
UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

Fiscal Year 2014

Explanatory Notes and Annual Performance Plan

Prepared for the Committees on Appropriations

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UNITED STATES OFFICE OF GOVERNMENT ETHICS

Mission Statement

The United States Office of Government Ethics (OGE) exercises leadership in the Executive Branch to prevent conflicts of interest on the part of government employees and to resolve those conflicts of interest that do occur. In partnership with Executive Branch departments and agencies, OGE fosters high ethical standards for employees and strengthens the public's confidence that the government's business is conducted with impartiality and integrity. OGE's mission directly supports the President's goal of responsibly governing the Nation.

Fiscal Years 2013 and 2014 Priorities Overview

OGE has identified and developed strategies to accomplish three budget priorities during fiscal years 2013 and 2014. Each priority supports long-term goals set forth in OGE's strategic plan of strengthening the ethical culture within the Executive Branch, preventing conflicts of interest, and promoting good governance.

OGE's budget priorities for fiscal years 2013 and 2014 are to:

- Interpret, implement, and advise on ethics laws, policies, and program management;
- Harness technology to promote transparency, education, and oversight; and
- Ensure effective communications to enhance understanding of ethics laws, policies, and program management, and promote transparency, education, and oversight.

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Section I – Purpose

A. About OGE

The United States Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978 (EIGA), provides overall direction, oversight, and accountability of Executive Branch policies designed to prevent and resolve conflicts of interest. OGE is also charged with promoting high ethical standards of conduct for Executive Branch employees. Specifically, OGE: promulgates and maintains enforceable standards of ethical conduct for approximately 4 million civilian employees and uniformed service members in over 130 Executive Branch agencies and the White House; oversees a financial disclosure system that reaches more than 28,000 public financial disclosure filers and over 325,000 confidential financial disclosure filers; ensures that Executive Branch ethics programs are in compliance with laws and regulations; provides education and training to the more than 5,700 ethics officials; conducts outreach to the general public, the private sector, and civil society; and shares good practices with, and provides technical assistance to, state, local, and foreign governments, and international organizations.

OGE's greatest resource is its multi-disciplinary staff of attorneys, ethics and finance experts, and support staff. OGE is a very lean organization, with fewer than 82 full-time equivalents (FTEs), and accomplishes its Executive Branch-wide responsibilities by organizing cross-functional teams to perform such diverse tasks as working with Presidential nominees for appointments requiring Senate confirmation to resolve potential financial conflicts of interest, training Executive Branch ethics officials, and enhancing oversight of Executive Branch ethics programs. OGE's three long-term strategic goals are described below.

B. Long-Term Strategic Objectives

OGE's budget priorities for fiscal year 2014 support the three goals set out in OGE's five-year strategic plan. The daily work of OGE is driven by performance measures under the objectives established for each of these goals:

Strengthening the ethical culture within the Executive Branch: OGE strives to improve the effectiveness of ethics policy, enhance assistance to and oversight of agency ethics programs, increase employees' awareness of their ethical responsibilities, and increase OGE's focus on senior officials' roles in implementing ethics programs.

Preventing conflicts of interest: OGE supports the President and the Senate in the Presidential appointment process and, through its nominee public financial disclosure program, resolves potential conflicts of interest for Presidential nominees for appointments requiring Senate confirmation (PAS nominees), monitors compliance with conflict of interest laws, implements and oversees an effective public and confidential financial disclosure system, and reviews the ethics programs of Executive Branch agencies.

Promoting good governance: OGE supports and cooperates with federal, state, and local agencies implementing programs that help support good governance; engages in outreach to the

public sector, private sector and civil society; and supports United States foreign policy anti-corruption and good governance initiatives.

C. New Statutory Requirements: STOCK Act Implementation

On April 4, 2012, the President signed into law the Stop Trading On Congressional Knowledge Act of 2012 (STOCK Act) (Pub. L. 112-105). The STOCK Act established significant new requirements for the Executive Branch ethics program, ethics officials, and the thousands of federal officials who file public financial disclosure reports pursuant to the Ethics in Government Act (EIGA). STOCK Act mandates include:

- OGE must develop and maintain a comprehensive Executive Branch-wide electronic financial disclosure filing system for the branch's approximately 28,000 public filers;
- Employees who file public financial disclosure reports must submit periodic transaction reports within 30 days of receiving notice of a covered financial transaction, or no later than 45 days from when the transaction occurred;
- All public filers must comply with specific notification and recusal restrictions regarding negotiations or agreements for future, non-federal employment within three business days of commencing such negotiations;
- Certain public filers must disclose mortgages on personal residences on their financial disclosure reports; and
- In the future, certain public financial disclosure reports filed may need to be made available to the public on the internet within 30 days of filing.

Beginning in mid-fiscal year 2012, following the STOCK Act's enactment, OGE immediately began the task of implementing its new requirements — a process that significantly impacted and consumed OGE resources across all of OGE's programs and objectives. All of these activities will continue into fiscal year 2014, as will OGE's required implementation of an Executive Branch-wide electronic financial disclosure system. The STOCK Act has and will continue to have a major impact on OGE's budget, program responsibilities, and priorities.

D. Use of Evidence and Evaluation

OGE has long understood the importance of using evidence and evaluation to measure the effectiveness of the Executive Branch ethics program as well as OGE's own program in support of the Executive Branch-wide ethics program. Historically, OGE has used evidence gathered through direct feedback from Executive Branch agency ethics officials and other audiences in written and verbal form. OGE uses all of its mission activities as opportunities to evaluate its effectiveness, including:

- Surveying Executive Branch ethics officials annually to assess their satisfaction with OGE's guidance, training, and overall efforts and to gather data to help maximize the reach of OGE's limited resources;
- Evaluating agency ethics program compliance through gathering information from each agency, such as the number of financial disclosure reports filed by an agency, the number of Department of Justice prosecutions and Inspector General referrals made on ethics-related issues, and the number of disciplinary actions taken on ethics-related charges;
- Collecting written evaluations from participants in OGE's educational courses to ensure that training is effective and useful;
- Surveying Executive Branch ethics officials annually regarding compliance with the Ethics Pledge, as required by the President's Executive Order on Ethics (E.O. 13490); and
- Utilizing agency ethics program reviews to obtain valuable feedback from agency ethics officials about OGE's programs and support.

By fiscal year 2014, OGE will expand use of evidence and evaluation tools within its existing programs. With the deployment of its Agency Information Management System (AIMS), OGE will be able to track guidance sought by and provided to agency ethics officials from over 130 Executive Branch agencies and other organizations. OGE will use this information to identify areas on which to focus its resources, such as particular ethics issues where additional training or other guidance is needed. OGE will also use the metrics gathered on the use of its website, its main communication tool with the ethics community and other stakeholders, to manage its website content and to evaluate other products or information that might be needed to better serve ethics audiences.

The enactment of the STOCK Act in fiscal year 2012 provided and will continue to provide OGE extensive additional opportunities to solicit feedback and examine the effectiveness of its implementation activities. Initially, OGE solicited feedback to evaluate the effectiveness of its programs by engaging hundreds of agency ethics officials directly through meetings and teleconferences to gather input and data as OGE formulated policies and guidance to implement the STOCK Act's provisions. OGE also created dedicated email boxes to solicit and collect questions and feedback from ethics officials. These types of communications will continue in fiscal years 2013 and 2014 as STOCK Act implementation continues. OGE is also planning to survey ethics officials regarding STOCK Act compliance and additional training needs in fiscal years 2013 and 2014.

OGE's most significant evaluation opportunity may come from the STOCK Act requirement under section 11(b) of the Act that OGE create an Executive Branch-wide electronic public financial disclosure filing system – a requirement for which OGE will need significant additional resources to implement. OGE expects that electronic filing will result in better conflicts of interest analysis by ethics officials, more accurate reporting by filers, an enhanced user experience for both filers and ethics officials, and an overall streamlining of the financial

disclosure process. As system administrator, OGE will be in a position to better assess agency ethics programs and monitor compliance. This in turn will allow OGE to evaluate its own effectiveness in advising and supporting agency ethics programs through conducting training, providing advice, and issuing legal and program management advisories.

Section II – Budget Request Overview

A. Budget Request Overview Narrative

OGE is submitting a budget request of \$15,325,000. At this level OGE will be able to comply with its existing and new statutory mandates, including staffing and maintenance of a public financial disclosure electronic filing system, as well as other requirements of the STOCK Act. However, the public search, sort, and download capabilities of the e-filing system required by the STOCK Act are uncertain in light of ongoing litigation and a pending congressionally-mandated study regarding the issues raised by website publication of financial disclosure information.

OGE Requires Additional Staff and Information Technology Resources to Meet New and Ongoing Demands Posed by the STOCK Act

OGE is requesting \$15,325,000 in appropriated funds for fiscal year 2014 to comply with its statutory mandates and responsibilities, including implementation of the STOCK Act. OGE expects that this funding amount will allow it to continue performing its core mission of overseeing the Executive Branch ethics program, and to implement the statutory mandates of the STOCK Act, which was enacted after OGE submitted its fiscal year 2012 and 2013 budget requests. These STOCK Act requirements have not only significantly increased demand for services OGE already provides to the Executive Branch ethics community, they also require OGE to develop, implement, and maintain systems to provide electronic filing for 28,000 public filers across the Executive Branch. To continue its implementation of the STOCK Act in fiscal year 2014, OGE will require the additional \$1.66 million being requested over OGE's fiscal year 2012 enacted budget level to develop, operate, and maintain an electronic filing (e-filing) system as required by the Act, including an increase in permanent funding for professional staff members to support e-filing and the other requirements of the STOCK Act.

Specifically, OGE will use these additional resources to support the technical and staffing requirements necessary to operate, maintain and manage the e-filing system that is currently being developed with the nearly \$5 million anomaly (less the sequester reduction) OGE received in fiscal year 2013. In addition, OGE will require new professional staff members to meet its ongoing statutory missions to provide guidance, develop rules, provide information on, and promote understanding of, ethical standards in Executive Branch agencies, and monitor and review agency ethics programs for compliance. All of these mission-critical functions have increased with enactment of the STOCK Act.

In addition to the unprecedented mandate to develop and deploy an Executive Branch-wide electronic financial disclosure system, the STOCK Act establishes significant new requirements for OGE, as well as for the Executive Branch ethics program, ethics officials, and the thousands

of federal officials who file public financial disclosure reports pursuant to EIGA. These include the requirements that public filers submit periodic transactions reports, comply with specific notification and recusal restrictions regarding negotiations or agreements for future non-federal employment, and (for certain filers) disclose mortgages on personal residences on their public financial disclosure reports.

In summary, the STOCK Act mandates will result in a permanent increase in OGE's baseline budget requirements. In addition, operation costs for e-filing are difficult to predict and may be affected by unexpected occurrences. OGE notes that the costs described above will be ongoing, and may increase depending upon additional STOCK Act mandates and required system upgrades that may be necessary after the e-filing system becomes operational. Moreover, the above request does not cover the costs of developing the capability for electronic publishing of public financial disclosure reports. It is not currently known whether online public access to public financial disclosure reports and periodic transaction reports will remain a requirement of the STOCK Act in light of ongoing litigation challenging the posting requirement and the results of a congressionally-mandated study that is currently being conducted by the National Academy of Public Administration on the privacy implications of online publication. In the event that online publication remains a feature of the e-filing scheme, OGE will need additional funding to meet this requirement. Nevertheless, OGE projects that the over time, the single e-filing system under development will be less expensive to operate, will result in savings government-wide by standardizing and streamlining the financial disclosure process, and will reduce duplicative information technology investments.

B. Budget Request By Object Classification

The object classification table set forth below summarizes OGE’s request (in thousands of dollars).

Table: Budget Request by Object Classification (in thousands)

		2012	2013	2014
	<u>Object Class</u>	<u>Enacted</u>	<u>Enacted*</u>	<u>Request^</u>
11.1	Salaries	\$8,016	*\$8,095	^\$8,605
12.1	Benefits	\$2,084	*\$2,190	^\$2,310
21.0	Travel	\$35	\$20	\$20
22.0	Transportation (Freight)	\$6	\$5	\$6
23.0	Rental Payments to Others	\$1,548	\$1,519	\$1,691
23.3	Communications and Utilities	\$232	\$125	\$127
24.0	Printing and Reproduction	\$15	**\$32	\$11
25.2	Other Services	\$1,556	*\$5,580	^\$2,206
26.0	Supplies and Materials	\$100	\$58	\$105
31.0	Equipment	\$72	\$107	•\$244
99.00	Subtotal	\$13,664	\$17,731	\$15,325
99.00	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$14,389	\$18,456	\$16,050

NOTE: OGE’s current lease expires in fiscal year 2014. This table does not reflect the approximately \$400,000 that would be required if OGE has to move to a new location.

*Includes additional resources for STOCK Act requirements. The “Other Services” category contains the bulk of the resources to develop and procure the required electronic public financial disclosure system. The Continuing Resolution included \$5,000,000 for the STOCK Act (less sequestration of 262,000).

**Increase reflects payments made pursuant to 31 U.S.C. 1353(b) for bills received from GPO for services provided prior to fiscal year 2007.

^ Includes additional resources for ongoing maintenance, operation and staffing of the required electronic financial disclosure system and other STOCK Act requirements.

• Includes \$188,000 for a necessary, total replacement of OGE’s phone system. Due to its age, the hardware and software are no longer supported by commercial vendors.

Section III – Fiscal Year 2012 Accomplishments

In fiscal year 2012, OGE advanced its strategic goals of strengthening the ethical culture within the Executive Branch, preventing conflicts of interest, and promoting good governance by:

- Preparing for the influx of new Presidential appointees following the 2012 election;
- Working to modernize government ethics laws, regulations, and programs;
- Harnessing technology to promote transparency, training, and oversight; and
- Promoting continuity and succession planning in the Executive Branch ethics program.

OGE's accomplishments in fiscal year 2012 toward these priorities are discussed below.

A. Priority 1 – Preparing for the Influx of New Presidential Appointees Following the 2012 Election

OGE plays a vital role in the period following a Presidential election, whether for an incumbent President or for a new Administration. Working with the White House and Executive Branch agencies, OGE reviews the financial interests of all PAS nominees for possible conflicts of interest with their prospective duties. When such conflicts are found, OGE develops remedies so that the President's appointees can carry out their duties free from those conflicts.

In fiscal year 2012, OGE undertook three key initiatives to prepare for the increased volume of financial disclosure reports following the 2012 election: creating a web-based, plain English guide for financial disclosure filers; increasing financial disclosure training for OGE and Executive Branch agency ethics officials; and conducting focused ethics program reviews of agencies to ensure their readiness for the post-election period.

Developed New Tools to Facilitate More Accurate Completion of Presidential Nominee Reports

- During fiscal year 2012, OGE completed the design and implementation of a web-based, plain English guide to educate and assist senior officials required to complete public financial disclosure reports. This user-friendly tool is designed to reduce or eliminate the most common errors found in financial disclosure reports. OGE also updated its manual and templates used by agency ethics officials to draft nominee ethics agreements, and anticipates that it will be issued for use by the ethics community in the near future. Both of these efforts should help reduce the time it takes filers and reviewers to complete the financial disclosure part of the nominee clearance process.

Conducted Increased Financial Disclosure Training for OGE and Executive Branch Agency Ethics Officials to Prepare for an Increased Number of Nominees

- To carry out its Executive Branch-wide mission with fewer than 78 FTEs, OGE employs a multi-functional professional workforce. In fiscal year 2012 many staff members were redirected from other non-election year duties to undertake extensive nominee financial disclosure training. This training was reinforced by hands-on experiential learning through assignment of pending nominee financial disclosure reports.
- To help agencies prepare for new nominees, OGE provided intensive election-year focused nominee financial disclosure training to nearly 300 ethics officials across the Executive Branch. OGE also provided increased training to help agency ethics officials deal effectively with legal and programmatic issues related to appointees leaving government, including rules governing seeking employment and limits on post-government employment activities. OGE provided training to selected agencies focusing on the unique role that leadership plays in establishing and maintaining an ethical organizational culture, and in promoting professional integrity among employees. The training facilitated a dialogue about the importance of promoting the obligations of public service and of having those obligations inform the day-to-day processes and decision-making of the agency.

Assessed Readiness of Executive Branch Agencies' Ethics Programs for the Post-2012 Presidential Election Period

- OGE completed a targeted assessment of post-election readiness of the Departments of Justice, Treasury, and State. These three agencies account for nearly 40 percent of all Senate-confirmed Executive Branch positions. Specifically, OGE determined current capabilities and future planning related to their financial disclosure report processes, and identified potential vulnerabilities that could impair the ability of agency ethics officials to conduct timely, accurate, and consistent conflict of interest reviews. This assessment provided guidance to agency leadership and ethics officials about better ways to structure and to execute ethics programs to provide even more effective service to PAS nominees. It also reinforced the essential elements of a successful ethics program: succession planning, specific and continuous training, and a program structure ensuring accountability.

B. Priority 2 – Working to Modernize Government Ethics Laws, Regulations, and Programs

In fiscal year 2012, OGE continued its ongoing work to modernize government ethics laws, regulations, and programs. OGE dealt effectively with changes it initiated as well as unexpected challenges such as the STOCK Act.

Implementing the STOCK Act

- On April 4, 2012, the President signed the STOCK Act into law, establishing through amendments to EIGA significant new requirements for the Executive Branch ethics program, ethics officials, and the thousands of federal officials who file publicly available financial disclosure reports. During the course of legislative debate on the STOCK Act, OGE responded to more than 65 requests for technical assistance from congressional committee staffs and members, and has continued to provide significant assistance since enactment of the law.
- Immediately following enactment, OGE began preparing to implement the STOCK Act's extensive and unprecedented requirements, a process that impacted and drew upon all of OGE's programs and most of its staff. Within one week, OGE provided policy guidance to the ethics community regarding reporting requirements for periodic financial transactions, mortgages on personal residences, post-employment negotiations and arrangements for future employment, and posting of financial disclosure reports. OGE also engaged Designated Agency Ethics Officials (DAEOs) in numerous face-to-face meetings and teleconferences to assess and address issues raised by the new law. With technical support from OMB's Budget Formulation and Execution Line of Business (BFELoB), OGE also led weekly conference calls with more than 100 agencies to address the Act's requirements for web posting of public financial disclosure reports. Additionally, OGE created training tools for ethics professionals and filers regarding the STOCK Act requirements and established procedures to facilitate technical review of the periodic financial transaction reports required of public filers. Finally, OGE developed a framework and cost estimate to accomplish the Act's mandate of Executive Branch-wide electronic financial disclosure report filing in fiscal year 2014.

Modernizing Other Ethics Laws and Regulations

- In addition to its numerous responses to congressional inquiries on the STOCK Act, OGE responded to over 60 additional requests for technical assistance to the Congress on issues ranging from financial disclosure and the nomination process to post-government employment, gifts, and outside positions. Thus, OGE provided over 125 instances of assistance to Congress in fiscal year 2012, responsibly undertaking its responsibility to promptly reply to congressional requests within OMB guidelines.
- OGE continued implementation of the President's Executive Order on Ethics (E.O. 13490) by publishing the third annual report to the President on compliance with and implementation of the Executive Order.
- OGE published final rules to make qualified trusts more accessible. Such trusts may be established by Executive Branch employees to avoid financial conflicts of interest. OGE also published a final rule to streamline the process for authorizing official participation of Executive Branch employees on the boards of scientific, technical, and other nonprofit organizations that are relevant to agencies' interests.

Modernizing Executive Branch Ethics Programs

- OGE continued the benchmarking program reviews it began in fiscal year 2009, this year focusing on regulatory agencies. These reviews are provided as a service to senior leaders and DAEOs to help them compare their ethics programs with similarly situated agencies, assess potential vulnerabilities, chart and measure improvements, and share model practices.
- OGE developed and tested ethics-related employee viewpoint questions. These questions could promote employee awareness of ethics-related requirements, benchmark perceptions of ethical culture within agencies, and underscore senior leaders' responsibilities for agency ethics programs.

Supporting Ethics Enforcement Activities

- In fiscal year 2012, OGE continued to support programs and activities of Inspectors General (IGs). The Acting Director actively participated as a member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) as well as the CIGIE Integrity Committee, which examines allegations of misconduct against IGs and their direct reports.
- OGE instructors provided training at the Inspector General Criminal Investigator Academy (IG Academy). This training on investigating ethics-related matters and working with ethics officials has become a standard part of the IG Academy's curriculum, and complements a web-based training module that OGE developed for IG investigators.
- OGE experts provided direct support to IG investigators and federal prosecutors in numerous cases on the interpretation and application of the conflict of interest laws and ethics rules.
- OGE also worked with agency IGs and DAEOs on organizational changes to better balance IG independence with strong DAEO support.

Sharing Good Practices and Experiences to Enhance Good Governance

- OGE collaborated with the most senior ethics practitioners from all three branches of Government to meet on issues of common interest, build professional networks, and improve ethics across the federal government. Participants in this OGE-initiated consortium have exchanged information and discussed their experiences on key topics of common interest. The relationships and understandings that these meetings produced benefitted OGE during recent legislative and implementation efforts.
- OGE continued to exchange good governance practices and learning experiences with state and local government entities, international organizations, and the non-profit and

business communities whose integrity programs share elements similar to those of OGE or that have conducted research into innovative and effective ethics and integrity programs. For instance, OGE drew on the research of the Organization for Economic Co-operation and Development in the area of integrity modules to improve its evaluation metrics. This research contributed to OGE's development of proposed integrity questions for employee viewpoint surveys.

- OGE provided technical experts to meet the United States' obligations under the mutual evaluation mechanisms of three international agreements: the United Nations Convention Against Corruption (1st round), the Group of States Against Corruption (GRECO)(4th round), and the Inter-American Convention Against Corruption's Mechanism for Follow-Up on Implementation of the Inter-American Convention Against Corruption (4th round). Evaluations are intended to help those reviewed improve their integrity programs, and have the ancillary benefit of providing evaluators with opportunities to observe good practices useful for their own programs. As evidence of OGE's valued expertise, OGE was asked to help train the evaluators for the GRECO 4th round.
- OGE represented the United States at anti-corruption and good governance meetings of international organizations of which the United States is a member. These organizations include the United Nations Office on Drugs and Crime, the Council of Europe's Group of States Against Corruption, the Organization of Economic Co-operation and Development, the U.S.-China Joint Liaison Group, and the Asia-Pacific Economic Cooperation (APEC). The Department of State's satisfaction with OGE's performance in this area is evidenced by its continued reliance on OGE experts and its funding through OGE's reimbursable account for OGE's travel and program materials used for this purpose.
- OGE took the lead in helping APEC develop Principles for Financial/Asset Disclosure for public officials. Subsequently, those same Principles were endorsed by the G-20, the leaders, finance ministers, and central bank governors from 20 major economies.
- At the request of United States foreign policy agencies, OGE engaged in mutually beneficial discussions with representatives of good governance programs throughout the world by meeting with 51 foreign delegations, totaling 517 persons from 75 countries. Written surveys of participants show that 100 percent of the participants thought the presentation helped them understand the role of OGE and how the Executive Branch ethics program works and 97 percent believed that the presentation helped them understand the larger role of transparency and accountability in the Executive Branch.

C. Priority 3 – Harnessing Technology to Promote Transparency, Training, and Oversight

In fiscal year 2012, OGE continued to leverage technology to improve transparency and increase efficiency in the Executive Branch ethics program and to enhance training and oversight of agency ethics programs. Specifically, OGE implemented a replacement for its deteriorating

Financial Disclosure Tracking System (FDTS) and began development of an Agency Information Management System (AIMS) to more effectively track interactions with other Executive Branch agencies. OGE enhanced transparency by making nominee financial disclosure reports and related documents more readily available online. In addition, OGE implemented an internal electronic audit tracking system to more efficiently manage the review process and share knowledge within OGE.

Analyzing, Evaluating, and Supporting Agency Compliance Activities

- In fiscal year 2012, OGE completed the redesign of FDTS. This redesigned web-based application, which imported legacy data from the old application, gathers comprehensive information about the collection, review, and certification of public financial disclosure reports and other covered documents as required by law. The redesigned application includes new reporting features that will improve OGE's processes for monitoring receipt, review, and retention of required public financial disclosure reports and related documents.
- OGE began development of AIMS in fiscal year 2012, a system being designed and implemented to better track and manage interactions, such as incoming requests for guidance and interpretation from over 130 Executive Branch agencies and other organizations. The AIMS system will provide OGE officials at all levels instant access to ethics program-related information about all Executive Branch agencies. AIMS relies on off-the-shelf technology, is on schedule, on budget, and will be operational in fiscal year 2013.
- OGE identified and disseminated via webinar model practices throughout the Executive Branch and developed training to prepare the ethics community for an efficient and effective post-election period.
- OGE developed an internal electronic audit tracking system to manage the ethics program review process.

Increasing Transparency

- OGE implemented a system to allow the public to electronically request, view, and download public financial disclosure reports and related documents of PAS nominees and Presidential candidates through its website. This system has resulted in a substantial increase in the number of public financial disclosure reports released, and has proven to be an invaluable aid in implementing the STOCK Act. See: <http://www.oge.gov/Open-Government/Presidential-Appointee---Nominee-Records/>
- In collaboration with OMB's BFELoB and the entire Executive Branch ethics community, OGE developed a centralized system through which each agency can electronically upload and publish to a database the approximately 28,000 financial disclosure reports that are required to be publicly available on the internet pursuant to the STOCK Act.

- To meet the STOCK Act requirement of Executive Branch-wide electronic public financial disclosure by October 2013, OGE evaluated existing Executive Branch e-filing systems and prepared a detailed summary of the technological requirements necessary to develop, implement, and maintain the electronic financial disclosure filing system.
- OGE began posting on its website the semiannual reports of non-federal source travel payments accepted by agencies under the authority of 31 U.S.C. § 1353. The new process allows for immediate public access to the reports, thus increasing transparency and improving the efficiency with which OGE provides customer service. See: <http://www.oge.gov/Open-Government/Travel-Reports/Travel-Reports/>
- OGE began posting reviews it has conducted of Executive Branch ethics programs. As a result, over 100 reports, some going back as far as 1982, are now publicly available on the OGE website. See: <http://www.oge.gov/Program-Management/Program-Review/Program-Review-Reports/Program-Review-Reports/>
- OGE created a new Freedom of Information Act (FOIA) web page on its website, and continues to have a 100 percent on-time FOIA response rate. See: <http://www.oge.gov/DisplayTemplates/SectionIndex.aspx?id=47>

Delivering Training

- OGE developed and delivered on-demand and live instructor-led courses directed at ethics officials, IG staff, and Executive Branch employees, including:
 - A self-paced tutorial for filers of periodic financial transaction reports that was viewed more than 700 times in the first month of availability. See: <http://www.oge.gov/Financial-Disclosure/Public-Financial-Disclosure-278/Nominee-and-New-Entrant-278-Guide/Nominee---New-Entrant-278-Guide/>
 - A new, live monthly series of webinars for advanced ethics practitioners highlighting topics of common concern and sharing agency experiences and information.
 - Instructor-led courses – 71 in total – including a series of courses for senior ethics officials on election year preparedness and OGE’s well-received New Ethics Official Certification Program.
- OGE increased the effectiveness of the 18th National Government Ethics Training Conference, held in late fiscal year 2011, by making available in fiscal year 2012 the most popular sessions, based on a survey of attendees, as online videos. The video series has garnered more than 1,000 views on the official OGE YouTube channel. See: <http://www.youtube.com/usoge>

D. Priority 4 – Promoting Continuity and Succession Planning in the Executive Branch Ethics Program

In leadership of the Executive Branch ethics community, OGE prioritized promoting continuity and succession planning in the Executive Branch overall and in its ethics program. This priority included activities to ensure key positions in the Administration are filled and the Executive Branch ethics program continues to develop professional capacity. Highlights of OGE's efforts in fiscal year 2012 include:

Continuity in Senior Leadership

- For most PAS nominees, OGE's financial disclosure program represents their first introduction to the ethics requirements of the Executive Branch. OGE traditionally works closely with nominees as well as with the ethics officials from their prospective agencies and the White House to ensure compliance with all financial disclosure and conflict of interest requirements. These early interactions help to stress the importance of a conflict-free government workplace and to ensure that new appointees understand the importance of the Executive Branch ethics program.
- In fiscal year 2012, due to the ongoing appointment of officials to vacant positions and routine turnover of senior leaders, OGE personnel reviewed and certified almost 200 public financial disclosure reports of PAS nominees. These reviews involved the resolution of financial disclosure issues and the negotiation of ethics agreements. OGE's review and certification of these PAS nominee reports is in addition to its review and certification of approximately 1,100 annual and termination financial disclosure reports of PAS appointees and DAEOs.
- OGE worked with the Federal Election Commission on the review of public financial disclosure reports of Presidential and Vice Presidential candidates to ensure that candidates received OGE assistance regarding the requirements to prepare their financial disclosure reports. OGE also made these reports available to the public.
- OGE completed compliance reviews and follow-up monitoring for more than 50 Executive Branch agencies, focusing on three general areas: micro agencies (agencies with 11-100 full-time employees), cabinet agencies, and post-election readiness. These statutorily mandated oversight activities were enhanced through the use of questionnaires, onsite reviews, and follow-up activities. Ongoing monitoring by OGE ensured that agency programs complied with regulatory requirements, documented essential processes and procedures, and provided support to federal employees.
- OGE assisted two new agencies in creating ethics programs. OGE detailed employees to: train ethics officials and employees, establish financial disclosure policies and procedures, provide advice and counsel to employees, deploy an electronic financial disclosure filing and review system, and conduct reviews of public and confidential financial disclosure reports. OGE also assisted in creating networks of support with established ethics programs at other agencies.

Planning for Succession at OGE

- In fiscal year 2008, OGE instituted a student intern program that now operates throughout the year. During fiscal year 2012, 12 students interned at OGE. This program exposes students to service in the Executive Branch and increases OGE's and other agencies' abilities to recruit highly qualified talent, contributing to succession planning in the ethics field. The success of this program can be measured by the fact that three former interns were hired as junior attorneys at OGE by the end of fiscal year 2012. By selecting from a pool of former interns, OGE decreased dramatically the time required to fill critical vacancies and was able to select from the most highly qualified persons available.
- OGE dedicated significant resources to internal cross-training in order to promote continuity and succession planning within OGE. For instance, an intra-office detail of staff from OGE's international assistance program to the agency program section enhanced OGE's ability to provide international technical assistance and provided personnel to the agency program section during a time of staff turnover. This cross-training of staff gives OGE the flexibility to shift personnel resources as needed.
- OGE management supported employees' professional development goals during fiscal year 2012. OGE used a variety of methods to accomplish this, including: details to other agencies and the White House; entering into a partnership with the Treasury Executive Institute for access to GS-14, and GS-15, and SES professional development programs; manager specific training; personality/managerial assessment, diversity and inclusion programs; and coaching. OGE also continued to host several OGE staff-developed issue forums to keep its employees abreast of developments in ethics laws and emerging issues.

Preparing for Succession in the Executive Branch Ethics Program

- OGE expanded its New Ethics Official Certificate Program, a "boot camp" for those new to the practice of ethics. Participants learn to apply relevant ethics authorities to a series of relevant tasks, assess and discuss the importance of effective processes in the management of an ethics program, and use the tools and resources critical to practicing ethics officials. The program now includes two more certificate programs within the core curriculum of introductory classes.

Section IV – Fiscal Years 2013 and 2014 Budget and Performance Plan Priorities

To support its strategic goals of strengthening the ethical culture within the Executive Branch, preventing conflicts of interest, and promoting good governance, OGE will:

1. Interpret, implement, and advise on ethics laws, policies, and program management;
2. Harness technology to promote transparency, education, and oversight; and

3. Ensure effective communications to enhance understanding of ethics laws, policies, and program management, and promote transparency, education and oversight.

A. Priority 1 – Interpreting, Implementing, and Advising on Ethics Laws, Policies, and Program Management

1. Implement Changes to Ethics Policy and Practice Mandated by Legislative and Regulatory Reforms

Issue programmatic and legal guidance about the STOCK Act

In fiscal years 2013 and 2014, OGE will gather, analyze, and disseminate on its website data regarding implementation of the STOCK Act and make appropriate recommendations for improvement. OGE will gather data relating to volume, timeliness of processing, employee-focused training at the agency level, and compliance with statutory web-posting requirements. OGE will develop targeted training for ethics officials, job aides, guidance, and assessment metrics with a view towards increasing timely compliance with requirements. Benchmarks will be established as a foundation to measure improvements in performance. OGE will track agencies' performance on a semi-annual basis to help OGE and agencies identify issues requiring additional guidance or resources. The reporting framework will further transparency and accountability.

Evaluate the standards of conduct for possible modernizing and streamlining

In fiscal year 2014, OGE will begin reviewing the Standards of Conduct, beginning with the gift rules, for possible revision. The current Standards of Conduct were issued in 1992 and have been largely unchanged since that time. With over 20 years of experience, OGE has observed that no area of the Standards has been the subject of more questions than subpart B, which governs gifts from sources outside the government.

2. Ensure New Presidential Appointees are Free of Financial Conflicts of Interest

OGE plays a vital role in the period after a Presidential election. OGE, working with the White House and Executive Branch agencies, reviews the financial interests of all PAS nominees for possible conflicts of interest with their prospective duties. OGE then develops remedies so that the President's appointees can carry out their duties free from financial conflicts of interest or even the appearance of conflicts of interest.

Review nominee financial disclosure reports for potential conflicts of interest

In fiscal years 2013 and 2014, OGE will review for financial conflicts of interest and certify a greatly increased volume of public financial disclosure reports resulting from the 2012 Presidential election, regardless of the outcome of that election. Based on past experience, the volume of PAS nominee financial disclosure filings will likely double when compared with calendar year 2011. OGE will identify and resolve potential conflicts of interest on the part of the

nominees by establishing written ethics agreements with all nominees prior to their confirmations. In fiscal years 2013 and 2014, OGE will shift its staff resources as necessary to timely review financial disclosure filings and analyze and resolve the potential conflicts of interest of incoming Executive Branch leaders, to provide these incoming leaders an introduction to their new ethical responsibilities as public servants. OGE will also provide departing officials with post-government employment guidance. Results will be assessed based on meeting review priorities determined by the White House and on feedback from potential nominees.

Ensure timely agency reporting of compliance with ethics agreements

In fiscal years 2013 and 2014, OGE will increase the transparency of agencies' efforts to ensure timeliness of ethics agreement compliance. OGE will present training, provide general and agency-specific guidance, and monitor agency compliance. This information will be posted on OGE's website to improve Executive Branch practices for implementing ethics agreements.

3. Improve Executive Branch Agency Ethics Program Management and Professionalism

Refine metrics relating to program management

An important objective of OGE's oversight role with regard to agencies' ethics programs is to identify effective practices and strategies that lead to a successful ethics program. In fiscal years 2013 and 2014, OGE will partner with agencies to select meaningful metrics for addressing the essential elements of a highly successful ethics program. Necessary information will be gathered through the course of OGE's oversight activities, including an annual call for data, as well as on-site, plenary, and issue-focused reviews of ethics programs.

Expand educational offerings for ethics officials and Executive Branch employees

Because of the decentralized nature of the Executive Branch ethics community, ethics officials rely on OGE for essential training and continuing education to remain current and to enhance their knowledge base. In fiscal years 2013 and 2014, OGE will meet the educational needs of the ethics community, regardless of location or experience, by creating a virtual "ethics university" on the OMB Max platform and other means through which OGE will offer: an expanded webinar series for novice and experienced ethics officials, targeted OGE-sponsored classroom and virtual training, and customized training to agencies upon request. To meet the demand for training, which often outpaces OGE's resources (as demonstrated by the fact that most of OGE's instructor-led courses are over-subscribed), OGE will: develop a certificate program for ethics instructors who, upon successful completion, will be qualified to effectively deliver OGE-developed ethics courses in their own agencies and throughout the Executive Branch; and make its educational course, materials and performance-support products available to the Executive Branch ethics community through OGE's virtual university and on the OGE website. With respect to all training efforts, OGE will conduct ongoing assessments to evaluate the usefulness of the information and materials presented, as well as the effectiveness of the methods of instruction.

Formalize commitment to continuous staff professional development through an Employee Development Program

The Executive Branch ethics community relies on OGE to provide timely, accurate, and useful services and products to assist in the daily management of its ethics programs. OGE is committed to continuously improving these services and products, while remaining mindful of the necessity for fiscal responsibility. In furtherance of this commitment, in fiscal year 2013, OGE will launch an Employee Development Program (EDP) to provide time, resources, and organizational support to enhance the professional development of OGE staff. Drawing on OGE's experience and internal talent, this program will maintain and improve upon the high quality of services and products expected of the agency. The EDP will require employees to assess their professional skill level on a semi-annual basis and, in consultation with their supervisors, draft an individual development plan to further improve their professional skills. By building habits of skill assessment and developmental goal-setting, the EDP will establish continuing education as a measurable performance standard and an employee benefit at OGE, all within existing resources.

4. Support the Work of Inspectors General and Prosecutors

OGE will continue to collaborate with the Inspector General community through the Council of Inspectors General on Integrity and Efficiency (CIGIE), its Integrity Committee, and the IG Academy, as well as with prosecutors. The goal of these interactions is to assist IGs and prosecutors in understanding the complexities of the ethics laws and regulations as they relate to ethics-related investigations and how effective ethics programs support enforcement. OGE will measure the effectiveness of these interactions based on both formal and informal feedback from participants.

5. Assist the United States Government in Responding to International Anti-Corruption Reporting Requirements and Good Governance Initiatives

The United States has committed itself to respond to annual and other periodic questionnaires with regard to the steps it has taken to meet international anti-corruption standards. Reporting requirements arise from the United States' participation in multi-lateral groups such as the Implementation Review Group for the UN Convention Against Corruption and the Organization for Economic Co-operation and Development's (OECD) Public Governance Directorate, the Anti-Corruption Working Groups of the Asia-Pacific Economic Corporation (APEC), and the G-20. OGE assists in developing the United States' response to these and other organizations' reporting requirements when the questions involve information on implementation of elements of U.S. ethics and good governance programs. OGE will measure its effectiveness (timeliness, accuracy, and completeness) through feedback from the foreign policy agency responsible for the final submissions.

At the request of the United States' foreign policy agencies, OGE will continue to participate in programs designed to support and enhance the United States' foreign policy initiatives and assistance in the areas of anti-corruption and good governance and to represent the United States in international forums. Programs and forums will include the following:

- UN Office of Drugs and Crime and the implementation of the UN Convention Against Corruption;
- Anti-Corruption and Transparency Working Group of APEC;
- Public Governance Directorate of the OECD;
- Organization of American States' MESICIC;
- Council of Europe's Group of States Against Corruption; and
- U.S.-China Joint Liaison Group's Working Group on Corruption.

In addition, OGE will provide technical experts to meet the United States' obligations under three anti-corruption mutual evaluation mechanisms: United Nations Convention Against Corruption (1st round), the Group of States Against Corruption (4th round), and the Inter-American Convention Against Corruption's MESICIC (4th round). OGE also will continue to meet with numerous foreign delegations sponsored primarily by the Department of State's International Visitors Program to provide information about the United States' implementation of ethics and good governance programs, and will continue to represent the United States in various international forums focusing on corruption prevention and good governance.

OGE will measure its performance in the areas above based on feedback from the United States' foreign policy agencies, recurring requests by these agencies for assistance, and their continued financial support, when necessary, for OGE's participation abroad.

B. Priority 2 – Harnessing Technology to Promote Transparency, Education, and Oversight

1. Implement Executive Branch-wide Electronic Filing of Public Financial Disclosure Reports

To fulfill the STOCK Act requirements for the electronic filing of financial disclosure reports in a centralized database, OGE will implement an Executive Branch-wide electronic public financial disclosure system.

E-filing Data Collection. E-filing will provide a secure, web-based environment for public filers to enter their required financial information instead of completing paper forms. Benefits of the system include: paperless information flow between filers and ethics officials, easier and more accurate collection and processing of financial disclosure information, incorporation of smart information techniques to allow for prepopulation of reports using previously entered information, and an overall enhanced user experience.

Management Utility. E-filing will also benefit OGE and agencies in managing the Executive Branch ethics program by streamlining the financial disclosure reporting process and facilitating improved identification and resolution of conflicts of interest. Agency ethics officials will be able to track in real time the status of financial disclosure filings, thereby increasing visibility of the status of new entrant, annual, termination, and periodic transaction filings. Finally, the e-filing system will be capable of generating real-time reports and statistics related to compliance and efficiency such as the timeliness of the filing, reviewing, and processing of financial disclosure reports.

2. Leverage Technology to Expand Participation in OGE's Ethics Training

OGE continues to explore ways to harness technology to provide ethics officials with information when they need it, no matter where they are located. The vast majority of the approximately 5,700 ethics officials throughout the Executive Branch are located outside the Washington, DC area, devote only a portion of their official time to their ethics program duties, and must quickly master the ethics laws, standards of conduct regulations, and financial disclosure rules. To meet this need, in fiscal years 2013 and 2014, OGE will expand the use of social media, such as YouTube or Twitter, to provide on-demand instruction and guidance; web-based training and other technology-enhanced learning; and self-paced and instructor-led computer based learning. To determine whether OGE is meeting the expanding needs of ethics officials, OGE will rigorously assess the quality of training content and delivery.

Over the last 34 years, OGE has hosted 20 successful national ethics training events. During these events, OGE has reached audiences beyond Executive Branch ethics officials, imparted knowledge in a variety of settings, and provided opportunities for ethics officials to share knowledge, information, and experiences. In fiscal year 2014, OGE will build on the success of its prior events and deliver an Executive Branch-wide training event. Taking advantage of the technologies available, OGE will make portions of the training event available in real time to participants not physically present. Additionally, after the event, OGE will make selected panels, workshops, and classes available on demand.

C. Priority 3 - Ensuring Effective Communications to Enhance Understanding of Ethics Laws, Policies, and Program Management, and Promote Transparency, Education, and Oversight

1. Effective Communications within the Federal Government

Ethics Practitioners in All Three Branches

In fiscal year 2012, OGE organized regular meetings with the most senior ethics practitioners from all three branches of the federal government to meet on issues of common interest and build a collegial professional network dedicated to improving ethics government-wide. The relationships and open lines of communications developed in these OGE-led three branch meetings proved invaluable in reaching common understandings during fiscal year 2012 on emerging issues, such as the STOCK Act. Additionally, these improved lines of communications contributed to a large increase in the number of requests from the Legislative Branch for technical assistance from OGE on issues ranging from financial disclosure and the nomination process to post-government employment, gifts, and outside positions. In fiscal years 2013 and 2014, OGE will continue to promote these regular three branch meetings to deal effectively with, among other issues, the STOCK Act's requirements for development and implementation of electronic public financial disclosure in the Executive and Legislative Branches.

Agency Ethics Officials

Within the Executive Branch, OGE organized an unprecedented number of meetings, conference calls, and webinars with senior agency ethics officials in fiscal year 2012. In addition, OGE began hosting weekly conference calls with approximately 100 agencies on issues related to implementation of the STOCK Act. These communication efforts promoted better understanding of the challenges the law presented to OGE and agencies, and served as an effective forum to identify and resolve issues. Building on this success, OGE will utilize a variety of communication methods in fiscal years 2013 and 2014 to work with Executive Branch ethics officials on continued implementation of the STOCK Act, the process of bringing on board new Presidential appointees, and the development and delivery of education and training.

Executive Branch Employees

In fiscal year 2014, OGE will promote the incorporation of ethics and integrity questions into Executive Branch surveys to raise the visibility of ethics and to establish benchmarks for employee awareness of ethics regulations and processes, as well as employee perceptions of agency-level ethical culture. OGE will encourage agencies to use optional OPM survey questions added at the agency level to target ethics issues.

Federal Groups

Finally, OGE will also focus on effective communication and collaboration with specific federal groups, such as federal advisory committee members, senior managers, administrative law judges, and others within the Executive Branch. Through these interactions, OGE will highlight ethics concerns specific to these and other groups and alert them to any new ethics laws, regulations, policies, or guidance. OGE will measure the effectiveness of these interactions based on both formal and informal feedback from participants/recipients.

2. Effective Communications with Audiences Outside the Federal Government

Through domestic and international good governance outreach initiatives, OGE shares its expertise, keeps abreast of current trends, enhances its own programs, and builds productive connections with those engaged in programs supporting good governance. In fiscal years 2013 and 2014, OGE will continue to actively pursue productive engagement through several avenues.

State and Local Governments

OGE will continue to be an active member of the Council on Government Ethics Laws (COGEL), an organization whose members are primarily state and local government agencies with ethics and other good governance responsibilities. OGE will support training at the annual COGEL conference and respond to inquiries from individual COGEL member agencies. Engagement with COGEL will allow OGE to share its expertise and recent Executive Branch developments and to learn from COGEL colleagues. OGE will measure the value of its involvement with COGEL based on feedback from OGE personnel and COGEL members.

Private Sector Organizations

In fiscal year 2013, OGE will continue its involvement with private sector organizations focusing on ethics, such as the Ethics Resource Center (ERC), a nonprofit, nonpartisan research organization dedicated to independent research that advances high ethical standards and practices in public and private institutions, and the Ethics and Compliance Officer Association (ECO), the largest professional association of ethics and compliance practitioners from the domestic and international private sector, academia, and government. OGE will measure the utility of its involvement with ERC and ECO and others by the extent that these activities lead to innovations in OGE's practices related to training, program management, and performance evaluation.

Associations, Professional Organizations, Watchdogs, and the Public

OGE will also continue to engage with organizations not comprised primarily of ethics practitioners, such as scientific, legal, and other professional associations, the private sector, and colleges and universities. Building on its relationships with civil society good governance groups through meetings and presentations, OGE will continue to engage these groups. This direct, proactive communication ensures professional organizations, non-profit "watchdogs," and, by extension, the general public understand the Executive Branch ethics program and the reasoning behind policy decisions. Conversely, the direct and open contact with good governance groups will help OGE to be transparent and responsive to public concerns. OGE will measure the success of these interactions based on both formal and informal feedback from these audiences.

Foreign Delegations

OGE also will continue to meet with numerous foreign delegations sponsored primarily by the Department of State's International Visitors Program to provide information about U.S. implementation of ethics and good governance programs, and to respond to requests for information and assistance received directly from other countries.

Section V – Improving Employee Satisfaction and Wellness

A. Serving as a Model Employer for Executive Branch Agencies

In fiscal year 2012, OGE took several actions reflecting its commitment to being a model agency. In past years, OGE has surveyed its employees to measure employee satisfaction and has generally received positive responses. In fiscal year 2012, OGE participated in the Executive Branch-wide Federal Employee Viewpoint Survey, achieving an 88 percent participation rate. Based on the results of the 2012 surveys, OGE ranked among the top 12 best agencies to work for in the category of very small federal agencies (fewer than 100 employees).¹

¹ See *Best Places to Work in the Federal Government* rankings produced by the Partnership for Public Service.

1. Improvements in Administrative Services

In fiscal year 2012, OGE:

- Continued to improve administrative support services to employees and to realize operational efficiencies by fine tuning processes and procedures for working with the agency's shared services center, the Bureau of the Public Debt, and developing a more automated system for submitting requisitions.
- Revised its Continuity of Operations Plan and engaged in additional communications testing agency-wide prior to participating in the 2012 national level federal Continuity of Operations Exercise.

2. Creating and Promoting a Positive Performance Culture

During fiscal year 2012, the Acting Director emphasized the role of internal communications in promoting a culture of performance. These enhanced internal communications involved:

- Meeting regularly with the Executive and Senior Staff to discuss agency goals, priorities, and the status of significant program activities;
- Holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff; and
- Conducting several "all hands" meetings with the entire OGE staff to provide clear and direct communication about OGE's progress, priorities, and direction. These meetings were well-received, based on feedback from staff members.

Additional steps OGE took during fiscal year 2012 to promote a culture of performance included:

- Submitting the OGE SES Performance Management System to OPM for re-certification.
- Supporting a wide variety of flexible work schedules and telework consistent with OGE's team environment. Nearly 60 percent of OGE employees participate in some form of flexible work arrangements or telework.
- Issuing a formal policy to accommodate the needs of nursing mothers.
- Issuing a Disability Hiring Plan and a Diversity and Inclusion Plan, both of which received outstanding feedback from OPM.
- Increasing support for the agency's Equal Employment Opportunity (EEO) and Diversity and Inclusion programs. A centerpiece of the EEO program has been 5 agency-wide special emphasis events covering ethnic, racial, gender, and sexual orientation diversity. More than 85 percent of OGE employees have attended one or more of these events.

Survey results from OGE employees have been overwhelmingly positive. Employees indicate that these events have brought a new understanding and appreciation for their colleagues and for the diversity of others.

- Encouraging employees to participate voluntarily in direct and consequential community service consistent with Executive Order 12988,² Executive Order 13401,³ and OPM guidelines.⁴ These services include *pro bono* legal and other volunteer activities. OGE has a designated *Pro Bono* Coordinator who actively participates in the Interagency Pro Bono Working Group, a group of approximately 36 agencies (chaired by the Department of Justice). As a result, in fiscal year 2012 several OGE attorneys performed *pro bono* services at the District of Columbia Bar's *Pro Bono* Program Advice and Referral Clinic.

OGE will continue its strong efforts to create and promote a positive performance culture in fiscal year 2014.

B. Offering Employee Wellness Programs

OGE offers a number of health and wellness opportunities to employees. OGE provides employees with access to a Health Unit one block from OGE's offices through the Federal Occupational Health Service (FOH), a program of the Department of Health and Human Services. Employees can visit the Health Unit for regular health screenings and certain basic, unexpected health needs. A nurse from FOH visits OGE monthly to offer blood-pressure, cholesterol, vision, and diabetes screenings for all employees. Through FOH, OGE offers its employees flu shots seasonally and tetanus shots periodically. FOH also hosts occasional brown bag lunches to discuss topics such as healthy diets, sunscreen use, and the importance of regular health screenings. Finally, OGE employees can access counseling services through the Employee Assistance Program.

The building in which OGE leases its office space contains a fitness facility, renovated in 2009, that is available without charge to the employees of all building tenants. The building also provides a secure bicycle rack in its parking garage for tenants' employees who bike to work.

With regard to nutrition, OGE's building does not contain a cafeteria, but its downtown location is surrounded by numerous eateries that offer healthy dining choices. Additionally, there are full-size refrigerators and designated food preparation areas within OGE's office space. Many, if not most, of OGE's employees utilize these facilities to bring lunch to work. In addition to three drinking fountains and water in kitchen facilities, bottled water is available for employees who have pooled their personal funds for a commercial bottled water service.

² Exec. Order No. 12988, 61 Fed. Reg. 4729 (February 7, 1996).

³ Exec. Order No. 13401, 71 Fed. Reg. 24737 (May 1, 2006).

⁴ Guidance on Scheduling Work and Granting Time Off to Permit Federal Employees to Participate in Volunteer Activities, Office of Personnel Management (April 6, 2004).

Section VI – Conclusion

OGE will use its fiscal year 2014 budget request to support its mission of fostering high ethical standards for Executive Branch employees and, thereby, to enhance the public's confidence that the government's business is conducted with impartiality and integrity. OGE will employ its resources to achieve its strategic goals of strengthening the ethical culture within the Executive Branch, preventing conflicts of interest, and promoting good governance. The budget request provides the amount OGE anticipates it will need to carry out its statutorily required mission, including the increased demands and requirements mandated by the Stock Act, as well as to conduct activities designed to enhance OGE's oversight of the Executive Branch ethics program.