

# ANNUAL PERFORMANCE REPORT



OGE  
U.S. OFFICE OF  
GOVERNMENT  
ETHICS



FISCAL  
YEAR  
2023



## MISSION

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

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# Section I - About U.S. Office of Government Ethics

## OGE’s Mission

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.



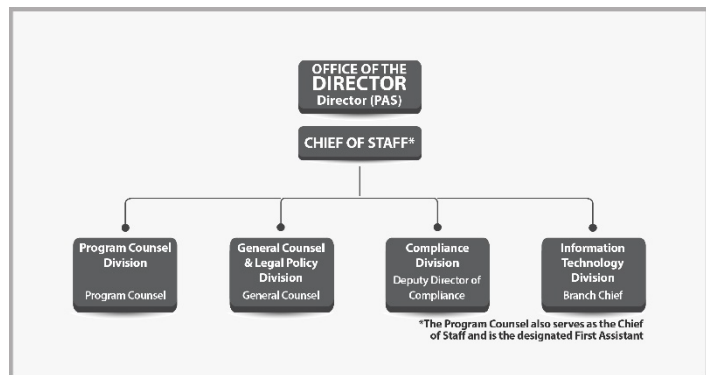
Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 140 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

## Organizational Structure

*Office of Government Ethics: A Small but Agile Agency*

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five-year term by the President after confirmation by the Senate. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE’s career Chief of Staff and senior leadership, who work in concert to carry out OGE’s mission.



## *OGE and Executive Branch Agencies: A Shared Responsibility*

Maintaining the trust of the citizens OGE serves is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.

The head of each executive branch agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.



The head of each agency is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE.

Each agency's employees, including supervisors, human capital officials, and the agency's Inspector General, play a significant role in maintaining the integrity of government programs and operations.

Further, OGE and ethics officials across the government are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigations of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

## Section II - Fiscal Year 2023 Performance Highlights

### GOAL 1: Advanced a Strong, Consistent Executive Branch Ethics Program

**Expert Support:**  
Responded to **900** agency requests and **13** requests from Inspectors General offices

Briefed **18** foreign delegations comprising **156** individuals representing **80** countries


**Professional Development:**  
Nearly **4,500** registrations

*Executive Education:*  
Delivered direct multi-day orientations to **45** new ethics leaders


*Continuing Ed:*  
Maintained an on-demand library of **~150** videos watched **27,700** times

Conducted **47** lectures, workshops, and interactive trainings


**Guidance:**  
Issued **20** Legal and Program advisories



**Financial Disclosure:**  
Securely, operated *INTEGRITY*, the executive branch e-filing system for more than **90%** of the **27,000** public financial disclosure filers and **39,000** users



**Guidance:**  
Published the Legal Expense Fund regulation and **5** supplemental regulations

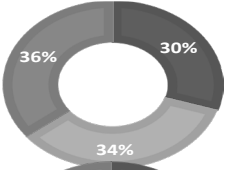


### GOAL 2: Held the Executive Branch Accountable for Carrying Out an Effective Ethics Program

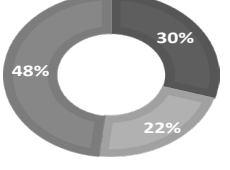
### GOAL 3: Helped Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership

**Program Reviews:**  
Conducted **42** reviews resulting in **121** recommendations

**12** follow-up reviews resulting in **48** recommendations closed




**3-year cycle**

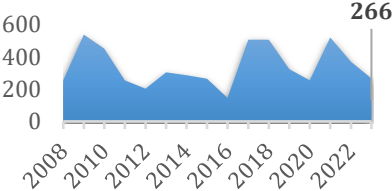


**4-year cycle**

**Annual Data Call:**  
**100% Compliance** from **140 agencies**



**# of Nominee Financial Disclosure Reports (Prcleared)**



Reviewed **28** financial disclosure reports of Presidential candidates

### GOAL 4: Used Transparency to Further the Oversight of the Executive Branch

**Certificate of Divestitures (CDs):** Issued **269** CDs

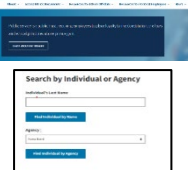
**Conflict of Interest Waivers:** Consulted on approximately **60** waivers

**Annual Public Financial Disclosure:**  
Timely conducted second level review of **1,000+** reports

**Transparency:**  
Nearly **1.4M** pageviews of OGE's website

Released over **13,000** ethics documents

Responded to over **100** FOIA requests



**Freedom of Information (FOIA)**

OGE respects the Freedom of Information Act. Privacy of information is not a concern. www.foia.gov

**Crosscutting Objective: Advance equity in OGE's programs and improve diversity, equity, inclusion, and accessibility in OGE's operations.**



**Equity:**

*Ethics Education:* Held **6** Inclusion/Accessibility workshops for **100** ethics officials

*Ethics Documents:* Translated key ethics documents and simplified instructions

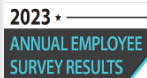
**DEIA:**

*Ethics Officials:* Developed a new executive branchwide mentoring program

*Procurement:* **99%** of contracts and **33%** of micro purchases made from small/disadvantaged businesses

**Stewardship: Sustained a high-performing, cross functional staff**

**Stewardship: Leveraged technology to increase efficiency and effectiveness**



*Engagement:* **90%** on the FEVS Employee Engagement Index. **Top 3 most engaged workforce in the executive branch**

*Hiring:* Onboarded **6** new employees

*Workforce Development:* **100%** of employees participated in the employee development program

Replaced **all** end-of-life IT equipment

Began migrating to a FedRAMP cloud service provider (completed in October 2023)

Built and maintained **numerous** custom applications for key mission areas and internal operations

**Stewardship: Safeguarded the government resources entrusted to OGE**



*Fiscal:* Received an **unmodified opinion** from its independent financial audit

*Facilities:* Reduced our HQ footprint by **70%**, resulting in **\$1,096,000** cost savings

*Records:* Digitized **all** remaining paper records

*Privacy:* Documented the privacy protections necessary for essential agency programs, including the new legal expense fund program

*Cybersecurity:* "Managing risk" for the **majority** of categories on the Cybersecurity Risk Management Assessment and **100%** of employees trained on cybersecurity

## Section III - Fiscal Year 2023 Performance Report

It is OGE’s mission to safeguard the integrity of executive branch programs and operations and to increase public confidence in the impartiality of government decision-making. This important mission is translated into OGE’s strategic goals and objectives. OGE’s success in achieving these strategic goals and objectives is measured by its progress on established performance goals. In fiscal year 2023, OGE successfully continued delivering its mission-critical work. This section highlights OGE’s major accomplishments and progress toward achieving its strategic objectives in fiscal year 2023, as measured by its performance goals.<sup>1</sup> In fiscal year 2023, OGE met or exceeded 100 percent (100%) of its performance goals.

STRATEGIC GOAL I	STRATEGIC GOAL II	STRATEGIC GOAL III	STRATEGIC GOAL IV
<p><b>Advance a Strong, Consistent Executive Branch Ethics Program</b></p> <p><b>Strategic Objective 1.1:</b> Provide expert guidance and support to ethics officials and other stakeholders.</p> <p><b>Strategic Objective 1.2:</b> Strengthen the expertise of officials who are integral to the executive branch ethics program.</p> <p><b>Strategic Objective 1.3:</b> Continuously refine ethics policy and issue interpretive guidance.</p> <p><b>Strategic Objective 1.4:</b> Lead the financial disclosure program and provide the executive branch e-filing system, <i>Integrity</i>.</p>	<p><b>Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program</b></p> <p><b>Strategic Objective 2.1:</b> Monitor agency compliance with executive branch ethics program requirements.</p> <p><b>Strategic Objective 2.2:</b> Monitor senior leaders’ compliance with individual ethics responsibilities and commitments.</p> <p><b>Strategic Objective 2.3:</b> Use OGE’s authorities to address known or potential ethics risks.</p>	<p><b>Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership</b></p> <p><b>Strategic Objective 3.1:</b> Carry out OGE’s statutory role in preparing for and supporting Presidential transitions.</p> <p><b>Strategic Objective 3.2:</b> Assist the President and the Senate in the Presidential appointments process.</p> <p><b>Strategic Objective 3.3:</b> Foster ethical leadership in senior officials.</p>	<p><b>Use Transparency to Further the Oversight of the Executive Branch</b></p> <p><b>Strategic Objective 4.1:</b> Make ethics information publicly available.</p> <p><b>Strategic Objective 4.2:</b> Reach a broader array of stakeholders.</p>
<p><b>Crosscutting Objective 5.1:</b> Advance equity in OGE’s programs and improve diversity, equity, inclusion, and accessibility in OGE’s operations.</p>			
<p><b>Stewardship Objective 6.1:</b> Sustain a high-performing, cross-functional staff.</p> <p><b>Stewardship Objective 6.2:</b> Leverage technology to increase efficiency and effectiveness.</p> <p><b>Stewardship Objective 6.3:</b> Safeguard the government resources entrusted to OGE.</p>			

<sup>1</sup> The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual agency ethics program questionnaire, website analytics, and an annual survey of ethics officials to assess satisfaction with OGE’s services and products.



## Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program

OGE was created to prevent conflicts of interest on the part of executive branch employees. To achieve its strategic goal of advancing a strong, consistent executive branch ethics program, OGE developed four strategic objectives. These objectives are: (1.1) Provide expert guidance and support to ethics officials and other stakeholders; (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program; (1.3) Continuously refine ethics policy and issue interpretive guidance; and (1.4) Lead the financial disclosure program and provide the executive branch e-filing system, *INTEGRITY*.

*The absence of a strong, consistent executive branch ethics program with clear rules, guidance, support, training, and financial disclosure could lead to ethical lapses, improper use of taxpayer funds, and a loss of public confidence in government.*

### Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders

OGE achieved its objective of providing expert guidance and support to stakeholders in fiscal year 2023 through quality Desk Officer services, communications with ethics officials and other external stakeholders, and support for the work of the enforcement and international communities. Key highlights of OGE's work are described below.

*Supplied ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agencies' leaders and employees*

OGE provides extensive support to agency ethics officials so they can provide consistent and effective ethics guidance to the more than 2.1 million federal employees in the executive branch who serve the American people. This support includes providing timely, expert advice on applying the ethics laws and regulations, as well as furnishing other resources ethics practitioners need to do their jobs effectively. In fiscal year 2023, OGE Desk Officers responded to 900 calls for assistance. Thirty-four percent (34%) of those requests were related to public financial disclosure. Desk Officers helped ethics officials navigate difficult policy and programmatic issues and proactively provided those officials with resources and services to assist them.

In fiscal year 2023, OGE’s Director sent a welcome letter to each new Designated and Alternate Designated Agency Ethics Official (DAEO/ADAEO). This letter provided critical details about their important roles, responsibilities, and professional development

opportunities, including OGE’s DAEO/ADAEO orientation program, and the array of resources OGE provides to support them. Also, OGE Desk Officers met with new agency ethics officials to provide an overview of ethics program requirements and to offer OGE’s services.



*DESK OFFICER ASSISTANCE*

**Performance Goal:** OGE measured the performance of the Desk Officer program by surveying ethics officials who requested assistance during fiscal year 2023. Eighty-nine percent (89%) of survey

respondents indicated that Desk Officers helped them to perform their job duties. Target: 80% | Actual: 89%

*Communicated helpful, written guidance that was widely disseminated*

In fiscal year 2023, OGE continued to provide ethics officials with up-to-date ethics information so that they can carry out effective programs for the employees they serve. OGE published advisories and other guidance in a searchable format on its [website](#), and provided notices of new guidance via the OGE listserv, which reaches approximately 3,100 ethics officials and ethics support staff. OGE also continued to host quarterly meetings with senior agency ethics officials to inform them of new guidance, resources, requirements, and trends. In fiscal year 2023, OGE’s Director published a [video message](#) to provide the ethics community a look ahead to ethics developments throughout the year.

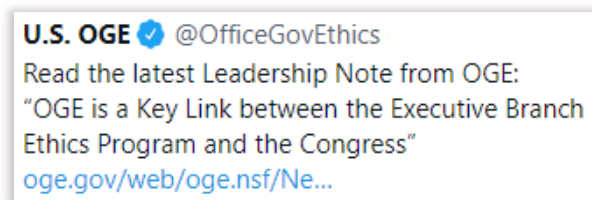
**Indicators:**

- 58% of ethics officials on the listserv
- 114 listserv messages

*Responded to requests for expert advice from critical stakeholders*

OGE continued to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, consistent understanding of the executive branch ethics program.

OGE serves as the legislative liaison with Congress for the executive branch ethics program. OGE works to build congressional understanding of the program, to inform congressional oversight, and to provide technical expertise on proposed revisions to ethics laws. Notably, OGE [responded](#) to several complex inquiries from members of Congress and provided 25 consultations in response to requests for technical assistance on draft legislation and a wide variety of executive branch ethics issues. During the fiscal year, OGE also tracked 110 bills of relevance to the executive branch ethics program introduced in the 118th Congress.



OGE also represented the executive branch ethics community by providing ethics expertise on 27 requests for comment on legislative materials and Executive Orders and Presidential Memoranda circulated by the Office of Management and Budget (OMB). OGE achieved a 100 percent (100%) success rate for timely responding to OMB deadlines for all of the requests OGE received.

*Supported the vital work of the ethics enforcement communities*

OGE supports the vital work of the ethics enforcement communities, including Inspectors General and the Department of Justice, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules. OGE responded to 13 requests for expert consultations from Inspectors General offices, as well as participated actively as a member of the Council of Inspectors General on Integrity and Efficiency (CIGIE). Additional information on the training OGE provides to the enforcement communities is on page 12.

*Participated actively in U.S. government anti-corruption efforts*

OGE supports U.S. anti-corruption foreign policy by (1) assisting the State Department in ensuring that the U.S. meets its international anti-corruption obligations, (2) supporting U.S. participation in organizations that shape anti-corruption norms, and (3) supporting other countries' efforts to effectively manage conflicts of interest.

**U.S. Office of Go...** @Off... · Jan 12 ...  
This week, OGE staff met with an IVLP delegation from the Middle East and North Africa to discuss transparency and accountability in government.

In fiscal year 2023, OGE assisted the State Department in ensuring that the U.S. met its anti-corruption obligations by participating in two multilateral peer reviews, pursuant to anti-corruption treaties, and reviewing approximately 71 anti-corruption reports, declarations, resolutions, and policy papers. For example, in fiscal year 2023, OGE and the Department of Justice met with evaluators from *Groupe d'États Contre la*

*Corruption* (GRECO) to assist in their review of preventing corruption and promoting integrity in top executive functions in the United States.

OGE continued to meet with foreign public and private sector groups about the executive branch ethics program to discuss how the ethics program fits into the broader context of anti-corruption, good governance, and transparency. In fiscal year 2023, OGE briefed 18 foreign delegations comprising 156 individuals representing 80 countries.

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

OGE strengthened the expertise of officials who are integral to the executive branch ethics program by conducting virtual learning events, maintaining an extensive library of ethics resources, and educating other officials that are integral to the executive branch ethics program.

*Prepared ethics officials at all levels to train, advise, and support their employees and further their agencies' missions*

Well-trained ethics officials help agency leaders and employees manage risks every day. Ethics officials must have the knowledge, skills, and abilities necessary to provide expert counsel, identify and resolve conflicts of interest, deliver quality training, and manage effective programs, making their ongoing professional development vital to the strength of the ethics program. In fiscal year 2023, OGE published an [advisory](#) with a comprehensive guide to professional development opportunities in ethics.



In fiscal year 2023, OGE provided the following for ethics officials:

*Orientations:* OGE conducted two multiday orientations for new DAEOs and ADAEOs to introduce them to their roles and responsibilities as ethics program leaders. Nearly 45 senior officials participated in these training sessions.

*Virtual Library:* To ensure that ethics officials across the nation have access to OGE's training, OGE continued to broadcast its virtual training sessions through social media platforms and made them publicly available through OGE's website. In fiscal year 2023, training videos were collectively viewed nearly 27,700 times, with an average duration of 17 minutes.

*Created new professional development opportunities for ethics officials*

In fiscal year 2023, OGE launched four new offerings: (1) Accelerated Certification in Ethics (ACE); (2) Skill Builders; (3) the Annual Professional Ethics Practitioner (PEP) Certificate; and (4) Interactive Trainings.

*ACE:* OGE developed ACE for new and aspiring ethics officials to be able to support all aspects of an executive branch ethics program. Over four months, the virtual program provided a comprehensive introduction to all aspects of the ethics program, including program administration and leadership, advice and counsel, financial disclosure, and education and communication. OGE saw a high level of interest in the program, as demonstrated by the number of applications OGE received—63 from 55 agencies—to attend ACE. In fiscal year 2023, 29 ethics officials from 24 agencies successfully completed this intensive program and were awarded certificates.

*Skill Builders:* OGE developed Skill Builders for ethics officials and others who support the ethics program to build their skills in a particular program area or add to their ethics competencies. In fiscal year 2023, OGE offered two Skill Builders attended by 154 participants on topics such as confidential financial disclosure. After participating in the program, 100 percent of ethics officials said they were better able to do their job.

**Milestone:** OGE met its milestone to deliver one Skill Builder and one Accelerated Certification in Ethics.

*Annual PEP Certificate:* OGE designed the annual PEP certificate for ethics officials who are performing some or all functions of an ethics program at full competency and who wish to maintain their skills and stay current with policy changes and developing practices in the ethics profession. By offering an annual certificate, OGE signals an expectation of ongoing professional development by ethics officials. Participation enables ethics officials to demonstrate their commitment to the practice of ethics. In fiscal year 2023, OGE held a variety of PEP offerings with topics including the use of social media, letters of recommendation, and navigating OGE’s website. In fiscal year 2023, OGE issued 232 certificates to ethics officials from 45 agencies.

Date	OGE Offerings I Attended/Watched in 2023
1	
2	
3	
4	
5	
★ 6	

Date	Additional OGE Offerings I Attended/Watched in 2023
7	
8	
9	
10	

*Interactive Trainings:* In support of the new annual PEP certificate, OGE created a new type of educational offering: interactive training. These interactive trainings, on

a wide range of ethics topics, followed a new model that included a recorded lecture followed by an opportunity to participate in a live, virtual debrief of a practical exercise to apply the content covered in the recorded lecture. A recorded debrief of the exercise is made available for those unable to participate in the live debrief. These interactive trainings are in addition to recorded trainings, curricula, and workshops already offered by OGE. In fiscal year 2023, OGE conducted 10 interactive trainings for nearly 500 ethics officials.

**Performance Goal:** OGE exceeded its goal of the percent of ethics officials who believe they can more effectively perform their job duties after participating in an OGE event. Target: 80% | Actual: 94%

*Created opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies*



In fiscal year 2023, OGE continued to create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies. For example, OGE held 22 workshops for more than 435 ethics officials to discuss practices for implementing different aspects of their program. In fiscal year 2023, OGE also held a monthly “flash networking” series to provide ethics officials with an opportunity to build their

professional networks. OGE held 13 sessions, which were attended by approximately 200 individuals. One ethics official said, “I like that I got to connect with some of the newer folks to impart some of my experiences, and with people from very different agencies to learn about their ethics programs.”

*Improved the delivery and content of ethics education at agencies, including a focus on equity*

As part of OGE’s Equity Action Plan in fiscal year 2023, OGE shared resources and held four virtual workshops with ethics officials on how to incorporate inclusivity and accessibility principles into the delivery of ethics education to their agencies’ employees. Sixty-four ethics officials from 28 agencies participated in the workshops.

*Educated other officials who are integral to the executive branch ethics program*

In support of OGE’s goal of a strong, consistent ethics program, OGE provided advice and training to the various enforcement communities. In fiscal year 2023, OGE routinely assisted Inspectors General and



prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations. OGE also provided an array of training to Inspectors General, including well-received training to 40 attendees at the Inspector General Criminal Investigator Academy, focusing on investigating ethics-related matters and working with ethics officials.

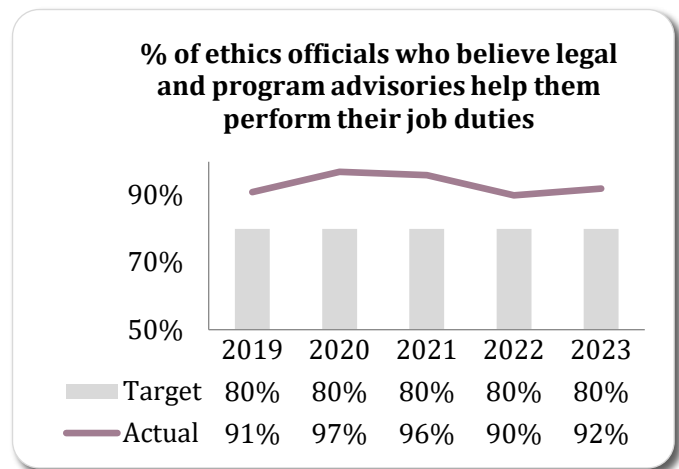
**Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance**

In fiscal year 2023, OGE continued to review, refine, and issue interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE’s work are described below.

*Provided timely ethics guidance*

In fiscal year 2023, OGE issued 14 legal advisories, and 6 program advisories. The legal advisories provided guidance on emerging ethics issues, such as [cryptocurrency](#), [ethics legislation](#), [official social media use](#), and the [recodification](#) of the Ethics in Government Act. The program advisories covered ethics program requirements. Relatedly, OGE also published the Compilation of Federal Ethics Laws. OGE used its listserv, website, Desk Officer services, and training broadcasts to ensure its guidance was widely disseminated. In developing advisories, OGE continued to use an evidence-based approach to determine topics, as well as to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance.

**Performance Goal:** OGE exceeded its goal for the percentage of ethics officials who believe advisories helped them perform their job duties.  
Target: 80% | Actual: 92%



*ADVISORIES*

*Published proposed and final ethics rules*

In fiscal year 2023, OGE published a final [regulation](#) governing legal expense funds (LEF) for executive branch employees. OGE received nearly 7,000 comments to the proposed rule. Each comment was considered and is addressed in the [preamble](#) to the final rule. This new rule creates standards for an executive branch





employee's acceptance of payments for legal expenses through a legal expense fund, as well as an employee's acceptance of *pro bono* legal services. These standards apply for legal matters that arise in connection with the employee's current or former official position, the employee's prior position on a campaign of a candidate for President or Vice President, or the employee's prior position on a Presidential Transition Team.

In fiscal year 2023, OGE also published a [proposed rule](#) to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards). The proposed amendments seek to update the Standards based on OGE's experience gained from application of the regulation since its inception, and to include the principles contained in Executive Order 13985 to advance equity. The proposed amendments also incorporate past interpretive guidance and add and update regulatory examples to make them more inclusive, improve clarity, update citations, and make technical corrections.

OGE also conducted an in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions (5 CFR part 2640), including soliciting feedback from ethics officials.

**Milestone:** OGE met its milestone to complete an in-depth review of 5 CFR part 2640.

*Evaluated and responded to requests from agencies to tailor their ethics programs*

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 2023, OGE jointly issued revisions to five supplemental regulations (DoD, VA, SEC, FMCS, USPS), and worked on supplemental regulations for a number of other agencies, including the National Transportation Safety Board and the Export-Import Bank.

## Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, *INTEGRITY*

In fiscal year 2023, OGE operated *INTEGRITY*, maintained and updated key financial disclosure forms, and provided key financial disclosure resources. Highlights of OGE's work are described below.

*Operated INTEGRITY, the executive branch e-filing system for more than 90% of public financial disclosure filers*

OGE worked to ensure that [INTEGRITY](#) continued to reliably and securely operate for the high volume of nominees using the system during the post-election period and the thousands of current filers and reviewers who rely on the web-based system every year, at no cost. As with every year, OGE also underwent and successfully completed an independent security review. In addition, OGE continued to convene quarterly *INTEGRITY* Advisory Council meetings to provide a forum for agencies to discuss and prioritize upgrades to the system. As a result of this process, OGE made 37 enhancements, including 6 that were recommendations of the *INTEGRITY* Advisory Council. For example, OGE made adjustments to agencies' ability to bulk download filings in order to assist them in better responding to large information requests from the public.



**Milestone:** OGE met its milestone to address all independent security review findings.

*Provided extensive support to users of INTEGRITY*

OGE continued to provide high-quality support for users and agencies to the system's more than 39,000 users (filers, administrators, and reviewers) by providing outstanding Help Desk services, making available training resources and tutorials, and providing regular training opportunities for both new and experienced users through monthly webinars. In fiscal year 2023, OGE engaged in outreach to the user agency community by administering an annual User Support Survey, which allowed agency *INTEGRITY* administrators to provide feedback on *INTEGRITY* assistance, resources, and training.

**Performance Goal:** OGE exceeded its goal for the percentage of agency administrators who are satisfied with the support provided by OGE on its electronic public financial disclosure filing system. Target: 80% | Actual: 97%

### *Maintained and updated uniform public and confidential financial disclosure forms*

OGE is responsible for maintaining uniform public and confidential ethics forms for use across the executive branch. To carry out this responsibility, OGE conducts periodic review, revision, and solicitation of stakeholder input prior to requesting renewal of an



U.S. Office of Go... @Off... · Jan 19 ...  
Today, OGE held a public meeting to gather input concerning potential improvements to the public and confidential financial disclosure forms.

existing form or creation of a new form. In fiscal year 2023, OGE reviewed OGE Form 201 (release of ethics documents) and Executive Branch Qualified Trust documents. OGE made several changes to Form 201, with the goals of making the form more appropriate for use throughout the executive branch and providing requesters with clarifying information about the use of the

form. In fiscal year 2023, OGE also began the review process for both the public (OGE Form 278e) and confidential (OGE Form 450) financial disclosure forms, and conducted an extensive feedback process with stakeholders. In addition to work on renewal of existing forms, OGE sought and received OMB approval for new forms that will be used in connection with OGE's legal expense fund regulation.

### *Provided guidance on the public and confidential financial disclosure programs*

OGE published updated versions of both of its key financial disclosure resources: the Public and Confidential Financial Disclosure Guides. The Guides are interactive tools to assist individuals who file or review either the public financial disclosure (OGE Form 278e) or confidential financial disclosure (OGE Form 450). OGE also provided targeted training, as well as workshops for individuals with a role in the public and confidential financial disclosure systems.

**Performance Goal:** Ninety-three percent (93%) of ethics officials believed financial disclosure resources provided by OGE (e.g., the Public Financial Disclosure Guide, Confidential Financial Disclosure Guide, Financial Disclosure Playlist, etc.) assist reviewers of financial disclosure reports.

**Milestone:** OGE met its milestone to update the Confidential Financial Disclosure and Public Financial Disclosure Guides.

### *Evaluated and responded to requests from agencies to use alternative financial disclosure forms*

In fiscal year 2023, OGE evaluated and responded to four requests from agencies to use alternative financial disclosure forms. Because of special or unique agency circumstances, the alternative procedure approval process is intended to provide an agency with the most effective tools possible for preventing and detecting conflicts of interest. For example, an agency may have separate authority to collect information under OGE-approved supplemental ethics regulations or specific statutory authority.

## **Strategic Goal 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program**

As the supervising ethics office of the executive branch, OGE is responsible for conducting oversight to ensure that each of the more than 140 executive branch agencies has a compliant ethics program and that senior leaders fulfill their ethical commitments. OGE's work in this area is vital, because when an ethics program fails or a senior leader fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective ethics program, OGE has developed three strategic objectives: (2.1) Monitor agency compliance with executive branch ethics program requirements; (2.2) Monitor senior leaders' compliance with individual ethics responsibilities and commitments; and (2.3) Use OGE's authorities to address known or potential ethics risks.

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

In fiscal year 2023, OGE continued to conduct reviews of agency ethics programs and to collect data about each agency's program and the overall executive branch ethics program. OGE also continued to request ethics program data from agencies to address in real time issues that require oversight. Key highlights of OGE's work are described below.

#### *Identified program weaknesses (non-compliance) with ethics program requirements on an accelerated review cycle*

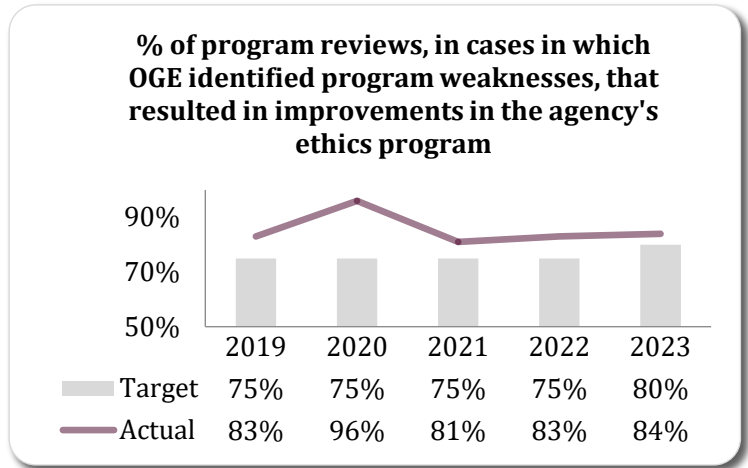
OGE conducts agency ethics [program reviews](#) as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch.

OGE reviews agency programs to identify and report on the strengths and weaknesses of the programs by evaluating (1) agency compliance with ethics requirements established in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. OGE examines all elements of an agency ethics program, including: program administration; financial disclosure; education and training; ethics counseling; agency-specific ethics rules on outside employment; conflict remedies; enforcement; and special government employees.

When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation directing the agency to take actions necessary to correct

the deficiency. OGE then conducts a follow-up review to evaluate the agency’s progress in implementing any recommendations made in OGE’s program review report. To enhance transparency and accountability, OGE continues to [publish](#) all program reviews and follow-up program reviews on its website.

OGE conducted 42 program reviews resulting in 121 recommendations. OGE also found 22 additional deficiencies that would have resulted in recommendations had they not been corrected prior to the completion of OGE’s review. OGE provides considerable technical assistance to agencies in correcting problems as part of its program review process, which may allow an agency to take immediate action and preclude the necessity of OGE issuing a recommendation.



*PROGRAM REVIEW RECOMMENDATIONS*

In fiscal year 2023, OGE conducted 12 follow-up reviews to assess agency compliance with 61 recommendations. OGE found agencies had taken action sufficient to justify closing 48 recommendations. Each quarter, OGE posted [dashboards](#) displaying the number of open program review recommendations at the end of each quarter.

Target	Actual
3-year cycle - 32 agencies reviewed	3-year cycle - 30 agencies reviewed
4-year cycle - 10 agencies reviewed	4-year cycle - 12 agencies reviewed

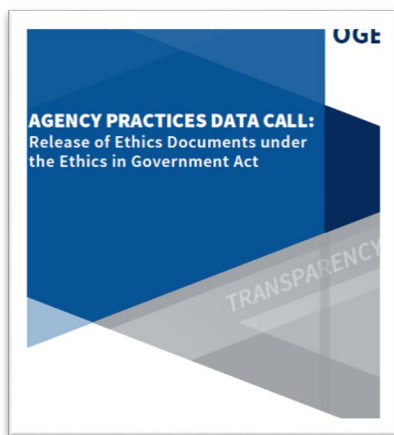
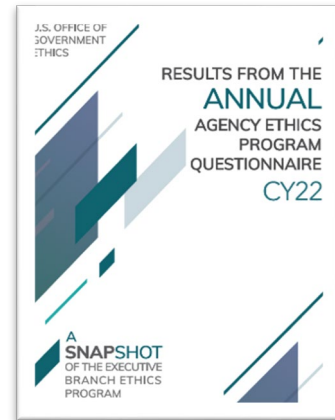
**Performance Goals:** OGE met its target to review 42 agencies.

In cases in which OGE identified a program weakness during a program review, OGE exceeded its target for the percentage of program reviews that

resulted in improvements in the agency’s ethics program. Target: 80% | Actual: 84%

*Collected, evaluated, published, and took action based on executive branch ethics program data*

As part of OGE’s oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects the data through its [Annual Agency Ethics Program Questionnaire](#). In fiscal year 2023, OGE attained 100 percent compliance from the more than 140 agencies required to submit their data. OGE thoroughly reviewed responses and followed up with agencies, as needed. OGE then continued its practice of publishing a summary report of the aggregate data and posting individual agency responses on its website to increase transparency and oversight. OGE also continued to use the data to provide training on the results, and to encourage agencies to use the questionnaire, both as a self-assessment tool and to benchmark their own agency against similarly situated agencies.



In addition, in fiscal year 2023, OGE published the results of its triennial Data Call for Agency Practices. This data call focused on agency practices for fulfilling requests for ethics documents released under the Ethics in Government Act. The results of this data call provided OGE with insight into each agency’s implementation of this key element of their ethics program. OGE uses the data to tailor the guidance and support it provides to agencies. OGE made the results of the data call available to the public in a summary report posted on its [website](#) and shared the results with executive branch ethics officials so they can learn from other ethics program practitioners.

OGE also continued to serve as the repository for biannual reports (1353 Travel Reports) that document payments of travel accepted from non-federal sources. Although OGE has no role in providing guidance on the travel regulations, OGE makes these reports available, as required by statute, on its website.

*Collected, analyzed, and published information on potential ethics violations by executive branch employees*

Agencies are required to concurrently notify OGE’s Director when referring any matter to the Department of Justice involving a potential violation of a criminal conflict of interest law by an executive branch employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action if prosecution is declined. While OGE primarily works to give the public reasons to trust their government, OGE also acknowledges when officials violate that trust. For example, OGE annually publishes a [survey of ethics-related prosecutions](#), which shows the consequences for failing to abide by the ethics laws and regulations. In fiscal year 2023, OGE also continued to post [quarterly dashboards](#) displaying information regarding referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.

**Strategic Objective 2.2: Monitor senior leaders’ compliance with their individual ethics responsibilities and commitments**

In fiscal year 2023, OGE continued to monitor agency leaders’ compliance with their ethics agreements and provided a second-level review of the most senior officials’ financial disclosure reports. Key highlights of OGE’s work are described below.

*Collected and published documentation of senior agency leaders’ compliance with their individual ethics commitments*

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE
	b. Position Title:	to be completed by OGE
	c. Agency:	to be completed by OGE
	d. Date Ethics Agreement Signed:	to be completed by OGE
	e. Date Confirmed:	to be completed by OGE
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE

In fiscal year 2023, OGE continued its efforts to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office by monitoring compliance with the commitments in their ethics agreements. OGE continued to collect a Certification of Ethics Agreement Compliance from each appointee, which requires each appointee to personally attest that they have complied with the

terms of their ethics agreement. In support of transparency and accountability, OGE [posts these certifications](#), as well as notices of late compliance and extensions, on its website. In the event that a PAS official is more than 30 days late in submitting their Certification or submits a Certification that indicates a substantive deficiency in complying with the terms of their ethics agreement, OGE will notify the Senate committee of jurisdiction, as

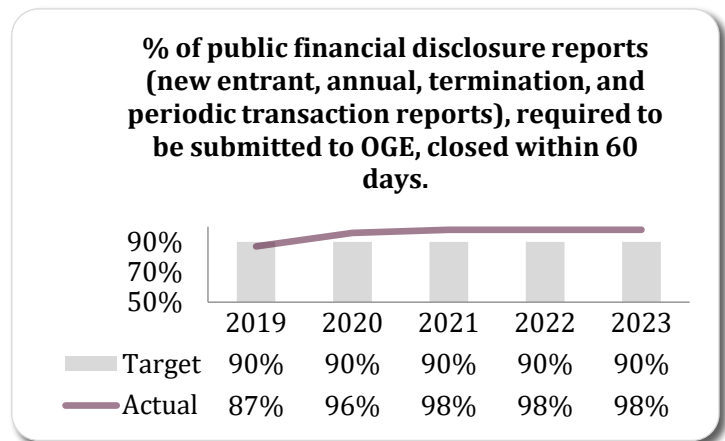
appropriate.

In fiscal year 2023, 179 PAS appointees were required to certify that they had complied with their ethics agreements. OGE received certifications from all 179 and 174 (97%) were submitted timely.

*Conducted expert second-level reviews of senior agency leaders' periodic and annual financial disclosure reports*

OGE continued to collect and review the periodic transaction, annual, and termination reports of PAS filers to ensure that filers continue to comply with their ethics agreements and that agencies timely review these disclosures for conflicts of interest. In fiscal year 2023, OGE closed 1,882 reports. OGE continued to provide the public with timely access to these disclosures on its [website](#). In fiscal year 2023, OGE increased transparency by implementing a new practice of listing all financial disclosure reports available to request after 30 days on its website, regardless of certification status. OGE also continued its practice to provide each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act.

**Performance Goal:** OGE exceeded its target to close ninety percent (90%) of its reviews of public financial disclosure reports, including new entrant, annual, termination, and periodic transaction reports, required to be submitted to OGE within 60 days of receipt by the agency. Target: 90% | Actual: 98%



*Analyzed, responded to requests for, and made publicly available Certificates of Divestiture (CDs) issued by OGE*

*FINANCIAL DISCLOSURE REVIEW*

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain employees may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. In fiscal year 2023, OGE issued 196 CDs and timely published



information about each CD it issued to the [Officials' Individual Disclosures Search Collection](#) on its website.

*Consulted with agencies on waivers for their employees to the primary criminal conflict of interest law, 18 U.S.C. § 208*

The primary criminal conflict of interest law, 18 U.S.C. § 208, prohibits employees from participating in certain government matters affecting their own financial interests or the interests of certain persons with whom they have ties outside the government. In some cases, a waiver to these restrictions may be appropriate if the financial interest is “not so substantial as to be deemed likely to affect the integrity of the services which the government may expect from such officer or employee.” In fiscal year 2023, OGE consulted with agencies on approximately 60 waivers, prior to their issuance, and collected copies of final waivers. OGE also conducted an analysis to determine if and how OGE could make information about which employees receive such waivers more transparent. (See page 22 for more information.)

### **Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks**

Although limited by statute,<sup>2</sup> OGE continued to use its authorities and oversight role to address known or potential ethics risks.

*Made inquiries and potentially intervened if an agency ethics program appeared to OGE to be out of compliance with ethics requirements*

OGE continued to conduct real-time inquiries and reviews in response to data or external sources that suggest that an agency ethics program is out of compliance. In fiscal year 2023, OGE conducted approximately eight inquiries.



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<sup>2</sup> The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rests with the management of the employing agency, the relevant inspector general’s office, or in the case of alleged crimes, the Justice Department. *See* 5 U.S.C. app. § 402. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an appointee’s compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE’s only recourse would be to notify the President. *See* 5 U.S.C. § 13122(f)(2)(A).

*Made inquiries and potentially held the employing agency accountable for action when one of its employees appeared to OGE to be out of compliance with ethics requirements*

Although OGE’s primary mission is prevention, when OGE is made aware that an employee appears to be out of compliance with ethics requirements, OGE may take one of the following steps: make inquiries to the employee’s agency ethics officials; determine whether the agency is taking sufficient remedial actions; recommend that the agency investigate or take corrective or disciplinary action; and determine whether further investigation is required. If further investigation is required, OGE may recommend that the agency refer the matter to the agency’s Inspector General. After an investigation by the agency and/or an Inspector General, OGE will consider whether any further action is required. If OGE determines the noncompliance was the result of a systemic problem with the management of the agency ethics program, OGE may evaluate the program through an unscheduled program review.

In rare cases, OGE may directly refer a case to the Inspector General for investigation when OGE is in the best position to know the facts, such as when directly involved in reviewing a nominee’s or employee’s public financial disclosure report. OGE can also use its authority to decline to certify a public financial disclosure report that comes to OGE for review. While OGE can make referrals and decline to certify reports, OGE is statutorily prohibited from making determinations that a past action constitutes a violation of a criminal ethics law.

In fiscal year 2023, OGE made eight inquiries to an employee’s agency ethics officials; determined three times whether the agency was taking sufficient remedial actions; recommended zero times that the agency investigate or take corrective or disciplinary action; and determined zero times whether further investigation is required.

*Used transparency to hold agency leaders and ethics programs accountable*

OGE uses transparency to hold agency leaders and ethics programs accountable. In fiscal year 2023, OGE published more than 13,400 individual ethics documents and agency ethics program documents. This included oversight correspondence, program review reports, Annual Questionnaire responses, 1353 travel reports, as well as public financial disclosures, ethics agreements, related compliance documents, Pledge Waivers, and Certificates of Divestiture. Without this transparency, the public could not as meaningfully oversee the integrity of its government. See page 28 for more information.



### Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership

OGE has a vital role in supporting the President’s constitutional duty to nominate and appoint officers to the executive branch. OGE helps top executive branch officials resolve conflicts and demonstrate ethical leadership to create an ethical culture in their agencies.

To achieve its strategic goal of helping top executive branch officials resolve conflicts of interest and demonstrate ethical leadership, OGE has developed three strategic objectives: (3.1) Carry out OGE’s statutory role in preparing for and supporting Presidential transitions; (3.2) Assist the President and the Senate in the Presidential appointments process; and (3.3) Foster ethical leadership in senior officials.

#### Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions

In fiscal year 2023, OGE carried out its statutory role in preparing for and supporting Presidential transitions. Key highlights of OGE’s work are described below.

##### *Served on the Agency Transition Directors Council*

Throughout fiscal year 2023, OGE actively participated as a member of the executive branch-wide Agency Transition Directors Council and collaborated with the Partnership for Public Service’s Center for Presidential Transition.

##### *Developed comprehensive training plans*

To be able to effectively carry out its unique role in the Presidential transition, in fiscal year 2023 OGE developed and began to implement comprehensive training plans for both ethics officials and OGE staff, including building internal capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition. This plan was developed using feedback collected from ethics officials, as well as an internal analysis of OGE’s 2020 staffing plan.



**Milestone:** OGE met its milestone to complete an OGE staffing plan and develop a training plan for OGE staff and ethics officials.

*Review disclosures and provide ethics support to Presidential candidates*



OGE is responsible for reviewing the financial disclosure reports of individuals who declare their candidacy for the Office of the President of the United States. In fiscal year 2023, OGE reviewed 28 of these public financial disclosure reports for technical completeness and posted these reports to OGE’s website. To assist these individuals, OGE created a new webpage with resources for candidates, such as an overview of the process and guides for completing a financial disclosure report.

### **Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process**

In fiscal year 2023, OGE continued to thoroughly review the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed (PAS) nominees. OGE reviewers worked with officials at various federal agencies and the White House to resolve potential conflicts of interest through written ethics agreements. Key highlights of OGE’s work are described below.

*Conducted expert second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions*

In fiscal year 2023, OGE continued to work with agency ethics officials to identify and resolve any conflicts of interest that incoming PAS leaders may have. OGE identifies and resolves potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations.

OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process.

In fiscal year 2023, OGE worked with agencies and filers to identify and resolve potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. In addition, OGE worked with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act. Lastly, OGE timely transmitted each review package, consisting of the financial disclosure report and ethics agreement, directly to the Senate following a Presidential nomination.

Notably, the volume of reports reviewed remained high. OGE reviewed 266 reports, which represent approximately twenty-four percent (24%) of all PAS positions. Further, OGE cleared ninety-two percent (92%) of the nominee reports it received in fiscal year 2023.

**Performance Goals:** OGE exceeded its target to provide, within established time frames, initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments to agencies within established time frames. Target: 90% | Actual: 93%. OGE exceeded its target to certify final financial disclosure reports of Presidential nominees for Senate-confirmed appointments within seven calendar days of receipt from the agency. Target: 90% | Actual: 99%

Nominee reports range from three pages to hundreds of pages in length.

Over the years, new, more complex financial instruments have been created.

This ongoing innovation and proliferation of very complex financial instruments poses a challenge for the agency.

OGE needs to research and understand each new asset.

Staff then must determine the financial disclosure reporting requirements for these new financial instruments, analyze the potential conflicts of interest issues, and determine if any exemption would apply to the asset.

Developing remedies for potential conflicts related to more sophisticated products creates additional challenges.

### Strategic Objective 3.3: Foster ethical leadership in senior officials

In fiscal year 2023, OGE continued to seek opportunities to engage senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities. Key highlights of OGE's work are described below.

*Maintained regulatory standards and communicated with officials about them*

Each agency head is responsible for, and must exercise personal leadership in, establishing and maintaining an effective agency ethics program and fostering an ethical culture in the agency. To that end, OGE maintains specific regulatory ethics standards for senior leaders and managers.

In fiscal year 2023, OGE continued its practice of engaging with senior leadership by delivering written welcome letters on the importance of ethical leadership to all PAS officials and sending correspondence in connection with program review reports and the financial disclosure annual season. In fiscal year 2023, OGE sent 278 year-end letters to agencies regarding compliance with financial disclosure responsibilities under the Ethics in Government Act, 126 welcome letters to new PAS officials, 139 letters to agency heads in connection with program review reports, and published [14 Leadership Notes](#).

OGE also continued to provide briefings to new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public's trust. In fiscal year 2023, OGE delivered three of these briefings to approximately 250 individuals. Through these engagement opportunities, OGE and agencies convey the importance of, and techniques for, leading ethical organizations.

#### **Performance Indicators:**

- 5 - # of communications to senior officials (welcome letters, year-end letters, program review reports, Leadership Notes, SES Training)
- 874 - # of senior officials who received a communication

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OGE asks senior executive branch officials to demonstrate ethical leadership by:

- Meeting their individual ethics commitments
- Using their leadership platform to promote ethics in government
- Creating and supporting a strong ethics program in their agencies

## Strategic Goal 4: Use Transparency to Further the Oversight of the Executive Branch

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility by making ethics documents publicly available and raising the American public's awareness about the systems in place to prevent conflicts of interest and mechanisms available to hold their government accountable. Without this transparency, the public could not meaningfully oversee the integrity of its government.

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

To achieve its strategic goal of using transparency to further oversight of the executive branch, OGE has developed two strategic objectives: (4.1) Make ethics information publicly available; and (4.2) Reach a broader array of stakeholders.

### Strategic Objective 4.1: Make ethics information publicly available

In fiscal year 2023, OGE continued to make ethics documents publicly available. Key highlights of OGE's work are described below.

*Provided timely access to ethics information and made ethics information easy to locate and understand*

In fiscal year 2023, OGE continued to timely post a wide variety of ethics documents on its website to ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making. OGE makes publicly available key information about nearly all of its activities as the supervising ethics office of the executive branch. Available documents include thousands of pages of agency program review reports, policy guidance, information about each agency's ethics program, documentation of senior leaders' compliance with ethics commitments, and financial disclosure reports of high-level officials.

In fiscal year 2023, OGE significantly increased transparency with regard to the public financial disclosure reports it reviews as a result of an ongoing effort to evaluate making additional data sets available to the public. OGE now lists on its website all financial disclosure reports available to request after 30 days, regardless of certification status. Previously, OGE listed reports as available to request on OGE's website only after closing the report by either certifying or declining to certify. Notably, in fiscal year 2023, OGE processed 5,927 requests from the public and the news media to inspect 13,401 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, and other covered records.

In addition, OGE worked in fiscal year 2023 to make the ethics information it provides easier to locate and understand. For example, OGE simplified the instructions for submitting a request for ethics documents. OGE also held a call with the press to improve the accuracy of reporting, and provided a point of contact at each agency on [OGE's ethics contact page](#) for submitting document requests.

OGE also worked to address the potential inequitable awareness of, and access to, ethics records by underserved communities. In fiscal year 2022, OGE analyzed its communications and, in fiscal year 2023, incorporated more [plain language](#) into those communications to remove barriers to access and understanding.

Notably, OGE also removed a significant language barrier by translating its request form for ethics documents and its public financial disclosure form into Spanish and Chinese.



**Performance Indicator:**

13,401 ethics documents requested

**Milestone:** OGE met its milestone to make an additional dataset available on its website.

*Maintained a responsive Freedom of Information Act program*

The Freedom of Information Act (FOIA) is critical in helping to ensure transparency in government by providing the public with access to important documents. OGE demonstrates its commitment to a responsive FOIA program by maintaining an effective system for responding to FOIA requests. This approach includes increasing proactive disclosures, improving timeliness in responding to requests, and applying a presumption of openness in responding to requests. OGE also uses technology to more effectively communicate with requestors, track requests and manage FOIA program records. Notably, in fiscal year 2023, OGE proactively posted more than 698 pages of responsive records on its website.

OGE also continued to conduct regular self-assessments of its FOIA processing procedures and response templates and, when appropriate, to make changes to increase efficiency, improve search processes, increase transparency, and otherwise improve the operation of OGE's FOIA program. In fiscal year 2023, OGE received 112 FOIA requests and responded to 113 requests. Notably, OGE improved its processing time for perfected simple requests by 25% and for perfected expedited requests by 76% over the prior fiscal year.



## Strategic Objective 4.2: Reach a broader array of stakeholders

In fiscal year 2023, OGE proactively engaged stakeholders on critical ethics issues. OGE provided relevant, understandable information through effective communication channels, such as its website; collaborated with a broad array of stakeholders; and timely responded to requests for information and assistance. Key highlights of OGE's work are described below.

### *Conducted proactive stakeholder engagement*

In fiscal year 2023, OGE proactively engaged with a variety of stakeholders, including ethics officials, NGOs, advocacy groups, and private citizens. Notably, OGE frequently engaged with the public as part of its regulatory review and Paperwork Reduction Act process. This included inviting feedback from stakeholders related to the legal expense fund regulation, several OGE forms, including the public financial disclosure form, and a proposed regulation on modernization updates to the Standards of Ethical Conduct for Employees of the Executive Branch. OGE met with 40 individuals and received 50 comments in connection with its rulemaking and forms renewal process.

### *Created communications that are accurate, compelling, relevant, and tailored to each target audience*

In order to enhance public confidence in the impartiality of government decision-making, OGE worked to communicate effectively about the ethics program by creating communications that were accurate, compelling, relevant, tailored to each targeted audience, and delivered through effective communication channels. For example, using social media, including X/Twitter, YouTube, and LinkedIn, OGE created 250 posts in fiscal year 2023 to help the public understand the structure of the ethics program, learn how to access various ethics documents, and contribute to government accountability. To better assist the press, OGE also updated its frequently asked press questions.

In fiscal year 2023, OGE published 14 Leadership Notes to reach federal employees and the public, highlighting important issues to the community, such as [new strategic objectives](#) in OGE's Strategic Plan, [OGE's new regulation related to legal expense funds](#), [transparency](#), and more. These notes were regularly highlighted in media that reaches federal employees.

**Performance Indicators:** An indicator of OGE's success in expanding its outreach efforts is the number of page views of web pages targeted to the public on OGE's website (1,394,584), as well as OGE's X/Twitter engagement rate (1.72%).

*Responded timely to external requests for information and assistance*

OGE responded to a large volume of requests for information and assistance from its external stakeholders on topics such as conflicts of interest, enforcement, public financial disclosure, gifts from outside sources, and post-employment.

In fiscal year 2023, OGE responded to approximately 80 requests for assistance from the press to support more accurate reporting about the ethics laws and regulations and OGE's work. These interactions multiplied OGE's ability to reach the public to promote further 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 more than 390 requests from private citizens. This engagement promoted understanding of the executive branch ethics program and related ethics laws and regulations.

**Performance Indicator:** An indicator of OGE's success in expanding its outreach efforts is the number of requests from external stakeholders. In fiscal year 2023, OGE received approximately 400 requests from non-governmental, external stakeholders. This coverage helped the public understand the framework for government ethics in the executive branch.

*Participated and collaborated with ethics practitioners across various segments of society*

OGE continues to participate as a member of private sector state and local ethics organizations, such as [COGEL](#), in addition to federal interagency groups, such as the Small Agency Council. Through meetings, presentations, and online forums, OGE continues to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. OGE also conducts outreach and participates with organizations that share common interests related to OGE's mission, such as the [Partnership for Public Service](#).



**Performance Indicator:** An indicator of OGE's success is expanding its outreach/feedback activities conducted during the fiscal year. OGE conducted 24 outreach/feedback activities during the fiscal year.

## Crosscutting Objective

### Crosscutting Objective 5.1: Advance equity in OGE's programs and improve diversity, equity, inclusion, and accessibility in OGE's operations.

#### *Advanced equity in OGE's programs*

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

OGE has published its [Equity Action Plan](#) and determined that it can most effectively advance equity and remove barriers for underserved communities in three key program areas: (1) ethics education (see page 11), (2) release of ethics records (see page 28), and (3) procurement (see page 37). As described throughout this document, OGE plans to undertake, or has already implemented, a variety of actions to further equity among federal employees, the general public, members of the greater executive branch ethics community, and disadvantaged businesses.

**Milestone:** OGE met its milestone to make progress on a majority of items in its Equity Action Plan.

#### *Improve diversity, equity, inclusion, and accessibility (DEIA) in OGE's operations*

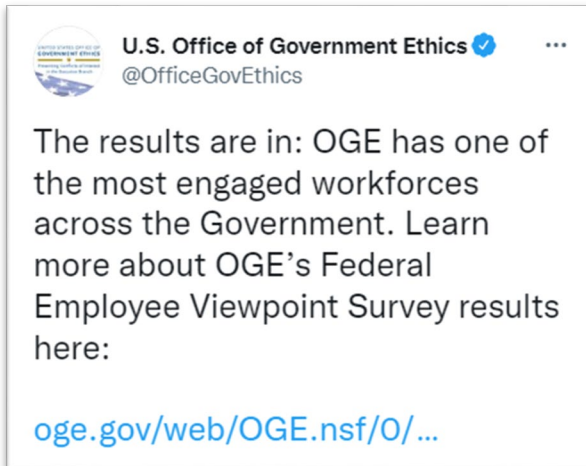
In fiscal year 2023, OGE continued to implement its DEIA Strategic Plan, reflecting its whole-of-agency approach to advancing DEIA. Developed by a cross-divisional team of employees at a variety of levels, OGE began its efforts to increase leadership engagement, improve its hiring practices, review its professional development programs, and improve workplace accessibility and safety. As part of this effort, OGE implemented new practices for all hiring actions, such as redacting the names of applicants, and provided anti-harassment training and training on reasonable accommodation to all OGE employees. OGE also surveyed staff about OGE's DEIA efforts, updated its anti-harassment policy to include a section on civility, and issued a new policy on religious accommodation. Lastly, OGE also made significant progress on its government-wide DEIA initiative related to improving access to professional development for ethics officials. See page 11 for more information.



**Milestone:** OGE met its milestone to make progress on a majority of items in its DEIA Strategic Plan.

## Fiscal Year 2023 Stewardship

To effectively lead in ethics, OGE must be an excellent steward of the resources entrusted to it to carry out its critical mission of preventing conflicts of interests in the executive branch. OGE endeavors to be a model agency with regard to its workforce, technology, and compliance. Specifically, OGE invests in the development, diversity, and



retention of its most valuable asset: its staff, who work tirelessly to accomplish the agency's vital mission. OGE leverages technology to amplify its impact by increasing the reach of its limited resources. OGE also strives to maximize every taxpayer dollar provided to the agency and to remain compliant with the wide array of requirements applicable to federal agencies.

In support of its mission and strategic goals, OGE has developed three stewardship objectives: (6.1) Sustain a high-performing, cross-functional staff;

(6.2) Leverage technology to increase efficiency and effectiveness; and (6.3) Safeguard the government resources entrusted to OGE.

### Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. OGE's continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities.

Accountability and Performance: In fiscal year 2023, OGE continued to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; reviewing the Employee Viewpoint Survey results; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

**Employee Recognition:** In fiscal year 2023, OGE continued to recognize employees through its awards program, which includes spot awards and year-end performance bonuses. OGE surveyed its staff to identify recognition preferences and to solicit new ideas. OGE also took a wide variety of additional steps to create an inclusive work environment. For example, OGE held regular special emphasis program meetings in fiscal year 2023, which were open to OGE’s entire staff and included numerous speakers from federal and local communities.



**Hiring:** OGE hired and onboarded six employees, including two paid interns. In direct support of its DEIA Strategic Plan, prior to these recruitment efforts, OGE reviewed its hiring practices and updated its procedures against evidenced-based best practices to identify and then implement improvements, such as redacting the names of all applicants and providing anti-bias training for interview panelists. Notably, OGE was able to leverage workplace flexibilities, such as remote work, to draw on a wider candidate pool, resulting in hiring individuals with prior ethics experience from across the nation.

**Workforce Development:** OGE continually focuses on developing the knowledge, skills, and abilities of its employees through personalized formal and informal professional development opportunities. In fiscal year 2023, all OGE employees participated in the OGE Employee Development Plan (EDP) program. Through the EDP process, employees, in collaboration with their supervisors, identify specific formal training, mentoring, self-study, and/or on-the-job training activities that they will complete in the covered period. Employees have the opportunity to lead significant projects, as well as participate in cross-functional teams and training. Notably, the EDP identifies objective measures for assessing the employee’s acquisition of the targeted knowledge or skills. Lastly, as part of its DEIA initiative, OGE examined its EDP program as part of its commitment to create more uniformity and better serve employees who are members of underserved communities. OGE implemented changes to the EDP program as part of the current performance appraisal cycle.

**Performance Goal:** OGE exceeded its target for its employee engagement index score on the Employee Viewpoint Survey. Target: 80% | Actual: 90%

## Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness

OGE leverages technology to increase its efficiency and effectiveness in all aspects of its work. Without strong, secure information systems and processes, the agency cannot carry out its executive branchwide mandates, operate effectively, or efficiently perform its mission-critical activities.

### *Maintained and refined OGE's website*

OGE's website is the agency's main communication tool and the most valuable resource for OGE's stakeholders, including agency ethics officials, the media, and the general public. OGE continued to maintain and refine its website in conformance with the 21st Century Integrated Digital Experience Act. For example, OGE made significant user experience improvements to its Public Financial Disclosure Guide, one of its most popular resources. In addition, in fiscal year 2023, OGE significantly improved the loading time of the [Individual Disclosures Search Collection](#) from 3 minutes to 2 seconds.



### *Implemented a comprehensive IT replacement*

In fiscal year 2022, OGE reached the end of the four-year life-cycle for its IT infrastructure and associated equipment. At its urgent request, OGE received appropriations in fiscal year 2023 to replace outdated IT equipment. OGE timely procured all new equipment and peripherals to support a hybrid work environment. This includes softphones and individual virtual meeting accounts for each employee. Softphones allow employees to make and receive phone calls on an OGE-owned phone number over the internet without needing a physical telephone, and individual virtual meeting accounts increase productivity by making it easier for employees to collaborate, stay informed, organized, and connected.

Notably, in fiscal year 2023, OGE began migrating its network to a secure, FedRAMP-certified government cloud environment which will simplify compliance with National Institute of Standards and Technology guidelines, simplify network disaster recovery, allow OGE to shrink its physical office space, and provide network access independent of conditions at OGE's physical work location. Moving to the cloud will also eliminate the need to buy new network hardware and software every four years (the network refresh cycle).

**Milestone:** OGE met its milestone of migrating the OGE network to a cloud environment.

OGE has developed numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal year 2023, OGE continued to devote resources to applications that support major mission programs, such as the Desk Officer program, the Annual Questionnaire, the Records Program, and financial disclosure tracking, as well as those applications that support internal operations, such as requisition processing, budget formulation, and equipment tracking. These custom applications allow OGE to accomplish its mission with limited staff and help the agency to make data-driven decisions.

### Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE

In addition to its mission work, OGE conducts its agency operations following the principle that “public service is a public trust.” OGE takes seriously its compliance with government-wide directives and their important policy objectives, including carefully safeguarding the government resources entrusted to OGE.

Fiscal stewardship: OGE continued to be an excellent fiscal steward of the resources entrusted to it. OGE demonstrated its commitment to effectively and efficiently manage funds appropriated by Congress to execute OGE mission goals, including maximizing its use of 27 shared services and interagency agreements. Not only does OGE continually seek full value from each taxpayer dollar, it does so while implementing strong fiscal controls. Notably, in fiscal year 2023, OGE maintained an unmodified opinion on its financial statements and an independent financial audit found no material internal control weaknesses. As part of this process, OGE conducted the annual internal controls survey.



To reduce fiscal risk and ensure that OGE remains fiscally responsible, OGE continued to use a custom internal application, which builds in additional internal controls and tracking, to maintain its effective process for approving requisitions. OGE also continued to maintain strong internal controls regarding its inventory of IT equipment and other assets. Lastly, OGE updated its enterprise risk management registry to identify additional internal controls that need to be implemented across all program areas.

In addition, to use OGE’s purchasing power to increase equity among the historically underserved, OGE has refined its procurement practices, procedures, and tracking to ensure a significant percentage of its purchases (99% of contracts awarded and 33% of micro purchases) are made from disadvantaged businesses. This is 76 percentage points higher for contracts and 18 percentage points higher for micro-purchases than the Administration’s goals of 23 and 15, respectively, for this year.

Relocation of OGE office: Notably, in fiscal year 2023, OGE worked with GSA to sign a new lease in advance of the expiration of its current lease in February 2024. To the benefit of the agency and overall government, OGE backfilled vacant space under another federal agency’s existing lease. OGE also preserved resources by significantly shrinking its office



space requirements by 17,000 square feet/70% of its current space, resulting in \$1,096,000 cost savings. As part of its preparation to relocate and reduce its space, OGE also digitized its remaining paper records (bringing OGE into advanced compliance with NARA records directives), cleaned out unnecessary materials, and excessed unneeded furniture and equipment.

**Performance Goal:** OGE met its performance goal of receiving an unqualified opinion on its annual financial report from an independent auditor.

**Cybersecurity:** In accordance with the Federal Information Security Modernization Act (FISMA), OGE’s security program continued to review weekly network perimeter scans performed by the Department of Homeland Security; procure and undergo annual security assessment reviews conducted by accredited independent auditors using FISMA CIO and FISMA IG metrics; provide mandatory annual cybersecurity awareness training (general and role-based); and prepare for *INTEGRITY’s* annual security assessment. OGE participates in the Continuous Diagnostics & Mitigation (CDM) Program, which provides capabilities and tools to identify cybersecurity risks on an ongoing basis, prioritizes risks based on potential impacts, and enables cybersecurity personnel to mitigate the most significant problems first. In fiscal year 2023, OGE also took steps to comply with Executive Order 14028 on Improving the Nation’s Cybersecurity and subsequent guidance (e.g., OMB Memos M-21-30, M-21-31, M-22-01, M-22-05, M-22-09, etc.). This work is critical to protect the confidentiality, integrity, and availability of OGE’s information and information systems against unauthorized access and use.

**Performance Goal:** OGE met its performance goal of “managing risk” for the majority of categories on the Cybersecurity Risk Management Assessment.

**Compliance:** OGE continued to strive to remain compliant with the wide array of requirements applicable to federal agencies. Key highlights of OGE’s work are described below.

**Data:** OGE continued to ensure the agency’s compliance with the Foundations for Evidence-Based Policymaking Act, to convene monthly meetings of its Data Governance Board, and to actively participate in the Chief Data Officers Council. In fiscal year 2023, OGE expanded its data activities by building data governance for key applications, holding lunch and learn sessions on topics such as data visualization and data validity, and prioritizing the use of data in its decision-making.



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Last week, OGE’s Chief Data Officer presented at the @Nextgov Data Innovation Workshop about how OGE uses data to inform internal decision making, hold the executive branch ethics program accountable, and build public trust.

*Privacy:* In fiscal year 2023, OGE continued to safeguard privacy by maintaining critical executive branchwide systems of records related to the ethics program, including *INTEGRITY*, as well as the agency's internal records. OGE's Privacy Program Team worked to ensure that the agency complies with the requirements of the Privacy Act, the E-Government Act, and the executive branch privacy program requirements, as established by OMB. During fiscal year 2023, the Privacy Team reviewed 30 Privacy Threshold Analyses, drafted or revised four System of Records Notices (SORNs), including a new government-wide SORN, OGE GOVT-3, to support the legal expense fund program, and drafted or revised three new Privacy Impact Analyses. The team also conducted privacy training and role-based privacy training to those required to receive it, including agency employees and supervisors, and government contractors who perform services for the agency.

*Records:* OGE continued to enhance its Records Management Program in order to ensure agency records are available to the public and OGE staff, and to comply with records management requirements. In fiscal year 2023, this work included: developing and updating records management policies and procedures; developing and conducting training; onboarding new employees; working with the National Archives and Records Administration (NARA) on OGE mission-specific disposition authorities; issuing records management guidance; conducting inventories of agency records systems and repositories; and updating records file plans. Notably, OGE timely submitted three program assessments to NARA and received high scores on each report. As a result of these reviews, NARA assessed OGE's records program in the "low risk category."

**Performance Goal:** OGE met its goal for the number of employees that completed required training (i.e., records management, cybersecurity, privacy, and ethics training). Target: 90% | Actual: 97%