



# WAYS THE U.S. OFFICE OF GOVERNMENT ETHICS (OGE) CAN HELP

- ❖ Briefings before and after the election
- ❖ Training on *INTEGRITY* (e-filing system)
- ❖ Review of financial disclosure reports
- ❖ Consultations on prospective nominees
- ❖ Technical assistance with ethics initiatives
- ❖ Guidance on government ethics

## Illustration of Nominee Financial Disclosure Process



## Key Dates and Critical Action Items for the Transition Team

AUGUST	☆ Receive OGE Briefing
SEPTEMBER	☆ Commit Staff to Train on <i>INTEGRITY</i>
	☆ Complete Technical Set-Up in <i>INTEGRITY</i>
OCTOBER	☆ Recruit a Government Ethics Expert
NOVEMBER	☆ Hire an Ethics Lead
	☆ Establish Procedures for Communication
	☆ Start Nominee Review Process for Priority Positions
DECEMBER	☆ Continue Nominee Process for Priority Positions

## Description of Nominee Financial Disclosure Process

Transition Team provides *Nominee Guide* to nominee • Transition Team initiates financial disclosure report in *INTEGRITY* • Release report to OGE and the agency • OGE/agency work on report with nominee (multiple rounds over several weeks) • OGE/agency draft ethics agreement • OGE “preclears” report • Public intent to nominate • Senate holds hearings before Inauguration

## ADDRESSING RISK FACTORS

- **Risk: Too little time to clear reports before Inauguration**  
Send OGE as many reports as possible in November and early December
- **Risk: Slow responses from nominees**  
Emphasize the importance of responding promptly to questions about their reports
- **Risk: Nominees’ resistance to resolving conflicts of interest**  
Advise nominees early in the process that they and their spouses may be required to divest assets
- **Risk: Confidentiality concerns**  
*INTEGRITY* is a secure system with limited access and role-based permissions
- **Risk: Issues arising from the complexity of ethics rules and the nominee process**  
Detail an agency ethics official or hire an outside financial disclosure expert