U.S. OFFICE OF GOVERNMENT ETHICS

Fiscal Year 2026



CONGRESSIONAL BUDGET JUSTIFICATION, ANNUAL PERFORMANCE PLAN

> PREPARED FOR THE COMMITTEES ON APPROPRIATIONS MAY 2025

UNITED STATES OFFICE OF GOVERNMENT ETHICS

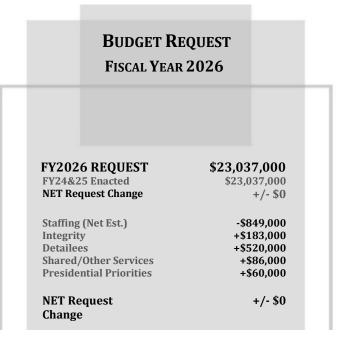
Section I - Budget Request Overview

Appropriations Language

OGE proposes the following appropriations language: "For necessary expenses to carry out functions of the Office of Government Ethics pursuant to chapter 131 of title 5, United States Code, the Ethics Reform Act of 1989, and the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act (Public Law 112–105), including services as authorized by section 3109 of title 5, United States Code, rental of conference rooms in the District of Columbia and elsewhere, hire of passenger motor vehicles, and not to exceed \$1,500 for official reception and representation expenses, \$23,037,000."

Budget Request Overview Narrative

OGE is submitting a requested funding level of \$23,037,000 for fiscal vear 2026, the minimum required to support its heavy workload (see PAS nominee chart on page 3) while simultaneously recognizing executive branch funding constraints. In fiscal year 2026, OGE must operate at peak performance in response to a highvolume of the President's priority nominations of Senate-confirmed appointees (PAS) and public demands for transparency while concurrently carrying out its other vital mission work preventing conflicts of interest and ensuring the impartiality of government decision-making across the entire executive branch. This request maintains a flat funding level equal to the prior two





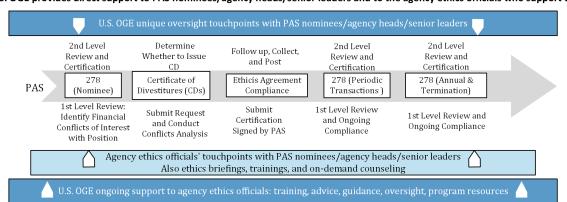
fiscal years (fiscal year 2024 and fiscal year 2025) to manage the significantly increasing workload following a Presidential transition and increasing demands to support, lead, and exercise oversight over 140+ agencies and 5,000 ethics officials that comprise the executive branchwide ethics program. Resourcing OGE's mission is vital. Without the standards for impartiality and ethical decision-making created by OGE and the ethics program, government leaders cannot effectively deliver on their promises, perform their required public duties, or serve this country and its people. To maximize the value of its requested funding and to amplify its benefits across the



executive branch, OGE will continue to leverage technology, offer shared services, seek efficiencies, mitigate risk, and use its convening power to reduce duplication and fragmentation.

OGE requires the requested funding to meet high demand for its unique role in the Presidential appointments process while overseeing the entire executive branch ethics program designed to prevent conflicts of interest

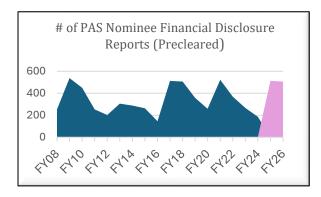
OGE is requesting \$23,037,000 for fiscal year 2026 to carry out the agency's critical role in safeguarding the public's trust in government by preventing conflicts of interest. The importance of this work cannot be overstated. Specifically, the requested funding is needed for the expert staff and systems that are essential for reviewing the nominee financial disclosure reports of the top leadership positions appointed by the President and requiring Senate confirmation. The volume of this statutorily-required work increases significantly in the two years after a presidential election. OGE's accomplishment of this valuable work depends both on its expert staff and well-functioning information systems. Specifically, OGE requires the requested funds to operate and maintain necessary upgrades to OGE's INTEGRITY system (\$3,383,000) and to fund its expert staff (\$16,954,000). Simultaneously, OGE must carry out its mission-critical work to support the thousands of agency ethics officials who are carrying out this vital PAS work in partnership with OGE while implementing their agency ethics programs in 140+ agencies. These demands further require expert OGE staff and mission-specific information technology (IT) systems and tools (\$600,000). OGE must have expert staff available to monitor senior leaders' compliance with their ethics requirements, answer complex questions, provide written guidance, train ethics officials, revise rules, and provide support to investigators and enforcement partners. All of this work is necessary to help protect executive branch agencies and officials from ethical lapses.



U.S. OGE provides direct support to PAS nominees/agency heads/senior leaders and to the agency ethics officials who support them

Requested funding is needed for expert staff and systems to support the President and Senate in the PAS appointments process

With respect to OGE's unique role in assisting the President and the Senate in the presidential appointments process, OGE's staff are the foremost experts on executive



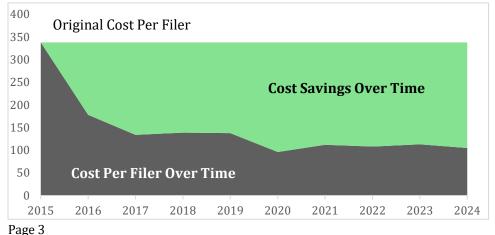
branch PAS nominee financial disclosure – a process necessary to ensure that government leaders are free from financial conflicts of interest and understand their obligations as individuals and as leaders in their agency's ethics programs. OGE's workload in fiscal year 2026 to support the President's constitutional duty to nominate PAS appointees is expected to remain very high based on the current pace and data from the previous Trump Administration (*see* PAS nominee chart).

Moreover, the complexity of the financial interests of nominees and appointees significantly adds to the work of reviewing their financial disclosure reports and helping them resolve identified conflicts of interest. It takes years to cultivate the expertise

necessary to timely support this demanding work, driven directly by the President's/White House priorities and Senate confirmation timelines. OGE requires a full complement of its highly crossfunctional staff to respond to the surges in workload and when constrained, requires budget resources and White House support to leverage expert reimbursable detailees (\$520,000) from other executive branch agencies (often former OGE staff) to accomplish this high-volume, complex work.



In addition to expert human resources, OGE requires its IT systems working at full capacity to keep pace with its heavy workload. OGE must continue to operate, maintain, and invest in *INTEGRITY*, its executive branch-wide electronic financial disclosure filing system. *INTEGRITY* has revolutionized the process of filing public financial disclosure reports for the highest-level officials in the executive branch. A secure, web-based system that consistently receives over 90% satisfaction rates, *INTEGRITY* has improved the accuracy and



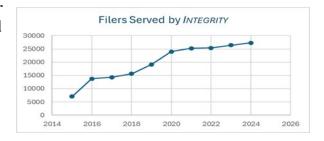
efficiency of this important but complex disclosure process. Over 26,000 filers use the system annually and benefit from improved filing accuracy resulting from wizards and

OGE Fiscal Year 2026 Budget Justification and Annual Performance Plan

seamless end-to-end electronic workflow, which prevented any disruption to the Presidential transition even during the global pandemic. OGE provides this quality shared service at no cost to all executive agencies, which is conservatively estimated to have **saved over \$50 million in government resources since** *INTEGRITY* **was launched in 2015**. Although the number of filers has increased, the cost of filing a financial disclosure report in *INTEGRITY* has dropped by more than 50% (*see* <u>chart on cost savings</u> above). This has increased efficiency and decreased duplication and fragmentation across the executive branch in this often-complex disclosure process.

In fiscal year 2026, the demands on *INTEGRITY* will continue to increase. Even without significant enhancements, constant system upgrades are necessary to keep *INTEGRITY* current, secure, and operating at peak efficiency. Continued investment in this highly successful, statutorily-mandated system is vital to the success of the Presidential appointments process and the executive branch-wide public financial disclosure program.

Funding at the requested level would cover the costs of operations and provide needed funding for contingencies, such as bug fixes, new identification authentication processes, and regular, planned system upgrades (\$183,000). Based on historical data, the demand for *INTEGRITY* will continue to grow, which in turn increases



the demand for support and the need for greater system capacity (*see* chart on filers served). In addition, the ever-increasing complexity of the financial interests of nominees and appointees significantly adds to the work of keeping the system up-to-date and ensuring new requirements improve the system.

Requested funding is needed for expert staff and systems to lead and oversee the 140+ agencies, thousands of ethics officials, and millions of employees under the executive branch ethics program

OGE's important statutory responsibilities include promulgating and maintaining enforceable standards of ethical conduct for the nearly 2.7 million employees in over 140 executive branch agencies and the White House; overseeing a financial disclosure system



general public.

for more than 26,000 public and 390,000 confidential financial disclosure report filers; conducting oversight of more than 140 agency ethics programs for compliance with applicable ethics laws and regulations; providing education and training to the more than 5,000 ethics officials; and making ethics documents available to the In fiscal year 2026, OGE will need the full complement of its requested resources to support these responsibilities, recognizing that tradeoffs and shifts in mission priorities will still be necessary. Specifically, OGE requires funding for expert staff to carry out its statutory role in the Presidential appointments process, provide advice to and meet the training needs of thousands of agency ethics officials, oversee and ensure that more than 140 agencies have compliant ethics programs, develop and launch public-friendly government ethics content, maintain its website, and release thousands of ethics documents to the How does the Ethics Program Prevent Conflict of Interests?



public. Given resource constraints, OGE will also use its requested resources to leverage technology to become more efficient. These efficiency initiatives include taking full advantage of its existing software toolkit and its Artificial Intelligence (AI) components to streamline FOIA processing, modernize and simplify records management, and improve its information management systems. OGE will use its funding to enhance and support mission-supporting applications such as its Agency Information Management System, Financial Disclosure Tracking System, Ethics Agreement Tracking System, Program Review and Oversight Management application, and mentorship application. As always, OGE will continue to be a strong fiscal steward of taxpayer dollars, as evidenced by its history of taking full advantage of the efficiencies and cost savings associated with the use of shared services, space consolidation, and streamlined operations. OGE will continue to explore agency reforms with the goal of reducing burden, increasing efficiency, and improving operations.

OGE also must be fully resourced to comply with and advance the Administration's other key initiatives and mandates

OGE is subject to and in compliance with the more than 100 Presidential and related issuances for agencies in the executive branch and must be resourced to carry out the President's priorities.

Workforce and Efficiency Directives

Return to Office: In 2024, OGE was required to relocate to a new office space for the first time in more than 20 years. To the financial benefit of the government, OGE accomplished this by backfilling unutilized, vacant space under another federal agency's existing lease and by shrinking its office space requirements by a remarkable 70% (17,000 square feet) from its previous leased space. **OGE's efforts are resulting in government savings of over \$10 million over the course of its occupancy agreement**. In fiscal year 2026, to maximize its cost-efficient use of space in light of increased in-person work, OGE will use its requested fiscal year 2026 funds to increase Internet accessibility (\$64,000), pay commuter subsidies (\$63,000), and procure needed office supplies (\$10,000) and privacy equipment (\$20,000) to ensure the ongoing productivity of OGE employees. OGE also anticipates a significant increase in shared services costs (\$86,000) as other federal

agencies and commercial service providers adjust their costs to provide needed services.

Agency Reductions in Force and Reorganization Plans: OGE expects to be required to pay significant leave buyouts for departing employees (\$120,000) from the Deferred Resignation Program and Voluntary Early Retirement Authority. Due to the combination of ongoing significant workload demands described above, departure of expert staff, and hiring limitations, OGE intends to request Subject Matter Experts (SMEs) from other federal agencies as reimbursable details (\$520,000). OGE requires the necessary funds to reimburse the servicing agency as an off-set to normal salary and benefits expenses.

Government Efficiency Initiatives: In light of staffing and resource constraints, OGE will use a portion of its requested training funding (\$15,000) to upskill its staff and increase the agency's ability to use AI and automation technology to further increase efficiency and enhance mission delivery. In addition, to promote transparency with respect to government spending, OGE will continue using its centralized system for tracking agency spending, incorporating strong internal controls, reviewing and consolidating essential contracting actions, fully utilizing the payment integrity system to ensure only proper payments are made to service providers, and posting all contract payment justifications on OGE's website.

Scaling and Securing the FedRAMP Cloud Marketplace: OGE's budget request prioritizes investments in IT modernization and cybersecurity initiatives, with a specific emphasis on the use of reliable and secure cloud technology and the implementation of Zero Trust Architecture. Funding at the requested level of \$23,037,000 will enable OGE to continue to operate and maintain its secure FedRAMP Cloud IT infrastructure service environment in support of presidential priorities and OMB guidance, such as M-24-15, Modernizing the Federal Risk and Authorization Management Program. OGE estimates it will spend over \$600,000 on OGE network FedRAMP Cloud services and other governance, risk and compliance tools in fiscal year 2026 supporting this presidential priority.

Conclusion

OGE respectfully requests funding of \$23,037,000 for fiscal year 2026 to support OGE's expert staff and additional SMEs, operate and maintain critical IT systems including *INTEGRITY*, modernize essential systems, meet the Administration's priorities, and continue to be a responsible steward of OGE's important statutory responsibilities. Foregoing any of these necessary investments would impact the President's priority nominees/top leadership positions and put OGE's mission of preventing conflicts of interest and protecting the impartiality of government decision-making at risk. Although tiny in the scheme of the President's budget, every dollar appropriated to OGE is well used and amplified through the support it provides to more than 140 executive branch agencies. Cutting or underfunding OGE's budget would increase risk to OGE and every agency's mission across the executive branch and prevent OGE from supporting the more than 5,000 ethics officials who help to ensure that the more than 2.7 million employees carry out their duties in the public interest. It is vital to invest in OGE and a strong government ethics program.

Budget Request by Object Classification

The object classification table set forth below summarizes OGE's request (in thousands of dollars).

Table: Budget Request by Object Classification (in 000s)

<u>Obiect Class</u>	2024 <u>Enacted</u>	2025 <u>Enacted</u>	2026 <u>Request</u>
11.0 Salaries	\$12,244	\$12,397	*\$12,164
12.0 Benefits	\$4,387	\$4,886	\$4,270
21.0 Travel	\$2	\$2	\$2
22.0 Transportation (Freight)	\$2	\$4	\$3
23.1 Rental Payments to GSA	\$1,426	\$343	\$345
23.0 Comms and Utilities	\$74	\$80	\$145
24.0 Printing/Reproduction	\$17	\$40	\$27
25.0 Other Services	\$4,759	\$5,110	^\$5,934
26.0 Supplies and Materials	\$42	\$75	\$53
31.0 Equipment	\$84	\$100	\$94
99.00 Subtotal	\$23,037	\$23,037	\$23,037
99.00 Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0 Totals	\$23,762	\$23,762	\$23,762
FTEs	78	78	65

(NOTE: FY2025 actuals in MOCs 11.0, 12.0, and 25.0 are expected to change as OGE's employee count drops, vacancies remain open, leave buyouts are processed, and reimbursable SME detail positions are filled and reimbursed. SME detailees are accounted for in MOC 25.0 and not in 11.0 and 12.0.)

* FY2026 salary and benefit costs remain OGE's largest expense even with an expected reduced FTE count, in part due to significant potential buyouts, increased return to office costs, and performance pay. The FY2026 FTE estimate is the number expected at the end of FY2025.

^ The projected increase in MOC 25.0 in FY2026 is in part due to costs associated with a new *INTEGRITY* contract and new authentication services, and the expected onboarding of SME reimbursable detailees.

Mission of the United States Office of Government Ethics

The U.S. Office of Government Ethics (OGE)'s unique statutory mission is to prevent conflicts of interest and oversee the executive branch ethics program, which is designed to ensure that the more than 2 million executive branch employees carry out their government duties in the public interest. OGE, a micro agency, accomplishes its mission by providing direct support to and oversight of the over 5,000 ethics officials decentralized in the more than 140 agencies in the executive branch who directly assist employees with their ethical responsibilities. OGE provides direct support to the President in his constitutional duty to nominate and appoint officers and provides transparency to the public. Without OGE and the important ethics program it leads, 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. Read more about OGE's mission, activities, and structure in <u>OGE's Agency Profile</u>.

Fiscal Year 2025 and 2026 Priorities



Carrying out OGE's unique and important statutory role to review the nominee financial disclosure reports of the top leadership positions in Government requiring Senate confirmation. This important review directly supports the President, White House Counsel Office, White House Office of Presidential Personnel, and the Senate priorities to quickly fill these vacancies. This work includes reviewing nominee reports to identify and resolve conflicts of interest for PAS nominees through public financial disclosure and ethics agreements.



Providing advice to ethics officials and meeting the training needs of new and experienced ethics officials by delivering orientations for new ethics program leaders, offering certificate

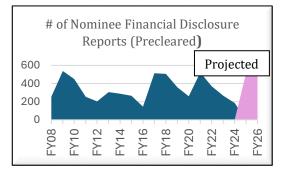
programs and seasonal trainings, and overhauling the virtual library of over 100 educational resources, with a focus on improving user experience, including a more robust search functionality.

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Overseeing and ensuring more than 140 agencies have compliant ethics programs. Integrating the annual agency ethics program questionnaire into the oversight review process and leveraging technology to create efficiencies in the program review process.



Developing and launching new public-friendly government ethics content, in addition to continuing to maintain OGE's website and releasing ethics documents (over 13,000 in fiscal year 2024).





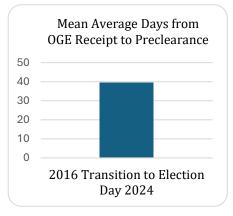
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ETHICAL LEADERS AND ETHICAL LEADERSHIP

PAS NOMINEES: OGE provides direct assistance to the President and the Senate in the Presidential appointments process. OGE provides a second-level review of the public

financial disclosure reports of individuals being considered for the highest-level positions in the executive branch, Presidentially appointed, Senate-confirmed (PAS) nominees, and makes the completed reports available to the public. Failure to perform this responsibility can result in critical senior leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk. Approximately 1,100 PAS positions are reviewed by OGE. Historically, OGE has reviewed on average 1,475 PAS reports during the four year period of a Presidential Administration. Based on past experience, OGE expects to review 65% of those in fiscal years 2025 and 2026, with an average review time of <u>40 days</u>.



What affects how long the ethics review takes? While the complexity of the report, which has trended upward in recent years, is a factor in the length of a review, the single biggest factor affecting the time it takes to review a nominee's financial disclosure report is the responsiveness of the nominee.



Performance Goals: Initial comments on draft reports of PAS nominees are provided to the agency within five calendar days of receipt/Final financial disclosure reports of PAS nominees are certified by OGE within 7 calendar days of receipt



Page 9 OGE Fiscal Year 2026 Budget Justification and Annual Performance Plan **SENIOR LEADERS**: OGE seeks opportunities, such as sending welcome letters to each new leader, to engage senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities. Failure to perform this responsibility can result in systemic or individual ethics issues that result in the public losing trust in government operations.



Other Indicators of Success:

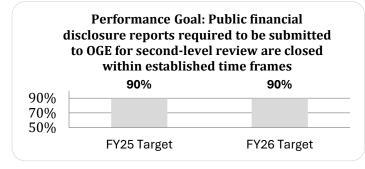
about ethics

of communications (welcome letters, year-end letters, program review reports, Leadership Notes, SES Training) sent to senior leaders about ethics# of senior leaders receiving a communication from OGE

SENIOR LEADER COMPLIANCE: OGE monitors senior leaders' compliance with their individual ethics commitments to confirm that they keep the promises they made when entering government and continue to serve impartially throughout their government service. OGE does this by collecting and reviewing Certificates of Ethics Agreement Compliance and analyzing and issuing certificates of Divestiture (CDs) for those who have to divest

to comply with the conflict of interest laws.

OGE will also support PAS nominees' (and others) ongoing commitments to disclose their interests and resolve their conflicts of interest by collecting and reviewing, approximately 1,900, periodic transaction, annual, and termination reports each year using *INTEGRITY*. Without this oversight, OGE will be unable to ensure senior leaders have timely complied with their ethics commitments and the public cannot be certain that government leaders are acting in their interest.



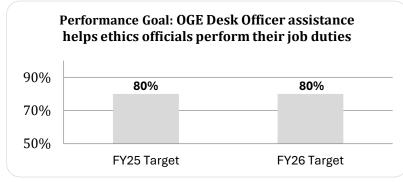




Other Indicators of Success: % of Certificates of Ethics Agreement Compliance timely submitted # of Certificates of Divestiture issued

STRONG CONSISTENT EXECUTIVE BRANCHWIDE PROGRAM

ETHICS ADVICE: OGE provides on-demand advice and program support to ethics officials at each executive branch agency through its Desk Officer Program. OGE will also build community by offering its mentorship program and holding flash network events. To facilitate information sharing, OGE will hold quarterly DAEO meetings and will convene ethics officials to learn from each other. Without competent ethics officials, the ethics program cannot succeed in implementing a consistent program that helps employees carry out their duties impartially and executive branch agencies mitigate ethics risks.

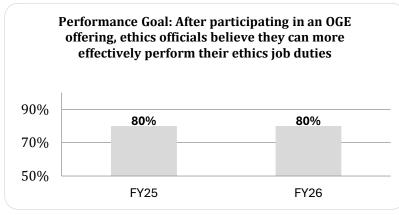


Other Indicators of Success: # of requests for assistance and rate of responsiveness # of listserv messages and % of ethics officials on the listserv

ETHICS EDUCATION: OGE provides ethics officials at all levels with an array of live and ondemand professional development offerings, including workshops, exercises, lectures, and demonstrations. OGE offerings include certificate programs for new and aspiring ethics program leaders as well as experienced ethics officials.



In addition, to increase efficiency and reduce duplication of effort, OGE plans to improve the usability of ethics education agency ethics officials can use to deliver required initial and annual ethics to their own employees. Without competent ethics officials, the ethics program cannot succeed in implementing a consistent program that helps federal employees comply with the ethics rules and mitigate risks to executive branch agencies' missions.



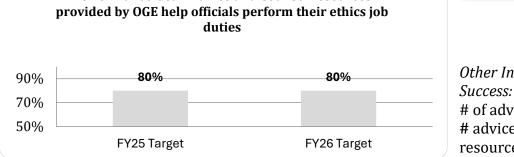
Other Indicators of Success: Delivered certificate programs # of courses offered # registrants # of on-demand offerings

of PEP certificates awarded

WRITTEN ETHICS ADVICE: OGE reviews, refines, and issues interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Without OGE's expert guidance, agency employees and their leaders are left to guess at consistent solutions to complex ethical dilemmas, and ethics programs could be fragmented and inconsistently implemented.

Performance Goal: Advice and Counsel resources



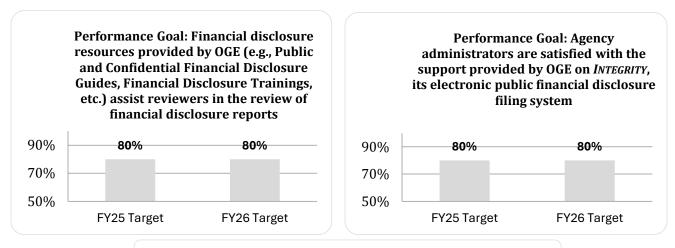


Other Indicators of Success: # of advisories issued # advice and counsel resources issued

ANNUAL FINANCIAL DISCLOSURE: OGE leads the executive branch financial disclosure program. This includes maintaining uniform requirements, key resources, and operating *INTEGRITY*, the executive branch e-filing system used by more than 90% of all public filers. Without *INTEGRITY*, the President's priority PAS nominees, and more than 26,000 of the highest senior officials, would have to revert to less efficient and less



accurate paper filing of financial disclosure reports, resulting in significant delays in review and certification, and conflicts of interest left unidentified and unaddressed.



Performance Goal: OGE addresses all security findings

Other Indicators of Success:

Less than 1% System downtime/access to INTEGRITY

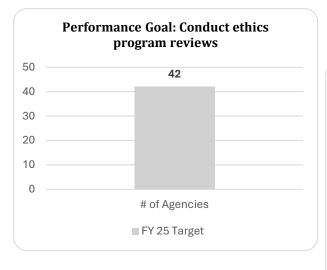
OVERSIGHT AND ACCOUNTABILITY

AGENCY COMPLIANCE: OGE regularly conducts oversight of each executive branch agency's compliance with ethics program requirements to identify and mitigate ethics program vulnerabilities. The executive branch ethics program is decentralized and relies on agencies to implement compliant programs, for which the head of each agency is responsible. OGE conducts program reviews and issues reports that include recommendations for improvement, as needed. OGE conducts follow-up reviews to evaluate agencies' progress in implementing OGE's recommendations. Without this oversight,

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Agency Ethics Documents Search Collection

agencies may not have compliant ethics programs, allowing systemic problems to multiply and result in ethics program failures. OGE is increasing the frequency of its key oversight



Performance Goal: # of recommendations closed during program reviews or as a result of follow-up inspections

60		
	40	40
40		
20		
0		
	FY25 Target	FY26 Target

function by moving all agencies onto a three-year review cycle starting in fiscal year 2026.



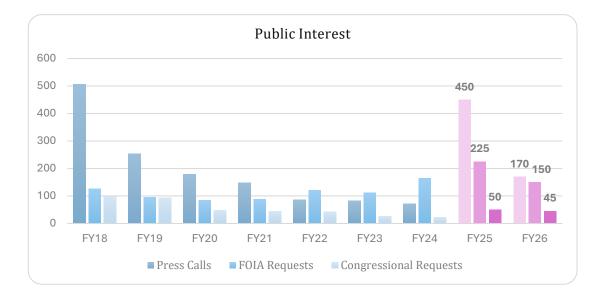
Other Indicators of Success: # of follow-up reviews conducted

TRANSPARENCY

PUBLIC PARTICIPATION: The executive branch ethics program is designed to provide transparency to the public about the systems in place to detect and resolve conflicts of interest. To carry out these requirements OGE:

- maintains its website, viewed by more than 1 million people each year;
- timely responds to ~1,000 external inquires each year;
- makes ethics documents available, such as <u>financial disclosures</u>, <u>ethics agreements</u>, <u>compliance documents</u>, <u>and Certificates of</u> <u>Divestiture</u>;
- responds to FOIA requests, publishes oversight reports and agency responses to an annual data call about their ethics program, and
- publishes its <u>correspondence with Congress</u>, and its <u>budget and management</u> <u>documents</u>.

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

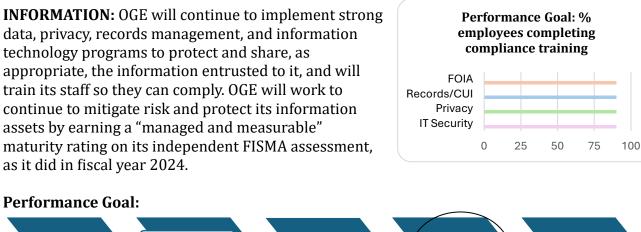


Other Indicators of Success: # ethics documents requested/fulfilled # webpage views # of public inquiries # outreach activities conducted

	Freedom of Information (FOIA)
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OGE IS AN OUTSTANDING STEWARD OF PUBLIC RESOURCES

OGE conducts its agency operations following the principle that "public service is a public trust." OGE takes seriously its compliance with the President's directives and carefully safeguards the government resources entrusted to the agency including information, taxpayer dollars, and human resources. Without compliance and good stewardship, OGE's mission work would be at risk.





Federal Information Systems Management Act Five-Level Maturity Model

TAXPAYER DOLLARS/APPROPRIATIONS: OGE will remain a good steward of taxpayer dollars, as reflected by its record of strong financial management, including saving over \$1million in rent and saving the executive branch \$50 million by offering *INTEGRITY* as a shared service. OGE will continue to pursue other efficiencies, such as the economies of scale received from using over 20 interagency agreements for shared services, and OGE direct cost-cutting initiatives. OGE will continue to maintain effective internal controls in all operations, including prompt payment and improper payment standards in order to earn an Unqualified result on its Annual Financial Audit, as it did in year 2024.



Independent Financial Audit: Four Primary Types of Reports

HUMAN RESOURCES: OGE is only able to carry out its mission because of its high-performing, crossfunctional staff. Every one of OGE's staff supports multiple mission programs and is held accountable for performance.



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OGE Fiscal Year 2026 Budget Justification and Annual Performance Plan