

May 13, 1997

MEMORANDUM

TO: Jack Covalleski
Associate Director, OAP

FROM: Phyllis A. Hoffer
Management Analyst, PRD

SUBJECT: Results of OGE's Agency Ethics Training Program Survey

The Office of Government Ethics' (OGE) training regulation at 5 C.F.R. part 2638 gives each executive branch agency the responsibility for developing and maintaining its own ethics training program. OGE provides direction and assistance to agency internal education programs through an ongoing process of review, evaluation, and refinement of the training requirements; assessment of customer experiences and needs; and periodic review of individual agency ethics training programs. This role is defined in OGE's strategic plan.

Since 1992, when the regulation became effective, OGE has changed educational requirements, allowing agencies more flexibility in administering their ethics training programs. Those changes have been based to a great extent on OGE's review and evaluation of agency training programs and feedback received from our agency customers. As part of the continuing evaluation process, in February 1997, OGE's Program Review Division conducted a survey to learn more about the experiences, opinions, and needs of agency ethics officials regarding various facets of their agency ethics training program.

To accomplish the survey objectives, we sent a questionnaire to 175 ethics officials including the Designated Agency Ethics Official (DAEO) at the 131 executive branch agencies cited in OGE's January 1997 DAEO list and the primary ethics official at an additional 44 component agencies (components) to obtain information and opinions on the following ethics training program topics: (1) program successes, problems, and solutions; (2) satisfaction with OGE guidance and assistance; (3) satisfaction with executive branch agency senior management support; (4) employee satisfaction

with ethics training; (5) training objectives; (6) measures of compliance; (7) effectiveness of training methods; and (8) effects of budget cuts.¹ We also provided ethics officials with an opportunity to comment on various issues. This report presents the information provided by the 94 ethics officials who responded to our questionnaire.²

RESULTS IN BRIEF

Developing and maintaining an agency ethics training program is a challenge because of the many regulatory and administrative requirements and because it is a resource intensive operation in a period of budget reductions. Although ethics officials believe that they have accomplished much toward meeting the requirements of their agency program and were generally satisfied with the assistance provided by OGE, they identified both regulatory change and program delivery improvements which they believe would help them more efficiently and effectively meet program objectives and increase employee satisfaction with ethics training.

- Although at least 80 percent of the ethics officials considered their agency ethics training program successful in each of the categories studied, they still identified continuing significant problems.

- While at least 75 percent of the ethics officials were generally satisfied with the level of guidance and assistance provided by OGE in each of the areas studied, they pointed out areas in which additional help was needed. Over 75 percent were satisfied with the support received from their agency's senior management.

- Most indicated that their primary ethics training program objectives were being met and offered as support for this opinion the methods they used to evaluate their

¹The components were from the Departments of Agriculture, Transportation, Treasury, Veterans Affairs, Justice, and Interior. Additional details of the scope and methodology are discussed in appendix I.

²In addition to reporting this information, analysis by demographic factors including (1) agency/component, (2) Department of Defense (DOD)/non-DOD, and (3) agency size are presented in footnote when significant or of interest.

program. They also offered ideas for alternative methods of measuring program effectiveness.

- While reporting that employees were generally satisfied with the ethics training they received in 1996, ethics officials offered suggestions for increasing employee satisfaction. They also identified effective training methods and the attributes of effective methods.

- About 20 percent of the ethics officials indicated that budget cuts had or could have at least a moderate effect on their agency ethics training program.

PRINCIPAL FINDINGS

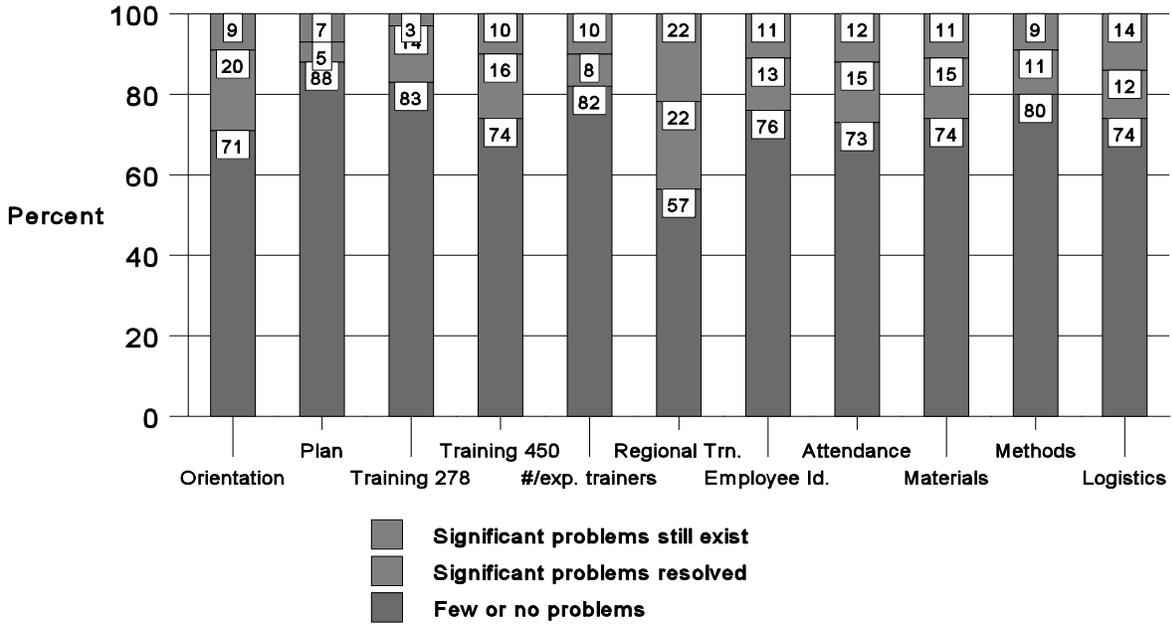
Most reported successes in the operation of their training program, but some significant problems still exist

Ethics officials were asked a series of questions to learn their views on the operation of their agency ethics training program since the inception of the training regulation. Their opinions were sought to identify program requirements and related functions for which they had experienced relative success and for which significant problems remain.³

Most ethics officials reported that they had experienced many successes. As shown in Figure 1, more than 70 percent of the ethics officials reported experiencing few or no problems in each of the ethics training program requirements and related functions studied except one, regional training (57 percent). As an additional indicator of success, many ethics officials reported that significant problems that had existed, such as providing initial ethics orientation, had been resolved. Overall, about 80 percent of the ethics officials reported that they were successful in each of the program requirements and related functions studied.

³The requirements and related functions studied included: (1) initial ethics orientation, (2) annual training plan, (3) annual training-SF 278 filers, (4) annual training-OGE 450 filers, (5) number/experience of trainers, (6) regional (outside of headquarters) training, (7) attendance monitoring, (8) training materials, (9) training methods, and (10) logistical support.

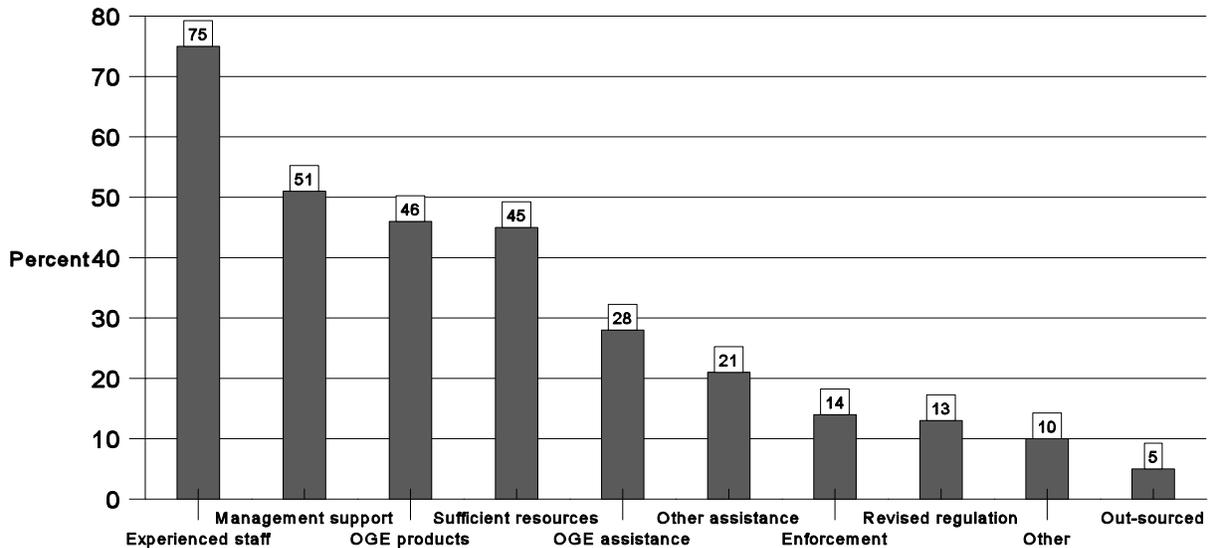
Figure 1: Successes and Unresolved Problems - Program Operations



Note: Percentages may not total to 100 percent due to rounding.

Ethics officials attributed their successes in ethics training to many factors, citing experienced staff (75 percent) most frequently. Other factors frequently identified included agency management support (51 percent), OGE training products (46 percent), and sufficient resources (45 percent), as shown in Figure 2.

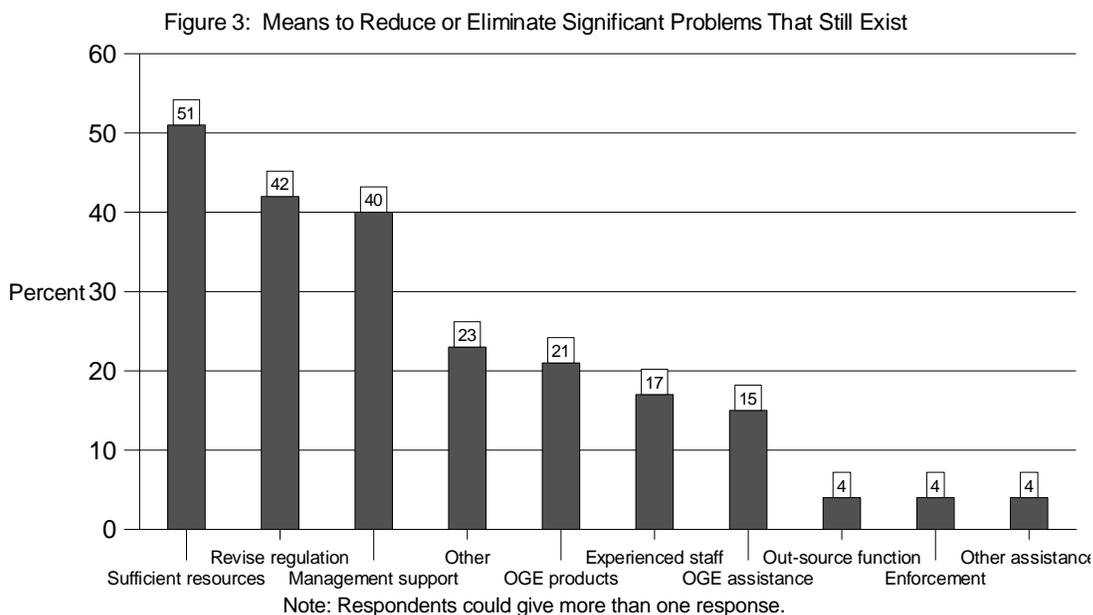
Figure 2: Primary Factors Attributed to Successful Program Operations



Note: Respondents could give more than one response.

Although most ethics officials considered their program successful, some indicated that significant training problems still exist. As previously shown in Figure 1, 22 percent identified regional training as an area in which they are still experiencing significant problems and about 10 percent identified significant problems in most of the other areas studied. Written comments most often identified getting employees to attend training as an unresolved significant problem.⁴

Ethics officials offered various options for reducing or eliminating those remaining significant problems. Most often suggested were the need for sufficient resources, revised OGE regulations, and management support, as shown in Figure 3.



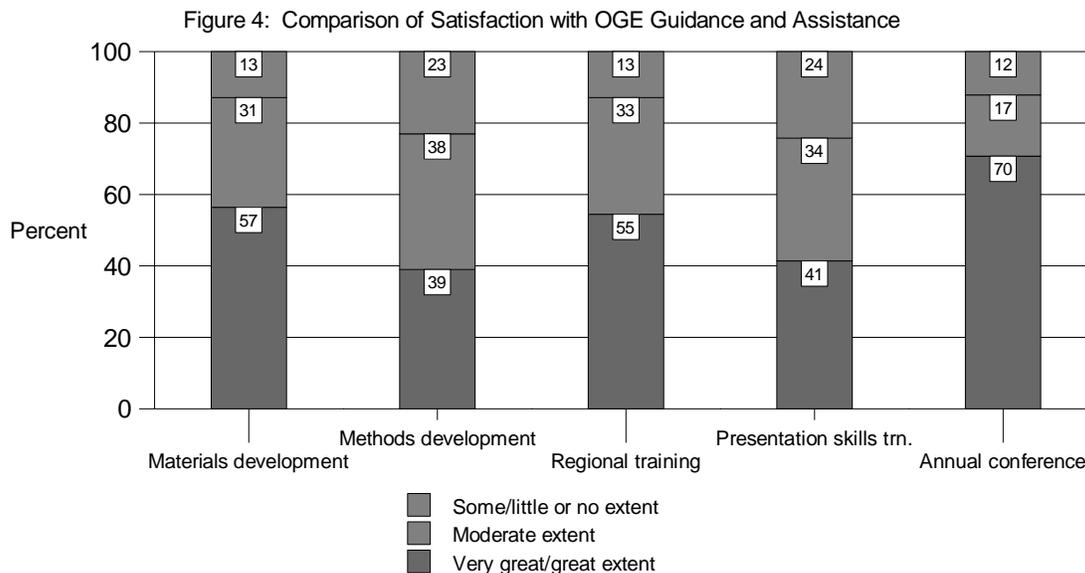
Most were generally satisfied with OGE assistance and satisfied with support from their agency senior management

Ethics officials were asked a series of questions to learn to what extent they were satisfied with the level of guidance and

⁴Non-DOD respondents more frequently reported that significant problems continue to exist than did DOD respondents, and components more frequently than agencies.

assistance provided by OGE and the support received from their agency's senior management regarding the ethics training program.⁵

Ethics officials indicated that they were generally satisfied with the support provided by OGE in the five program areas studied. At least 75 percent reported that they were satisfied to a moderate extent or better with the guidance and assistance provided in each of the areas. From 39 to 70 percent were satisfied to a very great/great extent. Assistance regarding OGE's annual conference was the strongest area, as reflected in Figure 4.

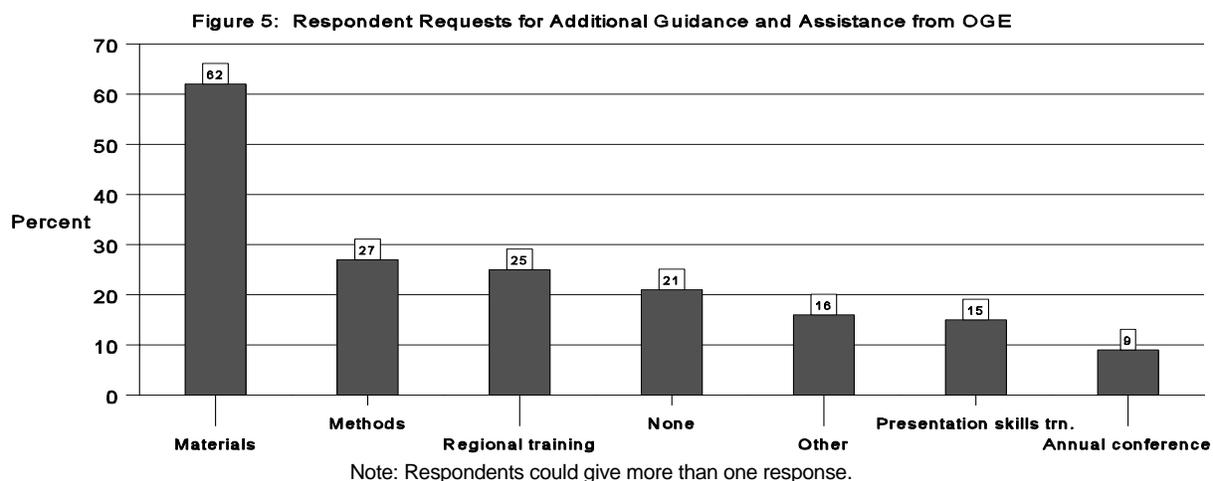


In contrast, 12 to 24 percent of the ethics officials reported that they were less satisfied with the guidance and assistance provided for these 5 areas. Assistance with presentation skills training and methods development were identified as the weakest areas by over 20 percent of the ethics officials. However, it should be noted that while presentation skills training received a relatively low satisfaction rating, it also received a relatively high proportion of "no basis to judge" responses (not illustrated

⁵The ethics training areas studied included training materials development, training methods development, DC/regional training for ethics officials, presentation skills training, and OGE's annual conference.

in figure 4),⁶ indicating that there may not be widespread exposure to presentation skills training.

While indicating general satisfaction, most ethics officials also identified areas in which they would like additional help from OGE. As reflected in Figure 5, training materials development was identified by over 60 percent of the ethics officials and regional training and methods development were indicated by over 25 percent. Written comments primarily focused on training materials development, asking for more materials on a variety of topics (especially in video format). Other comments included requests for more attendee slots to be available at OGE’s annual conference and more training materials to be available on OGE’s Web page. Continued operation of the Ethics Information Center was also requested.



More than 75 percent of the ethics officials indicated high satisfaction levels with the support received from their agency’s senior management regarding developing, maintaining, and improving their ethics training program. Because of this reported high satisfaction level, it was not surprising to find that nearly 65 percent indicated that no additional assistance was needed from OGE to help raise the awareness level of agency senior management regarding the importance of the ethics training program. However, many ethics officials, including some who were highly satisfied, indicated that additional assistance including a visit from OGE’s Director (16 percent) and OGE presentations at agency forums (28 percent) would help. Written comments also indicated the

⁶In this chart we included information only for those ethics officials who had a basis to judge their level of satisfaction.

desire for a visit or letter from OGE's Director to the agency head.

Training program objectives were met;
ideas were offered for measuring
the effectiveness of training

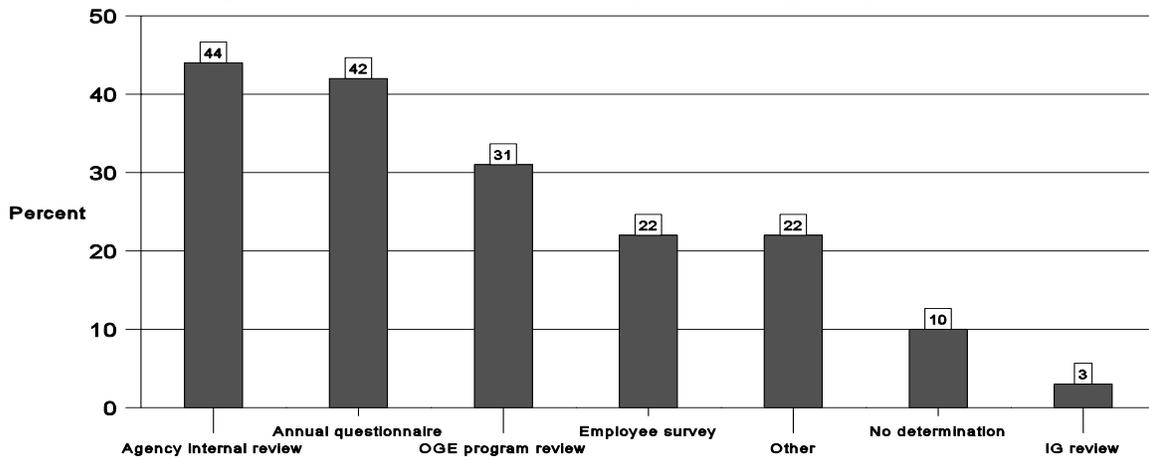
Ethics officials were asked a series of questions to learn what they considered to be the objectives of their agency's ethics training program, to what extent those objectives were being met, and by what methods they determine whether or not those objectives were met. They were also asked for suggestions for alternative or new methods of measuring the effectiveness of an agency ethics training program.⁷

An overwhelming majority of the ethics officials identified both complying with ethics rules and regulations (88 percent) and informing employees (89 percent) as the primary objectives of their agency ethics training program. Providing an ethics point of contact was also very frequently identified (70 percent). Most ethics officials also reported that they were meeting these three primary training objectives. Changing employee attitudes and behavior were identified as secondary objectives by over 50 percent of the ethics officials and those objectives were reportedly met to a lesser extent. Finally, one or more ethics officials indicated that complying with ethics rules and regulations, informing employees, and/or providing an ethics point of contact were neither primary nor secondary objectives of the ethics training program at their agency.

In support of their high level of certainty that program objectives were being met, ethics officials cited the methods they used to evaluate their program, most frequently indicating agency internal reviews (44 percent), OGE's annual questionnaire (42 percent), and OGE program reviews (31 percent), as shown in Figure 6. About 10 percent, however, indicated that they had made no determination. Also, a number of ethics officials commented that questions and feedback from employees were ways that they determined whether or not training objectives had been met.

⁷The program objectives queried included complying with ethics rules and regulations, changing employee attitudes, informing employees, changing employee behavior, and providing an ethics point of contact. The methods of determining compliance with objectives included agency internal review, agency Inspector General review, employee survey, OGE annual questionnaire, OGE ethics program review, and no determination.

Figure 6: Methods Used to Determine Compliance with Program Objectives



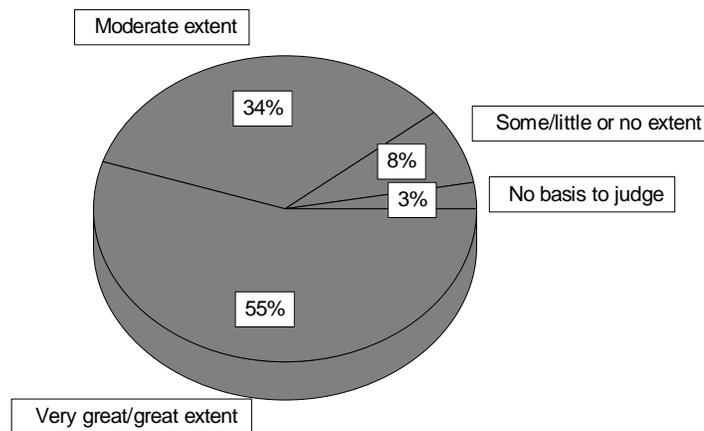
In addition to the evaluation methods and comments identified above, when asked to offer ideas for alternative or new methods for measuring the effectiveness of an agency ethics training program, many ethics officials again suggested obtaining employee feedback.

Employees appear generally satisfied;
further improvements suggested

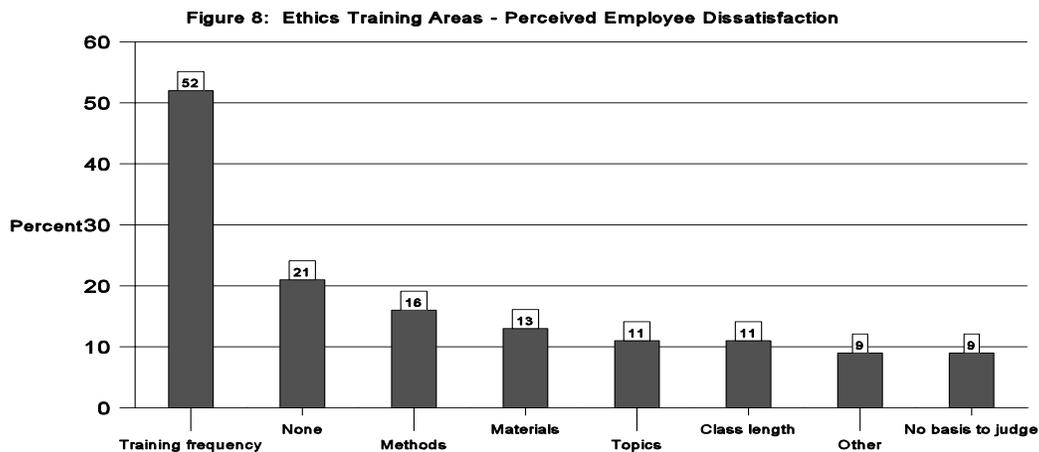
Ethics officials were asked a series of questions regarding their views on employee satisfaction with the ethics training they attended in 1996.

As shown in Figure 7, 89 percent of the officials believed that employees were generally satisfied (moderately or better) with the ethics training they had attended. Only 8 percent indicated that employees were satisfied to some/little or no extent.

Figure 7: Views on Extent of Employee Satisfaction with 1996 Ethics Training



While indicating general satisfaction, ethics officials also identified areas for which employees were generally dissatisfied and offered suggestions for program improvements. Training frequency⁸ was identified by over 50 percent of the ethics officials as the area for which employees were dissatisfied, as shown in Figure 8. No other area came close.⁹ Ethics officials reported that they primarily based their perceptions of employee satisfaction and dissatisfaction on verbal feedback from employees (90 percent) and on trainer observation (56 percent). However, we also found that over 25 percent of the ethics officials based their responses on employee written evaluations of training.¹⁰



Note: Respondents could give more than one response.

⁸Our survey was conducted prior to the issuance of the most recent interim rule amendments to subpart G of 5 C.F.R. part 2638, which become effective generally on June 10, 1997, 62 Fed. Reg. 11307-11314 (March 12, 1997), as corrected at 62 Fed. Reg. 13213 (March 19, 1997) and 62 Fed. Reg. 14737 (March 27, 1997). The interim rule generally provides, among other things, that an agency may satisfy the annual ethics briefing requirement for covered employees, other than public filers, through the distribution of a written ethics briefing to those employees for up to two out of every three calendar years. This change provides agencies relief from the current annual verbal training requirement for most employees.

⁹Training frequency was the primary response regardless of demographics, except for the smallest agencies/components.

¹⁰Larger agencies/components (10,001 or more employees) and DOD more frequently reported the use of written evaluations than did smaller agencies/components and non-DOD.

Ethics officials, including some who believed that employees were generally satisfied with the training they attended, suggested that reducing the frequency of ethics training was a way to increase the level of employee satisfaction. Other ideas included making training materials more relevant and interesting and using training methods such as games, videos, CBT, and satellite broadcasts.

Several training methods were identified as effective, while others were considered ineffective

Ethics officials were asked to indicate how effective or ineffective they considered various training methods and what primary factors make these training methods effective.¹¹

Ethics officials clearly differentiated between the more and less effective ethics training methods. The methods most often identified as being very/generally effective were OGE produced videos (83 percent), discussions with case studies (80 percent), and lectures using slides/overheads (63 percent). Conversely, distributing the standards of conduct and/or agency supplemental regulations was considered to be the most ineffective method (44 percent).

Another factor to be considered in evaluating effectiveness of these training methods is that several methods received high "no basis to judge" ratings including CBT (73 percent), teleconference (68 percent), satellite broadcast/video (48 percent), and agency produced videos (42 percent). The high unknown factor may indicate to some extent that some methods are not sufficiently developed to be in widespread use (e.g., CBT) or readily available at some agencies.

Along with telling us which training methods were effective or ineffective, ethics officials offered ideas as to what primary factors contribute to making methods effective. Comments included that training methods should be interactive, fun, and convenient.

¹¹The methods listed included (1) distributing the standards of conduct/agency supplemental regulations; (2) distributing handbooks, pamphlets, etc; (3) lecturing with slides; (4) lecturing without slides; (5) showing OGE produced videos; (6) showing agency produced videos; (7) discussions with cases studies; (8) discussions without case studies; (9) using CBT; (10) teleconferencing; and (11) showing a satellite broadcast or video.

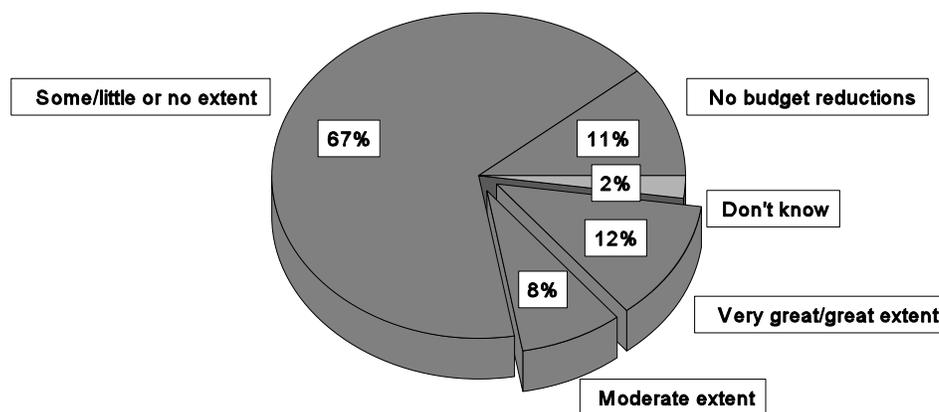
These comments were somewhat similar to responses to our previous question on how to increase the level of employee satisfaction.

Many reported impact of budget reductions

Ethics officials were asked to what extent agency budget reductions had negatively affected their agency's ethics training program and, if so, what aspects of ethics training had been or might be affected.

Twenty percent of the ethics officials indicated that budget reductions had or could have a negative impact on the operation of their agency ethics training program. As shown in Figure 9, 12 percent reported experiencing or potentially experiencing a substantial effect and an additional 8 percent reported a moderate effect.¹²

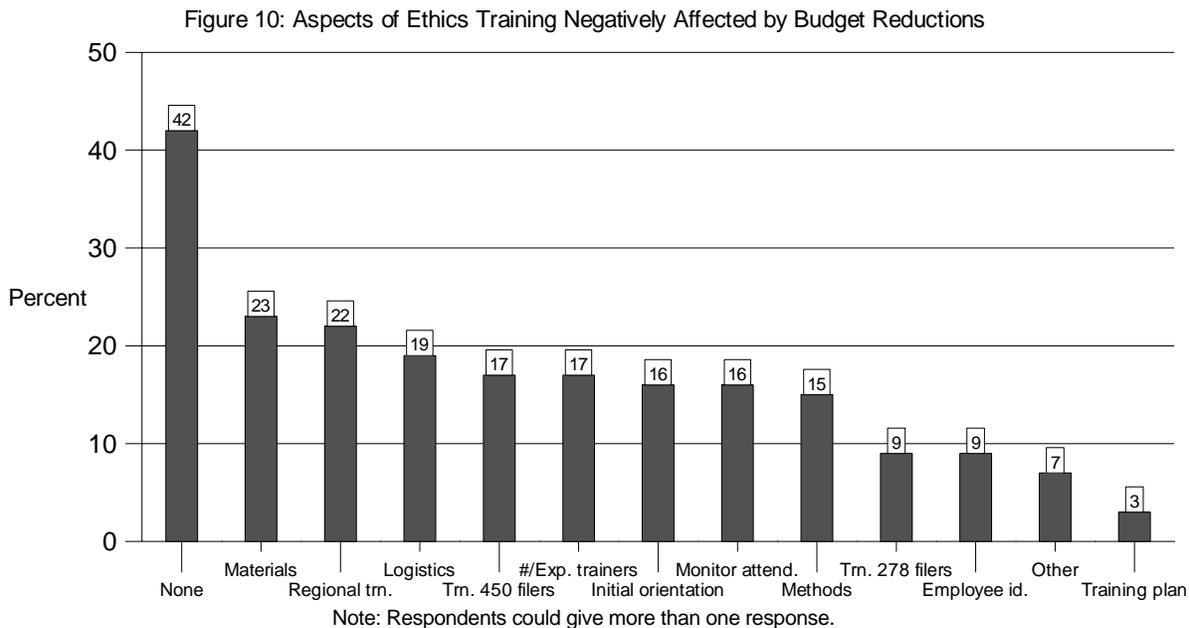
Figure 9: Effect of Agency Budget Reductions on Ethics Training Program



Ethics officials, including those who reported minimal effects, identified aspects of their program that had been or might be impacted to some degree. As reflected in Figure 10, conducting regional training and developing training materials were each identified by almost 25 percent of the ethics officials.

¹²Substantial effect was indicated more frequently by components than by agencies, larger entities than by smaller, and non-defense rather than by DOD. The reporting of minimal effect was fairly consistent regardless of demographics.

Finally, about one-third of the ethics officials offered insight into the steps they have taken or plan to take to cope with reduced funding or to work more efficiently including developing/using CBT, videos, teleconferencing, and satellite broadcasts/videos; sharing resources with other agencies; and using more OGE provided resources.



Ethics officials have the last word

We offered ethics officials the opportunity to have the last word. When asked what other ideas they had regarding how OGE and/or agencies could improve agency ethics training programs, ethics officials echoed ideas that they had identified previously throughout the survey. They suggested that they would like OGE to, among other things, provide relief from the annual training requirement; develop and provide innovative training methods and relevant and interesting materials; and assist in conducting ethics training, including skills presentation training.

CONCLUSIONS AND RECOMMENDATIONS

Developing and maintaining an agency ethics training program is a challenge. Regulatory and administrative requirements are extensive and finding the resources to meet those requirements can be difficult in a period of budget reductions. Most ethics officials, however, believe that they have met that challenge. Most also report that they are generally satisfied with the

services provided by OGE but would like OGE to provide regulatory relief from the annual training requirement, assist in developing program delivery improvements, and offer additional assistance and guidance regarding agency regional training. They believe that those steps would help agencies more efficiently and effectively meet training program objectives and increase employee satisfaction with ethics training.

Officials believe that primary training objectives are being met and are using various evaluation methods to support that determination. They also suggested obtaining feedback from employees as another method of determining if program objectives are being met and/or measuring the effectiveness of ethics training. In fact, many have already begun obtaining written training evaluations from employees. However, there is no consensus on standard measures to use to make those performance measurements. Our survey has highlighted the need to develop those measurements. This is especially significant since establishing program performance measures is a requirement of the Government Performance and Results Act.

The call for regulatory relief from the annual ethics briefing requirement for covered employees, other than public filers, should be met by agency implementation of the recent interim rule amendments to the training regulation. However, now that relief has been provided, the effects of the resultant changes must be identified and evaluated to determine the impact on employees and the ethics program.

In light of the results of our survey, we recommend that OGE

- develop additional relevant training materials on a variety of topics, using the latest instructional methods including videos and CBTs, as well as other training tools, for agency use;
- review and evaluate agency regional ethics training (and other regional ethics program issues) to determine what problems exist and how to best assist agencies;
- review and evaluate changes that occur as a result of the training regulation amendments to determine the effect on agency ethics training programs;
- obtain and review agency ethics training evaluation instruments (used by agencies to measure employee satisfaction and/or learning) and make the best practices known and available to other agencies;

- develop performance measures for ethics training, to be used Governmentwide; and

- continue to periodically monitor the impact of budget reductions on agency ethics training programs.

If you have any questions about this report, please contact me.

Attachment

APPENDIX I

SCOPE AND METHODOLOGY

To accomplish the objectives of our survey we sent a questionnaire to 175 ethics officials including the DAEOs at the 131 executive branch agencies listed in OGE's January 1997 DAEO list¹³ and the primary ethics officials at an additional 44 components of 6 large agencies. We requested that the questionnaire be completed by the individual primarily responsible for the agency ethics training program and promised anonymity to all ethics officials. Completion of the questionnaire was voluntary.

The results of the survey discussed in this report are based on responses from the 94 agencies and components that completed and returned the questionnaire by March 1997, representing a response rate of 54 percent.¹⁴ The survey results presented in this report represent the responses received. They are not projectable to the universe.

For many questions in the questionnaire, ethics officials chose from five response categories so that their answers would closely reflect their views. However, we collapsed categories on some questions for clearer reporting. In addition to reporting the primary survey results, results based on demographic factors including agency/component, DOD/non-DOD, and agency size were included as footnotes in this report where of significance and/or interest.¹⁵

¹³The DAEO list included departments, agencies, offices, commissions, DOD component agencies, etc.

¹⁴This response rate is above the 30 percent to 50 percent rate expected within several weeks after a questionnaire mailing, per the General Accounting Office's (GAO) October 1993 issuance Developing and Using Questionnaires, GAO/PEMD-10.1.7. In this document GAO states that one or two follow-up mailings may further increase the response rate; however, we chose not to conduct additional mailings.

¹⁵Of the 94 responses, 64 (68 percent) were from agencies, 27 (29 percent) were from components, and 3 (3 percent) were designated "other" or left blank. Also, 9 (10 percent) were from DOD agencies/components, 83 (88 percent) were non-DOD, and 2 (2 percent) were left blank. Demographics by agency/component size showed that 15 (16 percent) had 100 or fewer employees; 21 (22 percent) had 101 to 1,000 employees; 30 (32 percent) had

During the design of our survey, we conducted an issues discussion group including ethics officials from six agencies. In addition, our draft questionnaire was reviewed by several members of the group and also by ethics officials from other agencies and components. Also, we conducted pretests of the questionnaire with both agency and component ethics officials.

Questions in which ethics officials could choose more than one response are noted. Percentages in these figures will not total to 100 percent. Percentages in other figures also may not total to 100 percent due to rounding. All percentages are based on the number of ethics officials who answered each question, which in some cases was fewer than the total number of ethics officials to the questionnaire. For some questions, "no basis to judge" responses were eliminated in order to more clearly represent opinions of those ethics officials who had a basis.

1,001 to 10,000 employees; 19 (20 percent) had 10,001 to 100,000 employees; 6 (6 percent) had more than 100,000 employees, and 3 (3 percent) were left blank.