

CY17 Annual Agency Ethics Program Questionnaire



A Snapshot of the Executive Branch Ethics Program

U.S. Office of Government Ethics

06/05/2018

(Revised 8/29/18, See Addendum)



Section 1 – Introduction

This report summarizes data compiled from responses to the Annual Agency Ethics Program Questionnaire (“Annual Questionnaire” or “questionnaire”) for calendar year 2017. Responses were submitted by each executive branch agency to the U.S. Office of Government Ethics (OGE) in early 2018. This report provides a snapshot of the executive branch ethics program.

The first section gives a brief overview of OGE’s legal authority to require agencies to respond, OGE’s survey methodology, and the limitations of the data collected. The second section provides highlights from the summary data. The third section contains the aggregate responses to each question as submitted by agencies. Finally, the Appendix contains 54 tables of additional comments individual agencies submitted in response to the questionnaire.

Legal Requirement

Pursuant to section 402(e)(1) of the Ethics in Government Act of 1978, as amended, executive branch agencies are required to submit an annual report to OGE. Pursuant to 5 C.F.R. § 2638.207, the report is due to OGE on or before February 1 of each year and covers the previous calendar year. OGE collects the required information through its Annual Agency Ethics Program Questionnaire. Ethics officials are asked to provide information on the following topics:

- Organizational Structure
- Ethics Program Administration
- Education and Training
- Advice and Counseling
- Financial Disclosure (Public and Confidential)
- Enforcement
- Ethics Pledge (contained in Executive Order 13770)
- Advisory Committees/Special Government Employees

Methodology

To facilitate timely responses, each agency received an advance courtesy copy of the questionnaire in May 2017 and an updated copy in November 2017. OGE opened the survey in early January 2017. OGE used a proprietary application to collect each agency response. OGE Desk Officers followed up with individual agencies for additional information or clarification based on a select set of criteria. This summary report reflects the compilation of agency responses.

Response Rate

100% (136 agencies)

Data Limitations

When reviewing this report, it is important to keep the following data limitations in mind:

- While OGE reviews certain agency responses for anomalies and follows up as necessary, OGE does not independently verify the submitted information.
- Questions are open to differing interpretations by agencies, which may result in data variation.
- This report does not include classified information. Therefore, the aggregate number for certain questions¹ may be higher than reported.

¹ Questions: 2, 24, 25, 26, 27, 34, 44, 46, 48, 49, 50, 59 e-l, 61, 62, 92, 94.



Section 2 – Executive Summary

The Executive Summary highlights key data points from the complete summary data contained in Section 3. The data reflects agency responses for calendar year 2017.

Ethics Officials

The Designated Agency Ethics Official (DAEO) is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. The results of this year's questionnaire show that the majority of DAEOs are career employees (90%) who serve in a senior executive position (61%). While the majority of DAEOs have spent less than 5 years in their current position (62%), DAEOs have on average 11 years of ethics experience (Q.3).

In total, agencies reported that 7,496 individuals supported the ethics program in 2017, with over 5,000 working outside the DC metro area (Q.5). Most ethics officials perform ethics duties as one of many responsibilities, with only 11% working on ethics nearly full-time (Q.5).

Financial Disclosure

The financial disclosure system prevents conflicts of interest through a systematic review of the financial interests of both current and prospective employees.

The 2017 annual questionnaire results demonstrate a high rate of compliance with the filing requirements:

- The compliance rate for filing public financial disclosures was 99%: 28,616 public financial disclosure reports (nominee/new entrant, annual, termination, and combination) were required to be filed, and 28,352 reports were filed (Q.46 and Q.94).
- The compliance rate for filing confidential financial disclosures was also 99%: 386,301 confidential disclosure reports were required to be filed, and 382,874 were filed (Q.61 and Q.94).

In addition to new entrant and annual reports, public filers must also report transactions of certain securities as they occur, so that ethics officials can evaluate potential conflicts of interest in close to real-time. In 2017, 13,755 periodic transaction reports were filed (Q.49).

The primary purpose of financial disclosure is to identify and remedy potential conflicts of interest. Agencies reported that recusal was the most common remedial action taken in response to information regarding a conflict of interest reported on a new entrant, annual, periodic transaction, or termination public financial disclosure report (Q.65).

Training

All employees are required to receive initial ethics training. Certain employees are also required to receive ethics training annually. The training teaches employees how to identify ethics issues and how to obtain assistance in resolving those issues.

Overall, the results from the questionnaire demonstrate a high rate of compliance with the training requirements:

- 95% (522) of new Senate-confirmed Presidential appointees received their initial ethics briefing within the 15-day requirement (Q.32)
- 91% of new employees received initial ethics training within the 3-month requirement (Q.24)
- 96% of public and confidential financial disclosure filers received required annual ethics training (Q.34)
- 91% of special Government employees serving on a board, commission, or committee received initial ethics training before or at the first meeting (Q.92)

Advice and Counsel

Agency ethics officials advise prospective, current, and former employees regarding the ethics laws and rules. This counseling helps ensure that employees receive relevant and timely guidance when faced with real-life ethics issues. Employees most frequently sought guidance on: (1) gift acceptance and (2) financial disclosure reporting (Q.42).

While not required, the majority of agencies (118) memorialize all or some of the advice they provide to employees. To further ensure consistency of advice, agencies reported implementing the following practices: using advice and counsel templates (75); having supervisors periodically review advice given to employees (72); and leading guided discussion among staff (88)(Q.43).

Ethics Pledge

Executive Order 13770 requires certain individuals appointed to an executive branch agency on or after January 20, 2017, to sign an Ethics Pledge (“Pledge”).² By signing the Pledge, appointees commit to additional recusal obligations, post-employment restrictions, and a ban on accepting gifts from lobbyists or lobbying organizations.

² The following advisories, located on OGE’s website, provide detailed guidance regarding the appointees subject to the Ethics Pledge: LA-17-03, DO-09-003, DO-09-005, DO-09-010, and DO-09-020.

Overall, there was a high rate of compliance (99%) with signing the Pledge. Of the 2,599 distinct individuals appointed,³ 2,584 were required to sign the Pledge.⁴ Of those, 2,559 signed and 25 did not. For the 25 that did not sign, agencies provided the following reasons (Q.79):

- 19 appointees left their agency before signing the Pledge
- 2 appointees moved into non-Pledge positions
- 4 have not signed the Pledge

Pledge signers who were registered lobbyists during the two years prior to their appointment are required to recuse from certain activities related to their prior lobbying activities. Agencies reported that 3% (80) of the full-time, non-career appointees were registered lobbyists during the two years prior to their appointment (Q.80).

The Executive Order provides a mechanism for the President or his designee to waive any of the restrictions contained in the Pledge. The White House granted waivers to at least 37 individuals across 12 agencies.⁵ Paragraph 6, which requires appointees to recuse for two years from certain matters related to former employers or clients, was waived 25 times, making it the most frequently waived Pledge provision (Q.81).

Agencies reported no violations of the Ethics Pledge or corresponding enforcement actions (Q.82).

Enforcement

While OGE takes actions to ensure agency compliance with ethics program requirements, each agency is responsible for investigating and taking action against an employee who violates an ethics rule or law. Agencies may take corrective or disciplinary action under applicable Government-wide regulations or agency procedures. If misconduct is potentially criminal in nature, the agency must refer the matter to the Department of Justice.

³ OGE determined that 2,599 distinct individuals were required to sign the Pledge by subtracting from 2,626 (Q.78) the 27 individuals who were Pledge appointees at more than one agency during 2017 (23 who signed at their original agency and were not required to sign again at their new agency (line b. in Q.79) and 4 who did not sign at their original agency but did sign at their new agency (included in line c. of Q.79)). Once an individual signs the Pledge, that person is not required to sign it again upon appointment to a Pledge position at another agency, if there is no break in service.

⁴ OGE determined that 2,584 individuals were required to sign the Pledge by subtracting from 2,599 the 15 individuals who were not required to sign the Pledge (13 individuals who occupied exempt non-policymaking positions (line a. in Q.79) and 2 Inspectors General who were appointed in 2017, but prior to January 20, 2017 (included in line c. of Q.79)).

⁵ The White House granted Paragraph 6 waivers to an unspecified number of Executive Office of the President appointees relating to news organizations, White House Office Commissioned officers relating to covered political organizations, and former Jones Day employees in certain circumstances.

Agencies reported that 1,235 disciplinary actions were taken based on violations of the Standards of Conduct (Q.72) and 69 referrals were made to the Department of Justice of potential violations of the criminal conflict of interest statutes (Q.74).



Section 3 – Compilation of Agency Responses

The information in this section represents a summary of the responses provided by the 136 reporting agencies. For each response, the **bold, red** number indicates the total number of agencies who provided that response. Percentages were rounded to the nearest whole number, except when the rounding would have resulted in a 100%.

PART 4. ORGANIZATION/RESOURCES

Highlights

- 6% of DAEO positions and 8% of the ADAEO positions were vacant at the end of calendar year 2017. (Q.3-4)
 - A large majority of DAEOs (90%) and ADAEOs (95%) were career employees. (Q.3-4)
 - Approximately 7,496 individuals supported the ethics program. Of these, approximately 11% performed 31 or more hours of ethics duties per week. (Q.5)
-

1. Agency: **136 (100% response rate)**
2. Number of full-time agency employees as of December 31, 2017: **3,781,088**

3. Information about the Designated Agency Ethics Official (DAEO)⁶:

	DAEO
a. Vacant (as of December 31, 2017)	<input type="checkbox"/> Yes (<i>skip to 3b and then 4</i>) 8 (6%) <input type="checkbox"/> No (<i>go to #3c</i>) 128 (94%)
b. When did the position become vacant?	Month/Year (<i>skip to #4</i>)
c. Name	
d. Title	
e. Time in current DAEO position	<input type="checkbox"/> Less than 1 year 20 (16%) <input type="checkbox"/> 1 - 4 years 59 (46%) <input type="checkbox"/> 5 - 9 years 25 (20%) <input type="checkbox"/> 10 or more years 24 (19%)
f. Total years performing ethics duties	<input type="checkbox"/> 1 - 4 years 45 (35%) <input type="checkbox"/> 5 - 9 years 26 (20%) <input type="checkbox"/> 10 or more years 57 (45%)
g. Grade level	<input type="checkbox"/> Executive Schedule 10 (8%) <input type="checkbox"/> SES or equivalent 78 (61%) <input type="checkbox"/> GS 15 34 (27%) <input type="checkbox"/> GS 14 and below 6 (5%)
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 94 (73%) <input type="checkbox"/> 26-50% 18 (14%) <input type="checkbox"/> 51-75% 4 (3%) <input type="checkbox"/> 76-100% 12 (9%)
i. Was the DAEO eligible to retire as of December 31, 2017?	<input type="checkbox"/> Yes 40 (31%) <input type="checkbox"/> No 88 (69%)
j. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> Career employee 115 (90%) <input type="checkbox"/> Political appointee 13 (10%)
k. Has OGE been provided a copy of the DAEO's designation letter? (response required only for DAEOs who have served less than 1 year in the current DAEO position)	<input type="checkbox"/> Yes 20 (100%) <input type="checkbox"/> No 0 (0%)

⁶ For the purposes of this aggregate summary, questions asking for responses that cannot be aggregated were omitted, as indicated by the strikethrough of the question text.

4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

	ADAEO
a. Position Vacant (as of December 31, 2017)	<input type="checkbox"/> Yes 11 (8%) <input type="checkbox"/> No (go to #4c) 125 (92%)
b. When did the position become vacant?	Month/Year (skip to #5)
c. Name	
d. Title	
e. Time in current ADAEO position (years)	<input type="checkbox"/> Less than 1 year 22 (18%) <input type="checkbox"/> 1 - 4 years 53 (42%) <input type="checkbox"/> 5 - 9 years 22 (18%) <input type="checkbox"/> 10 or more years 28 (22%)
f. Total years performing ethics duties	<input type="checkbox"/> 1 - 4 years 29 (23%) <input type="checkbox"/> 5 - 9 years 36 (29%) <input type="checkbox"/> 10 or more years 60 (48%)
g. Grade level	<input type="checkbox"/> Executive Schedule 3 (2%) <input type="checkbox"/> SES or equivalent 32 (26%) <input type="checkbox"/> GS 15 58 (46%) <input type="checkbox"/> GS 14 and below 32 (26%)
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 61 (49%) <input type="checkbox"/> 26 -50% 24 (19%) <input type="checkbox"/> 51-75% 12 (10%) <input type="checkbox"/> 76-100% 28 (22%)
i. Was the ADAEO eligible to retire as of December 31, 2017?	<input type="checkbox"/> Yes 35 (28%) <input type="checkbox"/> No 90 (72%)
j. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> Career employee 119 (95%) <input type="checkbox"/> Political appointee 6 (5%)
k. Has OGE been provided a copy of the ADAEO's designation letter? (response required only for DAEOs who have served less than 1 year in the current ADAEO position)	<input type="checkbox"/> Yes 22 (100%) <input type="checkbox"/> No 0

5. Number of employees who performed ethics program duties in 2017; e.g., financial disclosure, education and training, advice and counseling, program administration.

Duty Station	Approximate amount of time spent each week performing ethics duties					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
D.C. Metro area	571	841	246.5	137	537	2,332.5 (31%)
Outside the D.C. Metro area	1,461.5	2,426	742.5	248	285	5,163 (69%)
TOTAL	2,032.5 (27%)	3,267 (44%)	989 (13%)	385 (5%)	822 (11%)	7,495.5

*FTE = Full Time Equivalent

6. Does the DAEO/ADAEO have supervisory authority over the employees identified in question #5?

- Yes (skip to #8) **96 (71%)**
- No (go to #7) **25 (18%)**
- Not Applicable (skip to #8) **15 (11%)**

7. Indicate which elements of the ethics program have been delegated outside of the supervisory chain of the DAEO or ADAEO. Check all that apply.

- Assessment of program performance **6**
- Confidential financial disclosure program **12**
- Ethics advice and counseling **12**
- Ethics education and training **13**
- Public financial disclosure program **6**
- Other (specify) **12 Q7 Table**

8. Do contractors support the ethics program?

- Yes (go to #9) **32 (24%)**
- No (skip to #10) **104 (76%)**

9. Describe the extent of their support. **Q9 Table**
10. Identify the agency ethics officials who have ethics duties as a distinct element in their **performance standards**. Check all that apply.
- DAEO **107**
 - ADAEO **98**
 - All ethics officials (excluding DAEO/ADAEO) **40**
 - Some ethics officials (excluding DAEO/ADAEO) **34**
 - None **12**

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. **Part 4 Table**

PART 5. PROGRAM ADMINISTRATION

Highlights

- Agency ethics programs reported spending very significant time on advice and counseling (57 agencies ranked this as requiring a very significant amount of time) and financial disclosure (27 agencies ranked both confidential and public financial disclosure as requiring a very significant amount of time). (Q.11)
- 40% of agencies reported needing additional resources. Similar to 2016, human capital was the most requested resource, followed by technology and then budgetary resources. (Q.13-14)
- 65% of agencies reported that ethics staff met with the agency head to discuss the strengths and weaknesses of the ethics program. (Q.16)
- One of the most common ways agency heads supported or strengthened the agency's ethics program was through personal messages to agency employees regarding the importance of ethical behavior. (Q.15)

11. Use the following scale to rate the amount of time your agency spends to administer each item. The first six categories exclude time devoted to SGEs.

Time Spent Scale:

1= No time **2**=Limited amount of time **3**=Moderate amount of time
4=Significant amount of time **5**=Very significant amount of time

Advice and counseling 57 ranked this as a 5
Confidential financial disclosure program 27 ranked this as a 5
Disciplinary process for violations 1 ranked this as a 5
Education and training 18 ranked this as a 5
Outside activity approval 7 ranked this as a 5
Public financial disclosure program 27 ranked this as a 5
Special Government Employees' activities 4 ranked this as a 5
Other (specify) 2 ranked this as a 5 Q11 Table

12. Please estimate the *percentage* of time your agency spends on administering the following:

a. Confidential financial disclosure program

0 to 25% - 100

26 to 50% - 27

51 to 75% - 6

76 to 100% - 1

No response - 2

b. Public financial disclosure program

0 to 25% - 108

26 to 50% - 19

51 to 75% - 4

76 to 100% - 3

No response - 2

c. 201 Requests

0 to 25% - 132

26 to 50% - 0

51 to 75% - 0

76 to 100% - 5

13. Are additional resources needed for the ethics program? (e.g., budgetary, human capital, technology, etc.)

Yes (*go to #14*) **55 (40%)**

No (*skip to #15*) **81 (60%)**

14. Which additional resources are needed? Check all that apply.

Budgetary **29**

Human Capital **48**

Technology **39**

Other (specify) **4 Q14 Table**

15. Describe one concrete action the head of your agency took in 2017 to support or strengthen the agency's ethics program: **Q15 Table**.

16. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2017?

Yes **88 (65%)**

No **48 (35%)**

17. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2017? Check all that apply.

Professional Development

- Competency/skills gap assessment **38**
- Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **60**
- Individual development plans **46**
- Mentoring **83**
- Structured courses (e.g., classroom training, webinars, online modules, etc.) **108**
 - Provided by OGE **97**
 - Provided by my agency **46**
 - Provided by another agency **26**
- Other (specify) **19 Q17 Table**
- None **16**

Programmatic tools

- Job Aids **64**
- Knowledge library (intranet, videos, shared drives, etc.) **102**
- Resources assessment (personnel and/or financial) **43**
- Written standard operating procedures **103**
- Other (specify) **18 Q17 Table**
- None **11**

18. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) conduct a self-assessment to evaluate any aspect of the ethics program in 2017?

- Yes (go to #19) **90 (66%)**
- No (skip to #20) **46 (34%)**

19. What did you assess? Check all that apply.

- Accuracy of advice and counsel **48**
- Timeliness of advice and counsel **49**
- Consistency of advice and counsel **53**
- Administration of confidential financial disclosure program **69**
- Administration of public financial disclosure program **62**
- Compliance with applicable ethics laws and regulations **53**
- Employee knowledge before training **13**
- Employee knowledge after training **26**
- Employee satisfaction with training offered **32**
- Employee perceptions about the agency's ethical culture **23**
- Employee perceptions about the ethics program **21**
- Employee knowledge of the ethics rules **29**
- Knowledge and skills of ethics officials **32**
- Other (specify) **15 Q19 Table**

20. Do you have written policies or procedures in place for the following? Check all that apply.

- Collection of confidential financial disclosure reports **129**
- Collection of public financial disclosure reports **132**
- Following up with delinquent confidential financial disclosure filers **112**
- Following up with delinquent public financial disclosure filers **114**
- Public availability of public financial disclosure reports **104**
- Review/evaluation of confidential financial disclosure reports **114**
- Review/evaluation of public financial disclosure reports **116**
- Issuance of notice of ethical obligations in written offers of employment **78**
- Provision of initial ethics training **107**
- Issuance of ethics notice to new supervisors **79**

21. Does your agency provide ethics program services for any board, commission, or agency that is independent of your agency?

- Yes (please provide the names of the board, commission, or agency) **19 (14%) Q21 Table**
- No **117 (86%)**

22. Please list any significant accomplishments your ethics program achieved in 2017.
Q22 Table

23. Please list the greatest challenges facing your ethics program in the short term (next 1-3 years). **Q23 Table**

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. **Part 5 Table**

PART 6. EDUCATION AND TRAINING

Highlights

- 95% (522) of new Senate-confirmed Presidential appointees received their initial ethics briefing within the 15-day requirement. (Q.32)
 - 91% of new employees received Initial Ethics Training (IET) within the 3-month requirement. (Q.24)
 - 96% of public and confidential financial disclosure filers received required Annual Ethics Training (AET). (Q.34)
 - 60% of agencies provided additional, specialized training. Of those, 41% did so for procurement officials and 39% provided specialized training to supervisors. (Q.40-41)
-

24. How many employees (including special Government employees (SGE)) were required to receive Initial Ethics Training (IET) by December 31, 2017? **336,789**
- a. How many of those employees received IET within the 3-month requirement? **305,498 (91%)**
 - b. How many of those employees received IET beyond the 3-month requirement? **9,888 (3%)**
 - c. How many of those employee have not received IET as of today? **21,403 (6%)⁷**

If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET. **Q24 Table**

25. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. 2638.303, provide the DAEO with the certification required pursuant to 5 C.F.R. 2638.310? (*Response required only from agencies with more than 1,000 or more full-time employees – see Q2*)

- Yes **41**
- No (please explain) **11 Q25 Table**

⁷ The Department of Defense and the Department of Veterans Affairs had the largest proportion (15,921) of the 21,403 employees who had not yet received IET. See each agency's questionnaire response (hyperlink to AQ response page) for the explanation provided by the agency.

26. Did any office not under the direct supervision of the DAEO provide initial ethics training, pursuant to 5 C.F.R. 2638.304? *(Response required only from agencies with more than 1,000 or more full-time employees – see Q2)*
- Yes **15**
 - Did that office provide the certification required pursuant to 5 C.F.R. 2638.310?
 - Yes **10**
 - No (please explain) **5 Q26 Table**
 - No **35**
 - Not Applicable **2**
27. How many non-supervisory positions at or below the GS-8 grade level, or the equivalent, were excluded from the requirement to receive IET during 2017? **4,003**
28. Did the head of the agency complete either initial ethics training or annual ethics training in 2017?
- Yes **121 (89%)**
 - No (please explain) **5 (4%) Q28 Table**
 - Not Applicable **10 (7%)**
29. Did the deputy head of the agency (e.g., Deputy Secretary, Deputy Administrator, etc.) complete either initial ethics training or annual ethics training in 2017?
- Yes **82 (60%)**
 - No (please explain) **3 (2%) Q29 Table**
 - Not Applicable **51 (37%)**
30. How do you deliver IET to new employees? Check all that apply.
- Classroom instruction (in-person) **89**
 - Instructor-led web-based **18**
 - One-on-one briefings **93**
 - Satellite broadcast/videoconference **22**
 - Self-paced web-based **49**
 - Video **14**
 - Written materials **98**
 - Other (specify) **15 Q30 Table**

31. Who developed the IET training materials? Check all that apply.

- My agency **120**
- OGE **55**
- Another agency **17**

How did you access the training materials? Check all that apply.

- OGE resource (e.g., OGE's page on MAX.gov, Desk Officer, etc.) **6**
- Directly from the agency **11**
- Other (specify) **4 Q31 Table**
- Other (specify) **4 Q31 Table**

32. How many new appointees were required to receive ethics briefings by December 31, 2017 (5 CFR 2638.305)? **548**

- a. How many of those appointees received their briefing no later than 15 days after the leader(s) appointment? **522 (95%)**
- b. How many of those employees received their briefing beyond the 15 day requirement? **19 (3%)**
- c. How many of those employees have yet to receive their briefing as of today? **7 (1%)**

If applicable, please explain why some appointees received their briefing beyond the 15 day requirement or have yet to receive their briefing. **Q32 Table**

33. Who provided the briefings to the appointees? **Q33 Table**

34. Required Annual Ethics Training

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)	Compliance Rate
Public filers (OGE Form 278e) Executive Schedule Level I or Level II	361 ⁸	347	96%
Public filers (OGE Form 278e) Non-Executive Schedule Level I or Level II	19,900	19,120	96%
Confidential filers (OGE Form 450, 450A, and OGE-approved alternative confidential financial disclosure forms)	362,255	347,904	96%
Other employees required by 2638.307(a) (employees appointed by the President; employees of the Executive Office of the President; Contracting Officers; or, other employees designated by the head of the agency.)	93,454	93,130	99.6%
TOTAL	475,970	460,501	(97%)

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training.

Q34 Table

⁸ Agencies may have included Executive Schedule employees in the “required” and “received” columns employees who were actually *non*-Executive Schedule employees.

35. How do you deliver annual ethics training to Executive Schedule Level I or Level II employees? Check all that apply.

- Classroom instruction (in-person) **47**
- Instructor-led web-based **5**
- One-on-one briefings **53**
- Video **9**
- Satellite broadcast/videoconference **6**
- Written materials **32**
- Other (specify) **60 Q35 Table**

36. How do you deliver annual ethics training to non-Executive Schedule Level I or Level II public filers? Check all that apply.

- Classroom instruction (in-person) **99**
- Instructor-led web-based **16**
- One-on-one briefings **69**
- Self-paced web-based **50**
- Video **25**
- Satellite broadcast/videoconference **25**
- Written materials **75**
- Other (specify) **16 Q36 Table**

37. How do you deliver annual ethics training to confidential filers and other covered employees not required to file a public report? Check all that apply.

- Classroom instruction (in-person) **94**
- Instructor-led web-based **21**
- One-on-one briefings **43**
- Self-paced web-based **64**
- Video **33**
- Satellite broadcast/videoconference **27**
- Written materials **75**
- Other (specify) **19 Q37 Table**

38. Who developed the annual training materials? Check all that apply.

- My agency **121**
- OGE **49**
- Another agency **25**

How did you access the training materials? Check all that apply.

- OGE (e.g., OGE's page on MAX.gov, Desk Officer, etc.) **10**
- Directly from the agency **16**
- Other (specify) **10 Q38 Table**

39. Did you provide annual ethics training to other employees *not otherwise required by regulation* to receive training?

- Yes **103 (76%)**
- No **33 (24%)**

40. Did you provide additional, specialized ethics training during 2017?

- Yes (*go to #41*) **82 (60%)**
- No (*go to end of this section*) **54 (40%)**

41. Which groups did you target? Check all that apply.

- All agency personnel (e.g., including individuals not required by regulation to receive annual training) **47**
- HR personnel **18**
- IT personnel **11**
- Procurement personnel **34**
- Supervisors **32**
- Other (specify) **47 Q41 Table**

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. **Part 6 Table**

PART 7. ADVICE AND COUNSELING

Highlights

- Employees most frequently sought ethics guidance on: (1) gift acceptance (53 agencies ranked this #1) and (2) financial disclosure reporting (30 agencies ranked this #1). (Q.42)
- 87% (118) of agencies memorialized their ethics advice and counseling. (Q.43)
- Agencies received 1,819 notifications of employees’ negotiations for or agreements of future employment with a non-Federal entity, as required by the STOCK Act. (Q.44)

42. From the list below, select the three topics that your employees most **frequently** sought guidance on in 2017.

Conflicting financial interests Selection 1: 19 Selection 2: 5 Selection 3: 8
Gift acceptance Selection 1: 53 Selection 2: 19 Selection 3: 16
Financial disclosure reporting Selection 1: 30 Selection 2: 30 Selection 3: 16
Impartiality in performance of official duties Selection 1: 2 Selection 2: 10 Selection 3: 9
Misuse of position, government resources, and information Selection 1: 3 Selection 2: 5 Selection 3: 6
Outside employment/activities Selection 1: 17 Selection 2: 41 Selection 3: 28
Post-employment restrictions Selection 1: 8 Selection 2: 12 Selection 3: 31
Travel, subsistence, and related expenses from non-federal sources Selection 1: 4 Selection 2: 14 Selection 3: 16
Other (specify) Selection 1: 0 Selection 2: 0 Selection 3: 6 Q42 Table

43. Has your agency ethics program implemented any of the following practices? Check all that apply.

- Conduct customer satisfaction survey(s) **15**
- Periodic supervisory review of advice given **72**
- Guided discussion among staff **88**
- Memorialize advice and counsel **118**
 - All **56**
 - Some **62**
- Use advice and counsel templates **75**
- Use a database Check all that apply: **70**
 - to track timeliness **61**
 - to conduct research **43**
 - to identify topics for training **26**
- Other (specify) **11 Q43 Table**
- None **6**

44. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2017: **1,819**

45. How do you make employees aware of the availability of post-employment counseling? Check all that apply.

- Part of out-processing **121**
- Emails **82**
- Training **101**
- Regulation or policy **23**
- Other (specify) **22**
- None **0**
- Not Applicable **3**

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. **Part 7 Table**

PART 8. PUBLIC FINANCIAL DISCLOSURE

Highlights

- The compliance rate for filing public financial disclosures was 99%. (Q.46)
- 13,755 periodic transaction reports were filed. (Q.49)
- 99% of agencies reported using some form of electronic financial disclosure system for either their public filers, confidential filers, or both. (Q.57)
- 55% of agencies reported using only OGE's *Integrity* electronic financial disclosure system for public filers. (Q.58)

46. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2017, **excluding SGEs**, and the number of reports actually filed (i.e., received in hand) by December 31, 2017.

OGE Form 278e Reports Required to be Filed in CY 2017

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	Total
Nominee/ New Entrant	Required	454	561	1,066	1,011	1,728	4,820
	Filed	454	553	1,055	995	1,699	4,756 (99%)
Annual	Required	300	142	9,566	165	8,912	19,085
	Filed	300	142	9,562	164	8,784	18,952 (99%)
Termination	Required	323	540	1,034	1,090	1,012	3,999
	Filed	321	534	1,020	1,073	991	3,939 (98%)
Combination ¹	Required	39	43	168	39	308	597
	Filed	39	43	167	35	306	590 (99%)
Total	Required	1,116	1,286	11,834	2,305	11,960	28,501
	Filed	1,114 (99.8%)	1,272 (99%)	11,804 (99.7%)	2,267 (98%)	11,780 (98%)	28,237 (99%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc.

Example: For new entrant and termination reports: If an employee starts/leaves the agency on December 15, 2017, and s/he files a new entrant/termination report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant/termination report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 15. You instead would include the employee in your 2018 Questionnaire’s new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q46 Table**

47. Does the human resources office(s) notify the DAEO of all appointments to and terminations from public filing positions?

- Yes **90 (66%)**
- No (please explain) **25 (18%)**
- Not Applicable **21 (15%)**

48. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports, **excluding SGEs**.*

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278e Reports	3,802	170	67

49. Number of periodic transaction reports filed, **excluding SGEs: 13,775**

* Note about counting: Count the total number of periodic transaction reports filed.

Example 1: If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the table above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12” in the table.

50. Extensions and late fees for periodic transaction reports, *excluding SGEs*:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278 T Reports	317	440	77

51. Number of public financial disclosure filers reported in calendar year 2017 to the Attorney General for failure to file: **8**

52. How many requests for public financial disclosure reports did you receive in 2017: **6,730**

53. Does your agency use an automated system (e.g., Excel, Access, custom database) to track the administration of the financial disclosure program?

- Yes **100 (74%)**
- No **36 (26%)**

54. Did you receive timely notification of all employees required to file a new entrant financial disclosure report?

- Yes **99 (73%)**
- No **37 (27%)**

55. Does your agency require an intermediate review by someone other than ethics staff (e.g., supervisors and team leads) for public financial disclosure reports?

- Yes **27 (20%)**
- No **109 (80%)**

56. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply.

- Repeated reminders to the filer **104**
- Notify supervisor **79**
- Certified letter to the filer **20**
- Notify agency head or other senior official **58**
- Referral to Department of Justice **12**
- Other (specify) **7 Q56 Table**
- None **0**
- Not Applicable **32**

57. Does your agency use an electronic financial disclosure filing system (e-filing system)?
Note: This includes *Integrity*.

- Yes (go to #58) **134 (99%)**
- No (skip to end of this section) **2 (1%)**

58. Which system does your agency use? Check all that apply.

- Integrity* ONLY (if only *Integrity* is selected, go to Part 9) **75**
- Integrity* AND Other (specify below) **58 Q58 Table**
- Other ONLY (specify below) **1**

59. Indicate your fiscal year 2017 actual and fiscal year 2018 projected costs for using the e-filing system. Note: Because OGE does not charge fees to use *Integrity*, there are no reportable costs associated with the use of *Integrity*.

- a) total FY 2017 actual costs: **\$8,473,544**
- b) total FY 2018 projected costs: **\$8,981,074**
- c) amount paid to a non-federal vendor in FY 2017: **\$3,042,822**
- d) amount projected to be paid to a non-federal vendor in FY 2018: **\$3,100,978**
- e) amount paid to a federal agency in FY 2017: **\$4,011,107**
- f) amount projected to be paid to a federal agency in FY 2018: **\$4,496,622**
- g) amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2017: **\$4,884,961**
- h) amount projected for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2018: **\$4,952,044**
- i) number of public financial disclosure filers who filed electronically in FY 2017: **18,433**
- j) number of public financial disclosure filers projected to file electronically in FY 2018: **18,191**
- k) number of confidential financial disclosure filers who filed electronically in FY 2017: **261,984**
- l) number of confidential financial disclosure filers projected to file electronically in FY 2018: **266,801**

60. Indicate which forms your agency uses the e-filing system for. Check all that apply.

- Public Financial Disclosure (OGE Form 278e) **58**
- Periodic Transaction (OGE Form 278-T) **49**
- Confidential Disclosure Forms (OGE Form 450, 450A, or OGE-approved alternative form) **56**

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. **Part 8 Table**

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

Highlights

- The compliance rate for filing confidential financial disclosures was 99.5%. (Q.61)

61. Report the number of confidential financial disclosure reports required to be filed by December 31, 2017, **excluding SGEs**, and the number of reports actually filed by December 31, 2017.

Confidential financial disclosure reports required to be filed in CY 2017:

Type of Report	# Required to File (by December 31)	# Filed		
		OGE Form 450	OGE Form 450A	OGE- approved alternative form
OGE Form 450	357,032	239,719	50,014	65,601
Total	357,032	355,334 (99.5%)		

Example: For new entrant reports: If an employee starts the agency on December 15, 2017, and files a new entrant report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 16. You instead would include the employee in your 2018 Questionnaire’s new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q61 Table**

62. Number of OGE 450, 450A, or OGE-approved alternative forms granted filing extensions in 2017: **4,971**

63. What steps do you take to collect delinquent confidential financial disclosure reports?

- Repeated reminders to the filer **98**
- Notify supervisor **85**
- Certified letter to the filer **9**
- Notify agency head or other senior official **57**
- Other (specify) **9 Q63 Table**
- None **0**
- Not Applicable **38**

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. **Part 9 Table**

**PART 10. REMEDIES AND ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL,
AND CIVIL STATUTES**

Highlights

- Recusals represented 70% of remedial actions taken in response to information regarding a conflict of interest reported on a new entrant, annual, or termination public financial disclosure report. (Q.65)
 - Agencies granted 340 waivers under 18 USC § 208 (Q.68 and 70)
 - 1,235 disciplinary actions were taken based on violations of the Standards of Conduct. (Q.72)
 - 69 referrals were made to the Department of Justice of potential violations of the criminal conflict of interest statutes. (Q.74)
-

64. Number of public financial disclosure filers who took specific remedial actions because of information on a new entrant, annual, or termination report (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2017: **457**

Don't know/don't track **33 (24%)**

65. Number of individual remedial actions taken because of information on a new entrant, annual, or termination public financial disclosure (OGE Form 278e) report in 2017:

Recusals **1,197**

Divestitures **419**

Resignations from outside positions **51**

Reassignments **0**

Other not listed (specify) **31 Q65 Table**

Don't know/don't track **33 (24%)**

66. Number of public financial disclosure filers who took specific remedial actions because of information on periodic transaction reports (e.g., divestiture, resignation from outside position, written disqualification, U.S.C. § 208 waiver, reassignment, etc.) in 2017: **34**

Don't know/don't track **33 (24%)**

67. Number of remedial actions taken because of information on a periodic transaction report in 2017:

Recusals **17**
Divestitures **11**
Reassignments **0**
Other not listed (specify) **8**

Don't know/don't track **33 (24%)**

68. Number of § 208(b)(1) waivers granted in 2017: **132**

69. Number of § 208(b)(1) waivers provided to OGE in 2017: **73**⁹

70. Number of § 208(b)(3) waivers granted in 2017: **208**

71. Number of § 208(b)(3) waivers provided to OGE 2017: **203**¹⁰

72. Number of disciplinary actions taken based wholly or in part upon violations of the Standards of Conduct provisions (5 CFR part 2635) in 2017. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: **1,235**

Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

Subpart A **301 (24%)**
Subpart B **28 (2%)**
Subpart C **10 (1%)**
Subpart D **35 (3%)**
Subpart E **45 (4%)**
Subpart F **10 (1%)**
Subpart G **683 (55%)**
Subpart H **145 (12%)**

⁹ OGE subsequently received all waivers.

¹⁰ OGE subsequently received all waivers.

73. Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 208, and 209, in 2017. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: **19**

Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

- 18 U.S.C. §203 **1 (5%)**
- 18 U.S.C. §205 **2 (11%)**
- 18 U.S.C. §207 **0 (0%)**
- 18 U.S.C. §208 **15 (79%)**
- 18 U.S.C. §209 **1 (5%)**

74. Number of referrals made to the Department of Justice of potential violations of the criminal conflict of interest statutes (including 18 U.S.C. §207) in 2017: **69**

- a. How many of those referrals were accepted for prosecution **9 (13%)**
- b. How many of those referrals were declined for prosecution **50 (72%)**
- c. How many of those referrals were pending DOJ's decision as of December 31, 2017 **14 (20%)**
- d. How many of those referrals resulted in disciplinary or corrective action **16 (23%)**
- e. How many of those referrals resulted in a determination not to take disciplinary or corrective action **15 (22%)**
- f. How many of those referrals are pending a determination as to whether disciplinary or corrective action will be taken **15 (22%)**

75. Which individual(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) with OGE? Check all that apply.

- DAEO/ADAEO **95**
- General Counsel **42**
- Agency Head **8**
- IG **46**
- Other (specify) **9 Q75 Table**

76. Did your agency submit all referral(s) and disposition(s) of the referral(s) to OGE via OGE Form 202 (as required by 5 C.F.R. 2638.206(a))?

- Yes **28 (21%)**
- No **1 (1%)¹¹**
- Not Applicable **107 (79%)**

ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds. **Part 10 Table**

¹¹ OGE subsequently received the OGE Form 202.

PART 11. ETHICS PLEDGE ASSESSMENT¹²

Highlights

- Agencies reported that, for purposes of the Ethics Pledge, there were 2,626 appointments to full-time, non-career positions. Of the 2,599 individuals appointed to those positions,¹³ 2,584 were required to sign the Pledge.¹⁴ Of those required to sign, 2,559 signed and 25 did not.
 - Agencies reported that 80 of the full-time, non-career appointees were registered lobbyists during the two years prior to their appointment. (Q.80)
 - The White House granted waivers to at least 37 individuals across 12 agencies.¹⁵ (Q.81)
 - Agencies reported no violations of the Ethics Pledge. (Q.82)
-

77. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service (SES), Schedule C, etc.) appointed to or by your agency from January 1 through December 31, 2017?

NOTE: For guidance on what constitutes a full-time non-career appointee for purposes of the Ethics Pledge see [LA 17-03](#) available at www.oge.gov.

- Yes **70 (51%)**
- No (*skip to #83*) **66 (49%)**

Please type comments in the box below. **Q77 Table**

¹² The questionnaire asks about the Ethics Pledge required by Executive Order 13770. The questionnaire did not collect data on individuals appointed prior to January 1, 2017 who may have been required to sign the Ethics Pledge in 2017.

¹³ OGE determined that 2,599 distinct individuals were required to sign the Pledge by subtracting from 2,626 (Q.78) the 27 individuals who were Pledge appointees at more than one agency during 2017 (23 who signed at their original agency and were not required to sign again at their new agency (line b. in Q.79) and 4 who did not sign at their original agency but did sign at their new agency (included in line c. of Q.79)). Once an individual signs the Pledge, that person is not required to sign it again upon appointment to a Pledge position at another agency, if there is no break in service.

¹⁴ OGE determined that 2,584 individuals were required to sign the Pledge by subtracting from 2,599 the 15 individuals who were not required to sign the Pledge (13 individuals who occupied exempt non-policymaking positions (line a. in Q.79) and 2 Inspectors General who were appointed in 2017, but prior to January 20, 2017 (included in line c. of Q.79)).

¹⁵ The White House granted Paragraph 6 waivers to an unspecified number of Executive Office of the President appointees relating to news organizations, White House Office Commissioned officers relating to covered political organizations, and former Jones Day employees in certain circumstances.

78. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2017, and indicate the number who did and did not sign the Ethics Pledge. (NOTE: Please include all appointees who did not sign, regardless of whether or not they were required to sign. Additional explanatory information is requested in the next question.)

Number of Full-Time Non-Career Appointees	Type of Full-Time Non-Career Appointees					
	by Category					
	PAS	PA	Non-career SES	Schedule C	Other	Total
Appointed 01/01/2017 – 12/31/2017	235	544	577	1,175	95	2,626
Signed the Ethics Pledge	226	518	572	1,148	95	2,559 ¹⁶
Did not sign the Ethics Pledge	9	26	5	27	0	67

If for any field above you are unable to provide a complete response, please explain in the box below. You may also add additional comments. **Q78 Table**

¹⁶ This total includes four appointees from two agencies who signed the Ethics Pledge late.

79. For each appointee who did not sign the Ethics Pledge, find the appropriate rationale(s) and indicate the total number of appointees who fit into that category.

Rationale for Not Signing the Ethics Pledge	Number and Type of Full-Time Non-Career Appointees Who Did Not Sign the Ethics Pledge					
	PAS	PA	Non-career SES	Schedule C	Other	Total
a. Occupy an exempt non-policymaking position (Schedule C or other comparable authority)	0	0	0	13	0	13
b. Appointed without break in service after serving in another position for which the Ethics Pledge was already signed	6	9	4	4	0	23
c. Other (explain below)	3	17	1	10	0	31 ¹⁷

If other, explain here. You may also use the box below to provide a complete response or to add additional comments. **Q79 Table**

80. How many appointees appointed between January 1 and December 31, 2017 and subject to the Ethics Pledge were registered lobbyists during the two years prior to their appointment? **80**

Please type comments in the box below. **Q80 Table**

¹⁷ Of these 31, 2 were not required to sign the Pledge (Inspectors General appointed in 2017 but prior to January 20, 2017), 4 were late signers (appointees transferred to another agency before signing but signed at their new agency), and 25 were required to sign but did not (19 appointees left before signing, 2 appointees moved into a non-Pledge position, and 4 at the Department of Veterans Affairs have not signed the Pledge).

81. Section 3 of Executive Order 13770 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted; the names of individuals granted waivers by your agency in 2017; and which of the Pledge paragraphs were implicated.

	Number of Ethics Pledge Waivers Granted By Pledge Paragraph	Name(s) of Individual(s) Granted Ethics Pledge Waivers
Paragraph 1	1	Marcus Peacock
Paragraph 2	0	
Paragraph 3	2	John F. Kelly, Marcus Peacock
Paragraph 4	0	
Paragraph 5	0	
Paragraph 6	25¹⁸	Randall Schriver, Andrew Finch, Chad Readler, Christopher Wray, Heather Norby, Jonathan Wachtel, Margaret Dougherty, Terry Brandstad, and Edward McMullen, Derek Kan, Anthony Sayegh; Brian Callanan; Heath Tarbert, Josh Pitcock, James Ayers, Kellyanne Conway, Daniel Epstein, Charles Herndon, Claire Murray, Andrew Olmem, Joshua Pitcock, John Eisenberg, Para.6 waivers given to EOP appointees relating to news organizations, WHO Commissioned officers relating to covered political orgs., and former Jones Day employees in certain circumstances
Paragraph 7	14	Kristi Boswell, Kailee Tkacz, Maggie Lyons, and Brooke Appleton, Lance Leggitt, Keagan Lenihan, Erik Baptist, Dennis Lee Forsgren, Jeffrey Sands, Josh Pitcock, Michael Catanzaro, Shahira Knight, Andrew Olmem, Joshua Pitcock
Paragraph 8	0	
Paragraph 9	0	
Other (explain below)	0	

¹⁸ The total number reported by the 136 agencies was 26. However, in their respective questionnaire responses, the White House Office and the Office of the Vice President both counted the same waiver issued to one individual who served in both the Offices. We counted that as one waiver rather than two distinct waivers.

If other, please explain here. Other comments may also be provided in the box below.

Q81 Table

82. If applicable, please provide information on any violations of the Ethics Pledge and enforcement actions taken as a result. **No responses.**

PART 12. ADVISORY COMMITTEES/ SPECIAL GOVERNMENT EMPLOYEES (SGEs)

Highlights

- Agencies reported that there were 42,904 special Government employees as of December 31, 2017. (Q.89)
 - Agencies reported managing a total of 877 FACA committees with 33,460 members and 285 non-FACA committees with 1,902 members. (Q.84-87)
 - 91% of SGEs serving on a board, commission, or committee received Initial Ethics Training before or at the first meeting. (Q.92)
-

83. Does your agency have any FACA or Non-FACA advisory committees, boards, or commissions?

- Yes (go to #84) **64 (47%)**
 No (go to #88) **72 (53%)**

84. Number of FACA advisory committees: **877**

85. Number of FACA advisory committee members: **33,460**

86. Number of non-FACA advisory committees, boards, or commissions: **285**

87. Number of non-FACA advisory committee, board, or commission members: **1,902**

88. Does your agency have any SGEs (as of December 31, 2017)?

- Yes (go to #89) **72 (53%)**
 No (go to end of this section) **64 (47%)**

89. Number of special Government employees (SGEs) as of December 31, 2017: **42,904**

90. Does your agency have written policies or procedures for designating SGE status?

- Yes **39 (54%)**
 No **24 (33%)**
 Not applicable (specify why) **9 (13%) Q90 Table**

91. Does the written policy or procedure include consultation with the ethics office?

- Yes **37 (51%)**
- No **13 (18%)**
- Not applicable (specify why) **22 (31%) Q91 Table**

92. How many SGEs serving on a board, commission, or committee were required to receive IET by December 31, 2017? **3,653**

- a. How many of those SGEs received IET before or at the beginning of the first meeting? **3,327 (91%)**
- b. How many of those SGEs received IET after the first meeting? **227 (6%)**
- c. How many of those SGEs have not received IET as of today? **99 (2%)**

If applicable, please explain why some SGEs received IET after the first meeting or have yet to receive IET. **Q92 Table**

93. If yes, which office provides the training? **Q93 Table**

94. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2017 and the number of reports actually filed by December 31, 2017.

Financial disclosure reports required to be filed by SGEs in CY 2017:

Type of SGE	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
Advisory Committee Members (FACA)	26,357	24,673 (94%)	28	28 (100%)
Advisory Committee Members (non-FACA)	320	301 (94%)	0	0 (100%)
Experts/Consultants	2,111	2,102 (99.5%)	51	51 (100%)
Board Members	265	251 (95%)	13	13 (100%)
Commissioners	47	47 (100%)	15	15 (100%)
Other	169	166 (98%)	8	8 (100%)
TOTAL	29,269	27,540 (94%)	115	115 (100%)

Example: For new entrant reports: If an employee starts with the agency on December 15, 2017, and files a new entrant report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 15. You instead would include the employee in your 2018 Questionnaire's new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q94 Table**

95. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. 2634.904(b): **32,982**

96. Extensions and late filing fees for SGE financial disclosure reports

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278e Reports	28	1	0

97. Number of SGE OGE Form 450 Reports or OGE-Approved Alternative Forms granted filing extensions: **72**

ADDITIONAL COMMENTS FOR PART 12. Please indicate the question number to which the comment corresponds. **Part 12 Table**

ADDITIONAL QUESTIONNAIRE COMMENTS: Additional Comments Table

APPENDIX - Comments¹⁹

7. Indicate which elements of the ethics program have been delegated outside of the supervisory chain of the DAEO or ADAEO. Specify Other. **Q7 Table**

None. The DAEO and/or ADAEO is directly involved in the above functions.
While DOJ's DAEO has authority over all of these elements of the ethics program (and more), ethics program duties are not performed solely by employees in the DAEO's direct supervisory chain.
Deputy Ethics Counselors approve employee requests to engage in unpaid, non-legal, and non-EEO law, outside employment.
Elements identified in response above are for field center activities.
No elements delegated outside Agency
We have delegated ethics duties to three other OGC staff members to perform ethics duties outside of the DAEO and ADAEO. The title for two of these individuals are Deputy Ethics Official and Deputy Ethics Officer. The other individual is our Administrative Specialist.
Gift Travel from a Non-Federal Source
Senior management official over whom the DAEO and ADAEO do not have supervisory authority serves as a deputy ethics official to correspond with OGE on program administration matters and to receive ethics inquiries in the event other ethics officials are unavailable. All ethics advice and determinations are coordinated with the DAEO and ADAEO.
The DAEO has supervisory authority over the Ethics staff at U.S. Postal Service Headquarters. The Postmaster General has delegated to the Office of Inspector General (OIG) responsibilities relating to financial disclosure program, ethics advice and counseling, education and training, and the public financial disclosure program with respect to OIG employees.

9. Describe the extent of [contractors'] support. **Q9 Table**

During calendar year 2017, the CSB engaged a temporary contractor to assist on records management and other ethic related support matters.
Training.
The CFTC Office of Data and Technology uses contractor support to manage technical issues related to the Ethics Management and Tracking (EMAT) System. EMAT is the electronic financial disclosure system CFTC Ethics uses to facilitate the collection of OGE 450 Confidential Financial Disclosure Reports and CFTC Form 185 Certification of Compliance with the Commission's Conduct Regulation.

¹⁹ Comments of "none" or "N/A" have been removed.

Electronic financial disclosure reporting system (FDonline).
We have a contractor for our OGE 450 e-filing system.
Contract attorneys assist in answering ethics questions from the office helpdesk on their assigned duty day. The contractor will address the matter (in consultation with ADAEO or DAEO)
An administrative assistant working under contract for the DSS Office of General Counsel performs administrative functions such as gathering data regarding ethics training completion, and notifying the DAEO/ADAEO of new hires who need to be notified of requirement to file financial disclosure reports.
The National Guard Bureau uses contractors at its headquarters to provide ethics program support, FDM administration services, and training coordination.
Contractors conduct technical reviews of OGE 278 reports.
Some offices used contractors to support tasks relating to administrative functions, IT, database & records management, and Presidential transition.
They provide administrative support and do not perform any inherently governmental functions.
Admin Support.
HUD OGC - FD Online OIG - Contractors are providing training and support for the Integrity & Compliance Program
Many DOJ components utilize contractors to support the ethics program. This includes IT services such as developing and using tracking databases and spreadsheets, developing and maintaining websites, and reporting and administrative tasks. Some components utilize contractor attorneys and paralegals for program support including assistance with ethics opinions and reviewing requests for approval of outside employment, preparing reports for OGE, financial disclosure review and other paralegal duties.
Agency components utilize contractors for administrative and technical review and procedures.
Administrative Assistant -requesting FDM accounts, creating spreadsheets for filers Computer Programmer for changes to Financial Disclosure Tracking Database
Track Training and website development and support
Filing, record keeping, administrative tasks, A/V support for training
IT Contractors provide support for e-filing system for OGE Form 450's.
Contractors in the Office of the Executive Director provide personnel information to ethics officials, and provide IT support for ethics training.
Administrative Support
Department of Commerce provides ethics support pursuant to interagency agreement with GCERC

Personal services contractors participate in ethics training and comply with ethics rules, regulations and policies.
Support for the Ethics Program Tracking System is provided by contractors in the areas of Information Technology, Operations and Maintenance. Additionally, some centers utilize contractors for administrative support and clerical functions as well as preliminary review and tracking of financial disclosure reports.
eFile programming support
Supports training.
We have one contract employee software engineer who is helping to build our OMB Ethics Portal which contains an event clearance application, our electronic 450 system, and a tracking system for annual training.
In 2017, the OGC General Law & Ethics Group (GLE) had 1 full-time employee out of the office on a temporary, long-term absence. From September 2017 to present, we have employed one contractor employee to assist in supporting the ethics program. In addition to other GLE matters, the contractor employee assisted in providing ethics advice and reviewing speaking engagement forms. All advice/guidance was reviewed by the DAEO, ADAEO, or one of the GLE ethics counsels.
we have a contractor company that assists with our personal trading compliance system, which we use for our sup regs.
Admin and FDM system duties to include OGE 450 and OGE 278 report notification/review/tracking and annual ethics training notification/tracking for all report filers.
Assists the DAEO and ADAEO with final actions performed by the DAEO and ADAEO in all respects as per agreement with OGE.
Financial Disclosure Systems Database (FDS) programming and maintenance.

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. **Part 4 Table**

Question 3. I erroneously answered this wrong for the 2016 Survey. The DAEO has been in the position since April 2008 so 2017 would have been her 9th year. Question 6. The ADAEO is under the supervision of the DAEO. The DAEO is under the supervision of the Executive Director of the agency.
4. The system doesn't provide the question: Has OGE been provided a copy of the ADAEO's designation letter? The answer is "Yes." 10. Part-time ethics officials serve 1-10 hours per week as financial disclosure review officers. They may not, necessarily, have ethics duties as a distinct element in their performance appraisals, but can, and typically, do, include financial disclosure reviews as part of their performance narrative. 10b. As a Presidentially appointed, Senate confirmed official, the DAEO does not have a formal performance appraisal report and therefore has no performance standards

Our former ADAEO resigned from the agency in January, 2017 and that position remained empty for the remainder of 2017. As of January 2018, the ADAEO is Lenore Ostrowsky, Delegated the Authority of the General Counsel and Senior Attorney Advisor. The DAEO is on leave until April 2018.

#10: CFTC has implemented standard performance elements for all staff and managers across the agency. Therefore, ethics duties are not listed as a performance element for any CFTC staff. However, any ethics work performed by staff is reviewed and assessed in quarterly and annual performance appraisals against the standard performance elements.

Question 2: CEQ's response in the 2016 Agency Ethics Questionnaire mistakenly counted detailees as full-time agency employees. The correct number of full-time employees at CEQ as of Dec. 31, 2016, CEQ was 21. Question 3 (DAEO Grade Level): The DAEO is CEQ's Deputy General Counsel which is paid at an administratively determined pay rate equivalent to a GS-15. Question 6: CEQ relies on its Director of Finance and Administration for information needed to properly administer the ethics program. However, this person is not under the supervision of the DAEO/ADAEO. Question 10: CEQ does not have formal performance standards, however, the position descriptions for the Attorney-Advisor who serves as the ADAEO and the Deputy General Counsel who serves as the DAEO include the ethics duties in the respective position descriptions.

#4 - Pretrial Services Agency, our sister agency, does a preliminary review and approval of that agency's outside activity requests. They then submit to ADAEO for final review and approval.

Question #4. New Principal Deputy General Counsel came onboard in September 2017 as detail from another governmental agency. Initial first months have been on learning the Agency and focusing on operations and management of the Office of the General Counsel. She has not performed any DAEO/ADAEO duties. However, appointing memo is pending with the Director of DIA for signature. A copy of the Appointing memo will be provided to OGE.

10. The Office of Ethics is USDA's centralized and consolidated Ethics Office servicing employees across the entire Department of Agriculture in Washington, DC, all 50 States, and those USDA employees stationed around the globe. All 21 employees in the Office of Ethics have ethics duties as a distinct element in their performance standards.

The DAEO and ADAEO exercise technical supervision over all Army attorneys regarding ethics program issues even though they are not in the rating chain of most Army attorneys.

Q4. - ADAEO letter has been provided to OGE. (field is missing from the data input screen). Q5. - did not include indirect support such as IT, HR, etc. Q6.&7. - A very few DoD DDAEO organizations do have personnel outside the DAEO supervisory chain performing administrative tasks for the ethics program.

Q#6 - The DAEO has supervisory authority over 24 OGC Ethics Division employees in question number 5. Because the DAEO has delegated daily ethics operations in certain Operating and Staff Divisions within the Department to persons not in her office, she does not have direct supervisory authority over those individuals.

7. DOJ has 32 attorneys serving as Deputy DDAEOs in its Components, Bureaus, and Divisions and Offices. In addition to the DDAEOs, the Departmental Ethics Office(DEO) in the Justice Management Division(JMD)oversees the Department-wide ethics program and provides direct advice to DOJ's senior

<p>leadership offices, to JMD and to certain components. DEO's programmatic functions include issuance of Department-wide guidance, providing ethics information, advice and counsel to DDAEOs, preparation of ethics training materials, delivery of ethics training, ethics program reporting, overall management of financial disclosure and retention of ethics documents. DEO is within the direct supervisory chain of the DAEO and Alt DAEO.</p>
<p>Question 6: The DAEO/ADAEO has supervisory authority over some of the employees that perform the ethics program duties</p>
<p>#10 All ethics officials have ethic duties as a distinct element in their performance standards.</p>
<p>Q2: Note: IRS has 14,352 F/T seasonal employees Fiscal Service has 14 F/T seasonal employees and SIGTARP has 1 F/T seasonal employee not included in the above 79,543 total. Q5: Some individuals who only performed ethics duties for part of the year (i.e., departed) are included. Q6: at HQ, direct supervisory chain, but components generally report to bureau chief counsel, subject to oversight by DAEO.</p>
<p>Q6. DAEO and ADAEO have supervisory authority over seven HQ employees identified in Q5. Q10. The seven HQ employees noted in Q6 comment have ethics duties as a distinct element in their performance standards.</p>
<p>#10 All SES-equivalent supervisors have an ethics element in their performance plans. Because the DAEO and DEO are not supervisors they do not. However, their performance in administering the ethics program is evaluated under each element in their plans.</p>
<p>#10 All SES-equivalent supervisors have an ethics element in their performance plans. Because the DAEO and DEO are not supervisors, they do not. However, their performance in administering the ethics program is evaluated under each element in their plans.</p>
<p>#6 - The DAEO/ADAEO have direct supervisory authority over the Senior Ethics Program Specialists and Ethics Unit support staff. The DAEO/ADAEO have oversight authority for the Deputy Ethics Counselors regarding ethics matters. #10 FDIC performance standards are competency based rather than functional area/task based.</p>
<p>Regarding Part 4, 3(k): The question did not appear on the electronic copy of the Questionnaire. Christian S. White was designated as the FTC's DAEO in 1979. The FTC's Ethics Team does not have documentation confirming that OGE was provided a copy of his designation letter. However, to the best of Mr. White's recollection, it was provided. OGE has long since recognized/acknowledged Mr. White's designation as the FTC's DAEO.</p>
<p>#6 Designated attorneys in the OIG and Civilian Board of Contract Appeals serve as ethics officials for their respective organizations and coordinate with the DAEO in OGC. DAEO does not have supervisory control over these attorneys.</p>
<p>JUSFC is a nano-agency of four FTEs. The DAEO and ADAEO perform all ethics functions.</p>
<p>Q.5 The DC metro area includes the employees at the Goddard Space Flight Center and NASA Office of Inspector General located in the Washington DC metro area. Q. 7 - These elements identified are for field center activities.</p>

#6 The Counsel to the IG serves as a DEO for the IG's office. The DAEO does not supervise this one employee.
The question re: copy of DAEO's appointment does not appear unless the document is printed. The answer is yes.
4. NCUA is not on the GS pay scale. We use our own CU scale. ADAEO is a CU-15, roughly the equivalent of a GS 15. 6. The DAEO has supervisory authority over the ADAEO and the other Central Office ethics officer. Neither the DAEO nor the ADAEO has official supervisory authority over regional ethics officers, but the ADAEO coordinates and manages the ethics program. The regional ethics officers consult with central office ethics officials on any novel or complex issue. 10. Ethics duties are in the position description rather than performance standards for regional ethics officers because they are part of the executive staff who all have the same performance standards. Most of the executive staff do not perform ethics functions.
the DAEO/ADAEO and all ethics officials have ethics in their performance standards.
#2 Number includes IPA. Total without IPAs is 1260
Questions 6 and 7. The DAEO/ADAEO do have direct supervisory authority over employees in the DC Metro Area and over two employees outside the D.C. Metro Area. The DAEO/ADAEO do not have supervisory authority for employees who provide ethics advice, counseling, education, and training outside the DC Metro area, but these employees are required to consult with the DAEO/ADAEO before providing advice (with limited exceptions for routine advice).
For question #7, no elements of the ethics program have been delgated outside the supervisory chain of the DAEO or ADAEO.
#7 OGE outsources its HR function to BFS at Treasury. BFS is responsible for sending the ethics notification to new hires in the offer letter.
As of January 2018, our General Counsel and DAEO is Mark Paoletta. He is a non-career SES/political appointee who has prior ethics experience. Initial ethics training for all but OMB political appointees and U.S. Digital Services (USDS) employees is handled by the EOP Office of Administration as part of new employee orientation. Political appointees and USDS employees receive in person training with an OMB ethics attorney.
Answer 6: The ADAEO left in September, so the DAEO no longer supervises that former employee.
In reference to question 6, the DAEO has supervisory authority over the ADAEO, but not over the deputy ethics officials who serve in OSC's regional offices.
All attorneys in OIG OGC are ethics counselors.
2. The number of employees does not include detailees from other agencies or military personnel assigned to OVP. 3i. Not applicable to political appointees. 4i. Not applicable to political appointees. 10. Not applicable to political appointees.
3. Marcos Araus departed Peace Corps on January 6, 2018. The new DAEO is General Counsel Robert Shanks (SES or equivalent schedule). He was appointed on January 12, 2018.

While the DAEO does not supervise the ADAEO nor the Legal Administrative Specialist who helps perform ethics duties, all 3 positions report to the General Counsel.
Q7. Human Resources staff member assigns new employees to computer-based initial ethics training. Training was prepared and recorded by ethics staff under the DAEO.
The total number included (3), includes the DAEO, ADEAO and one ethics official. The DAEO has supervisory authority over the ADEAO and ethics official.
Question 6: The DAEO has supervisory authority of all but three of the employees listed in Question No. 5. In 2017, TVA's OIG had three Deputy Ethics Officials in its office who are not under the direction and supervision of the DAEO. However, one of the three OIG Deputy Ethics Official retired in late 2017.
The DAEO has supervisory authority over ethics employees based in Washington, DC. The DAEO provides technical supervision over the designated ethics officials abroad. The ethics program is conducted chiefly within the main ethics office. In cooperation with the main ethics office, the designated ethics officials abroad are responsible for conducting ethics training, providing ethics advice, and reviewing OGE-450's at the overseas missions.
Some questions are not applicable to the Commission.
Questions 5 and 10 - The U.S. Dept of Housing and Urban Development runs the USICH ethics program. Therefore, these answers reflect ethics officials at HUD, not USICH.
#3 DAEO Level is PCES 1 #4 ADAEO Level is ADS 01

11. Use the following scale to rate the amount of time your agency spends to administer each item. The first six categories exclude time devoted to SGEs. Specify Other. **Q11 Table**

Non-Federal Sponsored Official Travel, Outside Boards, Combined Federal Campaign, Hatch Act.
SEC Supplemental Regulations

14. If you answered YES to 13. above, which additional resources are needed? Specify Other. **Q14 Table**

An e-tracking/filing system for all new hires/promotions/separations/training/450's reports.
IMLS ethics officials could benefit from additional SharePoint and other technical skills/training.
Training resources.
450 electronic filing system challenge retaining staff with fed ethics experience for succession

15. Describe one concrete action the head of your agency took in 2017 to support or strengthen the agency's ethics program. **Q15 Table.**

The agency head requested a review and analysis of 18 U.S.C. section (d)(1)(B) to ensure the agency's compliance with that provision in light of the active engagement of agency employees with the ABA Administrative Law & Regulatory Practice Section.
He always directly refers agency matters that may have any ethics implications to me and the ADAEO. We typically see this by him including us on e-mail threads that did not previously involve us, and directly asking us to weigh in on potential ethics issues.
Supported all staff and Board members' participation in Annual Ethics training.
None.
The Executive Director supports the ethics program and lets the DAEO and ADAEO run the program. He encourages at least one staff person to attend the quarterly DAEO meetings and report back to him.
For the first time in many years, in CY2017, the Access Board had multiple matters referred to agency ethics officials for investigation for possible violations of Part 2635, Standards of Ethical Conduct. The Executive Director was supportive of these ethics inquiries by permitting allocation of necessary resources (e.g., time, manpower), while also maintaining a "hands off" approach that allowed the investigations to take their respective courses based on the evidence.
After our OGE Ethics Inspection, he added a section to the our Ethics Manual that outlined our initial training procedures for new employees.
To ensure everyone received ethics training by the end of the calender year and updated the agency directive to ensure filers understand who needed to file and who needed to complete integrity filing.
Agency head personally reviewed every 278 filing.
The DAEO is the agency head. He sakes active role in all agency ethics issues and consults with the ADAEO and OGE on potential ethics issues.
All members of the Board of Governors satisfied their annual ethics training and financial disclosure requirements.
In his very first all hands with the entire Agency workforce, the Director of the CIA (DCIA), enforced the importance of an ethical culture and accountability for ethical behavior. Additionally, in his introductory remarks to all new Agency employees, the DCIA reminds all new employees that public service is a public trust.
The head of the agency, among other things, approved contract support for the ethics program. This support was used to improve records management and records disposition.
Personally engaged SGEs on ethic training
None

Chairman Giancarlo demonstrated significant support for the CFTC Ethics Program in 2017. Specifically, he recorded a video message for the mandatory live annual ethics training sessions held on October 18, 2017, which was incorporated into a training video viewed by employees unable to attend the live training session. The Chairman's message to the workforce expressed the importance of maintaining an ethical culture at the CFTC.
Required all employees to attend ethics training on the revised supplemental standards of conduct.
The agency head personally addressed the crowd at the annual ethics training to assert her commitment to government ethics.
Mandated all employees take annual ethics training and sent out an Agency-wide email communicating the requirement.
Meeting with DAEO to set agency policies and practices.
CEQ did not have an agency head in 2017, however, the agency's senior official supported the reevaluation of positions that should be financial disclosure filers.
Re-introduced the yearly Ethics Training requirement for all staff, regardless of statutory requirement
As a result of the completion of an ethics program inspection by OGE this past year, we greatly enhanced our ability to ensure initial ethics training was provided to all new employees throughout the 240 plus commissaries and distribution centers world-wide. The DeCA Office of the General Counsel created and distributed a DVD to all locations which was reviewed by OGE and contains all required initial ethics briefing materials. We also included the training on the internal agency webpage to provide an additional means of access. Additionally, DeCA GC has engaged with the OGE Desk Officer and the assistance and information provided by the Desk Officer has been very valuable for ethics issues and the ethics program.
Agency moved quickly to hire Ethics Attorney and provided Technology Platform for Annual Ethics Training.
The Director of DFAS Created and filled a dedicated agency Ethics Program Manager position for an experienced federal ethics attorney who will have primary oversight and management of the DFAS ethics program and be empowered to advance and advocate for continually innovating and improving the ethics program within DFAS.
DISA Director spoke on the values of ethics to the entire workforce during our All Hands.
Secured funding for reserve support and an additional ethics attorney billet for 2018.
Invited the DoD SOCO Director to brief all Seniors within DLA on SECDEF push to ensure ethical conduct within DoD during DLA's Senior Leader Conference.
Required all agency employees to attend annual ethics training, as opposed to only those required by regulation.
In August 2017, the DSS Director sent a memorandum to all agency personnel stating his expectation that all employees adhere to the highest ethical standards.

Emphasizing importance of Annual Ethics Training at meetings with other Senior officials.
The head of the agency takes time periodically in staff meetings to emphasize the importance of ethical conduct and provides time for group training
The Secretary of Agriculture has the DAEO present an "Ethics Moment" at his weekly USDA Sub-Cabinet leadership meetings. Additionally, to unveil the new USDA Ethics Mobile Application (the USDA Ethics App), in August of 2017, the Secretary of Agriculture issued a press release to the public as well as an internal electronic notification to all staff informing the public and all USDA employees about this new first-of-its-kind multi-media, multi-platform Ethics resource available for free to all Federal employees and any interested members of the public.
Provided resources and support for ethics programs.
Reinforced Secretary of Defense's ethics message via memorandum to all Airmen/Employees.
Issued Army-wide directives regarding timely filing of financial disclosure reports and timely completion of annual ethics training.
SECNAV encouraged Department of the Navy senior leadership to adhere to ethics principals and required them to encourage their personnel to adhere to these principals as well.
Secretary Mattis issued a Memorandum for Department of Defense Employees Subject: Ethical Standards for All Hands on August 4, 2017, wherein he clearly set forth his expectation that every member of DoD will play the "ethical midfield" to focus on "doing what is right at all times, regardless of the circumstances or whether anyone is watching."
The head of the agency did not take any concrete action in 2017 to support or strengthen the agency's ethics program.
Provided a forward to annual ethics training.
During the hiring freeze, approved the hiring of 3 attorneys to support the administration of our ethics program.
Deployed intranet with information for employees, SharePoint to collaborate with agency ethics officials, Head of components public statements, special collaboration with OGE for guidance on protests and social media CBP annual ethics training for all employees Website, Offered live and interactive training, tailored training
HUD OGC - Secretary Carson provided remarks at our annual ethics training about the importance of ethical behavior. His remarks were tweeted out by OGE as part of the Leadership In Action Initiative. OIG - We launched an on-demand "Core Values" video training series through their Integrity & Compliance Program to strengthen and sustain a culture of integrity within HUD OIG
One action the head of the Department took is to support, participate in, and ensure that all political appointees received ethics training provided by the Departmental Ethics Office.

In additional to new entrant ethics and Hatch Act briefings for new political appointees, the Secretary mandated "Common Sense Rules of the Road" briefings, addressing common errors made in the ethics, appropriations, travel, personnel and social media/technology use areas
The Secretary of State emphasized the importance of ethics during speech to Department employees on his first day.
On his second day in the office, Secretary Zinke sent an email to all DOI employees entitled "Strengthening the Department's Ethical Culture."
The Secretary recognized the Deputy Ethics Official for the Office of the Secretary with an individual Departmental award at the Agency-wide Secretary's Awards Ceremony for her work on the Presidential Transition in order to demonstrate the Department's commitment to the highest ethical standards.
For HQ: Chief of Staff sent reminder emails to public filers to attend one of four mandatory in-person training sessions only one make-up session was necessary, given Chief of Staff support. For bureaus, this varies.
Personally participated in top leadership briefing with OGC Ethics attorneys and other senior leaders. Encouraged VA-wide issuance of changes to ethics regulations during 2017.
During confirmation hearing, stated that he would follow advice of career ethics officials. Ensured that his staff coordinated with EPA Ethics in vetting all high ranking nominees/appointees.
Ensured procedure was in place for implementing notice requirements to prospective new employees and new supervisors.
Following the lifting of the 2017 federal government-wide hiring freeze, the agency head authorized hiring two staff members, expanding the Office of Ethics from 1 FTE to 3 FTEs.
Our Chairman established quarterly ethics briefings with the DAEO.
The Chairman established quarterly meetings with the DAEO.
For the sixth consecutive year, our Chairman and Commissioners made it known that they would decline all holiday gifts, even if those gifts were acceptable under the Standards of Conduct.
The FDIC Chairman addressed all FDIC staff via video message in November 2017 focused on the FDIC's strong commitment to a culture of ethical behavior.
Attended and actively participated in our first "live" annual training for covered employees conducted using a Family Feud game adaptation.
Each year, the Chairman introduces our annual ethics training, enforzing the nessessity of complying with all ethics requirements, and maintaining an ethical workplace.
The Director sends out the Ethics Office's quarterly newsletter.
Our agency head approved hiring of an attorney for our office to ensure that we would be able to provide top notch customer service on ethics matters.

The agency head's office inquired about the status of the annual ethics training and ensured that all trainees completed the training.
The agency head sent a letter to all employees supporting the Ethics program, and supporting a culture at the Agency with the highest degree of integrity and ethical behavior.
The Chairman sent an email to the agency on October 12, 2017, emphasizing the importance of the Commission's ethics program and the importance of that program in preserving the trust that the public has placed in us.
Chair Janet Yellen gave a speech highlighting the importance of ethics while accepting the 2017 Paul H. Douglas Award for Ethics in Government on 11/7/17. (OGE publicized her remarks on its Twitter account.)
After FRTIB's Executive Director received the OGE program inspection report, he took the time to call Dale Christopher to discuss it, which shows his investment of the quality of the Agency's ethics program. He wrote to all of OGC to praise the ethics program and also discussed the positive results of the program inspection with the Agency's senior executives.
None.
All GSA employees were required to receive annual agency ethics training.
Discussed ethics policies and principles with staff.
We provided additional Hatch Act and political activity guidance to all employees.
In 2017, the Agency Director prepared and distributed an "Ethics Message" to all IMLS staff that highlighted the Director's continued commitment to professionalism and high ethical standards within the IMLS workplace and within our programs and grant-making processes.
Agency head met with the ethics staff to discuss the strengths and weaknesses of the ethics program.
Announced at a staff meeting the importance of timely completing the confidential financial disclosure reports and encouraged all filers to please file their reports prior to the deadline for filing the reports.
Took online training and completed financial disclosure requirements
Great efforts have been made to be proactive in submitting required documentation and paperwork related to all OGE requirements and in working closely with OGE POC's for the Foundation.
The agency has offered the ADAEO opportunities for continuing Ethics education. The agency has also ensured that our SGEs receive constant and relevant ethics guidance, including guidance on the Hatch Act.
Reviewed process for approving travel funded by outside sources.
Mandated live (in-person or via VTC) annual ethics training for all employees
Agency wide communication to staff in support of the Ethics Program
Meetings with senior management

Including the DAEO on various senior agency-level governance councils.
Quarterly ethics presentations at Management Team meetings. Agency head continues to meet monthly with the General Counsel and DAEO.
He personally notified all SGEs of the obligation for, importance of, and need to complete annual ethics training.
The agency head has been supportive of our ethics program and our interactive training webinar.
The Chairman of the NEA has made it clear to agency ethics officials that she is committed to the agency's ethics practice and supports the work done to further it. She has encouraged agency ethics officials to communicate this sentiment to all staff during ethics trainings, advice and counseling sessions with staff, etc., She has also instructed agency ethics officials to use her own ethics inquiries to the ethics office as concrete examples so that staff understand that federal ethics rules apply to everyone and it is each employee's responsibility, no matter the level, to understand ethics parameters and reach out to agency ethics officials at any time with questions. As a result of this instruction, we include examples of the Chairman's own ethics inquiries as well as how she actively engages in the agency's ethics practice in our new employee ethics orientation and annual ethics training.
The Acting Chairman of NEH talked about the importance of ethical conduct and the NEH ethics program generally, during one of the agency's quarterly all-staff "Town-Hall" meetings.
Our Director distributed Secretary Mattis' ethics memo on playing the ethical midfield to the agency.
Endorsed training initiatives to include extending annual training to all supervisors and managers, not just those who are not financial disclosure filers.
None
Memo to all employees emphasizing the importance of ethics and outlining supervisor's responsibilities to the ethics program.
Our Director recorded an introduction video to the annual ethics training emphasizing the importance of ethical behavior.
Ethics Counsel detail increased from 6 months to 1 year for continuity.
Updated and published agency-wide core values, which include integrity and transparency
Internal review of ethics program
The agency head discussed with the DAEO and other ethics staff various individual matters throughout the year and the clarification of these issues resulted in program improvements. For example, she clarified that as a general matter for attendance at "widely attended gatherings" which require her approval, she would not authorize attendance at certain events in light of the appearance of ethics issues.
Shared and discussed OGE letter of Oct 5, 2017 with Board members and staff at Board meeting.
The Chairman issued a revised agency Ethics Directive in 2017.

The head of the agency authorized the implementation of an ethics corner in the OA monthly newsletter.
Focused the annual ethics training on ethical culture and provided a video message addressing the vital importance of ethics in public service.
Director Mulvaney, through his Chief of Staff, directed political leadership and all agency employees to consult with the Ethics Team concerning gift rule and Hatch Act compliance, especially in connection with outside events.
Thanked ethics officials in an all staff meeting.
We now have contracted with a company to provide yearly internet training on ethics.
She requested increased involvement in critical aspects of political appointees' transition out of government as a result of Presidential transition
The Director, the Acting Director, other political appointees and managers/supervisors regularly discussed the importance of ethics training, filing, consulting, and ethical agency actions/decisions at full staff meetings and numerous smaller group meetings. This leadership group attended annual ethics training and ensured that the rest of the staff did, as well.
The Special Counsel required that all OSC employees complete annual ethics training.
As the due dates approached, names of those who were required to complete the annual ethics training and/or OGE 278 but had not done so were provided to the agency head. The agency head then contacted these individuals and encourage them to complete the requirement so that further action was not taken.
The head of the agency promoted annual ethics training via an agency-wide email. He also disseminated a SECDEF memo on ethics and made it the subject for a monthly SES training session.
Meets regularly with the DAEO and expresses strong support for the ethics program.
Mandated frequent in-person ethics training at all-staff meetings.
The DAEO served as Acting Head of the agency for over seven months during 2017. He continued to support the ethics program while also carrying out the functions of President & CEO.
The acting head of the agency actively sought out ethics advice and encouraged employees to report issues to the Inspector General.
The Director discussed the importance of the ethics program and ethics training at a meeting of senior leaders and he actively participated in ethics training during the year.
Amended supplemental standards and ethics rules related to financial conflicts of interests, gifts, prior approval for outside employment, and post-employment.
The Trust CEO periodically included Trust Ethics Tips in her weekly "All Employees" email.
The agency head sets the example of ethics compliance by adhering to ethics rules and guidance.

Both Board members had their entire staff attend annual ethics training, even though such training is not required for each staff member.
Met with our office, included DAEO in all senior staff meetings, Supported programmatic goal of timely filing and certification of FD reports
He sent an email to all employees expressing the importance of ethical conduct, and adherence to the 14 Principles of Ethical Conduct.
One employee detailed to Ethics Program.
In 2017 the Acting Commissioner implemented targeted ethics training for Executive Officers and participants in the Candidate Development Program for Senior Executive Service highlighting the significance of ethics for leaders.
The head of our agency sent an email out to all SIGAR staff applauding SIGAR's ethics program and reiterating the importance of the program. This was sparked by an email by the ethics program reminding staff about their obligations as government employees under the Hatch Act.
The Chairman spoke to employees at the 2017 annual ethics training, strongly supporting ethical standards at the Board and the efforts of the ADAEO to administer the program.
Recognized the importance of TVA's Ethics Program during the annual presentation of the agency's Excellence in Service Awards. TVA's Alternate DAEO received the Excellence in Service Award for Integrity in February 2017.
In conjunction with annual training, the CIGIE Chairperson Michael Horowitz issued a memorandum supporting the CIGIE ethics program to all CIGIE staff members. Chairperson Horowitz reaffirmed that continuing to maintain the highest ethical standards every day is essential to retaining the public's trust. He reminded the CIGIE staff that they are the eyes and ears that protect against a loss of public confidence in CIGIE, the Inspector General community, and the federal government.
The Acting Director appointed the new DAEO immediately upon the position's vacancy, ensuring continuity in the agency's ethics program.
Required all agency employees to receive annual ethics training, not just Financial Disclosure Filers, and contributed content/media into the training materials.
The Administrator mentioned the importance of ethics during his all hands introductory meeting with Agency staff. The Administrator vocally supported implementation of our web based ethics inquiry tracking system (Service Now).
None taken
Discussion of topic in Team meetings.
Secretary Carson provided remarks at the annual ethics training about the importance of ethical behavior. His remarks were tweeted out by OGE as part of the Leadership in Action Initiative.

The Chairman included compliance with financial disclosure reporting in internal control and risk analysis, and discussed with the DAEO and other senior executives.
The Postmaster General required an ethics presentation be given at leadership meetings at all of our seven areas.
Discussed the ethics review process -review occurred at end of 2016 and we discussed the report in 2017)
The DAEO provides general Ethics training and updates concerning OGE's legal advisories to VEF staff.
The Chief of Staff and the White House Counsel have repeatedly announced, on behalf of the President, the importance of the ethics and compliance program. The Chief of Staff has also announced at staff meetings the importance of adhering to all legal and ethical requirements. The Chief of Staff has repeatedly advised all staff that public filings must be submitted on time, that all staff must attend ethics training and must consult with ethics counsel if in doubt about any potential ethics issue.

17. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2017? **Q17 Table**

Professional Development (Specify Other)

Emails and teleconferences with OGE on agency-specific issues and questions.
External training/conferences
Hiring of paralegal to support ethics program - ensuring paralegal received training.
Staff Training and Management Assignments
Department of Defense Standards of Conduct Ethics Training at The Judge Advocate General's School.
Monthly SOCO Coordinating Group meetings IEC Meetings
Trainings, IEC meetings and Deputy Ethics Counselor meetings.
Provided by OGE provided by agency, provided by other agency.
FDOnline
Meetings with DEO and other DOJ ethics officials to cross-train
Periodic conference calls and group discussions
EPA Ethics provided mentoring and on-the-job training for new detailees and employees.
Interagency Ethics Council
Interagency meetings and informal training provided by other federal agencies
Virtual ethics sessions in which presenters from other agencies (including OGE) provided training sessions.

- Attended IEC and Quarterly DAEO meetings.
SOPs
Allowing the ethics staff to create and design new ethics training in response to employee knowledge
Use of OGE and other agency online training materials

Programmatic Tools (Specify Other)

Three meetings between the DAEO, ADAEO and the head of the agency.
The Office of Ethics created six innovative Strategic Action Teams enhancing staff-cross training.
Quick reference guides, information papers, on-line training modules.
Internal websites, OGC and OGE materials, electronic filing systems.
Shared email accounts for ethics officials to promote awareness,
Developed new Department Notices, increased notification of deadlines
Ethics advise database
Monthly meetings of all DOT ethics officials to share news, knowledge and discuss common issues
Made USDA Ethics app available to all EPA mobile devices.
Printed-out file for each subject matter.
Interagency Ethics Council (IEC)
the use of templates
Continued work on standard operating procedures
Boilerplate language and standard guidance memos for common ethics questions.
quarterly Ethics Dispatches
Written Notices
VEF works closely with its OGE Desk Officer who will provide added training to a new DAEO/ADAEO.

19. What did you assess? Specify Other. **Q19 Table**

See Additional Comment For Part 5.
During the completion of the OGE ethics program inspection, this office updated training and SOPs.

Customer service surveys requests are on all emails sent by Ethics staff and responses are reviewed.
U.S. Army Corps of Engineers Division Counsel assistance visits to assess ethics programs.
OIG - conducted an assessment on the ethical environment of the organization and employee knowledge
OGE conducted a program review of DEO in 2017. Assessment of new OGE Final Rules.
Personnel Resources
quality of training materials
Response in additional comments section for part 5.
OMB Cir A123 Control Audit
Awareness of ethics through supplemental questions to the Federal Employee Viewpoint Survey.
compliance with Agency mandatory training requirement for Standards of Conduct/Ethics training
The General Counsel assessed the agency's Ethics Directive, which led to issuance of an update.
File management/record disposal
We discussed our annual training and what we could do to improve an already popular training session

22. Please list any significant accomplishments your ethics program achieved in 2017. **Q22**

Table

All financial disclosures (public and confidential) were filed timely in CY 2017.
Went through an OGE ethics inspection with limited recommendations.
Provided ethics training not only to Federal direct-hire employees and Board member PAS-SGEs, but also to contract employees working at USADF's HQ in DC, locally-hired personal services contractors working at USADF's Field Offices in Sub-Saharan Africa, and to local employees of USADF's partner organizations in Africa which have been awarded cooperative agreements with USADF.
Adopted Workforce Transformation Tracking System (WTTS) to ensure initial ethics training to all new employees via automated support for onboarding process.
All public and confidential disclosures were completed on time with no extensions given. All reviews of annual financial disclosures were completed within two weeks of receipt.
In CY2017, the Access Board had 100% compliance in its financial disclosure program. That is, all public and confidential filers submitted their respective annual financial disclosure reports on time, and each report was reviewed by agency ethics officials within the applicable regulatory time frame.
Inclusion of initial ethics training into our USARC ethics manual.

Training for AFRH-W and AFRH-G have been completed before the deadline of Dec 31.
Confidential financial disclosure program achieved a 99% filing compliance rate. - Public financial disclosure program achieved a 100% annual training rate.
As noted, effective January 2017, the Agency requires all officers graded GS-15 and below who hold a Contracting Officer's Technical Representative (COTR) certification to file a confidential financial disclosure report. This is a permanent process change that will be implemented each year and requires all employees with a COTR certification, whether or not they are currently performing COTR, Assistant COTR, or Government Task Manager duties to file.
OGE conducted an inspection of the CSB's program during 2017. As indicated by the report, the CSB's program met all requirements but one. OGE issued one recommendation to address the issue. In a follow up, OGE closed the one recommendation.
All reports were received in a timely manner
The DAEO would be able to answer this when she returns from leave in April, 2018.
CFTC Ethics continued to strengthen partnering relationships with CFTC Human Resources. This year, we collaborated to improve notification of accessions, separations, and promotions. HR continues to work closely with CFTC Ethics to ensure that notices of ethical obligations in written offers of employment are being issued. Additionally, HR implemented an on-boarding process that incorporates scheduling one hour of new entrant ethics training. CFTC Ethics continues to improve program administration. Specifically, we implemented the use of SharePoint as a records management system to maintain records of advice and counsel.
We finalized, published, and implemented revisions to our supplemental standards of conduct. We published an updated prohibited holdings list and assisted employees to come into compliance with it. We provided live training to 86% of new employees, and to 92% of our confidential financial disclosure filers. We provided ethics training to 410 employees who are not filers required to receive annual training. We transitioned our vendor provider for FDonline from NTIS/Dept. of Commerce, to HR Worx.
We provided ethics review and approval (including drafting ethics agreements) for 2 PAS nominees.
All of our Political Appointees received over 2 hours of ethics training and we had a 95% training rate.
On time submission of financial disclosures. Participation of staff in required ethics training
CEQ successfully operated its ethics program with limited resources and better integrated detailees into our program.
provided training to all employees regardless of statutory requirement. Developed internal Standard Operating Procedures for the financial disclosure programs.
Completion of an OGE ethics program inspection.
Introduction of Podcasts for annual ethics training in 2017. Introduced new Outside Activity Questionnaire to capture consistent proposed outside activities.

100% timely receipt and review of all Public and Confidential Financial Disclosure Reports, 100% completion of required ethics training, significant ad hoc ethics training for other agency stakeholders.
Monthly ethics articles are sent out to the entire workforce the Director discussed the value of ethics at an Agency's All Hands timely review of 1600+ OGE-450 reports. Increased in-person ethics training for senior leaders and supervisors and increased recruiting and training for FDM POCs
Established ethics training as part of the mandatory ethics course for supervisors, instituted new procedures to ensure written determination for WAG's no criminal ethical violations requiring DOJ referrals timely issuance of PGE opinions, etc.
Updated Annual Ethics Training. Provided specialized training to supervisors, IT personnel and acquisition personnel throughout the Agency.
Appointed a new DAEO and ADAEO to administer the ethics program.
The DSS Office of General Counsel provided 2-hour in-person ethics briefings for all new agency employees.
Transitioning OGE 278 Filers from FDM to Integrity.
Full compliance with confidential disclosure filings.
The USDA Office of Ethics: 1) Created a brand new, first-of-its-kind, multi-media, multi-platform, Ethics Mobile Application (USDA Ethics App)available for free on all smart phones to all Federal employees and members of the public, 2) DAEO personally presented "Ethics Moments" and "Ethics One-Pagers" at all Sub-Cabinet meetings and Agency Heads meetings, 3) Ensured that all political appointees in Washington, D.C. received Ethics training on their first day of Federal service, 4) Using existing resources, created an Ethics Video Studio which cost-effectively produced 9 new videos which have been placed on USDA's official YouTube page (this is in addition the 10 previous Ethics videos created in 2016), 5) Provided over 100 hours of live training to USDA employees via in-person and webinar trainings, 6) Created a brand new long-distance ethics training module fully compliant with Section 2638 requirements, and 7)Organized and led a no-cost Ethics for USDA Scientists Summit.
Successful Presidential appointees transition, providing guidance and training to Commerce employees, managing Integrity, collecting and reviewing 9,793 paper confidential financial disclosure reports
DoD Spirit of Service Award for USAF Public Financial Disclosure Manager OGE Recognition for Post-Government Employment Program robust implementation of integrity--100% in HQ USAF
Published a memorandum jointly signed by the Acting General Counsel and Acting Assistant Secretary for Manpower and Reserve Affairs outlining implementation of the new provisions of title 5, C.F.R. section 2638.
Senior civilian and military leaders continue to emphasize the importance of ethics. Reduced the backlog of uncertified public financial disclosure reports.

<p>DoD presented its first ever Advanced Ethics Counselor's Course at the Army Judge Advocate General School with a keynote address by Deputy Secretary Shanahan. -Established working relationships with incoming Presidential appointees, which have fostered a constant drumbeat of ethics dialogue through ethics messaging and training, as well as regular ethics updates with the Secretary. -Joint DASD(CPP) and SOCO Director Memo to personnel offices across DoD setting forth HR responsibilities under 5 CFR §2638.301, et seq. and providing model offer letter and confirmatory language. -Continuously improving emphasis on values based leader led ethics training throughout the Department.</p>
<p>To curtail the effect of being short-staffed, the Ethics Division has undertaken several efforts to improve its efficiency & effectiveness which included streamlining the intake, assignment, & processing of employee outside activity requests, & requests for the acceptance of personal gifts under the widely attended gathering exception. The Division has also taken a team approach to the review & vetting of nominees to senior level positions of the Department, which is critical given the increase in new reporting about unique and complex conflict of interest issues associated with the new agency leadership. In addition, to aid the Division's succession planning for the anticipated retirement of two senior level Division employees, the Division has developed standard operating procedures for various aspects of the Division's work, such as outside activities, film screenings at the Department, and administrative tracking for report certification.</p>
<p>Successful transition of personnel to and from Administrations.</p>
<p>Provided ethics guidance and services to a large number of outgoing and incoming political appointees in support of the Presidential transition. That included conducting live ethics training, counseling, and review of public financial disclosure reports for non-career personnel. Continued to expand and improve ethics training for all employees, including the use of technology to improve the quality of our offerings. Improved processes and tracking methods for financial disclosure programs. Developed new ethics resource materials for employees as well as ethics practitioners within the Department.</p>
<p>Continued process improvement. Presidential Transition. Launched HRBE for HQ personnel. Program updates implementation. Undergone OIG audit of disclosure program. Increase in tailored and live training, as well as training of non-disclosure filers.</p>
<p>HUD OGC - As part of the transition, our team provided bi-weekly initial ethics orientation for incoming political appointees to be trained within the first pay period. We provided ethics tips of the month that were posted on our intranet and included within our department newsletters. We also completed a mandatory ethics training. OIG - Issued monthly OLC Informer Newsletter, revamped the intranet webpage, transferred financial disclosure report filing system data to the Cloud, and continued the Integrity & Compliance Program</p>
<p>Successful Presidential transition, enhanced ethics training programs, smooth transitions of ethics officials, the Antitrust Division established an annual award for Ethics and Integrity to honor two prior ethics officials, recognizing an employee who demonstrates the highest standards for ethics and integrity. DEA developed an Ethics Pocket Guide for all employees, and enhanced post-government employment outreach. Senior personnel meetings demonstrated the importance of ethics matters. EOIR enhanced its ethics program, including speaking engagement policy and guidance. E-filing for confidential financial disclosure launched in ATF.</p>

<p>Provided post employment briefings to all outgoing Obama administration appointees -They all actually left</p>
<p>Completed review of all annual PAS reports and sent to OGE by November 2017. Improved review timeline for Nominee Reports. Met the demands of the Presidential Transition</p>
<p>1) Some bureaus provide live training to every employee and Post Employment summaries and counseling to all employees. 2) Training provided to 450 filers on "how to properly fill out the form."</p>
<p>1) Presidential Transition - Ethics officials guided employees through the process and worked to build relationships with incoming appointees 2)Ethics Tracker Tool - Office of the Secretary Ethics office implemented a Sharepoint-based tool that will assist in tracking and archiving advice given and tracking compliance with financial disclosure and training.</p>
<p>These vary by bureau, but the most significant are: *Managing the transition of 98 outgoing political appointees and 15 other departing officials and 75 incoming appointees including 11 PAS officials. *Improving OGE 450 designation, filing, and review processes by leveraging technology and enhancing coordination with internal agency personnel. *Achieving 100% compliance with receipt of required OGE 450 filings. *Achieving nearly 100% compliance for ethics training for covered employees, including in-person briefings for public filers, political appointees, and other employees, both covered and non-covered, across many Treasury bureaus. *Development of in-person and interactive online ethics training. *Providing in-person post-employment briefings for most employees, including all OGE 278 filers. *Improving programmatic procedures, including delivery of advice, training, implementation of 5 CFR Part 2638 regs, filing, etc.</p>
<p>Closed out the OGE program review that started in 2013. ALL issues resolved. Continued internal audit of CFD program. Collaboration with OGE and ABA providing mandatory ethics training for all OGC attorneys. Special face-to-face ethics training for all new SES appointees. Ethics training for all employees of VA Office of Public Affairs. OGC-wide ethics risk assessment. Issued VA-wide guidance on update to gift rules. Chief Counsel offices assist in rolling out ethics guidance to facilities and employees.</p>
<p>1) Successfully transitioned more than 70 political appointees out of EPA in January 2017, and successfully transitioned in more than 80 new political and administratively determined appointees. 2) At times, functioning with as few as 1.5 FTE (due to an unexpected departure, retirement and maternity leave of key staff), EPA Ethics nevertheless implemented three OGE regulations, a new Executive Order, a new CFC regulation, and still provided EPA and its ethics officials with excellent customer service.</p>
<p>Successfully coordinated with Office of the Chief Human Capital Officer implementation of notices presented to prospective new employees and new supervisors.</p>
<p>Implemented a monthly ethics newsletter and monthly Brown Bag Lunch Series. Cleared 6 PAS nominees. 100% compliance with mandatory live annual ethics training for ALL employees.</p>
<p>DEO Completed OGE intensive training and All filers successfully filed on time in Integrity.</p>
<p>All filers timely filed on Integrity</p>

<p>Successfully converted all 278 filers to using Integrity e-filing application. Transitioning to using internal electronic tracking system to record employee ethics training compliance.</p>
<p>Launched an Ethics SharePoint site. The site provides an automated assignment system for ethics inquiries, central repository for guidance issued and post-employment counseling records among other things. Developed new Standard Operating Procedures on post employment out processing, retention of guidance on the SharePoint site and management of the ethics shared mailbox.</p>
<p>Successfully conducted first "live" annual ethics training for covered employees using a creative and engaging Family Feud game adaptation.</p>
<p>Our significant accomplishments include annual ethics training, ethics training for new employees, timely submission and timely review of financial disclosure forms, timely response to ethics inquires, and tracking of ethics matters.</p>
<p>All employees received annual ethics training by 12/31/17 Annual ethics training included videos featuring children of FHFA employees Annual ethics training incorporated voting w/ clickers allowing data to be downloaded and analyzed.</p>
<p>We successfully handled the Presidential transition by developing entrance and exit materials for Presidential appointees. We also trained a new staff members with no experience in ethics matters, making her an invaluable member of the team.</p>
<p>Implemented the initial ethics training for all new employees. - Implemented the ethics notice requirement in employment offer letters. - Implemented the new supervisors ethics notice requirement.</p>
<p>Letter of Acting Director to all employees supporting the ethics program.</p>
<p>The Commission increased the number of public filers using the Integrity system for financial disclosure, leaving only six who have not transitioned to it yet. The Commission also successfully implemented the new policies required under new OGE regulations, as well as took steps to come into compliance with OGE's recommendations made as part of its audit of the Commission's ethics program.</p>
<p>We rolled out new digital ethics reminder slides displayed on hallway monitors throughout the agency -We assisted OGE and the White House in clearing three Presidential nominations -We reviewed almost 1200 financial disclosure forms, provided in-person ethics training to over 200 new employees, and provided in-person post-employment briefings to almost 50 departing senior employees -We made a presentation before the Interagency Ethics Council -We conducted a significant internal review of our confidential financial disclosure criteria and designation process</p>
<p>In 2017, OGC successfully completed an OGE program inspection with no recommendations. OGC also successfully administered annual ethics training to all Agency employees and new employee ethics training within 90 days of each new employee's arrival (in most cases within 30 days).</p>
<p>The Ethics Team had a key role on the FTC's Transition Team, ensuring that all members of the landing team were briefed on federal ethics concerns. We advised new hires on the implications of the new Trump Ethics Pledge as appropriate. The Ethics Team processed an unusually high number of nominee reports, ensuring all were pre-cleared in a timely manner. We also launched a new live training program for senior</p>

<p>staff-Ethics Jeopardy. The new training was a hit, emphasizing that understanding how the rules work in practice is paramount since even inadvertent ethics mistakes might place careers or the FTC's mission in jeopardy. We also provided live training to GS 14s and GS15s throughout the year. For the first time, we expanded our live annual training classes to include other employees at GS level 13 and below who have been designated by managers for annual ethics training due to the nature of their official duties and/or independence. We also provided a one-time, online training for</p>
<p>Required all employees to receive annual ethics training. Provided guidance and specific ethics training to incoming appointees. Provided ethics notice to all supervisors, not just new supervisors as required by regulation and post employment guidance to departing employees.</p>
<p>Given our personnel and budgetary constraints, our most significant accomplishment is continuing to function effectively.</p>
<p>In May 2017 IMLS successfully completed an OGE inspection of its ethics program. In December 2017, OGE notified IMLS of the successful completion of its 2017 financial disclosure filing cycle.</p>
<p>All IAF FTEs required to file financial disclosure reports did so in a timely manner. All but one IAF SGE completed annual ethics training in a timely manner.</p>
<p>Ethics training of 100% of financial disclosure filers and new personnel, within time requirements established a system to track new employees and their initial ethics training.</p>
<p>Completed an ethics program review in 2017</p>
<p>No significant accomplishments in 2017.</p>
<p>JUSFC researched and provided information to our Commissioners about the Hatch Act.</p>
<p>Improved compliance for timely filing of financial disclosure reports by SGEs.</p>
<p>100% on-time submission and review of public and confidential financial disclosure reports 100% on-time initial and annual ethics training for all agency employees.</p>
<p>Special Hatch Act stand up briefing and EthicsGram: communication to all employees, February 2017. Throughout the year we provided relevant ethics guidance reminders to all MCC staff on various topics, including political activities, fundraising, and holiday gift guidance.</p>
<p>Timely submission of 450s for SGEs</p>
<p>Provided new employee ethics training to most initial members of NASA's new non-career team on the first business day following the President's inauguration. Completed OGE Ethics Program Inspection confirming compliance and responsiveness to OGE recommendations. Performed ethics review to achieve establishment of three new science advisory committees. ADAEO's article "Ethics and public integrity in space exploration" published in Acta Astronautica, the journal of the International Academy of Astronautics.</p>
<p>Program had a program review conducted by OGE. Six facilities received in-person training from DAEO.</p>

<p>1. We completed our second annual live/interactive webinar training, with over 700 participants at the live session. We got very positive reviews from filers. 2. We worked with Human Resources to develop and implement new notices/procedures for new OGE requirements for employment offer letters and to notices to new supervisors. 3. We continue to work with procurement staff to make them aware of potential conflicts.</p>
<p>In 2017, the agency had a successful second year using Integrity for all public filers. The agency also on-boarded a number of political appointees and career positions that required comprehensive ethics training and financial disclosure review (both 450 and 278).</p>
<p>During 2017, NEH completed annual ethics training (web-based interactive) for all NEH employees, not only those required to file financial disclosure reports. In 2017 NEH also continued sending monthly e-mails on various ethics topics to all agency staff.</p>
<p>Our program greatly increased the timeliness of our OGE450 reviews and met the 60 day time line on nearly every of our OGE450 filers. This was a known problem area before and was a focus point for action.</p>
<p>The NLRB Ethics Office continued to provide timely guidance on interesting topics to Agency employees through the Agency newsletter, Job Aids, and Ethics Advisory memos and webcasts. These topics included Social Media, Hatch Act, Gifts, Speaking Engagements, Conflicts of Interest, and Appearance Concerns. All documents were distributed to headquarters and field offices via email and posted to our Ethics webpage. These documents were developed to educate Agency employees about potential ethical pitfalls that they may face as an employee of the NLRB. Our efforts in this area have been well received by NLRB leadership and by the rank-and-file employees. Moreover, employees have expressed their appreciation that we have provided ethics information in a way that is quick to read and easy to understand. We also to require all managers and supervisors to complete annual ethics training, not just financial disclosure filers.</p>
<p>Ethics Program Inspection by OGE</p>
<p>1. 100% annual ethics training compliance 2. Successful implementation of new IET requirements and 100% completion of IET within 90 days by incoming employees. 3. 945 financial disclosures were filed with the NSF GC's office (OIG reviews their 450s). 940 were certified within 60 days of receipt. The delay with the five others was due to significant follow-up with either the filer with regard to technical requirements or the supervisor on COI issues. 4. Timely implementation of new 5 CFR 2638 requirements.</p>
<p>Successful OGE Inspection Report.</p>
<p>100% annual ethics training compliance</p>
<p>Live annual ethics training for all employees</p>
<p>First every annual training completed by everyone</p>

<p>The NRC ethics program processed and pre-cleared four PAS nominees in 2017 in a span of three months. This represented a significant accomplishment because the NRC, by statutory design, typically only has one PAS nomination each calendar year. The NRC ethics program also engaged in significant outreach this year informing NRC staff of the changes to CFC rules surrounding fundraising events in 2017. The ethics team received a significant number of questions from staff seeking ethics approval of events and ensuring compliance with the new rule prohibiting the collecting of funds at such events. This demonstrated an awareness of the rule change and the effectiveness of the outreach informing employees of this significant change in CFC practice.</p>
<p>Seamless provision of ethics services during transition from previous DAEO who left the agency.</p>
<p>We further expanded the use of Integrity by our 278 filers. We offered a live annual ethics training session and made the recording available. We revised our Ethics Directive.</p>
<p>Implemented procedures for notice of ethical obligation in written offers of employment for new employees and ethics notice to new supervisors for OA. Also, coordinated with the EOP components and OA Human Resources department a suggested process for the components to make sure their new employees and supervisors received the ethics notices. Also, developed new annual ethics training for OA employees and conducted in-person annual ethics training for OA staff.</p>
<p>Updated Education and Training SOPs to comply with new 2638 requirements. Applied behavioral insights to the development and delivery of ethics training. All OGE employees received one hour of live, in-person annual training.</p>
<p>We developed the OMB Ethics Portal which includes an electronic filing system for the 450 program, an event clearance application, and self-certification for annual ethics training. The event clearance application is not new, but was synchronized to this new platform and is undergoing upgrades. Employees access the OMB Ethics Portal through MAX-single sign on from their OMB desk top, and it is personalized to the employee, specifically noting whether a 450 is due, what events are in the queue, and if they have completed training. In October 2017, we launched the electronic 450 system through a phased roll-out that will conclude by Spring of 2018.</p>
<p>Successfully kept agency out of trouble.</p>
<p>Successfully supported agency and personnel activity associated with Presidential transition.</p>
<p>Assisted with the transition between Administrations and the turnover in staff as a result, requiring out-briefing, training, and processing ethics forms.</p>
<p>(1) Provided timely and accurate advice to management and staff. (2) Required mandatory annual ethics training for all OSC employees. (3) Issued revised directive to comply with new ethics program regulations. (4) Successful completion of required public and confidential financial disclosure reports. (5) Developing online new employee ethics orientation. (6) Increased our security with the use of PIV cards on Integrity. (7) Participated in OGE onsite inspection.</p>
<p>Brought on experienced ethics paralegal on a detail. Successfully began sending monthly reminders to senior officers, via the electronic filing system, about STOCK Act requirements. Successfully began notifying required OGE450 and OGE278 filers via the electronic filing system. Successfully began tracking annual</p>

ethics training via the electronic filing system. Successfully implemented new final rule (5 CFR 2638). Successfully began sending quarterly emails to newly appointed supervisors. Accomplished 100% on-time training for all OGE 278 and OGE 450 filers. Successfully completed onsite program review by OGE with minimal recommendations.
Certified or initially reviewed 98% of OGE Form 450 reports within OGE 60 day standard. Published 4 Standard Operating Procedures to address new requirements established by 2017 CFR changes. Publish ethics articles in the IG News as a training mechanism.
Timely certification of all new Administration personnel financial disclosure reports within OVP. Built the ethics program from the ground up.
Transition ethics assistance to political appointees who joined the agency. Provided annual ethics training online.
Tracked the ethics training of overseas personal services contractors. - Tracked all 278, 450, and new entrant ethics training. - Tracked all 278 and 450 reports data in tracking spreadsheet. - Conducted live political appointee ethics briefings including the ethics pledge and 278s. - Conducted ethics training for new supervisors. - Conducted live ethics training to staff serving in Acting positions during the Transition. - Processed the nominee 278 and ethics agreement for the agency director nominee. - Conducted live ethics training to new overseas staff at Overseas Staff Training in DC. - Provided individual exit briefings covering post-employment in person or via email.
1. 92% of annual ethics in-person training completed on time (347 of 378 employees) 2. 100% of new employees timely trained 3. Scheduled training to be provided by the Office of Special Counsel on the Hatch Act 4. Specialized ethics training for Senior Level staff
Amended supplemental standards and ethics rules related to financial conflicts of interests, gifts, prior approval for outside employment, and post-employment. In-person ethics training for all PRC employees (newly hired and annual). Distribute quarterly ethics dispatch for continuing education.
The Trust converted to the Integrity system for 278 filers and saw an increase in the timeliness of reports filed and reviewed.
Our program successfully out-processed Board members and agency senior staff.
We completely revised ethics orientation for new employees, using an interactive system to provide the training.
- Engaged in full blown audits of all 278s - i.e, comparing them to brokerage statements filed by employees. - Met training goals of 100%. - Developed new interactive game style training for the 278 filers that was effective and entertaining. Used a sophisticated delivery system (i.e., the clicker technology), that attendees found to be fun and interesting.
Began using Integrity for all 278 filers.
Passed an OGE Program Review

<p>We provided bi-annual training to over 1300 supervisors and managers nationwide in SSA's Office of Operations on Conflicts of Interest and Misuse of Position.</p>
<p>We had a very positive Annual training of all SIGAR staff, as well as timely filings of our public and financial disclosure reports.</p>
<p>Fully integrated use of Integrity.gov for all public filers.</p>
<p>Developed and implemented ethics guidelines for charity events based on the new Combined Federal Campaign requirements. Held first meeting of TVA's re-established Ethics Council. Successfully moved four nominees for the TVA Board through the pre-clearance process Streamlined the number of OGE Form 450 Confidential Financial Disclosure Report filers.</p>
<p>After rolling out an expanded confidential financial disclosure program in CY 2016, the CY 2017 filing season reflected an increased understanding by agency staff of the OGE 450 and the need for certain information. The number of questions and errors on initial review was significantly lower in CY 2017 than CY 2016. Additionally, we continued to improve and refine the implementation of scenario based training.</p>
<p>Based on OGE's inspection of USTDA's ethics program, USTDA was found to be fully compliant in every element of its ethics program.</p>
<p>97% Annual Ethics training for 278/450 filers, the missing 3% due to sabbatical status or retiring within 30 days of December 31, 2017, in which case the training requirement was waived. Also trained 713 Federal Civilian employees, military faculty/staff, and contractors in addition to 278/450 filers, for a total of 893 trained.</p>
<p>Underwent an OGE Program Inspection and received scores ranging from 93%-100%. Provided training on filing the OGE-450 and OGE-278's. Developed an electronic storage method for our OGE-450 forms. Developed a new, much improved, ethics training tracking system. Initiated Service Now ethics inquiry & resolution tracking system. Fully transitioned from paper filing to electronic filing through Integrity for all of our OGE-278's. In addition to providing live ethics training to our financial disclosure filers, we provided ethics training to thousands of our non-filing employees. We gave an Ethics Award (including monetary prize) to one employee who made exceptional contributions to the promotion of ethical standards and conduct in the agency.</p>
<p>As part of the transition, our team provided bi-weekly initial ethics orientation for incoming political appointees to be trained within the first pay period. We provided ethics tips of the month that were posted on our intranet and included within our department newsletters. We also completed a mandatory ethics training.</p>
<p>The Commission recruited a new ADAEO to replace the prior ADAEO, who retired after managing the Commission's ethics program for more than 30 years. In order to insure a smooth transition, the Commission arranged for a month long mentorship so the prior ADAEO could transfer institutional knowledge to the new ADAEO. The Commission also expanded and enhanced its review of financial interests held by contracting officers.</p>

Updates to FDS. - Continued implementation of "Your Smart Business Moments" initiatives. - Conducted several live training sessions. - Created interactive, electronic Annual Ethics Training and Hatch Act Training.
We had a compliant program for public and confidential filers.
Submitted all training requirements and filings on time.
The White House ethics team reviewed and certified what are likely the most complex financial disclosures in the history of any presidential administration. Ethics officials routinely deal with unusually complex ethics issues due to the extensive financial holdings and diverse professional backgrounds of current WH officials.

21. Does your agency provide ethics program services for any board, commission, or agency that is independent of your agency? If yes, please provide the names of the boards and commissions. **Q21 Table**

Pretrial Services Agency for the District of Columbia
Department of Defense Threat Reduction Advisory Committee (TRAC)
The Federal Crop Insurance Corporation.
Regional Fishery Management Councils, RESTORE Council
National Council on Disabilities (NCD) National Assessment Governing Board (NAGB)
USICH
DOJ/OIG: The Council of the Inspectors General on Integrity and Efficiency (CIGIE)
OPIC
See comment below for additional information
Farm Credit System Insurance Corporation
International Boundary Commission
Public Interest Declassification Board.
President's Committee on the Arts and the Humanities (PCAH)until 9/30/2017) - charter not renewed.
OA provides initial ethics training for Office of Management and Budget.
President's Commission on Combating Drug Addiction and the Opioid Crisis
Social Security Advisory Board and the Old-Age, Survivor's and Disability Insurance Trust
The ADAEO provides a bi-annual ethics training for agency's FACA committees (representatives only)

OPIC Board - Conflicts of Interest check ACFVA, BIFAD, Global Development Council - ethics training
Various boards, commissions, offices and components within the EOP.

23. Please list the greatest challenges facing your ethics program in the short term (next 1-3 years). **Q23 Table**

The ADAEO is retiring from government in 2018. A replacement will need to be identified and trained.
As always, limited staffing and budget for the agency overall means that ethics duties are one of many carried out by two persons. See previous questionnaire.
Keeping up to date on changes in ethics laws, regulations and guidelines and communicating them, as appropriate, to management and staff.
Providing annual training. We have 12 staff and do in-house annual ethics training. Scheduling it can be difficult. It would be nice to have some sort of online training but we do not have the staff or budget to develop one. This comment refers to our response for question 14.
Remaining vigilant for potential ethics/conflicts issues posed by outside activities of public Board members (SGEs). Ensuring that agency staff members maintain a high degree of sensitivity for potential ethics/conflicts issues so that they proactively seek ethics counsel, when needed.
The possible move of the General Counsel Office from the agency.
Assuring compliance and meeting deadlines in ever-increasing reporting requirements in conjunction with ethics program directives and initiatives.
Increasing the visibility of agency senior management's program support. - Maintaining funding needed to fully support the program.
(1) The Agency's ethics program continues to meet the challenge of identifying new entrants Form 450 filers (2) Providing legal guidance on post-employment restrictions as more employees retire.
1. CSB will no longer have temporary contractor support. 2. Turnover of PAS filers in two years.
The agency's budget no longer allows for an ethics official. Our ethics program is severely understaffed and it is difficult to provide advice in a timely manner. We also have problems with SGEs. We have difficulties getting the non-FACA SGEs to file their public financial disclosure forms, and with the FACA SGEs completing training and filing out conflict of interest forms.
In 2017, CFTC Ethics completed a first draft of revised supplemental ethics regulations. CFTC continues to work within the CFTC to ensure that we have adequately addressed ethical issues associated with the CFTC's expanding mission. CFTC Ethics anticipates moving forward with OGE review and notice and comment within the next year. Additionally, CFTC Ethics continues to examine financial disclosure administration to evaluate the filing status of Public Financial Disclosure (OGE Form 278e), Confidential

Financial Disclosure (OGE Form 450), and Certification of Compliance with the Commission's Conduct Regulation (CFTC Form 185) filers.
Implementing Presidential transition at our agency.
Administering two different electronic financial disclosure systems. If Integrity could support OGE450 filers, CPSC could save money and time. - Influx of new political leadership from the private sector, creating difficult recusal/screening issues. - Turnover in ethics attorneys requires training of soon-to-be hired staff and bringing them up to speed on ethics issues and systems.
Standard of Operating Procedures established to ensure successful transition of personnel leaving for other employment opportunities and/or retirement.
Finding time to administer program in a small agency where there is no staff whose main job it is to administer ethics program.
Onboarding new Senate confirmed Presidential appointees.
staffing
Ensuring the timely delivery of initial ethics training will remain a challenge given the facts that there are over 240 DeCA locations world-wide. The vast majority of new employees are GS-03 without regular computer access.
Lack of full-time ethics program paralegal support personnel coupled with USG hiring freeze.
1. Identification of new entrant OGE 450 filers, especially those employees who are required filers due to additional duties not ordinarily part of their regular duties. 2. Maintaining a high-level of ethical awareness by all agency employees
Modernizing and updating our system of records (converting to completely electronic based)
- Time and manpower - Getting approximately 800 278e and 450 filers to complete annual training on time.
Identifying OGE 450 filer training and ensuring Initial Entry Training occurs and is properly documented.
The potential for several new political appointments or reappointments. Reviewing the agency's ethics program as a whole, and making improvements where possible.
DSS has gained new missions and, therefore, it is likely that the agency will grow in size over the coming years. As a result, we may experience challenges making sure that we have sufficient resources to effectively manage the agency's ethics program.
Implementing changes to comply with revised CFR provisions and ensuring new entrant filers file their report within 30 days.
Educating Commissioners as new Commissioners are appointed.
USDA's Ethics Program is very small -- with 21 employees in December 2017 (as compared to the 36 FTE employees USDA's Ethics Program had in 2008 -- a 42% reduction in staff). The USDA Ethics Program will

<p>face the challenge of providing extensive, high-quality, ethics advice, training, and timely financial disclosure reviews for appointees and career staff. USDA's Office of Ethics will also be heavily tasked to provide timely Hatch Act advice and training for all employees to minimize risks of political activity violations. Due to its small staff size the Office of Ethics must also allocate resources to continue to conduct regular trainings and advice-giving provided to all 100,000 USDA employees and numerous USDA Advisory Committees. As a result of the long-term effects of systematic reductions in staffing and budget constraints, OE's small but dedicated team will continue their extraordinary efforts to provide high-level service to USDA's appointees and career employees.</p>
<p>Giving guidance and training to 46,887 Commerce employees, managing Integrity, establishing an online confidential financial disclosure program</p>
<p>Manpower shaping ethical culture inserting technology to enable access of materials and increase consistency of advice</p>
<p>Ensuring agency HR personnel fulfill their responsibilities under 5 CFR 2638. Providing high quality and timely ethics support and training in light of the transition, rule changes, and high DoD turnover rate of both ethics counselors and filers.</p>
<p>Reductions in budget and personnel impact on the administration of the ethics program. Impending wave of senior military and civilian retirements and advising these employees on Section 1045 of NDAA for FY18 and the impact on their post-government employment restrictions. Providing quality ethics advice to a geographically dispersed workforce. Ethics staff turnover at all levels requires constant training.</p>
<p>Educating workforce regarding and ensuring compliance with new written WAG requirements and addressing spontaneous invitations (e.g., individual attending conference/meeting invited during that event to an after-hours event). -DDAEOs reported significant challenges with maintaining oversight of geographically dispersed workforce and continuity as ethics counselors transition in and out of field offices, particularly for military commands. -DDAEOs reported difficulty obtaining and keeping paralegal and support staff positions as leadership looks to cut staff.</p>
<p>The Ethics Division is expecting two retirement-eligible, senior level Division employees to retire in the face of increased workload without the attendant capacity to handle the workload (the agency is under a hiring freeze until 9/30/18), which is ultimately detrimental to the agency. The most critical need for an ethics attorney is in the area of financial disclosure. The Department has approximately 1,400 financial disclosure report filers. The Ethics Division has had to put some internal projects on hold indefinitely due to the increase in competing priorities and the shortage of staff. These project are designed to enhance the outreach and communication efforts to Division employees and other stakeholders (such as the overhaul of the program's presence in the agency intra-net site, converting materials for section 508 compliance, and updating on-line training modules).</p>
<p>Retaining and recruiting qualified ethics staff continues to represent a challenge for the HHS ethics community.</p>
<p>Do more with less. Increase public interest in release of information.</p>

HUD OGC - The increase in novel ethics questions and FOIA document production requests. OIG Budgetary restrictions hampering hiring in concert with an aging workforce
Succession planning, training new ethics officials and financial disclosure reviewers, financial disclosure of nominees and new filers, implementation of new OGE Rules and reporting requirements, technology and staffing needs
Providing the same level of service with a reduced staff
Rotation of ethics attorneys Retirement of knowledgeable ethics support staff
1) Lack of information from leadership. 2) The new OGE requirement that Initial Ethics Training and Annual training be interactive present challenges. Our employees are widely dispersed and many are intermittent or part-time employees. 3) Keeping training current, relevant and memorable. 4) Developing online training modules for filers and non-filers. 5) Lack of staff and budget.
We are working to strengthen the relationship with Human Resources so that they understand their responsibilities for providing timely notice of new employees, promoted employees, and departing employees
*Continuing Presidential transition period, given Treasury's large number of political appointees. *Administering OGE Integrity e-filing process and system (including supporting the large number of new filers, especially given the January 2018 departure of our HQ employee who administered Integrity day-to-day operations). *Securing and maximizing technological resources to implement and enhance ethics programmatic requirements. *Maximizing existing human capital to meet ethics program requirements due to employee departures and other personnel changes. *At bureaus with multiple geographic locations, finding effective ways to reach employees, given agency's multiple geographic locations and large facilities.
Staffing. Implementation of supplemental ethics regulation
1) Increasing scrutiny and attention to ethics issues means an increasing workload for existing staff, which is already strained. 2) Anticipate an increase in seeking and post-employment counseling as a large percentage of EPA career staff is eligible for retirement. 3) Need to augment the EPA Ethics institutional memory.
EEOC has a total of 6 PAS positions. Three, and possibly four, PAS employees are expected to be appointed during 2018. Providing initial and ongoing counseling to the new PAS employees will be a challenge since it is anticipated that most, if not all, will be new to federal service.
Insufficient staffing. Inadequate succession planning.
Continued use of Integrity for non-native technology users Retirement of current DAEO
DAEO retirement
Increased public attention to ethics issues throughout the government. OGE's Desk Officer Program has, at times, not been sufficient to meet our needs.
Succession planning and modernizing existing technology.

Conducting multiple sessions of "live" ethics training for all agency employees.
We would like to automate our form 450 financial disclosure process. There are restrictive budgetary considerations.
High volume of 278 filers - Transition to an electronic 450 filing system
Continuing to develop new training materials and cutting-edge ways to educate our workforce about ethics requirements.
No significant challenges.
Our small size and number of employees scattered through out the U.S. in 60 field offices makes difficult to provide in person training for all employees.
Convincing all Commission public filers to use Integrity for financial disclosure reporting. Also, constant vigilance for potential conflicts of interest, particularly if the present nominee for the Commission is confirmed.
Developing or adopting an electronic confidential financial disclosure reporting system and integrating it with our financial disclosure report tracking system
OGC's greatest challenges in the coming year will be (1) to continue to improve the process for Agency notification of OGC that employees have entered confidential financial disclosure filing positions and (2) to continue to refine our ethics training program for maximum efficiency.
Managing competing priorities with a small staff continues to be challenging. We continue to face challenges (monetary and otherwise) to adopt new procedures. We are still attempting to launch an electronic tracking system (to ensure timely notification of new hires, promotions, and other actions that trigger ethics-related requirements). We would like to acquire a free or low cost option for e-filing for 450 reports (we wish Integrity could be used for this purpose). We would like to have a more systematic approach of identifying potential conflicts of interest (e.g., develop a searchable, electronic database that allows program staff to efficiently identify involved/affected persons and entities). We also strive to ensure that all future employees have a full understanding of potential conflicts concerns (preferably before an offer is made and definitely before an offer is accepted).
The lack of an electronic confidential financial disclosure system.
No significant challenges -- GCERC has a small staff, all of whom are career employees.
Our program is very small with only collateral duty FTEs. We must maintain the level of compliance we have with very limited resources.
the agency is transitioning to a new grants management system, that will require the development of new ethics modules with mechanisms for electronic gatekeeping that will assist IMLS ethics officials and program staff in the identification and verification of actual and potential conflicts of interests.
This was a transition year in which the former ADAEO resigned and a new ADAEO came on board. Fortunately the new ADAEO was already familiar with the IAF Ethics program and all the responsibilities necessary for the job. A new ADAEO will probably come on board sometime within the next month and it

will take some time to get fully aware of IAF ethics program practices, and procedures. Another general challenge is balancing the demands of the ethics program with the demands of the rest of the office.
Employee turnover due to separations, retirements, and movement to other federal agencies.
Providing necessary training information to employees Identifying potential conflicts in review of financial disclosure reports
As always, our micro agency staff status - 2 FTE's and 1 PTE - with our regular workload and extra requirements of the Foundation's mission, limits the time for our ethics program.
Timely filing of SGE reports.
Continuity of operations
Continued compliance with filing of new entrant/termination 278s filing of 278 Transaction Reports reminding employees that a baseline knowledge of all ethics rules is expected.
Retirement of DAEO
Addressing ethics dimensions of increased commercial space activities and public-private partnerships. Fully conveying the benefit of being ethically compliant.
Human Capital moving to a shared services system and integrating those systems into the ethics processes as required by the new regulations.
1. We are undergoing a major agency restructure in the next year or so where we will move from 5 regional offices to 3 regional offices. This will entail regrouping close to 1000 financial disclosure filers for required ethics training and filing. 2. Continuing to think about new and innovative ways to make training more exciting and interesting for our employees.
The ethics practice is a significant part of our small office's workload and a large component of the work for the DAEO and the ADEAO. The challenge is to to allocate our resources to ensure the ethics practice remains robust and ethics matters are addressed on a timely basis. Fortunately, we prioritize our agency's ethics practice and have been able to effectively streamline the office's work in a manner that continues to support a strong ethics practice.
When fully staffed, NEH's OGC has four attorneys and one paralegal currently our paralegal position is vacant and we do not know when we will be able to fill it. An ongoing challenge is balancing ethics program responsibilities with other demands of the OGC, given our small staff.
reviewing well over 1,000 OGE forms within the 60 day time period
The NLRB has worked very hard to develop a robust ethical culture. As a result, we have seen an increase in ethics inquires. This increase in our workload coupled with the departure of an experienced Ethics Counsel has made it difficult for staff to provide comprehensive written guidance within days of the initial inquiry. It is our hope that we will be able to back fill the Ethics Counsel position and add one additional ethics staff member to help us keep our high standards of providing customized, timely, and

comprehensive ethics guidance to all Agency employees, while maintaining a rigorous training program as well.
Succession Planning
Staffing shortages.
Implementing an automated financial disclosure system.
1 month Ethics Counsel gap - Staff composed of 87% detailees
Finalizing Supplemental Ethics Regulations Acclimating new political appointees
New Federal Co-Chair
Identification and execution of improvements to the electronic filing system used for OGE 450 and 450A reports.
Filing in Integrity Ensuring SGEs understand ethics obligations
We are working on familiarizing new political appointees with the numerous ethics requirements and ensuring compliance.
To continue providing support to other components of the EOP upon request.
No permanent agency Director.
We need an additional, dedicated full time ethics attorney. One full time attorney is not enough to handle the volume and complexity in this portfolio. The robust training effort has continued to increase the volume of requests for advice and counseling.
Transitioning into the new Administration.
Continuing to maintain OPM's Ethics Program's historic high standards.
Limited staffing.
Competing OGC demands on the DAEO and ADAEO's time.
With the presidential transition, ODNI continued to experience turnover of senior employees requiring substantial resources to be devoted to post-government employment counseling, nominee financial disclosure, and basic ethics training for new senior government employees.
Although we have established procedures with Human Resources to notify us of Form 450 filers, we must be vigilant in ensuring the procedures work.
Ethics Counsels are detailees from other agencies, so there is annual turnover.
Understanding and adapting to the latest changes in ethics regulations and laws.
Developing more innovative training resources to address the unique nature of work performed by staff at Peace Corps - Developing a streamlined electronic tracking system in coordination with the OCIO and HR for 450s, 278s, and ethics training to create a live ethics program dashboard. This would allow an overview

of the ethics program's current status and effectiveness at any time - Drain of ethics agency knowledge due to staff turnover based on 5-year appointments - Numerous staff at Regional Recruiting Offices are disconnected from Peace Corps Headquarters - Staff at overseas posts face unique ethics challenges - Changes in ethics staff
1. Training new attorneys 2. Succession planning 3. Continually finding new and innovative ways to train employees and provide information
Creating appropriate agency supplemental standards.
We will need to process incoming appointees to ensure there are no ethical conflicts.
Training new ethics staff while maintaining our ethics services to the agency.
technological improvements in 450 filing and our personal trading compliance system are needed.
Insuring continuing compliance with all new ethics regulations.
Computerized training Succession Planning
Our greatest challenges include the ability to provide ethics training that can reach all agency employees (beyond new employees and management) balance ethics with other workloads and invest time for outreach and training initiatives.
Continuing to ensure that employees sent to Afghanistan have timely access to the Financial management Disclosure system.
Accessing sufficient human capital for succession within the ethics office
Continuing to identify new and innovative ways to foster an ethical work culture
We continue to have a high proportion of detailees, relative to permanent employees, and two geographic locations separated by a significant distance. At the same time, due to additional responsibilities assigned to the agency through the Inspector General Empowerment Act, we are adding permanent staff members. Particularly as we are a micro-agency, in light of these conditions, the ethics staff will continue to be challenged with ensuring that ethics awareness remains at the forefront of all staff members' minds.
With several federal vacancies to be filled within the agency, the ethics program will train new employees on the government ethics rules and filing requirements.
Integrity system roll-out for public financial disclosure filers coupled with switching 278 filers to Integrity system and training all of them in the use.
Continuing to improve our systems for tracking our employees ethics and financial disclosure filings. Working to ensure a smooth transition for our future incoming political appointees as they are nominated/confirmed. Continue to improve the Service Now ethics inquiry/resolution tracking system.
The increase in novel ethics questions.
The Commission's prior ADAEO retired in mid-2017 after managing the program for over 30 years, and returned on a limited basis until a new ADAEO could be recruited and hired. As a result, the ethics program

was understaffed for half of 2017. Additionally, the ethics program needs additional budget and technology support to launch an online conflicts check system and to implement electronic filing of OGE 450 reports. Finally, the ethics program needs to work more consistently and collaboratively with the Office of Human Resources to ensure that the ethics program receives timely notification of changes in personnel.
Organizing ethics files from previous filing system and as IT infrastructure is upgraded.
Ensuring the ethics training VEF staff receive is timely and is relevant to their needs.
Responding to an unprecedented of number of media inquiries and heightened public scrutiny relating to the activities, financial holdings, and disclosures of White House officials.

24. If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET. **Q24 Table**

1 employee had schedule conflicts attended training on detail here & was lateral hire
1 employee joined the agency but then quit prior to completing IET. Five employees were tardy.
2 employees will received IET on 2/7/18. One employee was a transfer from OVP & IET was not required
Administrative oversight.
AF employees receive training as part of in-processing delivery may vary from location to location.
Can't confirm 1 received at all or that 4 received it within 3 mo sit. addressed with offices.
Communication issues relating to Transition and new Administration.
DAEO gapped for 9 months, therefore, no tracking or training provided for that period. Tracking and training has been reestablished.
Difficulty in accurately tracking completion of initial ethics training via computer.
Due to staff shortages the Training Development could not present all IET classes as planned.
Due to various reasons, a small number of new hires missed the programmed block of training.
employee left the country on travel within first 14 days of onboarding
Employees did not respond to our requests and supervisory intervention was required.
Employees have been notified of IET requirement.
Employees misunderstood training req. The Ethics Program increased the freq. of generating reports.
extended leave, and inability to access online training.
Extenuating circumstances, employees on active duty military, admin and sick leave.

HR & Security did not provide our office with information for 5 new employees until Jan 2018.
HR failed to track the on-line training.
HR was not tracking our new entrants to ensure IET occurred. We are correcting this.
Most of these employees came onboard within the last 90 days of the calendar year.
New online training implementation, inconsistencies in database.
No explanation provided
OIG " 6 employees failed to certify their Initial Ethics Training completion in the Learning Portal.
Other training and commitments result in completion beyond the 90 days on occasion.
Our coordination w/ HR regarding training & notification of new employee arrivals needs improvement.
Resource limitations make it difficult to conduct extensive repeated follow ups.
Scheduling problems (employees were eventually trained in 2017).
See additional comments below for Part 6.
See Additional Comments for Part 6, below.
See comment below for additional information.
See comment section.
See end of section comments.
Some employees are intermittent, temporary or part-time employees who do not have access to webinars
Some employees are on extended sick leave. Others did not receive notice, but later given training.
Some of the employees that did not receive IET were summer interns. We also do not have a penalty.
The 2 FTEs received a copy of the Standards at on-boarding and completed AET in lieu of IET.
The incorrect ethics training course was assigned to interns via the Learning Management System.
These 3 employees received repeated e-mail reminders but did not complete the training on time.
Tracking system error that ethics official didn't catch until after the 90 day requirement.
Tracking/notification errors due to ethics staff turnover, scheduling conflicts, (cont'd)
Two centers had difficulty scheduling training for new employees who are on extended leave without

25. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. 2638.303, provide the DAEO with the certification required pursuant to 5 C.F.R. 2638.310? If no, please explain. **Q25 Table**

No, with comment

The written procedures are in place, but did not receive certification from all OAs by Jan. 15.
The Office of Human Resources was unable to provide certification.
The certification notice was not timely received or complete.
See comment below for additional information
Relevant office was unaware of the 2638.310 requirement. Situation has since been rectified.
Procedures are in place per HRM Letter and have been implemented, but not certified.
EPA is working to address this issue.
Due to various transitions and departures in Human Capital, the agency will be implementing in 2018.
DOJ is in the process of implementing these new requirements.
DAEO and Office of General Counsel currently oversees/manages initial ethics training.

Yes, with comment

HR confirmed that ethics notifications were provided in tentative offer letters.
USDA's Acting Chief Human Capital Officer provided the required certification to the DAEO.
HR and OGC Ethics share in the on-boarding process.

26. Did any office not under the direct supervision of the DAEO provide initial ethics training, pursuant to 5 C.F.R. 2638.304? Did that office provide the certification required pursuant to 5 C.F.R. 2638.310? No (please explain) **Q26 Table**

DOJ is in the process of implementing these new requirements.
Due to various transitions and departures in Human Capital, the agency will be implementing in 2018.
EPA is working to address this issue.
OIG " will provide the DAEO with the certification in the near future
Relevant office was unaware of the 2638.310 requirement. Situation has since been rectified.

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. **Part 5 Table**

<p>Question 12: The percentages given relate to the percentage of the time spent on ethics matters (as opposed to the time spent on all employee duties - whether ethics-related or not). As noted above, our time spent on ethics matters is in the 0 to 25% range of all duties.</p>
<p>20. We are revising our Ethics Policy to include ethical obligations for new employees and supervisors.</p>
<p>For Question #12, percentage figures provided in responses are based on approximate, proportional time spent on items (a) through (c), respectively, relative to total time spent on ethics matters collectively by all agency ethics officials.</p>
<p>Question 12. Percentages reflect work on how officers in the ethics program divided their time. Question 18. Inspected by OGE in 2017.</p>
<p>12. the response here lists percentage of total ethics time spent on a specific subject.</p>
<p>The questions that the new ADAEO could not answer may be asked of the DAEO when she returns from maternity leave.</p>
<p>Question 19(Other/Specify): Audit by the Office of Inspector General of our employee offboarding procedures, including post-employment ethics briefings and collection of termination reports from public filers.</p>
<p>Question 20 - Regarding the last 3 unchecked boxes: - In January 2017 the ethics team advised our Human Resources office of the new requirement for ethics notices in offer letters and to supervisors. The Director of Human Resources has confirmed that the notices were implemented in 2017. - Regarding the provision of initial ethics training, while we do not have written policies/procedures, our ethics officials provide initial ethics orientation every two weeks, as we are part of the briefing team assembled for new hires on-boarded at the beginning of every pay period.</p>
<p>Question 16: CEQ did not have an agency head during this period. However, the senior agency official has met with ethics staff and discussed strengths and weaknesses of the ethics program.</p>
<p>19. Ethics training for 450 filers and other DeCA personnel is continuously updated to ensure it not only meets OGE requirements, but to permit the inclusion of topics that may require additional attention from time to time (e.g. more detailed coverage of the Hatch Act during election season, etc.).</p>
<p>With regard to program challenges that the DFAS ethics program faces in Question 23, we are already taking concrete steps and working with other DFAS stakeholders to address these challenges. With regard to identifying new entrant filers, we are collaborating with our Human Resources counterparts to enhance both the systematic and educational processes to ensure timely identification of new filers. We are also working closely with our Contracting Services directorate to get advance notification of employees who are assigned temporary or ad hoc contracting duties, such as CORs. We are also working DFAS leadership on enhancing our overall ethics education for all employees to get beyond the annual required filers and mass advisories. Lastly, we are always actively engaged with all of our agency management at every level to</p>

bring relevant ethics training and updates to all stakeholders and to bring relevant ethics information right to where it is needed.

23. Another of the greatest challenges facing the Office of Ethics is a lethargic and inconsistent USDA Human Resources Servicing Office. The lack of consistency requires the DAEO and ADAEO to spend countless hours to get Human Resources Officials to consistently perform their jobs, such as informing the Office of Ethics when Career SES employees arrive at or leave the Department so that Ethics staff can timely assign them mandatory financial disclosure reports. Finally, because USDA's Ethics Program is so small, it will need to face the challenge of retaining experienced ethics staff. Due to a lack of responsiveness by Human Resources, USDA's DAEO created an Ethics Fellowship Program. Despite the DAEO's efforts to retain staff, USDA's Ethics Program is at risk of becoming a top notch finishing school successfully mentoring and training its staff to achieve very high levels of proficiency so they can obtain higher paid ethics positions at other Executive Branch agencies.

Q.11- Note that this reflects a summary of responses from across the DoD DDAEO component commands and agencies. Obviously, the time spent on certain categories at the HQ/OSD level differs somewhat from the field level, with much more time spent on categories such as public financial disclosure reporting, SGEs and Presidential transition at the OSD/HQ level.

22. The Ethics Division has also streamlined processes to address conflict of interest issues unique to contracting personnel which aided in closing out the agency's 2014 program review with OGE.

11.with other rules, e.g. Bar rules, contractor issues, joint collaboration with nonfederal entities, speaking requests, implementation of ethics program requirements. 12a. Confidential financial disclosure in DOJ is decentralized. Time allocation for DDAEOs and ethics officials varies from 1 - 30% of program administration work, depending on the # of filers in the component and if it is filing season. 12b. The range of time allocation for public financial disclosure in DOJ's components varies (0-50%), depending on the number of filers in the component, and whether it is filing season. The range of time allocation to administer Integrity in DEO is 15 - 30%, depending on whether it is filing season. 12c. DEO primarily responds to Form 201 requests. In 2017, DEO spent less than 15% of program administration time on Form 201 responses. There was an unprecedented number of requests received in 2017. 20. DOJ is finalizing implementation of the new notification requirements.

#12 The percentages are estimated #17 ADAEO created new "On The Move" process to move filers to correct organizational units before filing season began Implemented us of inter-office calendar with dates of ethics related relevant events or actions. Developed tracking spreadsheets to manage review or certification of filers. Use of Tips of the Day seen by employees upon signing onto unclassified computer system. #21 J William Fulbright Scholarship Board has its own statutory authority, but operates in the Educational and Cultural Affairs Bureau and receives administrative support and appropriations through ECA.

11- VA does not have an outside activities regulation. Advanced approval of outside activities not required. Ethics Specialty Team is proposing implementation of a supplemental ethics regulation addressing outside activities.

<p>Informal process for follow-up with late financial disclosure filers is in place which will be formalized by inclusion in our written FD policy.</p>
<p>#19 - With the Information Technology staff, began assessing options to replace the current internal financial disclosure and ethics tracking system. #20 Initial Ethics Orientation is incorporated in the Corporate University On-boarding procedures.</p>
<p>16. We present ethics program concerns to the General Counsel, and would only contact the Chairman if a matter requires his direct attention or knowledge.</p>
<p>22. cont.-all employees at the GS13 and below who were hired before January 1, 2000 to ensure that all of our employees have attended at least one, detailed ethics training session (prior to that timeframe, the FTC did not provide ethics training to all new hires). The Ethics Team launched new annual online training for employees who were not required to take live training in CY-17. This new online training was a modification of the Oregon Trail game, requiring FTC employees to correctly answer a series of ethics questions as they progressed (or perished) along a wilderness journey between the FTC's headquarter office in Washington, DC and our regional office in San Francisco. We built upon our prior success and created a calendar for CY-18 featuring the dogs and of the FTC (loaded with federal ethics information). We also continued to feature dogs of FTCers barking ethics tips in our quarterly newsletter (the winning pooch continues to be featured on blow-up posters around the FTC).</p>
<p>Q21: Through an interagency agreement with the National Endowment for the Arts, NEH provided administrative support, including ethics program services, for three employees of the President's Committee on the Arts and Humanities (PCAH) during most of 2017. NEH did not provide ethics program services directly to the PCAH as an organization, but only individual ethics advice and training to the three PCAH staff members who were NEH employees. NEH ceased providing ethics and administrative services to PCAH when it disbanded in the fall of 2017.</p>
<p>Question 12 - It is impossible to estimate how much time the entire agency spends on administering these programs. The ethics program has a role, HRM has a role, supervisors have a role, our IT division has a role.</p>
<p>#16 - As a small agency, we do not meet formally with the Chairman to discuss our ethics program. However, our Chairman is in regular contact with us regarding ethics matters.</p>
<p>We have great leadership support at all levels - the political leadership, the career leadership, and the leadership inside the Office of the General Counsel. And, other Divisions are involved in helping to design and develop the processes and systems to improve our Program, especially the Management and Operations Division and the Budget Review Division, which have been instrumental in helping to build the OMB Ethics Portal and all that it entails.</p>
<p>16. The DAEO meets with the agency head weekly where ethics issues are addressed. 18. Self-assessments conducted via weekly DAEO meetings with Ethics Team.</p>
<p>12c. White House Counsel's Office fields all 201 requests for OVP.</p>
<p>#20 - While we have informal written procedures, we are developing formal SOPs for the collection/review of financial disclosure reports.</p>

Question 20: TVA is in the process of developing a written protocol regarding the provision of initial ethics training. It is expected to be completed by the end of the 2nd Quarter in FY2018.
20 - Written policies were not in place by the end of CY 2017 for issuance of notice of ethical obligations in written offers of employment, provision of initial ethics training, and issuance of ethics notice to new supervisors however, they have since been issued and are now in place.
ALL QUESTIONS - The U.S. Dept of Housing and Urban Development(HUD)runs the USICH ethics program. The answers provided in this part reflect HUD's ethics program. Agency in this part refers to HUD, not USICH
#16 the DAEO meets regularly with the Postmaster General.
Question 16: The DAEO and the White House Counsel regularly consult with the Chief of Staff on matters of importance to the ethics program.

28. Did the head of the agency complete either initial ethics training or annual ethics training in 2017? **Q28 Table**

Yes, with additional comments

Acting Director for DeCA currently serves as Director for the Navy Exchange Command.
Attended in-person Annual Ethics Training
Both the former Chairman and the new Acting Chairman completed annual ethics training in 2017.
Secretary of Agriculture Sonny Perdue received initial ethics training on his first day as Secretary
The ADAEO gave desk side training to the Secretary of the Army.
The career executive serving as Acting NASA Administrator completed annual ethics training 10.6.17.
The Director received one-on-one initial ethics training on his first day at OMB.
Yes, the agency head completed annual ethics training in 2017.

If not, please explain.

The individual performing the duties of the chair (in the absence of a PAS) only received counseling
With the retirement of the ADAEO we were not able to offer annual ethics training in 2017.
The head of the Agency's term ended in 2017.
Due to understaffing in the ethics program, the Chairman did not receive ethics training.
DAEO did not complete training last year due to heavy schedule Planning for February session

29. Did the deputy head of the agency (e.g., Deputy Secretary, Deputy Administrator, etc.) complete either initial ethics training or annual ethics training in 2017? **Q29 Table**

Yes, with additional comments

Deputy Secretary Steve Censky received initial ethics training on his first day as Deputy Secretary.
The ADAEO gave desk side training to the Under Secretary of the Army.
Yes, the deputy head of the agency completed annual ethics training in 2017.
The Vice Chairman completed annual ethics training in 2017.

Not applicable, with additional comments

There is no such position. CSB has four board members. All four completed ethics training.
The Trust does not have a Deputy head of the agency.

If no, please explain.

Unable to complete training until Jan. 2018 due to other obligations.
Due to understaffing in the ethics program, the Vice Chairman did not receive ethics training.
DAEO did not complete training last year due to heavy schedule Planning for February session

30. How do you deliver IET to new employees? Specify Other. **Q30 Table**

DAEO personally introduces himself as the ethics official to each new employee.
The Office of Ethics created new ethics training in AgLearn that is fully compliant with Part 2638.
Teleconference.
OIG - online links to ethics training on the HUD OIG Intranet Learning Portal
Online/written materials (only) are an exception to DOJ's standard practice of live/interactive IET
For CY2017, personnel in region/field were given a written quiz to complete and forward to ethics di
At one bureau, introduction of ethics office at orientation & notification--see end of section
Teleconference with Regional Offices as needed.
The Foundation has ha IAA with IBC/DOI for all personnel activities/requirements.
Talent Management System (online training and tracking system)

OA political appointees receive one-on-one briefings.
Teleconference
Railroad Retirement Board (RRB) University (an interactive training system).
Telephonic
Summary of ethics rules to all new employees

31. Who developed the IET training materials? **Q31 Table**

How did you access the training materials? Specify Other

Free online from USDA
Department of Justice printed material
HUD
I "borrowed" Jeopardy! and You Want to Be Millionaire from another agency and adapted it

Specify Other.

For one bureau, self-paced web-based supplemental ethics training developed by a private vendor.
Web-based training is provided by SkillPort and administered by EEOC's Employee Development Center.
Outside education technology provider.
OIG uses an interactive web-based training module produced by SkillSoft, an OIG.

32. How many new appointees were required to receive ethics briefings by December 31, 2017 (5 CFR 2638.305)? If applicable, please explain why some appointees received their briefing beyond the 15 day requirement or have yet to receive their briefing. **Q32 Table**

1 Briefing was scheduled within 15 days but was cancelled due to appointee's unforeseen schedule conflict. It took place within appointee's first month.
A new Chair was appointed on October 31. He received an ethics briefing in mid-December.
Due to priority work and illness.
In 2017 the NRC had one PAS nominee confirmed on June 26, 2017. This individual was a sitting Commissioner at the time, and thus she had already received her required annual ethics training as a public filer on April 25, 2017. After it became clear that the new requirement to receive an initial ethics

briefing was applicable in her situation, this individual received her initial ethics briefing on July 17, 2017, 21 days after her confirmation.
Nominee for CEQ member has not yet been confirmed by the Senate, and therefore yet to be appointed.
OA has no PAS appointees.
Unable to contact them

33. Who provided the briefings to the appointees? **Q33 Table**

Acting Designated Agency Ethics Official
ADAEO
ADAEO
ADAEO
ADAEO
ADAEO & Ethics Attorney
ADAEO and career Deputy General Counsel
ADAEO and Counsel for Ethics
ADAEO and other ethics official.
ADAEO/DDAEOs
All Ethics staff.
Alternate DAEO
Assistant General Counsel (Ethics) and Acting General Counsel
Chief, Ethics Law Division (ADAEO) and Deputy Chief, Ethics Law Division.
DAEO
DAEO
DAEO
DAEO
DAEO
DAEO
DAEO
DAEO and HR

DAEO for some ADAEO for most
DAEO or ADAEO (when she was still here)
DAEO, Acting DAEO and Ethics Attorneys.
DAEO, ADAEO
DAEO, ADAEO, and Ethics Staff Attorneys
DAEO/ADAEO
DAEO/ADAEO
Deputy Ethics Counselor
Designated Agency Ethics Official
Designated Ethics Counselors
Director, Air Force Ethics Office
Director, Departmental Ethics Office and senior ethics officials
Ethics and Appeals Division and ADAEO
Ethics attorneys at VA Central Office
Ethics officials.
for the Administrator: DAEO and ADAEO for the other appointees: ADAEO
Headquarters Ethics Attorneys
NSC Ethics Counsel
Office of General Counsel
Office of the Secretary Ethics Attorneys
OGE
Senior Ethics Counsel and DAEO
The DAEO
The DAEO
The DAEO and ADAEO
The DAEO and ADAEO provided the ethics briefings to new appointees, in in-person meetings.
The DAEO and her staff.

The DAEO and the ADAEO
The DAEO or a senior ethics attorney
The DAEO with the assistance of the ADAEO would provide those briefings, but there were no new appointees in CY2017.
The DAEO, Charles Beamon and Kathryn Allen, Acting ADAEO, and Nneka Frye, Managing Attorney provided the ethics briefing.
The DAEO.
The Designated Ethics Official - our appointee was leaving for the holidays and the DAEO was on leave. We had a limited window of time in which to provide the briefing, and our DEO is fully competent to provide any necessary briefings or training.
The new appointees ethics briefings were provided by the DAEO, ADEAO, or other Ethics Official at the Associate General Counsel level or higher.
USDA Office of Ethics staff.
White House Counsel
Written materials provided by the Human Resource Specialist at the time of on-boarding.

34. If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training. **Q34 Table**

1 deployed military, 9 non-compliant
1 PAS, 1 278, & 9 450 filers retired prior to training. 4 450 filers are on extended sick leave.
1 public filer left for another Federal agency 1 confidential filer completed late.
2 450 filers are on administrative leave. See below for further explanation.
2 terminated employment before annual training was held. 2 will makeup the training within 30 days.
278 - 1 employee passed away before completing training. 450 - 2 SGE did not take training
37-OGE 278e filers and 5-OGE 450 filers completed in January 2018. Actively working on 43 450's
4 resigned/retired, 1 on extended admin leave, 1 tardy.
450 Filers/required/received. One 450 filer left the agency before the training for 450 filers.
6 retired - 1 On extended sick leave- 1-resigned 10-did not take training -1 term ended,
-87 Filers left the agency before training occurred -4 left filing positions -4 did not get trained
A confidential filer retired in summer of 2017 and did not receive annual ethics training in 2017.

Administrative, medical, or military leave of absence.
DAEO gapped for over 9 months, offered training was limited to 3 months (January, November & December) in 2017.
DAEO is scheduling training for February
Difference in CFDs trained and number of reports filed (#61) is due to different reporting systems.
Discrepancies reflect those filers who left IMLS prior to conducting annual training.
Discrepancy resulted from employee separation, extended leave, employee details, and retirement.
Due to the ADAEO's retirement, the ethics program was unable to provide all required training.
Employees on extended leave or delinquent.
Employees on extended leave or detailed to another agency during training sessions.
Employees were on extended medical leave, administrative leave, or military leave.
Employees were out of the office due to leave (sick and annual), transfers, etc.
Employees who have not completed the training continue to receive electronic reminders.
EXIM requires all employees to receive training. A few were excused for specified reasons.
extended leave, including medical emergencies or maternity/paternity leave
Extended leave/Military leave/Left agency.
Fifteen employees did not complete the AET by 12/31/17, however they all completed it by 1/15/18.
Filers left the Agency prior to completing training in 2017
For public & confid filers, the discrepancies are b/c the filers on-boarded after the training date
Increase in other members receiving training over 2016 due to improved field reporting.
Individuals departed prior to end of training period, extended absences for sickness or military.
Learning Link no yet available, but the CY 2017 How to Keep Out of Trouble summary was circulated
medical leave, deployment, disaster response operations, departing federal service before year's end
Most of the 17 employees are on extended or military leave one bureau in process of providing make-
Nineteen employees left the agency before NEH provided annual ethics training in the fall of 2017.
Numbers above are percentages rather than actual numbers.
One employee was on extended medical leave and one was out on workman's comp.
One on maternity leave - political appointees received initial ethics training during the year.

One PAS filer has not yet completed the training due to other obligations.
One public filer left the agency at the end of the year.
Operating Administrations had employees on extended sick leave and military deployment
Please see additional comments
Please see attached document for an explanation of the discrepancies.
See Additional Comment For Part 6.
SEE ADDITIONAL COMMENTS AT END OF SECTION
See Additional Comments at the end of this section.
See Additional Comments below.
See additional in comment section.
See below in comments for additional information.
See comment section.
See comments
See comments.
See notes at end of section.
Separations/Extended Medical Leave/Detailees/Promotions to SES
Seven Public filers moved or retired. One missed because of his transition to a new org within DLA.
Some employees left the agency prior to completing training.
Some employees left the agency prior to the training, others completed the training after deadline
Some rq'd 450 filers were no longer employed or in a rq'd position by ethics training season
Some were on admin or extended sick leave, and some were no longer employed.
Technical issues and schedule conflicts were given as reasons for not completing the training.
The DAEO/GC had significant other acting positions and there were no resources to complete them.
these employees did not complete the training due to technical difficulties while overseas
Three employees had technical issues logging in the first time. They completed training after 1/1/18
Training was not provided due to short staffing (ADAEO detailed to another agency).
Two employees were on extended leave, and three received training upon return from holiday leave.

Two file at other agencies and received training there. The third did not perform work in 2017.
Two were on convalescent leave during the whole period live sessions were offered. Continued below.

35. How do you deliver annual ethics training to Executive Schedule Level I or Level II employees? Specify Other. **Q35 Table**

2017 was the first year of the Administration and the required one hour of Initial Ethics Training was provided to White House Office employees. Annual ethics training for all White House Office employees has occurred in January 2018. The White House Counsel, along with the DAEO and ADAEO personally conducted the live training in six(6) sessions.
35. We do not have an employees at this level.
CEQ does not have Executive Schedule Level I or Level II employees.
DFAS has no Executive Schedule Employees
DIA does not have any Executive Schedule Level I or II positions or anyone who is paid at those levels.
DISA does not have any Executive Schedule Level I or II positions or anyone who is paid at those levels
EEOC does not employ any Executive Schedule Level I or Level II employees.
FDIC does not have Level I or Level II PAS.
Monthly ethics briefings.
N/A - USICH has no employees at Executive Schedule Level I or II
n/a - we do not yet have an Executive Schedule Level I or II employee.
N/A we have no such category of employee
N/A, but the the survey forces me to provide an answer, even though it doesn't apply to my agency.
n/a--we had no EL I or EL II employees in 2017.
No Executive Schedule 1 or 2 employees
No Executive Schedule Level I or Level II employees training not required.
OA has not Level I or Level II employees.
Postal Service doesn't have Executive Schedule Level I or Level II employees.
Selective Service does not have any ES Level 1 or II employees
self-paced online training that meets OGE's requirements.
Self-paced web-based training

Teleconference
The Commission does not have any Executive Schedule Level I or II positions or anyone who is paid at those levels.
The Commission does not have any Executive Schedule Level I or II positions or anyone who is paid at those levels.
The ITC does not have any employees at the Executive Schedule Level I or Level II.
The only executive schedule employee is the Federal Co-Chair and he is a Department of Commerce employee
The Trust has no Executive Schedule Level I or Level II employees.
This agency has no Executive Schedule Level I or II employees.
This questions is not applicable to the CFTC. The CFTC does not have Level I or Level II employees.
This year all NEH staff received and completed on-line interactive ethics training.
TVA does not have Executive Schedule Level I or II employees.
We do not have any Executive Schedule Level 1 or Level 11 Employees.
We do not have any Executive Schedule Level I or II positions or anyone who is paid at those levels.
We do not have any Executive Schedule Level I or Level II employees.
We do not have Executive Schedule Level I or Level II employees.
We do not have Level 1 and 2 employees.
We don't have any Executive Schedule Level I or Level II employees.
We don't have ES employees
We don't have such employees.
We have no EX I or II employees
We have no EX I or II employees
We have no Executive Schedule I or II employees.
We have no Executive Schedule Level I or Level II employees.

36. How do you deliver annual ethics training to non— Executive Schedule Level I or Level II public filers? Specify Other. **Q36 Table**

2017 was the first year of the Administration, the required one hour of Initial Ethics Training was provided to White House Office employees. Annual ethics training for all White House Office employees has occurred in January 2018. The White House Counsel, along with the DAEO and ADAEO personally conducted the live training in six(6) sessions.
Employees who could not attend live training completed online interactive training.
Ethics website and electronic employee newsletter
Monthly ethics briefings.
Staff Meetings - DAEO
Teleconference
The Agency has no Executive Schedule Level I or II employees
The only public filer is the DEAO
This year all NEH staff received and completed on-line interactive ethics training.
We don't have ES employees

37. How do you deliver annual ethics training to confidential filers and other covered employees not required to file a public report? Specify Other. **Q37 Table**

Employees who could not attend live training completed online interactive training.
Ethics website and electronic employee newsletter
Interactive web-based training
Staff Meetings - DAEO
Teleconference
This year all NEH staff received and completed on-line interactive ethics training.
We don't have other employees required to receive training.

38. How did you access the training materials? Specify Other. **Q38 Table**

From ethics materials posted on other agencies' public-facing websites.
Confidential filer training is accomplished via AgLearn+ using modified material obtained from USDA

Accessed online materials from other federal agencies.
Inter-active web-based training available on Dept. of Agriculture website.
From ethics official at another agency.
We have used other agencies ethics training programs that are publicly available online (USDA).
Using the Link at OGE for the SGE Ethics Training.
Paul Zimmerman from the Inter-American Foundation developed and presented our annual training.
SkillSoft, an OIG training vendor.
HUD

41. Which groups did you target? Specify Other. **Q41 Table**

All agency lawyers.
All Federal employees at USADF HQ in DC (including those not required to file Financial Disclosure Reports), all contractors working at USADF HQ in DC, locally hired personal services contractors at USADF Field Offices in Africa, and representatives of USADF Partner organizations in Africa received ethics training during 2017.
Commissioners
SGEs
Specific offices when requested.
Non-PAS political appointees regarding Ethics Pledge and other specific standards of conduct regulations that PAs will encounter frequently.
Category Managers and Buyers as well as store managers.
Other interested agency stake-holders, including other professionals such accountants and auditors, members of non-federal entities composed primarily of agency personnel and agency organizational units with a need for specific ethics training.
Local nationals where DLA is stationed outside the U.S.
Delivered scenario-based ethics training to supervisors of a division of our Agency upon request.
Ethics Training was provided to audiences of USDA summer college and law school interns to raise their awareness of these rules.
Senior Leaders/General Officers

Inspectors General, SES/General Officer staffs, congressional liaison fellows, Training with Industry personnel. Some supervisors required ethics training for 100% of their personnel, filers and nonfilers alike.
Different commands throughout the Department of the Navy elected to require different assigned personnel to complete training.
Senior Leader staff.
Specialized training per principal office component upon request
New political appointees.
Agency ethics officials, political appointees and interns.
Investigations, Leadership year so all leadership engagements/conferences, political appointees.
Most DOJ attorneys must receive 1 hour of annual ethics training as a component of Professionalism Training. The # of attorneys who received ethics training under this requirement in 2017 was approximately 9900. Most attorneys at DOJ are financial disclosure filers, but not all are. Many DOJ components require all employees to receive annual ethics training independent of financial disclosure status or whether they are an attorney. Administrative and Executive Officers and Advisory Boards received targeted ethics training.
Grant managers, senior department personnel, new attorneys, new investigators, new managers
Varies by bureau, but includes Hatch Act briefing for all political appointees including PAS 1:1 post-employment briefings for most departing employees economists Office of Innovation staff various work groups as requested advisory committees Fiscal/Financial Agent Selection Teams.
Office of General Counsel Attorneys Office of Public Affairs National Conference
Designated Federal Officers for FACAs, specific offices or groups upon request.
Examiners and Oversight Managers.
Oustationed Bank Examiners
All FTC employees hired before January 1, 2000 at the GS 13 level and below received a one-time online training. We separately provided live annual training to employees at the GS 13 level and below designated by management to receive annual ethics training (they will get live training every three years with online training in the interim years along with our GS 14 and GS 15 level employees).
Incoming appointees, departing appointees (upon request) and other agency personnel upon request.
legal personnel
Interns, Source Evaluation Boards, Astronaut Corps, Center Management Teams, Contract Official Representatives, Managers, Supervisors, Scientists, and one center required all personnel to attend training.
Targeted training for the Office of Innovation and six individual field locations.

We provided Working with Contractors training to various offices
Senior Leadership, OIG, New Program Officers, and Departing Officials
Professional Development Program Participants
Specific NRC offices
Technical Evaluation/Source Selection panels, outside employment and intern initial ethics training.
We did periodic ethics training for the USDS employees, and separately, the USDS procurement team.
Departing employees regarding post employment restrictions.
Departing political appointees
Provided to those seeking post government employment OGE 450 & OGE 278 reviewers specialized training for new ethics officials
Joint IG Course designed to train Department IG's worldwide. Provided visiting Foreign Dignitaries briefing on ethics because they were interested in establishing their own ethics program.
Overseas staff, staff in Acting positions, Official Travelers, Gifts and Grants Management Office staff
Provided specialized training to hospitality staff and members of the Trust grounds crews.
New supervisors and managers.
OGC Attorneys, ALJs, Hearing Office Directors, Attorney Advisors, Executive Officers, and Candidate Development Program for SES participants.
TVA Officers TVA Board of Directors
All Non-Bargaining Unit employees.

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. **Part 6 Table**

#24 and #34 During the month of December, the Foreign Service Institute (FSI) which delivers the online training experienced registration problems which precluded employees' ability to register and take initial and annual training by December 31, 2017. This caused some employees to do training offline or after the due date. #25 Procedures for implementing 2638.303 and 2638.310 were developed in 2017 and our office received the certifications on January 15,2017.
#32 - We did not have any new appointees.
#34 - 2233 employees required to receive training attended classroom/virtual training. All employees received FDIC's revised ethics directive as well as the Chairman's video message. #39 - 133 non-filers received training.

<p>#34 - 92 Public Filers were required to complete annual training and all but 5 filers completed the training by December 31, 2017. These 5 filers, who had difficulties including technical issues and schedule conflicts, completed the training on or before January 5, 2018. In addition, 5 filers who are not included in the 92, retired or left the NLRB on or before the training was distributed. 30 Confidential Filers were required to complete the annual training and all but 4 completed the training by December 31, 2017. These 4 filers, who had difficulties including technical issues and extended leave, completed the training on or before January 5, 2018. In addition, 1 filer not included in the 30, retired on or before the training was distributed</p> <p>#40 - Provided comprehensive Hatch Act training in a variety of mediums addressing political activity not relating to an election. Also provided an annual reminder concerning speaking in an official vs. personal capacity.</p>
<p>#34. 1 450 filer out due to illness, will receive by end of February. 3- 450 filers left before end of year. Only 1 non-450 filer on admin leave.</p>
<p>#38 - Paul Zimmerman, GC and DAEO for IAF, conducted our annual training.</p>
<p>#39 All agency personnel were required to take annual training.</p>
<p>#40 - The IMLS Ethics Office provided several hours of specialized training sessions during 2017 to ensure that all IMLS employees were aware of the new ethics rules and regulations that were published in January 2017.</p>
<p>#41. All agency personnel</p>
<p>#41: In 2017, CFTC Ethics provided two different workshops. One targeted Public Financial Disclosure Filers and explained how to complete the OGE 278e and the other targeted Confidential Financial Disclosure Filers and explained how to complete the OGE 450. All filers received the written training material applicable to their filing status. The optional training sessions were conducted live and by video teleconference to regional offices for those employees choosing to attend. Additionally, CFTC Ethics distributed material to all employees explaining how to search the National Futures Association BASIC website for prohibited interests. CFTC Ethics also provided SGEs one-on-one new entrant ethics counseling tailored to issues most frequently encountered by CFTC SGEs. Lastly, CFTC provided supplemental one-on-one briefings to staff upon request, candidates being considered for senior positions, and employees regarding seeking and post Government employment.</p>
<p>1) Those filers who did not receive annual training it was due to extended medical & military leave, detail, resignation and retirement. 2) Beach head members were appointed to positions in other bureaus or departed DOI. All received IET.</p>
<p>24. (cont'd) employees left before receiving training, extended leave including medical and military deployment. Budget constraints restrict travel to receive training. Part 6.: Many components require annual ethics training for all employees regardless of their financial disclosure status, whether they are an attorney, or whether they received IET.</p>
<p>24. NGA trains 100% of new employees within 30 days of start. This number is classified. 26. answer is no 27. none were excluded 34. NGA trains all employees. The total number of employees in our agency is classified as is the number of our filers.</p>

24. VA Chief of Staff mandates annual ethics training for all VA employees. 24c. Many new entrants hired late in the year may receive IET in 2018.

24. We continue to face challenges in accurately collecting initial ethics training completion reports via SkillSoft online due to lack of computer access by many employees. The distribution of the CDs containing the training and written materials that followed our OGE inspection greatly enhanced our ability to reach employees worldwide. We will be engaging with Human Resources this year to develop additional methods of tracking completion of training. 41. Our office takes advantage of the opportunity and provides ethics training at every conference gathering of store personnel held at DeCA HQ.

24: Due to a change in the applicable regulatory language regarding initial ethics training, the response includes only new employees of the agency, and not detailees assigned to the agency. In previous years, this response included all detailees assigned to the agency. 28 and 29: The question regarding the annual and initial ethics training requirements and the head /deputy head of the agency is inapplicable because these individuals fall under the primary responsibility of a different agency's ethics program. 34: The number employees listed requiring annual training includes both agency employees and detailees assigned to the agency who file financial disclosure reports with the agency. The number does not include detailees assigned to the agency who filed financial disclosure reports with their detailing agency.

25. Cont. However, the FTC's Ethics Team followed-up with the Human Capital Management Office and subsequently determined that requirements are being addressed.

27. We provide new employee ethics training to all new employees, regardless of grade level. 28 and 29. We do not have a Deputy Head but rather a 3-member Board (including the Chairman). We currently have one vacancy. Both the Chairman and the one Board member completed annual training in 2017. 31. We primarily use a self-paced web-based video that NCUA developed with an outside contractor several years ago. 36. and 37. The vast majority of our filers received their annual training through a satellite broadcast videoconference (webinar). The webinar was interactive so those that could not view it live viewed it on-line at a later date. 40. Our Procurement Office is now doing some training on conflicts. Although they do the training themselves, ethics staff reviews the training beforehand and answers questions as they arise.

28 and 29. For purposes of Ethics Program administration, the Office head is the Chief of Staff to the Vice President and the Deputy heads are the Deputy Chiefs of Staff to the Vice President. 24. and 34. Although not included in above numbers for reporting purposes, OVP provides initial and annual ethics training to all OVP employees, including detailees and assigned personnel from other agencies. The reported number of confidential filers include Senate-paid employees.

34. The employees required to file confidential financial disclosure reports that did not complete their training by December 31, 2017 were new employees who entered federal service with OIG between the dates of November 1, 2017 and December 31, 2017. In accordance with the Government Ethics Education guidance (5 CFR 2638.304), new employees must complete initial ethics training within three months of their appointment. OIG new employees are required to complete the interactive annual ethics training module within three months of their appointment. Completion of the annual ethics training module within three months of their appointment counts for both initial and annual ethics training. Those new employees not completing their annual ethics training by December 31 were employees whose appointment dates

<p>were in Nov and Dec 2017 and whose three month due date for initial ethics training fell in Jan and Feb 2018. 41. OGC provided ethics briefing during the DoD Supervisor's Course.</p>
<p>34. There were 8 OGE-450 filers that were unable to attend ethics training due to extended periods of medical/maternity leave. The designated ethics officials abroad have plans to train those that return to post upon their return.</p>
<p>34. Two were on convalescent leave during the whole period live sessions were offered and three were within thirty days of their termination dates, so their attendance requirement was waived.</p>
<p>41-Hatch Act training by Office of Special Counsel</p>
<p>All employees of the EOP must receive annual ethics training. And, pursuant to a decision we reached and implemented in 2017, all OMB employees who do not file a 278 must file a 450, with a few minor exceptions for administrative staff. Therefore, I left the 450 fields blank, above, and indicated the balance of employees who are all required to receive training. We had nearly perfect compliance with this requirement. For those who absolutely could not attend the in-person training sessions in the auditorium, and who also could not attend the final make up sessions in the fall/winter, we provided a video of the training and asked that they watch during business hours to reach us with questions and also confirm when complete.</p>
<p>Distributed "All Employees" memos on high interest topics as well as periodically included Trust Ethics Tips in CEO's weekly "All Employees" email.</p>
<p>Q#24 One component that has numerous remote field offices reported access issues for IET including access to email systems, as well as PIV card/badge issues. Q#34 - A substantial number of those employees who have not completed their AET are SGE advisory committee members who have not participated in committee-related matters or meetings in over a year. Other employees either left the department before taking the training or are on extended medical leave, terminated, or on detail to another agency.</p>
<p>Q. 24 - (cont'd) pay for academic studies. Q. 34 - (cont'd) before Dec. 31 (one took in Jan 2018) The other SGE will take training before their first meeting. 450 - 14 did not complete training by Dec. 31, however, 13 completed in Jan. 2018 and 1 will complete upon returning from a leave status in Feb. 2018. 2 on extended medical and 2 on extended military duty (these are split between 450 filer and Other). All will complete when they return.</p>
<p>Q. 28 The former Director left the agency mid-year and the Acting-Director is the DAEO. Q 34 One confidential filer left before the end of the calendar year and therefore did not receive annual training.</p>
<p>Q.24 - Majority (over 8200) were due to system error at one DDAEO component. The error was fixed and employees required to complete the training in January 2018. The remainder were due to a variety of reasons, including extended leave, deployments, etc. A few are delinquent and ethics officials are following up with supervisors. Q.25 - Agencies/commands that are serviced by HR from another DAEO agency/department did experience issues in obtaining confirmation. Only one component did not receive and they are already working with the servicing organization to correct. Q26. - This varies by DDAEO component. Those that are having others provide IEO received certification, except as noted for Q.25 above. Q34. - Discrepancies primarily due to filers departing prior to end of year, extended leave,</p>

<p>deployments, etc. For those who were delinquent, the activity took corrective action to administer training in early 2018. Q41 - Some DDAEO activities require AET for all personnel.</p>
<p>Q24. We completely revised IET to create an interactive computer-based system. Implementing this system in the first part of 2017 took longer than we anticipated. Once program was implemented in April 2017, all enrolled employees have completed training in a timely manner.</p>
<p>Q24: Two employees did not receive timely at one bureau due to a lingering technical issue that has since been resolved. At another bureau, a processing error (now resolved) resulted in employees not receiving notification to take new employee ethics training. For the latter, all but 4 of the 29 other employees came from other federal agencies they all received written ethics guidance prior to onboarding, including the 14 Principles of Ethical Conduct, an ethics do's and don'ts handout with examples and explanations, and ethics contact information. Moreover, all but one employee received annual training in 2017. The one employee who did not was a P/T student hire who will take annual training by February 2, 2018, when he is on duty. Q30: to complete training requirements within 30 days. Q34: up training to six employees one bureau pursuing an employee excluded because of admin error. At HQ, an add'l 71 PSCs (not included in this #) rec'd training & use OGE 450 for filing See Part 7</p>
<p>Q24-The ethics office continues to follow-up with new hires who have not yet completed required initial ethics training. Q34 - Actual numbers are provided to cleared OGE personnel as necessary.</p>
<p>Q28: CEQ had no agency head in 2017. Its senior agency official completed IET and annual training. Question 34: While CEQ has 13 employees in 2017, it conducted ethics training for detailees, IPAs, and interns.</p>
<p>Q34 - Some employees were on leave, some offices gave late notification of new hires, and a few employees did not respond timely.</p>
<p>Q40: Each year NEH provides ethics training to all staff, whether they file financial disclosure or not. Q41: We also routinely provide one-on-one ethics training to staff on an as-needed basis as questions arise. NEH also sends subject-specific monthly emails on various ethics topics to all staff.</p>
<p>Qs 39, 40, 41 - Provided training to all USADF personnel working at USADF's HQ in DC (including contract employees), locally-hired personal services contractors working at USADF's Field Offices in Sub-Saharan Africa, and to local employees of USADF's partner organizations in Africa which have been awarded cooperative agreements with USADF.</p>
<p>Question 24 a.- Answer is CLASSIFIED. Question 25 - Answer is CLASSIFIED. Question 26 - Answer is CLASSIFIED. Question 27 - Answer is CLASSIFIED. Question 31 - In addition to those required to take annual training, all Agency personnel are invited, but not required, to attend annual ethics training. Similarly, all employees can take the web-based training or watch the video of the annual training. Question 34 - Table: All Answers are CLASSIFIED.</p>
<p>Question 34. One employee was on extended medical leave and will comply with the requirements in Feb. 2018. Three employees retired before the annual training date. Question 35. The NRC does not have any Executive Schedule Level I or Level II employees. Question 36. Includes Commissioners who are Level III</p>

<p>employees. Question 38. Vendor-supplied training. Question 39. Training was made available to other employees who wanted to take the training, and some employees took advantage of the opportunity.</p>
<p>Question 34: One public non-executive filer was on parental leave six confidential filers were on extended leave or on detail to another federal agency. Four confidential filers did not respond to the ethics office's notices. Questions 35, 36 & 37: We provided live annual ethics training to filers grouped by the office in which they work, and tailored the training to ethics issues that might arise specifically for those groups (based on job duties, interactions with the public, etc.). We also continued to enhance our live trainings through the use of response clickers which allowed the attendees to provide immediate feedback throughout the training. Question 41: Within the agency, we provided specialized training focusing on the Hatch Act Training on Social Media, Politics and Government Employment as well as training on Public Commentary in the Workplace and the Hatch Act.</p>
<p>Question 34: Some employees departed the agency before completing training some employees were non-responsive and referred to supervisor for assistance in obtaining completion several employees were out of the office for extended periods of time and unable to complete training (medical leave, deployed) and some personnel did not complete the training in 2017, but completed the training in early 2018.</p>
<p>Question 41. All TVA employees are required to take annual ethics training. Contractors are strongly encouraged, but not required, to take the training. TVA Supervisor/Managers and Officer/Executive-level employees are required to take an additional module as part of the online annual ethics training.</p>
<p>Questions # 28, 29 & 34: Due to the retirement of the Commission's ADAEO, the ethics program was significantly understaffed throughout half of CY 2017 and the agency focused on conflict identification and resolution. The ethics program did require that all confidential filers complete annual training in 2017. One of the eleven confidential filers who did not complete training left the agency prior to the end of 2017, and the ethics program will work with management to ensure that the ten remaining confidential filers complete the required training in the next 30 days. The ethics program will also prioritize and provide ethics training to all public filers in the first part of 2018.</p>
<p>Re: Question #41, Supervisors and Outstationed Bank Examiners received their own specialized annual ethics training sessions.</p>
<p>The IAF provides ethics training to all personnel. This is based on a desire to ensure awareness of ethical rules and responsibilities among the IAF team, and to encourage a spirit of openness wherein all staff know that they can and should speak with the DAEO or ADAEO on any question related to ethics.</p>
<p>The Office of Ethics provides ethics training to all employees in the Office of the Inspector General (OIG). #24- We are working to determine how many took IEO outside of the 90 day window but do not have that info currently.</p>
<p>The response to Question 34 included three SGEs that fit under the exception provided under 2638.307(d)(2).</p>
<p>There was a five month gap between DLA's Ethics Counselor leaving and the new one coming on board. Several personnel helped support the program, but the oversight of the program lost some continuity. This accounted for the annual training not reaching all OGE 450 filers.</p>

We train the whole agency on our Supplemental Ethics Regulations
When I provided NEO training, I included detailees.
White House Ethics officials provide additional and customized ethics training to individuals, offices and personnel within EOP including: interns, job units, spouses of senior officials, volunteers, etc.
With respect to question 24 above, the agency modified its training materials for SGEs as of 5/30/2017. As such, please note that 487 SGEs received ethics training using the newly revised materials and 128 SGEs received ethics training using materials that were in place prior to 5/30/2017. The revised training materials contain the following items in addition to substantive ethics information: (1) a letter from the DAEO explaining the ethics program at the agency and (2) a self-guided ethics quiz. The revised materials were developed in accordance with 5 CFR 2638.304 and administered to all SGEs utilized at the agency after 5/30/2017. The 128 SGEs who received ethics training prior to this date received all the substantive ethics training but did not receive the letter from the DAEO and the ethics quiz since those items were still in development by the agency at that time.

42. From the list below, select the three topics that your employees most frequently sought guidance on in 2017. Other (specify) **Q42 Table**

Agency Supplemental Ethics Regs
Did not receive questions for advice on any other topics.
Former administration officials re: post-government employment restrictions
Official speaking engagements
Seeking employment
Speaking Engagements
Widely-Attended Gatherings (WAG)

43. Has your agency ethics program implemented any of the following practices? Check all that apply. Other (specify) **Q43 Table**

The Office of Ethics published an Ethics Guide Booklet for all USDA appointees and supervisors.
Workload tracking system, brown bag staff sessions, and monthly email reminders to filers.
Specific ethics inbox for advice and one for financial disclosure.
Most ethics advice is memorialized.

General rule: Two sets of eyes on all advice and counsel.
At one bureau, quarterly reminders to: (a) managers to notify subordinates when the employee is...
We maintain an electronic chron archive which can be searched by subject matter and individual.
SharePoint - Assignment tracker and central records management.
Believe agency specific ethics questions were included in the 2017 fed. employees viewpoint survey
We maintain a confidential,limited-access electronic folder for all ethics program records.
Ethics team tracks 450 filers' reports.

45. How do you make employees aware of the availability of post-employment counseling?
Specify Other. **Q45 Table**

Ethics articles are posted monthly to our Agency's TV and Dateline News site
DSS OGC Ethics/Standards of Conduct webpage on the agency intranet and verbal notice by DAEO/ADAEO.
Newsletters / Intranet / DoD required PGE certification for public filers.
Notification on department intranet site and one-on-one exit briefings
Intranet site, handout materials and brown bag post employment sessions.
Website, broadcasts/newsletters.
One on one counseling with senior departees. Post-government info is posted on DOJ websites
DOL Ethics Newsletter
Periodic Department Notices, Use of Ethics Website, and Termination Certification Statement
Ethics Newsletter and other outreach endeavors website/intranet guidance.
Exit Briefing
FDIC has a Seeking Employment/Post Employment pamphlet that incorporates FDIC specific restrictions.
Ad hoc contact by telephone, email or in person.
Internal ethics website and ethics reminders on digital display boards throughout the agency
one-on-one meetings, telephone meetings, vetting of prospective employees.
Website, checkout sheet
Standard template advice

Materials, which include a webcast and other helpful written materials, are posted on our intranet.
DAEO letter to higher-level employees leaving the government that outlines applicable restrictions.
Internal agency website and announcements at component staff meetings
PBGC Intranet
Exit ethics opinion

46. If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q46 Table**

#46 1 PAS filer needs to submit termination report See below in comments, additional information
1 NE NCS got ext 1 NE SC got ext 2 T NCS didn't do 1 T CS not due 4 T SC didn't do 1 T other got ext
Annual career report not yet filed by employee and Termination career report not yet filed
Collection efforts are continuing for outstanding reports.
Currently working to get termination reports from two former employees.
DAEO gapped for over 9 months so overview of ethics program was intermittent, 1 non-senior PA was notified late (1/18) and two PAs left before term report notification was sent. Notifications for termination reports are being sent out first full week of February.
Discrepancies are due to illness, extended leave or other inability.
Discrepancies between Integrity's annual data extract and management reports field report variances.
EPA has ongoing efforts to compel 3 filers to complete their required reports.
FAA had four filers on extended sick leave.
Four termination/combo reports and one new entrant need to be collected.
Integrity extract, outstanding deadlines have not passed.
Integrity numbers shown above do not reflect our understanding. Our records indicate full compliance
Late filing fee notice was sent to one filer & awaiting response from a bureau for 2 filers.
New entrant received delayed notice due to admin. error. Late termination filer has been notified.
Not applicable.
Numbers above are percentages rather than actual numbers.
One (1) filer passed away prior to filing.

One bureau inadvertently forgot to notify a term filer of the 278e requirement report now rec'd.
One filer failed to file before the end of their grace period in 2017.
One filer filed shortly after the new year, while the other filer is still working on the form.
One individual was slow to respond to requests to file a termination report then had log-in problems
One Sch. C appointee did not file an annual 278 because she was on medical leave she then left NEH.
One Schedule C employee failed to file a termination report upon his resignation.
One Schedule C filer departed the agency and refused to file a combined annual/termination report.
One service member failed to file a NE report timely in 2017.
Please see attached document for an explanation of the discrepancies.
Short-term politicals and terminees not always interested in reporting despite agency best efforts.
Technology problems transferring FDOonline between hosts one Schedule C termination 2017-2018
The OGE 478 is not due till May 2018 therefore not required to file as of Dec 31, 2017.
Three termination reports were not received by 12/31/17. See comments below for full explanation.
Two employees have failed to file term report. Agency taking remedial action.
We are working to get 278e reports from nominees by reminding them of their obligation to file.
We have no PAS or non-career SES 2 Other are IG and DAEO both are GS-15s
We reached out to the small number of former filers to remind them to complete Termination reports.

56. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply. Other (please specify) **Q56 Table**

In the case of our Executive Director, our Chairman would be notified as well as the DAEO.
Referral to Office of the Inspector General
Restrict official travel, suspend IT and email until report filed.
Assess late filing fee.
#56 Referral to HR for possible disciplinary action

offer to work one-on-one with filer, and provide data entry support.

Notify Administrative Officer.

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. **Part 7 Table**

#43 -- The Office of Ethics created a new USDA Ethics App available to all employees on any smart phone by searching "USDA Ethics" in any smart phone App store. The Ethics App contains a written Ethics Library and a Video Library as well as FAQ's and resources to contact for more information. The Office of Ethics also created 19 short Ethics videos available to all employees on USDA's Office YouTube page. All 19 USDA Ethics YouTube videos can be found at:
https://www.youtube.com/watch?v=KcLsORzX7bk&list=PL8wgGeKVh_7fhd7xoGqSmd7HxwiJtgtCS

#45 - The Ethics Unit developed post employment guidance letter templates for the 4 categories of departing employees that are used Corporation wide by all deputy ethics counselors.

44. This number includes notification statements of negotiation or recusal from OVP detailees and assignees.

Part 6 comments continued: Note: Treasury IGs are not paid under EX but are counted under Non-Executive Schedule. Q39& Q40: Yes for most bureaus. Q41: All agency personnel were targeted at several bureaus. Q43: required to file an OGE Form 450 (e.g., promotion to a covered position or detailed for 60 or more to a covered position) and (b) public filers of their obligations under the STOCK Act for transaction reports and section 17(a) notifications and recusals. Q43: Almost all advice is memorialized.

Q42 - In surveying across DDAEO agencies/commands, Gifts and PGE were tied as the most frequent with Financial Disclosure and Outside Employment/Activities tied as the second most frequent topics.

Q43. Some ethics advice is provided orally and not memorialized.

Question 42. The Agency requires all employees to request Agency approval before engaging in outside activities. An officer from the Agency's Ethics Law Division reviews all of these requests and provides guidance on each. Question #44 - The answer is CLASSIFIED.

Question 42: There is a tie for 3 place "Outside Employment/Activities"

Question 45: The written and oral guidance delivered to departing employees as part of offboarding process informs them that the ethics office continues to be available to them for ethics advice post-employment, and we regularly receive questions from former employees.

Questions 43 and 45 - These answers reflect what HUD ethics officials have implemented.

We discuss Rule 207 in our in-processing and Annual training. Additionally, we send an email with a 207 memo to terminating employees and meet with them in person while we out-process those employees.

56. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply.

In the case of our Executive Director, our Chairman would be notified as well as the DAEO.
Referral to Office of the Inspector General
Restrict official travel, suspend IT and email until report filed.
Assess late filing fee.
#56 Referral to HR for possible disciplinary action
offer to work one-on-one with filer, and provide data entry support.
Notify Administrative Officer.

58. Which system does your agency use? Other ONLY (*specify below*) **Q58 Table**

FDOnline

Integrity AND Other (specify below)

Army FDM for 450s.
Army Financial Data Management (FDM) System for confidential financial disclosure reports.
Developed an electronic 450 system.
DoD/Army Financial Disclosure Management (FDM)
e-filing of OGE 450 @HQ only
Ethics Management and Tracking System (EMAT) for OGE Form 450, 450A, and CFTC Form 185.
Ethics Management System
FD Online
FD Online
FDIC's National Employee Ethics Tracking System serves as a 450 and other FDIC specific reports e-filing system.
FDM
FDM
FDM

FDM
FDM
FDM
FDM (Financial Disclosure Management)
FDM at www.fdm.army.mil
FDM for 450 filers Integrity for 278 filers.
FDM for OGE450 filings
FDM for some military filers.
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline
FDonline - used only for OGE 450 filings
FDonline for confidential disclosure filers.
FDonline is used at FAA.
FDonline, CBP HRBE.
FDonline.
FDonline.
FDonline/HRWorx
FDS - Confidential Disclosure Forms (OGE Form 450 and 450A.
Financial Disclosure Management (FDM)
Financial Disclosure Management (FDM)
Financial Disclosure Management (FDM) Electronic Filing System

Financial Disclosure Management System
For 450 the paper copy is still being used since the use of integrity is not working.
Hard copy form
In addition to Integrity, IMLS uses FOnline (HRworx) for its 450 filers.
Integrity and FDM.
Integrity for public filers, SharePoint for confidential filers.
Integrity only for public financial disclosure. U.S. Marshal's Service and ATF have e-filing systems for confidential financial disclosure, but are unable to report or project costs in the way being asked here.
NASA's Ethics Program Tracking System (EPTS)
NIH Enterprise Ethics System (NEES), Ethics Program Activity Tracking System (EPATS), Army Financial Disclosure Management System (FDM) and Electronic Financial Disclosure System (EFDS).
NSF eFile System
OA also uses the excel OGE278e forms for appointees whose OGE 278e do not have to be reviewed by OGE.
Other is a CIA-specific tracking program.
Our agency uses the CIA's electronic financial disclosure system for OGE 450 & 278 filers.
Senate eFD
SharePoint database for 450/Confidential Filers
The Army's Financial Disclosure Management System (FDM)
The U.S. Army's Financial Disclosure Management (FDM) system.
We use an in-house e-filing system for OGE Form 450 filers.
FOnline

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. **Part 8 Table**

46 2 Non-career employees need to submit termination reports. #46 6 Career employees were moved into higher graded position, but not advised to submit New Entrant Reports. At the time of this report, 4 have submitted their overdue reports. 1 Career employee had an extension until January 17th to submit termination report. 2 Schedule C employees need to submit termination reports 1 employee was notified after December 31, 2017 to submit a termination report. #52 This number represents requests for multiple reports

<p>#45 - Includes temporary promotions to 278 filing position for > 60-days. #47 - The Corporation Human Resources Information System (CHRIS) provides notification to the ADAEO and Ethics Unit staff when an existing employee is promoted into a public filing position. The HR Office notifies the ADAEO when a new employee from outside the agency is selected for a public filing position. The administrative staff in each division and office include the ADAEO and Ethics Unit staff on all terminations including public filers.</p>
<p>#46 - We were notified on January 30, 2018 that the Agency hired two employees in our Office of Congressional and Public Affairs as Schedule C appointments in 2017. We will be requesting an exclusion under 2634.203 because these employees are not involved in policy making and their basic rate of pay is less than 120% of the minimum rate of basic pay for GS-15 of the General Schedule.</p>
<p>#46 Two of the 22 Schedule C reports were filed with other agencies.</p>
<p>#48: Four of the filing extensions were requested so that a combination annual/termination report could be filed. Two filers who received an extension for this reason ultimately filed separate annual and termination reports.</p>
<p>#52 - There was one request for 6 reports as part of a routine annual audit of the Office of Financial Management.</p>
<p>#54 - A reorganization within an IMLS resulted in re-designation and the promotion of two employees. These new designations were not known by the ethics office until our end-of-year ethics assessment. Once identified, the problem was brought to the attention of HR and the notification process was corrected.</p>
<p>#54 Two notifications were not timely because of a programming issue with the HRM bi-weekly report of agency actions. Bug has been fixed.</p>
<p>46. NCUA is outside of the SES we have an equivalent system called the SSP (Senior Staff Positions). However many of our filers identified themselves as Career SES instead of Other on the 278 form in Integrity. I have counted them all as Other for purposes of reporting here. I will instruct our filers to identify as Other so that Data Extract will match reporting here in future years. 50. The Annual Data Extract in Integrity lists 7 extensions and 1 fee waiver for 278Ts. I went into Integrity and reviewed all 278Ts. I found only 6 extensions and no fee waivers.</p>
<p>46. The number of filers is classified. All filers completed their filing in 2017. 59 I-L. The number of NGA filers is classified. 60. NGA uses Integrity for OGE278e and OGE278-T filings and FDM for OGE450 filings.</p>
<p>46. Three termination reports were not received by 12/31/17. Two have been received in January 2018 and are not late as the filers did not leave until December. One filer was not assigned a termination report prior to leaving in August. Once we discovered our error in December 2017 we mailed him a copy of his termination report to complete and return to our office, which we received in January 2018.</p>
<p>47. DOJ HR offices provide this information directly to DDAEOs and ethics officials, not to the DAEO. 54. Generally, yes, although sometimes there are delays, such as when filers serve in covered positions in an acting capacity, or when filers are promoted into covered positions. 55. Some components utilize intermediate-level review. 59.(a-h)Costs cannot be reported in this manner. 59.(i-j) All public filers file in Integrity. At year end (December) 2017, there were 1400 public filing positions in the Department, some of</p>

<p>which were vacant. 60. All public filing is in Integrity. US Marshals Service and ATF have e-filing systems for confidential financial disclosure.</p>
<p>47. The ADAEO is typically notified although there have been several occasions where notice was not provided timely or at all. The system has improved lately, especially after someone was hired in Human Capital Management to specifically address senior staff/Executive concerns.</p>
<p>48. USAF has no SGEs in Integrity system. 54. Late notice due to administrative oversight.</p>
<p>57-Integrity only for PAS. All other employees file by paper.</p>
<p>58. OVP had 5 Senate public financial disclosure filers in CY2017.</p>
<p>59 (k)(l), OA no longer has an electronic sharepoint filing system for 450 filers.</p>
<p>59. a-i: NA 60. Public Financial Disclosure (OGE Form 278e) Periodic Transaction (OGE Form 278-T)</p>
<p>59.g. and h: These are estimates.</p>
<p>60. OGE Form 278e (I was not able to check the above box). We do not pay to use Integrity.</p>
<p>The termination filer had an extension and filed before expiration of the extension in 2018. The second termination filer is still within their extension period. The new entrant filer was granted an extension but has since filed (within the extension period).</p>
<p>Comment to Question #46: In 2017, DSS had one Senior Level OGE-278 filer who left the agency and was not required to file a termination OGE-278 report because he assumed a covered position with another Executive Branch agency within 30 days of leaving his DSS position. Additionally, another DSS Senior Level OGE-278 filer was promoted in 2017 to a vacant SES billet. The Senior Level position that the promoted filer left was not filled in 2017 and is currently vacant. Comment to Question #59i: DSS had one Annual OGE-278 report filer who submitted a paper form in 2017.</p>
<p>Detailed public and confidential filers filed paper reports. #52 There were 2 requests for 3 employees reports.</p>
<p>For Question 59d and 59f, the cost was recorded as zero as FAA cannot estimate total FY18 projected costs or amt to be paid to a non-federal vendor at this time due to ongoing deliberation of whether to accept FDOonline contractor's desire to move the application to the Cloud.</p>
<p>I and J are estimates based on both Administrations and career staff. K is the number of 450 filers who have now filed pursuant to our phased roll out, and 500 is the high estimate of total 450 filers who will enter the regular filing cycle in July 2018, following the phased roll out and the adjusted due date approved by OGE given our Agency's budget season which makes February filing very difficult.</p>
<p>Many of the members of our agency's board are the heads of other federal agencies. They file their financial disclosures at their home agencies. Since their home agencies handle the collection and review of their filings, their numbers are not reflected here.</p>
<p>Q#55 -- OIG performs intermediate review of financial disclosure forms filed by OIG employees</p>

Q. 46. Integrity does not provide a search function on filer category. "Other" column represents reported required/filed by Non-Career/Career SES, Schedule C, and other appointment types.
Q. 54 - When a 450 filer was detailed to a position requiring a 278 financial disclosure report, the system was not automatically notifying the detailee to file a New Entrant 278. This has been addressed and NASA is monitoring the fidelity of the corrective actions. Q. 59 (i & j) includes periodic transaction forms filed electronically. Q. 59 (k & l) include the alternate forms and SGE 450 forms filed electronically.
Q.53- Some DDAEO agencies/commands use and some do not. Q60 - Integrity users file 278-T electronically.
Q46 - Actual numbers are provided to cleared OGE personnel as necessary. Q59-The Agency only uses Integrity for those reports required to be certified by OGE (DAEO & PAS employees).
Q46: in the box for additional comments to describe discrepancies, the form only allowed a very short response, so the explanation above is incomplete. The Schedule C employee who left NEH without filing an annual 278e at the May deadline (because she was on medical leave), did file a termination 278e when she left the agency in July.
Q55: Yes for 2 bureaus. Q59i & j: refers to Integrity for all of Treasury Q59k: HQ only Q59l: if more bureaus implement e-filing Q60: All of Treasury uses Integrity currently only HQ uses e-filing for OGE 450.
Q59(g): Internal cost reflects a one-time cost for Authority to Operate (ATO) security work for FDOnline.
Question # 54 - DAEO was made aware of all new employees who were required to file a new entrance form except for one in 2016 whom we were not aware was an SES and didn't file until 2017.
Question # 59 g and h - The dollar figure represents the cost of the current FTE salary
Question #46-Answers are CLASSIFIED. Question #47-HR notifies Ethics Law Division of pending terminations. Appointments at very senior grades are rare and track informally without a formal notification from HR. To the best of our knowledge, all new filers from public filing positions are being captured through this informal process. Question #48-Answers are CLASSIFIED. Question #49-Answers are CLASSIFIED. Question #50-Answers are CLASSIFIED. Question #54-Ethics Law Division is promptly notified by HR of all new promotions to SIS. As set forth in the explanation to question 47 above, appointments at very senior grades are rare and are tracked informally without a formal notification from HR. To the best of our knowledge, all new filers from public filing positions are being captured through this informal process. Question #59, e-l - Answers are CLASSIFIED.
Question #59: The CFTC does not track Federal employee costs associated maintaining EMAT, the electronic financial disclosure filing system. Therefore, CFTC Ethics is only able to provide actual and estimated costs for contractor expenses related to electronic filing. Additionally, for line "l" the number of confidential financial disclosure filers projected to file electronically in FY 2018 is significantly lower than those who actually filed in 2017. This is a direct result of a CFTC review of current confidential filers against the standards for identifying confidential filers set forth in 5 C.F.R. Part 2634.904. Upon conclusion of the review, the CFTC determined that many employees currently identified as confidential filers do not meet the requirements as defined in Part 2634.904, and will not be asked to file the OGE 450 in 2018. However,

those employees will be asked to file the CFTC Form 185 Certification of Compliance with the Commission's Conduct Regulation.
Question 47: In one instance, the Office of Human Capital did not notify the Ethics Office of an internal move of an employee from a public filer position to a non-filer position. Question 59(g) & (h): The \$100,000 cost is an estimate.
Question 54. Timely notification was not provided by HR for Schedule C filers. This has been corrected and the Office of the Assistant General Counsel (Ethics) receives notifications prior to onboarding of Schedule C employees.
Question 59(l) includes one filer who filed a termination 278 during FY 2017 and one filer whose 278 information was transferred to a different agency when she transferred to that agency during FY 2017.
Question 59: Due to the transition of FDOonline from NTIS (federal agency) to a non-federal vendor in FY2017, TVA made payments to both a federal agency and a non-federal vendor.
Questions #47 and #54: The ethics program was both understaffed in 2017 and did not receive timely notification from the Office of Human Resources of all personnel changes so the ethics program could not timely notify filers of filing obligations. The ADAEO and the Director of the Office of Human Resources will collaborate on the best way to effectively and timely share such information going forward.
With regard to Question 54, the DFAS ethics program is already taking steps to ensure timely notification of new entrant filers, working with both Human Resources and other stakeholder organizations to develop a robust notification system for New Entrant Confidential Disclosure Report filers.

61. If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q61 Table**

- Filer recently went acting in a 450 position and the Ethics Team just found out.
1 - military leave 8 reconsideration requests, 3 filed in grace period after 12/31/17
2 employees have failed to submit their 2017 Annual OGE-450 reports.
24 Delinquent filers non-responsive to notices to submit reports & some on extended leave
28 extensions = OGC not notified of new entrant filers 2 = annual filers
3 filers were on extended admin leave and could not file, 1 new filer submitted late report in CY18.
51 reports due by December 31 not yet submitted most were assigned in November 2017
Agency underwent reorganizations and previous filers were no longer required to file
Alt forms: 848 filed by 307 employees in Antitrust, 5723 filed by AUSAs in their assigned cases.

DAEO gapped for over 9 months so overview of ethics program was intermittent. Agency has reached out to filers to get the employees to file their CY2016 reports.
Discrepancy resulted from employee separation, extended leave, employee details, promotion & retirement.
Employees on extended leave (sick/military)
Employees were ill or unavailable.
extended leaves of absence
Extenuating circumstances, employees on military duty, leave due to administrative action/illness.
Field reporting variances reasons vary by location.
Filers departed agency, ignored requirement, extended leave of absence, and failed to notify filer.
Filers' email addresses were not updated in FDM.
Likely this is product of supervisors not managing the changes of their personnel.
Nine employees retired throughout the year
Numbers provided are percentages rather than actual numbers.
one employee on extended leave.
One filer was on extended medical leave.
One filer was, and has been, on extended sick leave.
Outstanding reports are either on extension or are pending filing.
pending new entrant reports, medical exceptions
See Additional Comments below.
Separations/Extended Medical Leave/SES Promotions
Some extended leave. Remainder delinquent - ethics counsel continues to follow up.
Some filers departed before filing their reports, some on extended leave.
There were six New Entrant reports due before Dec. 31 that were not filed until January 2018.
Three employees left the agency.
Three filers were on extended sick leave. The remaining discrepancy may be a system reporting error.
Two employees on military deployment, one AWOL, and one not captured as new entrant.
Two filers who started in 11/17 did not receive filing notices until 1/18 due to admin oversight.

Two were not filed because they were detailees and left before completing the form.
We had one filer who filed the wrong form by 12/31 - she has since filed the correct one.

63. What steps do you take to collect delinquent confidential financial disclosure reports? **Q63**

Table

Notify DAEO.
See below.
Notify contracting officer.
Restrict official travel, suspend IT and email access until form filed.
Referral to HR for possible disciplinary action. The employees in #61 have both been referred to HR
notified Executive Assistants of Senior Deputy Comptrollers
Notify the Administrative Officer.
notify Admin Officer
Partnership with HR to emphasize importance of submitting reports

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. **Part 9 Table**

#59 - NTIS is no longer hosting FDOonline. As of 2018, IMLS will contract with HRworx to host the FDOline electronic filing system for its 450 filers.
61 - The number of filers includes both agency employees and detailees assigned to the agency who filed financial disclosure reports with the agency. The number of filers does not include detailees assigned to the agency who filed disclosure reports with their detailing agency.
61. Reasons for failure to file include left DOJ prior to filing, extended leave, military deployment, long term overseas assignment, admin notification error. Pending filing is being pursued and addressed.
61. The number of NGA filers is classified.
61. This number includes Senate-paid personnel.
62. We granted all of our 450 filers a 12-day extension (until 2/27) due to problems with FDM - electronic filing system. FDM was unavailable to us for about 10 days during the filing period. We granted 9 additional short individual extensions after that.
63. no reminders required this year.

DFAS historically does not have delinquent filers, in part because we provide repeated reminders to filers and, ultimately, their supervisory chains, of the filing requirements and impending deadlines.
Q #61 - The discrepancy in the number of reports required to be filed and the actual number of reports filed is due to agency transfers, medical leave, and being placed in emergency response status before filing.
Q62-Actual numbers are provided to cleared OGE personnel as needed.
Question #61-Answers are CLASSIFIED. Question 62-Answers are CLASSIFIED. Question 63 (Other) - Notify appropriate component attorney. Notify Office of Procurement Executive for procurement personnel.
Question 62. The answer to the question reflects extensions requested by filers. The agency experienced difficulties related in part to the electronic filing system that it uses for 450 and 450A reports, resulting in additional de facto extensions. All reports have been received and reviewed. Additional procedures have been adopted to minimize recurrence of these issues in the future.
Reminders to the filer were sufficient to have filer submit their report

65. Number of individual remedial actions taken because of information on a new entrant, annual, or termination public financial disclosure (OGE Form 278e) report in 2017. Other not listed (specify). **Q65 Table**

502 Authorizations
Disqualifications
ethics counselor issued caution notices

75. Which individual(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) with OGE? Specify Other. **Q75 Table**

Ethics Administrator, Naval Criminal Investigative Service, Headquarters, Quantico, VA
OIG - Office of the Legal Counsel files this form for SID if they make the request
The Director of DEO, the IG, the FBI, and General Counsels all have authority to notify OGE
A criminal investigator or other authorized personnel within the Office of the Inspector General
Treasury Inspector General for Tax Administration
Associate Inspector General
Department of Commerce (providing ethics support services)
Defense Criminal Investigative Service (DCIS)

Deputy ethics official working in TVA's Office of the Inspector General

ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds. **Part 10 Table**

#69 - 208(b)(1) waivers will be sent to OGE upon submission of the OGE Annual Questionnaire.
#74 This number represents input from HR and the IG's Office #76 The IG has not indicated whether it submitted the OGE Form 202
64-67 In 2017, there were 17 public filers that executed 46 recusals. While we do track the actions for filers (OGE 278 and OGE 450 Filers), and non filers, we do not track whether the action was a result of a financial disclosure or 278-T review. We have worked hard to create an ethical culture at USAID (live training to thousands of our employees stationed around the world, filers and non filers). We train our employees to recognize potential conflicts of interest so that we can address these issues at inception. Although some of our remedial actions may have been the result of financial disclosure, or periodic transaction reviews, the majority of these actions were executed as a result of issues brought to our attention following ethics training.
64-67. Specific individual remedial actions taken by filers based on information disclosed on their financial disclosure reports are not counted or tracked like this. EOUSA Q64 and Q66: While attorneys have divested or recused because of conflicts of interest, it is not necessarily because of the filing of a 278 report but rather through ongoing conflict of interest monitoring by the attorney and by the office. EOUSA Q65: For PAS US Attorneys, recusals normally occur as a result of information collected during the confirmation process, including the nominee 278.
74. Individual has been indefinitely suspended due to security clearance issues
74c. The one referral was made late December 2017 and declined by DOJ in January 2018. That is the 1 noted in both 74b. and 74c. above. 74e. The IG Report on this same case is currently pending. 74f. The referral was declined by DOJ as noted above. 75. The General Counsel is the DAEO. 76. The first 2 parts of form 202 have been submitted to OGE by NCUA's IG. The third part will be submitted once IG the Report is complete.
76. no required referrals.
For Question 68, the waiver was to a professor at the Merchant Marine Academy - a long-standing waiver that we have communicated to OGE in the past allowing the employee to accept small royalty payments for a textbook the employee authored which is used at the Academy. For Question 72, the two Subpart G actions involved misuse of position - one in which an employee asked a contractor to hire the employee's family member and the other in which an employee misrepresented his capacity when facilitating a meeting between a non-federal entity and another employee regarding a P3 proposal. For Question 74, we believe the agency is still determining whether to take disciplinary action.
HUD OGC - Remedial actions are tracked for PAS employees

Q #71 We compile and transmit waivers to OGE on a quarterly basis. Accordingly, the number of waivers transmitted to OGE in 2017 includes waivers granted during the 4th quarter of 2016 and the 1st, 2nd and 3rd quarters of 2017. Thus, the number of waivers transmitted to OGE in 2017 differs from the number of waivers granted during 2017. Two 208(b)(3) waivers were issued in late 2017 and will be forwarded to OGE shortly.
Q64-67: Zero for most bureaus others don't track
Question # 72 - Ethics Program does not track as the Agency IG is the responsible entity for investigations allegations of based wholly or in part upon violations of the Standards of Conduct provisions (5 CFR part 2635). Question # 76 - IG confirmed there were no reports requiring referrals to the Department of Justice of potential violations of the criminal conflict of interest statutes (including 18 U.S.C. §207) in 2017.
Question 69: The CIA does not provide copies of the waivers because the substance of those waivers is classified and/or the information is protected by Section 6 of the CIA Act of 1949.
Question 74.e. Employee retired.
Question 76 - The Deputy Ethics Official working in TVA's OIG did not submit the referral and disposition of the referral to OGE via OGE Form 202 Notification of Conflict of Interest Referral. The OIG's investigation did not result in an adverse finding of the potential violation of 18 U.S.C. §205.
Questions 64 & 67: We work closely with public filers concerning their financial disclosure reports, and public filers have taken remedial actions based on our ethics advice due to information contained in a new entrant, termination, transaction, or annual report. We do not track specific numbers.
We didn't have any referrals

77. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service (SES), Schedule C, etc.) appointed to or by your agency from January 1 through December 31, 2017? Please type comments in the box below. **Q77 Table**

1 carryover PAS signed current administration pledge.
All of the above.
The current Inspector General was appointed on January 9, 2017.

78. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2017, and indicate the number who did and did not sign the Ethics Pledge. If for any field above you are unable to provide a complete response, please explain in the box below. You may also add additional comments. **Q78 Table**

2 political appointees signed ethics pledges with another EOP component before moving to OA.
As of 12/31/2017, all current employees had signed the pledge. 7 employees transferred to the WH Office from other agencies. 13 employees left during the early days of the Administration without signing the pledge. Two employees left within a month of arriving without signing the pledge. The remaining two employees transferred to other federal agencies. One transferred USAID and the other transferred to OPM.
One of the Schedule Cs who was appointed in December 2017 had previously signed the Ethics Pledge upon her appointment earlier in the year to another agency as provided in 79. below. She had no break in service and provided a copy of her signed Pledge to us.
One schedule C appointee started on 12/27/17 and signed the pledge after 12/31/17.
Only appointees appointed to our agency are included in this count (not detailees).
Schedule C Executive Assistants, Confidential Assistants, and Press Assistants are nonpolicy-setting employees, exempt from the Pledge.
The "Other" category is comprised of OVP's Senate-paid employees.
The Inspector General was an Obama appointee who signed the Obama Ethics Pledge-Executive Order 13490.
The non-career appointees signing the Ethics Pledge were "Other" appointed under the temporary Schedule C authority and either left federal service or transferred to another agency before being converted to a permanent Schedule C position at DOE.
There were also 2 holdover employees who were also required to, and did in fact sign the ethics pledge.
Three non career SES signed the Pledge late.
Two Schedule C employees are administrative staff and are not required to sign the Ethics Pledge.
We had one Obama Administration political appointee who was a 'hold-over' for over 100 days into the new Administration who also signed the Trump Pledge. She was not appointed in CY2017, but did sign the Trump Pledge in 2017. Also, all political appointees who are not PAS are reflected as non-career SES, above.

We were notified on January 30, 2018 that the Agency hired two employees in our Office of Congressional and Public Affairs as Schedule C appointments in 2017. We immediately asked these employees to sign the Ethics Pledge.

79. For each appointee who did not sign the Ethics Pledge, find the appropriate rationale(s) and indicate the total number of appointees who fit into that category. If other, explain here. You may also use the box below to provide a complete response or to add additional comments.

Q79 Table

2 political appointees signed ethics pledges with another EOP component before moving to OA.
All 2017 appointees signed the Ethics Pledge.
As of 12/31/2017, all current employees had signed the pledge. 13 employees left during the early days of the Administration without signing the pledge. Two employees left within a month of arriving without signing the pledge. The remaining two employees transferred to other federal agencies. One transferred USAID and the other transferred to OPM.
employee left agency before signing the ethics pledge
Employee transferred immediately to White House.
Individuals initially appointed under a temporary transition authority and then converted to a permanent position are counted in the category of the permanent position.
One appointee may have signed the Ethics Pledge in 2017 but no copy was found in agency files. Subsequently, an Ethics Pledge was collected from that person. An Ethics Pledge has also not been found for another appointee who served for a limited time in 2017. One PAS was appointed to a Term position prior to January 20, 2017.
One PAS and one schedule C left the agency without signing. One schedule C converted to a non-Pledge signing position. Four schedule C have yet to sign the Pledge.
The employee was appointed to a non-career SES position on or about January 23, 2017. At that time, the employee was not asked to sign the Ethics Pledge. When this omission was discovered, the employee was asked to sign the Pledge. In lieu of signing the Pledge, the employee was removed from the non-career SES position and appointed to a General Schedule position
The Inspector General was an Obama appointee who signed the Obama Ethics Pledge - Executive Order 13490.
These employees hold a non-policymaking position. However, because we were informed of their Schedule C on January 30, 2018, we have not yet asked OGE to exclude these individuals from the filing and pledge requirements.

These two appointees signed the pledge at a previous agency and re-signed the pledge at GSA.
We had one appointee come from the Department of Labor and another appointee come from the Department of Agriculture having already signed the Ethics Pledge at those agencies.

80. How many appointees appointed between January 1 and December 31, 2017 and subject to the Ethics Pledge were registered lobbyists during the two years prior to their appointment? Please type comments in the box below. **Q80 Table**

DON'T KNOW
employee did not learn of status as registered lobbyist until discussions w/ADAEO. Employee left agency shortly thereafter.
Information not available.
One of the newly appointed PAS officials was a lobbyist. However, we have incomplete information on other appointed Non-career and Schedule C employees.
We would have addressed with them during initial training and financial disclosure review but we did not track the number of individuals who fell into this category.

81. Section 3 of Executive Order 13770 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted; the names of individuals granted waivers by your agency in 2017; and which of the Pledge paragraphs were implicated. If other, please explain here. Other comments may also be provided in the box below. **Q81 Table**

#79 1 Non-career employee came from another agency when she had already signed the ethics pledge #79 1 Schedule C employees did not sign the pledge, but has left the Department #79 1 Schedule C employee did not sign pledge due to being exempted from filing based on non-policy making duties Names of those who received waiver: Heather Norby, Jonathan Wachtel, Margaret Dougherty, Terry Branstad, and Edward McMullen
Derek Kan was granted a waiver by the White House to allow him to participate in matters involving Amtrak after serving on Amtrak's Board prior to his appointment to DOT.
In addition to the waivers noted above, a 5 C.F.R. 2635.502(d) waiver also provided to one employee
Para.6 waivers given to EOP appointees relating to news organizations, WHO Commissioned officers relating to covered political orgs., and former Jones Day employees in certain circumstances. All waivers were published on the White House public website. WH also issued 5 C.F.R.2635.502(d) authorizations.

90. Does your agency have written policies or procedures for designating SGE status? Not applicable (specify why). **Q90 Table**

We have an OLC opinion stating that all non-government ACUS members (voting and non-voting) are SGEs
SGEs are statutorily designated.
By statute, all public Board members are SGEs.
SGE status granted by Presidential appointment.
Our SGEs are designated by statute.
The Udall Foundation's enabling legislation designates all members of the Board of Trustees as SGEs
Designated by law.
Designation of SGEs determined by using guidance provided by OGE and pursuant to 18 U.S.C. §202.
OGE classifies Commission Members as SGEs.

91. Does the written policy or procedure include consultation with the ethics office? Not applicable (specify why). **Q91 Table**

By statute, all public Board members are SGEs.
Designation of SGEs determined by using guidance provided by OGE and pursuant to 18 U.S.C. §202.
MCC does not have a written policy for SGEs.
No written policies/procedure for designating SGE status, but HR may consult with ethics office.
No written policy
NO WRITTEN POLICY
No written policy.
Our SGEs are designated by statute.
See #90
See above.
See comments below.
SGEs are statutorily designated.
Some questions are not applicable to the Commission
The enabling legislation identifies the SGEs

The Presidio Trust Board of Directors ethics policy includes consultation with the GC and DAEO.
There is no written policy.
We do not have written policies/procedures. We have not needed to make SGE designations in decades.
We don't have a written policy or procedure for designating SGE status.
We have no written procedures

92. How many SGEs serving on a board, commission, or committee were required to receive IET by December 31, 2017? **Q92 Table**

6 appointed after committee's 1st meeting. 10 appointed in late Nov/Dec haven't attended a meeting.
6 members of one board not present at first meeting. Other two were scheduling conflicts.
92. Unknown. Air Force Ethics Office provides training on request IET not tracked.
All 3 SGEs have been sitting on the Committee for multiple terms, so they do not need IET
For those SGEs that received IET after the first meeting, they did not participate in that meeting.
MCC did not have any new SGEs for 2017.
Numbers provided above are percentages. actual numbers provided to cleared OGE personnel as needed.
One member did not complete training before Dec. 31.
Resources and personnel are insufficient to timely administer IET training.
See comment below for additional information.
The 6 individuals are SGEs, who received notification of the annual training requirement on 12/5, 12
They are not in-house so we provide a training sheet, guidelines, and brief them by phone.
Two SGEs requested and were granted an extension.
When all appointments are filled there are 13 SGEs, including three ex officio.

93. If yes, which office provides the training? **Q93 Table**

Consultant
DAEO
DAEO

DAEO
DAEO, Office of the Solicitor
DOE, Office of General Counsel.
Ethics (Counsel's Office) + OGE online training for SGEs
Ethics and Appeals Division
Ethics Attorney from the Office of General Counsel or the Office of the Chief Counsel.
Ethics Division
Ethics Division
Ethics Law and Programs Division
Ethics office
Ethics Office
Ethics Office
Ethics office responsible.
Ethics office.
General Services Administration
L/Ethics
Legal / Ethics Office
New SGEs are required to take OGE's on-line training for SGEs. Board meetings include Ethics ann'ly
Office of General Counsel
Office of General Counsel
Office of General Counsel, Ethics Specialty Team
Office of Human Resources and IMLS General Counsel/Ethics Office
Office of the General Counsel
Office of the General Counsel
Office of the General Counsel
Office of the Secretary ethics officials or Operating Administration ethics officials
OGC

OGC Ethics Division and Agency Components' Ethics Offices.
OGC Ethics office
OGC, Ethics Office
OPIC's Ethics Advisor trains civilian members of the board.
OPM Learning Connection
Servicing ethics office.
The Office of the General Counsel, which also serves as the Ethics Office.
The USDA Office of Ethics

94. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2017 and the number of reports actually filed by December 31, 2017. If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. **Q94 Table**

Unable to get one SGE to file.
Two file at other agencies. The third did not perform work for the FSLRB in 2017.
The Volpe Center had two intermittent employees who were inactive most of the year and then left.
Some individuals, despite repeated notifications, failed to submit their OGE 450 reports.
See comment below for additional information.
See Additional Comments for Part 12 below.
See Additional Comments Below.
Person responsible for collecting 450s for SGEs retired in 2017. We cannot locate 450s for 3 SGEs.
One member of the board of directors has not yet filed his report.
One bureau is in pursuit of the report, although panel did not meet in CY 2017.
One advisory member has not responded to communications, but is anticipated to be dropped from the committee without participating in further duties. The other SGE who has not filed the 450 is in a long term medical status. She attended a meeting mid year when the training was given, but a medical condition prevented her from filing the OGE 450 form in September when due. If she is able to continue committee obligations, she will file her OGE 450 before further participation.
Numbers provided above are percentages. Actual numbers provided to cleared OGE personnel as needed.
Insufficient resources to follow up in timely fashion, plus delays in compliance.

A regional subcommittee did no work in 2017 and there were coordination problems with others.
3 non compliant 8 in grace period reports were not due until 12/14/17
1 resigned from committee.

ADDITIONAL COMMENTS FOR PART 12. Please indicate the question number to which the comment corresponds. **Part 12 Table**

92 These three new board members received ethics clearance and initial ethics orientation materials in # 94 J William Fulbright Scholarship Board DFO was recently notified of requirement for members to submit financial disclosure reports and obtain ethics training.
#89 & 94- All re-appointments of TRAC members were frozen pending a review by the Deputy Secretary of Defense. TRAC members are appointed at the DoD level and are not considered DTRA SGEs.
#92: Currently, the CFTC does not have any SGEs serving on a board, commission, or committee. The CFTC's SGEs provide consulting services to various CFTC office divisions.
#94 In 2017, there were three(3) FACAs. Two(2) disbanded by the end of 2017.
85. This number includes an individual who was appointed on June 23, 2017 but resigned on July 3, 2017 prior to the first meeting on July 19, 2017. 94. The Vice President and Christy McCormick, Commissioner of the U.S. Election Assistance Commission, were public financial disclosure filers at the time this FACA was formed on May 11, 2017.
92 - 95 The FACA Committees in Office of Justice Programs have charters which require them to provide high-level broad policy advice such that funding issues/concerns necessary to trigger the confidential filing requirement do not arise for the members.
95. Unknown.
96 & 97 The VA Advisory Committee Management Office does not track non- advisory committee, board or commission members. Most VA SGEs are advisory committee members.
All of our SGEs receive IET. The answer to #92 is because none of our SGEs are hired to serve on a board, commission, or committee.
no SGE filers.
Postal Service didn't have any SGEs in calendar year 2017.
Q #94, For some committees there were no meetings in 2017 and members did not submit reports, a large number are inactive SGEs that do not have committee assignments and are not performing services for the Government. Other FACA SGEs were recently appointed and are still in the process of completing reports. Q #95, It was determined pursuant to 5 CFR 2634.904(b) that the services provided by SGEs in two components are unlikely to directly and predictably affect any of their individual or imputed financial

interests. Moreover, HHS has determined that the nature of their official duties makes remote the possibility that [they] will be involved in a real or apparent conflict of interest.
Q 94. EEOC's SGE program has been placed on hold pending implementation of new procedures to ensure, among other things, that required 450s are filed in a timely manner.
Q85: This number reflects the members of NEH's two advisory committees chartered under FACA. The Humanities Panel, which reviews grant applications, had 655 members during 2017. These individuals are not SGEs and typically serve only one day during the year for NEH. NEH's other advisory committee is the National Council on the Humanities which currently has 21 SGEs (one member resigned in July 2017), and one full-time employee (the Chairman of NEH, a PAS). Q89/Q94: Please note that one SGE resigned her position mid-year, which is why we required 22 SGEs to file financial disclosure reports, but only 21 SGEs were in place as of 12/31/17.
Q87 & 89- Numbers are reported as percentages. Actual numbers are provided to cleared OGE personnel as needed.
Q88: No SGEs for most bureaus Q89 vs Q94 numbers differ because 2 SGEs departed before 12/31/17.
Q89 & 95 - Significant increase due to addition of National Language Service Corps, which DDAEO component had previously excluded from SGE numbers due to misunderstanding.
Question 85: TVA's two FACA committees are comprised of 20 members each. However, due to subtractions and additions to both committees, there were a total of 35 members as of December 31, 2017 - 18 on one and 17 on the second.
Question 91. The vast majority of our SGE employees are reservists. The remaining are committee or board members and experts. HR processes established require contact with ethics office prior to appointment.
Question 94: Two former members of PBGC's non-FACA advisory committee were hired as SGE consultants to the committee in September 2017. In September 2017, automatic OGE Form 450 notifications were coordinated in PBGC's FDonline electronic filing system. However, it was recently determined that due to technical failures the notice was not timely received by the two SGE consultants. They are scheduled to file OGE Form 450s in January 2018.
Question 95: This number is imprecise because there were 98 SGEs in 2017, but the old reporting regime only required filing if they attended a plenary session. Technically, the number should be "up to 98."
Regarding Q. 83. EXIM is required by charter to have 2 advisory committees but they are inactive due to the lack of a quorum of the Board of Directors.
Response to Question 86 and 87 refers to the Atomic Safety and Licensing Board Panel (ASLBP), a non-FACA adjudicatory board consisting of administrative judges. Consistent with the NRC's response to Question 86 in our response to the 2017 Questionnaire, our response to Question 70 in the 2016 Questionnaire should have identified 1 non-FACA adjudicatory board.
Response to question 89 indicates those SGEs currently on board as of 12/31/2017.
The ODNI does not have any Special Government Employees

ADDITIONAL QUESTIONNAIRE COMMENTS. Additional Comments Table

<p>#94 All SGEs will receive written ethics guidance tailored to SGEs and will be required to complete the OGE online ethics training for SGEs prior to being designated or re-designated as SGEs. They will also be required to notify the Department in writing that they have completed the training. This information will be entered into the Financial Disclosure Tracking Database. For members of Federal Advisory Committee Act (FACA) advisory committees, we intend, whenever possible, to supplement that interactive training with live ethics briefings at committee meetings. The ethics attorney assigned to oversee this program is in touch with the designated federal officers (DFOs) of Department FACA committees that have SGEs and is working with the DFOs to ensure SGE members receive ethics training and that required financial disclosure reports are submitted.</p>
<p>ACUS has never had an IG.</p>
<p>ADDITIONAL COMMENTS FOR PART 6 Question #34: Of the 213 OGE 278e filers required to receive annual ethics training in 2017, eighteen (18) OGE 278e filers left the CFTC prior to the end of the calendar year, and two (2) were on extended leave during the time when training was offered. Similarly, of the 465 OGE 450 filers required to receive annual ethics training in 2017, thirteen (13) OGE 450 filers left the CFTC prior to the end of the calendar year, and three (3) were on extended leave during the time when training was offered. Finally, one (1) CFTC Form 185 filer designated to take annual ethics training in accordance with 2638.307(a), left the agency prior to the end of the calendar year and was not present during the time when training was offered. ADDITIONAL COMMENTS FOR PART 8 Question #46: Of the 15 Nominee/New Entrant filers in the Other category, two filers were required to file New Entrants reports in 2017, but failed to do so because they were not notified of the filing requirement. This error occurred due to an undetected coding error in the Human Resources reporting tool that caused the CFTC Ethics to fail to identify the promotions that changed the filing status of the employees from confidential to public filing positions. Question #47: CFTC Human Resources consistently provides CFTC Ethics with notice of accessions and separations. Additionally, we receive notice of promotions that change the filing status of employees. However, near the end of the calendar year, Human Resources experienced an undetected coding error in the reporting tool that caused the CFTC to fail to identify promotions that changed the filing status of some employees from confidential to public filing positions. As a result, CFTC Ethics failed to timely notify two filers of the OGE 278e filing requirement. However, for three other promoted filers, CFTC Ethics was able to grant filing extensions. As those promotions occurred at the end of the calendar year and the new entrant reports will not be due until 2018, those filers will be included as new entrants in the 2018 Agency Ethics Program Questionnaire.</p>
<p>Additional IGs: TIGTA: J. Russell George SIGTARP: Christy Romero</p>
<p>DeCA does not have an Inspector General.</p>
<p>IMLS does not have an Inspector General but can obtain services from the Inspector General of the Smithsonian Institute.</p>
<p>In February 2018, the agency will relocate to the following address: Federal Election Commission Sentinel Square II 1050 1st St. NE Washington, DC 20002</p>
<p>It is important to note that any question eliciting numbers of filers would require classified answer.</p>

Letters to the agency head should be addressed to both Deputy Directors: Scot Beckenbaugh and John Pinto.
No CHCO or IG
OSC does not have a designated Inspector General.
Selective Service doesn't have an IG
Some questions are not applicable to the Commission
Thank you!
The Agency does not have an Inspector General. The Agency has an Office of Professional Responsibility.
The DOT/OIG has jurisdiction with the Board to the extent provided for in 49 U.S.C. 1326 -- authority of the Inspector General.
The Trust has no Inspector General.
We do not have a CHCO or an IG.
We have no IG
While there is no place to input it electronically, when you print this document it asks if OGE has a copy of the DAEO and ADAEO's designation letter. OGE has a copy of both.

Addendum

This report was revised on August 29, 2018 as follows:

Footnote 1 was updated to include questions number 92 and 94.

Question 24 was corrected to indicate that agencies were asked to include (not exclude) SGEs in the number of employees who were required to receive Initial Ethics Training (IET) by December 31, 2017.