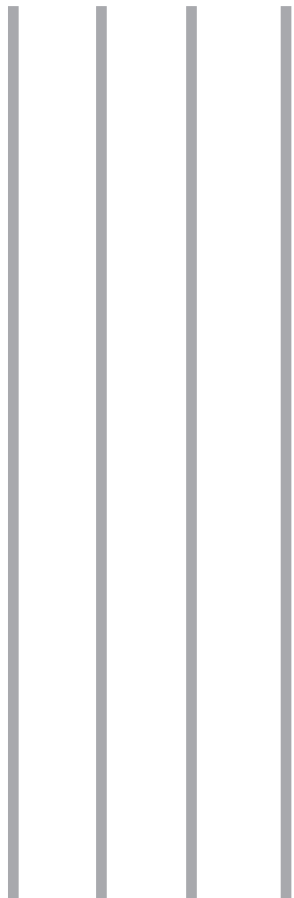
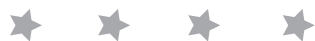


CONGRESSIONAL
BUDGET JUSTIFICATION,
ANNUAL
PERFORMANCE PLAN

FISCAL YEAR

2021



PREPARED FOR THE
COMMITTEES ON
APPROPRIATIONS

FEBRUARY 2020

UNITED STATES
OFFICE OF
GOVERNMENT
ETHICS



MISSION

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

The American people expect honest government that works on their behalf, that is transparent, and that responds to the needs of everyday people. With strong leadership and cooperation, the U.S. Office of Government Ethics (OGE) can deliver for the American people, but not without focus and resources.

OGE works tirelessly with agencies across the executive branch to build and retain the public's trust. OGE's mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch is an essential component of the public's confidence in the integrity of executive branch programs and operations. This past year, OGE has taken steps to increase transparency, partner with senior leaders to strengthen ethics across the agencies, and make sure that government leaders have qualified ethics officials to help them navigate Washington.

An investment in ethics, and in OGE, is an investment in government success. This plan is about the essential work OGE will do in the next two years, why that work is crucial to the country's success, and why OGE must be adequately resourced to be able to perform its unique and critical mission.

“THE ISSUE OF ETHICS IN GOVERNMENT IS VIEWED AS A SERIOUS PROBLEM BY ABOUT AS MANY PEOPLE (67%) AS DRUG ADDICTION – THE TOP ISSUE, AT 70%.”

Pew Research Center
Report on Trust and Distrust in America,
July 2019

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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 the Ethics in Government Act of 1978, the Ethics Reform Act of 1989, and the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act, including services as authorized by 5 U.S.C. 3109, 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, \$18,576,000.”

Budget Request Overview Narrative

OGE is requesting \$18,576,000 for fiscal year 2021 to carry out its critical role in safeguarding the public’s trust in government by preventing conflicts of interest in the executive branch. The importance of this work cannot be overstated. Without impartial and ethical decision-making, government leaders cannot deliver on their promises, perform their public duties, or serve the country and its people. OGE must have the resources to promulgate and maintain enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; support the President and the Senate in the presidential nominations process; oversee a financial disclosure system for more than 26,000 public and 380,000 confidential financial disclosure report filers; hold agency ethics programs accountable for complying with ethics laws and rules; provide expert advice and training to more than 5,000 ethics officials in the executive branch; and ensure transparency and engage the public in holding government accountable. In addition to these critical responsibilities, in FY21, OGE must also heavily draw on limited staff and systems to respond to demands related to the unique role it plays in the presidential election readiness and appointments process.

Specifically, the requested \$18,576,000 is primarily necessary to cover mandated and inflationary cost increases in OGE’s two most vital areas: staffing and systems. With the requested funding OGE will be able to cover these increases

BUDGET REQUEST	
FISCAL YEAR 2021	
FY21 REQUEST	\$18,576,000
Mandated/Inflationary/IT Total Cost Increases	+\$1,076,000 (over FY20)
(1) Workforce	+\$776,000
(a) Retirement costs	\$124,000
(b) Compensation increase	\$376,000
(c) Benefits increase	\$96,000
(d) Two IT positions	\$180,000
(2) Systems	+\$300,000
(a) Integrity operations	\$80,000
(b) OMB Max user fee	\$160,000
(c) IT licenses	\$60,000

associated with (1) maintaining the well-trained and highly skilled workforce necessary to accomplish its core mission activities, including its role in the Presidential appointment process (+\$776,000); and (2) efficiently and securely operating necessary IT systems including *Integrity*, for the highest level officials in the executive branch as well as OGE’s network and website (+\$300,000). Funding at this level will ensure that OGE is resourced both to carry out annual mission work and its unique role in identifying and resolving potential conflicts of interest in the presidential appointments process.

If the requested \$18,576,000 is granted, OGE will ensure it continues to remain a good steward of the resources entrusted to it and will maximize its impact. The agency is highly compliant, maintains strong internal controls, receives consistently clean audits, earns strong Federal Employee Viewpoint scores, and has an excellent record of performance management in carrying out its important mission work. In addition, OGE already has completed numerous major cost-cutting initiatives (see page 39) and continues to assess cost-cutting opportunities as a regular business practice. In its budget for fiscal year 2021 alone, OGE reduced costs in at least three budget object classes (23.3, 24.0 and 26.0) for nearly \$30,000 in savings. With the exception of funding to fill two junior IT specialist positions and purchase IT licenses in direct support of the President’s Management Agenda priorities (explained more fully below), OGE’s full request reflects primarily mandated and inflationary cost increases needed to deliver on its responsibilities in a year in which demand and risk are both heightened. Only with the necessary complement of its expert, cross-functional staff and with its technology systems working at full capacity can OGE successfully carry out its mission work with the heavy workload and challenging environment expected in fiscal year 2021.

Funding at the requested level will allow OGE to continue mission-critical investments in vital human and IT resources

Investment in OGE’s Expert Staff:

OGE’s most valuable asset is its staff, who tirelessly carry out the day-to-day work to accomplish the agency’s vital mission of preventing conflicts of interest in the executive branch. OGE staff members are highly trained, cross-functional experts, who each support multiple agency programs that directly impact every agency in the executive branch as illustrated in the chart below. OGE cannot accomplish any of its work without them.

	Legislative	Nominee Financial Disclosure Review	Annual Financial Disclosure Review	Int'l Outreach	Domestic Outreach	Training	Legal Policy and Advice	Agency Desk Officer	Program Review and Compliance	Agency Compliance and Internal Operations
Attorney	█	█	█	█	█	█	█	█	█	█
Program Reviewer			█	█					█	
Ethics Specialist		█	█	█		█		█		

With the recent support of OMB and Congress, OGE has focused on filling critical positions. OGE's fiscal year 2021 request supports 76 FTEs (74 current positions and 2 new requested IT positions, described below) at the most recent executive branch-wide pay raise rates and associated increased employee benefit expenses, including increases in retirement costs (+\$124,000), compensation assumptions (+\$376,000), and benefits (+\$96,000). These increased personnel costs will result in cuts and critical unfilled vacancies if OGE is not funded as requested.

OGE's staff are vital to the success of this executive branchwide program and are never more vital than during a presidential election period when, irrespective of outcome, the nation is vulnerable to national security and other risks. OGE must be prepared both to play its critical role in the presidential appointments process and to simultaneously support its important, ongoing mission work. OGE accomplishes this by cross-functionally training and deploying staff from a variety of functional areas to respond to the demands of the cyclical nature of the agency's work. In an election year, OGE must draw on a higher number of highly trained staff to analyze and resolve the complex financial conflicts of interest of the highest leaders in the executive branch at a greatly increased volume. OGE must respond to a significantly increased demand for its timely assurance to the President and the Senate that nominees can remedy their potential conflicts of interest and therefore exercise the full authorities of their positions, if confirmed. This requires both a full complement of expert staff and access to the secure technological tools they need to carry out their crucial work.

At the same time, OGE must have dedicated staff available to protect the government from ethical lapses by monitoring agency and senior leader compliance with their ethical obligations. OGE must have expert staff available to answer complex questions, provide written guidance, train ethics officials, revise regulations, and provide expert support to Inspectors General. OGE must have expert staff available to engage the public and make ethics resources publicly available so that Americans are aware of the systems in place to mitigate conflicts of interest, to hold their government accountable. Without its fully funded expert staff, OGE cannot deliver for the American people on its core mission work. Without OGE delivering on its mission, each agency's mission is at risk.

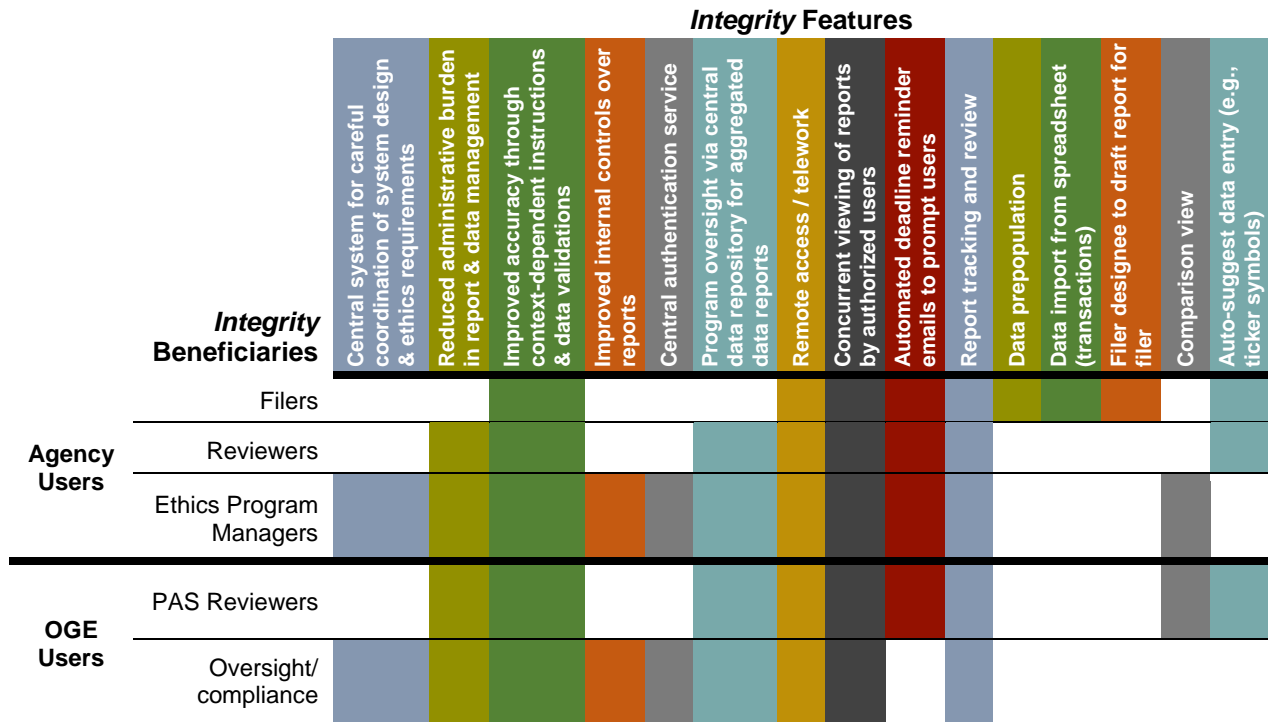
With the requested funding, OGE expects to be able to meet the increased workload resulting from the upcoming presidential election, regardless of its outcome, while continuing to serve the ongoing needs of the executive branch ethics program.

Investments in Critical IT Systems:

Increases in funding are required to successfully operate Integrity

OGE must continue to invest in the systems necessary to carry out its mission-critical work, such as *Integrity*, its executive branch-wide electronic financial disclosure filing system, as well as its network and website. The expected influx of work in the wake of the presidential election in 2020 underscores the need to keep *Integrity*, OGE's congressionally-mandated system, at peak operating capacity and availability. Since OGE developed and began operating *Integrity* over five years ago, the system has profoundly improved the public financial disclosure process for the approximately 26,000 highest-

level executive branch filers, most of whom now use the system. The current administration seamlessly adopted the system for its PAS nominees and OGE has certified more than 1,000 nominee reports in the system since 2015. A secure, web-based system that consistently receives over 90% satisfaction rates and successful independent security reviews, *Integrity* has increased the accuracy of reporting, efficiency of review, and seamless routing of reports in this highly technical filing process. As illustrated in the chart below, the system has valuable features that benefit a wide variety of users across the executive branch. In fiscal year 2021, the demands on the system will be increased by the presidential election, regardless of its outcome. For more information on *Integrity* see pages 31 & 14.



OGE provides *Integrity* as a shared quality service to all executive branch agencies at no cost. This centralization saves government resources, increases efficiency, and decreases duplication and fragmentation across the executive branch. Continued investment in this highly successful, congressionally-mandated system is vital to the success of the presidential appointment process and costs to operate the system are not static. OGE has managed to keep *Integrity's* costs relatively stable at approximately \$2.3 million annually by leveraging interagency agreements, government resources, and agency-funded enhancements. However, in fiscal year 2021 an additional \$240,000 in costs are unavoidable due to the successful growth of the system (+\$80,000) and new fees being levied by an agency partner (+\$160,000), as detailed below.

Due to the many features and benefits illustrated in the chart above, the number of *Integrity* filers and users has grown substantially to more than 22,000 filers and over 30,000 users. As a result, a modest increase in operational costs of \$80,000 per year is necessary. OGE requires \$50,000 for increased platform and authentication costs, and \$30,000 for additional server capacity. In addition, OGE's major government partner,

OMB MAX, is levying a new 10% user fee on the applications it supports to establish a new program management office. This new fee imposes \$160,000 per year in additional costs to OGE for *Integrity*.

OGE needs the requested *Integrity* funding to ensure that the system is available and secure as use and executive branch-wide reliance on the system has grown. The requested investment is necessary to support the critical needs of the executive branch ethics program, particularly in light of the coming presidential election.

Funding is needed to support OGE's IT modernization efforts

OGE's only new request in fiscal year 2021, other than cost increases associated with ongoing operations, is \$180,000 for the salary and benefits to hire two junior IT professionals and \$60,000 in software necessary to modernize OGE's IT systems. These two IT positions are necessary to support OGE's efforts to succession plan for critical vacancies, to realign its workforce to respond to changing demands and skill gaps, and to more efficiently and effectively conduct the agency's mission work. These positions are in direct support of IT modernization, data accountability, and transparency efforts, as well as OGE's focus on improving customer experience and developing a 21st century workforce. The positions would provide critical support for OGE's IT modernization plan, which includes increasing access to OGE held data, government accountability, and financial data transparency via OGE's website expansion and redesign. OGE's request also includes the \$60,000 needed for additional software licensing fees for maintenance and support of upgraded equipment necessary to modernize OGE's information technology.

Congressional Concern

In fiscal year 2020, Congress expressed concern regarding the frequency of OGE's national ethics training events (Summits).^a OGE's fiscal year 2021 budget request supports OGE's ongoing efforts to meet the professional development needs of ethics officials in a wide variety of ways, including quarterly meetings, intensive training courses, virtual training, job aids, and workshops, as well as a national training event every four years in advance of a presidential election. Executive branchwide, multi-day training events such as the National Ethics Summit require an intensive amount of staff resources drawn directly from OGE's other mission work. Therefore, if Congress wants OGE to hold such events more often, OGE would require an additional \$294,000 not included in its fiscal year 2021 request to hire two additional staff to support increased national training events.

Conclusion

OGE respectfully requests \$18,576,000 in fiscal year 2021 to undertake its important mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch, including its critical role in the presidential appointments process. With this funding, OGE will retain the necessary complement of its expert, cross-functional staff and maintain its IT systems working at full capacity. These staff and system

^a "The Committee urges OGE to more frequently hold these summits [National Government Ethics Summits], and to increase engagement with designated agency ethics officials across agencies to reaffirm the importance of ethics." H. Rept. 116-122, at 74 (2019).

are necessary both to carry out OGE's important ongoing mission work and to successfully respond to the heavy workload and challenging environment expected in fiscal year 2021 related to the presidential election.

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)

		2019	2020	2021
	<u>Object Class</u>	<u>Enacted</u>	<u>Enacted</u>	<u>Request</u>
11.1	Salaries	\$8,819	\$9,353	\$9,838 ^b
12.1	Benefits	\$2,695	\$2,861	\$3,177 ^c
21.0	Travel	\$3	\$5	\$5
22.0	Transportation (Freight)	\$2	\$1	\$3
23.1	Rental Payments to GSA	\$1,401	\$1,417	\$1,434
23.3	Communications and Utilities	\$122	\$120	\$93
24.0	Printing and Reproduction	\$62	\$87	\$86
25.2	Other Services	\$3,734	\$3,524	\$3,767 ^d
26.0	Supplies and Materials	\$84	\$87	\$69
31.0	Equipment	\$97	\$45 ^e	\$104
99.0	Subtotal	\$17,019	\$17,500	\$18,576
99.0	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$17,744	\$18,225	\$19,301
	FTEs	71	77	76 ^f

^b Includes mandated increases for awards and retirement benefits.

^c Benefit ratio of salaries to benefits rose from 30% to 31% due to COLA increases.

^d Includes expected increase in OMB management fees and additional server costs associated with operating *Integrity*.

^e Reflects temporary reduction of maintenance support & license renewal fees because of new equipment.

^f Although 2 new positions are requested, 3 other positions will not be filled due to reorganization and consolidation of duties for a net total of minus 1.

Section II – About OGE

The U.S. Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978, provides overall leadership and oversight of the executive branch ethics program, which is designed to prevent and resolve conflicts of interest. OGE’s mission is part of the very foundation of public service. The first principle in the Fourteen General Principles of Ethical Conduct for Government Officers and Employees provides that “Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.”

Each day, some part of the ethics program is at work in every agency in the executive branch. The program ensures that executive branch leaders are aware of their ethical obligations and role in creating an ethical culture in their organizations as they begin government service. It ensures that public servants at all levels remain free from conflicts of interest and even the appearance of conflicts of interest, as they carry out the responsibilities the American people have entrusted to them. It ensures that employees who are seeking to leave the government avoid conflicts of interest and, after they leave, ensures that they do not exercise undue influence over their former agencies on behalf of others. Above all, it is working to protect the public’s trust in government.

Institutional Integrity in the Executive Branch

The Ethics in Government Act charges OGE with leading the effort to prevent conflicts of interest in the executive branch. OGE undertakes this important prevention mission as part of a framework comprising executive branch agencies and entities whose work focuses on institutional integrity. In addition to government ethics, this framework includes merit system protections in the civil service; full and open competition in



Figure 1: Institutional Integrity

procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement. Potential violations of legal authorities established under this framework, including government ethics authorities, are primarily investigated by Inspectors General (IGs) staff members across the executive branch. If IGs find evidence supporting a violation, they notify the Department of Justice, which has authority to prosecute individuals who violate ethics laws.

Within this framework, the ethics program works to ensure that public servants carry out the governmental responsibilities entrusted to them with impartiality, and serve as good stewards of public resources. Toward these goals, the mission of the ethics program centers on preventing conflicts of interest and the appearance of conflicts of interest that stem from employees’ financial interests; business or personal relationships; misuse of official position, official time, or public resources; and the receipt of gifts.

Taken together, the systems in place to identify and resolve conflicts of interest establish a foundation on which to build and sustain an ethical culture in the executive branch.

OGE and Executive Branch Agencies

The executive branch ethics program is a shared responsibility. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. The head of each 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.



Figure 2: OGE and the Executive Branch

The agency head is also responsible for selecting a Designated Agency Ethics Official (DAEO), the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. Usually, the support of additional professional ethics staff is necessary to effectively carry out ethics program responsibilities. Each agency's employees, supervisors, human resource officials, and Inspector General also play a significant role in maintaining the integrity of government programs and operations.

How OGE Provides Leadership and Oversight

To carry out its vital leadership and oversight responsibilities for the executive branch ethics program, OGE:

- promulgates, maintains, and advises on enforceable standards of ethical conduct for more than 2.7 million employees in over 130 executive branch agencies, including the White House;
- offers education and training to the more than 5,000 ethics officials executive branchwide;
- operates and maintains *Integrity*, a public financial disclosure management application required by the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge (STOCK) Act of 2012;
- oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers;
- monitors executive branch agency ethics programs and senior leaders' compliance with applicable ethics laws and regulations;

- prepares for presidential transitions and provides assistance to the President and Senate in the presidential appointments process;
- conducts outreach to the general public, the private sector, and non-governmental organizations; and
- makes ethics documents publicly available.



Figure 3: OGE Organizational Chart

OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, and other key personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE is led by a Director who is confirmed by the Senate and appointed to a 5-year term by the President. As shown in

the organizational chart in Figure 3, in addition to the Office of the Director, OGE is divided into four divisions that work together to carry out OGE’s mission.

Long-Term Strategic Goals



Figure 4: Strategic Goals and Objectives Framework

The public can have greater confidence in the integrity of executive branch programs and operations when government decisions are made free from conflicts of interest. OGE’s four strategic goals for fiscal years 2018 through 2022 – uniformity, accountability, continuity, and engagement – reflect the long-term outcomes that OGE

strives to achieve in order to prevent and resolve conflicts of interest. OGE's budget priorities for fiscal year 2021 support achievement of these strategic goals.

Strategic Goal I: Advance a Strong, *Uniform* Executive Branch Ethics Program

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

Strategic Goal III: Contribute to the *Continuity* of Senior Leadership in the Executive Branch

Strategic Goal IV: *Engage* the Public in Overseeing Government Integrity

Section III – Fiscal Years 2020 and 2021 Performance Plan

OGE's planned work reflects the agency's commitment to fulfilling its vital mission of preventing conflicts of interest in the federal executive branch. Through this work, OGE strives to ensure the integrity of government programs and operations and to increase public confidence in the impartiality of government decision-making. OGE translates its important mission into strategic goals and objectives. OGE then assesses its success in achieving these goals and objectives by measuring progress on its performance goals.

Organized by strategic goal and objective, this section describes OGE's planned work for fiscal years 2020 and 2021. Information on how OGE will measure progress toward achieving its strategic goals can be found in Appendix A.

Priority Work

OGE's budget request directly supports OGE's mission-critical work, including providing direct support and training to ethics officials, refining and issuing guidance, conducting program reviews, reviewing public financial disclosures, and providing the public with access to a wide array of ethics documents. Beyond its crucial ongoing work, OGE has identified the following planned work as priorities in fiscal years 2020 and 2021:

- ❖ Election Readiness – see page 27 for more information.
- ❖ Rulemaking - see page 18 for more information.
- ❖ Holding the 2020 National Government Ethics Summit – see page 15 for more information.
- ❖ Redesigning OGE's Website – see page 40 for more information.
- ❖ Investing in OGE's Human Resources – see pages 2, 27, and 38 for more information.

STRATEGIC GOAL



ADVANCE A STRONG, UNIFORM EXECUTIVE BRANCH ETHICS PROGRAM

Every day, thousands of dedicated public servants work to protect the executive branch from ethical lapses and failures. When their efforts at prevention fall short, agencies can be crippled by scandal, the public's trust can be eroded, important work may be delayed or derailed, and leaders may be forced from office.

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE has developed three objectives:

- (1.1) Provide expert guidance to stakeholders;
- (1.2) Strengthen the expertise of ethics officials who are integral to the executive branch ethics program; and
- (1.3) Continuously refine ethics policy and issuing interpretive guidance.

Without expert guidance, agencies and their leaders are left to best-guess at the solutions to complex ethical dilemmas, with little or no consistency across the executive branch. Without well-trained ethics officials, agency leaders and employees are deprived of counsel that can help them manage risks. Without timely guidance, emerging challenges go unaddressed.

Some of OGE's most vital work is supporting ethics officials to ensure that they properly understand and are able to implement the ethics laws and policies that OGE issues and interprets.



Strategic Objective 1.1: Provide expert guidance to stakeholders

OGE strengthens uniformity by providing expert guidance and support to stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. In fiscal years 2020 and 2021, OGE will continue to provide quality Desk Officer services and effective assistance to a wide variety of key stakeholders, including Congress and Inspectors General. OGE will also continue to disseminate relevant information and create opportunities for ethics practitioners to engage with OGE and each other. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

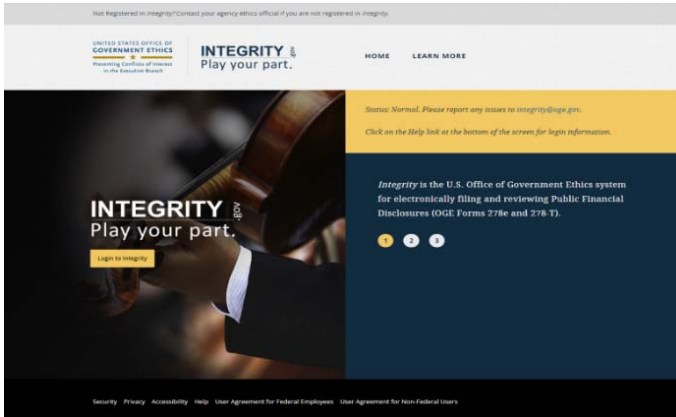
- OGE is unable to respond to questions timely, leaving agency employees and leaders without protection from ethics risks.
- OGE is unable to consult with Inspectors General, delaying investigations while ethics violators remain in positions of public trust.

Assist and support agency ethics officials

OGE will continue to provide extensive support to agency ethics officials so they can provide uniform 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. On average, OGE Desk Officers respond to 1,700 calls for assistance per year (see page 18). Desk Officers help ethics officials navigate difficult policy and programmatic issues and proactively provide those officials with resources and services to assist them.

Ensure ethics officials have up-to-date information

OGE will continue to provide ethics officials with up-to-date ethics information. OGE will publish advisories and other guidance in a searchable format on its website, and provide notices of new guidance via the OGE listserv, which reaches approximately 3,500 ethics officials. OGE also will continue to host quarterly meetings with senior agency ethics officials to inform them of new guidance, resources, requirements, and trends, as well as to provide them with an opportunity to engage with each other. In fiscal year 2020, in response to stakeholder feedback, OGE will launch a redesign of its website to improve the site's research functionality (see page 40 for further discussion).



Support public financial disclosure using Integrity

OGE will continue to provide high quality support to agencies' use of *Integrity*, OGE's executive branchwide electronic public financial disclosure filing system. To support the system's more than 30,000 users (filers, administrators, and reviewers) OGE will continue to provide centralized real-time

help desk services and on-demand user resources, such as written and online tools. OGE will continue to make available training and tutorials, with a special emphasis on training leading up to the annual filing season. In addition, OGE plans to provide support to campaigns on how *Integrity* is used in the presidential appointment process, as it did in 2017.

Additional information about *Integrity* can be found on page 31.

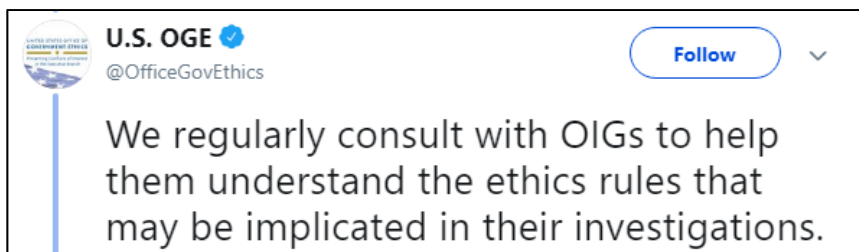
Respond to requests for technical assistance

OGE will continue to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, the Administrative Conference of the United States, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, uniform understanding of the executive branch ethics program. In fiscal year 2019, OGE responded to over 100 requests for such assistance.



Support the vital work of the ethics enforcement communities

OGE will continue to support the vital work of the ethics enforcement communities,



including Inspectors General, DOJ, and executive branch employee relations personnel, who are responsible for holding agency employees accountable for abiding



and Efficiency (CIGIE). Additional information on the training OGE provides to the enforcement communities is on page 17.

by the ethics laws and rules. OGE will continue to respond to extensive requests for expert consultations, as well as participate actively as a member of the Council of Inspectors General on Integrity

Support United States foreign policy initiatives

Finally, at the request of U.S. foreign policy agencies, OGE will continue to provide its expertise through participation in international programs designed to support and enhance U.S. foreign policy initiatives in the areas of anti-corruption and good governance. OGE also will continue to meet with foreign delegations sponsored by the State Department to provide information about U.S. implementation of ethics and good governance programs.

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

OGE seeks to strengthen the expertise of officials who are integral to carrying out an effective executive branch ethics program, including agency ethics officials, agency leaders, Inspectors General, and human resource professionals. In fiscal years 2020 and 2021, OGE will continue to provide professional development opportunities, promote ethical leadership, and provide training to support an ethical workforce. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to train new ethics officials, leaving agencies without competent counsel.
- OGE is unable to deliver orientations for newly designated agency ethics officials, leaving senior ethics officials without guidance needed to successfully lead their programs, placing the ethics program at risk.

Hold the National Government Ethics Summit



In fiscal year 2020, OGE will hold its third National Government Ethics Summit (Summit). By leveraging DC-area federal space and the expertise of ethics practitioners from within and outside government, OGE will continue its approach of providing an intensive, multi-day, high-value training event at a low cost. OGE designed the Summit concept to advance a strong, uniform program by providing attendees with opportunities to deepen their knowledge of the ethics laws and rules, engage in practical program workshops, collaborate with peers, listen to viewpoints from experts outside government, and build connections with ethics officials who can assist in resolving even the most complex

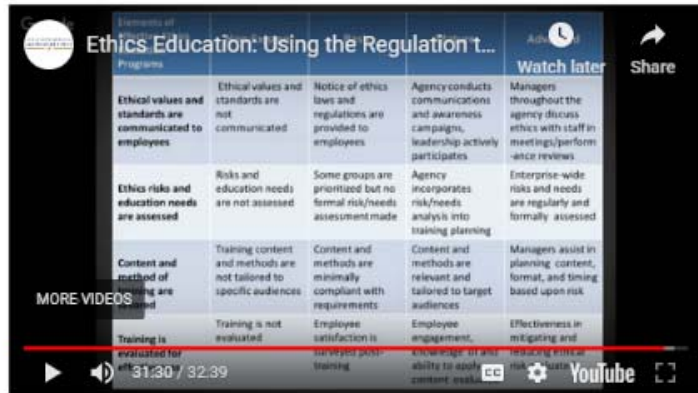
ethics issues. The Summit will bring together hundreds of executive branch ethics officials and external stakeholders, including officials from the legislative and judicial branches of the federal government, and Inspectors General staff to collaborate and prepare for the next presidential election.

Conduct critical training and professional development for ethics officials

To promote uniform implementation of agency ethics programs, OGE provides intensive training for new agency ethics leaders (DAEOs and ADAEOs), as well as comprehensive education resources for ethics officials at all experience levels. OGE also supports the development of ethics officials through its web-based "Education Library." The library includes more than 89 education resources designed for use by ethics officials, including recordings of training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity. OGE encourages ethics officials to use these resources to create self-paced curricula for their professional development.



Today, OGE held an education broadcast to help ethics officials ensure that government ethics education is responsive to risks in their organizations. You can watch here:



U.S. OGE @OfficeG... · Jun 25

Yesterday, OGE hosted a group of new senior ethics officials from across the executive branch to discuss the importance of their work protecting the trust of citizens in their government.



OGE will continue to conduct orientations for new agency ethics leaders, including targeted, intensive training for ethics officials in critical roles, and will hold workshops to create opportunities for ethics officials to collaborate. In fiscal years 2020 and 2021, OGE will develop on-demand resources regarding the nominee process, for inclusion in OGE's Institute for Ethics in Government (IEG) Resource Library, as well as conduct election readiness broadcasts and workshops.

Encourage and support ethical leadership throughout the executive branch

Ethical culture begins with demonstrated ethical leadership throughout an organization. To advance a consistently strong program, OGE will continue to seek opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will engage with senior leadership directly and indirectly through meetings, external communications, and involvement in nominee financial disclosure reports and ethics agreements, as well as through publications and educational offerings.

In fiscal years 2020 and 2021, OGE's Director will continue to request face-to-face meetings with agency heads to discuss their role in setting an ethical culture at their agencies. OGE will continue 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 2020, OGE will also develop and share training and tools targeted to supervisors regarding their roles and responsibilities as ethical leaders. Finally, through ongoing research and partnerships with others, OGE will share tools and tactics for leaders to use to effectively communicate the ethical expectations for their organizations.

Provide resources to support an ethical federal workforce

OGE recognizes that maintaining strong ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. To support the ethical service of all executive branch employees, OGE will continue to provide a collection of training resources for new and current federal employees, share model practices for communicating about

ethics within organizations, and leverage opportunities to directly discuss ethical standards with groups of federal employees.

Provide training to enforcement and human capital communities

In support of OGE's goal of a strong, uniform ethics program, OGE will continue to train and collaborate with members of the ethics enforcement communities. OGE will continue to provide training as part of the Inspector General Criminal Investigator Academy's Public Corruption Investigations Training Program (PCITP) and present at meetings of the Council of Counsels to Inspectors General. OGE plans to invite members from these communities to participate in the next National Government Ethics Summit.



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

OGE's guidance enables ethics officials to provide more uniform implementation of the ethics program executive branchwide and provide consistent guidance to their employees, thereby reducing agency risk. In fiscal years 2020 and 2021, OGE will continue to review, refine, and issue interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE's planned work are described below.

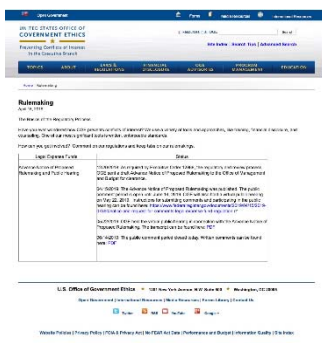
Consequences of Underresourced Ethics:

- OGE is unable to issue guidance, particularly on new and evolving ethics issues, resulting in inconsistency and confusion across the executive branch on ethics policies.
- OGE is unable to timely update ethics regulations, leaving outdated and less effective rules in place and delaying reforms that would improve ethics policies.

Provide timely ethics guidance

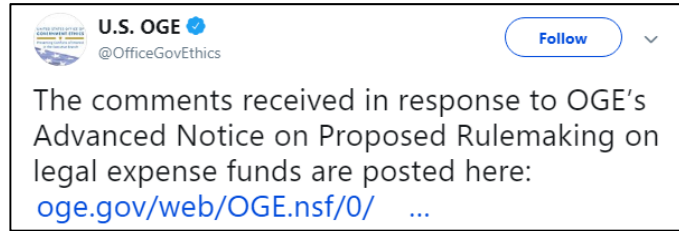
In fiscal years 2020 and 2021, OGE plans to issue advisories that provide interpretive guidance on topics including social media, the role of supervisors in the ethics program, and the ability to publicly release ethics documents. OGE will also publish guidance concerning commonly occurring issues surrounding a presidential election, such as the use of gift exceptions and post-government employment guidance. In developing these advisories, OGE will continue to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance. OGE will use its listserv, website, desk officer services, and training broadcasts to ensure its guidance is widely disseminated.

Publish final and proposed ethics rules



OGE plans to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards) by publishing a proposed regulation in fiscal year 2020 and a final rule in fiscal year 2021. In addition, OGE will continue the process of modifying the Standards by amending the conditions under which an executive branch employee may accept a gift of legal expenses. OGE gathered stakeholder input on gifts of legal expenses during fiscal year 2019 and plans to publish a proposed regulation during fiscal year 2020 and a final regulation in fiscal year 2021.

OGE will also continue its in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions in fiscal year 2020. Finally, in fiscal years 2020 and 2021, OGE will continue to consult with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs.



Renew Ethics Program Forms

In fiscal years 2020 and 2021, OGE will begin the review and comment process to renew several important ethics program forms that collect information vital to the program. OGE will seek to renew both the public financial disclosure form (OGE 278e) and the confidential financial disclosure form (OGE 450). OGE will also seek to renew the form used by the public to request public financial disclosure reports and related documents (OGE Form 201: Request to Inspect or Receive Copies of OGE Form 278 or Other Covered Records). In addition, OGE will update its System of Records Notices (SORNs) to mitigate risk by including language that would allow contractors access to systems to address breaches.

STRATEGIC GOAL



HOLD THE EXECUTIVE BRANCH ACCOUNTABLE FOR CARRYING OUT AN EFFECTIVE ETHICS PROGRAM

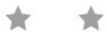
Today, there is a functioning ethics program in each of the more than 130 agencies across the executive branch. When a program fails to prevent an ethics violation, that agency can be crippled. A scandal can delay initiatives, void contracts, slow reforms, and oust leaders. An agency may spend months, or even years, mired in an investigation, congressional hearings, and litigation. Ethics failures erode the trust between Americans and their government, resulting in less support, more suspicion, and reductions in cooperation and compliance. When an ethics program fails, 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 executive branch ethics program, OGE has developed two strategic objectives:

- (2.1) Monitor agency compliance with executive branch ethics program requirements; and
- (2.2) Monitor senior leaders' compliance with individual ethics commitments.

If agencies are not held accountable for maintaining compliant ethics programs, systemic problems may multiply. If senior leaders are not held to their individual ethics commitments, the public cannot be certain that the government and its leaders are acting in their interest. Without accountability, the entire system is at risk.

OGE is constantly working to improve its oversight function to better prevent ethical failures. Doing so requires people, time, and technology. Only if properly resourced can OGE best protect the government from ethical lapses.



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

OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at each agency, as well as to identify executive branchwide trends. In fiscal years 2020 and 2021, OGE will continue to conduct reviews of agency ethics programs and collect data about each agency's program and the overall executive branch ethics program. OGE will also continue to request ethics program data from agencies to address current issues that require oversight. Key highlights of OGE's planned work are described below.

Conduct agency ethics program reviews

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. In fiscal years 2020 and 2021, OGE will implement a new risk-based approach to conducting these reviews, but the purpose of the reviews will not change. OGE reviews agency programs to identify and report on the strengths and weaknesses of the program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program. OGE's new risk-based model increases the frequency of reviews for cabinet-level agencies, as well as other agencies determined to be at a higher risk, based on OGE's risk assessment, from a five-year review cycle to a four-year cycle, and provides for more real-time consultations and other compliance-based interventions.

Consequences of Underresourced Ethics:

- OGE is unable to ensure that agencies are maintaining compliant ethics programs, leaving systemic problems unaddressed and agency programs vulnerable to ethical lapses and scandal.

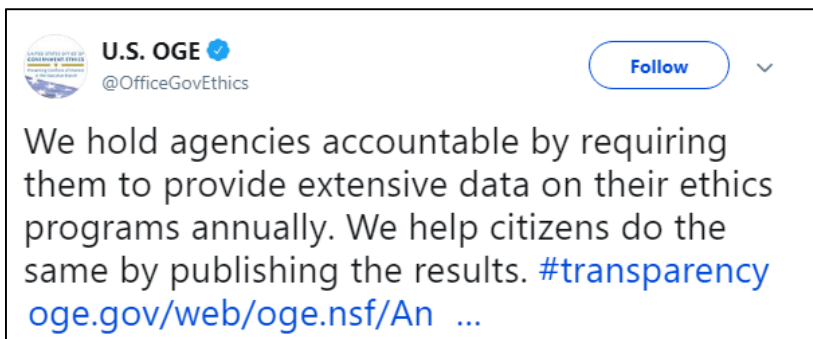
ETHICS PROGRAM INSPECTION REPORT		UNITED STATES OFFICE OF GOVERNMENT ETHICS Preventing Conflicts of Interest in the Executive Branch		
Agency:				
Report No.:	Date:			
Period Covered by Review:				
1.0 AGENCY DATA				
EMPLOYEES				
1.1	Number of full-time agency employees.	(From Engagement Quest.)		
1.2	Number of Presidential-appointed, Senate-confirmed (PAS) public financial disclosure reports required to be filed.	(From Annual Quest.)		
1.3	Number of non-PAS public financial disclosure reports required to be filed.	(From Annual Quest.)		
1.4	Number of confidential financial disclosure reports required to be filed.	(From Annual Quest.)		
ETHICS PROGRAM				
1.5	Title of Designated Agency Ethics Official (DAEO).	(From Engagement Quest.)		
1.6	Grade level of DAEO.	(From Engagement Quest.)		
1.7	Title of Alternate DAEO (ADAEO).	(From Engagement Quest.)		
1.8	Grade level of ADAEO.	(From Engagement Quest.)		
1.9	Title of the primary, day-to-day ethics program administrator.	(From Engagement Quest.)		
1.10	Grade level of the primary, day-to-day ethics program administrator.	(From Engagement Quest.)		
1.11	Current number of full-time ethics officials.	(From Engagement Quest.)		
1.12	Current number of part-time ethics officials.	(From Engagement Quest.)		
1.13	Number of reporting levels between the DAEO and the agency head.	(From Engagement Quest.)		
COMMENTS				
2.0 LEADERSHIP				
COMPLIANCE REQUIREMENTS				
2.1	OGE has received an up-to-date designation from the agency head naming the DAEO. See 5 C.F.R. § 2638.107(a).	Yes	No	N/A
2.2	OGE has received an up-to-date designation from the agency head naming the ADAEO. See 5 C.F.R. § 2638.107(a).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS				
2.1-2.2: Compliance determination based on letters obtained from OGE files or the agency during the review. If letters are not provided, the agency will be determined to be in a state of noncompliance.				
3.0 PUBLIC FINANCIAL DISCLOSURE (OGE Form 278e, OGE Form 278-T)				
COMPLIANCE REQUIREMENTS				
The agency has written policies and procedures in place governing. See 5 U.S.C. app. IV, § 402(d)(1).				
3.1	Collection of public financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.2	Review/evaluation of public financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.3	Public availability of public financial disclosure reports.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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. OGE will conduct appropriate follow-up reviews to evaluate agencies' progress in implementing any recommendations made in OGE's program review reports. To enhance transparency and accountability, OGE will continue to publish all program reviews and follow-up program reviews on its website.

Collect and publish ethics program data

As part of OGE's oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects this data through its Annual Agency Ethics Program

Questionnaire (Annual Questionnaire). In fiscal years 2020 and 2021, OGE will continue to seek 100 percent agency compliance with this requirement and rigorously review agency responses. OGE will continue to build capacity to analyze trend data to identify areas of concern at individual agencies and across the executive branch. In fiscal years 2020 and



2021, OGE will also continue its practice of publishing a report of the aggregate data and posting individual agency responses on its website to increase transparency and oversight. Lastly, OGE will continue to use the data to provide training on the results, to encourage agencies to use the Annual Questionnaire as a tool both to self-assess and to benchmark their agency against similarly situated agencies.



Results from the **2018 Annual Agency Ethics Program Questionnaire**

A SNAPSHOT of the Executive Branch Ethics Program

CY18

In fiscal year 2019, OGE held a data call for agency practices related to providing ethics advice and counsel. The results of this data call will provide OGE insight into each agency's implementation of this key element of their ethics program. OGE will use the results to tailor the support it provides to agencies. OGE will also share the results with executive branch ethics officials so they can learn from other practitioners. In fiscal year 2020, plans to make the results of the data

call available to the public in a summary report that will be posted on its website.

OGE will also continue 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, OGE makes these reports available, on its website, as required by statute.

Collect information on potential ethics violations by executive branch employees



The Department of Justice has the power to prosecute individuals who violate ethics and conflicts laws. Read about recent prosecutions in OGE's annual Prosecution Survey here: oge.gov/Web/oge.nsf/Le ...

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 in the event 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.

Publish a new resource: Ethics Program Management Guide

In fiscal year 2020, OGE will publish a Program Management Guide, as part of its website redesign, for ethics officials. This comprehensive guide will explain all of the elements of administering an ethics program, including the authorities for the program, compliance components and deadlines, key ethics rules applicable to employees, remedies for potential and actual conflicts of interest, the financial disclosure program, training requirements, advice and counsel responsibilities, program reporting, and records management. This guide will include practical tips and links to key OGE advisories, job aids, and online resources.

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

OGE monitors senior leaders' compliance with their individual ethics commitments to ensure that executive branch officials conduct the government's business impartially. In fiscal years 2020 and 2021, OGE will continue to monitor agency leaders' compliance with their ethics agreements and provide a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to ensure that senior leaders have timely complied with their ethics commitments, decreasing public confidence that their decision making is in the best interest of the government and is not being driven by their personal financial interests.
- OGE is unable to timely review and certify public financial disclosure reports, leaving potential conflicts of interest unaddressed and leaders vulnerable to inadvertent criminal violations.

Monitor incoming agency leaders' compliance with their commitments to resolve conflicts of interest

OGE will continue 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. OGE will continue to monitor compliance by PAS officials with their commitments to timely resolve conflicts of interest, as reflected in their ethics agreements. OGE will continue to collect a Certification of Ethics Agreement Compliance from each appointee, which requires appointees to personally attest to their ethics agreement compliance. In support of transparency and accountability, OGE will continue to post these certifications, as well as notices of late compliance

and extensions, on its website.

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
2. Resignations	I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. I have filed a periodic transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of those agreed upon divestitures.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A Filing Date(s) of OGE Form 278-T Report(s):
4. Managed Accounts	If I have a managed account or am the trustee of an investment professional, I have notified the manager or professional of the divestitures indicated in my ethics agreement. In addition, I am continuing to monitor purchases.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Lateral Recalls	I complied with my interim recall obligations pending the divestitures required by my ethics agreement.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

Provide expert, second-level review of periodic and annual financial disclosure reports of appointees at the highest-level executive branch positions



OGE will continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements. In fiscal year 2019, OGE closed nearly 1,800 reports. OGE will 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, including the requirement to timely submit reports to OGE and to promptly provide any additional information necessary for

OGE to certify the reports. Lastly, OGE will continue to provide timely access to these disclosures on its website, as described on page 35.

Review requests for Certificates of Divestiture

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 individuals 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. OGE will continue to review requests for CDs and make them available electronically through the OGE Form 201 request process.

Consult with agencies regarding the issuance of waivers 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.” OGE will continue to consult with agencies prior to the issuance of such waivers and collect copies of final waivers.

STRATEGIC GOAL



CONTRIBUTE TO THE CONTINUITY OF SENIOR LEADERSHIP IN THE EXECUTIVE BRANCH

The country is at its most vulnerable in the period immediately following a presidential election. It is essential to the country's safety and security that the President is able to quickly nominate and appoint new leaders in executive branch agencies. It is essential that the Senate is timely assured by OGE that nominees can remedy potential conflicts of interest so they may exercise the full authorities of their positions if confirmed.

To achieve its strategic goal of contributing to the continuity of senior leadership in the executive branch, OGE has developed two strategic objectives:

- (3.1) Prepare for a presidential transition; and
- (3.2) Provide assistance to the President and the Senate in the presidential appointment process.

Failing to prepare for presidential transitions or to effectively assist the President and the Senate in the presidential appointment process can result in critical leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk.

OGE is constantly working to more efficiently review increasingly complex financial holdings to identify and remedy conflicts of interest for incoming senior leaders. Through its dedicated and expert staff, high-quality training and resources, and the application of secure technology, OGE strives to successfully carry out its role in the presidential appointment process.



Strategic Objective 3.1: Preparing for a presidential transition

PRESIDENTIAL TRANSITION

OGE has a unique and important role in the change in top political leadership in the executive branch. As a result, OGE must focus significant resources on preparing for the possibility of new executive branch leadership after a presidential election every four years. In fiscal years 2020 and 2021, to prepare for the high turnover expected to result from the presidential election, irrespective of the outcome, OGE will participate in federal transition councils, collaborate with other transition service providers, update necessary resources, publish guidance, and provide training on post-election topics. OGE will also continue to work with the representatives of presidential candidates in connection with their financial disclosure reports and will provide support to presidential campaigns. Key highlights of OGE's planned work are described below.

Consequences of Underresourced Ethics:

- OGE is unable to prepare for presidential transition, resulting in delayed nominations and agencies without leadership.

Participate in meetings, develop training plans, and review resources

Actively participate in meetings

In fiscal year 2020, OGE will actively participate as a member of federal transition councils, such as the Agency Transition Directors Council established by the Presidential Transition Improvement Act of 2015. This Council, which includes a senior representative from OGE, is responsible for coordinating transition activities among the Executive Office of the President, agencies, and the transition team of eligible candidates and the President-elect; providing guidance to agencies in gathering briefing materials and information relating to a presidential transition; and ensuring agencies adequately prepare career employees who are designated to fill non-career positions during a presidential transition.

OGE will also continue to meet and engage with additional stakeholders in preparation for a transition, including non-governmental organization councils, such as the Partnership for Public Service's Presidential Transition Service Providers' Council.

Develop and conduct training

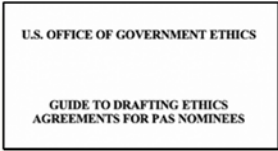

OGE will develop and implement comprehensive transition-related training for OGE staff and ethics officials. Internally, OGE will build capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition by drawing on cross-functional professional staff, including recently filled vacancies, and implementing an intensive experiential learning plan over the year prior to the election. Filling remaining critical staff vacancies early in fiscal year 2020 is vital to enabling OGE to respond to the significant increase in demand for its expertise and review.

OGE will also develop and implement a comprehensive plan of training for agency ethics officials. Beginning with the Summit in March of 2020 and continuing through and beyond the election, OGE will provide significant support to agency ethics officials to ensure that they are prepared for their enhanced responsibilities and the increased workload associated with the presidential election. OGE will also develop ethics education tools for ethics officials to use to help prepare career leaders when there are changes in senior leadership at their agency.

In addition, OGE will train and collaborate with a variety of external stakeholders. For example, because of its unique role, OGE will provide training to Senate staff on OGE’s role in the nomination process. OGE will also collaborate with the General Services Administration (GSA) to provide on-site assistance as part of GSA’s responsibility to provide pre-election services and facilities to eligible candidates for President or Vice President. Through this initiative, OGE will offer early and ongoing ethics support and training on *Integrity*, OGE’s secure, web-based system for collecting and reviewing public financial disclosure reports. OGE will also regularly update its stakeholders and the public on the progress made through these collaborations, through its quarterly meetings with ethics officials, Twitter feed, and website.

Update key resources for financial disclosure filers and reviewers

OGE will review and update the key resources described below:

<p>Ethics Agreement Guide</p>	<p>The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements for PAS nominees.</p>	
<p>Transition Guide</p>	<p>The Transition Guide is a resource for the Presidential Transition Team to prepare for the upcoming transition so that top leadership positions can be filled quickly and free from conflicts of interest.</p>	
<p>Nominee Ethics Guide</p>	<p>The Nominee Ethics Guide is a resource for potential Presidentially appointed, Senate-confirmed (PAS) nominees. The Guide contains helpful guidance for incoming PAS nominees, including an introduction to the nominee process, guidance on financial disclosure, and an overview of key ethics rules and regulations.</p>	

As part of its review and update process, OGE will seek input from stakeholders on these resources and will streamline its internal processes based on lessons learned from the 2017 presidential transition.

Issue guidance and determine election readiness

OGE also plans to issue guidance concerning common issues surrounding a presidential election, such as post-government employment. OGE will also add some additional steps to the ethics program review process to determine if agencies are election ready.

Maintain Integrity

OGE will continue to successfully operate *Integrity*, its executive branchwide electronic public financial disclosure system, to improve the quality of filing, review, and certification of public financial disclosure reports. In fiscal year 2020, OGE expects that more than 22,000 of the highest level officials in the executive branch will be using the system to file nominee, annual, periodic transaction, and termination reports. In fiscal year 2021, this number will increase due to the expected surge of PAS nominees, irrespective of the outcome of the election. OGE will also maintain its responsiveness to requests by the Administration for targeted enhancements, as well as enhancements required to address evolving security requirements, and to prepare for the 2020 election. See page 31 for more information about *Integrity*.

Strategic Objective 3.2: Providing assistance to the President and the Senate in the presidential appointment process

Following a presidential election and throughout an administration, OGE continuously assists the President and the Senate in the presidential appointment process. In fiscal years 2020 and 2021, OGE will provide an independent review of the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed,

Consequences of Underresourced Ethics:

- OGE is unable to review nominee reports and craft ethics agreements, leaving the President unable to timely appoint agency leaders.
- OGE is unable to transmit nominee financial disclosure reports to the Senate, delaying hearings and leaving agencies without leaders.
- OGE is unable to maintain its electronic financial disclosure filing system, resulting in more than 22,000 senior officials reverting to less efficient and less accurate paper filing of financial disclosure reports, significant delays in review and certification, and unresolved conflicts of interest left unidentified and unaddressed.

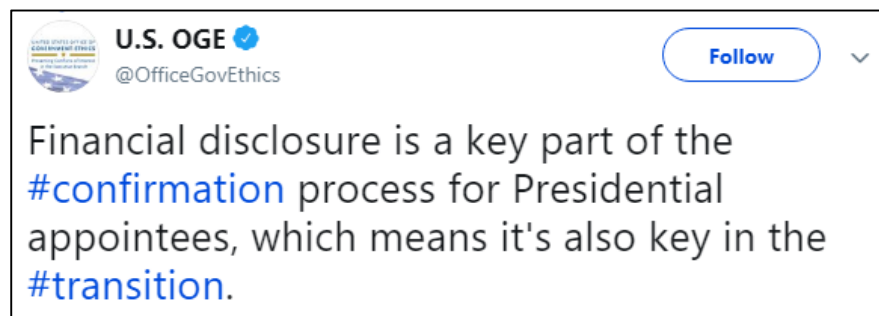
Senate-confirmed (PAS) nominees and presidential and vice presidential candidates. Key highlights of OGE's planned work are described below.

Provide expert, second-level review of financial disclosure reports of nominees to highest-level executive branch positions

In fiscal year 2021, OGE will review for financial conflicts of interest and certify a greatly increased volume of public financial disclosure reports resulting from the 2020 presidential election, regardless of the outcome of the election. Specifically, OGE works with agency ethics officials to identify and resolve any conflicts of interest incoming PAS leaders may have. This work is especially critical during a presidential transition when, due to vacancies in most senior leadership positions, the nation is particularly vulnerable to national security and other risks. Therefore, the full resources requested for staffing and *Integrity* funding is vital in 2020 and 2021 to ensure that OGE is ready for and performs effectively during the post-election period.

Based on past experience, the volume of PAS nominee financial disclosure filings in fiscal year 2021 will likely double when compared with

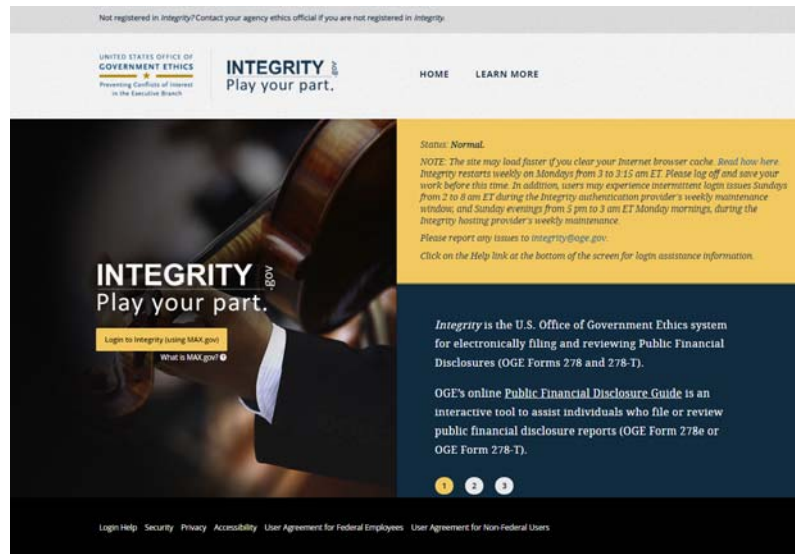
fiscal year 2020. OGE will identify and resolve potential conflicts of interest on the part of the nominees by establishing written ethics agreements with all nominees prior to their confirmations. In fiscal year 2021, OGE will shift its staff resources as necessary to timely review financial disclosure filings and analyze and resolve the potential conflicts of interest of incoming executive branch leaders, to provide these incoming leaders an introduction to their new ethical responsibilities as public servants. OGE will also provide departing officials with post-government employment guidance.



Successfully operate Integrity and use the system to review and analyze the financial disclosure reports submitted during the presidential transition

In fiscal year 2019, OGE invested in a significant change in the architecture of *Integrity* to increase the capacity and speed of the system, as the number of users continues to increase. In fiscal year 2020, OGE plans to accelerate migration to a multi-server architecture. OGE also improved system security by encrypting *Integrity's* data at rest. By fiscal year 2021, OGE plans to add a tool so agencies can delete certified reports that reach the records retention limits.

In fiscal years 2020 and 2021, OGE will work to ensure that *Integrity* continues to run reliably for current filers and will focus on ensuring secure, stable system operations and high quality support for *Integrity*, as heavy use continues. OGE will also work to ensure that *Integrity* efficiently manages the increased number and more complex filings of new PAS nominees who are expected to use the system during the post-election period and continues to produce high-quality financial disclosures by helping filers more accurately report required information.



ENGAGE THE PUBLIC IN OVERSEEING GOVERNMENT INTEGRITY

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility, helping to make the American people aware that there are systems in place and mechanisms available to hold their government accountable. OGE works to give the public reasons to trust their government, and acknowledges when officials violate that trust. OGE finds Americans where they are, on social media, through the press, and indirectly through Congress, and gives them the information they need to verify that their executive branch officials are free from conflicts of interest, and that their officials are working on behalf of the American people and not for personal or others' financial interests.

To achieve its strategic goal of engaging the public in overseeing government integrity, OGE has developed two strategic objectives:

- (4.1) Inform the public about OGE and the executive branch ethics program;
and
- (4.2) Make ethics information publicly available.

If the public does not have the information it needs to ensure that government leaders are free from conflicts of interest, their trust in government may erode, and they may become convinced that the leaders are prioritizing private interests over the nation's interests.



Strategic Objective 4.1: Inform the public about OGE and the executive branch ethics program

OGE informs the public and other key stakeholders about OGE and the executive branch ethics program to raise awareness of the systems and processes in place to detect and resolve conflicts of interest. This enables the public to hold government officials accountable. In fiscal years 2020 and 2021, OGE will continue its external communications efforts to increase understanding of the executive branch ethics program. Key highlights of OGE's planned work are described below.

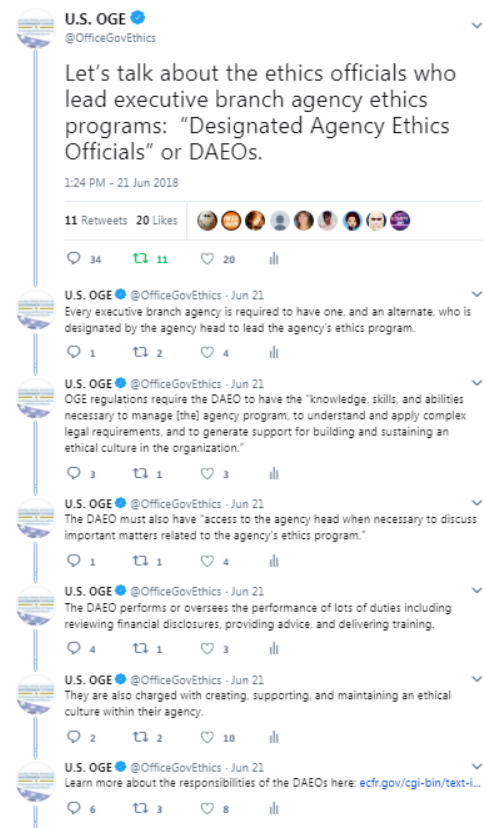
Consequences of Underresourced Ethics:

- OGE is unable to help the public and the media understand ethics requirements, resulting in less accurate news coverage and unwarranted criticism of government leaders.
- OGE is unable to maintain its website, resulting in less timely and accurate ethics information, confused government officials, and less informed Americans.

Provide relevant, understandable information to enable Americans to hold their government accountable

Without accurate information Americans cannot make informed judgments about the integrity of their government. When Americans feel that information is being withheld, they may become suspicious, and their confidence in their government may erode.

To promote public confidence, OGE has a responsibility to communicate effectively about the executive branch ethics program. OGE communicates with the public directly through publications, its website, and social media. OGE also communicates with Americans through the media and government watchdog groups. In fiscal years 2020 and 2021, OGE will continue to ensure that its communications are accurate, compelling, relevant, and tailored to each targeted audience, as well as delivered through effective communication channels. For example, OGE will continue to use Twitter and its website to dispel misconceptions, explain how to access documents, illustrate how various ethics documents relate to each other, and outline the various roles and responsibilities of individuals within the ethics program. When appropriate, OGE will also seek input from the public on ways the agency can improve its communications efforts.



A robust dialogue between Americans and their government is essential to the success of the nation. OGE will do its part to make sure the American people have the information they need to hold their executive branch officials accountable for ethical conduct.

Timely respond to external requests for information and assistance

Outside interest in the executive branch ethics program has grown significantly in recent years. Inquiries from the public, the press, Congress, and associations require OGE's timely attention and response. When these stakeholders do not receive information timely, they may publish inaccurate stories, take hasty action, or simply lose confidence in the integrity of the executive branch.

To ensure that these stakeholders have the information they need, when they need it, OGE will timely respond to the expected 1,000 external requests for information and assistance received each year from the public, the press, Congress, and various associations. Through such interactions, OGE aims to increase awareness and understanding of the executive branch ethics laws and regulations, and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and publishing helpful information on its website.

Collaborate with and engage a broader array of stakeholders

Ethics in government is a shared concern across all segments of society. To succeed, OGE must learn from experts in diverse fields spread out across the country. To make sure that agency ethics programs are informed by the most current research, OGE plans to seek information from academic institutions conducting research in the areas of organizational behavior, risk management, and behavioral interventions.



We're Listening: Last week we attended the [#OversightSummit18](#). We appreciated the opportunity to hear a wide range of ideas on how to improve oversight of the federal government.

OGE will also continue to participate as a member of private sector, state, and local ethics organizations such as the Council on Governmental Ethics Laws (COGEL), in addition to federal interagency groups, such as the Small Agency Council Forum. OGE will seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission, such as the Partnership for Public Service. Through meetings, presentations, and online forums, OGE will also continue to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. In addition, OGE will continue to collaborate with the most

senior ethics practitioners from all three branches of government to discuss issues of common interest and to build valuable relationships among the three branches.

Strategic Objective 4.2: Make ethics information publicly available

OGE makes ethics information publicly available to help the American public hold senior leaders accountable for making decisions that are based on the interests of the public rather than their own personal financial interests. In fiscal years 2020 and 2021, OGE will continue to make ethics documents publicly available. Key highlights of OGE’s planned work are described below.

Consequences of Underresourced Ethics:

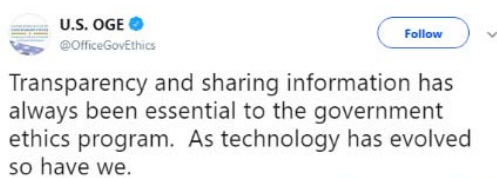
- OGE is unable to timely publish ethics documents, leaving the public unable to verify that leaders are free from conflicts of interest and to hold OGE accountable.

Make Ethics Documents Publicly Available

To ensure that ethics information is publicly available and to promote overall



transparency in governmental decision-making, in fiscal years 2020 and 2021 OGE will continue to timely post a variety of critical ethics documents on its website. These documents include 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. OGE will also continue to



remind agencies of their obligation to promptly make available ethics documents.

OGE will build on its efforts to inform the public about the availability and usability of this information by streamlining the process to access information and making it easier to navigate and view the data on its website. These efforts will include a redesign of OGE’s website, to include a new transparency portal. From this portal, individuals will be able to



search and filter individual and agency ethics program documents by type, date, and agency.

Finally, OGE will maintain its strong FOIA program. In recent years, OGE's volume of FOIA requests has remained higher than its historical average, driven in part by the public's ongoing interest in government ethics issues. To increase transparency and respond to burgeoning public interest, OGE will continue its practice of proactively posting on its website documents released in response to FOIA requests that are of particular interest to the public.



U.S. OGE 
@OfficeGovEthics

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On our FOIA page you can find out how to make a request, read documents that have been frequently requested, and see all the documents that have been released since January 1, 2017.
[oge.gov/Web/OGE.nsf/Fr ...](https://oge.gov/Web/OGE.nsf/Fr...)

MANAGEMENT OBJECTIVES

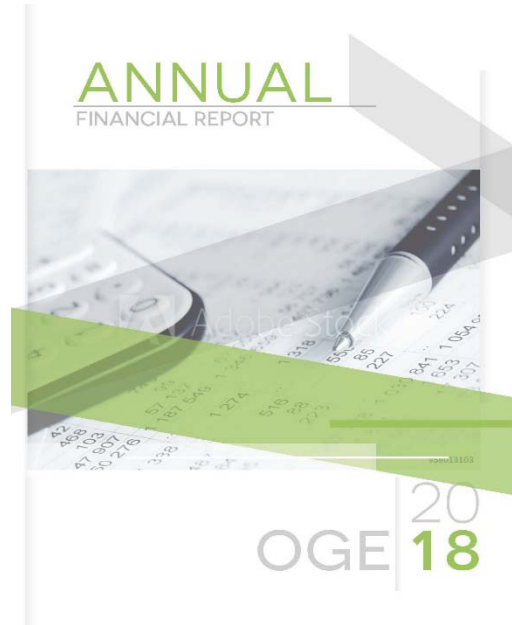


OGE must be a strong, well-run agency in order to carry out its critical mission of preventing conflicts of interests in the executive branch. As the leader of the executive branch ethics program, OGE believes it is important that OGE serves as a model agency. Therefore, OGE strives to be a responsible steward of taxpayer dollars and remain compliant with the wide array of requirements applicable to federal agencies. Just as important is supporting the development of OGE's most valuable asset--its staff, who work tirelessly to carry out the day-to-day work to accomplish the agency's vital mission.

In support of its mission and strategic goals, OGE has developed three management objectives:

- (5.1) Sustain a strong culture of performance management
- (5.2) Strengthen fiscal stewardship and organizational compliance
- (5.3) Continuously enhance OGE's information systems and processes

Fiscal stewardship: OGE will remain a good steward of taxpayer dollars, as reflected by its existing track record of strong financial management. OGE already has completed numerous cost-cutting initiatives, and continues to assess cost-cutting opportunities as a regular business practice. For example, OGE has reduced its office space costs by shrinking its footprint by over one-third and by digitizing its records. OGE has also used in-house information technology specialists to design, develop, and create internal applications, significantly increasing staff efficiency and reducing contracting costs. In fiscal years 2020 and 2021, OGE will continue to pursue efficiencies, such as the economies of scale received from using shared service centers for a significant number of support services.



Internal controls: OGE will continue to maintain effective internal controls over financial reporting, including the design, implementation, and maintenance of internal controls relevant to the preparation and fair presentation of financial statements that are free from material misstatement. OGE will continue to monitor and evaluate implemented internal controls, constantly seeking improved methods and accountability to guard against potential fraudulent practices.

Tracking purchases and inventory: Using a dedicated application on its internal network, OGE will continue to maintain its effective process for approving requisitions, which builds in additional internal controls and tracking to ensure that OGE remains fiscally responsible. OGE will also continue to track its inventory of IT equipment and furniture.

Independent audit: OGE will continue to undergo independent audits of its financial statements to ensure that they are presented fairly in all material respects and in accordance with generally accepted accounting principle. OGE will continue to ensure that there are no material weaknesses in internal controls over financial reporting and that OGE continues to comply with applicable laws, regulations, contracts, and grant agreements.

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

Records: OGE will maintain a robust records program in fiscal years 2020 and 2021. OGE plans to implement NARA-approved records disposition schedules; update file plans in accordance with NARA-approved records disposition schedules; prepare permanent electronic records for transfer to NARA, upon approval of records disposition schedules; and develop a records management manual.

Privacy: In fiscal years 2020 and 2021, OGE's privacy program will conduct and document cyclical reviews of the OGE Privacy Plan and supporting documents to ensure compliance with OMB guidelines; conduct annual privacy training; comply with annual FISMA privacy program reporting requirements; and engage with other small agency privacy program leaders to establish a community of practice.

Management Objective 5.3: Continuously enhance OGE's information systems and processes

OGE will continue to prioritize enhancing and securing its information systems, network, and website, as well as numerous mission-critical applications. Without strong information systems and processes, the agency cannot operate effectively in this digital age or efficiently perform its critical mission activities. OGE's budget request of two additional IT personnel directly support the work described below.

OGE's security program

In fiscal years 2020 and 2021, OGE's security program will continue to provide mandatory annual cybersecurity awareness training; review weekly network perimeter scans performed by the Department of Homeland Security; conduct and review monthly scans of the internal OGE network; procure and participate in annual security assessment reviews conducted by an accredited independent auditor; deploy, configure, and maintain PIV card-compatible network copiers and scanners; and develop a tool to provide online cybersecurity awareness and privacy training.

Strengthen internal applications and streamline data collection

OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal years 2020 and 2021, OGE will continue 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 that support internal operations such as requisition processing, budget formulation, and equipment tracking.



OGE is updating its website. If you use our site and would like to help us improve it, you can complete a brief survey here: surveymonkey.com/r/LD9JXDJ

launch a redesigned website that will improve public access to ethics documents, ethics officials' access to key resources needed to perform their jobs, and strengthen IT security.

OGE's website

OGE's website is its main communication tool and most important resource for OGE's stakeholders, including agency officials, the media, and the general public. In fiscal year 2020, OGE will

Based on feedback gathered in fiscal year 2019, OGE will make targeted improvements to the search function on the site to enhance the ability to conduct legal research and find ethics documents. As part of the process of redesigning its website, OGE is ensuring, to the greatest extent practicable, that each redesigned section, form, application or digital service: (1) is accessible to individuals with disabilities in accordance with section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d); (2) has a consistent appearance; (3) does not overlap with or duplicate any legacy websites and, if applicable, ensures that legacy websites are regularly reviewed, eliminated, and consolidated; (4) contains a search function that allows users to easily search content intended for public use; (5) is provided through an industry standard secure connection; (6) is designed around user needs with data-driven analysis influencing management and development decisions, using qualitative and quantitative data to determine user goals, needs, and behaviors, and continually test the website, web-based form, web-based application, or digital service to ensure that user needs are addressed; (7) provides users of the new or redesigned website, web-based form, web-based application, or digital service with the option for a more customized digital experience that allows users to complete digital transactions in an efficient and accurate manner; and (8) is fully functional and usable on common mobile devices.

Section IV – Conclusion

The important work OGE does is critical to the public’s confidence in executive branch officials and operations. OGE simply cannot carry out its crucial work without the necessary resources.

OGE requires its full requested funding of \$18,576,000 in fiscal year 2021 to undertake its important mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch. An underresourced OGE creates significant risk, undermines the integrity of government operations, and further strains public confidence. Only with a full complement of its expert, cross-functional staff and IT systems working at full capacity can OGE face the heavy workload and challenging environment that likely lie ahead in fiscal year 2021.

For all of the vital reasons outlined here and in its justification, OGE urges the approval of its request for \$18,576,000, to fund the agency in fiscal year 2021.

**“THE ISSUE OF ETHICS
IN GOVERNMENT IS
VIEWED AS A SERIOUS
PROBLEM BY ABOUT
AS MANY PEOPLE
(67%) AS DRUG
ADDICTION – THE TOP
ISSUE, AT 70%.”**

*Pew Research Center
Report on Trust and
Distrust in America,
July 2019*

Appendix A – Fiscal Years 2020 and 2021 Performance Goals

Strategic Goal I: Advance a Strong, <u>Uniform</u> Executive Branch Ethics Program			
Strategic Objectives	Performance Goals	Fiscal Year 2020 Target	Fiscal Year 2021 Target
1.1: Provide expert guidance and support to stakeholders	OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps officials perform their ethics job duties.	85%	85%
	Agency administrators are satisfied with the support provided by OGE on <i>Integrity</i> , its electronic public financial disclosure filing system.	70%	70%
1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program	After participating in an OGE training event, officials believe they can more effectively perform their ethics job functions.	90%	90%
	After using a learning tool provided by OGE, officials believe they can more effectively perform their ethics job functions.	85%	85%
1.3: Continuously refine ethics policy and issue interpretive guidance	Legal and Program Advisories help officials perform their ethics job duties.	80%	80%

Strategic Goal II: Hold Executive Branch Agencies Accountable for Carrying Out an Effective Ethics Program

Strategic Objectives	Performance Goals	Fiscal Year 2020 Target	Fiscal Year 2021 Target
2.1: Monitor agency compliance with executive branch ethics program requirements	In cases in which OGE identifies a program weakness, OGE's program review results in improvements in the agency's ethics program.	75%	75%
	Agency ethics programs are reviewed within established time frames.	20% of agencies	20% of agencies
2.2: Monitor senior leaders' compliance with individual ethics commitments	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE for second-level review are closed within established time frames.	90%	90%

Strategic Goal III: Contribute to the <u>Continuity</u> of Senior Leadership in the Executive Branch			
Strategic Objectives	Performance Goals	Fiscal Year 2020 Target	Fiscal Year 2021 Target
3.1: Prepare for a presidential transition	Actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth presidential transitions.	Milestone: Provide expertise and/or resources.	Milestone: Provide expertise and/or resources.
	Key transition-related resources are updated within established time frames.	<p>Publish updated Ethics Agreement Guide (guide to drafting ethics agreements for PAS nominees).</p> <p>Publish the Transition Guide.</p> <p>Update the Nominee Ethics Guide and Appendix.</p>	Provide guidance on any executive branchwide ethics initiative by the Administration, including any Executive Orders.
3.2: Provide assistance to the President and the Senate in the presidential appointment process	Initial comments on draft financial disclosure reports of presidential nominees for Senate-confirmed appointments are provided to the agency within established time frames.	85%	85%
	Final financial disclosure reports of presidential nominees for Senate-confirmed appointments are certified by OGE within established time frames.	90%	90%

Strategic Goal IV: Engage the Public in Overseeing Government Integrity			
Strategic Objectives	Performance Goals	Fiscal Year 2020 Target	Fiscal Year 2021 Target
4.1: Inform the public about OGE and the executive branch ethics program	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: - Number of ethics documents viewed - # of Public Inquiries - # of Outreach Activities - Twitter engagement rate	Indicators: - Number of ethics documents viewed - # of Public Inquiries - # of Outreach Activities - Twitter engagement rate
4.2: Make ethics information publicly available	Ethics documents are posted within established time frames.	85%	85%

Management Objectives			
Management Objectives	Performance Goals	Fiscal Year 2020 Target	Fiscal Year 2021 Target
5.1: Sustain a Strong Culture of Performance Management	OGE's Employee Engagement Index score on the Employee Viewpoint Survey.	80%	80%
	Create or revise standard operating procedures for key agency programs.	4 per year	4 per year
5.2: Strengthen organizational compliance and fiscal stewardship	Percentage of OGE employees that take required training (i.e., records, security, privacy, ethics).	90%	90%
	Results of annual financial audit.	Unqualified opinion	Unqualified opinion
5.3: Continuously enhance OGE's information systems and processes	Percent of non-maintenance downtime of <i>Integrity</i> , OGE's network, and website.	<i>Integrity</i> = Establish Baseline Network and Website = <1.0%	<i>Integrity</i> = 1.0% Network and Website = <1.0%
	Results of Cybersecurity Risk Management Assessment.	Managing risk for majority of categories	Managing risk for majority of categories