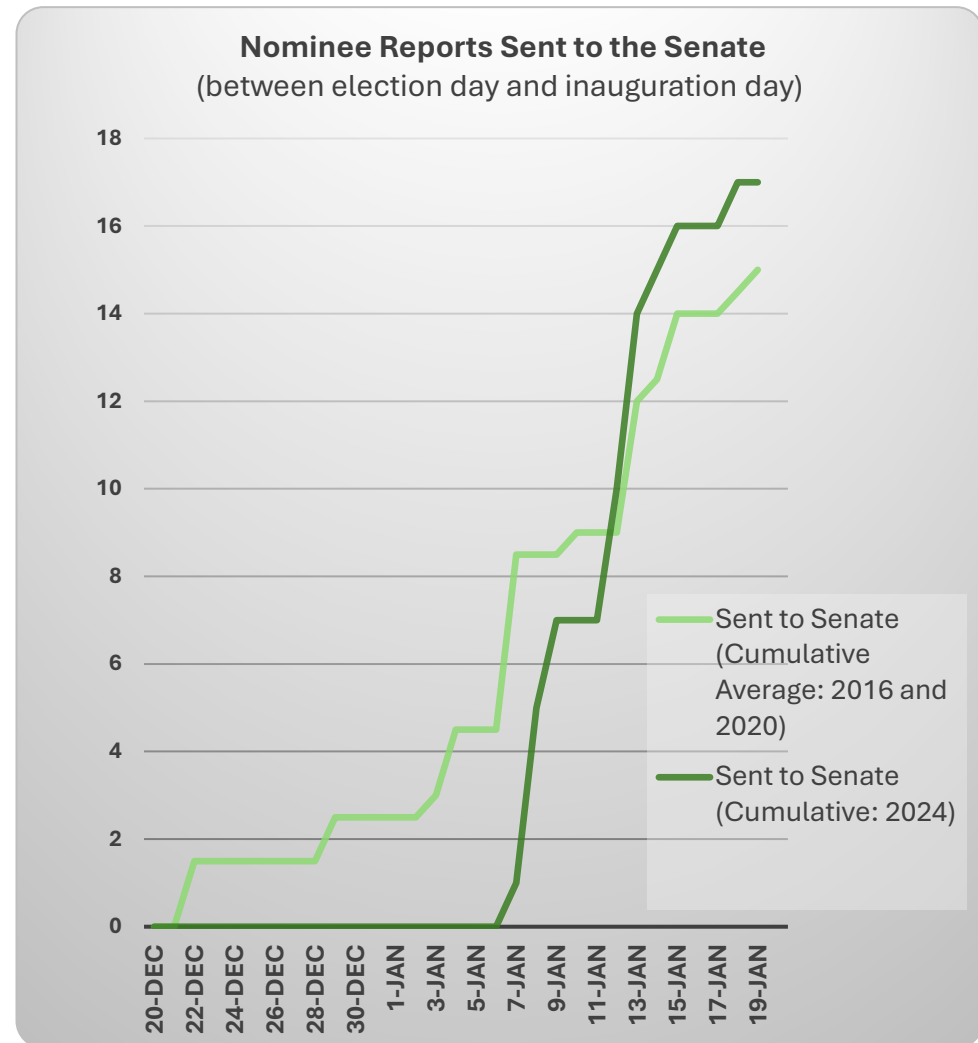
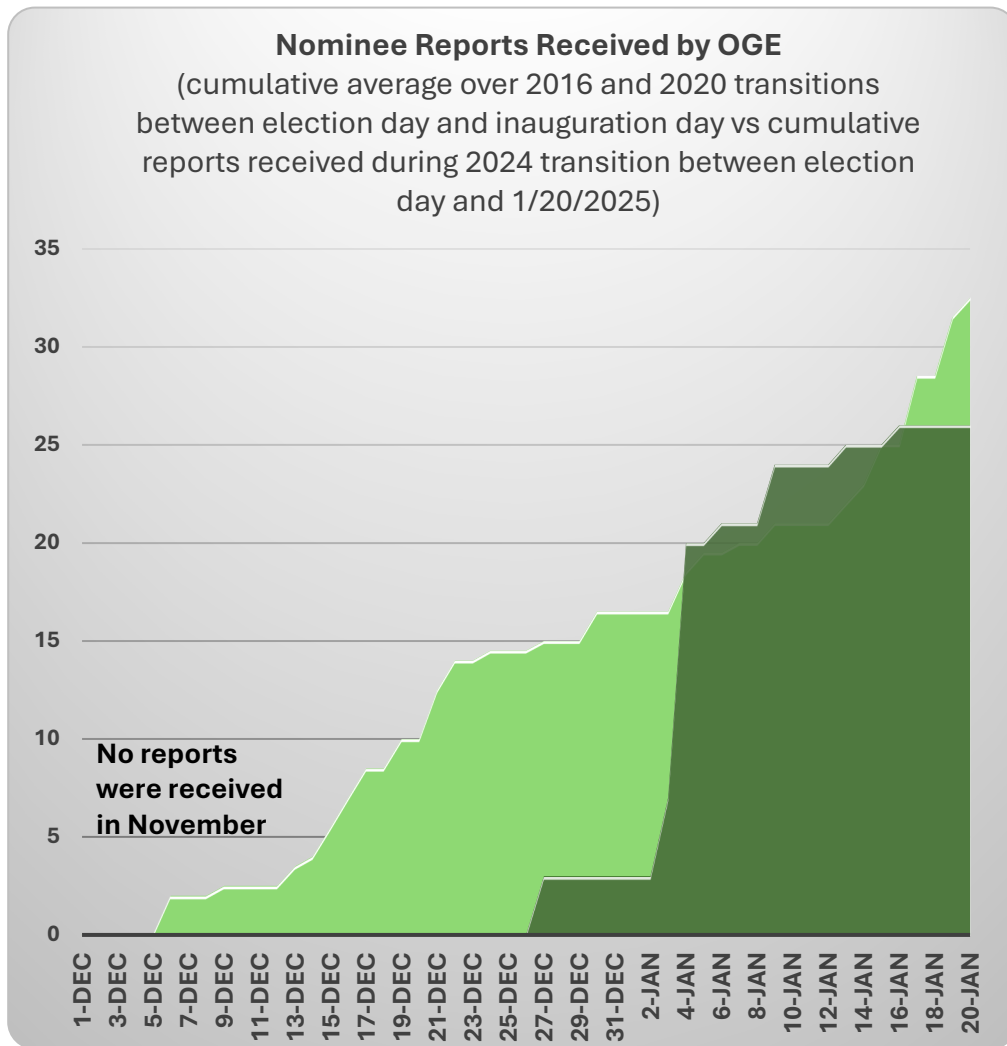


Nominee Financial Disclosure Review During Presidential Transitions (2016, 2020, and 2024) (Election Day to Inauguration)

During the 2024 Transition, between December 26 and Inauguration Day, OGE received **26** nominee financial disclosure reports.

OGE sent **17** reports to the Senate prior to Inauguration compared to **17** reports in 2021 and **13** reports in 2017.



Nominee Financial Disclosure Review After Inauguration

Number of Nominee Reports Under Review

How many more nominee reports are expected?

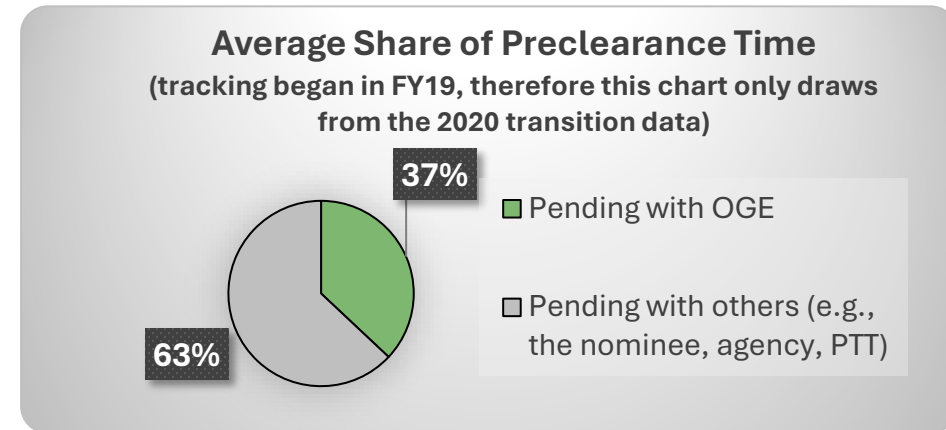
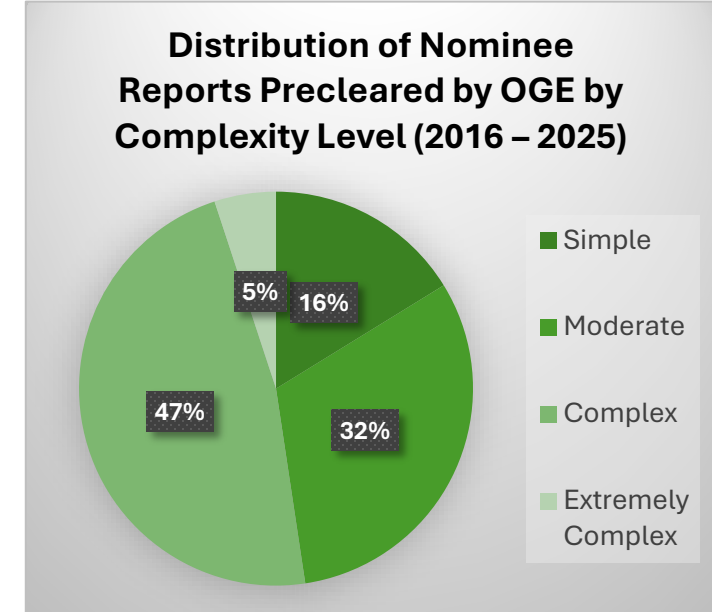
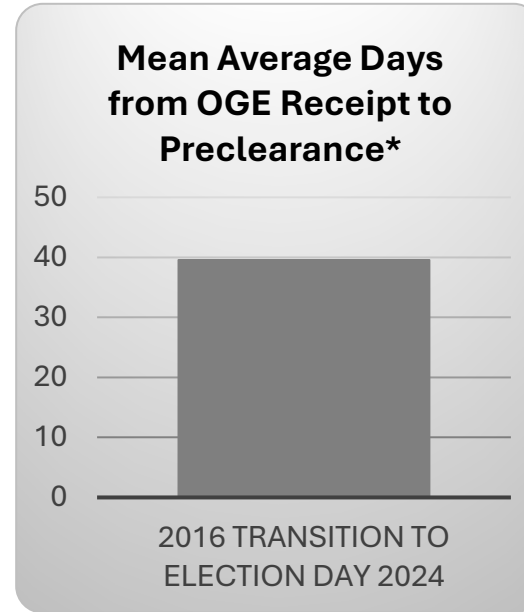
OGE and agencies will receive and review the vast majority (98.5%) of nominee financial disclosure reports after the Presidential inauguration, January 20. Approximately 1100 PAS positions turn over during a Presidential Administration.



Factors Affecting Nominee Financial Disclosure Review

What Affects How Long the Ethics Review Takes?

- The main factor is the complexity of the report. It can take time to obtain necessary information about trusts, private investment funds, and complex business relationships and to ensure they are documented correctly on a report. In addition, each investment and business relationship needs to be evaluated for potential conflicts of interest. The complexity of reports has trended upward in recent years.
- The timing also depends on how thorough a job the nominee does in preparing the report in the first instance, and how long it takes to obtain additional information. Many of the reporting requirements are quite technical, and it can take a good deal of time for nominees with extensive investments and business relationships. Reports require multiple rounds of questions and changes before pre-clearance.
- Finally, the timing can depend on the volume and priority of nominee reports going through the process at the same time as well as the limitations on OGE and agencies' resources. OGE and agency ethics officials are all dedicated to both a thorough and efficient review process.



* A nominee's ethics package is "precleared" when all substantive ethics work has been completed (i.e., all information has been received and corrected, the financial report has been reviewed, and all identified conflicts of interest are addressed in an ethics agreement). Thereafter, the ethics package can be submitted for final review and certification before its transmission to the Senate.

Steps in the Nominee Financial Disclosure Process

What Goes into the Review Process?

- OGE and the agency where the nominee will serve review each financial disclosure report to ensure that it is complete, with all the legally required information, and to conduct a review for conflicts of interest.
- Each nominee also signs an ethics agreement—a letter outlining the nominee’s understanding of their ethics obligations and identifying specific steps they will take to comply with the ethics laws.
- Completing the disclosure and agreement often requires many rounds of questions, revisions, and discussions about the nominee’s ethics commitments. Once these documents are complete, OGE issues the ethics "pre-clearance."
- Then, after preclearance and nomination, OGE begins the formal certification process. Once signed and certified, OGE transmits the nominee’s ethics materials to the appropriate Senate committee/s.

Process from Receipt by OGE to Posting a Nominee Report on OGE’s Website

This image illustrates the standard nominee financial disclosure process from initiation by the White House to OGE’s transmittal of the final report to the Senate and making the forms publicly available.

