of this process, OGE made 181 enhancements, including seven that were recommendations of the *INTEGRITY* Advisory Council. For example, OGE made adjustments to the compare functionality, allowing reviewers to see changes between the previous report and the current report more easily.

Milestone: OGE met its milestone to address all independent security review findings.

Provided extensive support to users of INTEGRITY

OGE continued to provide high-quality support for users and agencies to the system's more than 45,000 users (filers, administrators, and reviewers) by providing outstanding Help Desk services, making available training resources and tutorials, and providing regular training opportunities for both new and experienced users through monthly webinars. In fiscal year 2024, OGE engaged in outreach to the user agency community by administering an annual User Support Survey, which allowed agency *INTEGRITY* administrators to provide feedback on *INTEGRITY* assistance, resources, and training.

Performance Goal: OGE exceeded its goal for the percentage of agency administrators who are satisfied with the support provided by OGE on its electronic public financial disclosure filing system. Target: 80% | Actual: 96%

Maintained and updated uniform public and confidential financial disclosure forms

OGE is responsible for maintaining uniform public and confidential ethics forms for use across the executive branch. To carry out this responsibility, OGE conducts periodic review, revision, and solicitation of stakeholder input prior to requesting renewal of an existing form or creation of a new form. In fiscal year 2024, OGE published four [Federal Register notices](#) as part of the process of renewing and updating both the public (OGE Form 278e) and confidential (OGE Form 450) financial disclosure forms, following an extensive feedback process with stakeholders that resulted in multiple changes to improve clarity, such as changing topic headings to plain language questions.

Made guidance available on confidential and public financial disclosure programs and reporting requirements

In fiscal year 2024, OGE published updated versions of the two key financial disclosure resources, the Public and Confidential Financial Disclosure Guides, which are two of OGE's most used resources. The Guides are interactive tools to assist individuals who file or review either the public financial disclosure (OGE Form 278e) or the confidential financial disclosure (OGE Form 450). OGE also continued to provide targeted training, as well as workshops for individuals with a role in the public and confidential financial disclosure systems (see page 14 for more information about OGE's Summit on Election Readiness).

Performance Goal: Ninety-three percent (93%) of ethics officials believe financial disclosure resources provided by OGE (e.g., the Public Financial Disclosure Guide, Confidential Financial Disclosure Guide, etc.) assist reviewers of financial disclosure reports. Target: 90% | Actual: 93%

Evaluated and responded to requests from agencies to use alternative financial disclosure forms

In fiscal year 2024, OGE evaluated and responded to one request from an agency to use an alternative financial disclosure form. Because of special or unique agency circumstances, the alternative procedure approval process is intended to provide an agency with the most effective tools possible for preventing and detecting conflicts of interest. For example, an agency may have separate authority to collect information under OGE-approved supplemental ethics regulations or specific statutory authority.

Strategic Goal 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program

As the supervising ethics office of the executive branch, OGE is responsible for conducting oversight to ensure that each of the more than 140 executive branch agencies has a compliant ethics program and that PAS senior leaders fulfill their initial ethical commitments. OGE's work in this area is vital, because when an ethics program fails or a senior leader fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective ethics program, OGE has developed three strategic objectives: (2.1) Monitor agency compliance with executive branch ethics program requirements; (2.2) Monitor senior leaders' compliance with individual ethics responsibilities and commitments; and (2.3) Use OGE's authorities to address known or potential ethics risks.

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

In fiscal year 2024, OGE continued to conduct reviews of agency ethics programs and to collect data about each agency's program and the overall executive branch ethics program. OGE also continued to request ethics program data from agencies to address in real time issues that require oversight. Key highlights of OGE's work are described below.

Identified agency ethics program weaknesses (non-compliance) on a 3- or 4-year risk-based program review cycle

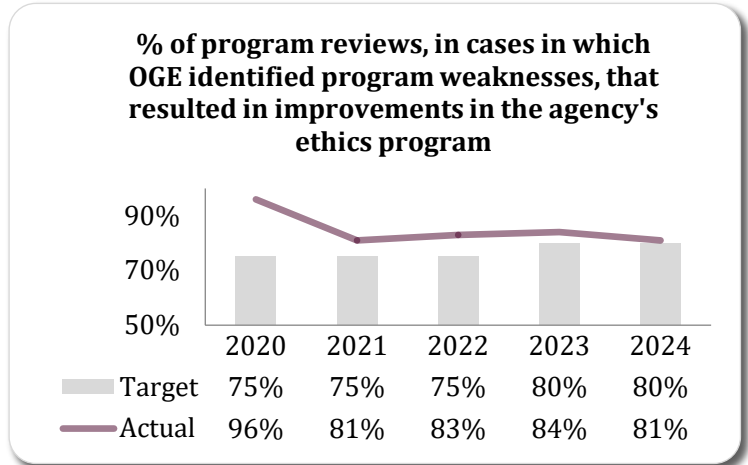
OGE conducts agency ethics [program reviews](#) as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch. OGE conducts agency ethics program reviews on a three or four-year risk-based program review cycle, with all cabinet agencies reviewed on a three-year cycle.

OGE reviews agency programs to identify and report on the strengths and weaknesses of the programs by evaluating (1) agency compliance with ethics requirements established in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. OGE examines all elements of an agency ethics program, including: program administration; financial disclosure; education and training; ethics counseling; agency-specific ethics rules on outside employment; conflict remedies; enforcement; and special government employees.

When OGE's review of an agency ethics program identifies a deficiency, the resulting report includes a corresponding recommendation directing the agency to take actions necessary to correct the deficiency. OGE then conducts a follow-up review to evaluate the

agency’s progress in implementing any recommendations made in OGE’s program review report. To enhance transparency and accountability, OGE continues to [publish](#) all program reviews and follow-up program reviews on its website.

OGE conducted 43 program reviews resulting in 70 recommendations. OGE also found 25 additional deficiencies that would have resulted in recommendations had they not been corrected prior to the completion of OGE’s review. OGE provides considerable technical assistance to agencies in correcting problems as part of its program review process, which may allow an agency to take immediate action and preclude the necessity of issuing a recommendation.



In fiscal year 2024, OGE conducted 17 follow-up reviews to assess agency compliance with 52 recommendations. OGE found agencies had taken action sufficient to justify closing 42 recommendations. OGE posts [dashboards](#) displaying the number of open program review recommendations at the end of each quarter.

PROGRAM REVIEW RECOMMENDATIONS

Target	Actual ²
3-year cycle - 31 agencies reviewed	3-year cycle - 28 agencies reviewed
4-year cycle - 11 agencies reviewed	4-year cycle - 15 agencies reviewed

Performance Goals: OGE exceeded its target to review 42 agencies by reviewing 43 agencies.

In cases in which OGE identified a program weakness during a program review, OGE met its target for the

percentage of program reviews that resulted in improvements in the agency’s ethics program. Target: 80% | Actual: 81%

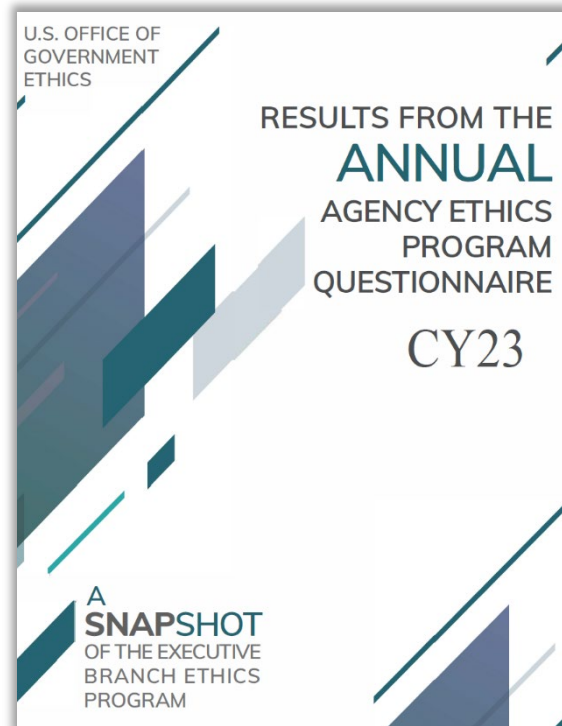
² 3-year cycle: White House Counsel, OVP, and Office of Pandemic Preparedness and Response Policy (OPPRP)(a new agency) were postponed. OGE redirected its efforts to additional 4-year cycle agencies to exceed the overall target of 42 agencies reviewed.

Collected, evaluated, published, and took action based on annual executive branch ethics program data

As part of OGE's oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects the data through its [Annual Agency Ethics Program Questionnaire](#) and uses the compliance-related data to oversee the overall executive branch program. To ensure that the program is strong, every year OGE requires agencies to self-report on key program elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency. In fiscal year 2024, OGE attained 100 percent compliance from the 142 agencies required to submit their data.

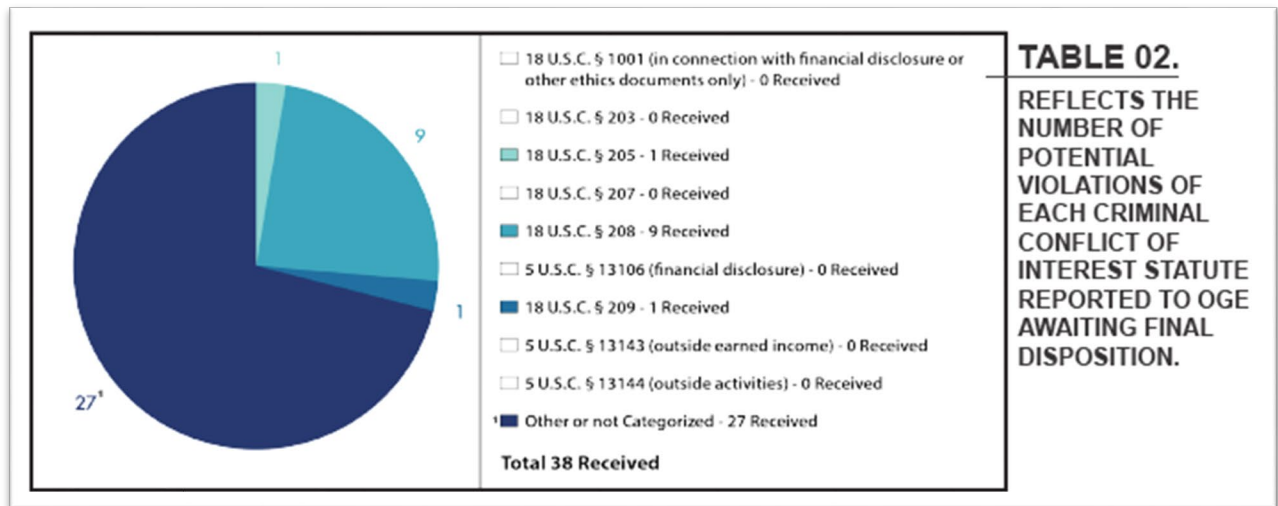
OGE thoroughly reviewed responses and followed up with agencies, as needed. OGE then continued its practice of publishing a summary report of the aggregate data and posting individual agency responses on its website to increase transparency and give the public confidence that OGE is ensuring that systems are in place at every executive branch agency to safeguard against conflicts of interest. OGE also continued to use the data to provide training on the results, and to encourage agencies to use the questionnaire, both as a self-assessment tool and to benchmark their own agency against similarly situated agencies.

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



Collected, analyzed, and published information on potential ethics violations by executive branch employees

Agencies are required to concurrently notify OGE’s Director when referring any matter to the Department of Justice involving a potential violation of a criminal conflict of interest law by an executive branch employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action if prosecution is declined. While OGE primarily works to give the public reasons to trust their government, OGE also acknowledges when officials violate that trust. For example, OGE annually publishes a [survey of ethics-related prosecutions](#), which shows the consequences for failing to abide by the ethics laws and regulations. In fiscal year 2024, OGE also continued to post [quarterly dashboards](#) displaying information regarding referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.



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

In fiscal year 2024, OGE continued to monitor agency leaders' compliance with their ethics agreements and provided a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's work are described below.

Collected and published documentation of senior agency leaders' compliance with their individual ethics commitments

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE
	b. Position Title:	to be completed by OGE
	c. Agency:	to be completed by OGE
	d. Date Ethics Agreement Signed:	to be completed by OGE
	e. Date Confirmed:	to be completed by OGE
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE

In fiscal year 2024, OGE continued its efforts to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office by monitoring compliance with the commitments in their ethics agreements. OGE continued to collect a Certification of Ethics Agreement Compliance from each appointee, which requires each appointee to personally attest that they have complied with the

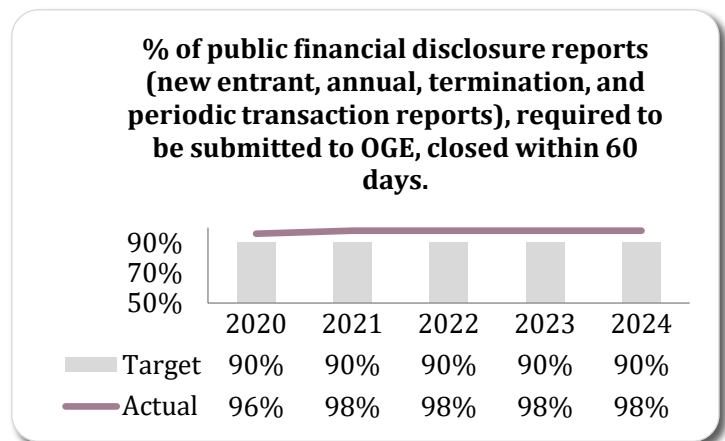
terms of their ethics agreement. In support of transparency and accountability, OGE [posts these certifications](#), as well as notices of late compliance and extensions, on its website. In the event that a PAS official is more than 30 days late in submitting their Certification or submits a Certification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

In fiscal year 2024, 134 PAS appointees were required to certify that they had complied with their ethics agreements. OGE received certifications from 134 and 133 (99%) were submitted timely.

Conducted expert second-level reviews of senior agency leaders' periodic and annual financial disclosure reports

OGE continued to collect and review the periodic transaction, annual, and termination reports of PAS filers to ensure that filers continue to comply with their ethics agreements and that agencies timely review these disclosures for conflicts of interest. In fiscal year 2024, OGE closed 2,052 reports. OGE continued to provide the public with timely access to these disclosures on its [website](#). In fiscal year 2024, OGE continued its practice of listing all financial disclosure reports available to request after 30 days on its website, regardless of certification status. OGE also continued its practice to provide each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act.

Performance Goal: OGE exceeded its target to close ninety percent (90%) of its reviews of public financial disclosure reports, including new entrant, annual, termination, and periodic transaction reports, required to be submitted to OGE within 60 days of receipt by the agency. Target: 90% | Actual: 98%



Analyzed, responded to requests for, and made publicly available Certificates of Divestiture (CDs) issued by OGE

FINANCIAL DISCLOSURE REVIEW

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain employees may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. In fiscal year 2024, OGE issued 170 CDs and timely published information about each CD it issued to the [Officials' Individual Disclosures Search Collection](#) on its website.

Consulted with agencies on waivers for their employees to the primary criminal conflict of interest law, 18 U.S.C. § 208

The primary criminal conflict of interest law, 18 U.S.C. § 208, prohibits employees from participating in certain government matters affecting their own financial interests or the interests of certain persons with whom they have ties outside the government. In some cases, a waiver to these restrictions may be appropriate if the financial interest is “not so substantial as to be deemed likely to affect the integrity of the services which the

government may expect from such officer or employee.” In fiscal year 2024, OGE consulted with agencies on approximately 200 waivers, prior to their issuance, and collected copies of final waivers. In addition, to increase transparency OGE began listing the names of all individuals who have received a waiver under 18 U.S.C. 208(b)(1) on OGE’s website (see page 36 for more information).

Implemented Legal Expense Fund Program

In fiscal year 2024, OGE established a program implementing the new legal expense fund regulation for employees who accept gifts of legal expenses arising from their official duties. The implementation of this new program included, among other things, a series of trainings for agency ethics officials, the publication of a handbook for fund trustees, as well as the publication of sample documents that may be used to establish an employee legal expense fund. OGE collected, reviewed, approved, and made available LEF trust documents on its [website](#) and quarterly reports that require second-level review.

Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks

Although limited by statute,³ OGE continued to use its authorities and oversight role to address known or potential ethics risks.

Made inquiries and potentially intervened if an agency ethics program appeared to OGE to be out of compliance with ethics requirements

OGE continued to conduct real-time inquiries and reviews in response to data or external sources that suggest that an agency ethics program is out of compliance.



³ The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rests with the management of the employing agency, the relevant inspector general’s office, or in the case of alleged crimes, the Justice Department. *See* 5 U.S.C. § 13122. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an employee’s compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE’s only recourse would be to notify the President. *See* 5 U.S.C. § 13122(f)(2)(A).

Made inquiries and potentially held the employing agency accountable for action when one of its employees appeared to OGE to be out of compliance with ethics requirements

Although OGE’s primary mission is prevention, when OGE is made aware that an employee appears to be out of compliance with ethics requirements, OGE may take one of the following steps: make inquiries to the employee’s agency ethics officials; determine whether the agency is taking sufficient remedial actions; recommend that the agency investigate or take corrective or disciplinary action; and determine whether further investigation is required. If further investigation is required, OGE may recommend that the agency refer the matter to the agency’s Inspector General. After an investigation by the agency and/or an Inspector General, OGE will consider whether any further action is required. If OGE determines the noncompliance was the result of a systemic problem with the management of the agency ethics program, OGE may evaluate the program through an unscheduled program review.

In rare cases, OGE may directly refer a case to the Inspector General for investigation when OGE is in the best position to know the facts, such as when directly involved in reviewing a nominee’s or employee’s public financial disclosure report. OGE can also use its authority to decline to certify a public financial disclosure report that comes to OGE for review. While OGE can make referrals and decline to certify reports, OGE is statutorily prohibited from making determinations that a past action constitutes a violation of a criminal ethics law.

In fiscal year 2024, OGE made 6 inquiries to an employee’s agency ethics officials. As a result of these inquiries OGE determined 2 times that the agency involved was taking sufficient remedial actions. OGE’s inquiries did not result in any recommendations that the agency investigate or take corrective or disciplinary action or that further investigation was required. In the remaining 4 inquiries, OGE found insufficient evidence of a potential violation of law. In these cases, no further action was recommended or taken.

Used transparency to hold agency leaders and ethics programs accountable

OGE uses transparency to hold agency leaders and ethics programs accountable. In fiscal year 2024, OGE published more than 2,800 individual ethics documents and agency ethics program documents. This includes oversight correspondence, program review reports, Annual Questionnaire responses, 1353 travel reports, as well as public financial disclosures, ethics agreements, related compliance documents, Pledge Waivers, and Certificates of Divestiture. Without this transparency, the public could not as meaningfully oversee the integrity of its government. See page 36 for more information.



Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership

OGE has a vital role in supporting the President’s constitutional duty to nominate and appoint officers to the executive branch. OGE helps top executive branch officials resolve conflicts and demonstrate ethical leadership to create an ethical culture in their agencies.

To achieve its strategic goal of helping top executive branch officials resolve conflicts of interest and demonstrate ethical leadership, OGE has developed three strategic objectives: (3.1) Carry out OGE’s statutory role in preparing for and supporting a Presidential transition; (3.2) Assist the President and the Senate in the Presidential appointments process; and (3.3) Foster ethical leadership in senior officials.

Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting a Presidential transition

In fiscal year 2024, OGE carried out its statutory role in preparing for and supporting a Presidential transition. Key highlights of OGE’s work are described below.

Served on the Agency Transition Directors Council

Throughout fiscal year 2024, as part of its statutory role under the Presidential Transition Act, OGE actively participated in the Agency Transition Directors Council. This Council is responsible for coordinating transition activities among the Executive Office of the President, agencies and departments, the campaigns of eligible candidates, and the transition team of the President-elect. OGE timely prepared and submitted statutorily required information for inclusion in the Transition Directory and reports to Congress. OGE also participated in events hosted by non-governmental organizations, such as the Partnership for Public Service’s Presidential Transition Service Providers’ Council.

Supported and held agency ethics officials accountable to prepare for a Presidential election, including by implementing comprehensive training plans

In fiscal year 2024, OGE provided significant support to agency ethics officials to ensure that they are prepared for their enhanced responsibilities and the increased workload associated with a Presidential election (see page 14 for more information about OGE’s Summit on Election Readiness). OGE supported agency ethics officials’ ability to successfully manage a potential surge in financial



disclosure filings related to a high volume of incoming nominees, provide each new agency employee with an initial ethics orientation, and educate a high-volume of officials leaving government about the ethics rules that apply to seeking employment and post-government employment.

To be able to effectively carry out its unique role in the Presidential appointments process following an election, OGE implemented comprehensive training plans for both ethics officials and OGE staff, which included intensive mentoring, cross-functional training, and nominee sessions throughout the fall. These plans allowed OGE staff and ethics officials to build their capacity to handle the surge in volume of nominee financial disclosure reports associated with a Presidential election, irrespective of the outcome.

Milestone: OGE met its milestone to implement the training plan for OGE staff and ethics officials.

Review disclosures and provide ethics support to Presidential candidates

In fiscal year 2024, OGE reviewed 53 public financial disclosure reports of individuals who declared their candidacy for the Office of the President or Vice President of the United States for technical completeness and posted them to OGE's website. To assist these individuals, OGE created a webpage with resources for candidates, including an overview of the process and guides for completing a financial disclosure report.



Updated key resources for campaigns, transition teams, nominee financial disclosure filers, and reviewers

OGE reviewed and updated key resources for campaigns, transition teams, nominee financial disclosure filers, and reviewers, such as those described below, which are available on [OGE's website](#).

A Road Map to Ethical Readiness for the Presidential Election and Beyond	This guide identifies ways OGE can help the Presidential Transition Team to ensure that prospective nominees have resolved their conflicts of interest so that top leadership positions can be filled quickly, explains the nominee ethics process and procedures, and provides strategies for establishing a strong ethical culture in a new Presidential administration.
Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review	OGE publishes the list of Presidentially appointed, Senate-confirmed (PAS) positions subject to its review to complement the PLUM book.
Quick Guide to PAS Reports OGE Reviews	The Quick Guide to PAS Reports OGE Reviews describes which PAS reports are or are not subject to OGE review.
Ethics Agreement Guide	The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements for PAS nominees.

<p>Nominee Ethics Guide</p>	<p>The Nominee Ethics Guide is a resource for potential Presidentially appointed, Senate-confirmed (PAS) nominees to introduce them to the nominee process and provide guidance on financial disclosure and an overview of key ethics rules and regulations. It includes sections explaining what to expect during the nominee process, how to have an ethical start to federal service, how to be a leader in ethics, and what to consider when planning to leave federal service. The appendix contains detailed reference information, such as instructions for <i>INTEGRITY</i>, and financial disclosure checklists.</p>
<p>Nominee Public Financial Disclosure Review Checklists</p>	<p>OGE developed this collection of public financial disclosure checklists for prospective incoming Presidential nominees who file public financial disclosure reports, as well as for agency reviewers.</p>
<p><i>INTEGRITY</i> User Guide and Job Aids</p>	<p>This guide is a reference manual for agency ethics officials using <i>INTEGRITY</i>, the web-based system developed by OGE for filing and reviewing executive branch public financial disclosure reports (OGE Form 278e and OGE Form 278-T).</p>

Milestones: OGE met its milestones to publish an updated Ethics Agreement Guide (Guide to Drafting Nominee Ethics Agreements), update the A Road Map to Ethical Readiness for the Presidential Election and Beyond, update the Nominee Guide, and update the Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review.

Prepared for potential Agency Review Teams

OGE has taken the steps required by the Presidential Transition Act to update its succession plan and prepare briefing materials for potential incoming Agency Review Teams. These materials include OGE’s Agency Profile, which provides an overview of the executive branch ethics program and OGE. It also includes detailed information about OGE’s leadership, structure, and components; major functional areas; and management practices.

Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process

In fiscal year 2024, OGE continued to thoroughly review the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed (PAS) nominees. OGE reviewers worked with officials at various federal agencies and the White House to resolve potential conflicts of interest through written ethics agreements. Key highlights of OGE’s work are described below.

Conducted expert second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions

In fiscal year 2024, OGE continued to work with agency ethics officials to identify and resolve any conflicts of interest that incoming PAS leaders may have. OGE identifies and resolves potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations.

OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process.

In fiscal year 2024, OGE worked with agencies and filers to identify and resolve potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. In addition, OGE worked with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act. Lastly, OGE timely transmitted each review package, consisting of the financial disclosure report and ethics agreement, directly to the Senate following a Presidential nomination.

Nominee reports range from three pages to hundreds of pages in length.

Over the years, new, more complex financial instruments have been created.

This ongoing innovation and proliferation of very complex financial instruments poses a challenge for the agency.

OGE needs to research and understand each new asset.

Staff then must determine the financial disclosure reporting requirements for these new financial instruments, analyze the potential conflicts of interest issues, and determine if any exemption would apply to the asset.

Developing remedies for potential conflicts related to more sophisticated products creates additional challenges.

Notably, the volume of reports reviewed remained high. OGE reviewed 186 reports, which represent approximately seventeen percent (17%) of all PAS positions. Further, OGE cleared 100 percent (100%) of the nominee reports it received in fiscal year 2024.

Performance Goals: OGE exceeded its target to provide initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments to agencies within established time frames. Target: 90% | Actual: 93%. OGE exceeded its target to certify final financial disclosure reports of Presidential nominees for Senate-confirmed appointments within seven calendar days of receipt from the agency. Target: 90% | Actual: 95%

Strategic Objective 3.3: Foster ethical leadership in senior officials

In fiscal year 2024, OGE continued to seek opportunities to engage senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities. Key highlights of OGE's work are described below.

Maintained regulatory standards and communicated with officials about them

Each agency head is responsible for, and must exercise personal leadership in, establishing and maintaining an effective agency ethics program and fostering an ethical culture in the agency. To that end, OGE maintains specific regulatory ethics standards for senior leaders and managers.

In fiscal year 2024, OGE continued its practice of engaging with senior leadership by delivering written welcome letters on the importance of ethical leadership to all PAS officials and sending correspondence in connection with program review reports and the financial disclosure annual season. In fiscal year 2024, OGE sent 138 year-end letters to agencies regarding compliance with financial disclosure responsibilities under the Ethics in Government Act, 65 welcome letters to new PAS officials, 62 letters to agency heads in connection with program review reports, and published [14 Leadership Notes](#).

OGE also continued to provide briefings to new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public's trust. In fiscal year 2024, OGE delivered 2 of these briefings to approximately 300 individuals. Through these engagement opportunities, OGE and agencies convey the importance of and techniques for leading ethical organizations.

Performance Indicators:

5 communications to senior officials (welcome letters, year-end letters, program review reports, Leadership Notes, SES Training)
565 senior officials received a communication



Strategic Goal 4: Use Transparency to Further the Oversight of the Executive Branch

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility by making ethics documents publicly available and raising the American public's awareness about the systems in place to prevent conflicts of interest and mechanisms available to hold their government accountable. Without this transparency, the public could not meaningfully oversee the integrity of its government.

Without transparency, the public could not meaningfully oversee the integrity of its government.

To achieve its strategic goal of using transparency to further oversight of the executive branch, OGE has developed two strategic objectives: (4.1) Make ethics information publicly available; and (4.2) Reach a broader array of stakeholders.

Strategic Objective 4.1: Make ethics information publicly available

In fiscal year 2024, OGE continued to make ethics documents publicly available. Key highlights of OGE's work are described below.

Provided timely access to ethics information and made ethics information easy to locate and understand

In fiscal year 2024, OGE continued to timely post a wide variety of ethics documents on its website to ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making. OGE makes publicly available key information about nearly all of its activities as the supervising ethics office of the executive branch. Available documents include thousands of pages of agency program review reports, policy guidance, information about each agency's ethics program, documentation of senior leaders' compliance with ethics commitments, and financial disclosure reports of high-level officials.

Notably, in fiscal year 2024, OGE processed 5,650 requests from the public and the news media to inspect more than 13,000 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, and other covered records.

In fiscal year 2024, OGE continued to take steps to increase the visibility of ethics documents that are statutorily available for request. For example, although any waivers to the conflict of interest laws issued to an employee are already available for request from that employee's agency, OGE began listing the names of all individuals who have received a waiver under 18 U.S.C. 208(b)(1) on the OGE website to effectuate transparency.

In addition, OGE worked in fiscal year 2024 to make the ethics information it provides easier to locate and understand. OGE also held a call with the press to improve the accuracy of reporting, and provided a point of contact at each agency on [OGE's ethics contact page](#) for submitting document requests.

OGE also worked to address the potential inequitable awareness of, and access to, ethics records by underserved communities. In fiscal year 2022, OGE analyzed its communications and, in fiscal year 2023, incorporated more [plain language](#) into those communications to remove barriers to access and understanding. Notably, OGE also removed a significant language barrier by translating its request form for ethics documents and its public financial disclosure form into French and Arabic.



Performance Indicator: 13,026 ethics documents requested

Milestone: OGE met its milestone to make an additional dataset available on its website.

Maintained a responsive Freedom of Information Act program

The Freedom of Information Act (FOIA) is critical in helping to ensure transparency in government by providing the public with access to important documents. OGE demonstrates its commitment to a responsive FOIA program by maintaining an effective system for responding to FOIA requests, increasing proactive disclosures, using technology to more effectively communicate with requestors, tracking requests and managing FOIA program records, improving timeliness in responding to requests, and applying a presumption of openness in responding to requests. In fiscal year 2024, OGE successfully met the Department of Justice milestones for its FOIA program, including publishing [annual reports](#) on OGE's website detailing steps taken to improve FOIA compliance and transparency. In fiscal year 2024, OGE proactively posted more than 1,100 pages of responsive records on its website.

OGE also continued to conduct regular self-assessments of its FOIA processing procedures and response templates and, when appropriate, made changes to increase efficiency, improve search processes, increase transparency, and otherwise improve the operation of OGE's FOIA program. In fiscal year 2024, OGE received 165 FOIA requests and responded to 133 requests.

Strategic Objective 4.2: Reach a broader array of stakeholders

In fiscal year 2024, OGE proactively engaged stakeholders on critical ethics issues. OGE provided relevant, understandable information through effective communication channels, such as its website; collaborated with a broad array of stakeholders; and timely responded to requests for information and assistance. Key highlights of OGE's work are described below.

Conducted proactive stakeholder engagement

In fiscal year 2024, OGE proactively engaged with a variety of stakeholders, including ethics officials, non-governmental organizations (NGOs), advocacy groups, and private citizens. Notably, OGE frequently engaged with the public as part of its regulatory review and Paperwork Reduction Act process. This included inviting feedback from stakeholders related to confidential and public financial disclosure.

Created communications that were accurate, compelling, relevant, and tailored to each target audience

To enhance public confidence in the impartiality of government decision-making, OGE worked to communicate effectively about the ethics program by creating communications that were accurate, compelling, relevant, tailored to each targeted audience, and delivered through effective communication channels. For example, using social media, including X/Twitter, YouTube, and LinkedIn, OGE consistently posted throughout fiscal year 2024 to help the public understand the structure of the ethics program, learn how to access various ethics documents, and contribute to government accountability.

In fiscal year 2024, OGE published 14 Leadership Notes to reach federal employees and the public, highlighting important issues to the community, such as [Preparing the Executive Branch Ethics Program for the 2024 Presidential Election](#), [the Ethics in Government Act Turning 45](#), and [OGE's Modernization Updates to the Standards of Ethical Conduct](#). These notes were regularly highlighted in media that reaches federal employees.

Performance Indicators: An indicator of OGE's success in expanding its outreach efforts is the number of page views of web pages targeted to the public on OGE's website (1.25M).

Responded timely to external requests for information and assistance

OGE responded to a large volume of requests for information and assistance from its external stakeholders on topics such as conflicts of interest, enforcement, public financial disclosure, gifts from outside sources, and post-employment.

In fiscal year 2024, OGE responded to approximately 75 requests for assistance from the press to support more accurate reporting about the ethics laws and regulations and OGE’s work. These interactions multiplied OGE’s ability to reach the public to promote further understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also responded to requests for assistance from other stakeholders, including more than 175 requests from private citizens. This engagement promoted understanding of the executive branch ethics program and related ethics laws and regulations.

Performance Indicator: An indicator of OGE’s success in expanding its outreach efforts is the number of requests from external stakeholders. In fiscal year 2024, OGE received approximately 300 requests from non-governmental, external stakeholders. This coverage helped the public understand the framework for government ethics in the executive branch.

Participated and collaborated with ethics practitioners across various segments of society

OGE continues to participate as a member of private sector state and local ethics organizations, such as [COGEL](#), in addition to federal interagency groups, such as the Small Agency Council. Through meetings, presentations, and online forums, OGE continues to engage and share information with NGOs, such as good governance groups, watchdog organizations, the academic community, and professional associations. OGE also conducts outreach and participates with organizations that share common interests related to OGE’s mission, such as the [Partnership for Public Service](#).



Performance Indicator: An indicator of OGE’s success is expanding its outreach/feedback activities conducted during the fiscal year. OGE conducted 20 outreach/feedback activities during the fiscal year.

Crosscutting Objective

Crosscutting Objective 5.1: Advance equity in OGE’s programs and improve diversity, equity, inclusion, and accessibility in OGE’s operations.

Advanced equity in OGE’s programs

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

OGE has published its [Equity Action Plan](#) and determined that it can most effectively advance equity and remove barriers for underserved communities in four key program areas: (1) public participation (see page 38), (2) ethics education, regulations, and interpretive guidance (see page 16), (3) ethics documents for external stakeholders (see page 36), and (4) procurement (see page 44). As described throughout this document, OGE plans to undertake, or has already implemented, a variety of actions to further equity among federal employees, the public, members of the greater executive branch ethics community, and disadvantaged businesses.

Milestone: OGE met its milestone to make progress on a majority of items in its Equity Action Plan.

Improve diversity, equity, inclusion, and accessibility (DEIA) in OGE’s operations

In fiscal year 2024, OGE continued to implement its DEIA Strategic Plan, reflecting its whole-of-agency approach to advancing DEIA. These efforts included: adding DEIA program efforts as a ratable element in SES and supervisors’ performance standards; updating its policy on rotational assignments and employee development plans (see page 41 for more information; and its 508 compliance program (see page 46 for more information).

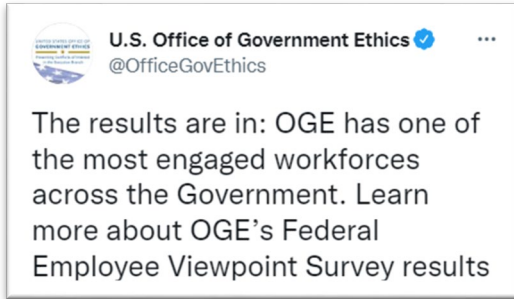
In addition, OGE offered its staff training on critical topics. OGE also surveyed staff about OGE’s DEIA efforts and utilized an Intergovernmental Personnel Act (IPA) detailee. Lastly, OGE made significant progress on its government-wide DEIA initiative related to improving access to professional development for ethics officials. See page 42 for more information.

Milestone: OGE met its milestone to make progress on a majority of items in its DEIA Strategic Plan.



Fiscal year 2024 Stewardship

To effectively lead in ethics, OGE must be an excellent steward of the resources entrusted to it to carry out its critical mission of preventing conflicts of interests in the executive branch. OGE endeavors to be a model agency with regard to its workforce,



technology, and compliance. Specifically, OGE invests in the development, diversity, and retention of its most valuable asset: its staff, who work tirelessly to accomplish the agency's vital mission. OGE leverages technology to amplify its impact by increasing the reach of its limited resources. OGE also strives to maximize every taxpayer dollar provided to the agency and to remain compliant with the wide array of requirements applicable to federal agencies.

In support of its mission and strategic goals, OGE has developed three stewardship objectives: (6.1) Sustain a high-performing, cross-functional staff; (6.2) Leverage technology to increase efficiency and effectiveness; and (6.3) Safeguard the government resources entrusted to OGE.

Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. OGE's continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities.

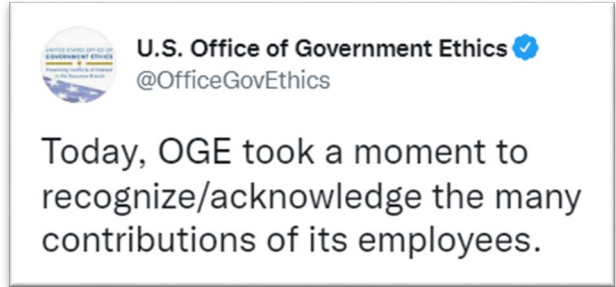
Accountability and Performance: In fiscal year 2024, OGE continued to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; reviewing the [Employee Viewpoint Survey results](#); and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

Annual Employee Survey Results

Nearly all survey items (86 out of 90) were identified as a strength (65% positive or more) and of those 34 items were 90% positive or more. No survey items (0 out of 90) were identified as a challenge (35% negative or more).

This report highlights how OGE scored on the various indices, as well as responses to each of the survey items.

Employee Recognition: In fiscal year 2024, OGE continued to recognize employees through its awards program, which includes spot awards and year-end performance bonuses. OGE surveyed its staff to identify recognition preferences and to solicit new ideas. OGE also took a wide variety of additional steps to create an inclusive work environment. For example, OGE held regular special emphasis program meetings in fiscal year 2024, which were open to OGE’s entire staff and included numerous speakers from federal and local communities.



Hiring: OGE hired and onboarded four employees, including two paid interns. Notably, OGE was able to leverage workplace flexibilities, such as remote work, to draw on a wider candidate pool, resulting in hiring individuals with prior ethics experience from across the nation.

Workforce Development: OGE continually focuses on developing the knowledge, skills, and abilities of its employees through personalized formal and informal professional development opportunities. In fiscal year 2024, all OGE employees participated in the OGE Employee Development Plan (EDP) program. Through the EDP process, employees, in collaboration with their supervisors, identify specific formal training, mentoring, self-study, and/or on-the-job training activities that they will complete in the covered period. Employees have the opportunity to lead significant projects, as well as participate in cross-functional teams and training. Notably, the EDP identifies objective measures for assessing the employee’s acquisition of the targeted knowledge or skills. Lastly, as part of its DEIA initiative, OGE issued a policy for its EDP program as part of its commitment to create more uniformity and better serve employees who are members of underserved communities. OGE implemented changes to the EDP program as part of the current performance appraisal cycle.

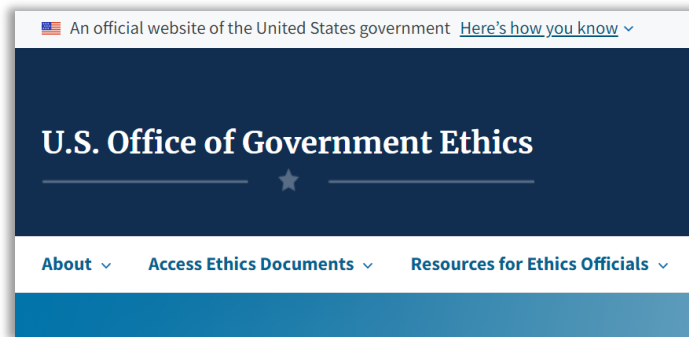
Performance Goal: OGE exceeded its target for its employee engagement index score on the Employee Viewpoint Survey. Target: 80% | Actual: 90%

Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness

OGE leverages technology to increase its efficiency and effectiveness in all aspects of its work. Without strong, secure information systems and processes, the agency cannot carry out its executive branchwide mandates, operate effectively, or efficiently perform its mission-critical activities.

Maintained and refined OGE's website

OGE's website is the agency's main communication tool and the most valuable resource for OGE's stakeholders, including agency ethics officials, the media, and the general public. OGE continued to maintain and refine its website in conformance with the 21st Century Integrated Digital Experience Act. OGE also regularly reviews its content to make sure that the hyperlinks work, and the content is accurate and up-to-date.



Maintained OGE's secure network

In fiscal year 2024, OGE moved its network to a secure, FedRAMP-certified government cloud environment, which simplifies compliance with National Institute of Standards and Technology guidelines, simplifies network disaster recovery, allowed OGE to shrink its physical office space, and provides network access independent of conditions at OGE's physical work location.

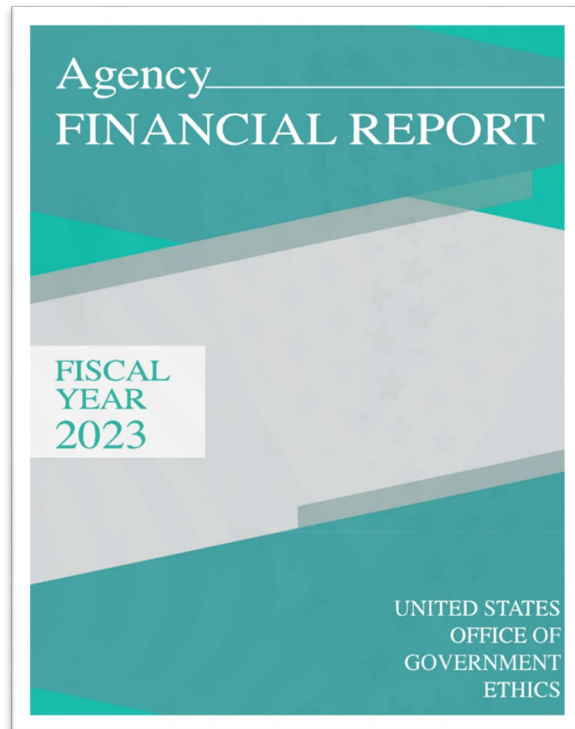
OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal year 2024, OGE continued to devote resources to applications that support major mission programs, such as the Desk Officer program, the Annual Questionnaire, the Records Program, and financial disclosure tracking, as well as those applications that support internal operations, such as requisition processing, budget formulation, and equipment tracking. These custom applications allow OGE to accomplish its mission with limited staff and help the agency to make data-driven decisions.

Milestone: OGE met its milestone to develop essential Standard Operating Procedures (SOPs)/user support resources for network operations in a cloud environment.

Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE

In addition to its mission work, OGE conducts its agency operations following the principle that “public service is a public trust.” OGE takes seriously its compliance with government-wide directives and their important policy objectives, including OGE carefully safeguarding the government resources entrusted to the agency.

Fiscal stewardship: OGE continued to be an excellent fiscal steward of the resources entrusted to it. OGE demonstrated its commitment to effectively and efficiently manage funds appropriated by Congress to execute OGE mission goals, including maximizing its use of 23 shared services and interagency agreements. Not only does OGE continually seek full value from each taxpayer dollar, it does so while implementing strong fiscal controls. Notably, in fiscal year 2024, OGE maintained an unmodified opinion on its financial statements and an independent financial audit found no material internal control weaknesses. As part of this process, OGE conducted the annual internal controls survey.



To reduce fiscal risk and ensure that OGE remains fiscally responsible, OGE continued to use a custom internal application, which builds in additional internal controls and tracking, to maintain its effective process for approving requisitions. OGE also continued to maintain strong internal controls regarding its inventory of IT equipment and other assets. Lastly, OGE updated its enterprise risk management registry to identify additional internal controls that need to be implemented across all program areas.

In addition, to use OGE’s purchasing power to increase equity among the historically underserved, OGE has refined its procurement practices, procedures, and tracking to ensure a significant percentage of its purchases (99% of contracts awarded and 26% of micro-purchases) are made from disadvantaged businesses.

Relocation of OGE office:

Notably, in fiscal year 2024, OGE was required to move to new office space for the first time in OGE’s history, which was a huge undertaking for the agency. To the benefit of the agency and overall government, OGE accomplished this by backfilling vacant space under another federal agency’s existing lease. OGE also preserved resources by significantly shrinking its office space requirements by 17,000 square feet/70% of its current space, resulting in \$1,096,000 cost savings. The significant logistics required to move impacted multiple operations across the agency and required significant work finding vacant space under another agency’s existing lease, justifying funding, digitizing all files, transitioning the previous server room, conducting business virtually without disruption to mission delivery, as well as new cloud services, equipment, and furniture.



Performance Goal: OGE met its performance goal of receiving an unqualified opinion on its annual financial report from an independent auditor.

Cybersecurity: In accordance with the Federal Information Security Modernization Act (FISMA), OGE’s security program continued to review weekly network perimeter scans performed by the Department of Homeland Security; procure and undergo annual security assessment reviews conducted by accredited independent auditors using FISMA CIO and FISMA IG metrics; provide mandatory annual cybersecurity awareness training (general and role-based); and prepare for *INTEGRITY’s* annual security assessment. OGE participates in the Continuous Diagnostics & Mitigation (CDM) Program, which provides capabilities and tools to identify cybersecurity risks on an ongoing basis, prioritizes risks based on potential impacts, and enables cybersecurity personnel to mitigate the most significant problems first. In fiscal year 2024, OGE also took steps to comply with Executive Order 14028 on Improving the Nation’s Cybersecurity and subsequent guidance (e.g., OMB Memos M-21-30, M-21-31, M-22-01, M-22-05, M-22-09, etc.). This work is critical to protect the confidentiality, integrity, and availability of OGE’s information and information systems against unauthorized access and use.

Performance Goal: OGE met its performance goal of “managing risk” for the majority of categories on the Cybersecurity Risk Management Assessment.

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

Accessibility (508 Compliance): In fiscal year 2024, OGE continued to work to ensure the agency's compliance with Section 508 of the Rehabilitation Act of 1973, which applies to all federal agencies when they develop, procure, maintain, or use electronic and information technology. Under Section 508, agencies must give disabled employees and members of the public access to information comparable to the access available to others. In fiscal year 2024, OGE designated a Section 508 Program Manager and a Section 508 Coordinator to manage a revitalized Section 508 Program. OGE implemented a new Section 508 Policy that requires awareness training for all employees and contractors, as well as specialized role-based training for Contracting Officer's Representatives, Government Purchase Card holders, and OGE employees and contractors responsible for creating and managing digital documents. OGE also established a feedback mechanism for reporting accessibility issues encountered while using its digital platforms.

Data: OGE continued to ensure the agency's compliance with the Foundations for Evidence-Based Policymaking Act, to convene monthly meetings of its Data Governance Board, and to actively participate in the Chief Data Officers Council.

Privacy: In fiscal year 2024, OGE continued to safeguard privacy by maintaining critical executive branchwide systems of records related to the ethics program, including *INTEGRITY*, as well as the agency's internal records. OGE's privacy program worked to ensure that the agency complies with the requirements of the Privacy Act, the E-Government Act, and the executive branch privacy program requirements, as established by OMB. During fiscal year 2024, OGE reviewed 11 Privacy Threshold Analyses, revised one System of Records Notice (SORN) with executive branch-wide impact, and drafted or revised ten new Privacy Impact Analyses. OGE also conducted privacy training and role-based privacy training to those required to receive it, including agency employees and supervisors, and government contractors who perform services for the agency.

Records: OGE continued to enhance its Records Management Program, in order to ensure agency records are available to the public and OGE staff, and to comply with records management requirements. In fiscal year 2024, this work included: developing and updating records management policies and procedures; digitizing all remaining paper records; developing and conducting training, and onboarding new employees; working with the National Archives and Records Administration (NARA) on OGE mission-specific disposition authorities; issuing records management guidance; conducting inventories of agency records systems and repositories; updating records file plans; and providing records management training to all employees. Notably, OGE timely submitted three program

assessments to NARA and received high scores on each report. As a result of these reviews, NARA assessed OGE's records program in the "low risk category."

Performance Goal: OGE met its goal for the number of employees that completed required training (i.e., records management, cybersecurity, privacy, and ethics training). Target: 90% | Actual: 99%