

U. S. OFFICE OF GOVERNMENT ETHICS



Fiscal Year 2003 Explanatory Notes

**Prepared for the
Committee on Appropriations**

February 2002



United States
Office of Government Ethics

1201 New York Avenue, N.W., Suite 500
Washington, DC 20005-3917

February 4, 2002

The Honorable Robert C. Byrd
Chairman
Committee on Appropriations
United States Senate
The Capitol, Room S-128
Washington, DC 20510-6025

The Honorable C.W. Bill Young
Chairman
Committee on Appropriations
United States House of Representatives
The Capitol, Room H-218
Washington, DC 20515-6015

Dear Mr. Chairmen:

With this letter I am pleased to transmit to you the Explanatory Notes of the Office of Government Ethics (OGE). The Explanatory Notes reflect funding for \$11,071,000, and 82 full-time equivalents, as set forth in the President's FY 2003 budget.

Our request represents a \$954,000 increase over the FY 2002 appropriation and includes \$350,000 to provide full funding for Civil Service Retirement System retirement benefits, and \$233,000 for health insurance costs for retirees, consistent with proposed legislation that would transfer these costs to individual agencies. An additional \$371,000 is requested for increases in rent, pay raises, and a new cross-servicing agreement for accounting services

We will be pleased to discuss our request with representatives from your office, and we look forward to our annual hearing on OGE's plans and budget. If you need additional information with regard to this request please contact Daniel D. Dunning, Deputy Director, Office of Administration and Information Resources Management, at 202-208-8000.

Sincerely,

A handwritten signature in cursive script that reads "Amy L. Comstock".

Amy L. Comstock
Director

The Honorable Robert C. Byrd
The Honorable C.W. Bill Young

cc: (w/Encl.): The Honorable F. James Sensenbrenner, Jr.
Chairman
Committee on the Judiciary
United States House of Representatives
2138 Rayburn House Office Building
Washington, DC 20515-6216

The Honorable Dan Burton
Chairman
Committee on Government Reform
United States House of Representatives
2157 Rayburn House Office Building
Washington, DC 20515-6143

The Honorable Joseph I. Lieberman
Chairman
Committee on Governmental Affairs
United States Senate
340 Dirksen Senate Building
Washington, DC 20510-6250

OFFICE OF GOVERNMENT ETHICS
RESOURCES BY UNIT
(dollars in thousands)

OFFICE	2001		2002		2003	
	FTE	AMOUNT	FTE	AMOUNT	FTE	AMOUNT
DIRECTOR	4	\$826	3	\$549	3	\$585
GENERAL COUNSEL AND LEGAL POLICY	20	\$2,650	21	\$2,704	21	\$2,776
ADMINISTRATION	13	\$1,920	16	\$1,969	16	\$2,000
AGENCY PROGRAMS	38	\$4,331	37	\$4,845	37	\$5,040
GOVERNMENT RELATIONS & SPECIAL PROJECTS	1	\$186	5	\$640	5	\$670
Direct Obligations		\$9,914		\$10,707		\$11,071
Reimbursable Obligations		\$52		\$150		\$160
Less full funding Federal Employee Retirement Costs		(\$598)		(\$590)		(\$583)
TOTAL	76	\$9,368	82	\$10,267	82	\$10,648

Estimates for accrual payment increases for full funding of Federal retirement benefits are \$598,000 for FY 2001, \$590,000 for FY 2002, and \$583,000 for FY 2003, and for comparative purposes have been allocated to the individual offices.

OFFICE OF GOVERNMENT ETHICS

OBJECT CLASSIFICATION

(in thousands)

Direct Obligations	2001 <u>Obligated</u>	2002 <u>Appropriated</u>	2003 <u>Requested</u>	Increase <u>from 02</u>
11.1 Full-time Permanent	\$5,420	\$6,327	\$6,567	\$240
11.3 Other than full time permanent	\$183	\$60	\$65	\$5
11.5 Other personnel compensation	\$254	\$190	\$190	\$0
11.9 Total personnel compensation	\$5,857	\$6,577	\$6,822	\$245
12.1 Civilian personnel benefits	\$1,791	\$2,050	\$2,043	(\$7)
21.0 Travel & Transportation/persons	\$212	\$168	\$168	\$0
22.0 Transportation of things	\$2	\$5	\$5	\$0
23.1 Rental payments to GSA	\$1,053	\$1,290	\$1,340	\$50
23.3 Communications, utilities, misc	\$85	\$81	\$81	\$0
24.0 Printing and Reproduction	\$105	\$75	\$75	\$0
25.2 Other Services	\$500	\$127	\$203	*** \$76
25.3 Purchase goods/svc from Gov't	\$64	\$80	\$80	\$0
25.7 Operation & Maint of Equip	\$3	\$12	\$12	\$0
26.0 Supplies and materials	\$129	\$105	\$105	\$0
31.0 Equipment/Land & Structures	\$113	\$137	\$137	\$0
99.0 Subtotal, direct obligations	\$9,914	\$10,707	\$11,071	\$364
99.0 Reimbursable obligations	<u>\$52</u>	<u>\$150</u>	<u>\$160</u>	<u>\$10</u>
Subtotal	\$9,966	\$10,857	\$11,231	\$374
Less offset for full funding of Federal employee retirement costs	<u>(\$598)</u>	<u>(\$590)</u>	<u>(\$583)</u>	<u>\$7</u>
99.9 Total obligations	<u>\$9,368</u>	<u>\$10,267</u>	<u>\$10,648</u>	<u>\$381</u>

*** Includes increase for new accounting services provider.

FY 2001 and 2002 are presented on a comparable basis to include the estimates of the accrual payment increases.

Office of Government Ethics
 Schedule of Estimated Pay Costs in FY 2003 by Calendar Year 2002 and 2003
 estimated costs by pay periods

	Number of Pay Periods	Salaries 11.1 & 11.3	Benefits 12.1 ***
Pay cost in CY 2002 for FY 2003	7.4	\$1,788,360	\$408,800
Pay cost in CY 2003 for FY 2003 (Assumes a 2.6% PAY RAISE in FY 2003)	18.7	\$4,843,640	\$1,051,200
Total (rounded nearest thousand and presented in explanatory notes)	26.1	\$6,632,000	\$1,460,000
Avg cost per pay period		\$254,100	\$55,939
Avg Cost per day (rounded)		\$25,410	\$5,594

*** Excludes fixed costs of \$583,000 for full accruing of costs for retirement and health benefits if proposed legislation is passed

OFFICE OF GOVERNMENT ETHICS

Fiscal Year 2001 Accomplishments

Under the leadership of the Office of the Director, OGE has achieved several major accomplishments during Fiscal Year 2001, as outlined in further detail below by various office responsibility. Major projects included the restructuring of the line offices of the agency to more effectively manage office operations; research and submission of a study as mandated by the Presidential Transition Act of 2000 to streamline the Presidential Appointee process; the submission to Congress of the Ethics in Government Act Amendments of 2001 outlining major changes to the Public Financial Disclosure reporting process; and conducting meetings with the Designated Agency Ethics Officials to more accurately assess the needs of the executive branch ethics community.

Office of Government Relations and Special Projects

- Coordinated OGE's last minute pre-election assistance to Presidential candidates and post-election assistance to the White House and President-elect in planning and carrying out a transition of administrations
 - Supported OGE's Congressional relations requirements including drafting testimony and responding to Congressional requests
 - Continued to coordinate OGE's response to requests for review by OMB of legislative proposals and testimony
 - Coordinated the staff work of OGE on the report required by the Presidential Transition Act of 2000 and developed the follow-up legislative package
 - Coordinated and/or provided OGE's response to U.S. foreign policy agencies' and entities' requests for technical assistance in anti-corruption programs abroad
 - Coordinated the agency's response to information gained from the Government-wide employee survey of the ethics program
-
- Coordinated and drafted the Annual Performance Report and any refinements to the Strategic Plan as necessary pursuant to the Government Performance and Results Act (GPRA)
 - Supported and coordinated the Director's program of outreach to the public, private sector organizations, and to other Governments

- Supported and coordinated the Director's participation on the Presidents Council for Integrity and Efficiency (PCIE) and the Executive Council for Integrity and Efficiency (ECIE)

Office of General Counsel and Legal Policy

- Assisted agencies in providing post-employment counseling to those leaving the Government at the end of an Administration
- Processed a large increase in Presidential appointee public financial disclosure reports required for Senate confirmation
- Provided informational assistance to Presidential candidates' transition planning teams
- Supported the Office of the Director's Congressional relations requirements including drafting testimony, responding to Congressional requests, and reviewing legislative proposals and testimony
- Assisted the Office of the Director in preparing reports to Congress
- Met the expected increase in requests for Certificates of Divestiture, as well as for services in support of the blind trust program
- Provided oral and written guidance and interpretations of the executive branch standards of ethical conduct
- Issued oral and written interpretive opinions on sections 202 through 209 of Title 18 U.S.C., and on other statutory provisions related to conflicts of interest and ethics
- Provided legal services for OGE as an agency
- Functioned as the liaison with the Office of Legal Counsel and the Criminal and Civil Division of the Department of Justice (DOJ) in coordinating advice, regulations and referrals
- Assisted the Office of Agency Programs (OAP) in reviewing and developing ethics training materials, including computer based training, and pamphlets, and providing legal review of materials used in training

- Developed and offered with the assistance of the OAP, specialized seminars on more advanced subjects, targeted for ethics officials who provide legal advice
- Supported OGE speaking/training and outreach programs by providing speakers and presenters
- Provided support to the Education and Program Services Division (EPSD), including working with desk officers to address complex questions concerning conflicts of interest and ethics statutes and regulations
- Provided support to the Program Review Division (PRD) by developing appropriate areas of inquiry prior to an agency's review, assisting with the review and the advice to be provided to that agency and advising on appropriate areas of inquiry for single issue audits
- Supported OGE's public information requirements including answering press inquiries
- Supported the OGE Records Management System by maintaining the majority of OGE's substantive program records
- Handled administrative responsibilities, including reports and requests under FOIA and the Privacy Act, forms clearance and liaison with OMB, GSA and Federal Register
- Assisted in developing recommendations to the White House, OMB and the DOJ for proposed amendments, to the financial disclosure programs required by the Presidential Transition Act Study
- Supported the Director's activities in her role as a member of the PCIE

Office of Agency Programs

- Monitored the ethics agreements of approximately 250 ~~Presidential appointees of the new administration~~ concerning their financial interests and ensure that such agreements are completed within 90 days of confirmation
- Tracked, collected, reviewed and certified approximately 1,000 annual and termination financial disclosure statements of Presidential appointees confirmed by the Senate

- Assisted in the review and certification of financial disclosure statements of Presidential nominees confirmed by the Senate
 - Released over 2500 financial disclosure statements to the news media and the public
 - Tracked, collected and made available to the public, the semiannual reports from executive branch departments and agencies of travel payments accepted under 31 U.S.C. § 1353 from non-Government sources
 - Conducted ethics program evaluations in 55 Federal agencies, regional offices, and military bases, focusing on OGE's legal, educational and program assistance resources in assisting the agencies in the development of better ethics systems and the resolution of outstanding ethics issues
 - Conducted six-month follow-up reviews in all agencies in which recommendations were made to improve the ethics program during the initial program review
 - Responded to agency requests for administrative waivers, exemptions and extensions relating to the public financial disclosure system
 - Maintained a desk officer system to monitor and assist all executive branch agency ethics staffs on a daily basis
 - Responded to telephone requests from agency ethics officials for assistance on all types of ethics issues
 - Developed and conducted ethics training workshops for ethics practitioners, trainers, counselors, disclosure reviewers and enforcement officials in Washington, DC and Federal Regions
 - Continued developing multimedia and computer-based training modules for use by all executive branch departments and agencies in meeting the annual ethics training requirement, especially for employees in remote locations
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- Produced, updated, and maintained the Ethics CD-ROM
 - Provided primary support and maintenance for the contents and architecture of the OGE Web site

- Continued to modify, design, and test courses developed based on the results of the annual needs analysis
- Initiated a new needs analysis to identify the changing ethics training needs of the ethics community in meeting their ethics program goals, with reduced resources
- Planned, organized, supported, and hosted the Eleventh Annual National Government Ethics Conference for approximately 450 ethics practitioners
- Developed, edited, and published the Government Ethics Newsgram
- Received, reviewed, and analyzed the Annual Agency Ethics Program Questionnaire required by the Ethics in Government Act of 1978, as amended
- Continued to design and produce easy-to-use reference materials for ethics counselors
- Assisted agencies in conducting annual ethics training when their good faith efforts to complete the requirement have been unsuccessful with special emphasis on the micro agencies
- Continued surveys to assess customer satisfaction with OGE services and products
- Planned an ethics training videotape to be used by all executive branch agencies in meeting the annual training requirement
- Supported the Director's program of Outreach to the public, private sector organizations, and other governments

Office of Administration and Information Resources Management

- Provided intra-agency support to all OGE program offices in the areas of payroll/personnel, finance and budget, small purchasing and contracting, personnel security, printing and mail services
- Produced in-house desktop published ethics training and conference materials, brochures, flyers, pamphlets, posters, the OGE Newsgram, and ethics and administrative forms

- Provided technical assistance to the EPSD in developing and publishing semi-annual updates to the "Ethics CD-ROM"
- Developed a standalone personal computer software program that will allow executive branch employees to complete and print their SF 278, Public Financial Disclosure Form, and with the program's sophisticated built in edits, significantly reduces the disclosure form review time normally required by agency ethics officials
- Continued planning and evaluating the development of government-wide database applications to be used by departments and agencies to electronically transmit ethics related information to OGE
- In collaboration with EPSD staff, continued developing enhancements and additional information services on OGE's Internet World Wide Web Page, including the ability to provide on-line registration for OGE sponsored ethics training workshops and conferences
- Provided enhancements to the newly developed software used by executive departments and agencies to complete and print copies of the SF 278 and OGE 450 financial disclosure forms
- Provided telephone support to executive agencies and employees using the OGE developed and distributed financial disclosure software
- Continued developing additional electronic ethics forms for use by departments and agencies
- Continued providing ad-hoc new and upgraded software applications training to OGE staff
- Continued providing technical assistance to EPSD in the development and deployment of interactive ethics training computer programs on The Ethics CD-ROM and OGE Web site
- Completed implementation of newly designed Document Tracking System for managing OGE's correspondence.
- Purchased the hardware and software for the development of an OGE extranet that will facilitate the secure electronic exchange of ethics information between OGE and agency ethics officials

- Continued our evaluation and planning for the conversion of paper based ethics related transactions into electronic based transactions as directed by the Government Paperwork Elimination Act (GPEA)
- Developed a Statement of Work(SOW) to obtain, through the General Services Administration (GSA) Safeguard Program, contract services for documenting and developing OGE's Information Technology Security Plan (ITSP), and implementing the associated IT security program
- Developed a Statement of Work (SOW) to obtain, through GSA, contract services to: 1) conduct and report on a business process analysis of OGE's management of the public financial disclosure reporting process for PAS positions and DAEOs, as described above, to include a cost estimate analysis to the Government of the current process ; 2) develop alternatives to OGE's current method for managing this process, with at least one alternative to be the use of a Public Key Infrastructure (PKI) and another to be a PIN/Password system; 3) conduct and provide written cost/benefit and risk assessments for each alternative; 4) and, after an alternative is selected by OGE, provide a technical requirements document for the development of a selected system
- Provided capability for all OGE employees to remotely access their OGE e-mail system via the Internet
- Developed and implemented a Web-based OGE Bulletin Board Forum for ethics officials to discuss various ethics issues on-line
- Completed an inter-agency project with the National Archives and Records Administration (NARA) and other department and agency ethics officials on the development of government-wide guidance on the management of common ethics records
- Upgraded and reconfigured OGE's Network infrastructure, including the replacement and upgrade of associated hardware and software and operating systems
- Upgraded the operating system, word processing and e-mail software on all PC workstations
- Purchased, configured, tested and implemented the necessary hardware and software that provides the ability to transmit video over the OGE network, using various

video sources, including video files, a video camera, a VCR, cable TV connection, or DVD

- Assisted OGE staff in changing from various National Finance Center workstation applications to web-based transaction processing applications

OFFICE OF GOVERNMENT ETHICS

Fiscal Year 2002 Request Level

The Director, with the assistance of two immediate staff persons, is responsible for overseeing and directing the functions of the four offices below and provides support to the Deputy Directors to implement their various initiatives.

Office of Government Relations and Special Projects

- Provide OGE's Congressional Relations requirements including drafting testimony and responding to Congressional requests, pursuing reauthorization and passage of the public financial disclosure amendments
- Coordinate and provide OGE's response to requests from OMB for review of draft bills, legislation, and testimony
- Coordinate and provide OGE's technical assistance and special international program oversight in support of U.S. efforts at encouraging anti-corruption measures throughout the world
- Support and coordinate the Director's participation on the PCIE/ECIE
- Coordinate the staff work of OGE on any special projects on analysis required by the Director, the Administration, or Congress
- Coordinate any continuing follow-up with Congressional confirming committees and executive branch agencies based upon OGE's April 2001 report on streamlining the financial disclosure process for Presidential appointees
- Coordinate the drafting of the Annual Performance Plan and subsequent report and any refinements to the Strategic Plan pursuant to GPRA and GPEA
- Adjudicate, if necessary, individual corrective actions required to be addressed by OGE including the arranging for a hearings officer, a court reporter, and a public venue, presenting the evidence against the individual in any public hearing and recommending to the Director any action that should be taken

Office of General Counsel and Legal Policy

- Review and certify for the Senate, the large number of public financial disclosure statements filed by Presidential nominees in the first year of a new Administration
- Provide ethics training through OPM, and the White House if requested, to incoming Presidential appointees, new Schedule C's and noncareer SES
- Issue proposed regulations implementing 18 U.S.C. § 207
- Undertake a study of, and make proposed recommendations for, revisions to the criminal conflict of interest statutes in Title 18
- Issue proposed regulations implementing OGE's gift acceptance authority
- Issue proposed regulations interpreting 18 U.S.C. § 209
- Issue proposed regulations implementing provisions of the Privacy Act, 5 U.S.C. app.
- Issue final regulations designating agency components under 18 U.S.C. § 207
- Issue proposed regulations implementing changes to the Ethics in Government Act
- Develop any required regulations implementing any statutory changes to conflicts of interest, ethics or financial disclosure statutes
- Support the Office of the Director's Congressional relations requirements include drafting testimony, responding to Congressional requests, and reviewing legislative proposals and testimony
- Assist the Office of Director in preparing reports to Congress
- Respond to requests for Certificates of Divestiture, and provide services in support of the blind trust program
- Provide oral and written guidance and interpretations of the executive branch standards of ethical conduct

- Issue oral and written interpretive opinions on sections 202 through 209 of Title 18 U.S.C., and on other statutory provisions related to conflicts of interest and ethics
- Provide legal services for OGE as an agency
- Work as liaison with the DOJ on litigation in which OGE is a party
- Function as the liaison with the Office of Legal Counsel and the Criminal and Civil Division of the DOJ coordinating advice, regulations and referrals
- Assist the OAP in reviewing and developing ethics training materials, including video scripts, computer based-training, and pamphlets, and providing legal review of materials used in training
- Develop and offer, with the assistance of the OAP, specialized single statute or issue seminars targeted for ethics officials who provide legal advice
- Support OGE speaking/training and outreach programs by providing speakers and presenters
- Provide support to the EPSD, including working with desk officers to address complex questions concerning conflicts of interest and ethics statutes and regulations
- Provide support to the PRD by developing appropriate areas of inquiry prior to an agency's review, assisting with the review and the advice to be provided to that agency and advising on appropriate areas of inquiry for single issue audits
- Support OGE's public information requirements including answering press inquiries
- Support the OGE Records Management System by maintaining the majority of OGE's substantive program records
- Handle administrative responsibilities, including reports and requests under FOIA and the Privacy Act, liaison with OMB, GSA and Federal Register
- Conduct any special analysis required by Congress or the Administration

- Advise the Director, when necessary, on individual corrective actions required to be addressed by OGE, including assisting the Director with any recommendations to the head of an agency or the President
- Support the Director's activities in her role as a member of the PCIE

Office of Agency Programs

- Monitor the ethics agreements of approximately 200 Presidential appointees of the new administration concerning their financial interests and ensure that such agreements are completed within 90 days of confirmation
- Track, collect, review and certify approximately 1,000 annual and termination financial disclosure statements of presidential appointees confirmed by the Senate
- Assist the OGC&LP in the review and certification of financial disclosure statements of presidential nominees prior to their Senate confirmation hearings
- Release over 1500 financial disclosure statements to the news media and the public
- Track, collect, analyze and make available to the public, the semiannual reports from executive branch departments and agencies of travel payments accepted under 31 U.S.C, § 1353 from non-Government sources
- Conduct ethics program evaluations in 50 Federal agencies, regional offices, and military bases, focusing on OGE's legal, educational and program assistance resources in assisting the agencies in the development of better ethics systems and the resolution of outstanding ethics issues
- Conduct six-month follow-up reviews in all agencies in which recommendations were made to improve the ethics program during the initial program review
- Perform two single-issue reviews Government-wide of major ethics issues to determine whether OGE and agency ethics policies are effectively meeting intended objectives
- Respond to agency requests for administrative waivers, exemptions and extensions relating to the public financial disclosure system
- Maintain a desk officer system to monitor and assist all executive branch agency ethics staffs on a daily basis

- Respond to telephone requests from agency ethics officials for assistance on all types of ethics issues
- Hold periodic seminars with small groups of agency ethics officials to discuss current ethics issues
- Develop and conduct ethics training workshops for ethics practitioners, trainers, counselors, disclosure reviewers and enforcement officials in Washington, DC and Federal regions
- Develop multimedia and computer-based training modules for use by all executive branch departments and agencies in meeting the annual ethics training requirement, especially for employees in remote locations
- Provide primary support and maintenance for the content and architecture of the OGE Web site
- Continue to modify, design and test courses developed based on the results of the annual needs analysis
- Initiate a new needs analysis to identify the changing ethics training needs of the ethics community in meeting their ethics program goals with reduced resources
- Plan, organize, support and host the Twelfth Annual National Government Ethics conference for approximately 450 ethics practitioners
- Develop, edit, and publish the Government Ethics Newsgram
- Review and analyze the Annual Agency Ethics Program Questionnaire required by the Ethics in Government Act of 1978, as amended
- Continue to design and produce easy-to-use reference materials for ethics counselors
- Assist agencies in conducting annual ethics training when their good faith efforts to complete the requirement have been unsuccessful with special emphasis on micro agencies
- Continue surveys to assess customer satisfaction with OGE services and products
- Support the Director's program of outreach to the public, private sector organizations and other governments

Office of Administration and Information Resources Management

- Continue to provide intra-agency support to all OGE program offices in the areas of payroll/personnel, finance and budget, small purchasing and contracting, personnel security, printing and mail services
- Continue producing in-house desktop published ethics training and conference materials, brochures, flyers, pamphlets, posters, the OGE Newsgram, and ethics and administrative forms
- Continue providing technical assistance to the EPSD in developing and publishing semi-annual updates to the "Ethics CD-ROM"
- Continue providing enhancements to the free standalone personal computer software program OGE developed that allows executive branch employees to complete and print their SF 278, Public Financial Disclosure Form, and with the program's sophisticated built in edits, significantly reduces the disclosure form review time normally required by agency ethics officials
- Continue planning and evaluating the development of government-wide database applications to be used by departments and agencies to electronically transmit ethics related information to OGE
- In collaboration with EPSD staff, continue developing enhancements and additional information services on OGE's Internet World Wide Web Page, including the ability to provide on-line registration for OGE sponsored ethics training workshops and conferences
- Continue providing enhancements to the newly developed software used by executive departments and agencies to complete and print copies of the SF 278 and OGE 450 financial disclosure forms
- Continue providing telephone support to executive agencies and employees using the OGE developed and distributed financial disclosure software
- Continue developing additional electronic ethics forms for use by departments and agencies
- Continue providing new and upgraded software applications training to each OGE staff member

OFFICE OF GOVERNMENT ETHICS

Fiscal Year 2003 Request Level

The Director, with the assistance of two immediate staff persons, is responsible for overseeing and directing the functions of the four offices below and provides support to the Deputy Directors to implement their various initiatives

Office of Government Relations and Special Projects

- Provide OGE's Congressional Relations requirements including drafting testimony and responding to Congressional requests
- Coordinate and provide OGE's response to requests from OMB for review of draft bills, legislation and testimony
- Coordinate and provide OGE's technical assistance and special international program oversight in support of the U.S. efforts at encouraging anti-corruption measures throughout the world
- Support and coordinate the Director's participation on the PCIE/ECIE
- Coordinate the staff work of OGE on any special projects or analyses required by the Director, the Administration or Congress
- Coordinate the drafting of the Annual Performance Plan and subsequent Report and any refinements to the Strategic Plan pursuant to GPRA and GPEA
- Adjudicate, if necessary, individual corrective actions required to be addressed by OGE including arranging for a hearings officer, a court reporter and a public venue, presenting the evidence against the individual in any public hearing and recommending to the Director any action that should be taken

Office of General Counsel and Legal Policy

- Review and certify for the Senate, the public financial disclosure statements filed by Presidential nominees
- Provide ethics training through OPM, and the White House if requested, to incoming Presidential appointees, new Schedule C's and noncareer SES
- Issue final regulations implementing 18 U.S.C. § 207

- Draft legislation to implement revisions to the criminal conflict of interest statutes in Title 18
- Issue proposed regulations implementing the revised provisions of the criminal conflict of interest statutes in Title 18
- Issue final regulations implementing OGE's gift acceptance authority
- Issue final regulations interpreting 18 U.S.C. § 209
- Issue final regulations implementing provisions of the Privacy Act, 5 U.S.C. app.
- Issue final regulations designating agency components under 18 U.S.C. § 207
- Develop any required regulations implementing any statutory changes to conflicts of interests, ethics or financial disclosure statutes, including regulations pertaining to the blind trust and CD programs
- Support the Office of the Director's Congressional relations requirements including drafting testimony, responding to Congressional requests, and reviewing legislative proposals and testimony
- Assist the Office of the Director in preparing reports to Congress
- Respond to requests for Certificates of Divestiture, and provide services in support of the blind trust program
- Provide oral and written guidance and interpretations of the executive branch standards of ethical conduct
- Issue oral and written interpretive opinions on sections 202 and 209 of Title 18 U.S.C., and on other statutory provisions related to conflicts of interest and ethics
- Provide legal services for OGE as an agency
- Work as liaison with the DOJ on litigation in which OGE is a party
- Function as the liaison with the Office of Legal Counsel and the Criminal and Civil Divisions of the DOJ in coordinating advice, regulations and referrals
- Assist the OAP in reviewing and developing ethics training materials, including video scripts, computer based training, and pamphlets, and providing legal review of materials used in training

- Develop and offer, with the assistance of the OAP, specialized single statute or issue seminars targeted for ethics officials who provide legal advice
- Support OGE speaking/training and outreach programs by providing speakers and presenters
- Provide support to the EPSD, including working with desk officers to address complex questions concerning conflicts of interest and ethics statutes and regulations
- Provide support to the PRD by developing appropriate areas of inquiry prior to an agency's review, assisting with the review and the advice to be provided to that agency and advising on appropriate areas of inquiry for single issue audits
- Support OGE's public information requirements including answering press inquiries
- Support the OGE Records Management System for maintaining the majority of OGE's substantive program records
- Handle administrative responsibilities, including reports and requests under FOIA and the Privacy Act, liaison with OMB, GSA and Federal Register
- Conduct any special analysis required by Congress or the Administration
- Advise the Director, when necessary, on individual corrective actions required to be addressed by OGE, including assisting the Director with any recommendations to the head of an agency or the President
- Support the Director's activities in her role as a member of the PCIE/ECIE

Office of Agency Programs

- Monitor the ethics agreements of approximately 100 Presidential appointees of the new administration concerning their financial interests and ensure that such agreements are completed within 90 days of confirmation
- Track, collect, review and certify approximately 1,000 annual and termination financial disclosure statements of presidential appointees confirmed by the Senate
- Assist the OGC&LP in the review and certification of financial disclosure statements of presidential nominees prior to their Senate confirmation hearings

- Release over 1,500 financial disclosure statements to the news media and the public
- Track, collect, analyze and make available to the public, the semiannual reports from executive branch departments and agencies of travel payments accepted under 31 U.S.C. § 1353 from non-government sources
- Conduct ethics program evaluations in 45 Federal agencies, regional offices, and military bases, focusing OGE's legal, educational and program assistance resources in assisting the agencies in the development of better ethics systems and the resolution of outstanding issues
- Conduct six-month follow-up reviews in all agencies in which recommendations were made to improve the ethics program during the initial program review
- Program two single issue reviews Government-wide of major ethics issues to determine whether OGE and agency ethics policies are effectively meeting intended objectives
- Respond to agency requests for administrative waivers, exemptions and extensions relating to the public financial disclosure system
- Maintain a desk officer system to monitor and assist all executive branch agency ethics staffs on a daily basis
- Respond to telephone requests from agency ethics officials for assistance on all types of ethics issues
- Hold periodic seminars with small groups of agency ethics officials to discuss current ethics issues
- Develop and conduct ethics training workshops for ethics practitioners, trainers, counselors, disclosure reviewers and enforcement officials in Washington, DC and Federal regions
- Develop multimedia and computer-based training modules for use by all executive branch departments and agencies in meeting the annual ethics training requirement, especially for employees in remote locations
- Provide primary support and maintenance for the content and architecture of the OGE web site
- Continue to modify, design and test courses developed based on the results of annual needs analysis
- Initiate a new needs analysis to identify the changing ethics training needs of the ethics community in meeting their program goals, with reduced resources

- Plan, organize, support and host the Twelfth Annual National Government Ethics Conference for approximately 450 ethics practitioners
- Develop, edit, and publish the Government Ethics Newsgram
- Receive, review, and analyze the Annual Agency Ethics Program Questionnaire required by the Ethics in Government Act of 1978, as amended
- Continue to design and produce easy-to-use reference materials for ethics counselors
- Assist agencies in conducting annual ethics training when their good faith efforts to complete the requirement have been unsuccessful with special emphasis on micro agencies
- Continue surveys to assess customer satisfaction with OGE services and products
- Support the Outreach program to the public, private sector organizations, and other governments

Office of Administration and Information Resources Management

- Continue to provide intra-agency support to all OGE program offices in the areas of payroll/personnel, finance and budget, small purchasing and contracting, personnel, security, printing, and mail services
- Continue producing in-house desktop published ethics training and conference materials, brochures, flyers, pamphlets, posters, the OGE Newsgram, and ethics and administrative forms
- Continue providing technical assistance to the EPSD in developing and publishing semi-annual updates to the "Ethics CD-ROM"
- Continue providing enhancements to a free standalone personal computer software program that will allow executive branch employees to complete and print their SF 278, Public Financial Disclosure Form, and with the program's sophisticated built in edits, significantly reduces the disclosure form review time normally required by agency ethics officials
- Continue planning and evaluating the development of government-wide database applications to be used by departments and agencies to electronically transmit ethics related information to OGE

- In collaboration with EPSD staff, continue developing enhancements and additional information services on OGE's Internet World Wide Web Page, including the ability to provide on-line registration for OGE sponsored ethics training workshops and conferences
- Provide enhancements to the newly developed software used by executive departments and agencies to complete and print copies of the SF 278 and OGE 450 financial disclosure forms
- Continue providing telephone support to executive agencies and employees using the OGE developed and distributed financial disclosure software
- Continue developing additional electronic ethics forms for use by departments and agencies
- Continue providing new and upgraded software applications training to each OGE staff member
- Continue providing technical assistance to EPSD in the development and deployment of interactive ethics training computer programs on The Ethics CD-ROM and OGE Web site
- Begin the testing and implementation of newly developed OGE Audit Tracking System (OATS)
- Complete pilot testing and begin full implementation of an OGE extranet that will facilitate the secure electronic exchange of ethics information between OGE and agency ethics officials
- Continue evaluating and planning the conversion of paper based ethic related transactions into electronic based transactions as directed by GPEA
- Complete implementation of the newly developed OGE Information Technology Security Plan (ITSP)
- Begin development and pilot testing of a new automated web-based Public Financial Disclosure system
- Continue providing technical support and enhancements to OGE's newly developed a Web-based OGE Bulletin Board Forum, used by ethics officials to discuss various ethics issues on-line
- Continue providing technical assistance to EPSD in the development and deployment of interactive ethics training computer programs on The Ethics CD-ROM and OGE Web site
- Begin planning and development of a revised OGE OATS

- Begin the development, configuration and testing of an OGE extranet that will facilitate the secure electronic exchange of ethics information between OGE and agency ethics officials
- Continue evaluating and planning the conversion of paper based ethics related transactions into electronic based transactions as directed by GPEA
- Using contract services under the GSA Safeguard Program, Information Resources Management Division will develop documentation and procedures for the OGE Information Technology Security Plan (ITSP) and began implementation of the associated IT Security Plan
- Using contract services issued through GSA, OGE will begin work to: 1) conduct and report on a business process analysis of OGE's management of the public financial disclosure reporting process for PAS positions and DAEOs, as described above, to include a cost estimate analysis to the Government of the current process ; 2) develop alternatives to OGE's current method for managing this process, with at least one alternative to be the use of a Public Key Infrastructure (PKI) and another to be a PIN/Password system; 3) conduct and provide written cost/benefit and risk assessments for each alternative; 4) and, after an alternative is selected by OGE, provide a technical requirements document for the development of a selected system
- Continue providing technical support and enhancements to OGE's newly developed a Web-based OGE Bulletin Board Forum, used by ethics officials to discuss various ethics issues on-line
- Continue producing in-house desktop published ethics training and conference materials, brochures, flyers, pamphlets, posters, the OGE Newsgram, and ethics and administrative forms
- Continue providing technical assistance to the EPSD in developing and publishing semi-annual updates to the "Ethics CD-ROM"
- Continue development of a free standalone personal computer software program that will allow executive branch employees to complete and print their SF 278, Public Financial Disclosure Form, and with the program's sophisticated built in edits, significantly reduces the disclosure form review time normally required by agency ethics officials

- Continue planning and evaluating the development of government-wide database applications to be used by departments and agencies to electronically transmit ethics related information to OGE
- In collaboration with EPSD staff, continue developing enhancements and additional information services on OGE's Internet World Wide Web Page, including the ability to provide on-line registration for OGE sponsored ethics training workshops and conferences
- Provide enhancements to the newly developed software used by executive departments and agencies to complete and print copies of the SF 278 and OGE 450 financial disclosure forms
- Continue providing telephone support to executive agencies and employees using the OGE developed and distributed financial disclosure software
- Continue developing additional electronic ethics forms for use by departments and agencies
- Continue providing new and upgraded software applications training to each OGE staff member
- Continue providing technical assistance to EPSD in the development and deployment of interactive ethics training computer programs on The Ethics CD-ROM and OGE Web site
- Begin the testing and implementation of newly developed OATS
- Complete pilot testing and begin full implementation of an OGE extranet that will facilitate the secure electronic exchange of ethics information between OGE and agency ethics officials
- Continue evaluating and planning the conversion of paper based ethic related transactions into electronic based transactions as directed by the GPEA
- Complete implementation of the newly developed OGE ITSP
- Begin development and pilot testing of a new automated web-based Public Financial Disclosure system
- Continue providing technical support and enhancements to OGE's newly developed a Web-based OGE Bulletin Board Forum, used by ethics officials to discuss various ethics issues on-line