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"Rummaging in the government's attic"

Description of document:	Office of Government Ethics (OGE) post-election transition preparation plan for the change in administration in January 2017, 2016
Requested date:	07-March-2016
Released date:	31-March-2016
Posted date:	02-May-2016
Source of document:	Freedom of Information Act request OGE FOIA Officer Office of Government Ethics Suite 500 1201 New York Avenue, NW Washington, DC 20005-3917 Email: usoge@oge.gov

UNITED STATES OFFICE OF
GOVERNMENT ETHICS
★

March 31, 2016

Sent via email only

Tracking No: OGE FOIA FY 16/031

The U.S. Office of Government Ethics (OGE) is granting your Freedom of Information Act (FOIA) request, which was received by the OGE FOIA Office on March 7, 2016. In your request, you asked for a "copy of the OGE plan describing preparations for the post-election period and the surge in the nominee report review program following the change in administration in January 2017." We are enclosing 140 pages. These records are being provided to you without charge.

The OGE official responsible for this FOIA determination is the undersigned. OGE recently revised its FOIA regulations. If you consider this response to be a denial of your request, you may administratively appeal this determination in accordance with the FOIA, as codified at 5 U.S.C. § 552(a)(6)(A), and OGE's updated FOIA regulations, at 5 C.F.R. § 2604.304, to the Program Counsel, U.S. Office of Government Ethics, 1201 New York Avenue, N.W., Suite 500, Washington, DC 20005-3917. Any such appeal must be in writing and must be sent within 45 days of the date you receive this response letter. If you do appeal, you should include copies of your request and this response, together with a statement of why you believe this initial determination is in error. Also, if you appeal, you should clearly indicate on the envelope and in the letter that it is a "Freedom of Information Act Appeal."

Sincerely,

JENNIFER
MATIS

Digitally signed by JENNIFER MATIS
DN: c=US, o=U.S. Government,
ou=Office of Government Ethics,
cn=JENNIFER MATIS,
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Date: 2016.03.31 13:49:46 -04'00'

Jennifer Matis
Alternate OGE FOIA Officer

Enclosures

OGE's Transition Preparation

OGE's Nominee Role

- Reviews the financial disclosure reports of prospective Presidential nominees for compliance with the reporting requirements of the Ethics in Government Act (EIGA).
- Works with the nominee, the nominee's prospective agency, and the White House to prepare an individual ethics agreement, which highlights actions the nominee will take to avoid or resolve any potential conflicts of interest.
- OGE's nominee work is ongoing. There is a surge during Transition years, but reviewing nominee financial disclosure reports is a significant part of OGE's work even during non-Transition years.
    - OGE continuously refines and streamlines the nominee program.
    - OGE continuously trains OGE staff and agency ethics officials on nominee financial disclosure.

2009 and 2013 Transitions Highlights

- Built internal capacity and prepared agency ethics officials for the 2009 and 2013 transitions.
    - February 2008 Regional Conference on nominee financial disclosure.
    - Trained additional OGE staff on nominee financial disclosure.
- Produced and posted on OGE's website a Presidential Transition Guide for PAS.
- Met with representatives of both major Presidential candidates' campaign teams prior to the elections, providing training on the development of effective ethics programs.
- In 2008, OGE submitted to Congress proposed legislation that would streamline and simplify public financial disclosure requirements under EIGA.
- In FY 2009, OGE reviewed the highest volume of reports on record for the program.
- In 2012, OGE participated in the Working Group on Streamlining Paperwork for Executive Nominations.   The working group issued two reports to Congress in fiscal year 2013 recommending ways to improve the appointment process.

Preparing for 2017 Transition

Pre-2014

- In 2010, OGE replaced the Standard Form (SF) 278 with the OGE Form 278, which increased OGE's flexibility to modify and update the 278 in the future.
- In 2012, OGE updated and clarified the Executive Branch Qualified Trust rules.

- OGE developed an internal working document identifying all the PAS positions that are reviewed by OGE.
- Created a Financial Disclosure Program Assistant position and hired for that position.

2014

- OGE hired a senior counsel to the Presidential Nominations Branch to provide legal guidance and to serve as an additional high level reviewer.
- In 2014, OGE reissued the "Ethics Agreement Guide" with updates based on the ethics community's experiences.
  - The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements.
  - This guide has made the certification process more efficient.
- Held an Advanced Financial Disclosure all-day seminar during the Ethics Summit.
  - It has established consistency among the ethics agreements of different agencies.
- LA-14-05: Financial Disclosure Requirements for Pooled Investment Funds
- LA-14-06: Flexibility in Ensuring and Documenting Compliance with Ethics Agreements

2015 (January – November)

- OGE developed and implemented a comprehensive training plan for OGE staff to build internal capacity to handle the surge in volume of nominee financial disclosure reports.
- OGE staff developed and implemented a redesigned executive branch public financial disclosure form, the OGE Form 278e.
- OGE submitted to OPM and DOJ proposed revisions to the regulations governing Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture found at 5 CFR Part 2634. The revisions would:
  - Incorporate requirements imposed by the STOCK Act
  - Clarify and modernize language.
- LA-15-06: Employee Benefit Plans Through Which Employees Hold Diversified Pooled Investment Funds and Employee Benefit Plans Established or Maintained Outside of the United States
- LA-15-09: Diversified and Sector Real Estate Funds
- OGE conducted briefings for Senate committee staff members regarding OGE's role in nominees' public financial disclosure, and to introduce Senate staff to the Integrity system and the new OGE Form 278e.
- OGE replaced its financial disclosure tracking system for nominees with an enhanced tracking system.
- OGE refined and streamlined internal processes.

- Rolled out of *Integrity*.
- Issued a Program Advisory on the implementation of *Integrity* and the new OGE Form 278e.
- Worked with Presidential campaigns on candidate financial disclosure reports.
- OGE met with and collaborated with GSA and Partnership for Public Service on the Transition website.

Pre-convention (December 2015 – July 2016)

- *Integrity*
  - OGE is in the process of implementing the nominee functionality of the *Integrity* system.
    - OGE has developed the nominee functionality in *Integrity*.
    - OGE has tested the nominee functionality in *Integrity*.
    - OGE has started using *Integrity* for nominees.

  - Benefits of *Integrity*:
    - "Wizard" functionality asks filers to answer a variety of questions related to their financial holdings and outside positions and then logically collects the required reporting information based on their responses to these questions.
    - Reduces filer error.
    - Eliminates filer confusion that routinely results from attempting to follow the complex written instructions associated with the paper-based OGE Form 278.
    - Provides for a seamless, paperless review process.
    - Creates a more efficient process by providing the ability for OGE, the agency, and the filer (or representative) to make real-time changes to report.
    - *Integrity* provides WH with ability to check report without contacting OGE or agency.
    - Allows filer to use Nominee report to pre-populate a subsequent Annual report, eliminating the need to re-type information once confirmed.
    - Increases OGE's access to agency information in support of advancing data-driven, evidenced-based decision making.
    - *Integrity* makes available across the executive branch an effective e-filing system at no cost to agencies, thereby minimizing the need for agencies to expend resources on their own systems.

- OGE is continuing with its comprehensive training plan for OGE staff to build internal capacity to handle the surge in volume of nominee financial disclosure reports.
- Transition training will be the focus of the March 2016 Government Ethics Summit. This will be a four day training event with a full day focused entirely on nominee financial disclosure and the other three days focused on Transition related topics.
- OGE will issue a web-based, plain English guide for the OGE Form 278e.
  - This guide will assist senior officials required to complete public financial disclosure reports.
  - It will eliminate many of the errors typically found in financial disclosure reports, thereby expediting the ethics clearance of candidates for Presidential nominations.
- OGE is in the process of developing a guide for nominees to:
  - Introduce the nominee process
  - Introduce financial disclosure
  - Provide tips on financial disclosure
  - Introduce key ethics rules
  - Provide links to OGE's website
  - Provide tip sheets that are detailed and targeted to various audiences (e.g., attorneys, corporate officers, fund managers, etc.)
  - Provide key resources
- OGE will develop a guide for the Transition Team to:
  - Introduce key ethics rules
  - Provide contact information
  - Provide key resources
- Post-employment FAQs Legal Advisory

Challenges/Recommendations

- In addition to OGE, agencies need to dedicate resources to build their capacity to handle the transition. This is particularly important for agencies that will handle a large volume of nominee reports.
- Agencies need to start using the *Integrity* system for nominees and other filers to be prepared to use it during transition.

Post-convention (July 2016 – November 2016)

- OGE will reach out to members of each candidate's representatives to offer assistance with financial disclosure for potential nominees.
- OGE will extend invitations to members of each candidate's representatives to raise their awareness of relevant ethics issues, to provide an introduction to the *Integrity* system, and to build relationships with the executive branch ethics community.

- OGE will provide guidance to representatives of each candidate on the legal requirements imposed by the Executive Branch ethics program and on the development of effective ethics programs.
- OGE, agency ethics officials, and the outgoing White House Counsel's Office will provide training on seeking employment and post-employment and individualized guidance.

Challenges/Recommendations

- Not having early access to the campaigns/transition teams for each candidate.
- Financial disclosure is a process. Potential nominees need to start working on their financial disclosure reports early. Each candidate needs to have a team working on this before the election.

Post-election (November 2016-January 2017)

- OGE will work with the Transition Team for the President-elect and agencies to review nominee financial disclosure reports and develop ethics agreements. At this point the reports will likely be the Cabinet and Cabinet-level positions.
- The transition team will likely consult with OGE about reports and the conflicts analysis for senior White House staff (these are not PAS).
- If the President-elect is considering implementing a new executive order establishing new ethics rules, this will likely be developed during this period. OGE needs to be involved in the development of the new executive order.
- OGE, agency ethics officials, and the outgoing White House Counsel's Office will provide training on seeking employment and post-employment and individualized guidance.
- At this point, every agency **must** be using the *Integrity* system for nominee filers.
- OGE will provide ethics guidance to the departing Administration and to the Transition Team, including guidance for managing the ethics program for White House staff.

Challenges/Recommendations

- Not having early access to the Transition Team.
- It is crucial that the Transition Team includes an experienced executive branch ethics official.
- Agency ethics programs need to be able to handle a surge in ethics related work.
    - Agencies, particularly those with large volume of nominees, need to have enough trained staff to handle the surge in nominee reports.

- o In addition to an increase in volume of nominee and new entrant reports, agencies will have an increase in volume in termination reports.
  - o Agencies will have to counsel incoming leaders on the ethics rules and assist departing officials with post-employment responsibilities.
- Senior leadership at the agencies needs to support the ethics program.
- If there is a new executive order establishing new ethics rules, OGE needs to be involved in the development of the new executive order. In the midst of OGE's busiest time, OGE will have to dedicate resources to implementing the new executive order.

Challenges/Recommendations related to filers
- Filers need to understand this is a process.
- Filers need to be available to answer multiple rounds of financial disclosure questions. If they are not available, their reports will stall.
- Filers need to have access to all their financial statements and have access to information about their financial arrangements.
- Filers need to understand their arrangements with their employers (e.g. what will happen to their stock options when they resign?). Filers should be prepared to work with an agency ethics official and OGE to resolve all conflicts of interest stemming from such arrangements.
- Filers need to understand they will have to make commitments in an ethics agreement to achieve compliance with applicable ethics requirements. They should not be surprised to hear that they may need to divest certain assets that pose a potential conflict and resign from certain positions, if confirmed. Spouse and minor/dependent children may also need to divest.
- OGE needs to be able to engage early with agency ethics officials about the conflicts analysis. If the transition team delays releasing the report to the agencies, this will delay the process.

Post-inauguration (January 2017-April 2017)

- OGE will work with the White House Counsel's Office and agencies to review nominee financial disclosure reports and develop ethics agreements. This is a period of extremely high volume. The high volume will continue through December 2017.
- OGE and agencies will handle a significantly increased volume of termination financial disclosure reports from departing officials from the outgoing Administration.

Challenges/Recommendations
- Volume
- It is crucial that the new White House Counsel Office has at least one staff member who is an experienced executive branch ethics official.

- Agency ethics programs need to be able to handle a surge in ethics related work.
  - Agencies, particularly those with large volume of nominees, need to have enough staff to handle the surge in nominee reports and need to prioritize nominee reports.
  - In addition to an increase in volume of nominee and new entrant reports, agencies will have an increase in volume in termination reports.
  - Agencies will have to counsel incoming leaders on the ethics rules and assist departing officials with post-employment responsibilities.
- Senior leadership at the agencies needs to support the ethics program.
- If there is a new executive order establishing new ethics rules, OGE and the agencies will be implementing it while handling a surge in nominee reports. Based on past experience there will be a number of questions related to a new executive order.
- Full-time PAS are prohibited from receiving outside earned income and resign all compensated positions. The Obama Administration had a policy of making all full-time nominees resign from all of their outside positions, including uncompensated positons. We found this helpful for expediting the nominee review.

Challenges/Recommendations related to filers
- Filers need to understand this is a process.
- Filers need to be available to answer multiple rounds of financial disclosure questions. If they are not available, their reports will stall.
- Filers need to have access to all their financial statements and have access to information about their financial arrangements.
- Filers need to understand their arrangements with their employers (e.g. what will happen to their stock options when they resign?). Filers should be prepared to work with an agency ethics official and OGE to resolve all conflicts of interest stemming from such arrangements.
- Filers need to understand they will have to make commitments in an ethics agreement to achieve compliance with applicable ethics requirements. They should not be surprised to hear that they may need to divest certain assets that pose a potential conflict and resign from certain positions, if confirmed. Spouse and minor/dependent children may also need to divest.

Activity	When	Who/What
Meeting with mentors	ASAP	As soon as possible, Teresa and/or Heather and/or Deb will pull the mentors together to discuss these plans
(1A) Basic training class	March 31, then repeat the class within 30 days of any new hire covered by the basic training requirement – full day training	Mark presenting Teresa tracking (Sandy sitting in class, first session only) Sandy will add onto Mark's training a segment on how to look up mutual funds and publicly traded securities. She will also make sure they know what they are supposed to do on the two exercises in Deb's packet.

(1B) Information packet	Week of March 30	Deb putting together instructions and packet
		• The materials will include:
		  o Copies of the 278 and 278e
		  o Checklists we created for the WH
		  o Checklist from the nominee guide
		  o Session 2 materials (but not the answer key)
		  o LA on sector funds
		  o No more than three other advisories on basic concepts
		  o A printout of the incentive stock option materials in the nominee guide (including FAQ)
		  o A draft of Keith's "for ethics officials" guide for 278 filers
		  o A practice 278 exercise (easy one that Heather, Walt and Sandy will create)
		• Instructions: The instructions will tell employees to do the two exercises. The employees will need to meet on their own without Sandy to do the Session 2 exercise prior to their next meeting with Sandy. Teresa will schedule that meeting for them. The employees need to do the 278 exercise on their own by creating a first set of comments and by looking up the assets.
		• In April, Sandy will meet with the group, distribute the answer key to the Session 2, and lead a discussion. Sandy will discuss
		  o The answer key to session 2
		  o A walk through of the comments they should have made on the 278 exercise
		  o The other materials

		o Their questions
		o The difference between EIF and the mutual fund exemption
		o Where to find resources online (nominee guide, the old reviewer guide, how to find a legal advisory, and the transition guide with its list of relevant legal advisories, ethics agreement guide)
		• In April or May, Walt, Cheryl and/or one or more members of the nominee group will present on one or more of the following topics:
		    o EIF
		    o Breaking out an investment fund (non-EIF)
		    o Employee benefit plan exemption
		    o Mutual funds
		    o De minimis for publicly traded securities
		• In April and again in May, the mentor will meet at least once each month to discuss the employee's progress and any questions they have.

(2A) Nominee meetings	2nd and 4th Thursday of the month Starting in April.	Deb will add all of the covered employees to attend the meetings Supervisors will remind employees of the requirement. Teresa will follow up with any employees who miss meetings to find out why. Deb and Heather will stay after the meetings to see if the new employees have any questions about the matters discussed in the meeting or about financial disclosure more generally.
(2B) Practice Exercises	Distribute the exercises by mid to late April. The work on both exercises and the meeting with the mentor should be completed by the end of August. However, it is recommended that the exercise be completed by the end of May, so that the employee will have this experience before receiving actual annual reports (which will be assigned this summer, whether or not the employee	• Deb will distribute the two exercises that have answer keys. She will give the employees only the draft reports. She will give them the instruction to create a set of comments and an ethics agreement for each report. (Deb will give the answer keys, the final reports, and the ethics agreements to the mentors.) • The employees will do an exercise and then contact the mentor to request the answer key, the final report, and the ethics agreement. The mentor will give the employee these items. • The employee will schedule a follow-up meeting to go over the exercise, after the employee has read and studied the answer key, the final report, and the ethics agreement for each. (They can do both at once or one at a time, depending on what the employee and the mentor work out.)

	has completed the practice exercises).	• Note: If any of the employees say they have already done these exercises in the past, Deb will give them one of the exercises that do not have answer keys. She will give the mentor the final report (and, if applicable, the ethics agreement). The mentor will just have to use these materials to go over the employee's comments. • Teresa will follow up with the employees, and she will push the brand new reviewers who have never done reports before to complete these sooner than later.
(3) Shadow reviews	Starting in April	• Employees will begin shadowing their mentors on two reports per quarter. • Employees should meet with their mentors sooner than later to set up a schedule or a procedure. • Instructions are contained in the other document • Mentors will include the employee in at least one significant call on each report and, preferably, several calls • The mentor will be responsible for picking the reports that they will share with the employees (though they should coordinate with the employee to learn about the employee's workload and availability) • The employee will be responsible for scheduling meetings and following up promptly with the mentor, and for reminding the mentor to include the employee in calls with the agency.
(4) Shadow reviews	Starting in April	• Unlike exercise 3, the employee will not do the whole report. Instead, the employee and the mentor will meet to discuss significant real world issues that arise in connection with the report. The idea is that these would be tricky issues. • If possible, the employee will sit in on some calls, but this may not be possible if the issue is significant and fast moving.
(5) Book club	Starting in May Prior to the beginning of each month distribute materials, ask for RSVPs During the month, lead the discussion (but not train)	• We will do this each month • Keith, Deb, Teresa, Walt and/or Heather will meet near the end of each month to brainstorm a possible topic for the month • Teresa will monitor
(6) Advanced Training	By August 1, PNB will schedule it	• PNB will do an encore presentation of their 2014 summit training (full

	for the fall (if you haven't done it) By Sept 15, PNB will make a decision about content (i.e., replay of 2014, 2016 presentation, or both) Training to occur by December 31	day) • Time permitting, PNB might pilot the 2016 Summit presentation
(7) Assign annual reports	Reports should be spread out as much as possible over the annual filing cycle so that an employee does not receive all reports at once.	• PCD will handle 240 annuals • Matt will handle 40 annuals • New ELPB attorney will handle 40 annuals • Mark will handle 120 annuals • Grace will handle 80 annuals • Other CD will handle the remainder of reports (approximately 330) • Emory will help certify reports
(8) Handle a nominee	Employees will continue to receive one report per quarter	
(11) Converting to Integrity	Talk to George about typing up OMB reports.	

Pre-Transition Training

Division	Trainee/Presenter	Mentor	Activity 1	Activity 2	Activity 3	Activity 4	Activity 5	Activity 6	Activity 7	Activity 8	Activity 9	Activity 10	Activity 11	Activity 12	Activity 13
ELPB	Ashar, Monica	Heather									9			12	
PNB	Bortot	Keith											11		
PCD	Bunderson, Brandon	Sandy	1	2	3		5	6	7						
CD	Chapman, Douglas	Stephanie		2			5	6	7						
CD	Clark, Grace	n/a					5	6	7						
PCD	Corbally, Steve	Jack		2*	3*		5	6	7						13
ELPB	Dowell, Rachel	TBD									9			12	
PCD	Fishcher, Heidi	Lorna		2	3		5								
ELPB	Francis, Leigh J.	TBD									9			12	
CD	Guzman, Ciara	n/a					5	6	7						
PCD	Hancock, George	n/a													13
PCD	Horton, Elizabeth D.	Sandy	1				5	6	7						
PNB	Jones, Heather	Keith									9		11		
PCD	Kane-Piasecki, Cheryl	n/a										10			
PCD	Kaplan, Kimberly H.	Heather		2		4	5	6		8					
PCD	Khaner, Bradley J.	Jack		2*	3*		5	6	7						13
PNB	Khaner, Megan	Keith									9		11		
PNB	Labedz, Keith	n/a													13
PNB	Mabry, Sandy	Keith									9		11		
PNB	MacDonald, Jack	Keith									9		11		
CD	MaGee, Michelle	n/a							7						
OD	Marinec, Matthew A.	Sandy	1	2	3		5	6	7						
CD	Mathai, Jaideep	Stephanie		2			5	6	7						
PCD	Matis, Jennifer	Sandy	1				5	6	7						
CD	Meyers, David A.	Megan		2	3		5	6	7						
PCD	New Desk Officer	Sandy	1	2	3		5	6	7						
ELPB	New OGC Attorney	Leigh	1	2	3		5	6	7						

Division	Trainee/Presenter	Mentor	Activity 1	Activity 2	Activity 3	Activity 4	Activity 5	Activity 6	Activity 7	Activity 8	Activity 9	Activity 10	Activity 11	Activity 12	Activity 13
CD	New Program Reviewer	Ciara	1						7						
CD	New Program Reviewer	Ciara	1						7						
ELPB	Newton, Elaine	TBD									9			12	
PNB	Nonluecha, Stephanie	Keith									9		11		
PCD	Pond, Wendy	Heather		2		4	5	6		8					
IOD	Rounds, Emory	n/a							7*						
PCD	Ryan's Replacement	Cheryl K.	1				5		7						
ELPB	Salamone, Vincent J.	TBD									9			12	
PCD	Shepherd, Patrick	n/a										10			
ELPB	Sikora Panza, Kimberly	Leigh		2		4	5	6			9				
CD	Skalla, Daniel L.	Megan		2	3		5	6	7						
PCD	Smith, Taurean	George Megan	1										11*		13
PCD	Stein, Nicole	n/a							7						
CD	Stewart, Mark	n/a					5	6	7			10			
ELPB	Swartz, Chris	TBD									9			12	
PNB	Syme, Lorna	Keith									9		11		
CD	Walker, Michelle M.	n/a							7						
PNB	Williamson, Teresa	n/a					5							12	

Corbally, Steve: *Prior to Nov 1*: 5, 6, 7, 13 & *After Nov 1*: 2 *(independent exercises due by Dec 31 instead of Aug 31)*, 3, 5, 6
Khaner, Bradley J. *Prior to Nov 1:* 5, 6, 7, 13 & *After Nov 1*: 2 *(independent exercises due by Dec 31 instead of Aug 31)*, 3, 5, 6
Rounds, Emory: 7 *(Certifying)*
Smith, Taurean: 11 *(working with Megan)*

Activity 1 –

a. The trainee attends basic financial disclosure training presented by Cheryl, Patrick or Mark.

b. By the end of April, the trainee must review the packet of written materials that Deb has prepared and meet with their mentor at least once to review these materials. (Note: The mentor is available generally for any other questions the trainee may have.)

The mentor will provide a 278 exercise. The trainees need to complete the 278 exercise on their own by creating a first set of comments and by looking up the assets. Teresa will schedule a meeting in early May for the trainees to meet as a group (without Sandy) to discuss the exercises prior to the group's next meeting with Sandy.

In May, Sandy will meet with the group, distribute the answer key to the exercises and lead a discussion.

Activity 2 –

a. The trainee attends all nominee meetings. The meetings are generally under 40 minutes. They occur on the 2nd and 4th Thursday of each month. Deb and Heather will stay in the room for another 20 minutes to answer basic questions from any less experienced staff members who want to stay and ask questions.

b. The trainee will complete two (2) independent practice exercises by August 31. Each exercise consists of a draft hypothetical report, a final hypothetical report, an ethics agreement and in some cases an issue key. The exercise starts when the trainee obtains a draft report from the mentor and prepares a set of comments. Then, the trainee obtains the final report from the mentor and compares it to the comments he/she prepared. At that time, the trainee also prepares a draft ethics agreement using the ethics agreement guide. The trainee then obtains the ethics agreement from the mentor and compares it to the ethics agreement he/she prepared. In cases where we have an issue key, the trainee then obtains the issue key from the mentor and reviews it. The trainee schedules a follow-up meeting with their mentor for at least 30 minute to discuss the exercise and ask any questions.

Activity 3 –

a. The mentor receives an assigned report and prepares the first set of comments for the agency. The mentor will be responsible for picking the reports that they will share with the employees

b. The trainee receives the same report, but not the mentor's comments. The trainee prepares the first set of comments for the agency.

c. Where practicable, the trainee will meet with the mentor within two workdays to compare their respective comments before the mentor sends the comments to the agency. Where that is not practicable, the mentor will send his/her comments to the agency and meet with the trainee later (preferably within 1 week). The trainee will be responsible for scheduling meetings and following up promptly with the mentor.

d. This process will be repeated for each round of comments.

e. The trainee will sit in with the mentor on at least one or two significant phone calls for each report, so that the mentor can model our approach to communicating with agency and/or WH officials. The trainee will be responsible for reminding the mentor to include the employee in calls with the agency.

f. The trainee will assist the mentor in assembling the package for preclearance, so that he/she learns the procedures.

g. The trainee will assist the mentor in assembling the final package for certification.

h. The trainee will read the mentor's file notes.

i. The trainee will work with the mentor on at least 2 reports per quarter (March-June, July-Sept, Oct-December).

Activity 4 –
Similar to Activity 3, but the trainee is assigned to do these tasks only as to certain highly complex issues that would not normally arise in connection with the types of reports that the trainee normally handles.

Activity 5 –
PNB staff members will host several "book club" meetings at which they discuss certain OGE advisories, DAEOGrams or other material. The trainee attends at least two of these "book club" session before the end of the year. The trainee must have read the material in advance and should participate actively. (Trainees are encouraged to attend all of them, but must attend two.)

Activity 6 –
The trainee attends one advanced session on Financial Disclosure presented by PNB staff before December 31, 2015. PNB will announce the date of this session and one make-up session.

Activity 7 –
The trainee is assigned several annual reports in 2015.

Activity 8 –
The trainee is assigned as an actual nominee reviewer to review one live report per quarter.

Activity 9 –
The trainee is assigned a regular volume of nominee reports.

Activity 10 –
Conduct basic training on financial disclosure, related issues (e.g., 208(a), exemptions that are often at issue in the review of financial disclosure reports), or training on the use of *Integrity* or the 278e.

Activity 11 –
Gain experience with Integrity by converting our independent study materials from the OGE Form 278 to the Integrity version of the OGE Form 278e.

Activity 12 –
Gain experience with *Integrity* by entering information (using scenarios or reports identified by Deb, Heather, or Keith) from the OGE Form 278 into *Integrity* to produce the *Integrity* version of the OGE Form 278e.

Activity 13 –
Conducting presentations on how to use/navigate *Integrity*.

This is the plan from March 2015 through December 2015. Before January, we will issue a plan for 2016.

Trainee/Presenter	Mentor	Plan
Ashar, Monica	Heather	Activities **9, 12**
Bortot, Deb	Keith	Activities **9, 11**
Bunderson, Brandon	Sandy	Activities **1, 2, 3, 5, 6, 7**
Chapman, Douglas	Stephanie	Activities **2, 5, 6, 7**
Clark, Grace	n/a	Activities **5, 6, 7**
Corbally, Steve	Jack	*Prior to Nov 1:* **5, 6, 7, 13** *After Nov 1:* **2** (independent exercises due by Dec 31 instead of Aug 31)**, 3, 5, 6**
Dowell, Rachel	TBD	Activities **9, 12**
Fischer, Heidi	Lorna	Activities **2, 3, 5**
Francis, Leigh J.	TBD	Activities **9, 12**
Guzman, Ciara	n/a	Activities **5, 6, 7**
Hancock, George	n/a	Activity **13**
Horton, Elizabeth D.	Sandy	Activities **1, 5, 6,** 7
Jones, Heather	Keith	Activities **9, 11**
Kane-Piasecki, Cheryl	n/a	Activity **10**
Kaplan, Kimberley H.	Heather	Activities **2, 4, 5, 6, 8**
Khaner, Bradley J	Jack	*Prior to Nov 1:* **5, 6, 7, 13** *After Nov 1:* **2** (independent exercises due by Dec 31 instead of Aug 31)**, 3, 5, 6**
Khaner, Megan	Keith	Activities **9, 11**
Labedz, Keith	n/a	Activity **13**
Mabry, Sandy	Keith	Activities **9, 11**
MacDonald, Jack	Keith	Activities **9, 11**
MaGee, Michelle	n/a	Activity **7**
Marinec, Matthew A.	Sandy	Activities **1, 2, 3, 5, 6, 7**
Mathai, Jaideep	Stephanie	Activities **2, 5, 6, 7**
Matis, Jennifer	Sandy	Activities **1, 5, 6, 7**
Meyers, David A.	Megan	Activities **2, 3, 5, 6, 7**
New Desk Officer	Sandy	Activities **1, 2, 3, 5, 6, 7**
New OGC attorney	Leigh	Activities **1, 2, 3, 5, 6, 7**
New Program Reviewer	Ciara	Activities **1, 7**
New Program Reviewer	Ciara	Activities **1, 7**
Newton, Elaine	TBD	Activities **9, 12**
Nonluecha, Stephanie	Keith	Activities **9, 11**
Pond, Wendy	Heather	Activities **2, 4, 5, 6, 8**
Rounds, Emory	n/a	Activities **7** (certifying)
Ryan's Replacement	Cheryl K.	Activities **1, 5, 7**
Salamone, Vincent J	TBD	Activities **9, 12**
Shepherd, Patrick	n/a	Activity **10**
Sikora Panza, Kimberly	Leigh	Activities **2, 4, 5, 6, 9**
Skalla, Daniel L.	Megan	Activities **2, 3, 5, 6, 7**
Smith, Taurean	George Megan	Activity **1, 11** (working with Megan)**, 13**
Stein, Nicole	Lorna	Activity **7**
Stewart, Mark	n/a	Activities **5, 6, 7, 10**
Swartz, Chris	TBD	Activities **9, 12**

Syme, Lorna	Keith	Activities **9, 11**
Walker, Michelle M.	n/a	Activity **7**
Williamson, Teresa	Lorna	Activities **8, 12**

Activity 1 –
   a. The trainee attends basic financial disclosure training presented by Cheryl, Patrick or Mark.
   b. By August 31, the trainee must review the packet of written materials that Deb has prepared and has at least one meeting with the mentor to review these materials. (Note: The mentor is available generally for any other questions the trainee may have.)

Activity 2 –
   a. The trainee attends all nominee meetings. The meetings are generally under 40 minutes. They occur on the 2nd and 4th Thursday of each month. Deb and Heather will stay in the room for another 20 minutes to answer basic questions from any less experienced staff members who want to stay and ask questions.
   b. The trainee will complete two (2) independent practice exercises by August 31. Each exercise consists of a draft hypothetical report, a final hypothetical report, an ethics agreement and in some cases an issue key. The exercise starts when the trainee obtains a draft report from the mentor and prepares a set of comments. Then, the trainee obtains the final report from the mentor and compares it to the comments he/she prepared. At that time, the trainee also prepares a draft ethics agreement using the ethics agreement guide. The trainee then obtains the ethics agreement from the mentor and compares it to the ethics agreement he/she prepared. In cases where we have an issue key, the trainee then obtains the issue key from the mentor and reviews it. The trainee then meets with the mentor for at least 30 minutes and discusses the exercise and asks any questions.

Activity 3 –
   a. The mentor receives an assigned report and prepares the first set of comments for the agency.
   b. The trainee receives the same report, but not the mentor's comments.
   c. Where practicable, the trainee will meet with the mentor within two workdays to compare their respective comments before sending the comments to the agency. Where that is not practicable, the mentor will send his/her comments to the agency and meet with the trainee later (preferably within 1 week).
   d. This process will be repeated for each round of comments.
   e. The trainee will sit in with the mentor on at least one or two significant phone calls for each report, so that the mentor can model our approach to communicating with agency and/or WH officials.
   f. The trainee will assist the mentor in assembling the package for preclearance, so that he/she learns the procedures.
   g. The trainee will assist the mentor in assembling the final package for certification.
   h. The trainee will read the mentor's file notes.
   i. The trainee will work with the mentor on at least 2 reports per quarter (March-June, July-Sept, Oct-December).

Activity 4 –
   Similar to Activity 3, but the trainee is assigned to do these tasks only as to certain highly complex issues that would not normally arise in connection with the types of reports that the trainee normally handles.

Activity 5 –

PNB staff members will host several "book club" meetings at which they discuss certain OGE advisories, DAEOGrams or other material. The trainee attends at least two of these "book club" session before the end of the year. The trainee must have read the material in advance and should participate actively. (Trainees are encouraged to attend all of them, but must attend two.)

Activity 6 –

The trainee attends one advanced session on Financial Disclosure presented by PNB staff before December 31, 2015. PNB will announce the date of this session and one make-up session.

Activity 7 –

The trainee is assigned several annual reports in 2015.

Activity 8 –

The trainee is assigned as an actual nominee reviewer to review one live report per quarter.

Activity 9 –

The trainee is assigned a regular volume of nominee reports.

Activity 10 –

Conduct basic training on financial disclosure, related issues (e.g., 208(a), exemptions that are often at issue in the review of financial disclosure reports), or training on the use of *Integrity* or the 278e.

Activity 11 –

Gain experience with Integrity by converting our independent study materials from the OGE Form 278 to the Integrity version of the OGE Form 278e.

Activity 12 –

Gain experience with *Integrity* by entering information (using scenarios or reports identified by Deb, Heather, or Keith) from the OGE Form 278 into *Integrity* to produce the *Integrity* version of the OGE Form 278e.

Activity 13 –

Conducting presentations on how to use/navigate *Integrity*.

PHASE 2, TRAINING TEAM

1. Bunderson, Brandon
2. Corbally, Steve
3. Horton, Elizabeth
4. Lightfoot, Patrick
5. Marinec, Matt
6. Mathai, Jai
7. Skalla, Dan
8. Kaplan, Kim (Item A = required, Item B = optional)
9. Pond, Wendy (Item A = required, Item B = optional)

REQUIREMENTS BETWEEN 2/9/16 and 10/31/16

A. Formal Training Sessions: Attend each session (or watch a recording of it)

TOPIC	TRAINER	WHEN
Selected Financial Interests	Sandy & Megan	February
Executives & Bankers	Lorna	February
Things that hold things	Jack	February
Attorneys	Heather	February
Employee benefit plan exemption	Emory & Patrick Lightfoot	February
Professors	Stephanie	February
Integrity Nominee Functionality	Keith	February
Getting to EIF	Megan	March (make-up date in August)
File notes & extraneous documents	Stephanie	March
Skills refresher: Looking up 1940 Registration and determining sector	Sandy	April
Ethics agreement writing, Part 1	Sandy	April
Ethics agreement writing, Part 2	Deb & Heather	May
Securities exemptions	Heather	May
Schedule C, Part II	Jack	June
Consulting fees & sole proprietorships	Lorna	August

B. **Exercises** *(optional for Kim & Wendy)*

EXERCISE	LEAD	WHEN	
Selected questions from quiz, then discuss at meetings	Heather	5 meetings: March, April, May, June, August (meetings might be combined with formal training sessions, but should do questions in advance)	
One existing hypothetical nominee report exercise	Teresa	Working in teams or alone, complete by April 1; then meet with mentor to discuss	
		Staff	**Mentor**
		Matt & Brandon	Sandy
		Dan & Jai	Jack
		Steve & Elizabeth	Stephanie
		Patrick	Heather
Create one hypothetical report exercise	Megan	Working in pairs (except Patrick), create one hypothetical nominee report exercise by August 1. You should create: • A draft report that has problems • A final report that correctly discloses all items • A bulleted discussion of the issues addressed in your hypothetical report (does not need to be in full narrative text, but must highlight the issues you addressed) The exercise you should be complex enough to show off your knowledge and be useful to future training teams. Get feedback on your draft by the following mentors.	
		Staff	**Mentor**
		Matt & Brandon	Stephanie
		Dan & Jai	Lorna
		Steve & Elizabeth	Jack
		Patrick	Sandy
Tentative: Shadow or review 1 nominee report. *(This activity depends on OGE receiving enough nominee reports. Teresa will make the assignments, so staff members need not feel like it's their responsibility to ask for an assignment.)*	Teresa	Matt	Jack
		Dan	Heather
		Brandon	Lorna
		Jai	Megan
		Steve	Sandy
		Elizabeth	Sandy
		Patrick	Keith

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest in the Executive Branch

Fiscal Year 2016

Explanatory Notes, Annual Performance Plan, and Annual Performance Report

Prepared for the Committee on Appropriations

February 2015

The United States Office of Government Ethics (OGE) provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE's mission directly supports the President's goal of responsibly governing the nation.

Table of Contents

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – 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 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 Principles of Ethical Conduct for Government Officers and Employees is, "[p]ublic service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain." Public servants are expected to make impartial decisions based on the interests of the public when performing their job duties. OGE, in concert with agency ethics practitioners throughout the executive branch, ensures that employees fulfill this great trust.

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; oversees a financial disclosure system that reaches more than 27,000 public and more than 370,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the more than 5,000 ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and provides technical assistance to state, local, and foreign governments and international organizations.

OGE's greatest resource is its multidisciplinary staff of attorneys, ethics and finance experts, and support personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate. As shown in the organizational chart in Figure 1, in addition to the Office of the Director, OGE is divided into four divisions that work in concert to carry out OGE's mission.
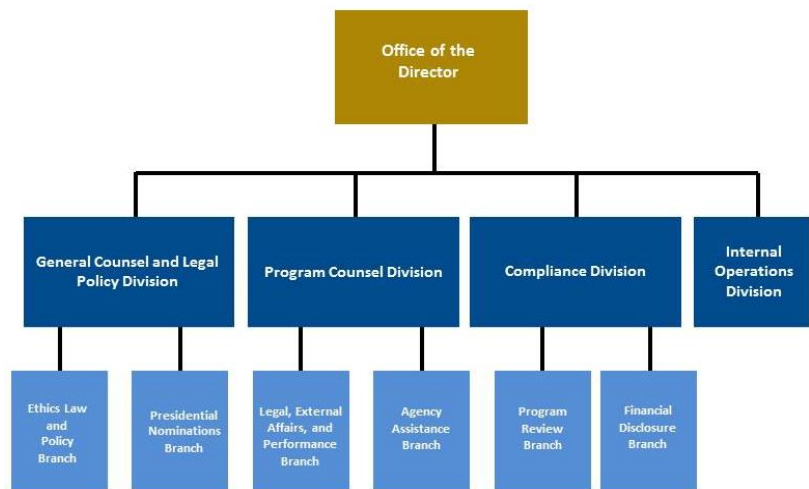

Figure 1: OGE Organizational Chart

Long-Term Strategic Goals

When government decisions are made free from conflicts of interest, the public can have greater confidence in the integrity of executive branch programs and operations. The three strategic goals of OGE's strategic plan for fiscal years 2014 through 2018 – uniformity, continuity, and transparency – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. See Figure 2. OGE's budget priorities for fiscal year 2016 support achievement of these strategic goals.

In order to develop meaningful strategic goals, OGE consulted with internal staff, Congress, executive branch ethics officials, non-governmental organizations, and the general public, and incorporated the feedback received from these groups into the goals. The daily work of OGE is driven by the strategic objectives and performance goals established under each of the overall strategic goals set forth below.

Figure 2: OGE's Fiscal Year 2014 – 2018 Strategic Plan

1. Advance a strong, uniform executive branch ethics program: OGE interprets and advises on ethics laws, policies, and program management issues; holds executive branch agencies accountable for carrying out effective ethics programs; contributes to the professional development of ethics officials; and modernizes and implements the ethics rules and regulations.

2. Contribute to the continuity of senior leadership in the executive branch: OGE provides assistance to the President and the Senate in the nomination process for Presidential appointees requiring Senate confirmation, supports succession planning in executive branch ethics programs, and promotes leadership support of the executive branch ethics program overall.

3. Promote transparency of the executive branch ethics program: OGE raises the visibility of the executive branch ethics program and ensures that ethics information is publicly available to increase public confidence in the integrity of governmental decision making.

Starting on page 6, this document describes the specific work OGE will undertake in fiscal years 2015 and 2016 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward the achievement of its strategic objectives.

Section II – 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 Stop Trading on Congressional Knowledge Act of 2012, 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, $15,742,000."

Budget Request Overview Narrative

OGE requests $15,742,000 for fiscal year 2016 to carry out its mission-critical work. This work includes ensuring the ongoing viability of its new efiling system, *Integrity,* and hiring adequate staff to support its important role in the review of top leaders' financial holdings for conflicts of interest in the Presidential post-election period. This request represents a two percent increase over OGE's fiscal year 2015 enacted level (a less than three percent increase from fiscal year 2014 enacted funding).

At the request level of $15,742,000, OGE expects to be able to invest an additional $150,000 to carry out significant, necessary improvements to *Integrity* and to hire two additional professional staff necessary to support its Presidential nominations work at an estimated cost of $147,000. This funding request level is vital. It will enable OGE to absorb the additional demands of the Presidential election without compromising OGE's ability to perform its other mission-critical functions. These functions include providing guidance, developing rules, and promoting understanding of the ethical standards and conflict of interest laws in executive branch agencies through education programs and compliance reviews.

The additional funding for *Integrity* will enable OGE to finalize an enhanced version of the efiling system prior to the Presidential election. The upgraded version is expected to add important new functionality not included in the initial launch of the system, including system "flags," advanced analytics, and expanded ethics-related data collection and tracking. *Integrity* improves the financial disclosure process, particularly for new filers such as Presidential nominees, because its "wizard" functionality asks filers to answer a variety of questions related to their financial holdings and outside positions and then logically collects the required reporting information based on their responses to these questions. This tailored approach to collecting financial information reduces filer error, as well as eliminates filer confusion that routinely resulted from attempting to follow the complex written instructions associated with the previous paper-based OGE Form 278. *Integrity* also provides for a seamless, paperless review process and increases OGE's access to agency information in support of advancing data-driven, evidenced-based decision making. Funding an enhanced version of *Integrity* also represents OGE's investment in smarter IT delivery executive branch-wide. *Integrity* makes available across the executive branch an effective efiling system at no cost to agencies, thereby minimizing the need for agencies to expend resources on their own systems. This furthers a President's Management Agenda goal of reducing duplication, fragmentation, and overlap. It

also creates the potential for agencies to achieve cost savings that they may redeploy to fund other key ethics mission work. OGE's request would result in this important investment.

In addition to administering an effective efiling system, OGE requires the requested resources to hire and prepare OGE's staff and agency ethics officials across government for their vital role in the Presidential transition. A very significant increase in volume of financial disclosure filings by Presidential nominees requiring Senate confirmation (PAS nominees) will occur in fiscal year 2017 and beyond, following the 2016 Presidential election. When leadership is transferred during a Presidential transition, the nation is vulnerable to a variety of risks, including risks associated with national security and natural disasters. For this reason, the efficient processing of Presidential nominations is critical in order to expeditiously fill vacant positions. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest. Moreover, due to the volume of positions that change during this post-election period, OGE's workload is expected to triple with the election of a new Administration in 2016. OGE's fiscal year 2016 request includes $147,000 to hire two additional professional ethics staff to cross-functionally support these efforts. OGE uses a matrix approach to staffing the nominee report review program, particularly during peak workload periods, to ensure both short-term capacity for its critical PAS nominee work in the post-election period and long-term support for OGE's core mission work. OGE will hire the staff in key mission areas, specifically compliance and agency support, and cross-train the staff. OGE will need the new professional staff on board in 2016 to provide them extensive nominee financial disclosure review training, as well as hands-on experiential learning through assignments of nominee financial disclosure reports.

OGE will also need this full complement of staff resources to support executive branch agency ethics officials in their own preparation for the post-election period. Specifically, OGE will conduct training for nominee financial disclosure reviewers at agencies throughout the executive branch and enhance its programs to provide legal guidance and training to executive branch agencies regarding restrictions on seeking employment and post-government employment activities.

An effective executive branch ethics program helps ensure that government decisions are made free from conflicts of interest, providing the public greater confidence in the integrity of executive branch programs and operations. OGE requires the requested $15,742,000 in order to continue to effectively oversee the executive branch ethics program while absorbing the significant additional workload that will be generated by the upcoming Presidential election.

Budget Object Class Table

A. Budget Request By Object Classification

The object classification table set forth below summarizes OGE's request.

Table: Budget Request by Object Classification in Thousands of Dollars (000's)

	Object Class	2014 Enacted	2015 Enacted	2016 Requested
11.1	Salaries	$8,605	$8,517	$8,747[a]
12.1	Benefits	$2,310	$2,394	$2,450
21.0	Travel	$20	$32	$21
22.0	Transportation (Freight)	$6	$6	$6
23.1	Rental Payments to GSA	$1,691	$1,252	$1,450[b]
23.2	Rental Payments to Others	$0	$0	$0
23.3	Communications and Utilities	$127	$129	$121
24.0	Printing and Reproduction	$11	$10	$65[c]
25.2	Other Services	$2,206	$2,317	$2,715[d]
26.0	Supplies and Materials	$105	$109	$115
31.0	Equipment	$244	$654	$52[e]
99.0	Subtotal	$15,325	$15,420	$15,742
99.0	Reimbursable	$725	$725	$725
99.0	Totals	$16,050	$16,145	$16,467

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[a] Supports hiring two additional professional staff to support OGE's vital role in the review of top leaders' financial holdings in the Presidential post-election period and OGE's other mission-critical work.

[b] Reflects GSA-mandated reduction in OGE office square footage and the terms of the new 10-year lease signed in fiscal year 2014.

[c] Reflects actual Government Printing Office costs after reviewing historical expenses; also includes necessary increases in printing and reproduction of training and reference materials for OGE's role in the 2016 Presidential transition.

[d] Supports the development and launch of a revised version of *Integrity*, OGE's executive branch-wide electronic public financial disclosure system mandated by the STOCK Act.

[e] Reflects complete, successful replacement of agency-wide information technology equipment, including network servers, updated phone system, and HVAC system during fiscal years 2014 and 2015 resulting in significant reduction of funding necessary for equipment in fiscal year 2016. Increased funding necessary to maintain and support the equipment is reflected in Object Class 2500 and 2600.

Section III – Fiscal Year 2014 Performance Report and Fiscal Year 2015 and 2016 Performance Plan

OGE's past and planned work reflects its commitment to fulfilling the vital governmental need of preventing conflicts of interest in the federal executive branch. 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 its progress on its performance goals.

Organized by strategic goal and objective, this section highlights both OGE's major accomplishments and progress toward achieving its strategic objectives in fiscal year 2014 as measured by its performance goals.[1] This section also describes OGE's planned work for fiscal years 2015 and 2016. Information on how OGE will measure its progress toward achieving its strategic goals in fiscal year 2016 can be found in Appendix A.

Strategic Goal 1: Advance a strong, uniform executive branch ethics program

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE has identified four strategic objectives. These objectives are: (1.1) interpreting and advising on ethics laws, policies, and program management; (1.2) holding executive branch agencies accountable for carrying out an effective ethics program; (1.3) contributing to the professional development of ethics officials; and (1.4) modernizing and implementing the ethics rules and regulations.

Strategic Objective 1.1: Interpret and advise on ethics laws, policies, and program management

A uniform legal framework ensures that all executive branch employees are held to the same standards. Through interpreting and advising on the ethics laws, rules and policies, OGE assists agency ethics officials in providing consistent and accurate counseling to their employees in order to prevent or remedy conflicts of interest.

Performance Highlights

Assisted and supported agency ethics officials through OGE's Desk Officer program

OGE is the supervising ethics office for a decentralized ethics community comprised of thousands of ethics officials in over 130 agencies across the executive branch. OGE's Desk Officer program serves as a vital communications link to this ethics community. OGE's Desk Officers provide agencies with assistance in resolving difficult ethics issues requiring expertise that only the supervising ethics office can offer. In fiscal year 2014, OGE Desk Officers

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[1] The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual ethics program questionnaire, Google Analytics, and an annual survey of ethics officials to assess satisfaction with OGE services and products.

responded to over 1,843 requests for assistance. They also proactively addressed the real-time needs of agency ethics officials. For example, when the government reopened following the closure due to a lapse in appropriations early in fiscal year 2014, OGE Desk Officers proactively contacted their assigned agencies to provide guidance on specific ethics issues related to the shutdown and reopening.

In order to augment OGE's assistance to agency ethics officials and strengthen relationships with them, OGE Desk Officers visited 41 agency ethics offices in fiscal year 2014. These onsite visits served to increase agency ethics officials' awareness of the availability of OGE's services. They also bolstered agency officials' confidence in the Desk Officers' expertise, thereby encouraging agencies to make full use of the services that OGE offers.

Also in fiscal year 2014, OGE continued to leverage technology and data to enhance the effectiveness of the Desk Officer program and OGE's support to agencies. Specifically, OGE used its Agency Information Management System (AIMS) to identify trends and emerging issues in government ethics. AIMS enabled OGE to track its external interactions based on the substance, complexity and type of questions OGE received from agencies and other stakeholders, such as the public, the media, and Congress. OGE's analysis of this data shaped its guidance and education efforts. For example, OGE determined that a high percentage of the complex questions it received related to 18 U.S.C. § 205, a criminal conflict of interest statute barring government employees from certain representational activities involving the United States. In response to this data, OGE added a session to its September 2014 National Government Ethics Summit that provided an in-depth review and discussion of the statute. Based on feedback from the session, 94 percent of surveyed ethics officials improved their understanding of and were better able to provide their agency's employees with quality advice on this criminal law.

Performance Goal: OGE used direct input from the government ethics community to measure the performance of its Desk Officer program in fiscal year 2014. OGE surveyed ethics officials who had requested assistance from OGE's Desk Officers during the fiscal year. Approximately 93 percent of survey respondents indicated that Desk Officers helped them to perform their job duties. Figure 3 shows that OGE exceeded its target.

% of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties

	2014
☐ Target	80%
■ Actual	93%
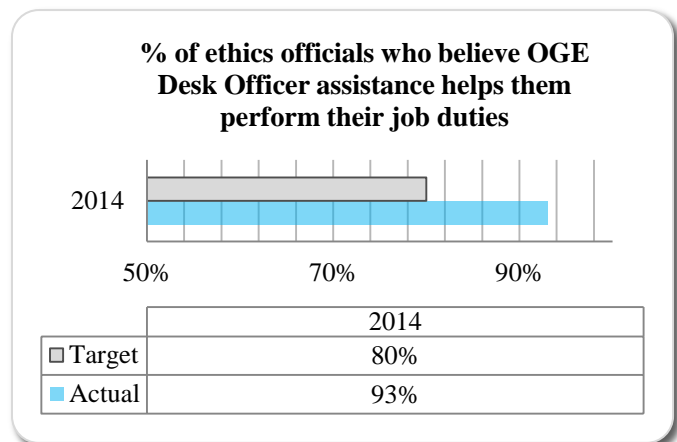
Figure 3: Desk Officer Assistance

Provided agencies with important legal and program guidance

In addition to providing day-to-day assistance through the Desk Officer program, OGE issues advisories to disseminate critical information to the executive branch ethics community and to promote uniform, consistent interpretation of ethics laws, regulations, and policies. The advisories are an integral component of the body of interpretive and programmatic guidance that executive branch ethics officials rely on daily.

In fiscal year 2014, OGE issued eight [advisories](#) covering applicability of ethics laws and regulations during furlough periods, participation in initial public offerings by certain federal employees, waivers of financial conflicts of interest, statutory pay thresholds for public financial disclosure, procedures for financial disclosure, agency component designations pertaining to revolving door restrictions, OGE's annual survey of criminal conflict of interest prosecutions, and amendments to the widely attended gathering gift exception for gifts of free attendance.

In fiscal year 2014, OGE modified its process for developing advisories on legal issues in order to leverage the expertise of the ethics community. OGE initiated consultations with key members of the ethics community to solicit their views on the subjects of planned advisories and to obtain their feedback on drafts of advisories. OGE convened focus groups to discuss the subjects addressed in several of the advisories it issued this year and circulated drafts of the advisories to ethics officials with the greatest experience in the matters addressed in the advisories. With this community input, OGE has increased its ability to effectively address current issues confronting executive branch ethics officials.

Leveraged technology to disseminate information widely

To strengthen OGE's relationship with the ethics community and to further ensure that ethics officials have access to the most up-to-date ethics resources, OGE continued to expand its efforts to timely disseminate information to the ethics community. OGE used the MAX.gov platform, a government-wide collaboration, data collection, and information sharing site, to provide relevant and timely information to ethics officials. Through MAX.gov, OGE provided advance notice of upcoming OGE guidance and events, as well as updates on relevant ethics-related legislative proposals. In addition, OGE used an ethics email listserv and its website to provide information to the ethics community.

Performance Goal: In fiscal year 2014, OGE created a new performance goal to determine if its advisories assist ethics officials in performing their jobs. An OGE survey of the ethics community found that 87 percent of respondents felt that advisories help them perform their job duties. Analytics of OGE's website also show that the legal advisories page was the third most viewed page of OGE's website.

Engaged ethics officials to share information and shape policy

In fiscal year 2014, OGE increased its engagement with the ethics community to address new and ongoing ethics issues. To support this effort, OGE organized numerous meetings, conference calls, focus groups, and webinars with senior executive branch ethics officials. These events helped strengthen OGE's relationships with the individuals who carry out the executive branch ethics program. They also provided opportunities for ethics officials to engage with OGE on a variety of topics of interest, to share with OGE lessons learned from their experiences practicing in the field, and to learn from one another.

For example, OGE's Director held quarterly meetings for groups of as many as 100 agency ethics officials. At these meetings, OGE's senior leaders shared information critical to managing an effective ethics program, encouraged discussion of current ethics issues facing

the executive branch, and consulted with agency ethics officials regarding contemplated changes in OGE's policies. For their part, agency ethics officials attending these meetings shared with OGE information about their priorities and needs, which led OGE to adjust various activities in order to provide more effective support to the executive branch ethics community. In response to OGE's annual survey of ethics officials, 96 percent of surveyed ethics officials indicated that they felt more informed as a result of attending the quarterly meetings.

OGE also held meetings of targeted groups of ethics officials to address emerging ethics issues. For example, OGE held a meeting for Designated Agency Ethics Officials (DAEOs) of large agencies who were encountering challenges in addressing compliance with the periodic transaction reporting requirement under the Stop Trading on Congressional Knowledge Act (STOCK Act). Meeting participants collaborated to develop practical approaches to implementing the STOCK Act requirement in order to foster consistent, timely compliance by covered filers. OGE held a similar meeting to address an increased volume of agency inquiries about requirements for compliance with ethics agreements through the establishment of screening arrangements. As a result of that meeting, OGE incorporated feedback from agency ethics officials into a legal advisory updating previous OGE guidance on the use of screening arrangements to comply with ethics agreements.

Performance Goal: Figure 4 shows that OGE did not reach its target goal for the percentage of ethics officials who believe OGE timely addresses new ethics issues. This may be a result of OGE broadening its focus to the question of whether ethics officials believe OGE is timely communicating on all issues, not just new or emerging issues. OGE found that 94 percent of respondents to the Annual Survey of Ethics Officials believe OGE timely communicates ethics-related information.
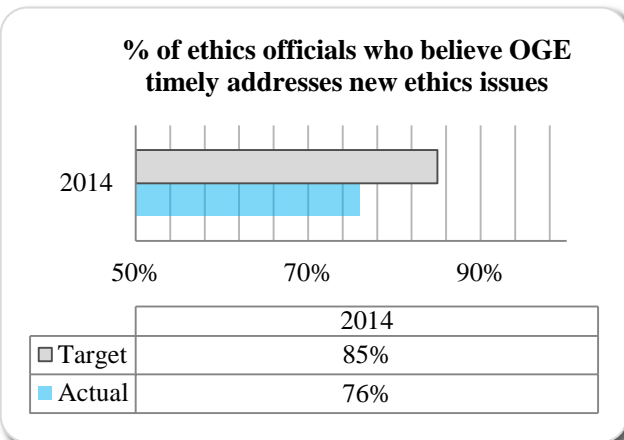
% of ethics officials who believe OGE timely addresses new ethics issues

	2014
☐ Target	85%
☐ Actual	76%

Figure 4: Timely Address New Ethics Issues

Assisted other key stakeholders

In addition to assisting executive branch ethics officials, OGE responded to requests for assistance from key stakeholders. One such important OGE stakeholder is Congress. OGE serves as the legislative liaison on behalf of the entire executive branch ethics program. As such, OGE helps to build congressional understanding of the executive branch ethics program, which in turn, serves to inform congressional oversight and any future revisions to ethics laws. Notably, OGE responded to nearly 20 congressional requests for detailed, technical assistance on executive branch ethics issues and draft legislation on topics including the STOCK Act and its amendments, financial disclosure reporting requirements, gifts, and misuse of government positions and resources. Additionally, OGE provided requested support to the Government Accountability Office on two of its substantive reviews, both of which required OGE's expertise regarding the application of the executive branch ethics rules. OGE also represented the executive branch ethics community by providing ethics expertise on 38 requests for comments

on legislative materials and 36 requests for comments on Executive Orders and Presidential Memoranda from the Office of Management and Budget (OMB) through the Legislative Referral Memorandum (LRM) process. OGE timely responded to 100 percent of the LRM requests it received.

OGE also provides substantive assistance to outside entities such as associations, non-governmental organizations, attorneys, and private enterprises that interact with executive branch agencies and employees. For example, in fiscal year 2014, OGE notified a private sector company and the ethics officials of targeted agencies that the company's government employee discount program implicated ethics rules that prohibit employee from accepting certain gifts from outside sources. This type of assistance helps promote understanding of the ethics rules to prevent inadvertent violations.

<u>Planned Work for Fiscal Years 2015 and 2016</u>

In fiscal years 2015 and 2016, OGE will continue to provide quality Desk Officer services, timely legal and programmatic guidance, and effective assistance to key stakeholders. OGE will also continue to leverage technology to share information and to create opportunities to engage with the ethics community. Key highlights of OGE's planned work are described below.

Assist and support agency ethics officials through OGE's Desk Officer program

OGE Desk Officers will continue to meet personally with agency ethics officials in order to strengthen their professional relationships. Desk Officers also will continue to provide timely, expert advice in applying the ethics laws and regulations and the most up-to-date ethics information. OGE will use AIMS to become even more data driven in its decision making and to maximize the reach of its limited resources. For example, OGE will use AIMS data to identify particular groups of agency ethics officials that may require targeted ethics training, guidance, or other support services.

Provide timely legal and program guidance

Providing timely legal guidance is necessary to keep ethics officials up to date on current ethics issues and changes in ethics law and policy. In addition to publishing legal advisories as new ethics issues arise, OGE plans to issue a legal advisory that discusses implications of the legislative activity during the 113th Congress that is of relevance to the executive branch ethics program. OGE also plans to issue legal advisories related to the upcoming Presidential transition, with an emphasis on the post-government employment rules. Through written guidance, in-person meetings, social media, MAX.gov, and its website, OGE will also provide direction on program management issues, such as ethics program administration and financial disclosure.

Engage ethics officials and other external stakeholders to share information and shape policy

Leveraging technology via the MAX.gov shared platform, OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date ethics information.

Specifically, OGE will use MAX.gov to provide updates and responses to frequently asked questions about *Integrity*, OGE's electronic public financial disclosure report filing system. OGE will also continue using MAX.gov to provide agencies with advance notice of upcoming OGE guidance and events as well as updates on relevant legislative proposals. In addition, OGE will continue to post advisories and other guidance in a searchable format on its website and will provide notice of new guidance via its listserv and MAX.gov.

OGE will continue to hold quarterly meetings with senior agency ethics officials. OGE will also organize additional meetings and conference calls to share information relevant to managing an effective ethics program, to discuss current ethics issues facing the executive branch, and to obtain information from stakeholders in the government ethics community.

Overall, OGE will continue to expand its efforts to consult with agency ethics officials, non-governmental organizations, academic experts, and other stakeholders when developing new policy. Specifically, OGE will continue its practice of seeking input from the ethics community as a part of the process of drafting its legal advisories. OGE will also continue to provide advice and assistance in response to requests from a variety of stakeholders in addition to those in the executive branch ethics community, such as Congress, professional associations, non-governmental organizations, academia, state and local governments, and employee groups, to build a better understanding of the executive branch ethics program.

Strategic Objective 1.2: Hold executive branch agencies accountable for carrying out an effective ethics program

In performing its oversight function, OGE ensures that executive branch agencies are held accountable for carrying out effective ethics programs. Through its program review, data collection, and financial disclosure review activities, OGE evaluates the processes and systems in place at the agency level to ensure consistent and successful ethics program management.

Performance Highlights

Reviewed agency ethics programs for compliance

Through ethics program reviews — plenary reviews and inspections — OGE evaluates agency ethics programs. Where necessary, OGE provides recommendations for program improvement and suggests remedial actions to correct deficiencies. Evaluating agency ethics programs and following up on agency implementation of review recommendations helps to hold agency leadership accountable for administering compliant ethics programs. In fiscal year 2014, OGE conducted 24 reviews and published a total of 12 reports. OGE also conducted seven follow-up reviews and published six of the related reports.

> *"In closing, I note that we found the Review to be very beneficial and the OGE personnel who worked on it to be of the highest caliber of public servant, judicious and extremely helpful."*
>
> - *Agency head*

Implemented new inspection methodology

This year, OGE expanded the reach of its oversight function by supplementing plenary reviews with inspections. Inspections are targeted examinations of key elements of an agency's ethics program that are designed to identify systemic risks. As with plenary reviews, inspections often lead to constructive recommendations from OGE for mitigating program vulnerabilities. OGE will continue to conduct traditional plenary reviews. Inspections are an additional method of review that enables OGE to expand the reach of its resources to agencies it might not be able to assess through a plenary review in a given year. Because inspections focus on select program elements, adding inspections to the tools available to OGE has increased the number of agencies its staff can evaluate. Moreover, if an inspection of an agency generates data suggesting potential systemic risks, OGE may schedule the agency for a more expansive plenary review to evaluate its compliance. The expanded capacity provided by the inspection process increases OGE's onsite presence at federal agencies and, as a consequence, increases OGE's capacity to detect systemic risks before problems arise. In fiscal year 2014, OGE conducted 15 inspections, published eight inspection reports, and began drafting seven more reports.

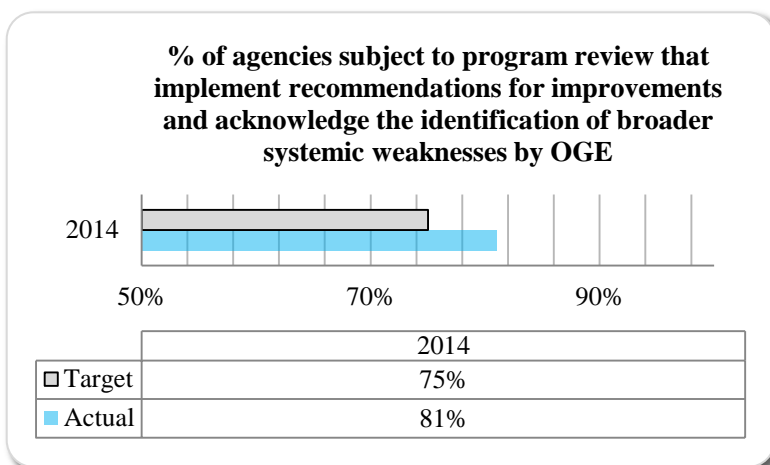*Conducted ethics program reviews*

Plenary reviews of agency ethics programs continued to be an important component of OGE's statutorily-mandated oversight activities. In fiscal year 2014, OGE conducted nine plenary reviews, published four reports, and began drafting eight more reports. OGE also conducted seven follow-up reviews and issued reports on six of those follow-up reviews. Notable among OGE's achievements in fiscal year 2014 was its increased oversight of ethics programs at a number of micro agencies. Micro agencies tend to be staffed with ethics officials who have limited time to devote to ethics-related responsibilities. By conducting program reviews of nine of these agencies in 2014, OGE was able to assess their level of compliance, assist them in correcting a number of significant deficiencies, and support them in administering effective ethics programs.

Issued recommendations to improve compliance

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation. Recommendations direct the agency to take actions necessary to correct the deficiency. In fiscal year 2014, OGE issued 58 recommendations through program reviews, both plenary reviews and inspections. For example, during a review of an agency's ethics program, OGE identified that only 87 percent of the sample of confidential reports it examined were certified timely and recommended that the agency improve the certification timeliness of confidential reports. To address this recommendation, the agency put in place a policy to alert certifiers weekly of reports that are ready for certification. As a result of this new policy, OGE found that 100 percent of a sample of confidential reports it examined during its follow-up review of the agency were certified timely. In another instance, OGE discovered that an agency was not in compliance with financial disclosure requirements. OGE issued a recommendation to the agency to collect, review, and certify reports from members of the agency's board of directors. As a result, agency ethics officials collected the reports and were

able to review board members' financial interests to ensure they could perform their duties free of conflicts of interest.

Performance Goal: OGE exceeded its target for the percent of agencies subject to program review that implemented recommendations for improvements and acknowledged the identification of broader systemic weaknesses.

% of agencies subject to program review that implement recommendations for improvements and acknowledge the identification of broader systemic weaknesses by OGE

	2014
☐ Target	75%
■ Actual	81%

Figure 5: Program Review Recommendations

Improved programs by sharing model practices

In addition to identifying ethics program deficiencies or vulnerabilities, program reviews also provide the opportunity for OGE to identify model practices that agencies have instituted to manage their ethics programs. OGE shares these model practices with other agencies to use as tools for enhancing their programs.

Analyzed program data collected from executive branch agencies

The Ethics in Government Act of 1978 requires agencies to submit to OGE information concerning certain important aspects of their programs. Agency responses to OGE information requests give OGE a snapshot view of each agency's ethics program, and the compiled data provides OGE with an overview of the entire executive branch ethics program. In fiscal year 2014, OGE collected data from each of the more than 130 executive branch agencies by administering its Annual Agency Ethics Program Questionnaire (Annual Questionnaire). OGE used the aggregate data to respond to requests about the executive branch ethics program from Congress and other stakeholders, to shape OGE's priorities, and to identify common practices used to effectively implement an agency ethics program. For example, in fiscal year 2014, OGE ascertained from questionnaire responses that 40 percent of the highest level ethics officials are currently eligible to retire. As a result, OGE plans to direct more resources toward supporting succession planning in the executive branch ethics program. See page 32. In addition, OGE reviewed agencies' questionnaire responses to increase its understanding of each ethics program and to identify any compliance concerns that might prompt an inspection or plenary review.

Published key data highlights regarding executive branch ethics program

For the first time, in fiscal year 2014 OGE shared key highlights from its Annual Questionnaire with ethics officials on the MAX.gov site and at the National Government Ethics Summit. Providing this data allowed ethics officials to compare aspects of their programs with other agencies, including how best to allocate ethics program resources. In addition, to help the public gain a better understanding of the scope and impact of the executive branch ethics

program, OGE published on its website a document containing key statistics about the executive branch-wide ethics program.

Improved data collection

Because OGE is using data from the Annual Questionnaire to inform its decisions and is more widely disseminating the data, OGE is committed to improving the quality and validity of the data it collects. In support of this effort, OGE held focus groups of ethics officials to enlist them in refining the questionnaire. Specifically, OGE sought feedback to eliminate ambiguity in the questions asked and to identify information that could be of use to OGE and to the ethics community. Based on the comments received, OGE updated the Annual Questionnaire to improve the quality and validity of the data collected. OGE issued this improved Annual Questionnaire in January 2015.
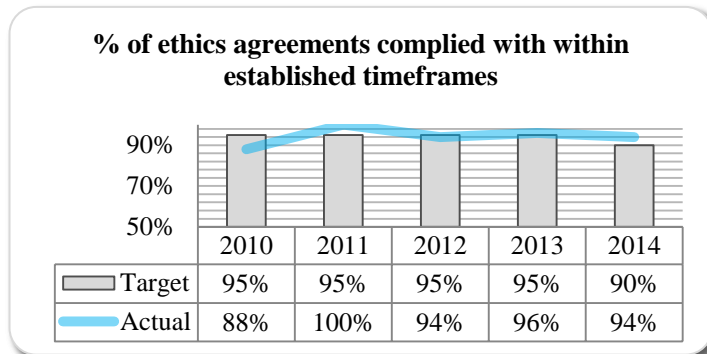
Published its annual report on the administration of the President's Ethics Pledge

To further ensure that Presidentially-appointed, Senate-confirmed (PAS) officials are free of conflicts of interest, OGE surveyed agencies in fiscal year 2014 regarding their administration of the President's Executive Order on Ethics Commitments by Executive Branch Personnel (Executive Order 13490) and issued its fifth annual report on agencies' administration of the Order. This report provides valuable insight into the administration of the Ethics Pledge required by the Order. The report includes, among other things, information about waivers of the Ethics Pledge's requirements and the percentage of PAS officials required to sign the Ethics Pledge who have done so. OGE found that during calendar year 2013, agencies successfully administered the Ethics Pledge and that all PAS officials required to sign the Ethics Pledge in 2013 had done so. OGE provided a copy of the report to Congress and made it available to the public via its website and Twitter account.

Monitored agency leaders' compliance with their ethics agreements

OGE works to ensure that executive branch leaders who are PAS officials remain free of conflicts of interest after taking office. OGE identifies and resolves potential conflicts of interest on the part of Presidential nominees by establishing written ethics agreements with them prior to confirmation. OGE then monitors their compliance with their ethics agreements through the collection and review of documentation provided by agency ethics officials.
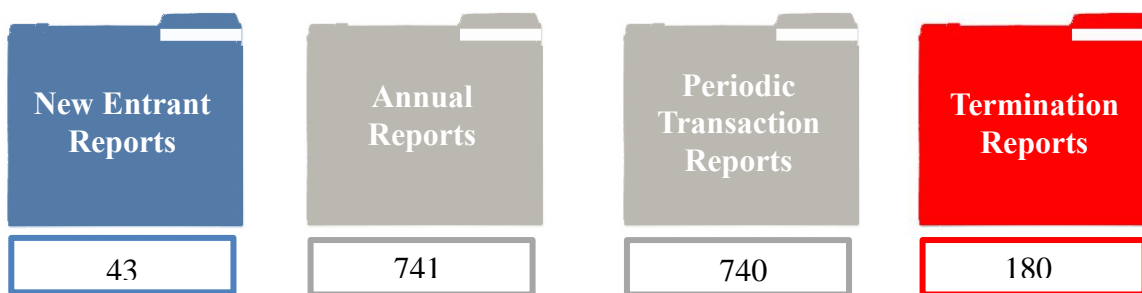
Performance Goal: In fiscal year 2014, 152 PAS appointees were subject to deadlines for documented compliance with their ethics agreements. Agency ethics officials reported that 94 percent of these appointees complied with their ethics agreements within required timeframes.

% of ethics agreements complied with within established timeframes

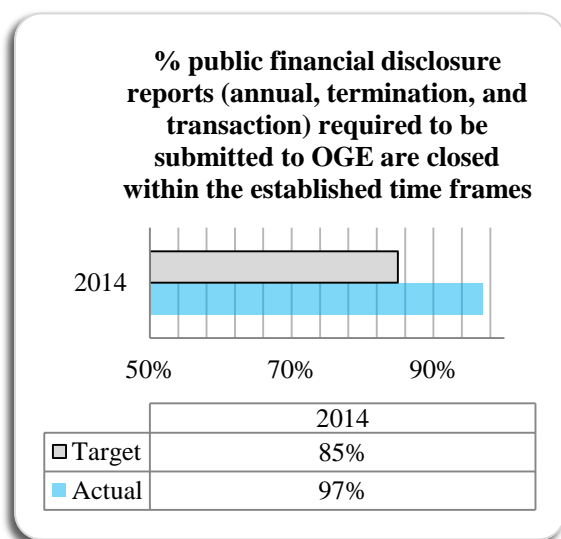|	2010	2011	2012	2013	2014
Target	95%	95%	95%	95%	90%
Actual	88%	100%	94%	96%	94%

Figure 6: Ethics Agreement Compliance

14

Reviewed the public financial disclosure reports of top officials

OGE also reviews the annual, termination, and transaction reports of PAS officials, as well as new entrant and other reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. The timely review of these reports helps ensure that these senior officials remain free from conflicts of interest. In fiscal year 2014, OGE reviewed over 900 public financial disclosure reports. Additionally, OGE reviewed over 700 periodic transaction reports. Notably, for the second year in a row OGE continued to complete its reviews more efficiently than in previous years. In fiscal year 2014, the average number of days between the receipt of a report and its certification was 19 days, four days less than fiscal year 2013 and 62 days less than fiscal year 2012.

New Entrant Reports	Annual Reports	Periodic Transaction Reports	Termination Reports
43	741	740	180

Figure 7: Number of Financial Disclosure Reports Reviewed by OGE, by Type

% public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within the established time frames

	2014
☐ Target	85%
▣ Actual	97%

Figure 8: OGE Review of Financial Disclosure Reports

Performance Goal: In fiscal year 2014, OGE received 17 percent more reports than in the prior year. This overall increase was attributed to an increase in the number of periodic transaction reports filed pursuant to the STOCK Act. Despite this increase in volume, OGE exceeded its target of completing reviews of public financial disclosure reports, including new entrant, annual, termination, and transaction reports required to be submitted to OGE within 60 days of receipt. OGE has created new procedures and has devoted significant resources toward this performance goal since 2012. In fiscal year 2012, OGE completed 54 percent of its reviews within the 60 days of receipt compared to 90 percent in fiscal year 2013 and 97 percent in fiscal year 2014.

Responded to agency requests to tailor their financial disclosure programs

OGE supports agencies' accountability for their ethics programs by analyzing and responding to agency requests to exclude certain positions from public financial disclosure requirements. These positions must be of a confidential nature and have no policy-making role. OGE also evaluates agency proposals for alternative confidential financial disclosure procedures to ensure that they will enable the agency to more readily identify and remedy potential conflicts

of interest among their employees. In fiscal year 2014, OGE reviewed and signed 33 determinations under 5 C.F.R. section 2634.203(b) for Schedule C employees requesting exclusions from the public financial disclosure requirements of title I of the Ethics in Government Act of 1978. OGE also reviewed and approved one agency request to modify an existing alternative financial disclosure procedure.

Supported the Inspector General community through advice, training, and collaboration

OGE provides advice and training to Inspectors General (IGs). In fiscal year 2014, OGE provided direct support to 10 IG investigators and federal prosecutors who requested assistance with the interpretation and application of federal conflict of interest laws and ethics rules. In addition, OGE instructors provided training to 75 attendees at the Inspector General Criminal Investigation Academy, focusing on investigating ethics-related matters and working with ethics officials. This particular training has become a standard part of the Academy's curriculum and complements a web-based training module OGE developed for IG investigators. OGE also presented on optimizing the relationship between IGs and ethics officials at the 2014 Council of the Inspectors General on Integrity and Efficiency (CIGIE) annual conference to approximately 100 attendees. This advice and training leads to more effective IG investigations of potential ethical wrongdoing by agency employees, and thereby results in employees being held accountable for adhering to the ethics rules.

OGE's Director is a standing member of CIGIE. In fiscal year 2014, OGE leadership actively participated as a member of CIGIE and its Integrity Committee, which examines allegations of misconduct against IGs and their direct reports. As a member of CIGIE, OGE assists IGs and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations, as well as how an effective ethics program supports enforcement.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to conduct reviews of agency ethics programs, gather data about each agency and the overall executive branch ethics program, monitor agency leaders' compliance with their ethics agreements, review senior officials' financial disclosure reports, and support the IG community. Key highlights of OGE's planned work are described below.

Conduct program reviews

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable requirements throughout the executive branch, OGE's Director has prioritized increasing OGE's review of agency ethics programs. As a result, OGE plans to conduct a program review of every agency in the executive branch at least once between January 2014 and January 2018.

In fiscal years 2015 and 2016, OGE will work toward achieving this priority through a combination of plenary reviews and inspections. Generally, OGE will conduct plenary reviews at

Cabinet-level departments and at the largest executive branch agencies, while inspections will largely be limited to the smaller agencies. However, as noted above, the inspection process also serves as a risk management tool by allowing OGE to assess whether an agency requires a full plenary review. If an inspection identifies systemic risks in an agency's ethics program, OGE will conduct a plenary review to more fully evaluate the program. This process ensures that program weaknesses and deficiencies are identified and corrected so that the associated risks to the agency are mitigated.

One mechanism by which program reviews currently enhance the executive branch ethics program is through the identification and sharing of model practices that agencies have implemented to effectively manage their programs. In fiscal years 2015 and 2016, OGE will continue to use the program review process to identify model practices and will increase its efforts to share these practices with the executive branch ethics community. By sharing innovative methods already in place at certain agencies, OGE can leverage the access afforded by the program review process to improve the executive branch program as a whole.

Conduct surveys to collect compliance data

In fiscal years 2015 and 2016, OGE will continue collecting and analyzing information about the executive branch ethics program. OGE will develop a new electronic application for collecting the Annual Questionnaire data. This application will make the data collection more efficient by using a platform described on page 45, and will improve OGE's ability to analyze the data. OGE will use the information collected through responses to the Annual Questionnaire to evaluate the executive branch ethics program. OGE also plans to use the data to identify trends, best practices, and any challenges the ethics program is facing. OGE will continue to share information from the Annual Questionnaire with the ethics community and the public on its website. In addition, OGE will continue to implement Executive Order 13490. OGE will conduct an executive branch-wide survey to gather data on compliance with the Order and will publish the results on OGE's website in the sixth annual report to the President on agency compliance with the Order.

Monitor compliance with commitments made by incoming agency leaders to resolve conflicts of interest

OGE will continue working 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. In 2015 and 2016, OGE will continue to monitor the timely compliance by PAS officials with the commitments in their ethics agreements. OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that these reports are timely filed, accurately completed, and thoroughly reviewed by agency ethics officials for potential conflicts of interest.

Support the vital work of Inspectors General

To support the work of Inspectors General in holding agency employees accountable for abiding by the conflict of interest laws, OGE will continue providing Inspectors General with

guidance on the interpretation and application of the conflict of interest laws and ethics rules in fiscal years 2015 and 2016. In addition, OGE leadership will regularly attend meetings of the Council of Inspectors General on Integrity and Efficiency. OGE staff will also continue to provide training as part of the Inspector General Academy's Public Corruption Investigations Training Program.

Strategic Objective 1.3: Contribute to the professional development of ethics officials

For the past two years, OGE has prioritized work on its strategic objective of contributing to the professional development of ethics officials. OGE is committed to educating executive branch ethics officials and federal employees on the conflicts of interest laws and ethics regulations. OGE's team of professional staff and attorneys has worked diligently to promote continuous learning, thereby increasing the overall skill of the executive branch's corps of professional agency ethics officials. In turn, OGE leverages these agency ethics officials to train the broader federal workforce regarding their ethical responsibilities. In fiscal year 2013, OGE increased registrations for its educational offerings by 238 percent over the previous year. In fiscal year 2014, OGE increased registrations beyond even the 2013 result by an additional 27 percent. When the offerings at the 2014 National Government Ethics Summit are also included, the percentage increase over fiscal year 2013 becomes a 37 percent increase. Not only is the quantity of OGE training noteworthy, so is the quality. As discussed below, the overwhelming majority of registrants for OGE's educational offerings rated the quality of the offerings very highly.

In consultation with OMB, OGE has determined that performance toward this objective is making noteworthy progress.

Performance Highlights

OGE's success in leading the decentralized executive branch ethics program relies greatly on an informed community of ethics officials. In fiscal year 2014, OGE provided an array of educational opportunities to ensure that ethics officials had access to the expertise and tools they needed to do their jobs. Leveraging technology and existing resources, OGE was able to provide these opportunities to agencies either free of charge or for a low cost.

Developed effective training products

OGE developed effective educational products to contribute to the professional development of ethics officials and to support their training and counseling of agency employees. Specifically, OGE assisted ethics officials in developing and sharing products for annual training for their agencies' employees. Through the creation of the OGE Institute for Ethics in Government (IEG) store located on MAX.gov, OGE made available to the community a variety of educational course materials, practical job aids, and reference guides created to assist ethics officials in the day-to-day operations of their programs. Through the IEG store, OGE also provides a repository where the community can share similar products the community itself has created, including materials to assist with annual employee ethics training. The IEG store is an efficient way for agency ethics officials to browse educational materials and identify those that

are most pertinent to their particular needs. All of the educational materials located in the store are available free of charge.

To further encourage the creation and sharing of educational and practical job-related products, OGE partnered with the Pension Benefit Guaranty Corporation in fiscal year 2014 to host a one-day symposium for ethics officials to develop products to share with the community. The 55 registered attendees at the workshop created 16 separate, unique products, including short videos, job aids, reference guides, presentation slide decks, and course materials. These products were then presented to the community through a virtual symposium attended by more than 150 officials. Afterward, OGE posted the products created in the IEG Store so that the rest of the ethics community could immediately benefit from their peers' creative training efforts.

In addition to the products available in the IEG Store, OGE makes available all of the video and audio recordings of the distance learning events OGE sponsors, as well as the informational slide decks, job aids, and reference materials created to support those events, on-demand through MAX.gov.

Performance Goal: The results from the Annual Survey of Ethics Officials show that OGE met its target for the percentage of ethics officials who use training products made available by OGE.
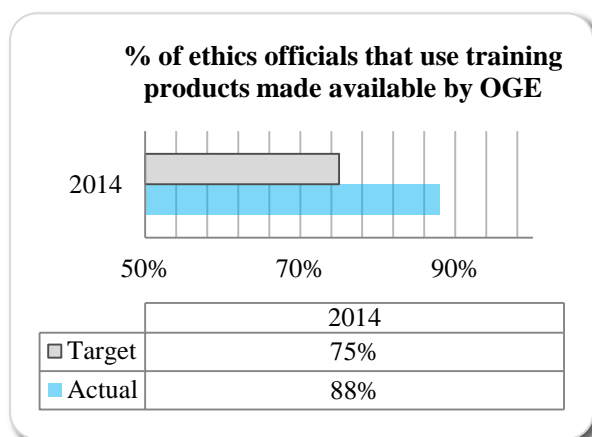
% of ethics officials that use training products made available by OGE

	2014
☐ Target	75%
■ Actual	88%

Figure 9: Ethics Training Products

Held twice-annual symposia for ethics practitioners

OGE periodically offers symposia, which are events that allow large groups of ethics officials to receive training and collaborate with other ethics professionals. Symposia bolster community building between OGE and executive branch ethics officials, as well as increase the knowledge and skills of ethics professionals. In fiscal year 2014, OGE held 2 symposia: the training products symposium described above and its first National Government Ethics Summit for hundreds of ethics practitioners as described below.

Held OGE's first National Government Ethics Summit, an innovative solution to costly training conferences

In September 2014, OGE held the first National Government Ethics Summit, a low-cost, multi-day training event for over 400 attendees. The Summit, which OGE held in lieu of the traditional conference that it has presented regularly since 1980, brought together executive branch ethics officials and external stakeholders. The external stakeholders included ethics officials from the other branches of the federal government, ethics officials from state and local governments, staff from various offices of Inspectors General, members of the press, advocates from good government groups, and noted thinkers from academia. OGE designed the Summit to strengthen the executive branch ethics program by providing attendees with opportunities to

deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections with ethics officials who can assist in resolving even the most complex ethics issues.

The Summit consisted of seven days of live instruction and over 120 training sessions throughout the month of September. A total of 520 participants attended in person on the three primary dates of the Summit that featured topics of broad interest. More than 360 additional participants registered for invitational days that focused on specialized topics. Notably, OGE held these high-quality training events exclusively in federal facilities in the Washington, D.C. metro area at a total cost, excluding salaries, of approximately $12,000 for the entire Summit.

As a means of both expanding the reach of the Summit and increasing the transparency of the executive branch ethics program, OGE leveraged technology to broadcast many of the sessions and a number of virtual-only events by live streaming video on the internet. This afforded additional stakeholders and interested members of the public significant access to the Summit. OGE has also posted recordings of these events on its YouTube and Google+ pages, so that they will remain available for future viewing. Web analytics indicate that this material has received 4,377 unique views.

As a result of the Summit, participants gained critical knowledge to increase their expertise in applying the ethics laws, rules, and regulations. They attended sessions covering topics such as: the rules applicable to special Government employees; the finer points of 18 U.S.C. § 208, the primary criminal conflict of interest law; the Standards of Ethical Conduct for Executive Branch Employees; post-employment restrictions; restrictions on the receipt of gifts; regulatory and individual exemptions from conflicts of interest requirements; rules controlling the participation of federal officials on the boards of outside entities; and STOCK Act requirements.

Summit sessions also covered topics that address the challenge of administering a strong agency ethics program. For example, participants attended sessions in which they had opportunities to explore approaches for administering sound financial disclosure systems, managing ethics records, and working with Inspectors General. They also attended sessions covering techniques for communicating government ethics requirements to government officials, compliance with regulatory requirements for agency ethics programs, electronic filing of financial disclosure reports, the identification of confidential financial disclosure filers, and other program management issues. Seasoned ethics officials shared lessons learned, model practices, and promising new practices that participants could choose to adopt for their own ethics programs.

Finally, the Summit exposed participants to the insights of speakers, from both inside and outside the government, related to the broader purpose and effect of organizations' ethics programs. Participants attended sessions on such diverse topics as the similarities, challenges, and solutions faced by private and public sector organizations in dealing with ethics; perspectives on the so called "revolving door;" the importance of government ethics; and ways in which the press, good government groups, and others work toward common goals in supporting the integrity of public institutions. These sessions fostered increased understanding among

OGE's internal and external stakeholders about the executive branch ethics program and how it protects the public trust.

Conducted regular and seasonal online distance learning events

In fiscal year 2014, OGE continued to deliver its Ethics Fundamentals and Advanced Practitioner distance learning series. These series are designed to address, respectively, the needs of new and more experienced ethics officials in the executive branch ethics community. These monthly events allow OGE to reach ethics officials throughout the government with timely policy guidance, basic training, advanced training, model practices, and ethics news and information. A typical event reaches more than 200 officials during the live broadcast and is available on-demand for viewing after the event. In 2014, OGE offered nine Advanced Practitioner events and nine Fundamentals events. In total, 3,214 officials registered for these events, and 92 percent of them reported that participating in these events made them better able to do their jobs.

In addition to the Ethics Fundamentals and Advanced Practitioner monthly distance learning series, OGE also offered 12 financial disclosure distance learning workshops. These small workshops allow attendees to interact with each other and engage directly in the review of sample hypothetical financial disclosure forms. Over 120 ethics officials registered to attend these workshops and 94 percent of them reported that participating in the workshops made them better able to do their jobs.

Expanded access to training through new formats and technology

In fiscal year 2014, OGE continued to leverage technology by taking advantage of new modes of delivering training to the ethics community. For example, OGE took a significant step toward expanding access to its distance learning offerings by creating a [Google+ page](). This allows OGE to broadcast distance learning events free of charge to anyone with an internet connection. In addition, training delivery through Google+ permits public access to the professional development training that OGE offers to ethics officials throughout government and around the world.

In addition to the monthly series and the small, application-based workshops, OGE developed and delivered two Massive Open Online Courses (MOOCs), modeled after the approach used by the higher education community. The MOOCs enable large numbers of ethics officials to experience content OGE typically only delivers through half-day live training workshops. The MOOCs are delivered virtually over two online sessions. The first session is an introduction to the materials, the exercises, and the expectations for the course, as well as a general introduction to the topic being addressed. The second session is a live debrief of the exercises led by OGE instructors. These courses address more advanced content and require participants to practice using their skills by completing exercises between sessions. Participants are encouraged to consult and collaborate with colleagues in completing the exercises, ask questions, provide comments, and otherwise actively engage in the analysis and discussion during the live debrief. To the greatest extent possible, the MOOCs bring the feel of in-person

classroom training to the online experience. Over 450 officials participated in the MOOCs, with 95 percent of attendees reporting that attendance made them better able to do their jobs.

Performance Goal: In fiscal year 2014, OGE significantly increased its educational offerings, which were well-received by attendees. As a result of attending courses offered by OGE, ethics officials overwhelmingly reported that they better understand the subject matter presented and believe they can more effectively perform their job functions.
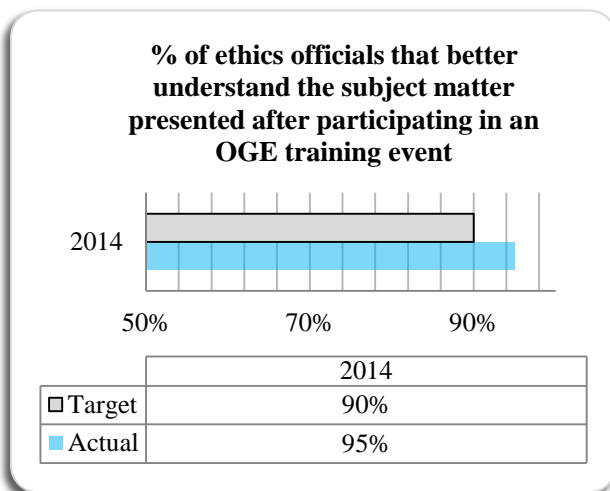
% of ethics officials that better understand the subject matter presented after participating in an OGE training event

	2014
☐ Target	90%
■ Actual	95%

Figure 10: Subject Matter Expertise

% of ethics officials that believe they can more effectively perform their job functions after participating in an OGE training event

	2014
☐ Target	90%
■ Actual	91%

Figure 11: Performance of Job Function

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to focus on providing cost effective training and education opportunities to ensure that ethics officials have the expertise and tools they need to do their jobs. To develop an education plan responsive to the needs of agency ethics officials, OGE conducted an assessment of ethics officials who attended previous training events to determine the format and content they need for their professional development. OGE will use data from the assessment to refine its educational offerings for 2015 and 2016. Key highlights of OGE's planned work are described below.

Develop training products

OGE will continue to develop ethics educational products and to disseminate products created by OGE and agency ethics programs through its virtual Institute for Ethics in Government Store located on MAX.gov. In particular, OGE's staff will create original products, including materials that agencies can customize to satisfy regulatory requirements for their new-employee ethics orientations and annual ethics training.

Hold twice-annual symposia for ethics practitioners

In fiscal year 2015, OGE will hold two symposia, one local and one in a region outside of the Washington, D.C. metro area. Based on 2013 data from the Annual Questionnaire, approximately 72 percent of all ethics officials (full-time and part-time combined) are located in

regional field offices. Often their access to OGE and live training OGE provides is limited by their distance from the Washington, D.C. metro area. OGE plans to hold a regional symposium in fiscal year 2015 to specifically address the critical professional development needs of regional ethics officials. It is anticipated that this training will have a tangible impact on maintaining the integrity of executive branch ethics programs across the country. OGE will also host a symposium in the Washington, D.C. metro area. The topics to be covered at both symposia will be informed by the data collected on the number and nature of questions OGE receives from agency ethics officials as recorded in Agency Information Management System (AIMS).

In fiscal year 2016, OGE will host its second National Government Ethics Summit. The primary focus of the Summit will be to prepare ethics officials to effectively respond to the ethics issues that will arise due to the Presidential transition in 2017. These issues include nominee financial disclosure, seeking employment, and post-employment restrictions. This event will be important to the success of OGE's role in the Presidential nominations process as described in more detail on page 26 under Strategic Objective 2.1.

Conduct online distance learning events and expand access to training

In fiscal year 2014, OGE invested in the tools necessary to produce quality, virtual training materials and events. This investment has resulted in a dramatic increase in the effective reach of OGE's training and positive feedback about the quality of the training delivered. OGE will continue to deliver the Ethics Fundamentals and the Advanced Practitioner distance learning series. In addition to these series, OGE will also offer distance learning workshops and will continue to deliver training through its newly developed MOOC program. OGE will broadcast these events free of charge through its Google+ and YouTube pages to expand access to its training to a larger audience. OGE will also leverage the experience and knowledge of the ethics community by inviting ethics officials to regularly present as part of these distance learning events. Through such training events, OGE will provide ethics officials throughout government with needed basic training, exposure to model practices, timely policy guidance, and ethics news and information.

Strategic Objective 1.4: Modernize and implement the ethics rules and regulations

Ethics rules and regulations serve as the building blocks of the executive branch ethics program. OGE reviews and revises the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21st century government.

Performance Highlights

Began an in-depth review of ethics regulations on gifts and seeking employment

In fiscal year 2014, OGE began an in-depth review of the Standards of Ethical Conduct for Executive Branch Employees found at 5 C.F.R. part 2635 (Standards).The Standards serve as the foundation of federal government employment and set the expectations of conduct for every executive branch employee. OGE targeted for review two areas of significant interest to ethics officials and employees: gifts and seeking employment. OGE focused its review on these topics

because the gift rules generate more questions than any other area of the Standards and because the rules governing seeking employment were affected by new requirements enacted as part of the STOCK Act. Specifically, these changes imposed additional reporting and recusal requirements for federal employees negotiating for future non-government employment. As part of its review, OGE solicited input from agency ethics officials to leverage the expertise and experience of those who are charged with providing employees advice on these rules every day. Their feedback was used to inform OGE's approach to revising the Standards and in drafting potential regulatory text.

Performance Goal: OGE met its target to begin drafting revisions to subparts B (Gifts) and F (Seeking Employment) of the Standards of Ethical Conduct for Executive Branch Employees.

Reviewed and updated ethics regulations

In addition to conducting a targeted review and update of the Standards, OGE updates its regulations to ensure that they reflect statutory changes and changes in other agencies' regulations. For example, in fiscal year 2014, OGE published a final rule amending the regulations on financial disclosure to reflect a statutory increase of the reporting threshold for gifts and travel reimbursements. OGE also published a final rule amending the Standards to increase the ceiling for the exception for non-sponsor gifts of free attendance at widely attended gatherings. This amendment reflected the increase by GSA of the de minimis level in the Foreign Gifts and Decorations Act. Finally, OGE issued a final rule revoking certain regulatory exemptions for senior employee positions at the Security Exchange Commission (SEC) from certain criminal post-government employment restrictions at the request of, and in consultation with, the SEC.

OGE also consults with agencies to publish agency-specific supplemental ethics regulations that tailor agency ethics program requirements to meet specific agency needs. In fiscal year 2014, OGE jointly issued two new supplemental agency ethics regulations related to agency employees seeking prior approval to engage in outside employment and component designations for post-employment restrictions.

Maintained and updated financial disclosure forms

OGE oversees a financial disclosure system designed to detect and resolve conflicts of interest that reaches more than 27,000 public and over 370,000 confidential financial disclosure report filers. As part of this oversight, OGE maintains and updates financial disclosure forms. In fiscal year 2014, OGE solicited comments through the Federal Register and submitted for approval a request to modify and renew the OGE Form 278 (Executive Branch Personnel Public Financial Disclosure Report) and OGE Form 450 (Executive Branch Confidential Financial Disclosure Report). In anticipation of the release of *Integrity*, OGE's electronic public financial disclosure system, OGE obtained approval for the OGE Form 278e, a streamlined rendering of information entered by filers into the system. OGE also submitted for approval its request to modify and renew the OGE Form 201 (Request to Inspect or Receive Copies of OGE Form 278

and Other Covered Records). All three requests were successfully approved and the revised forms were posted to OGE's website to provide filers and requesters with accurate forms.

Updated ethics records schedules

OGE worked with the National Archives and Records Administration (NARA) on updating its General Records Schedule (GRS) provisions related to ethics records. Specifically, OGE consulted with and assisted NARA in updating the GRS to revise and consolidate provisions related to the disposition of ethics records. OGE also assisted NARA in addressing comments on the proposed changes from agency ethics officials and agency records officers.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to work on modernizing and updating ethics regulations as needed to reflect current statutory and regulatory requirements; issuing supplemental agency ethics regulations in consultation with executive branch agencies; and maintaining and updating OGE financial disclosure and other forms. OGE will also continue to work with NARA on updating the GRS to consolidate the provisions related to ethics records disposition. Key highlights of OGE's planned work are described below.

Submit new and revised ethics regulations for review and publication

In fiscal year 2015, OGE plans to make significant progress toward finalizing key regulatory changes. OGE will finalize the regulations concerning negotiations for future employment required by the STOCK Act. These regulations will ensure that executive branch employees have clear guidance on how to comply with these requirements when they seek employment outside of the government. OGE will also finalize and submit the proposed changes to the Standards on the acceptance of gifts from outside sources to the Department of Justice and the Office of Personnel Management, as is required by OGE's organic statute. OGE will also provide the proposed changes to other stakeholders, such as good government groups and ethics officials, for review. These proposed regulatory changes would tailor the gift rules to focus on issues that could affect the public's confidence in government decision making.

In fiscal year 2016, after receiving the necessary clearance from the Department of Justice, the Office of Personnel Management, and OMB, OGE plans to publish the proposed changes to the Standards in the Federal Register for public comment. OGE's update to the Standards will ensure continued effectiveness and applicability to situations faced by employees in a 21st century government. In fiscal years 2015 and 2016, OGE will also begin the process of revising its training regulations.

Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch

OGE plays an important role in the continuity of senior leadership in the executive branch by assisting in the President's constitutional duty to nominate and appoint officers to the executive branch. Specifically, OGE works with agency ethics officials to identify and resolve

any conflicts leaders coming into government may have. This work is especially critical during a Presidential transition when, due to vacancies in virtually every high-level position, the nation is particularly vulnerable to risks. Therefore, the requested resources, staffing and *Integrity* funding is vital in 2016 to ensure that OGE is ready for the 2017 post-election period. Because agency leaders play a significant role in promoting an ethical culture and supporting an agency's ethics program, OGE also leverages the nomination process to impart to new agency leaders the importance of the ethics program and their role in supporting it. In addition, OGE contributes to the continuity of senior leadership by supporting succession-planning efforts in executive branch agency ethics programs. Proper succession planning is key to mitigating the loss of ethics expertise that stems from the significant turnover within the executive branch due to the retirement of experienced executive branch officials.

Strategic Objective 2.1: Provide assistance to the President and the Senate in the nomination of top-level executive branch officials

OGE reviews the financial interests of nominees to Presidentially-appointed, Senate-confirmed (PAS) positions for possible conflicts of interest with their prospective duties. OGE works with ethics officials to resolve any identified potential conflicts of interest on the part of nominees by establishing written ethics agreements with them prior to confirmation. For most PAS nominees, OGE's financial disclosure program represents their first encounter with the ethics requirements of the executive branch. Therefore, the ethics review of PAS nominees' financial interests provides OGE with the opportunity to impress upon these most senior executive branch officials the importance of their roles as top leaders in creating and fostering an ethical culture at their agencies.

OGE's role in assisting the President in nominating top-level executive branch officials is particularly important during the transition period following a Presidential election. The nation is vulnerable to a variety of risks, including risks associated with national security and natural disasters, during a Presidential transition when leadership is transferred and nearly all political positions are vacant. For this reason, the processing of Presidential nominations must be accomplished as efficiently as possible. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest, a role for which OGE's workload is expected to triple with the election of a new Administration in 2016. OGE will prepare for the transition by filling vacant ethics positions and cross training existing staff, as well as devoting additional resources to prepare its staff and agency ethics officials across government for the anticipated increase in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2017 and beyond.

Because OGE's new efiling system, *Integrity,* was newly launched in January 2015 and because OGE expects to continue to refine and upgrade the system, OGE, in consultation with OMB, has highlighted this objective as a "focus area for improvement."

Performance Highlights

Reviewed financial disclosure reports of the highest government leaders

In fiscal year 2014, OGE reviewed the reports of nominees for approximately 25 percent of the Senate-confirmed, Presidentially-appointed positions. By leveraging existing resources and improving internal processes and tracking, OGE was able to meet the priorities set by the White House and the Senate.
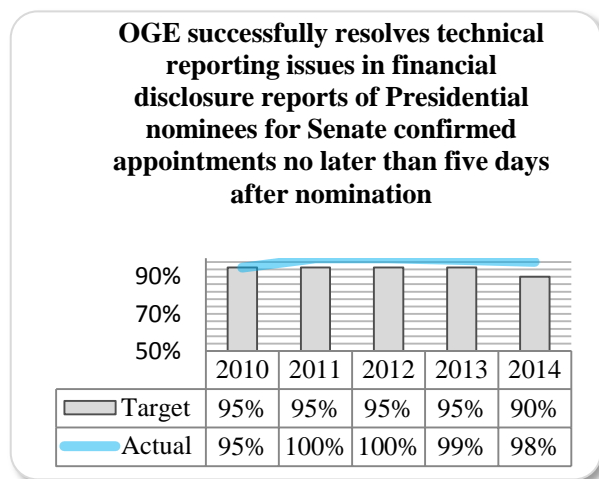
OGE successfully resolves technical reporting issues in financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination					
	2010	2011	2012	2013	2014
Target	95%	95%	95%	95%	90%
Actual	95%	100%	100%	99%	98%

Figure 12: PAS Nominee Financial Disclosure Reports

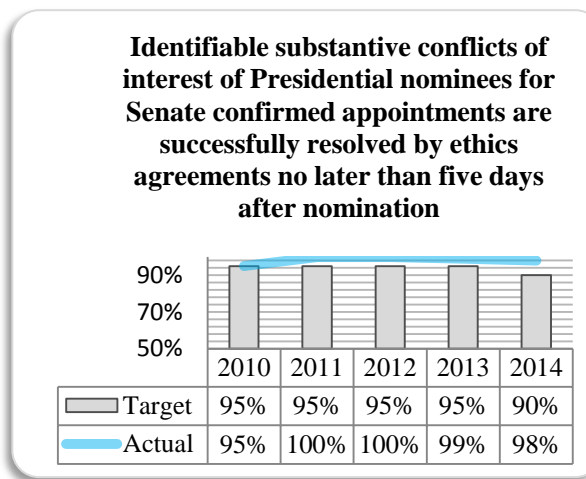| Identifiable substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination					
	2010	2011	2012	2013	2014
Target	95%	95%	95%	95%	90%
Actual	95%	100%	100%	99%	98%

Figure 13: Ethics Agreements of PAS Nominees

Performance Goal: OGE measures its performance by the successful and timely resolution of conflicts and technical reporting issues for nominee financial disclosure reports. OGE's standard is to resolve conflict and technical reporting issues no later than five days after a nomination is made. OGE continues to exceed its targets in this area.

Developed key resources for financial disclosure filers

In fiscal year 2014, OGE created two new resources to help nominee financial disclosure filers more accurately complete their reports. These resources clarify financial disclosure reporting requirements, including the types of financial interests that must be reported, and explain how to report commonly held financial interests. By improving the accuracy and completeness of initial financial disclosure report drafts submitted by filers, these resources ultimately assist agencies and OGE in more efficiently identifying potential financial conflicts of interest and decrease the time it takes to resolve technical reporting issues.

Developed a statutorily-mandated electronic public financial disclosure filing system for the executive branch

In fiscal year 2014, OGE substantially completed development of *Integrity*, OGE's system for the electronic filing and review of public financial disclosures (OGE Forms 278 and 278-T) required for certain high-level executive branch officials, as mandated by the STOCK Act. The development of such a large and complex system was an immense undertaking for an agency with OGE's limited human resources and technological expertise. Developing and testing

Integrity required an agency-wide commitment and participation from virtually every member of OGE's staff. It is anticipated that *Integrity* will greatly enhance the filing, review, and program management aspects of the executive branch public financial disclosure program. It will also meaningfully increase OGE's oversight capability by allowing OGE to monitor agencies' progress in administering their individual financial disclosure programs.

In addition to the internal work that OGE dedicated to developing *Integrity,* during fiscal year 2014, OGE routinely collaborated with groups from throughout the government in order to share ideas and to ensure that the system met the needs of its stakeholders. These groups included financial disclosure report filers, executive branch agency ethics officials, and ethics officials and system developers from all branches of government.

Throughout the development process in fiscal year 2014, OGE conducted extensive evaluations of the system to ensure that it complied with government security, privacy, and various technical requirements. OGE undertook rigorous verification and validation testing among executive branch ethics officials and OGE staff. OGE also held numerous information and question-and-answer sessions on *Integrity* for the executive branch ethics community during OGE's month-long National Government Ethics Summit in September 2014.

Planned Work for Fiscal Years 2015 and 2016

Prioritize and increase capacity to review complex financial disclosure reports of high-level government officials

In fiscal years 2015 and 2016, OGE will prioritize hiring and training staff on complex financial disclosure issues to prepare for the surge in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2017, following the 2016 Presidential election. During the Presidential transition, OGE anticipates the turnover of most of the approximately 1,200 PAS positions in the executive branch. Because OGE uses a cross-functional approach to staffing the nominee report review program, particularly during peak workload periods, it will hire professional ethics staff in key mission areas, specifically compliance and agency support, and cross-train the staff to support financial disclosure work. This approach ensures both short-term capacity for its critical PAS nominee work in the post-election period and long-term support for OGE's mission-critical work. OGE will also devote significant resources toward building the knowledge and skills of OGE staff members who review financial disclosure reports by providing classroom as well as hands-on experiential training.

Assist agencies in preparing for the ethics and financial disclosure responsibilities associated with a Presidential transition

In addition to managing the surge in financial disclosure filings related to a high volume of incoming nominees, agencies also must provide each new employee with an initial ethics orientation. Further, those officials leaving government service must be educated about the various ethics rules that apply to seeking employment and post-government employment. In fiscal years 2015 and 2016, OGE will provide resources and education opportunities to ethics officials on these other Presidential transition-related topics. This will involve updating all

transition materials, including training resources for agency ethics officials and incoming nominees concerning ethics rules, financial disclosure, and the criminal conflict of interest statutes. OGE will also devote additional staff resources to conducting training for nominee financial disclosure reviewers at agencies throughout the executive branch and to meeting with key executive branch agency ethics officials to support them in their own preparations for the post-election period. This work will help ease the transitions of PAS nominees into top leadership positions in the new Administration in 2017.

OGE will also present a National Government Ethics Summit in fiscal year 2016, focused on financial disclosure review for nominees and other transition-related topics such as post-government employment. The Summit will consist of multiple in-person events including a full-day in-person event for the approximately 300 agency ethics officials who review nominee financial disclosure reports. This event will provide an opportunity for ethics officials to gain hands-on experience in reviewing nominee financial disclosure reports and will be followed by smaller workshops that build on the knowledge gained at the event.

Launch and operate Integrity, OGE's electronic executive branch-wide public financial disclosure system

In fiscal year 2015, OGE launched and began operating *Integrity,* the executive branch-wide public financial disclosure system required by the STOCK Act. OGE will continue to refine and enhance the system in fiscal years 2015 and 2016. More specifically, in fiscal year 2015, OGE will actively collaborate with agencies to tailor various administrative roles and workflows to conform to agencies' financial disclosure filing and review structures. OGE will work with agencies to establish filer accounts and to assist them in configuring their administrative preferences within the system so that financial disclosure filers can enter and submit reports for review and certification by ethics officials during the fiscal year 2015 filing cycle. OGE will also implement a vigorous user support plan. This plan will include the development and publication of an online assistance library complete with FAQs, video tutorials, and quick-start guides. OGE will hire two additional professional IT personnel to staff a full-time help desk that ethics officials can contact with their questions about *Integrity*. OGE will also take the opportunity during the first year of *Integrity*'s operation to monitor and assess user feedback regarding the system functionality as well as its operating experience. This will allow OGE to prioritize and implement any necessary system enhancements and to address any technical issues that are likely to arise in such a complex application. Based on this experience and user feedback, in fiscal year 2016 OGE will use requested funding to develop an improved version of *Integrity* to ensure it is available in time for the Presidential transition.

In fiscal year 2016, OGE will also continue to focus on operating, refining, and enhancing *Integrity.* Specifically, OGE will use requested funding to develop a significantly revised version of *Integrity* and to finalize the improved version of the efiling system prior to the Presidential election. The upgraded version will be critical because it is expected to add important new functionality not included in the initial launch of the system, such as system "flags," advanced analytics, and expanded ethics-related data collection and tracking. Moreover, in fiscal year 2016, after *Integrity* has been operational for a full year, OGE anticipates that even

more agencies will transition to *Integrity* from fee-for-use efiling systems in order to take advantage of the additional functionality that *Integrity* will provide at no cost.

Strategic Objective 2.2: Promote leadership support of the executive branch ethics program

The success of each agency's ethics program is in large part dependent on the commitment of the agency's leadership to, and involvement in, the ethics program. Leadership support of an agency's ethics program helps agencies identify, assess, and mitigate risk to an agency's reputation and mission, enables agency leaders to focus on and accomplish agencies' missions, and helps ensure the integrity of government programs and operations.

Performance Highlights

Engaged agency leaders about the importance of ethics

Throughout fiscal year 2014, OGE renewed its commitment to meet with senior leaders in the executive branch to emphasize the importance and benefits of a strong executive branch ethics program and the unique role agency leadership plays in promoting an ethical culture. Notably, OGE's Director met with the Chair of the Federal Reserve and the Secretary of the Department of Veterans Affairs. OGE leaders also met with senior leaders and ethics officials from other agencies such as the Department of Defense. OGE used these opportunities to discuss the ways in which agency leaders can support the ethics program and to solicit feedback on how OGE can provide support and assistance to agencies.

Performance Goal: In OGE's Survey of Ethics Officials, 88 percent of respondents reported that their agency leaders demonstrate support for the ethics program. Also, ethics officials from 119 agencies indicated that in calendar year 2013, they had reported directly to the agency head about the status of the ethics program. This is a strong indicator that ethics officials have access to agency leaders.

Provided training on risk management for agency leaders

As part of the National Government Ethics Summit held in September 2014, OGE provided several sessions and workshops on organizational risk management for senior government officials. These sessions focused on, among other things, the importance of ethics and on the role of agency leadership in promoting the executive branch ethics program. OGE also conducted sessions on ways that agency ethics officials can help leaders take responsibility for their agencies' ethics programs and lead those programs to success.

Sensitized federal managers to ethics issues

OGE presented on ethics topics at various events targeted at higher level personnel in fiscal year 2014. For example, OGE participated in a panel discussion titled "Ethics and Optics," which was part of a two-day orientation session for 250 new Senior Executive Service (SES) members. The panel was designed to help participants recognize and avoid common ethical violations, identify the people who can help them to navigate potential pitfalls, and encourage

them to serve as ethical leaders in their own organizations. OGE also presented at the National Annual Federal Hispanic Women Leadership, Diversity and Inclusion Training Program, which is targeted at federal government supervisors and managers who oversee federal employees.

Planned Work for Fiscal Years 2015 and 2016

As a result of the findings of OGE's strategic objective review process, in fiscal years 2015 and 2016, OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will use its education and training program to raise awareness of the benefits of a strong ethics program in reducing agency risk. In addition, OGE will further consult with ethics officials to determine how OGE can best support their efforts to engage agency leadership. Key highlights of OGE's planned work are described below.

Use agency ethics program reviews to engage agency leadership

In fiscal years 2015 and 2016, OGE will continue to work with agency ethics officials to identify steps OGE can take to provide assistance in gaining leadership support for individual agency ethics programs. For example, during its program reviews of agency ethics programs, OGE will recommend that agency leaders take a visible role in the program and will recognize in its program review reports activities that agency leaders have taken to support the ethics program. Also in connection with OGE's program review processes, the Director will include personal transmittal letters to the heads of certain agencies as part of the review report packages. These letters will invite agency heads to meet with him to discuss the results of program review reports and the ethics program in general.

Communicate directly with agency managers and leaders

In fiscal year 2015, OGE will implement a new process of sending year-end status reports to the head of each agency regarding the annual financial disclosure reports of the agency's PAS officials. The status report will include, if applicable, the name(s) of the PAS officials(s) whose reports OGE has not certified. OGE will institute this practice because financial disclosure is the primary tool for identifying and resolving potential conflicts of interest on the part executive branch officials. An agency's failure to collect and review PAS officials' reports, resolve all conflicts of interest, and obtain OGE's certification in a timely manner places filers at risk of violating criminal conflicts of interest laws. More broadly, it diminishes the credibility of the ethics program and undermines the public's confidence in the integrity of the government's operations.

OGE will also continue to identify opportunities to communicate directly with senior leaders in government by speaking at events targeted at agency managers and other senior leaders, such as management training programs for SES employees offered by entities such as OPM and the Partnership for Public Service.

Raise awareness of the benefits of a strong ethics program in reducing agency risk

In fiscal years 2015 and 2016, OGE will dedicate a portion of its distance and in-person learning events to the topic of enterprise risk management, as defined by section 270 of OMB Circular A-11. In these sessions, OGE will discuss with ethics officials how the ethics program can support their agency and its leaders in implementing agency-wide risk management. Instructors will discuss how ethics officials can work with leadership to identify, assess, and address ethics and reputational risk at their agencies.

Strategic Objective 2.3: Support succession planning in executive branch ethics programs

OGE supports succession planning in executive branch ethics programs to minimize the impact of employees leaving the workforce. Succession planning requires the documentation of current processes, transfer of institutional knowledge, and availability of personnel prepared to assume ethics official positions at all levels. OGE provides training that supports succession planning in agency ethics programs.

Performance Highlights

Enhanced the professional development of agency ethics officials

In fiscal year 2014, OGE supported the development of new ethics officials by delivering nine intensive days of fundamental ethics education through its Intensive Curriculum for New Ethics Officials program. This program targeted new ethics officials who had a critical need for intensive and rapid professional development because they had been or would soon be newly assigned to ethics responsibilities as Designated Agency Ethics Officials (DAEOs), Alternate DAEOs, or ethics program managers. By focusing on those officials with the greatest responsibilities, OGE provided targeted, timely support to ensure continuity of operations in agency ethics programs.

Performance Goal: Twenty-one ethics officials attended the Intensive Curriculum for New Ethics Officials. One-hundred percent of attendees who returned course evaluations reported that they are better able to do their jobs as a result of the program. This result greatly exceeds OGE's target of 80 percent.
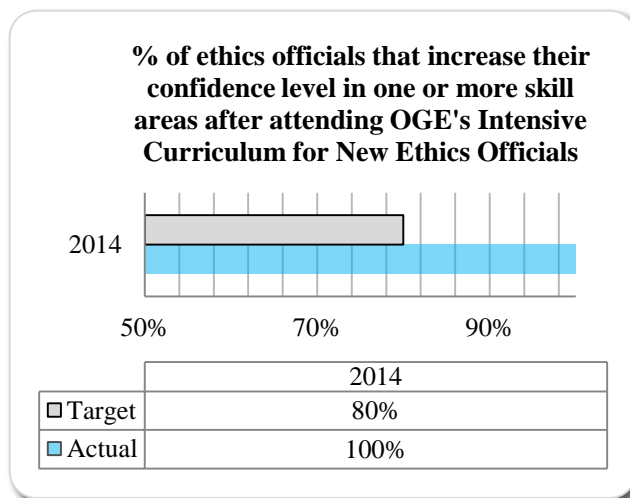

% of ethics officials that increase their confidence level in one or more skill areas after attending OGE's Intensive Curriculum for New Ethics Officials

	2014
☐ Target	80%
☐ Actual	100%

Figure 14: Intensive Curriculum for New Ethics Officials

Developed qualified agency ethics instructors

OGE also conducted five instructor development courses. The Instructor Development Program is a certificate program for agency ethics instructors who, upon successful completion,

are qualified to effectively deliver OGE-developed ethics courses in their own agencies and throughout the executive branch. The Instructor Development Program expands the number of instructors available to deliver important ethics education to ethics program staff throughout the government. Moreover, it supports succession planning in agency ethics programs by empowering and equipping agencies to provide quality internal professional development to their own ethics program staff in a targeted way that best meets their staff development needs. In fiscal year 2014, officials from 10 agencies attended the program and successfully learned to teach one or more OGE-created courses.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will build on its efforts to assist agencies in training future ethics officials and will leverage the expertise of experienced ethics officials through the Instructor Development Program. Key highlights of OGE's planned work are described below.

Provide targeted training to support succession planning

In fiscal years 2015 and 2016, OGE will educate ethics officials on ethics matters related to Presidential transitions. OGE will also dedicate a significant portion of its Advanced Practitioner Series to help ethics officials solidify ethics program processes and procedures, as well as maintain institutional knowledge to ensure the strength of agency ethics programs even in times of transition. For example, OGE will promote routinizing risk assessment and mitigation, standard operating procedures to ensure program continuity, techniques for briefing new leaders, and methods of program self-assessment to ensure preparedness for turnover.

Offer firsthand experience to agency ethics officials through an interagency detail at OGE

OGE will also continue to invite agency ethics officials to participate on an interagency detail at OGE. Ethics officials would serve as Desk Officers or financial disclosure reviewers while on detail at OGE. This detail program strengthens the executive branch ethics program because it allows agency ethics officials to gain valuable hands-on experience with support from OGE's knowledgeable staff and then bring that knowledge back to his or her home agency ethics program.

Strategic Goal 3: Promote transparency of the executive branch ethics program

Building public confidence in the impartiality of government decision making is at the core of OGE's mission. In support of the President's commitment to the principle of an open government, OGE directs resources toward raising the visibility of the systems in place to identify and resolve conflicts of interest and making ethics documents publicly available. Transparency increases accountability and public confidence by providing information to the public about the inner workings of government and the integrity of its decision-making processes.

Strategic Objective 3.1: Raise the visibility of the executive branch ethics program and the U.S. Office of Government Ethics

Raising the visibility of the executive branch ethics program and of OGE are critical steps toward building public confidence and awareness of the systems in place to protect the integrity of government operations and programs. To raise the visibility of the executive branch ethics program, OGE shares information and engages with audiences inside the federal government as well as external audiences, including members of the general public, state and local governments, private sector organizations, professional associations, government watchdog groups, the media, and foreign delegations.

<u>Performance Highlights</u>

Built a culture of information sharing and strategic communication

In fiscal year 2014, OGE pushed its initiative to build a culture of information sharing and strategic communications with its external stakeholders. In fiscal year 2014, a cross-division communications team worked to ensure consistency in OGE's external messaging, develop comprehensive communications plans for significant OGE initiatives, and create compelling and audience-friendly content for OGE's various communications platforms, including OGE's social media accounts and website. These efforts ensure that OGE disseminates information in a manner that is more easily understood by and accessible to its external stakeholders and that is targeted to those most interested in the content. These communications also ensure that OGE's stakeholders gain a greater understanding of OGE's work and can identify opportunities for coalition building and collaboration with OGE.

Performance Goal: Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program. OGE measures the success of this performance goal through various performance indicators included in Figures 15-17 below.

Used OGE's website and social media as platforms to inform and educate

OGE's website is its primary tool for communicating with its external stakeholders. In fiscal year 2013, OGE began the process of reviewing and updating content on its website to ensure that the public can understand the work of OGE. In fiscal year 2014, OGE implemented a new strategy for communicating with the public through Director's Notes posted on the homepage of OGE's website, www.oge.gov. The Director's Notes provide a public-friendly explanation of OGE's role in the executive branch ethics program, ethics rules and regulations, OGE's programs and initiatives, and current ethics issues. In fiscal year 2014, OGE published 21 Director's Notes on important topics, such as the purpose of financial disclosure, OGE's oversight role, and the value of OGE's Conflict of Interest Prosecution Survey. Several of these Notes were mentioned in news media articles, thereby increasing OGE's reach to the public.

OGE also uses social media to broaden its reach to key external stakeholders. Effective outreach helps ensure that the public understands the purpose of the executive branch ethics program. Specifically, OGE uses its Twitter account to drive traffic to substantive ethics content

on its website and to provide information about the executive branch ethics program to the public. In fiscal year 2014, OGE reached out to good governance groups, watchdog organizations, and the media though email campaigns inviting them to follow OGE on Twitter and participate in live-tweeting at the 2014 National Government Ethics Summit. In

How are people connecting with OGE on social media?

Twitter   **YouTube**   **Google+**

Figure 15: Social Media

addition, OGE expanded its use of social media by creating new Google+ and YouTube pages. OGE used these accounts to live stream Summit sessions.
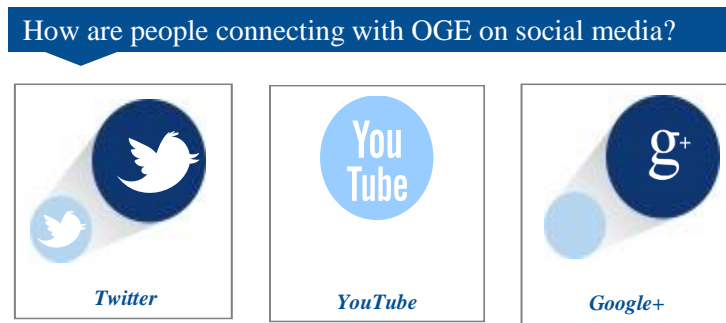
Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of new visitors to OGE's website and the continued growth in the number of its Twitter followers. In fiscal year 2014, the number of first-time visitors to OGE's website increased by five percent over the previous fiscal year. In addition, OGE's followers on Twitter increased 180 percent to 421 followers. In total, 421,739 people visited OGE's website.

Collaborated with and engaged stakeholders

In fiscal year 2014, OGE continued to participate in professional, good government, and interagency groups to discuss emerging ethics issues and trends, share model practices, develop sound ethics policies, and combine resources to more effectively ensure that government decisions are made for the benefit of the public and not private gain. In fiscal year 2014, OGE continued to actively participate as a member of the Ethics and Compliance Officer Association (ECOA), the Council on Governmental Ethics Laws (COGEL), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE). As a member of ECOA and COGEL, OGE shared its legal analysis, programmatic experience, and model practices with the private sector and state and local government agencies by participating in message board discussions, training, and in-person meetings, as well as by responding to direct requests for information. For more information on OGE's involvement with CIGIE, see page 16.

In addition, OGE participated in interagency groups such as the Performance Improvement Council (PIC) and the General Counsel Exchange to share information about OGE and the executive branch ethics program. For example, OGE was asked to participate in a Google+ hangout hosted by PIC to describe OGE's mission and discuss how OGE effectively implemented strategic planning to meets its mission. OGE's involvement with these organizations not only fosters valuable communication, it also leads to innovations in OGE's practices related to training, program and performance management, and general law.

OGE also organized in-person meetings with ethics practitioners and the leadership of good governance and government watchdog groups in fiscal year 2014. For example, OGE met with the President of the Partnership for Public Service to discuss ways that OGE and the Partnership for Public Service could work together to help ensure an effective Presidential

transition. These meetings create opportunities to collaborate and share resources and information that enhance the executive branch ethics program. Further, through OGE-initiated "three branch meetings," OGE continued to collaborate with the most senior ethics practitioners from each branch of government. In fiscal year 2014, OGE conducted three three-branch meetings to exchange information and discuss experiences related to key topics of common interest in the field of government ethics, such as gifts from outside sources, outside employment and activities, and electronic financial disclosure. These meetings resulted in a greater understanding of approaches taken to address common issues and the differences in the role of each branch's ethics program.

To further promote understanding of the executive branch ethics program and its mission, OGE also continued to build relationships with its external stakeholders. For example, OGE accepted speaking invitations to address its external audiences, including members of academia, professional associations, and the Inspector General community, on topics including conflicts of interest, ethical leadership, and enforcement. OGE then leveraged those relationships to bring the expertise of its external stakeholders to its National Government Ethics Summit. Members of good government and government watchdog groups, state and local governments, the media, the international anti-corruption community, and academia attended and presented at the Summit. The organizations that presented at the Summit included the Partnership for Public Service, Public Citizen, Project on Government Oversight, members of academia, Federal News Radio, legislative and judicial branch ethics officials, Ethics Resource Center, private law firms, and the Ethics and Compliance Officers Association. Their attendance at the Summit is a direct result of the efforts OGE has made to build and strengthen relationships with its external stakeholders.

Performance Indicator: In fiscal year 2014, OGE presented to nine organizations.

Responded to requests for information and provided assistance

OGE responds to requests for information and assistance from its external stakeholders on topics such as public financial disclosure, gifts from outside sources, and post-employment. For example, in fiscal year 2014, OGE responded to over 100 requests for assistance from the press. These interactions result in more accurate reporting about the ethics rules and regulations. These interactions also multiply OGE's ability to reach the general public to further promote understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also responded to requests for assistance from other stakeholders, including over 200 requests from public citizens. This assistance promotes understanding of the executive branch ethics program and related ethics rules and regulations.

Requests for Assistance (Non-Agency Audiences)	
Public Citizens	224
Press	116
Congress	20
For-Profit	53
Non-Profit	17
International	26
State/Local	9
Academia	14
Judicial	3

Figure 16: Requests for Assistance

Performance Indicator: In fiscal year 2014, OGE responded to 482 requests from non-government, external stakeholders. See Figure 16. In addition, OGE and the executive branch ethics program were mentioned in 42 media articles during fiscal year 2014.

Shared information with foreign delegations and supported anti-corruption efforts

OGE continued to meet with foreign public and private sector groups through the State Department's International Visitor Leadership Program and similar programs. Through these programs, foreign delegations come to OGE to learn about the executive branch ethics program and how that program fits under the broader rubric of anti-corruption, good governance, and transparency.

In fiscal year 2014, OGE briefed 22 foreign delegations comprising 256 individuals representing 76 countries, as highlighted in Figure 17. Also of note, OGE completed the first stage of a review conducted within the Follow Up Mechanism to the Inter-American Convention against Corruption, known as MESICIC for its Spanish acronym. In 2014, the MESICIC Committee of Experts began reviewing OGE as one of four U.S. anti-corruption oversight bodies, i.e., those that prevent, detect, investigate, and/or punish corruption. In fiscal year 2015 the Committee will conduct a site visit at each of the four U.S. oversight bodies. OGE will then participate in the MESICIC plenary meeting during which the report for the U.S. will be adopted.

Figure 17: Information Sharing with Foreign Delegations

OGE also continued to support U.S. government anti-corruption reporting requirements and good governance goals through a variety of multilateral forums such as the United Nations, World Bank, and Organisation for Economic Co-operation and Development, often at the direct request of the U.S. State Department. Finally, OGE continued to provide information about the executive branch ethics program in response to bilateral requests for assistance in benchmarking and improving anticorruption programs.

Maximized the use of communication tools to increase reach to and engagement with external stakeholders

In fiscal year 2014, OGE refined the way it tracks and analyzes its external communication outreach efforts through website and social media analytics platforms, the Agency Information Management System (AIMS, and other internal tracking mechanisms. These refinements enabled OGE to ensure that it targeted its priority audiences and efficiently used digital communications tools.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will continue to expand its external communications efforts to raise the visibility of the executive branch ethics program generally and OGE's work in particular. Key highlights of OGE's planned work are described below.

Use data to refine communication strategies and tools

To reach and broaden its audiences both within and outside the federal government, OGE will continue to refine its communications tracking systems and analyze the data it gathers. OGE will place a greater emphasis on making data-driven decisions to improve its use of its website, social media accounts, and other communication tools. OGE will also use analytics to better tailor the content of its communications to its external audiences and to identify and remedy gaps in its communications outreach to priority audiences.

Continue to build a culture of information sharing and strategic communication

In fiscal year 2015, OGE's cross-divisional communications team will develop content guidance for OGE employees, including creating standards for consistency within OGE's digital media, and will provide regular communications updates through quarterly reports to management and presentations at agency-wide meetings. These efforts will help OGE employees present important ethics information to OGE's external audiences in a way that is more consistent, accessible, and easily understood.

Expand the reach of OGE communications

Through digital media OGE is able to reach a greater number of people and expand the reach of its communications about the systems in place to protect the integrity of the government. OGE will continue to refine the content that is posted on its website to ensure that it is timely, complete, and being viewed by visitors to OGE's website. OGE will explore ways to assess whether its communications are having the intended impact. OGE will also evaluate, and implement as appropriate, new communications tools to reach priority audiences.

Collaborate with and engage stakeholders through active memberships, in-person meetings, and speaking engagements

To share information and foster valuable collaboration, OGE will continue to participate as a member of ECOA, COGEL, and CIGIE, in addition to interagency groups, such as the General Counsel Exchange. OGE will research and seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission. 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 through regular meetings.

Timely respond to external requests for information and assistance

OGE will continue to be responsive to requests for information and requests for assistance from its external stakeholders. Through these interactions, OGE aims to increase their understanding of the ethics laws so that accurate information is disseminated about the executive

branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and producing news releases. OGE will also continue to respond to the numerous requests for information it receives from the general public.

Support the United States foreign policy initiatives

Finally, at the request of the U.S. foreign policy agencies, OGE will continue to participate in international programs designed to support and enhance U.S. foreign policy initiatives and assist in the areas of anti-corruption and good governance. OGE also will continue to meet with foreign delegations to provide information about U.S. implementation of ethics and good governance programs.

Strategic Objective 3.2: Ensure that ethics information is publicly available

Public availability of ethics information assures the American public that senior leaders are making decisions based on the interests of the public rather than their own personal financial interests. Ethics information includes public financial disclosure reports, program review reports on agency ethics programs, and written policy guidance. The availability of this information also assists executive branch employees in understanding the basic obligations of public service, holds OGE accountable for its activities, and supports ethics officials in carrying out the duties of their positions.

Performance Highlights

Timely made ethics documents available online

In fiscal year 2014, OGE continued to timely make available ethics documents on its website. These documents included public financial disclosure reports and ethics agreements, program review reports on agency ethics programs, reports on payments for travel received from non-federal sources in connection with attendance of employees at certain meetings, and written policy guidance. OGE also continued to use its Twitter account, @OfficeGovEthics, to direct external stakeholders to detailed information on its website and to provide external audiences an additional way to access OGE's latest publications. OGE also used its Twitter account to provide information regarding changes in executive branch ethics laws, regulations, and programs. OGE's making these documents available allows the public to access and review them and to have greater assurance that the systems to identify and resolve conflicts of interest are in place and are effective.

Performance Goal: OGE exceeded its target to timely post 80 percent of ethics documents online within established time frames.

% of ethics documents posted online within established timeframes

	2014
☐ Target	80%
☐ Actual	90%
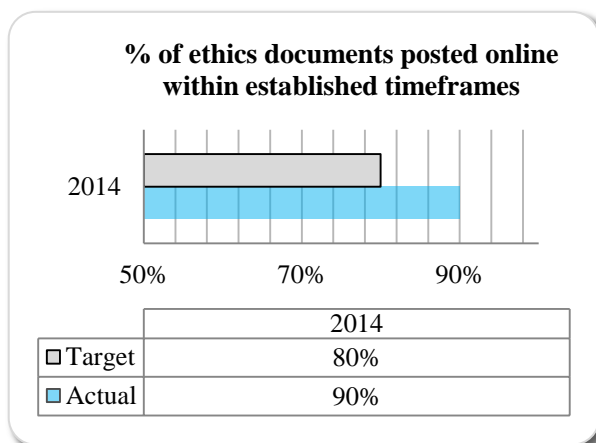
Figure 18: Posting ethics documents

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Analyzed availability of ethics documents

In fiscal year 2014, OGE began an analysis to identify additional ethics documents that could be posted on its website to promote the public's understanding of OGE's mission and the executive branch ethics program. OGE plans to complete this analysis with the goal of augmenting the ethics documents available to the public on its website.

Administered a strong Freedom of Information Act (FOIA) program

In fiscal year 2014, in its annual assessment of agency progress in implementing the Attorney General's FOIA Guidelines, DOJ's Office of Information Policy awarded OGE the highest possible score for having an effective system in place for responding to FOIA requests, increasing proactive disclosures, improving timeliness in responding to requests, and reducing backlogs . OGE received the second highest possible score for applying a presumption of openness in responding to FOIA requests. OGE has continually updated its internal FOIA procedures to conform to the OPEN Government Act of 2007, the President's 2009 Memorandum on the FOIA, guidance issued by the DOJ, and best practices.

Began modernizing OGE's FOIA regulations

In fiscal year 2014, OGE reviewed and drafted revised its regulations to better reflect OGE's current FOIA practices and overall best practices, as well as its current organizational structure. OGE also concurrently participated in an interagency process, led by DOJ's Office of Information Policy, to develop a common set of FOIA regulations that will be applicable to agencies government-wide.

Planned Work for Fiscal Years 2015 and 2016

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision making, in fiscal years 2015 and 2016, OGE will continue to timely post a variety of critical ethics documents on its website, such as agency program review reports and financial disclosure reports of high-level officials. OGE will also continue to respond to FOIA requests and to maintain a strong FOIA program. Key highlights of OGE's planned work are described below.

Expand public availability of ethics documents

OGE will complete its analysis of the ethics documents maintained at OGE to identify additional documents to make publicly available through its website. OGE will post the information in a manner easily understood and accessible by the public.

Pursue modernization of OGE's FOIA regulations

In fiscal years 2015 and 2016, OGE will continue to timely respond to FOIA requests. In fiscal year 2015, OGE will publish the proposed changes to its FOIA regulations in the Federal Register for public notice and comment. OGE will respond to comments received regarding

these proposed changes and will complete its update of OGE's FOIA regulations by publishing a final rule in the Federal Register. OGE will also concurrently continue to participate in the interagency process, led by DOJ's Office of Information Policy, to develop a common set of FOIA regulations that will be applicable to agencies government-wide.

Section IV – Managing for Results

This section describes OGE's past and planned work related to its management objectives, the steps OGE has taken to maintain a culture of performance, and OGE's progress toward achieving the President's Management Agenda.

Management Objectives

OGE devotes significant resources toward promoting professional development opportunities for its staff and undertaking process improvement. These two efforts are critical to OGE achieving its mission-focused strategic objectives.

Organized by management objective, this section highlights the major accomplishments that OGE achieved in fiscal year 2014, provides data on OGE's success in achieving its management objectives and performance goals during fiscal year 2014, and describes OGE's planned work for fiscal years 2015 and 2016. Information on how OGE will measure its progress toward achieving its management goals in fiscal year 2016 can be found in Appendix A.

Management Objective 4.1: Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities

OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities, as well as support through the dedication of time and resources. In fiscal year 2014, OGE expanded the use of a unique professional development process that OGE developed and piloted in 2013. OGE calls this process the Employee Development Program (EDP).

In some respects, the EDP builds on the Individual Development Plan required by OPM. The EDP incorporates the requirements of OPM's Individual Development Plan but goes further by identifying individual employee learning objectives that must be tied directly to OGE's strategic plan and to the organizational goals of the employee's work unit. The EDP identifies specific formal training, mentoring, self-study, and/or on-the-job training activities that the employee will complete in the covered period. Significantly, the EDP also identifies objective measures for assessing the employee's acquisition of the targeted knowledge or skills. Often, this measurement will involve the employee's completion of a work product or delivery of a presentation related to the training, with the supervisor evaluating the employee's work product or presentation to determine whether the training was effective. This mixture of support and accountability has helped OGE to foster both a performance culture and continuous learning.

<u>Performance Highlights</u>

In fiscal year 2014, all OGE employees participated in the OGE Employee Development Program, as described above. In addition to the EDP, OGE increased employee knowledge through information sharing and collaboration by conducting bi-monthly employee meetings called Issue Forums. Staff met at these forums to discuss a wide range of ethics issues, including in-depth analyses of specific ethics rules and regulations. These forums promoted internal

communication and cross-functional knowledge sharing among employees at all levels and from all divisions. OGE also developed a Persuasive Speaking Community of Practice that met twice a month to allow participating employees to improve their oral communication skills. In addition to these significant investments in internal opportunities for professional development, OGE supported its employees enhancing their knowledge and skills by sponsoring their participation in external training programs. These programs included classes at the Graduate School USA and the Treasury Executive Institute, as well as events hosted by the federal performance, legal, IT, and communications communities.

Finally, OGE redesigned and implemented a new training program for recently-hired OGE attorneys who engage in the practice of ethics law and policy. New attorneys received summaries of key statutory and regulatory authorities along with OGE advisory opinions, case law, Office of Legal Counsel memoranda and relevant exercises to apply each of the authorities. Attorneys read the materials, prepared the exercises and participated in a series of small, intensive-discussion group meetings with OGE instructors. This rigorous combination of independent study followed by small group instruction and discussion gave the attorneys a deeper understanding of the key authorities upon which to build as they gain more on-the-job experience. It also better prepared them to effectively perform their duties of providing advice to agency ethics officials on an array of topics.

Performance Goal: In fiscal year 2014, OGE modified the EDP based on feedback received from employees who participated in the pilot. As a result of their feedback, OGE did not use a measure of confidence to determine if each employee successfully met their professional development goals. Rather, each employee made a commitment to carry out planned activities and participate in the measurement of progress toward the objective. Employees tied their professional development goals to OGE's strategic objectives. During the performance period, 95 percent of employees successfully completed their employee development plan. Moving forward, OGE is working on a common performance standard that will be used across the agency in fiscal year 2015.

Planned Work for Fiscal Years 2015 and 2016

In fiscal year 2015, OGE will incorporate the requirements of the EDP into employees' performance standards. In this way, OGE will solidify its commitment to continuous employee learning and professional development. OGE will also continue to identify agency knowledge and skill gaps, and will use the EDP to train employees to fill those gaps. OGE will also continue to provide significant internal and external training and development opportunities to its employees. OGE will continue to hold regular meetings for employees within the agency to share information and to develop and improve their knowledge and skills. These actions collectively ensure that OGE and its employees will be able to offer the highest quality products and services to its stakeholders.

Management Objective 4.2: Transform the way OGE conducts business through process improvement

Performance Highlights

Created standard operating procedures

In an effort to work smarter, in fiscal year 2014, OGE continued to review its processes and procedures for ways to make improvements in programs that both support the ethics community and OGE's internal operations. OGE continued to streamline and standardize internal processes, as well as implement new technology solutions. In fiscal year 2014, OGE developed or updated 20 standard operating procedures. For example, OGE revised its procedures to consolidate the responsibilities of intake, assignment, and tracking of incoming public financial disclosure reports into a single administrative assistant position. The new procedure has allowed OGE to maintain much closer monitoring of reviewer progress, provide a detailed weekly update to the Director, and assign reports to reviewers more quickly.

Additional examples of key new or revised procedures and processes include: a procedure to facilitate consultations between Desk Officers and Attorneys in the Ethics Law and Policy Branch (ELPB) on substantive questions from ethics officials to fully utilize the work performed by both Desk Officers and ELPB Attorneys and to accurately and timely advise ethics officials, an updated Legislative Team Program Guide and Bill Tracking system that resulted in new efficiencies and a paperless process, and an updated process for approving requisitions that builds in additional internal controls and tracking to ensure that OGE remains fiscally responsible.

Performance Goal: OGE exceeded its performance goal to create or revise four standard operating procedures for key agency programs by 20.

Conducted a self-assessment of OGE's ethics and Equal Employment Opportunity programs

OGE encourages all agencies to regularly assess their ethics programs. In fiscal year 2014, OGE conducted a self-assessment of its own ethics program and as a result, updated confidential filer designations and conducted surveys to better tailor its annual ethics training to address areas of relevance to its employees. OGE also conducted a review of its Equal Employment Opportunity (EEO) program to ensure that OGE meets EEO program requirements.

Launched new technology solutions

OGE completed several IT initiatives in fiscal year 2014, such as updating its phone system and replacing antiquated IT equipment. Of particular note, OGE hired an experienced developer to create new web applications and automated tools to improve OGE efficiency. These

web applications and automated tools enable OGE to conduct business with greater efficiency and effectiveness. For example, OGE developed an application for managing logistics for the 2014 National Government Ethics Summit, significantly improving resource-allocation decisions. In addition, OGE is automating and making paperless additional processes such as purchase card approval and transactions, organizational accomplishments, ethics agreements compliance, and online training.

In fiscal year 2014, OGE also began developing a new mechanism for collecting required information such as agency travel reports and annual questionnaires. OGE will deploy a public-facing web server that will permit the electronic submission of data to OGE. This will streamline the data submission process for OGE customers by allowing them to enter required information directly through the website portal, rather than having to email it or use a third party collection platform. This new system will also save valuable staff time by importing data directly into OGE information management systems, eliminating the time required for document handling and reducing errors by ensuring that documents and data are properly stored. In addition, the new system will enable OGE to collect the information in a standardized way that may be easily sorted to better analyze agency data and make informed policy decisions.

Digitized agency records

In fiscal year 2014, OGE began to digitize its paper records and create an electronic file room to conserve resources and streamline OGE's records management process. This enabled OGE to more effectively maintain its records, conduct searches of its records, and timely dispose of records in accordance with the General Records Schedule.

Planned Work for Fiscal Years 2015 and 2016

In fiscal years 2015 and 2016, OGE will identify and review at least two processes in each of its four divisions, select at least one of these processes from each division for standardization and streamlining, develop and implement action plans for revising the processes, and deploy the revised processes. OGE will also continue to develop internal applications that streamline current processes and improve OGE's multiple data collection efforts. Improved data collection tools will enable OGE to better analyze data and make informed policy decisions for the executive branch ethics program. In addition, OGE will continue to convert paper records to electronic records to improve maintenance, searching, and disposal.

Maintaining a Culture of Performance

In fiscal year 2014, OGE bolstered its internal communications efforts through a variety of methods. OGE conducted quarterly "all hands" meetings with the entire OGE staff to discuss progress toward meeting its goals and to promote an understanding of OGE's priorities and direction. OGE also held regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities. OGE held supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

In addition to emphasizing internal communications, OGE took several other steps during fiscal year 2014 to maintain a culture of performance. For example, OGE published a new strategic plan covering fiscal years 2014 through 2018, with input from stakeholders in the executive branch ethics community, Congress, good government groups, and the general public. OGE also continued to support a variety of flexible work and telework schedules, with 93 percent of employees reporting they were satisfied with OGE's telework and 100 percent reporting that they were satisfied with OGE's alternative work schedules. Furthermore, OGE updated its Senior Executive Service performance management system and tied employee performance standards to OGE's strategic goals.

To evaluate its progress in maintaining a culture of performance, OGE participated in the executive branch-wide Federal Employee Viewpoint Survey in fiscal year 2014, achieving a 93 percent participation rate. OGE received over 90 percent positive ratings for its management review and evaluation of the organization's progress toward meeting its goals and objectives and for employees being held accountable for achieving results. In addition, the survey results show a 25 percent increase in employees reporting that their supervisor has talked with them about their performance.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2015 and 2016 through several initiatives. OGE will continue to track its progress toward annual performance goals by: holding quarterly all-hands meetings; conducting mid-year strategic objective reviews; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In addition, OGE will continue to support a variety of flexible work and telework schedules. To evaluate its progress, OGE will analyze results from the Federal Employee Viewpoint Survey.

Support of the President's Management Agenda

In support of the President's Management Agenda, OGE is committed to making information resources accessible, discoverable, and usable by the public. However, OGE does not create or collect data sets from which the public could derive the benefits of an Open Data format for manipulation to "fuel entrepreneurship, innovation, and scientific discovery." Rather, OGE performs its mission on a much lower data level (e.g., document level of PDF and basic tracking spread sheets). OGE has a policy of proactively and aggressively providing transparency and accessibility of data collected or created. Currently, releasable data from which the public could derive benefit is provided at the document level, available on the OGE website.

In further support of the President's Management Agenda, OGE continued to use the shared services of the Bureau of Fiscal Services for all of OGE's non-core administrative support services. OGE also worked toward reducing fragmentation, overlap and duplication, and smarter IT delivery through the development of *Integrity,* its electronic public financial disclosure filing system that will be available to all executive branch agencies free of charge. The system is described on page 27. OGE also took steps to improve its ability to make data driven decisions as discussed in Section V of this document on evidence and evaluation on page 47.

Section V – Evidence and Evaluation

OGE is committed to using evidence, evaluation, and data as tools to improve program outcomes. Figure 18 below identifies where in the performance plan relevant information related to these efforts can be found.

Most Significant Accomplishments in Fiscal Year 2014

- Program inspections (See page 12)
- Annual agency reports (See page 13-14)
- Electronic financial disclosure system (*Integrity)* (See page 27)

Highest Priorities Areas for Fiscal Year 2015

- Electronic financial disclosure system (*Integrity)* (See page 29-30)
- Customer satisfaction (See pages 10-11)
- Oversight of executive branch ethics program (See pages 16-18)

Plan for embedding evaluation and improvement in new or existing programs

- Electronic financial disclosure system (*Integrity)* (See page 29-30)
- Leadership support (See page 30-31)
- External outreach efforts (See page 37-39)

Implementation updates for OMB Memo M-14-06, "Guidance for Providing and Using Administrative Data for Statistical Purposes." In consultation with OMB, OGE and OMB jointly concluded that OGE does not have any non-public administrative data for purposes of M-14-06.

Figure 19: Evidence and Evaluation Initiatives

Section VI – Conclusion

OGE will use its fiscal year 2016 budget request to support the agency's important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business with impartiality by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in this justification for fiscal year 2014, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals. Further, as is amplified in this justification, OGE will employ its fiscal year 2016 resources to make significant strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program, contributing to the continuity of senior leadership in the executive branch, and promoting transparency of the executive branch ethics program, and its management goal of creating and promoting a culture of performance.

Appendix A – Fiscal Year 2015 and 2016 Performance Goals

OGE PERFORMANCE GOALS			
Strategic Goal 1: Advance a strong, uniform executive branch ethics program			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 1.1 *Interpret and advise on ethics laws, policies, and program management*	Legal and program advisories help ethics officials perform their job duties.	80%	80%
	Ethics officials believe OGE timely communicates ethics-related information.	Establish baseline	-
	OGE Desk Officer assistance helps ethics officials perform their job duties.	80%	80%
Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within established time frames.	90%	90%

Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	In cases in which OGE identifies program weaknesses, OGE's program review results in improvements in the agency's ethics program.	75%	75%
	Ethics agreement compliance occurs within the established time frame.	90%	90%
	OGE's electronic filing system has capacity to process financial disclosure reports.	Milestone: January 2015	-
	OGE's electronic filing system is processing financial disclosure reports.	Multiple Agencies	30% of public financial disclosure filers 25% of executive branch agencies
Strategic Objective 1.3 *Contribute to the professional development of ethics officials*	Ethics Officials use training products made available by OGE.	80%	80%
	After participating in an OGE training event, ethics officials better understand the subject matter presented.	90%	90%
	After participating in an OGE training event, ethics officials believe they can more effectively perform their job functions.	90%	90%

| Strategic Objective 1.4

Modernize and implement the ethics rules and regulations | Submit revisions to subparts B and F of the Standards of Ethical Conduct for Executive Branch Employees to DOJ and OPM. | Milestone: 2015 | - |

| **Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch** |||

	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 2.1 *Provide assistance to the President and the Senate in the nomination process of Presidentially-appointed, Senate-confirmed nominees*	Identifiable, substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination.	90%	90%
	OGE successfully resolves technical reporting issues in the financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination.	90%	90%

Strategic Objective 2.2 *Promote leadership support of the executive branch ethics program*	Agency leaders demonstrate support of the ethics program.	80%	85%
Strategic Objective 2.3 *Support succession planning in the executive branch ethics programs* .	Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.	Establish baseline	-

Strategic Goal 3: Promote transparency of the executive branch ethics program			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Strategic Objective 3.1 *Raise the visibility of the executive branch ethics program and OGE.*	Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program.	community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles	. community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles

Strategic Objective 3.2 *Ensure that ethics information is publicly available*	Ethics documents are posted online within established time frames.	80%	80%

Management Objectives			
	Performance Goal	Fiscal Year 2015 Target	Fiscal Year 2016 Target
Management Objective 4.1 *Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities.*	OGE employees participating in the Employee Development Program successfully complete their employee development plans.	Establish baseline	-
Management Objective 4.2 *Transform the way OGE conducts business through process improvement*	Create or revise standard operating procedures for key agency programs.	4	4

Changes to OGE's Performance Goals

The table above reflects OGE's addition of 4 new performance goals for fiscal years 2015 and 2016 and the removal of three performance goals that were used in fiscal year 2014. OGE reviewed its performance goals and changed them to more accurately capture the agency's current work priorities and to ensure that the goals are appropriately outcome oriented. The specific reason for each change is described below.

New Performance Goals Established for Fiscal Years 2015 and 2016

1. *Ethics Officials believe OGE timely communicates ethics-related information:* This performance goal was added to reflect OGE's priority to increase outreach efforts with the ethics community.

2. *Electronic filing system is processing financial disclosure reports:* This performance goal was added to more accurately reflect the targeted development of the electronic filing system in fiscal years 2015 and 2016.

3. *In cases in which OGE identifies program weaknesses, OGE's program reviews result in improvements in the agency's ethics program.* This performance goal was added to better capture the intended outcome of OGE's reviews of agency ethics programs.

4. *Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.* This performance goal was added to capture OGE's overall efforts to support succession planning in the executive branch ethics program.

Performance Goals No Longer in Use for Fiscal Years 2015 and 2016

1. *Ethics officials believe OGE timely addresses new ethics issues:* This performance goal was broadened in new performance goal 1 above because OGE shifted its focus toward whether ethics officials believe OGE is timely communicating on all issues, not just new or emerging issues.

2. *Ethics officials increase their confidence level in one or more skill areas after attending OGE's Intensive Curriculum in Ethics:* This goal was removed because it narrowly focused on a single program aimed a small subset of ethics officials.

3. *Agencies subject to program reviews implement recommendations for improvements and acknowledge the identification of broader systemic weaknesses by OGE.* This performance goal was replaced with new performance goal 3 above to better capture the intended outcomes of OGE program reviews.

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Explanatory Notes,
ANNUAL Performance Plan &
Performance Report

UNITED STATES OFFICE OF
GOVERNMENT ETHICS
★
Preventing Conflicts of Interest
in the Executive Branch

www.oge.gov

OGE
MISSION STATEMENT

The United States Office of Government Ethics (OGE) provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE's mission directly supports the President's goal of responsibly governing the nation.

Contents

UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – 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 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 Principles of Ethical Conduct for Government Officers and Employees is, "[p]ublic service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain." Public servants are expected to make impartial decisions based on the interests of the public when performing their job duties. OGE, in concert with agency ethics practitioners throughout the executive branch, ensures that employees fulfill this great trust.

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the more than 4,500[i] ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and provides technical assistance to state, local, and foreign governments and international organizations.

OGE's greatest resource is its multidisciplinary staff of attorneys, ethics and finance experts, and support personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate. As shown in the organizational chart in Figure 1, in addition to the Office of the Director, OGE comprises four divisions that work in concert to carry out OGE's mission.

Figure 1: OGE Organizational Chart

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[i] The decline in the number of ethics officials reported is due to OGE rewording a question in its Annual Agency Ethics Program Questionnaire. The number previously included any individual who worked in the ethics program either exclusively or non-exclusively. The number now includes only individuals who performed two or more hours of ethics program duties per week.

Long-Term Strategic Goals

When government decisions are made free from conflicts of interest, the public can have greater confidence in the integrity of executive branch programs and operations. The three strategic goals of OGE's strategic plan for fiscal years 2014 through 2018 – uniformity, continuity, and transparency – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. See Figure 2. OGE's budget priorities for fiscal year 2017 support achievement of these strategic goals.

In order to develop meaningful strategic goals, OGE consulted with internal staff, Congress, executive branch ethics officials, non-governmental organizations, and the general public. OGE incorporated feedback received from these groups into its goals. The daily work of OGE is driven by the strategic objectives and performance goals established under each of the overall strategic goals set forth below.
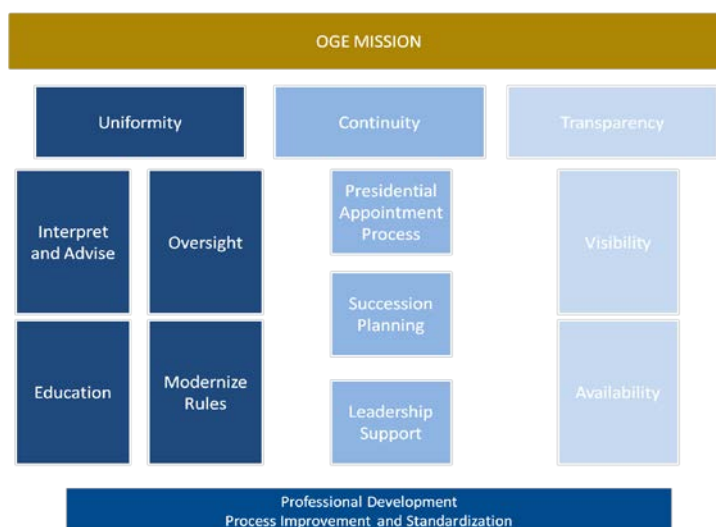
Figure 2: OGE's Fiscal Year 2014 – 2018 Strategic Goals

1. Advance a strong, uniform executive branch ethics program: OGE interprets and advises on ethics laws, policies, and program management issues; holds executive branch agencies accountable for carrying out effective ethics programs; contributes to the professional development of ethics officials; and modernizes and implements the ethics rules and regulations.

2. Contribute to the continuity of senior leadership in the executive branch: OGE provides assistance to the President and the Senate in the nomination process for Presidential appointees requiring Senate confirmation; supports succession planning in executive branch ethics programs; and promotes leadership support of the executive branch ethics program overall.

3. Promote transparency of the executive branch ethics program: OGE raises the visibility of the executive branch ethics program and ensures that ethics information is publicly available to increase public confidence in the integrity of governmental decision-making.

Starting on page 10, this document describes the specific work OGE will undertake in fiscal years 2016 and 2017 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward the achievement of its strategic objectives.

Section II – 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 Stop Trading on Congressional Knowledge Act of 2012, 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, $16,090,206."

Budget Request Overview Narrative

OGE requests $16,090,206 for fiscal year 2017 to support the agency's important mission, including the vital work OGE performs as part of a Presidential transition. OGE's workload is expected to triple with the election of a new administration in 2016. OGE staff and systems must be adequately resourced to work in concert to ensure that Presidentially appointed, Senate-confirmed (PAS) nominees are free of financial conflicts of interest. OGE must also be able to ensure that nominee financial disclosure reports are properly reviewed and promptly delivered to the U.S. Senate in order to fill critical leadership vacancies, including those directly impacting national security. This work is crucial at a time when the nation is vulnerable based on the number and nature of high-level positions that are vacant. OGE requires its full fiscal year 2017 request in order to deliver this highly effective, mission-critical work.

OGE requests $16,090,206 in order to ensure that the necessary financial disclosure expertise and systems are available to support the Presidential transition. This request includes resources to further OGE's efforts to reduce fragmentation, overlap, and duplication, through enhancements to its executive branch-wide electronic public financial disclosure system, *Integrity.*[ii] Specifically, OGE needs the resources to support its full-time professional staff as well as $192,000 to hire outside experts on a temporary basis. These experts will provide surge capacity during the period of most critical need for the new administration to fill key positions. OGE also must invest in $284,000 worth of crucial enhancements to *Integrity*. OGE's system will be used by the highest-level incoming PAS nominees to comply with their financial reporting requirements as well as by non-PAS public filers occupying leadership positions throughout the executive branch. In summary, OGE requests $16,090,206 in order to effectively serve its vital role in the Presidential transition in fiscal year 2017 and to continue to successfully respond to the permanent increase in its workload that has resulted from the enactment of the Stop Trading on Congressional Knowledge Act (STOCK Act). OGE's request is detailed more fully below.

[ii] See page 35-36 for more details about how investment in *Integrity*, OGE's executive branch-wide electronic public financial disclosure filing system, represents OGE's continued efforts to increase effectiveness and reduce fragmentation, overlap, and duplication per OMB Memorandum M-15-11.

Funding of $16,090,206 will enable the agency to play its vital role in the Presidential transition

Funding OGE at $16,090,206 will ensure that OGE staff and systems are sufficiently resourced to support OGE's important role in the smooth transfer of power from one Presidential administration to the next in the 2016 post-election period. A very significant increase in volume of financial disclosure filings by PAS nominees will occur in fiscal year 2017 and beyond, following the 2016 Presidential election. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest. OGE has prudently invested in its staff, materials, training, and systems in preparation for this high-volume, mission-critical work. OGE is requesting the funding necessary in order to successfully carry out its role.

OGE will need its full complement of staff resources to support executive branch agency ethics officials in their own preparation for the post-election period. OGE's staff and a handful of others are the foremost experts on executive branch nominee financial disclosure. OGE uses a matrix approach to staffing the nominee report review program, particularly during peak workload periods. This approach ensures both short-term capacity for OGE's critical PAS nominee work in the post-election period and long-term support for OGE's overall core mission work. OGE will also supplement this staff for temporary periods with two experts during the periods of highest demand. Access to expert permanent and temporary staff will ensure OGE can deliver highly accurate and rapid identification and remediation of PAS nominees' potential conflicts of interest. OGE's request includes funding of OGE's current staffing plan and $192,000 to hire temporary experts at times of peak PAS nominee volume.

This request will provide the resources necessary to support training and access to key job tools for OGE and executive branch-wide ethics staff. As the supervising ethics office, OGE is responsible for conducting training for nominee financial disclosure reviewers at agencies throughout the executive branch. Particularly during a time of Presidential transition, OGE must enhance its program offerings to provide legal guidance and training to executive branch agencies regarding restrictions on seeking employment and post-government employment. This work during a Presidential transition requires intensive preparation through significant internal and agency training, new guidance, resources and materials, and early contact with the transition coordinators for the Presidential campaigns. This request also ensures OGE's ability to fully undertake its oversight of agency ethics programs by permitting travel for program reviews outside the Washington D.C. area.

As noted above, *Integrity* is expected to reach a peak in its capacity and the highest visibility in fiscal year 2017, and must be adequately resourced to meet the expected demands on the system. The system is named *Integrity* because it is more than a new information technology system. For incoming and current top leaders in federal service, it serves as both a critical tool for identifying financial conflicts of interest and a mechanism to educate these leaders about executive branch ethics. In fiscal year 2017, OGE expects that non-PAS public filers at over 135 executive branch agencies will use the system to accomplish some portion of their annual, termination, and transaction financial disclosure reports. The 2017 transition will add significantly to this filing load. The influx of new PAS nominees will rely on OGE's system as they enter into the nation's top leadership positions across the executive branch.

OGE will need adequate resources to support this increase in *Integrity's* capacity and to continue the process of enhancing system functionality, as well as to address both anticipated and unanticipated fixes that necessarily arise for all information technology (IT) systems. To that end, at the requested funding level, OGE will undertake system enhancements such as upgrading the wizard functionality to allow autocomplete and enhance capability to capture asset parent/child relationships; upgrading the notice history to track all notices issued regarding a report; simplifying the display of public annotations and notices on a report; adding reviewer flags; adding a tracking system for reports that do not need to be filed or are filed outside of *Integrity*; developing a data importer to allow agencies to import data filed using the Excel version of a 278e into *Integrity*; and improving workflow and management status reports. For *Integrity*, as for all IT systems, such iterative improvements, some of which have been identified through user testing and feedback, must be employed to ensure a continuously improving product even after deployment. OGE anticipates that planned enhancements to *Integrity* will play an important role in streamlining the administrative processing of nominations during the Presidential transition. At the same time, *Integrity* must retain capacity to continue to respond to changing requirements, particularly those that involve enhancing security to address evolving IT security threats.

Conclusion

OGE respectfully requests fiscal year 2017 funding of $16,090,206 to conduct its important mission work, including undertaking its vital role in the rapid and effective transition of power from one administration to the next after the 2016 Presidential election.

Budget Object Class Table

A. Budget Request by Object Classification

The object classification table set forth below summarizes OGE's request.

Table: Budget Request by Object Classification in Thousands of Dollars (000's)

	Object Class	2015 Enacted	2016 Enacted	2017 Requested
1.1	Salaries	$8,517	$8,747	$8,873[a]
12.1	Benefits	$2,394	$2,450	$2,728
21.0	Travel	$32	$21	$50[b]
22.0	Transportation (Freight)	$6	$6	$2
23.1	Rental Payments to GSA	$1,252	$1,450	$1,323
23.2	Rental Payments to Others	$0	$0	$0
23.2	Communications and Utilities	$129	$121	$125
24.0	Printing and Reproduction	$10	$65[c]	$19
25.0	Other Services	$2,317	$2,715	$2,829[d]
26.0	Supplies and Materials	$109	$115	$100
31.0	Equipment	$654	$52	$41[e]
99.0	Subtotal	$15,420	$15,742	$16,090
99.0	Reimbursable	725	725	725
99.0	Totals	$16,145	$16,467	$16,815

[a] Reflects funding for OGE's current staffing plan and for temporary expert assistance to enable OGE to undertake its important role in the Presidential transition: ensuring that Presidentially-appointed, Senate-confirmed (PAS) nominees are free of financial conflicts of interest and their financial disclosure reports are properly reviewed and promptly delivered to the U.S. Senate in order to fill critical leadership vacancies.

[b] Reflects costs for travel to conduct necessary on-site compliance reviews of agencies headquartered outside of the Washington D.C. area or with significant regional presences.

[c] Reflects costs to publish a significant number of OGE regulations being modernized in part to reflect statutory changes made by the STOCK Act and to publish materials for OGE's role in the 2016 Presidential transition.

[d] Reflects necessary funding for enhancements, fixes, and responsive security measures for OGE's executive branch-wide electronic public financial disclosure system, *Integrity*, on which the highest-level Presidential nominees will rely to file their required reports during the Presidential transition.

[e] Reflects complete, successful replacement of agency-wide information technology equipment, including network servers, updated phone system, and HVAC system during fiscal years 2014 and 2015, resulting in significant reduction of funding necessary for equipment in fiscal year 2016 and 2017.

Section III – Fiscal Year 2015 Performance Report and Fiscal Year 2016 and 2017 Performance Plan

OGE's past and planned work reflects its commitment to fulfilling the vital need to prevent conflicts of interest in the federal executive branch. 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 its progress on its performance goals.

Organized by strategic goal and objective, this section highlights both OGE's major accomplishments and progress toward achieving its strategic objectives in fiscal year 2015 as measured by its performance goals.[1] This section also describes OGE's planned work for fiscal years 2016 and 2017. Information on how OGE will measure its progress toward achieving its strategic goals in fiscal years 2016 and 2017 can be found in Appendix A.

Strategic Goal 1: Advance a strong, uniform executive branch ethics program

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE has identified four strategic objectives. These objectives are: (1.1) interpreting and advising on ethics laws, policies, and program management; (1.2) holding executive branch agencies accountable for carrying out an effective ethics program; (1.3) contributing to the professional development of ethics officials; and (1.4) modernizing and implementing the ethics rules and regulations.

Strategic Objective 1.1: Interpret and advise on ethics laws, policies, and program management

A uniform legal framework ensures that all executive branch employees are held to the same standards. Through interpreting and advising on the ethics laws, regulations, and policies, OGE assists agency ethics officials in providing consistent and accurate counseling to their employees in order to prevent or remedy conflicts of interest.

Performance Highlights

Assisted and supported agency ethics officials through OGE's Desk Officer program

OGE is the supervising ethics office for a decentralized ethics community comprised of thousands of ethics officials in over 130 agencies across the executive branch. OGE's Desk Officer program serves as a vital communications link to this ethics community. OGE's Desk Officers assist agencies in resolving difficult ethics issues requiring expertise that only the supervising ethics office can provide. In fiscal year 2015, OGE Desk Officers responded to
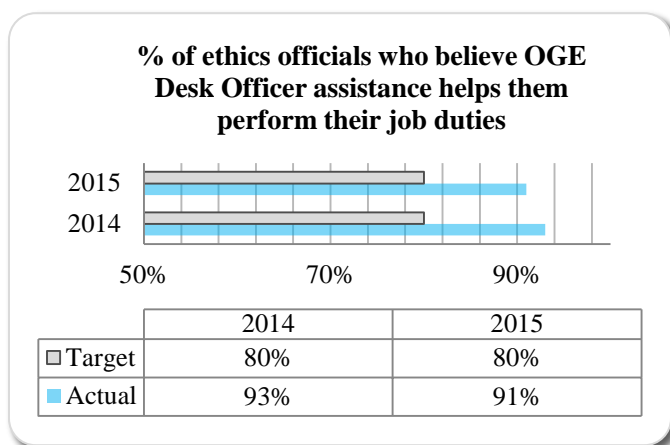
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[1] The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual agency ethics program questionnaire, Google Analytics, and an annual survey of ethics officials to assess satisfaction with OGE's services and products.

approximately 1,800 requests for assistance from agencies. Desk Officers also proactively engaged with agency ethics offices to provide expertise and support, and raise awareness of the range and availability of OGE's services.

Also in fiscal year 2015, in addition to broadcasting important information to ethics officials through its website, listserv, and MAX.gov, OGE continued to leverage technology by sending proactive, targeted emails to agencies regarding real-time, agency-specific needs. For example, OGE used its Agency Information Management System (AIMS) to identify agencies that recently or frequently asked questions about the ethics regulations governing seeking and negotiating for outside employment. Desk Officers then forwarded notice to those specific agencies regarding an upcoming course covering those particular ethics regulations. Such targeted emails ensure that agencies are aware of training opportunities relevant to their current needs.

% of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties

	2014	2015
☐ Target	80%	80%
■ Actual	93%	91%

Figure 3: Desk Officer Assistance

Performance Goal: OGE surveyed ethics officials who requested assistance from OGE's Desk Officers during fiscal year 2015 to measure the performance of its Desk Officer program. 91 percent of survey respondents indicated that Desk Officers helped them to perform their job duties. Figure 3 shows that OGE exceeded its target on this goal.

Provided agencies with important legal and program guidance

In addition to providing day-to-day assistance through the Desk Officer program, OGE issues advisories to disseminate critical information to the executive branch ethics community and to promote uniform interpretation of ethics laws, regulations, and policies. Advisories are an integral component of the body of interpretive and programmatic guidance that executive branch ethics officials rely on daily.

In fiscal year 2015, OGE issued 16 advisories. Figure 4 highlights some of OGE's key legal advisories. OGE chose to issue advice on these and other topics based on feedback from

OGE Legal Advisory Highlights

- Reference to Official Title and Position by Employees Affiliated with Private Organizations in Their Personal Capacity (LA-14-08)
- Free Attendance at Speaking Engagements and Widely Attended Gatherings (LA-15-02)
- The Standards of Conduct as Applied to Personal Social Media Use (LA-15-03)
- Treatment of Gift Cards under the $20 De Minimis Gift Exception (LA-15-04)
- Application of the Employee Benefit Plan Exemption (LA-15-06)
- Exemption for Diversified and Sector Real Estate Funds (LA-15-09)
- The 2014 Conflict of Interest Prosecution Survey (LA-15-10)

Figure 4: Highlights of OGE's Key Legal Advisories

agency ethics officials about questions they received from employees. For example, OGE addressed emerging ethics issues such as the use of social media by federal employees in the context of their obligations under the Standards of Conduct. OGE's recent legal advisory on this topic was very well received and covered by a number of media sources.

In addition to these legal advisories, OGE issued timely and important program advisories. For example, OGE issued a comprehensive advisory addressing both the implementation of *Integrity*, its new electronic public financial disclosure filing system, and the launch of a new public financial disclosure report form, OGE Form 278e. These subjects are discussed in more detail on pages 33 and 34. In addition, OGE issued an advisory on deadlines and procedures for the 2015 filing cycle for annual financial disclosure reports, as well as an advisory providing procedural guidance to Presidential candidates with regard to their financial disclosure obligations.

In developing these advisories, OGE continued to leverage the expertise of agency ethics officials by consulting with key members of the ethics community. OGE solicited their views on the subjects of planned advisories, convened focus groups, and obtained their feedback on draft advisories. With this community input, OGE increased its ability to effectively mitigate risks, reduce inconsistencies in the application of ethics laws, and address current issues confronting executive branch ethics officials. In addition, anecdotal feedback from agency ethics officials reflects that OGE's approach of involving them in the development of these advisories over the past few years has increased their satisfaction with both the process and the advisories produced.

Performance Goal: In fiscal year 2015, an OGE survey of the ethics community revealed that 94 percent of respondents felt that advisories helped them perform their job duties. The value and use of these advisories is also demonstrated by OGE's website analytics, which show that the legal advisories page was the third most viewed page of OGE's website.

Engaged ethics officials to share information and shape policy

In addition to integrating feedback of ethics officials on advisories, OGE continued its efforts to engage more directly with members of the government ethics community and to timely disseminate information to them in order to address existing and emerging ethics issues. To support this effort, OGE used the MAX.gov platform, a government-wide collaboration, data collection, and information-sharing site, to provide relevant and timely information to ethics officials. Through MAX.gov, OGE provided advance notice of upcoming OGE guidance and events, as well as updates on relevant ethics-related legislative proposals. In addition, OGE used an ethics email listserv and its website to provide timely and relevant information to the ethics community.

In fiscal year 2015, OGE organized numerous meetings, conference calls, focus groups, and webinars with senior executive branch ethics officials to inform and collaborate. For example, OGE's Director continued the practice of holding live quarterly meetings for the most senior agency ethics officials, with telephone recaps for those who could not attend live. At these meetings, which were frequently attended by over 100 ethics officials, OGE's senior leaders shared information critical to managing an effective ethics program, encouraged discussion of

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current ethics issues facing the executive branch, and consulted with agency ethics officials regarding contemplated changes in OGE's policies and regulations. For their part, agency ethics officials attending these meetings shared with OGE information about their priorities and needs, which led OGE to adjust various activities in order to increase the effectiveness of its support to the executive branch ethics community. In response to OGE's annual survey of ethics officials, 90 percent of surveyed ethics officials indicated that they felt more informed as a result of attending these quarterly meetings.

Performance Goal: OGE found that 89 percent of respondents to the annual survey of ethics officials believe OGE timely communicates ethics-related information.

Assisted other key stakeholders

In addition to assisting executive branch ethics officials, OGE responded to requests for assistance from other key stakeholders, including Congress. OGE serves as the legislative liaison on behalf of the entire executive branch ethics program to build congressional understanding of the executive branch ethics program and to inform congressional oversight and any future revisions to ethics laws. Notably, OGE responded to 26 congressional requests for detailed, technical assistance on executive branch ethics issues and draft legislation on topics including impartiality and misuse of position, post-government employment, and financial disclosure. Additionally, OGE provided requested expertise and support to the Government Accountability Office on three of its substantive reviews. OGE also represented the executive branch ethics community by providing ethics expertise on 34 requests for comments on legislative materials and 44 requests for comments on Executive Orders and Presidential Memoranda from the Office of Management and Budget (OMB) through the Legislative Referral Memorandum (LRM) process. OGE achieved a 100 percent success rate for timely responding to all of the requests it received.

OGE also provided substantive assistance to outside entities such as associations, non-governmental organizations, attorneys, and private enterprises, that interact with executive branch agencies and employees. For example, in fiscal year 2015, OGE provided technical assistance regarding financial disclosure and post-government employment to a non-profit organization on its report discussing various aspects of the Presidential appointment process for those nominees requiring Senate confirmation. As a result of OGE's input, the organization agreed to make substantial changes to the report and thanked OGE for its assistance. This type of assistance helps ensure accurate reporting of the ethics rules to further promote understanding of those rules. For additional information on the numerous requests OGE receives from outside entities see page 44.

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will continue to provide quality Desk Officer services, timely legal and programmatic guidance, and effective assistance to key stakeholders. OGE will also continue to share information and to create opportunities to engage with the ethics community. Key highlights of OGE's planned work are described below.

Assist and support agency ethics officials through OGE's Desk Officer program

OGE Desk Officers will continue to provide vital support to agency ethics officials so they can provide uniform and effective ethics guidance to the more than two million federal employees in the executive branch who serve the American people. Desk Officers will continue to provide timely, expert advice in applying the ethics laws and regulations, and to disseminate the most up-to-date ethics information. Desk Officers also will meet personally with agency ethics officials in order to strengthen their professional relationships. OGE will use AIMS, its agency assistance tracking system, to become even more data driven in its decision-making and to maximize the reach of its limited resources. For example, OGE will mine its data sets to identify agencies in need of special outreach. OGE plans to cross-reference training registrations, volume of questions asked, and registrations from quarterly DAEO meetings to identify agencies that infrequently seek OGE support. OGE will analyze this data and develop outreach to ensure that these agencies are taking the fullest advantage of OGE's resources and support.

Provide timely legal and program guidance

Providing timely legal guidance is necessary to keep ethics officials up to date on current ethics issues and changes in ethics law and policy. This support enables them to reduce risk and more effectively counsel their employees. In addition to publishing legal advisories as new ethics issues arise, in fiscal year 2016, OGE plans to issue a legal advisory on the application of ethics laws to student interns and student volunteers and to update its guidance on the issuance of certain conflict of interest waivers. OGE also plans to issue legal advisories that will address topics of particular relevance to the upcoming Presidential transition. For example, OGE plans to issue an advisory on the post-government employment rules, which will include FAQs that ethics officials can discuss with, and distribute to, their departing employees. Through written guidance, in-person meetings, social media, MAX.gov, and its official website, OGE will also provide direction on program management issues, such as ethics program administration and financial disclosure.

Engage ethics officials and other external stakeholders to share information and shape policy

OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date ethics information. OGE will continue using MAX.gov to provide agencies with advance notice of upcoming OGE guidance and events, as well as updates on relevant legislative proposals. In addition, OGE will continue to post advisories and other guidance in a searchable format on its website, and will provide notice of new guidance via its listserv and MAX.gov. OGE will also continue to hold quarterly meetings with senior agency ethics officials and to convene additional meetings and conference calls to share information relevant to managing an effective ethics program, to discuss current ethics issues facing the executive branch, and to obtain information from stakeholders in the government ethics community.

In addition, OGE will continue to consult with agency ethics officials, non-governmental organizations, academic experts, and other stakeholders when developing new policy. Specifically, OGE will continue its practice of seeking input from the ethics community as part of the process of drafting its legal advisories. OGE will also continue to provide advice and

assistance in response to requests from a variety of stakeholders outside of the executive branch ethics community, such as Congress, professional associations, non-governmental organizations, academia, state and local governments, and employee groups, to build a better understanding of the executive branch ethics program.

Strategic Objective 1.2: Hold executive branch agencies accountable for carrying out an effective ethics program

In performing its oversight function, OGE ensures that executive branch agencies are held accountable for carrying out effective ethics programs. Through its program review, data collection, and financial disclosure review activities, OGE evaluates the processes and systems in place at the agency level to ensure consistent and successful ethics program management.

Performance Highlights

Reviewed agency ethics programs for compliance

Through ethics program reviews — plenary reviews and inspections — OGE evaluates agency ethics programs. Plenary reviews entail a thorough analysis of the agency's implementation of all basic requirements of an ethics program, including an examination of materials such as financial disclosure reports and advice and counseling provided by the agency. Inspections are targeted examinations of key elements of an

> *"The Truman Foundation thanks the Office of Government Ethics for the opportunity to discuss and improve our ethics practice. We consider ethical behavior a cornerstone of our work with future public servants and appreciated sharing that mission with OGE. We concur in the findings of the report."*

agency's ethics program and are designed to identify systemic risks. Because inspections focus on select program elements, OGE is able to expand the reach of its resources to increase the number of agencies its staff can evaluate in a given year. Moreover, if an inspection of an agency generates data suggesting potential systemic risks, OGE may schedule the agency for a more expansive plenary review to evaluate its compliance. The expanded capacity provided by the inspection process increases OGE's onsite presence at federal agencies and, as a consequence, increases OGE's capacity to detect systemic risks before problems arise. Plenary reviews of agency ethics programs continue to be an important component of OGE's statutorily-mandated oversight activities.

Where necessary, OGE provides recommendations for program improvement and suggests remedial actions to correct deficiencies. Evaluating agency ethics programs and following up on agency implementation of review recommendations helps to hold agency leadership accountable for administering compliant ethics programs. In fiscal year 2015, OGE conducted 57 program reviews and published a total of 44 program review reports. OGE also conducted 22 follow-up reviews and published 15 follow-up review reports.

Issued recommendations to improve compliance

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation. A recommendation directs the agency to take actions necessary to correct the deficiency. In fiscal year 2015, OGE issued 122 recommendations through program reviews, both plenary reviews and inspections.

For example, during a review of an agency's ethics program, OGE identified that only 84 percent of the sample set of new entrant non-PAS public financial disclosure reports that OGE's program reviewers examined had been filed by the applicable deadlines. To address this recommendation, the agency ethics program worked with the agency's Office of Human Resources to develop a system for ensuring the ethics office received timely notification of staffing changes that resulted in an employee moving from a non-filing position into a position requiring the filing of a new entrant OGE Form 278. As a result of the agency's implementation of this new policy, OGE found during its follow-up review that 91 percent of a sample set of new entrant non-PAS public financial disclosure reports had been filed by the applicable deadlines. In another instance, an agency's initial employee orientation and annual ethics training did not include all of the content required by regulation. In response to

OGE's findings, the agency updated its training materials to include all required content. As a result of this improvement, the agency's employees are now more fully aware of their ethical responsibilities.

Performance Goal:
OGE exceeded its target for the percent of program reviews, in cases in which OGE identified program weaknesses, that resulted in improvements in the agency's ethics program.

Improved programs by sharing model practices

In addition to identifying ethics program deficiencies or vulnerabilities, program reviews also provide the opportunity for OGE to identify model practices that agencies have instituted to manage their ethics programs. During program reviews, OGE shares these model practices with other agencies to use as tools for enhancing their programs. For example, during a recent program review, OGE shared with an agency model practices for effectively tracking employees' completion of annual ethics training. As a result, the agency was able to discernibly improve its tracking of training by implementing the practice OGE had shared.

% of program reviews, in cases in which OGE identified program weaknesses, that resulted in improvements in the agency's ethics program

	2015
☐ Target	75%
☐ Actual	89%

Figure 5: Program Review Recommendations

Collected and analyzed program data collected from executive branch agencies

OGE annually collects data from each of the more than 130 executive branch agencies regarding their programs. Agency responses to OGE's information requests give OGE a snapshot view of each agency's ethics program, and the compiled data provides OGE with an overview of the entire executive branch ethics program. In fiscal year 2015, OGE administered its Annual Agency Ethics Program Questionnaire (Annual Questionnaire) using a new electronic application it developed specifically for collecting the Annual Questionnaire data. This application significantly improved OGE's ability to analyze the data and made the data collection process more efficient. OGE also surveyed all executive branch agencies in fiscal year 2015 regarding their administration of the President's Executive Order on Ethics Commitments by Executive Branch Personnel (Executive Order 13490), and was able to confirm branch-wide compliance.

In fiscal year 2015, OGE continued to share key highlights from its Annual Questionnaire with ethics officials and the public (for more information see page 48). Having access to this data allowed ethics officials to compare aspects of their programs with those of other agencies, including how best to allocate ethics program resources. OGE also issued its sixth annual report on agencies' administration of Executive Order 13490. OGE reported that during calendar year 2015, agencies successfully administered the Ethics Pledge and that all Presidentially-appointed,
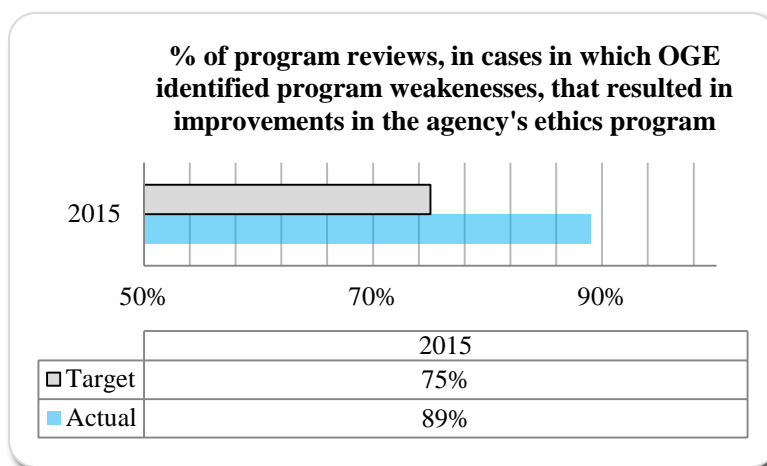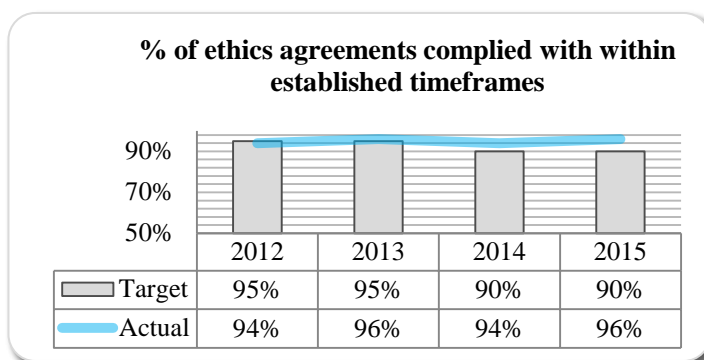
Senate-confirmed (PAS) officials who were required to sign the Ethics Pledge in 2015 had done so. OGE made both the Annual Questionnaire data and the Ethics Pledge report available to the public on its official website. This program data helps the public gain a better understanding of the scope and impact of the executive branch ethics program.

Monitored agency leaders' compliance with their ethics agreements

OGE works to ensure that executive branch leaders who are PAS officials remain free from conflicts of interest after taking office. OGE identifies and resolves potential conflicts of interest on the part of Presidential nominees by establishing written ethics agreements with them prior to confirmation. OGE then monitors their compliance with their ethics agreements through the collection and review of documentation provided by agency ethics officials. To improve monitoring and reduce the administrative burden of this tracking, OGE issued a legal advisory in the first quarter that provided guidance on the process for ensuring and documenting compliance with ethics agreements. Internally, OGE also developed and launched a new tracking system that sends automated reminders and produces progress reports. Of particular note, the tracking system was designed to pull data from OGE's new Financial Disclosure Tracking System, FDTS (see page 19), thereby increasing accuracy and reducing duplication of effort.

Performance Goal: In fiscal year 2015, 104 PAS appointees were required to document their timely compliance with their ethics agreements. Agency ethics officials reported that 96 percent of these appointees complied with their ethics agreements within required timeframes.

% of ethics agreements complied with within established timeframes

	2012	2013	2014	2015
Target	95%	95%	90%	90%
Actual	94%	96%	94%	96%

Figure 6: Ethics Agreement Compliance

Reviewed the public financial disclosure reports of top officials

OGE also reviews the annual, termination, and transaction financial disclosure reports of PAS officials, as well as new entrant and other financial disclosure reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. For the third consecutive year, OGE continued to complete its reviews more efficiently than in the past. The timely review of these senior officials' reports helps ensure that they remain free from conflicts of interest. In fiscal year 2015, OGE reviewed 1832 public financial disclosure reports (new entrant, annual, termination, and periodic transaction reports). In fiscal year 2015, the average number of days between the receipt of a report and OGE closing the report (certified or filed uncertified) was 21 days, four days less than fiscal year 2014 (25), two days less than fiscal year 2013 (23), 64 days less than 2012 (85), and 184 days less than 2011 (205).
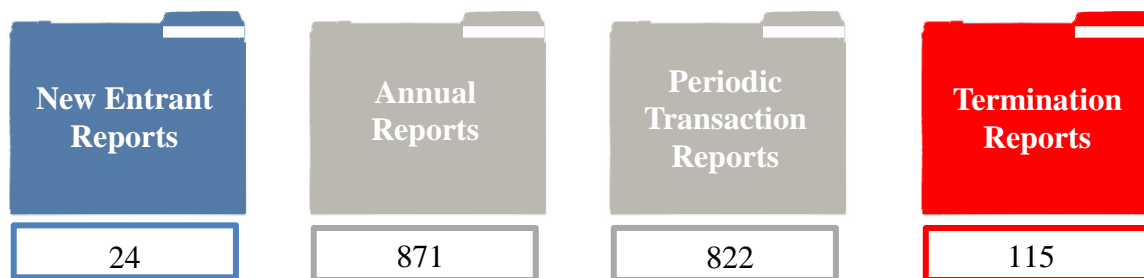
New Entrant Reports	Annual Reports	Periodic Transaction Reports	Termination Reports
24	871	822	115

Figure 7: Number of Financial Disclosure Reports Reviewed by OGE, by Type

The improvements in the financial disclosure program are a result of a multi-year effort to improve the program. The first phase, in 2013, focused on clearing a multi-year backlog of reports and conducting an inventory of the paper records. The second phase, in 2014, focused on reevaluating the scope of OGE's review process, implementing new review standards, creating a central file room, and developing standard operating procedures and internal controls for handling reports. The third phase, in 2015, focused on training more staff to review annual and termination financial disclosure reports to allow OGE to shift resources to other programs when needed while continuing to ensure that reports are timely reviewed. In this most recent phase, OGE also transitioned the financial disclosure program from a paper driven system to an electronic system. By digitizing the records, OGE reduced the level of resources needed to physically handle the paper folders (delivery, maintenance, retrieval, and storage) and eliminated the need for physical storage. OGE also created several new efficiencies in the review process. For example, the digitized files are searchable and accessible to more than one member of OGE's staff at a time, thereby shortening the time for review.
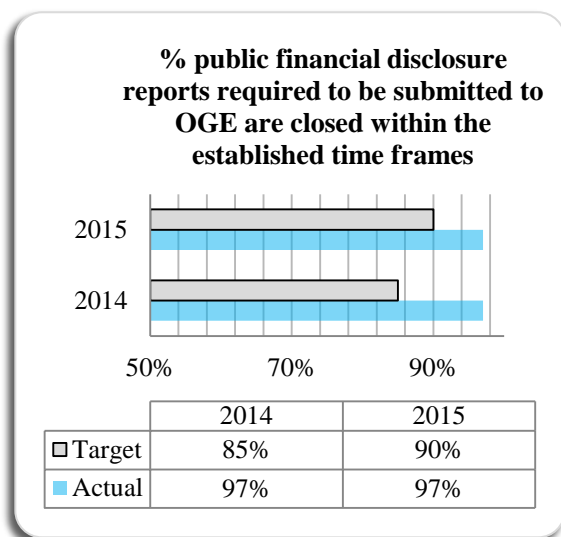
Redesigned Financial Disclosure Tracking System

% public financial disclosure reports required to be submitted to OGE are closed within the established time frames

	2014	2015
☐ Target	85%	90%
■ Actual	97%	97%

Figure 8: OGE Review of Financial Disclosure Reports

In fiscal year 2015, OGE began a redesign of its FDTS, a critical tool in its management of one of its core mission functions. This redesigned application will integrate the scanned financial disclosure forms and import data from the previous system. This will allow OGE staff to access financial disclosure records, reports, supporting documentation, and correspondence relevant to a filer through a single application. The redesigned application will include new reporting features that will improve OGE's processes for monitoring receipt, review, and retention of required public financial disclosure reports and related documents. Another enhancement to the system will be the inclusion of automated reminders to reviewers as well as enhanced data analysis capabilities. The new application is on track to be in use by early fiscal year 2016.

Performance Goal: In fiscal year 2015, OGE exceeded its target of completing reviews of public financial disclosure reports, including new entrant, annual, termination, and transaction

reports required to be submitted to OGE within 60 days of receipt. OGE achieved this result despite receiving seven percent more reports than in the prior year, an increase attributable to the growing number of periodic transaction reports filed pursuant to the STOCK Act. OGE has created new procedures and has devoted significant resources toward this performance goal since 2012. In fiscal year 2012, OGE completed 54 percent of its reviews within the 60 days of receipt compared to 97 percent in fiscal years 2015 and 2016. Moreover, the time for review remains significantly below the 60-day threshold, with reports taking on average only 21 days for review from the date of OGE's receipt.

Responded to agency requests to tailor their financial disclosure programs

OGE supports agencies' efforts to tailor their financial disclosure programs in order to hold employees accountable for compliance with ethics rules while devoting the agencies' resources where they will be most effective. OGE has authority to grant an agency's request to extend the coverage of public financial disclosure requirements to any position upon a finding that the position is of "equal classification" to positions whose incumbents are required to file public financial disclosure reports. OGE also has authority to grant an agency's request to exclude a position from the coverage of public financial disclosure requirements upon a finding that the position is of a confidential nature and has no policy-making role. In addition, OGE considers requests for agencies to establish alternative confidential financial disclosure procedures that will enhance the agencies' abilities to identify and remedy potential conflicts of interest effectively.

Supported the enforcement communities through advice, training, and collaboration

OGE provides advice and training to the various enforcement communities, including DOJ's criminal and civil divisions, Inspectors General, and employee relations professionals. OGE routinely assists Inspectors General and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations, as well as how an effective ethics program supports enforcement.

In fiscal year 2015, OGE's Director, who is a standing member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), increased his involvement in CIGIE's activities. OGE also provided direct support to five investigators from Inspectors General offices and federal prosecutors who requested assistance with the interpretation and application of federal conflict of interest laws and ethics regulations in connection with live enforcement matters. OGE instructors provided well-received training to 90 attendees at the Inspector General Criminal Investigation Academy, focusing on investigating ethics-related matters and working with ethics officials. This particular training is an integral part of the Academy's curriculum and complements a web-based training module OGE developed for Inspector General investigators. In addition, OGE's Director spoke to approximately 90 ethics advisors from U.S. Attorney's offices throughout the nation at the Department of Justice's National Advocacy Center in Columbia, South Carolina.

OGE also coordinated with the government's employee relations officials. In agencies throughout the executive branch, employee relations officials play important roles in enforcing

administrative rules through the federal disciplinary process. In fiscal year 2015, OGE invited the employee relations community to participate in a distance-learning event focused on the federal administrative investigation and discipline processes, the ethics official's role in these processes, and recent MSPB cases involving violations of the Standards of Ethical Conduct. OGE designed this training to support effective investigations of potential ethical wrongdoing by agency employees and to help hold employees accountable for adhering to the ethics rules.

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will continue to conduct reviews of agency ethics programs, gather data about each agency and the overall executive branch ethics program, monitor agency leaders' compliance with their ethics agreements, review senior officials' financial disclosure reports, and support the ethics enforcement communities. Key highlights of OGE's planned work are described below.

Conduct program reviews

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable requirements throughout the executive branch, OGE plans to conduct a program review of every agency in the executive branch at least once between January 2014 and January 2018. OGE plans to conduct appropriate follow-up reviews to assess agencies' progress in implementing the recommendations that OGE makes in its program review reports.

In fiscal years 2016 and 2017, OGE will work toward achieving this goal through its program reviews, consisting of a combination of plenary reviews and inspections. Generally, OGE will conduct plenary reviews at Cabinet-level departments and at the largest executive branch agencies, while inspections will largely be limited to the smaller agencies. However, as noted on page 15, the inspection process also serves as a risk management tool by allowing OGE to assess whether an agency requires a full plenary review. If an inspection identifies systemic risks in an agency's ethics program, OGE will conduct an additional plenary review to dig deeper into the programmatic causes of those risks. This process ensures that program weaknesses and deficiencies are identified and corrected so that the associated risks to the agency are mitigated. As part of these efforts to conduct meaningful reviews of every agency, OGE will require the requested travel funding to conduct onsite reviews at agencies headquartered outside of the Washington, D.C. metropolitan area and, as necessary, reviews of large components and regional offices located outside of that area.

One mechanism by which program reviews currently enhance the executive branch ethics program is through the identification and sharing of model practices that agencies have implemented to effectively manage their programs. In fiscal years 2016 and 2017, OGE will continue to use the program review process to identify model practices and will share these practices with the executive branch ethics community during program reviews and at the 2016 National Government Ethics Summit (for more information on the Summit see page 25-26). By sharing innovative methods already in place at certain agencies, OGE can leverage the access afforded by the program review process to improve the executive branch program as a whole.

Collect, analyze, and publish program data from executive branch agencies

In fiscal years 2016 and 2017, OGE will continue collecting, analyzing, and publishing information about the executive branch ethics program. OGE will use the information collected through responses to the Annual Questionnaire to evaluate the executive branch ethics program. OGE will continue to share key highlights and the full data set from the Annual Questionnaire with the ethics community and the public on its official website. In addition, OGE will continue to implement Executive Order 13490. OGE will conduct an executive branch-wide survey to gather data on compliance with the Executive Order and will publish the results on OGE's website in an annual report to the President on agency compliance.

Monitor compliance with commitments made by incoming agency leaders to resolve conflicts of interest

OGE will continue working 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. In fiscal years 2016 and 2017, OGE will continue to monitor the timely compliance by PAS officials with the commitments in their ethics agreements. New features of FDTS, discussed on page 19, will make it easier to monitor the increased volume of ethics agreements resulting from the turnover of senior leaders due to the Presidential transition in 2017.

OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that these reports are timely filed, accurately completed, and thoroughly reviewed by agency ethics officials for potential conflicts of interest.

Support the vital work of the enforcement communities

To support the work of the enforcement communities responsible for holding agency employees accountable for abiding by the conflict of interest laws, OGE will continue providing them with guidance on the interpretation and application of the conflict of interest laws and ethics regulations in fiscal years 2016 and 2017. OGE will invite members from these communities to participate in the 2016 National Government Ethics Summit, and OGE staff will continue to provide training as part of the Inspector General Academy's Public Corruption Investigations Training Program. In addition, OGE's Director will continue to participate in activities of the Council of Inspectors General on Integrity and Efficiency.

Strategic Objective 1.3: Contribute to the professional development of ethics officials

OGE continues to prioritize work on its strategic objective of contributing to the professional development of ethics officials, made all the more important by the number of ethics officials eligible for retirement. OGE is committed to educating executive branch ethics officials and federal employees on the conflicts of interest laws and ethics regulations. OGE's team of professional staff and attorneys has worked diligently to promote continuous learning, thereby increasing the overall skill of the executive branch's corps of professional agency ethics officials. In turn, OGE leverages these agency ethics officials to train the broader federal workforce regarding their ethical responsibilities.

Performance Highlights

OGE's success in leading the decentralized executive branch ethics program relies greatly on a highly trained community of ethics officials. In fiscal year 2015, OGE provided an array of educational opportunities to ensure that ethics officials had access to the expertise and tools they needed to do their jobs. Leveraging technology and existing resources, OGE was able to provide these opportunities to agencies free of charge.

Since refocusing its efforts and leveraging technology to provide more widely available training opportunities for ethics officials, OGE has increased registrations for its educational opportunities from about 1,200 registrations in fiscal year 2012 to more than 7,500 in fiscal year 2015, an increase of more than 500 percent. See Figure 9. Not only is the quantity of OGE training noteworthy, so is the quality. As discussed below, the overwhelming majority of registrants for OGE's educational offerings rated the quality of the offerings very highly.
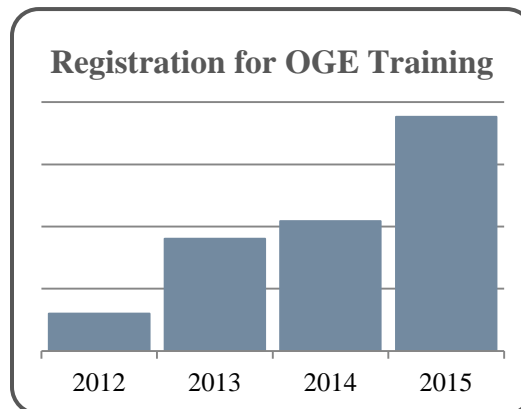

Figure 9: Registration for OGE Training

Conducted regular online distance learning events and in-person training
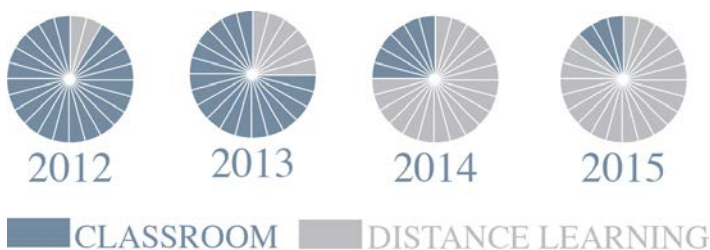

Figure 10: Change in Approach to Providing Training to Agency Ethics Officials

In fiscal year 2015, OGE continued to leverage technology to deliver training to the ethics community. For example, OGE uses a Google+ page to broadcast distance-learning events free of charge to anyone with an internet connection. In addition, training delivered through Google+ permits public access to the professional development training that OGE offers to ethics officials throughout government and around the world.

In fiscal year 2015, OGE continued to deliver its Ethics Fundamentals and Advanced Practitioner distance learning series. These series are designed to address, respectively, the needs of new and more experienced ethics officials in the executive branch ethics community. These monthly events allow OGE to reach ethics officials throughout the government with timely policy guidance, basic training, advanced training, model practices, and ethics news and information. A typical event reaches more than 250 officials during the live broadcast and is available on-demand for viewing after the event. In 2015, OGE offered nine Advanced Practitioner events and ten Fundamentals events. In total, 7,092 ethics officials registered for these events, and 93 percent of respondents to a course evaluation reported that participating in these events made them better able to do their jobs. Topics covered included gifts between

employees, financial disclosure, particular matters, and the criminal conflict of interest statutes. At the request of the ethics community, OGE also used the distance learning events to reprise sessions that were originally presented at the 2014 National Government Ethics Summit but were not recorded at the time.

In addition to the distance learning series, OGE developed and delivered two Massive Open Online Courses (MOOCs) on confidential financial disclosure and post-employment. MOOCs enable large numbers of ethics officials to experience content OGE typically delivers through half-day live training workshops. These multi-session presentations bring the feel of in-person classroom training to the online classroom by incorporating lectures, practical exercises, and self-assessments. Over 470 officials participated in the two MOOCs presented in fiscal year 2015, with 100 percent of respondents to a course evaluation reporting that attendance made them better able to do their jobs.

OGE also conducted four full-day sessions for advanced practitioners in person in Washington, D.C. These sessions were hosted by the Department of Justice, the Pension Benefit Guaranty Corporation, the National Aeronautics and Space Administration, and the Office of the Director of National Intelligence. These sessions provided opportunities for ethics officials from throughout the executive branch to increase their knowledge of ethics topics such as post-employment, outside activities, gifts, program administration, enterprise risk management, and financial disclosure. More than 100 officials participated in these events, and 91 percent of participants who submitted course evaluations indicated that the information presented was valuable to the performance of their job responsibilities.

Held symposia for ethics practitioners

OGE periodically offers symposia, which are events that allow large groups of ethics officials to receive training and collaborate with other ethics professionals. Symposia bolster the networks between OGE and executive branch ethics officials that support the ethics program, as well as increase the knowledge and skills of ethics professionals across the executive branch.

In fiscal year 2015, OGE held two regional symposia. These sessions reached nearly 80 regional ethics officials, who rarely have an opportunity to attend live OGE-sponsored training or to interact directly with OGE personnel. The symposia covered a variety of ethics topics including conflicts of interest, appearance concerns, financial disclosure, gifts, enforcement, and prevention. Of the participants who submitted course evaluations, 100 percent indicated that the information presented was valuable to the performance of their job responsibilities.

Performance Goal: In fiscal year 2015, OGE significantly increased its educational offerings, and those offerings continued to be well received by attendees. As a result of participating in courses offered by OGE, 96 percent reported that they better understood the subject matter presented and 93 percent reported that they believed they could more effectively perform their job functions.

Developed and made available useful training products

OGE developed training products to contribute to the professional development of ethics officials, as well as model training materials for agency ethics officials to use for both initial ethics orientation and annual ethics training of their own employees. Specifically, OGE began developing written materials that agencies can distribute to new employees, along with model training modules agencies can use and tailor to their own needs. OGE also began developing, with the assistance of agency ethics officials, a repository of targeted scenarios for use in conducting annual ethics training for employees whose responsibilities place them at increased or unique risk of facing certain ethical dilemmas. OGE also provided ethics officials with a high-quality template for their agency's annual ethics training plans. The template prompts ethics officials to think strategically about how they will deliver ethics training throughout the year.

Through the OGE Institute for Ethics in Government (IEG) "store" located on MAX.gov, OGE makes these and other materials, such as practical job aids and reference guides, available to ethics officials at no cost to assist them in the day-to-day operations of their programs. The IEG store is also where members of the ethics community can share similar products that they themselves have created, including materials to assist with annual employee ethics training. The IEG store is an efficient way for agency ethics officials to obtain the educational materials that are most

% of ethics officials that use training products made available by OGE

	2014	2015
☐ Target	75%	75%
■ Actual	88%	81%

Figure 11: Ethics Training Products

pertinent to their particular needs. In addition to the products available in the IEG Store, OGE makes available all of the video and audio recordings of the distance learning events OGE sponsors, as well as the informational slide decks, job aids, and reference materials created to support those events, on-demand through MAX.gov. Ethics programs are routinely encouraged to use these on-demand courses and materials to train their own staffs.

Performance Goal: 81 percent of ethics officials used a training product made avaliable by OGE.

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will continue to focus on providing high-quality, cost-effective training opportunities to ensure that ethics officials have the expertise and tools they need to do their jobs. Key highlights of OGE's planned work are described below.

Hold the 2016 National Government Ethics Summit and Symposium on Financial Disclosure

In fiscal year 2016, OGE will hold its second National Government Ethics Summit (Summit), a low-cost, multi-day training event, in Washington, D.C. OGE designed the Summit to strengthen the executive branch ethics program by providing attendees with opportunities to

deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections with ethics officials who can assist in resolving even the most complex ethics issues. The Summit will consist of three full days of live instruction for approximately 400 participants. Significantly, it will be provided at a low cost to participants, because OGE will hold the Summit entirely at federal facilities in the Washington, D.C. metropolitan area. The Summit will bring together hundreds of executive branch ethics officials and external stakeholders, including officials from the other branches of the federal government, Inspectors General staff, members of the press, and advocates from good government groups.

The primary focus of the Summit will be to prepare ethics officials to respond effectively to the ethics issues likely to arise during an election year and during the first year of the Presidential transition. These issues include seeking employment, post-employment restrictions, nominee financial disclosure, and on-boarding new senior leaders, as well as issues unique to a Presidential transition, such as the Vacancies Reform Act.

As a means of both expanding the reach of the Summit and increasing the transparency of the executive branch ethics program, OGE will leverage technology to livestream many of the sessions. This will provide ethics official across the country, in addition to interested members of the public, significant access to the Summit. OGE will also post recordings of these events on its YouTube and Google+ pages, so that they will remain available for future viewing and educational use.

In addition to the Summit, OGE will host the Symposium on Financial Disclosure. The Symposium is a free, full-day, in-person training event for beginner and advanced financial disclosure reviewers. This training will enable agency ethics officials to successfully manage the surge in financial disclosure filings related to a high volume of departing employees and incoming PAS nominees. The beginner financial disclosure track will prepare ethics officials to review the new OGE Form 278e. The advanced financial disclosure track will prepare ethics officials to review the complex issues presented by PAS nominee financial disclosure reports.

These events will be important to the success of OGE's vital role in the Presidential nominations process as described in more detail on page 37 under Strategic Objective 2.1.

Conduct online distance-learning events and targeted in-person training

In fiscal years 2016 and 2017, OGE will continue to deliver training events that provide ethics officials throughout government with needed training, exposure to model practices, timely policy guidance, and ethics news and information. OGE will continue to deliver the Ethics Fundamentals and the Advanced Practitioner distance learning series. OGE will also offer distance-learning workshops and will continue to deliver training through its Massive Open Online Courses (MOOC program). OGE will broadcast these events free of charge through its Google+ and YouTube accounts, allowing OGE to reach larger audiences. OGE will continue to leverage the experience and knowledge of the ethics community by inviting ethics officials to regularly present as part of these distance-learning events.

Develop and disseminate training products

OGE will continue to develop ethics educational products and to disseminate products developed both by OGE and by agency ethics programs. In particular, OGE's staff will continue to create original products, including materials that agencies can customize to satisfy regulatory requirements for their new employee ethics orientations and annual ethics training, such as written documents and training scenarios that ethics officials can deliver in a variety of formats.

Strategic Objective 1.4: Modernize and implement the ethics regulations

Ethics regulations serve as the building blocks of the executive branch ethics program. OGE reviews and revises the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21st century government.

Performance Highlights

Submitted new and revised ethics regulations for review and publication

In fiscal year 2015, OGE made significant progress toward finalizing key regulatory changes to the Standards of Ethical Conduct for Employees of the Executive Branch found at 5 C.F.R. part 2635 (Standards of Conduct). The Standards of Conduct serve as the foundation of federal government employment and set the expectations of conduct for every executive branch employee. OGE targeted for revision two areas of significant interest to ethics officials and employees: gifts and seeking employment (subparts B and F of part 2635). OGE focused on the gift rules because they generate more questions than any other area of the Standards of Conduct, and on the rules governing seeking employment because they were affected by new reporting and recusal requirements that were enacted as part of the STOCK Act.

As part of its process, OGE solicited significant input from over 100 ethics officials representing dozens of agencies through a variety of mechanisms, including a survey, sessions at OGE's 2014 Summit, and two focus groups. This outreach helped OGE to leverage the expertise and experience of officials charged with providing employees advice on these rules every day. OGE used their feedback to inform its approach to revising the Standards of Conduct, and incorporated numerous suggestions that they and others provided.

After consulting with the Department of Justice (DOJ) and the Office of Personal Management (OPM), as required by OGE's organic statute, OGE submitted its proposed changes to the Standards of Conduct to the Office of Management and Budget (OMB). The changes to the Standards of Conduct would tailor the gift rules to focus on issues that could affect the public's confidence in government decision-making and will ensure that executive branch employees have clear guidance on how to comply with STOCK Act requirements regarding negotiations for future employment.

Performance Goal: OGE met its target to submit revisions to subparts B and F of the Standards of Ethical Conduct for Executive Branch Employees to DOJ and OPM.

The STOCK Act also imposed additional financial disclosure requirements on individuals required to file public financial disclosure reports. In order to address these additional requirements, OGE conducted an in-depth review of its financial disclosure regulations and developed a draft proposed revision. This process also included significant input from agency ethics officials who are charged with the day-to-day administration of individual agency financial disclosure programs and provided invaluable insight. OGE is proposing changes to these regulations to incorporate the new reporting requirements imposed by the STOCK Act. OGE is also modernizing language, adding and updating examples, and revising the language of the regulation to conform more closely to that of the Ethics in Government Act. The proposed changes to the financial disclosure regulations will help clarify how the financial disclosure laws apply to filers and agency financial disclosure programs. In fiscal year 2015, OGE submitted these proposed regulatory changes to its financial disclosure regulation to DOJ and OPM for clearance, as required by OGE's organic statute.

Began an in-depth review of the ethics regulation on executive agency ethics program responsibilities

In fiscal year 2015, OGE began an in-depth review of the Office of Government Ethics and executive agency ethics program responsibilities found at 5 C.F.R. part 2638. This regulation provides the basis for how to administer the executive branch ethics program. This regulation was issued in 1981 and, with the exception of piecemeal edits, has existed in nearly its original form for almost 35 years. As such, the regulation required significant updating to more accurately reflect the current status of the executive branch ethics program and to clarify certain provisions that have historically caused confusion among external stakeholders regarding OGE's role in the program. As a result, OGE elected to draft a complete revision of part 2638.

As part of its review, OGE solicited input from ethics officials representing approximately 45 agencies through focus groups and one-on-one meetings and officials from approximately 20 Inspectors General offices. In total, OGE held 10 meetings and three conference calls with the various agencies consulted, including individual meetings with the Department of State, the Department of Defense, DOJ, and OPM. This outreach helped OGE to leverage the expertise and experience of those charged with managing and implementing the ethics program. OGE used this feedback to inform its approach to revising the regulation, and incorporated numerous suggestions provided by agency ethics officials. OGE then submitted the revised draft to OPM and DOJ for further consultation, as required by OGE's organic statute.

Reviewed and updated agency-specific ethics regulations and separate component designations

OGE consults with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs. In fiscal year 2015, OGE and two federal agencies jointly issued two new supplemental agency ethics regulations addressing prohibited financial holdings that are likely to pose a conflict of interest for employees of certain agency components. These agency-specific supplemental ethics regulations heighten the ethics restrictions on employees of the agencies they cover.

OGE also updated the component designations found at Appendix B to part 2641, based on agency recommendations, for the purpose of applying the post-government employment ethics restrictions. These separate component designations ensure that the post-employment rules are limited to ensuring that former federal employees do not make unfair use of their prior federal employment to influence government, without unfairly restricting employees of large agencies and departments with regard to separate components over which they lacked influence while serving in the government.

Updated ethics records schedules

OGE continued to work with the National Archives and Records Administration (NARA) on updating its General Records Schedule (GRS) provisions related to ethics records. Specifically, OGE consulted with and assisted NARA in revising the GRS to update and consolidate provisions related to the disposition of ethics records.

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will continue to work on modernizing the ethics regulations to ensure their continued effectiveness and applicability in the modern day. OGE will also continue to issue supplemental agency ethics regulations in consultation with individual executive branch agencies. Key highlights of OGE's planned work are described below.

Publish revised ethics regulations for comment

In fiscal year 2016, OGE plans to publish the proposed changes to the gift and seeking employment provisions of the Standards of Conduct in subparts B and F of part 2635 in the Federal Register for public comment, after receiving the necessary clearances. OGE's update to the Standards of Conduct will ensure continued effectiveness and applicability to situations faced by employees in a 21st century government. OGE also plans to publish the proposed changes to its financial disclosure regulations in fiscal year 2016, after receiving the necessary clearances. The updated financial disclosure regulations will help clarify how the financial disclosure laws apply to filers and agency financial disclosure programs. In addition, OGE plans to finalize its revisions to the ethics program administration regulations found at 5 C.F.R. part 2638 and to publish the proposed changes for comment after receiving the necessary clearances. OGE also plans to complete a draft revision to the remaining subparts of part 2635 and to initiate the consultation process required by OGE's organic statute by submitting the draft to OPM and DOJ, with the goal of publishing a regulation in fiscal year 2018.

If the proposed revisions to the Standards of Conduct, the financial disclosure regulations, and the ethics program administration regulations become final, in fiscal years 2016 and 2017, OGE will update its training materials and the content on its website to reflect and explain these updates. OGE will also provide external training to agency ethics officials and will issue legal and program advisories on the application of the revisions. OGE will also internally train its Desk Officers on the new rule changes to ensure that OGE provides timely and accurate advice in response to questions from agency ethics officials. Given the extent of the regulatory

revisions, this activity could require significant commitment of OGE's resources, depending on the number of proposed regulatory revisions that become final during this period.

Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch

OGE plays an important role in the continuity of senior leadership in the executive branch by assisting in the President's constitutional duty to nominate and appoint officers to the executive branch, educating those leaders on their ethical responsibilities, and supporting succession planning within the ethics community. Specifically, OGE works with agency ethics officials to identify and resolve any conflicts of interest leaders coming into government 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 requested resources for staffing and *Integrity* funding is vital in 2016 and 2017 to ensure that OGE is ready for and performs effectively during the 2017 post-election period. Because agency leaders play a significant role in promoting an ethical culture and supporting an agency's ethics program, OGE leverages the nomination process to impart to new agency leaders the importance of the ethics program and their role in supporting it. In addition, OGE contributes to the continuity of senior leadership by supporting succession-planning efforts in executive branch agency ethics programs. Proper succession planning is key to mitigating the loss of ethics expertise that stems from the significant turnover within the executive branch due to the retirement of experienced executive branch ethics officials.

Strategic Objective 2.1: Provide assistance to the President and the Senate in the nomination of top-level executive branch officials

OGE reviews the financial interests of nominees to Presidentially-appointed, Senate-confirmed (PAS) positions for possible conflicts of interest with their prospective duties. OGE works with ethics officials to resolve any identified potential conflicts of interest on the part of nominees by establishing written ethics agreements with them prior to confirmation. For most PAS nominees, OGE's financial disclosure program represents their first encounter with the ethics requirements of the executive branch. Therefore, the ethics review of PAS nominees' financial interests provides OGE with the opportunity to impress upon these most senior executive branch officials the importance of their roles as top leaders in creating and fostering an ethical culture at their agencies.

OGE's role in assisting the President in nominating top-level executive branch officials is particularly important during the transition period following a Presidential election. The nation is vulnerable to a variety of risks, including risks associated with national security and natural disasters, during a Presidential transition when leadership is transferred and nearly all political positions are vacant. For this reason, the processing of Presidential nominations must be accomplished as efficiently as possible. OGE plays an integral role in this process by ensuring that PAS nominees are free of financial conflicts of interest. The workload associated with this role is expected to triple with the election of a new President in 2016.

OGE, in consultation with the Office of Management and Budget, has determined that performance toward this objective is making noteworthy progress.

Performance Highlights

Reviewed financial disclosure reports of the highest government leaders

In fiscal year 2015, OGE reviewed the reports of nominees for approximately 22 percent of the PAS positions. By leveraging existing resources and improving internal processes and tracking, OGE was able to meet the priorities set by the White House and the Senate.
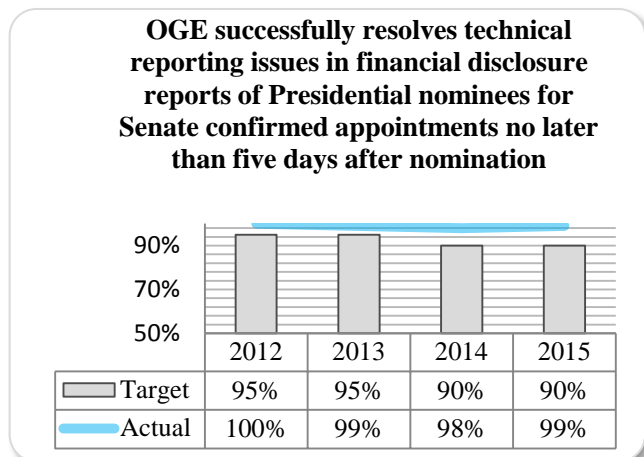
OGE successfully resolves technical reporting issues in financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination

	2012	2013	2014	2015
Target	95%	95%	90%	90%
Actual	100%	99%	98%	99%

Figure 12: PAS Nominee Financial Disclosure Reports

Identifiable substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination

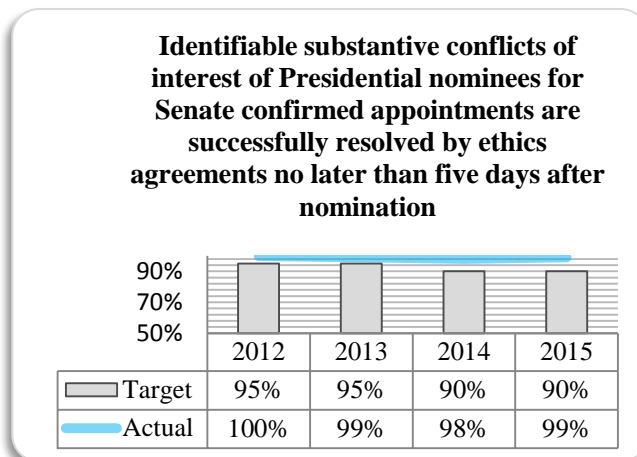|	2012	2013	2014	2015
Target	95%	95%	90%	90%
Actual	100%	99%	98%	99%

**Figure 13: Ethics Agreements of PAS Nominees**

Performance Goal: OGE measures its performance by the successful and timely resolution of conflicts and technical reporting issues for nominee financial disclosure reports. OGE's standard is to resolve conflicts and technical reporting issues no later than five days after a nomination is made. OGE exceeded its targets in this area.

Successfully launched Integrity, a statutorily mandated electronic public financial disclosure filing system for the executive branch

On January 1, 2015, OGE successfully launched *Integrity*, a secure, web-based electronic filing system for executive branch public financial disclosure report (OGE Forms 278e and 278T) filers mandated by the STOCK Act. *Integrity* significantly enhances the filing, review, and program management aspects of the executive branch public financial disclosure program. A combination of data-entry tables and context-dependent questions helps filers identify all of their reportable financial interests and to disclose those interests correctly. *Integrity* also enables agency ethics officials to assign, review, track, and manage reports electronically. OGE also focused on ensuring the security of user access and maintaining data.[2]

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[2] *Integrity* utilizes the MAX.gov Shared Services platform (MAX) for authentication. MAX is fully certified and authorized to operate under the Federal Information Security Modernization Act (FISMA) stringent security requirements at the FIPS-199 Moderate level as defined by NIST. MAX has been independently assessed for cyber security protections by a FedRAMP-accredited third-party assessment organization (3PAO) and granted FedRAMP

While *Integrity* was launched on January 1, 2015, the first true test of the system occurred during the 278 annual filing season in the spring of 2015. During that time, public filers from approximately 34 agencies submitted their annual 278 reports using *Integrity*, which were in turn reviewed and certified by agency ethics officials also using the system. A user survey conducted for agency ethics officials after the annual filing season indicated that 90 percent of respondents would recommend *Integrity* to other executive branch agencies. Survey results also indicated that system users were highly satisfied with *Integrity* and with the support provided by OGE, both before and during this first critical filing season. See Figure 14.
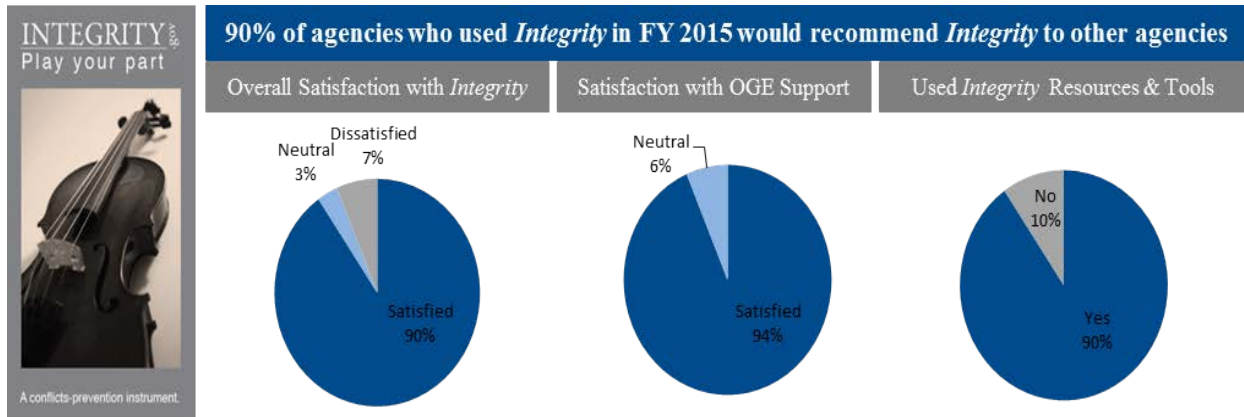
Figure 14: *Integrity* **User Feedback**

Using a shared-services model with operational funding in OGE's budget, OGE is continuing to make *Integrity* available to executive branch agencies without charge, thereby reducing duplication, overlap, and fragmentation within the executive branch. A Rollout Team comprised of OGE staff continues to work to set up agencies in *Integrity*, register their filers, and provide training resources for filers as well as agency reviewers and administrators. Currently, over 115 agencies are using *Integrity*, and nearly 11,000 senior executives and Presidential appointees are registered as filers in the system.

OGE requires executive branch agencies use *Integrity* for their PAS and DAEO filers, beginning January 1, 2016. OGE has been actively working with executive branch agencies not already using *Integrity* to transition their Presidentially appointed, Senate-confirmed filers into the system. Notably, several agencies decided to abandon previously used legacy electronic filing systems, some of which are fee-for-use systems provided by external sources and some of which are internal, agency-created proprietary systems, in favor of adopting *Integrity* for all or substantially all of their public filers. In December 2015, OGE deployed functionality to enable nominee filers to use *Integrity,* and began processing nominee filings. This was a critical accomplishment because it required the development of complex workflows in the system and

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Authorization as a government-wide shared service. MAX Authentication fully supports 2-factor, HSPD-12 strong authentication through agency PIV/CAC cards. MAX has indicated that it will soon be rolling out SMS 2-factor for use in situations where PIV card access is not available (such as nominees who are not yet government employees).

because the timing will allow executive branch agencies and the White House to gain critical experience using the system in advance of the Presidential transition.

The successful launch and initial deployment of *Integrity,* as well as the continued development, security, and monitoring operations of such a large and complex system remain immense undertakings for OGE. For example, developing and testing *Integrity* required an agency-wide commitment and participation from nearly every member of OGE's staff, as well as the participation of ethics officials from agencies throughout the executive branch. In addition, over the past two years since it began developing *Integrity,* OGE has significantly increased its access to technological expertise, leveraging both external and internal sources. These include establishing inter-agency agreements with the Budget Formulation and Execution Line of Business (established in 2007 by the Office of Management and Budget) and the National Information Technology Center of the Department of Agriculture, the hiring of two senior Information Technology officials to serve as in-house experts at OGE, and establishing relationships with outside contractors with significant expertise and experience in the field.

OGE anticipates that as the number of agency users and filers in *Integrity* grows, and as more functionality is deployed, more benefits and executive branch-wide efficiencies will be realized. Significantly, based on feedback from current agency users, *Integrity* has already resulted in more accurate and complete public financial disclosures. Features such as smart tables that guide filers to include all necessary information and a wizard that automatically generates questions tailored to common positions held outside government have helped filers capture assets and holdings that may have traditionally been underreported. In addition, features such as automatic reminders, the ability to compare past reports with new reports in the system for additions or changes, and the ability to create endnotes and public annotations have greatly enhanced the filing, review, and program management aspects of the executive branch public financial disclosure program.

Performance Goal: OGE met its goal of having multiple agencies process their financial disclosure reports in *Integrity.* At the end of the fiscal year, 34 agencies were processing financial disclosure reports in *Integrity*, with a total of 7,128 individual filers registered in the system. Between January 1 and September 30, 2015, those filers submitted more than 5,000 reports (OGE 278e and OGE 278-T).

Redesigned the executive branch public financial disclosure form

As part of the transition to the use of *Integrity*, OGE redesigned the executive branch public financial disclosure form, the OGE Form 278. The new OGE Form 278e, which is available in both paper format (through an Excel spreadsheet) and a rendered format through *Integrity*, collects the information required by the Ethics in Government Act but displays it in a more easily understandable format. Specifically, OGE reorganized the disclosure of information based on its experience that filers, particularly filers entering government service for the first time, have difficulty accurately reporting the financial interests related to their employment and their spouses' employment. By segregating financial interests related to the outside employment of filers and their spouses, the OGE Form 278e reduces the risk of errors and inadvertent

omissions. This structure also promotes transparency by highlighting information of significant interest to the public.

As part of the deployment of *Integrity* and the new OGE Form 278e, OGE issued two program advisories that explained the changes to the public financial disclosure form, discussed the purpose for those changes, and provided a table that cross-referenced where certain items are reported on the new form compared to the prior form. OGE also delivered in-person briefings on the new form to staff members from 14 Senate Committees that review Presidential nominations for Senate confirmation about the new form and provided the comparison tool. OGE proactively reached out to Senate staff before they received the first new form both to explain the changes to the form and to clarify OGE's mission and its role in reviewing financial disclosure documents in the Presidential nomination process.

Developed key resources for financial disclosure filers

In fiscal year 2015, OGE created two new resources for financial disclosure filers: a series of targeted financial disclosure reporting checklists and a pamphlet explaining the Certificate of Divestiture program that OGE administers. OGE modified a series of plain-English financial disclosure checklists that address common errors and inadvertent omissions, both for all public filers generally and for filers entering the government from certain fields, such as law, academia, and corporate practice. The checklists provide reminders of financial disclosure items that prospective nominees should include in their reports, thereby helping to ensure thoroughness and consistency of information reported by nominees.

OGE also updated a pamphlet that provides answers to frequently asked questions about the Certificate of Divestiture program. The pamphlet is a resource for executive branch employees who are required to sell assets in order to avoid a conflict of interest or an appearance of a conflict of interest and are considering requesting a Certificate of Divestiture, as well as the ethics officials who counsel them.

Developed and implemented a comprehensive training plan for OGE staff

To build internal capacity to handle the surge in volume of nominee financial disclosure reports during the Presidential transition, OGE developed and implemented a comprehensive training plan for its staff. The plan is customized based on each employee's knowledge level and is designed to build the skills of intermediate and experienced reviewers, as well as to train other staff members who do not currently review nominee reports to review them during transition. In addition to classroom training, activities include hands-on practical exercises and assignments to reinforce learning. The plan also incorporates a mentorship program to complement the formal training and enhance and accelerate the learning.

Participated in meetings and provided feedback on transition-related issues

OGE participated in meetings and provided feedback on important transition-related issues to former administrative leaders, non-governmental organizations, legislative staff, and other executive branch agencies. For example, OGE is an active member of the Transition

Service Providers Council and has been working with the General Services Administration (GSA), the Office of Personnel Management (OPM), and the National Archives and Records Administration (NARA) to coordinate transition preparations. OGE also provided relative substantive content for the Presidential Transition Directory. Finally, OGE worked closely with the Partnership for Public Service, a non-partisan organization that actively promotes efforts to facilitate a smooth Presidential transition. OGE contributed significantly to these efforts, including obtaining input from individuals who were active in both the Bush and Obama Presidential transitions.

Planned Work for Fiscal Years 2016 and 2017

During fiscal year 2017, OGE will undertake one of its most important roles: assisting in the smooth transition to a new Presidential administration and in the appointment of senior officials during the first year of the new administration. Periods of Presidential transition are periods of peak activity for OGE. OGE anticipates that most of the 1,100 non-uniformed PAS positions in the executive branch will need to be filled during the Presidential transition. This massive transfer of power from one administration to the next requires intensive preparation through significant internal and agency training, new guidance, resources and materials, and early contact with the transition coordinators for the Presidential campaigns. Key highlights of OGE's planned work are described below.

Operate and improve Integrity, OGE's electronic executive branch-wide public financial disclosure filing system

In fiscal year 2015, OGE launched and began operating *Integrity,* the executive branch-wide electronic public financial disclosure system required by the STOCK Act. OGE will continue to focus on operating, refining, and enhancing *Integrity* in fiscal years 2016 and 2017.

In fiscal year 2016, OGE used requested funding to successfully complete *Integrity's* nominee functionality, and Presidential nominees have begun securely using the system in time to become familiar with it in advance of the Presidential transition. Based upon the overwhelmingly positive feedback OGE has received about the nominee functionality, OGE believes that its goals of creating a system that assists filers in more accurate reporting and reviewers in more efficient review and certification have been realized. OGE will continue to work with the Presidential Personnel Office and individual agencies to assist them in establishing filer accounts and configuring their administrative preferences within the system so that financial disclosure filers can enter and submit reports for review and certification by ethics officials during the 2016 filing cycle. Further, OGE will continue to consult with agency ethics officials about their and their filers' experiences with the system.

OGE will use requested funding in fiscal year 2016 to make planned improvements to *Integrity*, and to ensure that *Integrity* remains secure. The planned improvements are necessary

because they include key features that OGE could not fund prior to the initial launch of the system, such as system "flags" to highlight disclosure errors, advanced analytics, and expanded ethics data collection and tracking. Moreover, user feedback OGE receives will enable OGE to prioritize other system enhancements and to address the types of technical issues that tend to arise in such a complex systems. Finally, OGE will ensure that the system remains secure by obtaining appropriate security reviews and by updating its security practices regularly, such as by adding a two-factor authentication process in fiscal year 2016.

OGE will also enhance its direct support of agency ethics offices, which administer *Integrity* at the agency level. To this end, OGE will update and revise content in its online assistance library, including FAQs, video tutorials, and quick-start guides. OGE will expand its help desk staffing to respond to requests for assistance from agency ethics offices on behalf of their agency's users. OGE anticipates this expansion will be necessary to adequately support the growing number of executive branch agencies using *Integrity*.

By the end of the first quarter of fiscal year 2016, when *Integrity* will have been operational for only a year after its launch, OGE anticipates that almost all executive branch agencies, except for certain intelligence agencies, will have registered PAS filers in *Integrity*. At that time, OGE anticipates that the scope of the help desk's responsibilities will have grown from the 34 agencies, the number of agencies it currently supports, to over 125 agencies. Many agencies have chosen to abandon fee-for-use efiling systems for other public financial disclosure filers, in addition to nominees, in order to take advantage of the shared-services approach and functionality that *Integrity* provides at no cost. If this trend continues, the number of users could also grow beyond OGE's current expectations.

In fiscal year 2017, OGE will continue its focus on operating, refining, and enhancing *Integrity*. Inasmuch as the number of agencies using Integrity may increase from 34 to 125 in fiscal year 2016, OGE will have received feedback from a much broader population by fiscal year 2017. Therefore, OGE will again need to use requested funding to improve *Integrity* based on the additional user feedback. OGE also expects to use some of the requested funding to finalize improvements to nominee functionality after that functionality has been operational in a real-world setting for a year and OGE has received feedback from its users. These improvements will be critical for Presidential nominees to use *Integrity* during the period of the Presidential transition.

Prioritize and increase capacity to review complex financial disclosure reports of high-level government officials

In fiscal year 2016, OGE will continue implementing its comprehensive training plan to prepare staff for complex financial disclosure issues in preparation for the surge in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2017, following the 2016 Presidential election. OGE will devote significant resources toward building the knowledge and skills of OGE staff members who will be assigned to review financial disclosure reports during the Presidential transition by providing classroom training, individualized mentoring, and hands-on experiential training.

Assist agencies in preparing for the ethics and financial disclosure responsibilities associated with a Presidential transition

In addition to comprehensively training and developing its own staff, OGE will provide significant support to agency ethics officials to ensure that they are prepared for their significant responsibilities and the increased workload associated with the Presidential transition. Agency ethics officials must successfully manage the surge in financial disclosure filings related to a high volume of incoming nominees, as well as provide each new agency employee with an initial ethics orientation. Further, agency ethics officials must educate those officials leaving government service about the various ethics rules that apply to seeking employment and to post-government employment. In fiscal year 2016, OGE will provide resources and education opportunities to ethics officials on financial disclosure and these other important Presidential transition-related topics (see table on right for page references to other assistance OGE will provide to agencies).

OGE is also developing a comprehensive web-based guide to educate and assist PAS nominees in completing the new OGE Form 278e and periodic transaction reports. The guide will also provide ethics officials with instructions on reviewing financial disclosure reports and will include comprehensive guidance on the conflicts analysis for a large variety of financial interests and affiliations. The guidance will be in plain English in order to make it accessible and useful to the broadest possible audience. OGE will finalize and publish this guide in fiscal year 2016. The guide will benefit the approximately 26,000 public financial disclosure filers throughout the executive branch by providing clear guidance on how to report their financial interests. It will also expedite the financial disclosure review process by providing ethics officials with standardized guidance on reviewing a financial disclosure report and conducting a conflicts analysis.

> **Other Assistance Provided to Agencies in Preparing for the Presidential Transition**
>
> - Provide training at National Government Ethics Summit (see page 25) and through the Advanced Practitioner Series (see page 23)
>
> - Develop templates for Initial and Annual Ethics Training (see page 25)
>
> - Prepare ethics officials to onboard senior leaders (see page 40)

Figure 15: Assistance Provided to Agencies in Preparing for the Presidential Transition

Provide guidance and support to the Presidential transition team

In preparation for a Presidential transition and to assist in a smooth transition to a new administration, OGE will create guidance for the Presidential transition team and for nominees, respectively. These guidance issuances will explain the financial disclosure aspects of the nomination process; direct nominees to relevant resources, including *Integrity* and its related training materials for electronically filing their reports; provide an overview of the executive branch's ethics rules; and provide contact information for agency ethics officials. OGE created a similar product for the previous Presidential transition and received feedback that it was extremely useful to nominees, transition team members, and agency ethics officials.

Contribute to a successful Presidential transition

In fiscal year 2017, OGE will use a substantial portion of its staff to analyze and resolve the potential conflicts of interest of the highest-level, incoming executive branch leaders; to support agencies in introducing these incoming leaders to their new ethical responsibilities as public servants; and to support agencies in counseling departing officials with post-employment guidance. OGE will oversee agency efforts to remedy any potential conflicts on the part of Presidential nominees by negotiating effective ethics agreements with them and by ensuring compliance with financial disclosure reporting requirements. OGE will also track compliance with these ethics agreements after the nominees have been confirmed. In addition, OGE will continue providing agency reviewers with guidance and instruction that will improve their review of financial disclosure reports.

Strategic Objective 2.2: Promote leadership support of the executive branch ethics program

The success of each agency's ethics program is in large part dependent on the commitment of the agency's leadership to, and involvement in, the ethics program. Leadership support of an agency's ethics program helps agencies identify, assess, and mitigate risk to an agency's reputation and mission, enables agency leaders to focus on and accomplish agencies' missions, and helps ensure the integrity of government programs and operations. Because of the significant turnover in agency leadership associated with the Presidential transition, OGE has begun to shift its focus toward developing actionable strategies for cultivating leadership support of the ethics program and, in consultation with the Office of Management and Budget, has highlighted this objective as a focus area for improvement.
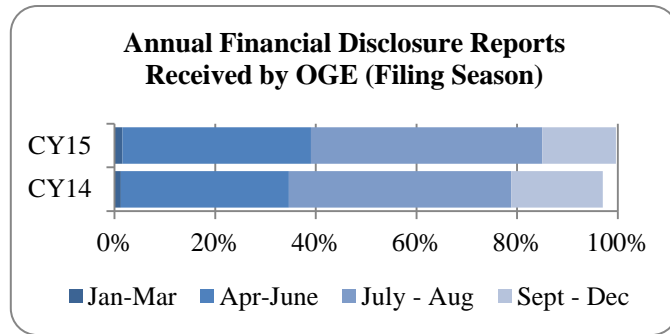
Performance Highlights

Engaged agency leaders about the importance of ethics

In fiscal year 2015, OGE renewed its commitment to meet with senior leaders in the executive branch to emphasize the importance and benefits of a strong executive branch ethics program and the unique role agency leadership plays in promoting an ethical culture. OGE used these opportunities to discuss the ways in which agency leaders can support the ethics program and to solicit feedback on how OGE can provide support and assistance to agencies.

Performance Goal: In response to the 2014 Annual Agency Ethics Program Questionnaire, 99 percent of agencies reported that their agency leaders demonstrate support for the ethics program. Also, ethics officials from ninety-one agencies indicated that they reported directly to the heads of their agencies regarding the status of their ethics programs in calendar year 2014. This is a strong indicator that ethics officials have access to top agency leaders.

In fiscal year 2015, OGE also implemented a new practice of sending year-end status reports to the head of each agency regarding the annual financial disclosure reports of the agency's PAS officials. The timely review and certification of these reports is critical because financial disclosure is the primary tool for identifying and resolving potential conflicts of interest on the part, executive branch officials. An agency's failure to collect and review PAS officials'

reports, resolve all conflicts of interest, and obtain OGE's certification in a timely manner places filers at risk of violating criminal conflicts of interest laws. More broadly, it could diminish the credibility of the ethics program and undermine the public's confidence in the integrity of the government's operations. As a result of issuing these year-end status reports to agency heads in calendar year 2014, OGE received a higher percentage of PAS financial disclosure reports earlier in

Annual Financial Disclosure Reports Received by OGE (Filing Season)

Figure 16: Volume of Reports Received by OGE (By Filing Season)

calendar year 2015 than in calendar year 2014. Accordingly, OGE's outreach to agency leadership successfully increased the timeliness of the conflicts of interest reviews conducted through the financial disclosure process across the executive branch.

Provided training on risk management and sensitized federal managers to ethics issues

In fiscal year 2015, OGE continued to deliver presentations on organizational risk management for senior government officials. OGE delivered in-person presentations that focused on, among other things, the importance of ethics, the role outside perceptions of government work plays in making management decisions, and the role of agency leadership in promoting the executive branch ethics program. In addition, OGE participated in a panel discussion titled "Ethics and Optics," which was part of a two-day orientation session for 250 new Senior Executive Service (SES) members. The panel was designed to help participants recognize and avoid common ethical violations, identify the people who can help them navigate potential pitfalls, and encourage them to serve as ethical leaders in their own organizations. OGE also hosted a number of virtual sessions addressing agency leadership, enterprise risk management, and cross-organizational collaboration. For example, OGE delivered a course on the fundamentals of enterprise risk management and hosted officials from the United States Agency for International Development and the Federal Bureau of Investigation regarding an agency-wide integrity work group, and compliance program, respectively.

Planned Work for Fiscal Years 2016 and 2017

As a result of the findings of OGE's strategic objective review process, in fiscal years 2016 and 2017, OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will use its education and training program to raise awareness of the benefits of a strong ethics program in reducing agency risk. In addition, OGE will further consult with ethics officials to determine how OGE can best support their efforts to engage agency leadership. Key highlights of OGE's planned work are described below.

Engage agency leadership in supporting a successful agency ethics program

In fiscal years 2016 and 2017, OGE will continue to seek opportunities to engage with senior leaders in the executive branch to emphasize the importance of a strong agency ethics program and how they, as leaders, can promote an ethical culture at their agencies.

During the Presidential transition, OGE anticipates the turnover of most of the approximately 1,100 PAS positions in the executive branch. These positions represent the most senior-level officials in the executive branch. Because senior leaders play a significant role in fostering an ethical culture, OGE will use the Presidential transition to impart to incoming leaders the importance of the ethics program and each leader's role in supporting the program. OGE will work with ethics officials to develop effective practices for onboarding these senior leaders in order to gain leadership support of the ethics program. For example, at the 2016 National Government Ethics Summit, OGE will host a session on developing effective ethics briefings for incoming new leaders. OGE will also directly communicate with senior leaders during the nomination process by providing guidance that explains the ethics rules and requirements that will apply to them during their tenure.

Another opportunity for OGE to impart to agency leaders the importance of a strong ethics program is through its oversight activities. During its program reviews of agency ethics programs, OGE will encourage agency leaders to take a visible role in the program and will recognize in its program review reports activities that agency leaders have taken to support the ethics program. Also in connection with OGE's program review processes, OGE will offer to meet with agency heads and other senior agency leaders to discuss the results of its agency program reviews. OGE will also continue its new practice of sending year-end status reports to the head of each agency regarding the annual financial disclosure reports of the agency's PAS appointees. In addition, OGE will continue to identify opportunities to communicate directly with senior leaders in government by speaking at events targeted at agency leadership.

Strategic Objective 2.3: Support succession planning in executive branch ethics programs

OGE supports succession planning in executive branch ethics programs to minimize the impact of knowledgeable employees leaving the workforce. Succession planning requires the documentation of current processes, transfer of institutional knowledge, and availability of personnel prepared to assume ethics official positions at all levels of the program. OGE provides training that supports succession planning in agency ethics programs.

Performance Highlights

Enhanced the professional development of agency ethics officials

In fiscal year 2015, OGE supported the development of new ethics officials by delivering four intensive days of fundamental ethics education through its Intensive Curriculum for New Ethics Officials program. This program targeted new ethics officials who had a critical need for intensive and rapid professional development because they had been or would soon be newly assigned to ethics responsibilities as Designated Agency Ethics Officials (DAEOs),

Alternate DAEOs, or ethics program managers. By focusing on those officials with the greatest responsibilities, OGE provided targeted, timely support to ensure continuity of operations in agency ethics programs.

Performance Goal: Per the Annual Questionnaire, 95 percent of agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs. The top two tools agencies reported using to address succession planning were: (1) structured training; and (2) the availability of a knowledge library (intranet, videos, and shared drives).

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will build on its efforts to support succession planning of agency ethics programs. Key highlights of OGE's planned work are described below.

Provide targeted training to support succession planning

OGE will dedicate a portion of its Advanced Practitioner Series and sessions at the 2016 National Government Ethics Summit to the topic of ethics program management to bolster agency ethics programs during the period of transition. OGE will also address routinizing risk assessment and mitigation practices, creating standard operating procedures to ensure program continuity, developing techniques for briefing new leaders, and instituting self-assessment programs to ensure preparedness for staff turnover.

Offer firsthand experience to agency ethics officials through an interagency detail at OGE

OGE will also continue to invite agency ethics officials to participate in interagency details at OGE to serve as financial disclosure reviewers. This detail program strengthens the executive branch ethics program because it allows agency ethics officials to gain valuable hands-on experience with support from OGE's knowledgeable staff and to bring that knowledge back to their home agencies' ethics program.

Strategic Goal 3: Promote transparency of the executive branch ethics program

Building public confidence in the impartiality of government decision making is at the core of OGE's mission. In support of the President's commitment to the principle of an open government, OGE directs resources toward raising the visibility of the systems in place to identify and resolve conflicts of interest and making ethics documents publicly available. Transparency increases accountability and public confidence by providing information to the public about the inner workings of government and the integrity of its decision-making processes.

Strategic Objective 3.1: Raise the visibility of the executive branch ethics program and the U.S. Office of Government Ethics

Raising the visibility of both the executive branch ethics program and OGE are critical steps toward building public confidence and awareness of the systems in place to protect the integrity of government operations and programs. To raise the visibility of the executive branch ethics program and the agency, OGE engages with audiences inside the federal government, as well as external audiences, including members of the general public, state and local governments, private sector organizations, professional associations, government oversight groups, the media, and foreign delegations. OGE actively shares information on its official website, on social media, through media contacts, and through presentations by OGE staff.

<u>Performance Highlights</u>

Built a culture of information sharing and strategic communication

In fiscal year 2015, OGE continued to build a culture of information sharing and strategic communications with its external stakeholders. In fiscal year 2015, a cross-divisional communications team worked to ensure consistency in OGE's external messaging, develop comprehensive communications plans for significant OGE initiatives, and create compelling and audience-friendly content for OGE's various communications platforms, including OGE's social media accounts and website. These efforts ensure that OGE disseminates information in a manner that is more easily understood by and accessible to its external stakeholders, and that targets those most interested in the content. These communications also ensure that OGE's stakeholders gain a greater understanding of OGE's work and can identify opportunities for coalition building and collaboration with OGE.

OGE refined its communications tracking systems and used the information collected to make data-driven decisions. OGE improved its use of its website, social media accounts and other communications tools, as well as better tailored the content of its communications to external audiences. OGE identified and remedied gaps in its communications outreach to its audiences. For example, OGE discovered that it had conducted limited outreach to executive branch enforcement communities other than the Inspector General community. As a result, OGE sought to engage the employee relations community who are key partners in the administrative enforcement of ethics violations. OGE presented a distance-learning event on the ethics official's role in the federal administrative investigation and discipline processes. OGE leveraged OPM's existing listserv for employee relations officials throughout the executive branch in order to invite them to attend the training virtually, via a livestreaming broadcast of the event. The session had well over 400 registered participants and 622 views on OGE's YouTube Channel.

Performance Goal: Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program. OGE measures the success of this performance goal through various performance indicators included in Figure 17 below.

Used OGE's website and social media as platforms to inform and educate

OGE's website is its primary tool for communicating with its external stakeholders and building confidence in the systems designed to detect and resolve conflicts of interest in the federal executive branch. In fiscal year 2015, OGE continued to review and update content on its website to ensure that the public can understand the work of OGE. For example, OGE updated its "About OGE" page to better explain OGE's mission and the importance of the executive branch ethics program in a public-friendly way.

OGE uses social media to broaden its reach to key external stakeholders. Specifically, OGE uses its Twitter account to drive traffic to substantive ethics content on its website and to provide accurate information about the executive branch ethics program to the public.

How are people connecting with OGE on social media?

Figure 17: Social Media

In fiscal year 2015, OGE refined the tone and content of its Tweets to be more engaging, public-friendly, and less technical. For example, the federal gift rules are a topic of interest during the holiday season. To provide accurate information in an easy–to-digest manner on the application of the federal gift rules during this time of heightened interest, OGE created a mini Twitter campaign, titled "Should Marty accept this gift?" (#ShouldMartyAcceptThisGift?). These tweets depict images of a hypothetical federal employee named Marty as he ponders whether he may accept a variety of gifts being offered to him throughout the holiday season, and they are linked to content on OGE's website explaining the gift rules for federal employees. This series of Tweets had significantly higher impressions, engagements, and engagement rate compared to the averages for the prior fiscal year.
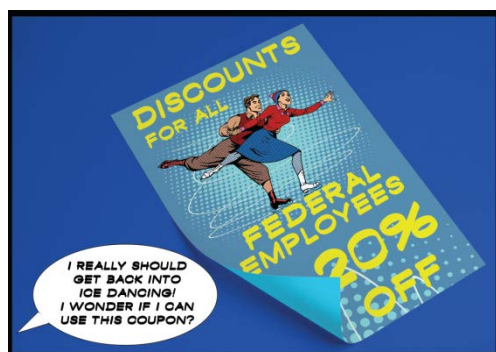
Figure 18: Tweet Example

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the increased number of new visitors to the agency's website and the continued growth in the number of its Twitter followers. In fiscal year 2015, the number of first-time visitors to OGE's website increased by 10 percent over the previous fiscal year. In total, 478,417 people visited OGE's website. In addition, OGE continued to see an increase in size and growth of its Twitter followers (an increase of 77 percent).

Collaborated with and engaged stakeholders

In fiscal year 2015, OGE continued to participate in professional, good government, and interagency groups to discuss emerging ethics issues and trends, share model practices, develop sound ethics policies, and combine resources to more effectively ensure that government decisions are made for the benefit of the public and not private gain. In fiscal year 2015, OGE continued to participate actively as a member of the Ethics and Compliance Initiative (EC&I),

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the Council on Governmental Ethics Laws (COGEL), and the Council of the Inspectors General on Integrity and Efficiency (CIGIE). As a member of EC&I and COGEL, OGE is able to share its legal analysis, programmatic experience, and model practices with the private sector and state and local government agencies. For more information on OGE's involvement with CIGIE, see page 20. In addition, OGE participated in interagency groups such as the Performance Improvement Council (PIC) and the General Counsel Exchange to share information about OGE and the executive branch ethics program. OGE's involvement with these organizations not only fosters valuable communication, it also leads to innovations in OGE's practices related to training, program and performance management, and general law.

OGE also organized in-person meetings with ethics practitioners and the leadership of good governance and government watchdog groups in fiscal year 2015. For example, OGE continued to meet with the Partnership for Public Service to discuss ways that OGE and the Partnership for Public Service could work together to help ensure a smooth Presidential transition. These meetings create opportunities to collaborate and share resources and information that enhance the executive branch ethics program. Further, through OGE-initiated "three branch meetings," OGE continued to collaborate with the most senior ethics practitioners from the legislative and judicial branches of the federal government on topics of common interest in the field of government ethics, such as seeking employment, post-government employment, and electronic financial disclosure. These meetings resulted in a greater understanding of approaches taken to address common issues and the differences in the role of each branch's ethics program.

Requests for Assistance (Non-Agency Audiences)	
Private Citizens	238
Press	157
Congress	26
For-Profit	29
Non-Profit	22
International	9
State/Local	7
Academia	8
Judicial	1

Figure 19: Requests for Assistance

To further build relationships with external stakeholders and promote understanding of the executive branch ethics program and OGE's mission, OGE accepted speaking invitations to address its external audiences, including professional associations, international anti-corruption groups, and the Inspector General community, on topics including conflicts of interest, ethical leadership, and enforcement. For example, OGE's Director participated in a roundtable and workshop on the regulation of standards in public life at the London School of Economics, and OGE's senior leadership presented on the importance of financial disclosure in preventing conflicts of interest at the World Bank Group's International Corruption Hunters Alliance.

Performance Indicator: In fiscal year 2015, OGE accepted 16 speaking invitations to address its external audiences.

Responded to requests for information and provided assistance

OGE responds to requests for information and assistance from its external stakeholders on topics such as public financial disclosure, gifts from outside sources, and post-employment.

For example, in fiscal year 2015, OGE responded to over 157 requests for assistance from the press. These interactions result in more accurate reporting about the ethics laws and regulations. These interactions also multiply OGE's ability to reach the general public to further promote understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also responded to requests for assistance from other stakeholders, including 215 requests from private citizens. This assistance promotes understanding of the executive branch ethics program and related ethics laws and regulations.

Performance Indicator: In fiscal year 2015, OGE responded to 726 requests from non-government, external stakeholders. See Figure 16. In addition, OGE and the executive branch ethics program were mentioned in 230 media articles during fiscal year 2015. Of the news media articles in which OGE and the executive branch ethics program were mentioned, 73 articles were connected to outreach conducted by OGE, OGE publications, or other content posted on OGE's website.

Shared information with foreign delegations and supported anti-corruption efforts

OGE's international work is conducted under the auspices of the State Department, which coordinates United States foreign policy. Through its international work, OGE helps build a global vision and a common commitment to fighting corruption and promoting good governance.

Figure 20: Information Sharing with Foreign Delegations

Fiscal year 2015 saw the completion of OGE's participation in a year-long review of the United States' implementation of the Inter-American Convention against Corruption. OGE was one of several United States anti-corruption oversight bodies analyzed by its international peers. As part of the review, OGE responded to an extensive questionnaire, hosted a site visit from international delegates, and participated in several pre-meetings. The process culminated in a March 20, 2015, plenary meeting of the mechanism's Committee of Experts to finalize the report on the United States.

OGE also continued to meet with foreign public- and private-sector groups through the State Department's International Visitor Leadership Program and similar programs. Through these programs, foreign delegations come to OGE to learn about the executive branch ethics program and how that program fits under the broader rubric of anti-corruption, good governance, and transparency. In fiscal year 2015, OGE briefed 36 foreign delegations comprising 322 individuals representing 84 countries, as highlighted in Figure 20. Of note, in May, OGE's Chief of Staff and Program Counsel met with world anti-corruption leaders in Hong Kong to discuss the role of public communications in government ethics and compliance programs.

OGE also continued to support U.S. government anti-corruption reporting requirements and good governance goals through a variety of multilateral forums such as the G20, the World Bank, and the Organisation for Economic Co-operation and Development (OECD), often at the

direct request of the State Department. For example, OGE provided a detailed description of the federal government's financial disclosure system, which the G20 will publish along with other countries' disclosure profiles. OGE also completed an OECD survey on managing conflicts of interest. Country responses to this survey served as a primary source for OECD's "Government at a Glance" publication, which is a comprehensive comparative analysis of public-sector performance across the globe. Finally, OGE continued to provide information about the executive branch ethics program in response to bilateral requests for assistance in benchmarking and improving anticorruption programs.

Planned Work for Fiscal Years 2016 and 2017

In fiscal years 2016 and 2017, OGE will continue to maintain its external communications efforts to raise the visibility of the executive branch ethics program generally and OGE's work in particular. Key highlights of OGE's planned work are described below.

Communicate more effectively

Public confidence in the impartiality of government decision making and the systems to detect and resolve conflicts of interest in the executive branch is critical. OGE has a responsibility to communicate about these systems effectively to its stakeholders. OGE has a wide spectrum of stakeholders – from experienced ethics practitioners and savvy government watchdogs to major federal partners and the general public. OGE has learned that different audiences gravitate towards different mediums, and that a tailored message crafted to fit a specific medium has the greatest impact. In fiscal year 2016, OGE will continue to refine its communications to ensure that content is accurate, compelling, relevant, and tailored to the audience and communication channel. To do so, OGE will continue to use analytics to assess the effectiveness of its communications and to identify and remedy gaps in its outreach.

OGE will also continue to refine its communications tools to more effectively reach its external stakeholders. Specifically, OGE will begin using website customer satisfaction surveys to help refine its website to more effectively provide information to its website users, provided that OGE receives approval for its generic information collection request discussed on page 49.

Develop and execute comprehensive communication plans

OGE's cross-division communications team will develop and execute comprehensive communication plans for significant OGE initiatives including the 2016 National Government Ethics Summit (see page 25), activities related to preparing for the next Presidential transition (see page 37), and proposed regulatory changes (see page 29). These high-profile initiatives provide OGE with opportunities to engage with its stakeholders about its important work, the executive branch ethics program, and the many laws and regulations that govern employee conduct. Therefore, it is critical that OGE consider which stakeholders will be interested in the content and how best to reach them.

Collaborate with and engage stakeholders through active memberships, in-person meetings, and speaking engagements

To share information and foster valuable collaboration, OGE will continue to participate as a member of private-sector and state and local ethics organizations such as EC&I and COGEL, in addition to federal interagency groups, such as CIGIE and the General Counsel Exchange. OGE will seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission. 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 through regular meetings.

Timely respond to external requests for information and assistance

OGE will continue to be responsive to requests for information and requests for assistance from its external stakeholders. Through such interactions, OGE aims to increase their awareness and understanding of the ethics laws and regulations so that accurate information is disseminated about the executive branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and producing news releases. OGE will also continue to respond to the numerous requests for information it receives from the general public.

Support the United States foreign policy initiatives

Finally, at the request of the U.S. foreign policy agencies, OGE will continue to participate in international programs designed to support and enhance U.S. foreign policy initiatives and assist in the areas of anti-corruption and good governance. OGE also will continue to meet with foreign delegations to provide information about U.S. implementation of ethics and good governance programs.

Strategic Objective 3.2: Ensure that ethics information is publicly available

Public availability of ethics information assures the American public that senior leaders are making decisions based on the interests of the public rather than their own personal financial interests. Ethics information includes public financial disclosure reports, program review reports on agency ethics programs, and written policy guidance. The availability of this information also assists executive branch employees in understanding the basic obligations of public service, holds OGE accountable for its activities, and supports ethics officials in carrying out the duties of their positions.

Performance Highlights

Timely made ethics documents available online

     In fiscal year 2015, OGE continued to timely make ethics documents available on its website. These documents included public financial disclosure reports and ethics agreements, program review reports on agency ethics programs, reports on payments for travel received from non-federal sources in connection with attendance of employees at certain meetings, and written policy guidance. OGE updated its Open Government page to more effectively provide its external stakeholders access to ethics documents and explain the importance of those documents within the executive branch ethics program. OGE also created a page dedicated to Presidential candidate public financial disclosure records and highlighted the availability of these records on its homepage, making these highly sought documents easier to locate and access.

% of ethics documents posted online within established timeframes

	2014	2015
☐ Target	80%	80%
☐ Actual	90%	87%
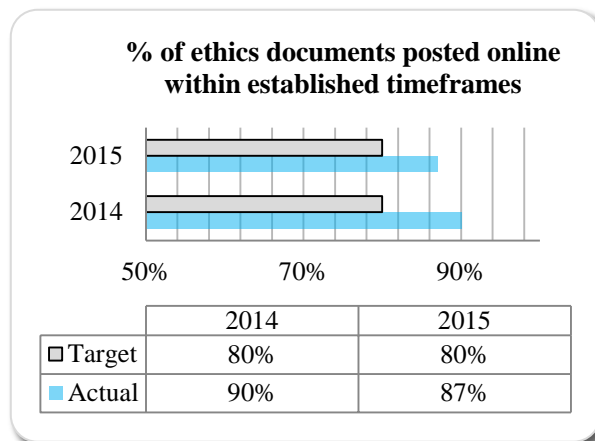
Figure 21: Posting ethics documents

     In addition, OGE continued to use its Twitter account, @OfficeGovEthics, to direct external stakeholders to detailed information on its website and to provide external audiences an additional way to access OGE's latest publications. OGE also used its Twitter account to provide information regarding changes in executive branch ethics laws, regulations, and polices. OGE's making these documents available allows the public to access and review them and to have greater assurance that the systems to identify and resolve conflicts of interest are in place and are effective.

     Performance Goal: OGE exceeded its target to timely post 80 percent of ethics documents online within established time frames.

Analyzed availability of ethics documents

     In fiscal year 2015, OGE completed its analysis of the ethics documents maintained at OGE to identify additional ethics documents that could be posted on its website to promote the public's understanding of OGE's mission and the executive branch ethics program. For example, OGE identified individual agency responses to the Annual Questionnaire (discussed on page 17) as a set of ethics documents of value to the public. As a result, OGE posted for the first time on its public website each individual agency's response to the Annual Questionnaire, in addition to a summary report with aggregate data, and an overview document with key highlights from the aggregate data collected from the Annual Questionnaire. This information helps the public gain a better understanding of the scope and impact of the executive branch ethics program. It also enables external stakeholders to learn more about and assess individual agency ethics programs.

Administered a strong Freedom of Information Act (FOIA) program

In its annual assessment of agency progress in implementing the Attorney General's FOIA Guidelines for 2015, DOJ's Office of Information Policy awarded OGE the highest possible score for having an effective system in place for responding to FOIA requests, increasing proactive disclosures, improving timeliness in responding to requests, and applying a presumption of openness in responding to FOIA requests.

OGE has continually updated its internal FOIA procedures to conform to the OPEN Government Act of 2007, the President's 2009 Memorandum on the FOIA, guidance issued by the DOJ, and best practices. In fiscal year 2015, OGE also completed its update of OGE's FOIA regulation to better reflect OGE's current FOIA practices and overall best practices. After responding to comments through the public notice and comment process, OGE published its final rule in the Federal Register in August 2015.

In addition, to further improve its already strong FOIA program, OGE built a FOIA database. The database improves the efficient tracking of FOIA requests and preparation of FOIA reports. This database has helped OGE's FOIA team operate more efficiently, saving time in entering data and pulling information for annual and quarterly FOIA reports to DOJ's Office of Information Policy. In combination with OGE's recent digitization of its records as discussed on page 52, this database has also made it possible for OGE's FOIA program to operate primarily electronically. The new electronic "records room" application also streamlines the FOIA process as records can be retrieved by date, category, title, or text string.

Planned Work for Fiscal Years 2016 and 2017

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2016 and 2017, OGE will continue to timely post a variety of critical ethics documents on its website, such as agency program review reports and financial disclosure reports of high-level officials.

OGE will also continue to provide timely responses to FOIA requests and maintain a strong FOIA program. In addition, in fiscal year 2016, OGE plans to expand its new FOIA database to include an online portal that will allow requesters to track their FOIA requests in real time. Also in fiscal year 2016, OGE plans to publish a generic information collection request through OMB that would allow OGE to survey its FOIA requesters regarding their experience with OGE's FOIA program. Feedback from requestors will help OGE identify possible areas of improvement for its FOIA program.

Section IV – Managing for Results

This section describes OGE's past and planned work related to its management objectives, the steps OGE has taken to maintain a culture of performance, and OGE's progress toward achieving the President's Management Agenda.

Management Objectives

OGE devotes significant resources toward promoting professional development opportunities for its staff and undertaking process improvement. These two efforts are critical to OGE achieving its mission-focused strategic objectives.

Organized by management objective, this section highlights the major accomplishments that OGE achieved in fiscal year 2015, provides data on OGE's success in achieving its management objectives and performance goals during fiscal year 2015, and describes OGE's planned work for fiscal years 2016 and 2017. Information on how OGE will measure its progress toward achieving its management goals in fiscal years 2016 and 2017 can be found in Appendix A.

Management Objective 4.1: Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities

OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities, as well as support through the dedication of time and resources. In fiscal year 2015, OGE continued its use of a unique professional development process that OGE calls the Employee Development Program (EDP). In addition, OGE created and implemented an intensive financial disclosure training program for its employees in preparation for the upcoming presidential transition.

Performance Highlights

In fiscal year 2015, all OGE employees participated in the OGE Employee Development Program. The EDP incorporates the requirements of OPM's Individual Development Plan but goes further by identifying individual employee learning objectives that must be tied directly to OGE's strategic plan and to the organizational goals of the employee's work unit. The EDP identifies specific formal training, mentoring, self-study, and/or on-the-job training activities that the employee will complete in the covered period. Significantly, the EDP also identifies objective measures for assessing the employee's acquisition of the targeted knowledge or skills. Often, this measurement will involve the employee's completion of a work product or delivery of a presentation related to the training, with the supervisor evaluating the employee's work product or presentation to determine whether the training was effective. The completion of the EDP is part of each employee's performance standards. This mixture of support and accountability has helped OGE to foster both a performance culture and continuous learning.

In addition to the EDP, OGE increased employee knowledge through information sharing and collaboration by conducting bi-monthly employee meetings called Issue Forums. Staff met

at these forums to discuss a wide range of ethics issues, including in-depth analyses of specific ethics laws and regulations. These forums promoted internal communication and cross-functional knowledge sharing among employees at all levels and from all divisions. In addition to these significant investments in internal opportunities for professional development, OGE supported its employees in enhancing their knowledge and skills by sponsoring their participation in external training programs. These programs included classes at the Graduate School USA and the Treasury Executive Institute, as well as events hosted by the federal performance, legal, IT, and communications communities.

OGE also designed and implemented a new training program for recently hired OGE employees who have duties that require them to understand and apply ethics-related legal authorities and engage in the substantive review of financial disclosure reports. New employees were required to complete self-paced, on-demand training using OGE-produced content in the areas of conflicts of interest, impartiality, gifts from outside sources, and the review of public financial disclosure reports. In addition, all new employees were required to attend an in-person debrief of financial disclosure exercises and to attend weekly sessions with OGE instructors to engage in more in-depth discussions of applicable ethics authorities. In these sessions, employees used and discussed key statutory and regulatory authorities, as well as relevant OGE advisory opinions and Office of Legal Counsel memoranda. Employees completed exercises in which they applied various authorities, and they discussed their answers in meetings with trainers. This rigorous combination of independent study followed by small-group instruction and discussion gave the employees a deeper understanding of the key authorities they are required to apply and better prepared them to perform their duties effectively.

Finally, as discussed on page 34, OGE implemented an intensive internal financial disclosure training program to better prepare employees for the upcoming presidential transition. This training was designed to broaden the pool of staff who will be capable of reviewing complex financial disclosure reports when the volume of Presidential nominations is expected to increase significantly following the Presidential election.

Performance Goal: In fiscal year 2015, 100 percent of employees successfully completed their employee development plan.

Planned Work for Fiscal Years 2016 and 2017

In fiscal year 2016, OGE will continue to incorporate the requirements of the EDP into employees' performance standards. In this way, OGE solidifies its commitment to continuous employee learning and professional development. OGE will also continue to identify agency knowledge and skill gaps, and will use the EDP to train employees to fill those gaps. In addition, OGE will continue to provide significant internal and external training and development opportunities to its employees, including agency-wide internal financial disclosure training as mentioned on page 34. OGE will also continue to hold regular "Issue Forums" and other meetings for employees within the agency to share information and to develop and improve their knowledge and skills.

These actions collectively ensure that OGE and its employees will be able to offer the highest quality products and services to its stakeholders and will be prepared to contribute to a successful Presidential transition.

Management Objective 4.2: Transform the way OGE conducts business through process improvement

OGE strives for excellence by continuously reviewing and refining its strategies and processes for achieving its mission. As part of this effort, OGE continues to standardize its procedures and to review them for ways to increase efficiency and effectiveness.

<u>Performance Highlights</u>

Created standard operating procedures

In an effort to work smarter, in fiscal year 2015, OGE continued to review its processes and procedures for ways to make improvements in programs that both support the ethics community and OGE's internal operations. OGE continued to streamline and standardize internal processes and to implement new technological solutions. In fiscal year 2015, OGE developed or updated 20 standard operating procedures. For example, OGE updated its advisory publication process to incorporate procedures for approving and disseminating communications to OGE's external stakeholders regarding each new advisory. This update helps ensure that OGE's external stakeholders are timely made aware of new advisories and are provided key information regarding those advisories. In addition, OGE began creating a new standard operating procedure for onboarding employees.

Performance Goal: OGE exceeded its performance goal to create or revise four standard operating procedures for key agency programs.

Digitized agency records

In fiscal year 2015, OGE completed the digitization of approximately 19,000 paper records containing over one million pages to conserve resources, maximize office space, and streamline OGE's records management process. Moving forward, nearly all records appropriate for retention to meet OGE's business needs and to comply with NARA records schedules will be created, maintained, and managed electronically. All digital records are now made available via the OGE computer network and are accessible to all staff at their computer workstations, both onsite and offsite. Completing this milestone is a significant step toward OGE's compliance with the 2011 President's Memorandum to create and manage all federal records within an electronic records system by December 2018. In addition, the digitization of nearly all records enables OGE to more effectively maintain its records, conduct searches of its records, and timely dispose of records in accordance with the General Records Schedule. For example, OGE's FOIA Team is now able to find responsive records more efficiently, saving time and resources. In addition, the digitization project has been particularly useful in managing the financial disclosure program as discussed on page 19. Lastly, by cutting down on the space needed for storage of paper records,

OGE was able to more efficiently use the space to create common meeting rooms and individual work spaces.

Launched and began development of new technology solutions

In fiscal year 2015, OGE completed a project to replace most of its IT equipment to make the equipment more efficient, reliable, convenient, and secure. More specifically, OGE installed, tested, configured, and deployed a new phone system and zero client desktop boxes. OGE also installed new servers to support the virtual desktop infrastructure (VDI) in addition to a more efficient and reliable Storage Area Network. To improve network communications speed, OGE installed and configured new routers and switches.

In fiscal year 2015, OGE also developed web applications and automated tools that enable the agency to conduct business with greater efficiency and effectiveness. For example, OGE began developing an updated version of its Financial Disclosure Tracking System. Of note, the updated system will reduce the number of steps required to review and approve a financial disclosure report by 18 steps. Additional benefits and features of this system are discussed on page 19.

In fiscal year 2015, OGE began collecting certain required information such as agency travel reports and annual questionnaires through a public-facing web server. This streamlines the data submission process for OGE customers by allowing them to enter required information directly through the website portal, rather than emailing it or using a third-party collection platform. This portal also saves valuable staff time by importing data directly into OGE information management systems, eliminating the time required for document handling. Additionally, it reduced errors by ensuring that documents and data are properly stored. Further, because the new system collects the information in a standardized way, it enables OGE to better analyze agency data and make informed policy decisions.

In fiscal year 2015, OGE took steps to assess its IT security. OGE underwent an independent network security network assessment by the Enterprise Services Center of the Federal Aviation Administration (FAA). As a result of this review, the FAA will update and develop any necessary security policies and documentation. The assessment included a comprehensive review of OGE's IT security program, a physical scan of OGE's network for vulnerabilities, and a review of OGE's policies and documents. In fiscal year 2015, OGE also initiated plans to implement IPv6 and two-factor authentication in accordance with Office of Management and Budget mandates and guidance from the National Institute of Standards & Technology. Currently, OGE's network perimeter security is provided by AT&T and the Department of Homeland Security (DHS) under the Managed Trusted Internet Protocol Service initiative. To supplement these security measures, the National Cybersecurity Assessment and Technical Services (a component of the Department of Homeland Security) performs weekly vulnerability scans of the OGE network perimeter. Scan reports are reviewed by OGE's Chief Information Officer and referred to network administrators and application developers when corrective action is required.

In fiscal years 2016 and 2017, OGE will identify and review at least two processes in each of its divisions, select at least one of these processes from each division for standardization and streamlining, develop and implement action plans for revising the processes, and deploy the revised processes. OGE will also continue to develop internal applications that streamline current processes and improve OGE's multiple data collection efforts. Improved data collection tools will enable OGE to better analyze data and make informed policy decisions for the executive branch ethics program. In addition, OGE will continue to refine and organize its new electronic records room to further improve the maintenance, retrieval, and disposal of OGE records.

Maintaining a Culture of Performance

In fiscal year 2015, OGE pursued its internal communications efforts through a variety of methods. OGE continued to conduct quarterly "all hands" meetings with the entire OGE staff to discuss progress toward meeting agency goals and to promote an understanding of OGE's priorities and direction. OGE also held regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities. OGE held supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

In addition to emphasizing internal communications, OGE took several other steps during fiscal year 2015 to maintain a culture of performance. OGE continued to support a variety of flexible work and telework schedules, with 77 percent of employees reporting they were satisfied with OGE's telework program and 89 percent reporting that they were satisfied with OGE's alternative work schedule options. Furthermore, OPM certified OGE's Senior Executive Service performance management system, which ties employee performance standards to OGE's strategic goals.

To evaluate its progress in maintaining a culture of performance, OGE participated in the executive branch-wide Federal Employee Viewpoint Survey in fiscal year 2015, achieving a 78 percent participation rate. OGE received over 90 percent positive ratings for employees knowing how their work relates to the agency's goals and priorities and for employees being held accountable for achieving results. In addition, the survey shows a 22 percent increase in the number of employees reporting that the results of the survey will be used to make the agency a better place to work, as well as improvements in the areas identified as challenges in 2015.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2016 and 2017 through several initiatives. OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting mid-year strategic objective reviews; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. In addition, OGE will continue to support a variety of flexible work and telework schedules. To evaluate its progress, OGE will analyze results from the Federal Employee Viewpoint Survey.

Support of the President's Management Agenda

In further support of the President's Management Agenda, OGE continued to use the shared services of the Treasury Department's Bureau of the Fiscal Service for all of OGE's non-core administrative support services. OGE also worked toward reducing fragmentation, overlap and duplication, and advancing smarter IT delivery through the development of *Integrity,* its electronic public financial disclosure filing system that is now available to all executive branch agencies free of charge. The system is described on page 35.

Section V – Conclusion

OGE will use its fiscal year 2017 budget request to support the agency's important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business impartially by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in this justification for fiscal year 2015, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals. Further, as is amplified in this justification, OGE will employ its fiscal year 2017 resources to make significant strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program; contributing to the continuity of senior leadership in the executive branch; and promoting transparency of the executive branch ethics program. OGE will also employ its fiscal year 2017 resources to advance its management goal of creating and promoting a culture of performance.

Appendix A – Fiscal Year 2016 and 2017 Performance Goals

OGE PERFORMANCE GOALS			
Strategic Goal 1: Advance a strong, uniform executive branch ethics program			
	Performance Goal	**Fiscal Year 2016 Target**	**Fiscal Year 2017 Target**
Strategic Objective 1.1 *Interpret and advise on ethics laws, policies, and program management*	Legal and program advisories help ethics officials perform their job duties.	80%	80%
	Ethics officials believe OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps ethics officials perform their job duties.	80%	80%
Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE are closed within established time frames.	90%	90%

Strategic Objective 1.2 *Hold executive branch agencies accountable for carrying out an effective ethics program*	In cases in which OGE identifies program weaknesses, OGE's program review results in improvements in the agency's ethics program.	75%	80%
	Ethics agreement compliance occurs within the established time frame.	90%	90%
Strategic Objective 1.3 *Contribute to the professional development of ethics officials*	Ethics officials use training products made available by OGE.	80%	80%
	After participating in an OGE training event, ethics officials better understand the subject matter presented.	90%	90%
	After participating in an OGE training event, ethics officials believe they can more effectively perform their job functions.	90%	90%

Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch			
	Performance Goal	**Fiscal Year 2016 Target**	**Fiscal Year 2017 Target**
Strategic Objective 2.1 *Provide assistance to the President and the Senate in the nomination process of Presidentially-appointed, Senate-confirmed nominees*	Identifiable, substantive conflicts of interest of Presidential nominees for Senate confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination.	90%	90%
	OGE successfully resolves technical reporting issues in the financial disclosure reports of Presidential nominees for Senate confirmed appointments no later than five days after nomination.	90%	90%
	User satisfaction with support provided by OGE on its electronic filing system.	Establish Baseline	-
	OGE's electronic filing system is processing financial disclosure reports.	30% of public financial disclosure filers 25% of executive branch agencies Nominee functionality available for filer use	85% of PAS/DAEO public reports 60% of executive branch agencies 100% of nominee public reports as designated by the White House

	Performance Goal	Fiscal Year 2016 Target	Fiscal Year 2017 Target
Strategic Objective 2.2 *Promote leadership support of the executive branch ethics program*	Agency leaders demonstrate support of the ethics program.	85%	85%
Strategic Objective 2.3 *Support succession planning in the executive branch ethics programs*	Agencies are actively engaged in succession planning to ensure long-term continuity of ethics programs.	90%	90%

Strategic Goal 3: Promote transparency of the executive branch ethics program			
	Performance Goal	**Fiscal Year 2016 Target**	**Fiscal Year 2017 Target**
Strategic Objective 3.1 *Raise the visibility of the executive branch ethics program and OGE*	Increase the number of external stakeholders that are aware of OGE and the executive branch ethics program.	community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles	. community size and growth (social media) # of speaking engagements (including ITA) # of requests for assistance from non-federal sources # of unique views on website # of mentions in media articles

	Ethics documents are posted online within established time frames.	80%	80%
Strategic Objective 3.2 *Ensure that ethics information is publicly available*			

Management Objectives			
	Performance Goal	**Fiscal Year 2016 Target**	**Fiscal Year 2017 Target**
Management Objective 4.1 *Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities*	OGE employees participating in the Employee Development Program successfully complete their employee development plans.	95%	95%
Management Objective 4.2 *Transform the way OGE conducts business through process improvement*	Create or revise standard operating procedures for key agency programs.	4	4

Changes to OGE's Performance Goals

The table above reflects OGE's addition of one new performance goal for fiscal years 2016 and 2017. OGE reviewed its performance goals and changed them to more accurately capture the agency's current work priorities and to ensure that the goals are appropriately outcome oriented. The specific reason for the change is described below.

New Performance Goal Established for Fiscal Years 2016 and 2017

- *User satisfaction with support provided by OGE on its electronic filing system.* This performance goal was added to capture OGE's efforts to provide agencies with superior support on its electronic filing system.