

A Vision for Ethics Program Management: Benchmarking Success

A Report on the Regulatory Agencies’ Incorporation of the Critical Success Factors for Ethics Program Management

January 2012



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INTRODUCTION

To realize long-term ethics program effectiveness and to foster an ethical culture, an agency must not only be in compliance with ethics laws and regulations but must also develop strategies for addressing factors that are critical to the success of an ethics program. These success factors are as follows:

- Leadership—agency leaders and supervisors support and are involved in the program
- Awareness—employees are aware of the ethics program and its role as well as their personal ethical responsibilities
- Resources—agency and ethics community resources are leveraged
- Oversight—internal controls and oversight of the ethics program are established

To advance this vision for successful ethics program management within the executive branch, OGE embarked on a project to benchmark agencies' incorporation of the success factors into their ethics programs and to identify concrete actions the agencies have taken to address each of the success factors. As part of these efforts, OGE distributed a self-assessment questionnaire to the agencies, which asked them to identify concrete actions taken to address each of the success factors. In 2010, OGE benchmarked the incorporation of the success factors at the Cabinet agencies.¹ In 2011, OGE extended this review to 16 regulatory agencies.² The results of the regulatory agency benchmarking project are contained in this report.

This report consists of three parts:

- (1) Benchmarking Results: Critical Success Factors
- (2) Critical Success Factors: Concrete Actions
- (3) Comparative Data.

The information presented will allow agencies to learn how other similarly situated agencies have incorporated the critical success factors. However, not all of the concrete actions identified in this report are suited to every agency. Incorporation of the critical success factors requires careful, ongoing assessment of agencies' individual programs and the development of agency-specific strategies.

¹ OGE's benchmarking report on the Cabinet agencies, "A Vision for Ethics Program Management: Benchmarking Success", can be found on OGE's website at <http://www.oge.gov/Program-Management/Program-Management-Resources/Program-Management-Resources/>.

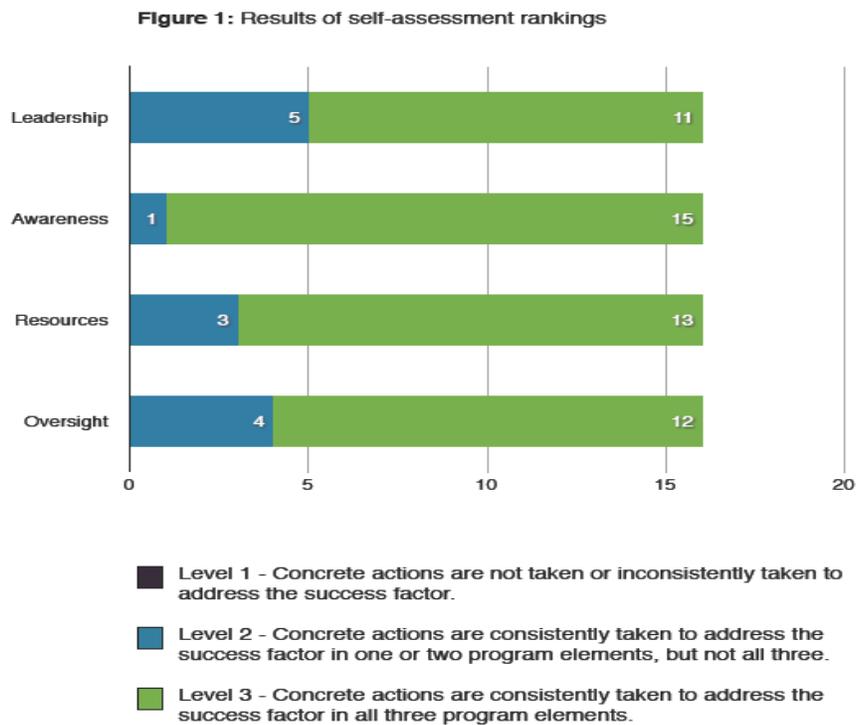
² Commodity Futures Trading Commission, Consumer Product Safety Commission, Environmental Protection Agency, Farm Credit Administration, Federal Communications Commission, Federal Deposit Insurance Corporation, Federal Energy Regulatory Commission, Federal Housing Finance Agency, Federal Maritime Commission, Federal Reserve Board, Federal Trade Commission, National Credit Union Administration, National Labor Relations Board, Nuclear Regulatory Commission, Postal Regulatory Commission, and Securities and Exchange Commission.

We would like to thank each of the agencies for the time and effort they spent in completing the self-assessment questionnaire as well as participating in the follow-up interviews. Their assistance was critical to the success of this project.

PART ONE: BENCHMARKING RESULTS: CRITICAL SUCCESS FACTORS

In a 2010 benchmarking of Cabinet agencies, OGE, in consultation with the Cabinet agencies, identified four critical success factors: *leadership, awareness, resources, and oversight*. OGE developed a tool to benchmark the level at which agencies were addressing the factors that lead to a successful ethics program. OGE defined three levels and asked agencies to select for each success factor the level most representative of their respective agency. The three levels are differentiated based on the consistency at which concrete actions are taken to address the success factor in the areas of financial disclosure, ethics counseling, and ethics training. In 2011, OGE extended this model to 16 regulatory agencies.

Figure 1 shows the level at which the agencies ranked themselves for each critical success factor. The majority of the agencies ranked themselves at a level three, which means that they are consistently taking concrete actions to address each of the critical success factors. For each of the critical success factors, there were also agencies that ranked themselves at a level two, indicating that they are consistently taking concrete actions to address the critical success factors but in only one or two of the program element areas. Notably, none of the agencies ranked themselves at a level one for any of the success factors.



PART TWO: CRITICAL SUCCESS FACTORS: CONCRETE ACTIONS

Based on the responses provided by the agencies, OGE identified the following 14 categories of concrete actions for each critical success factor. Some categories are common among the benchmarked agencies while others are applicable to only a few.

Leadership	Awareness	Resources	Oversight
Visible Support	Distributing of Ethics-Related Information	Participation in Ethics-Related Events	Financial Disclosure, Training, and Advice and Counsel Tracking Systems
Access	Marketing the Ethics Program	Collaboration within the Ethics Community	Standard Operating Procedures
Involvement in Managing the Ethics Program	Training	Relationships within the Agency	Customer Feedback/Self-Assessment
Budgetary Support		Electronic Filing Systems	

Based on the written responses from the regulatory agencies and commentary collected during the interview phase of this project, OGE identified concrete actions these agencies are taking to address the critical success factors. The concrete actions listed in this report are not a complete collection of actions an agency can take to address each of the success factors, rather they are a compilation of the most common and the most innovative based on an analysis of the information collected. In this section, we will define each of the critical success factors, identify categories of common concrete actions, and highlight specific practices agencies may want to consider incorporating into their ethics programs. OGE also created nine information graphics to assist agencies in comparing their ethics program to the other regulatory agency ethics programs. These information graphics can be found in Part Three of this report.

LEADERSHIP (Support of and involvement in the program by agency leaders and supervisors)

It is critical that agency leadership at all levels show support for and involvement in the ethics program. Ethics program activities and requirements do not operate in a vacuum. Employees face competing demands for their time and attention. Cues from agency leaders as to which responsibilities take precedence exert a strong influence on employees' decisions. Even well-designed ethics initiatives, therefore, will have a limited impact if employees view the initiatives as peripheral or a hindrance to an agency's mission.

We have identified four categories of common concrete actions that agency leaders and supervisors are taking to show support of and involvement in the ethics program. The four categories are (1) visible support, (2) access, (3) involvement in managing the ethics program, and (4) budgetary support.

Visible Support

All agencies believe leadership visibly demonstrates support for their ethics program. Agency leaders visibly supported the ethics program in a variety of ways, such as delivering messages in-person to employees at ethics training sessions about the importance of ethics, appearing in videos used at ethics training sessions, sending messages to all employees discussing the importance of ethics and seeking ethics guidance, issuing written statements on ethics, sharing news stories about ethics, sending messages reminding employees to timely file their financial disclosure report and attend annual ethics training, and attending ethics training with their staff. Several agencies commented that the relatively smaller size of a regulatory agency provides greater visibility of agency leaders and opportunities for them to show support of the ethics program.

FOR YOUR CONSIDERATION

At the **Federal Deposit Insurance Corporation**, the agency's former Chairman regularly delivered messages over the telephone to all employees on agency core values, and ethics is specifically addressed as a core value. The Chairman recorded messages that reminded employees that ethics is held in high regard at the agency.

At the **Farm Credit Administration**, the agency's Chief Examiner helps foster an ethical culture by inviting the ethics staff to provide ethics training during the annual or bi-annual Office of Examination all-staff meeting, which helps emphasize the importance of the ethics program to the agency's examiners. This forum also enables the examiners in the agency's field offices to become familiar with the ethics staff, which in turn helps employees feel more comfortable about requesting guidance from the ethics staff.

At the **Federal Housing Finance Agency**, Ethical Leadership training for supervisors was identified in the agency's 2011 Annual Performance Plan as a specific means to achieve the performance goal of a "diverse workforce that is highly skilled, highly motivated and results oriented." The Ethical Leadership training aims to give supervisors the information needed to carry out their dual roles with respect to the ethics program: remaining personally compliant and setting the ethical tone for the agency.

At the **Federal Reserve Board**, a video message from the Chairman discussing the importance of ethics is posted to the Board's Intranet site, "Inside the Board." When the ethics section of the Intranet site was revised, the ethics office used the video to generate excitement about the revised ethics page. The ethics office also informs new employees during an hour orientation on their second day of work, to watch it as they are familiarizing themselves with the ethics web site. This video introduces new employees to the ethics Intranet page.

Access

All 16 agencies reported that they have continual access to their leadership. Access is gained by having ethics officials work in close proximity to leaders, by attending and participating in senior staff meetings on a regular basis, by briefing leadership on emerging ethics issues or trends, and by participating in meetings concerning agency initiatives and projects. A few agencies felt that assisting leadership on their new entrant public financial disclosure reports was one of the most beneficial ways to gain access. A number of agencies also reported that their General Counsel serves as the Designated Agency Ethics Official (DAEO) and has regular access to leaders through that role.

FOR YOUR CONSIDERATION

At the **Environmental Protection Agency**, the agency's ethics office is involved in the vetting process for the Administrator's calendar. The Administrator's scheduling office uses an electronic database system to compile invitations received and to send them throughout the agency for vetting. The ethics office is part of that evaluation process. Should an event be determined to be unacceptable for ethics reasons, it is immediately removed from consideration and declined.

Involvement in Managing the Ethics Program

Generally, the regulatory agencies reported few instances of non-responsive or late filers of public and confidential financial disclosure reports; however, all agencies felt that leadership, upon request, would assist ethics officials in following-up with filers.

Budgetary Support

All 16 agencies reported leadership support for funding to operate their ethics program. For example, some agencies received funding for financial disclosure filing and tracking systems, development of on-line training modules, and training for ethics officials. A few agencies were able to hire additional ethics officials and consultants or reclassify the ethics positions to reflect a higher level of authority within the agency.

AWARENESS (Awareness of the ethics program and its role)

Employees should be aware of the ethics program and its role and their personal ethical responsibilities. Building awareness can raise the visibility of the ethics program, foster an ethical culture, and minimize risk to the agency and its employees.

We identified three categories of common concrete actions that benchmarked agencies are taking to build awareness of the ethics program and its role. The three categories are (1) distributing ethics-related information, (2) marketing the ethics program, and (3) training.

Distributing Ethics-Related Information

Agencies identified various methods for distributing ethics-related information to employees, such as email, newsletters, intranet or internet pages, and posters. Email was generally reported as the primary method of distributing information. A common use of email is to send out information regarding various ethics topics, such as gifts during the holiday season, outside activities, widely attended gatherings, and media accounts illustrating the consequences of neglecting ethical responsibilities. Email messages are also used to remind financial disclosure filers of upcoming due dates and common reporting mistakes. Many agencies reported an increase in phone calls and email messages after distributing ethics-related emails.

Six of the agencies reported that they either publish an ethics newsletter or contribute to an agency newsletter. Most of the agencies use their agency intranet or internet site to post ethics-related information. Agencies include a wide range of information and resources on these sites, including the agency's prohibited sources list, guidance on common issues, and links to financial disclosure forms and training modules. Nine agencies indicated that they provide feedback to filers after reports have been reviewed or certified. This feedback helps to build awareness of the financial disclosure requirements by informing filers of the correct way to complete financial disclosure forms as well as providing filers with closure regarding review of their forms.

FOR YOUR CONSIDERATION

At the **Federal Energy Regulatory Commission**, ethics officials send out "Ethics in the News" emails to all employees. These emails share published news articles about the potential consequences of not complying with ethics requirements. Ethics officials distribute these articles to enhance awareness of ethics requirements and emphasize the importance of compliance. Employees are asked to contact an ethics official if they have any questions about ethics requirements in relation to any activity they are engaged in or are considering.

At the **Federal Trade Commission**, the DAEO disseminates a personalized memorandum to all public filers after certifying their report. The memorandum discusses

the conflict of interest rules, highlights potential conflicts of interest, and reminds filers who to contact should questions arise. A similar memorandum is distributed to certain confidential filers. When reviewing confidential reports that will be certified by the DAEO, Deputy Ethics Officials send personalized emails to filers discussing the relevant rules and potential issues based upon information contained in the reports.

Marketing the Ethics Program

Agencies identified various ways of marketing the ethics program, such as posters and promotional materials. Ten agencies reported using ethics posters to increase employee awareness of their ethical responsibilities as well as the ethics office. Many of these agencies use posters produced by OGE. Seven agencies used promotional products such as pens, bookmarks, bags, magnets, and fortune cookies as a way to increase awareness of the ethics program.³

Training

Agencies used training, beyond required training, to raise awareness of the ethics rules and ethics staff. All 16 agencies reported that they provide targeted training to employees upon request. Some of these targeted groups include information technology staff, the Office of the Inspector General, procurement personnel, Senior Executive Service (SES) officials, and international regulators.

FOR YOUR CONSIDERATION

Every year, the **Environmental Protection Agency** offers all employees the opportunity to take online ethics training that is developed by the ethics office. According to ethics officials, the agency-wide ethics training has developed into a signature product and is the most visible element of the ethics program. The 2010 training course included a discussion of the ethical implications of an emerging issue – the use of social media in one’s personal and official capacities. More than 14,000 of the agency’s 17,000 employees took this training, reaching far more than the 10,000 employees who were required to receive annual ethics training.

³ The use of promotional materials may diminish in light of an Executive Order issued on November 9, 2011, titled “Promoting Efficient Spending,” which advises that agencies limit the purchase of promotional items, e.g., plaques, clothing, and commemorative items, in particular where they are not cost-effective.

RESOURCES (Leverage agency and ethics community resources)

It is critical that ethics programs leverage resources inside an agency and within the ethics community. Planning how to strategically take advantage of existing resources can eliminate duplicative efforts, maximize efficiency, and facilitate information sharing. To leverage internal agency resources, the ethics program should strive to forge formal relationships with human resources officials, information technology personnel, and the Office of the Inspector General. Additionally, duties and responsibilities of regional and component ethics officials should be designed to maximize efficiency. To leverage external resources, ethics officials should tap into the executive branch ethics community, which is filled with knowledge, expertise and resources. By using these resources, ethics officials can find solutions related to training, tracking systems, and model practices without expending their agency's finite resources.

We identified four categories of common concrete actions that the benchmarked agencies are taking to leverage external and internal resources. The five categories are (1) participation in ethics-related events, (2) collaboration within the ethics community, (3) relationships within the agency, and (4) electronic filing systems.

Participation in Ethics-Related Events

Fifteen agencies leverage ethics community resources by participating in ethics-related events such as the OGE National Government Ethics Conference⁴ and Interagency Ethics Council⁵ meetings. Ethics officials explained that attending ethics-related events outside of their respective agencies helps them stay informed of broad trends, identify and share best practices that can be implemented at their own agency, and further their knowledge of the ethics rules. Some agencies stated that these events provide the opportunity to forge working relationships with ethics officials at other agencies.

Collaboration within the Ethics Community

All 16 agencies leverage external resources by collaborating with other agencies on ethics-related issues. This collaboration takes the form of informal calls and coordination on an occasional basis and using other agencies' ethics materials.

Relationships within the Agency

Fifteen agencies have leveraged internal agency resources by fostering relationships with at least one internal office. All 16 agencies reported having a productive relationship with their respective Office of the Inspector General. In addition, agencies mentioned working particularly well with supervisors and information technology departments.

⁴ OGE has been hosting a conference for ethics officials from throughout the executive branch since 1991. The conference serves to inform ethics officials about the application of ethics-related laws and regulations and provides participants with an opportunity to discuss ethics issues common to the executive branch.

⁵ The Interagency Ethics Council (IEC) supports executive branch employees who work in the area of ethics.. The IEC holds monthly meetings which offer a forum for the exchange of information and publishes a journal at <http://www.iecjournal.org/iec/>.

All 16 agencies characterized their relationship with Human Resources as positive. Most ethics officials stated that they rely on Human Resources to obtain information concerning financial disclosure filing status and entrance and departure dates of employees.

Electronic Filing Systems

Electronic filing systems remain relatively rare; only four agencies use electronic filing systems.⁶ Another four, however, reported that they are investigating or testing electronic filing systems. One agency reported that funding constraints have prevented it from creating an electronic filing system.

FOR YOUR CONSIDERATION

The **Nuclear Regulatory Commission** has a comprehensive ethics management system that is used for electronic submission of financial disclosure reports and also serves as a mechanism for storing advice rendered and tracking ethics training. The ethics management system receives direct information from the Human Resources database, which reduces time-consuming coordination between the offices. The agency also noted that the system improved the efficiency of collecting financial disclosure reports.

The **Federal Deposit Insurance Corporation's** NEETS II system allows for a fully electronic environment to disseminate, track, and manage required financial disclosure reports and to track ethics training. Employees are notified through the system of their assigned forms and the due dates for filing the forms. The agency's human resources system feeds the NEETS II system with personnel information such as new hires, promotions, and terminations. The agency-built system also produces administrative reports that support tracking and oversight.

OVERSIGHT (Establish internal controls and oversight of the ethics program)

Ethics program oversight and internal controls can lead to continuity in program administration, consistency in carrying out ethics functions, accountability in the performance of duties, and increased compliance.

We identified three categories of common concrete actions that benchmarked agencies are taking to establish internal controls and provide oversight of the ethics program. The three categories are (1) financial disclosure, training, and advice and counsel tracking systems; (2) standard operating procedures; and (3) customer feedback and self-assessment.

⁶ Electronic filing involves electronic completion of the form with electronic signing by the filer, followed by an electronic certification by the reviewing official(s), and storage of the report in an electronic storage system. (See OGE Program Advisory [DO-07-014](#).)

Financial Disclosure, Training, and Advice and Counsel Tracking Systems

All 16 agencies use tracking systems for financial disclosure reports and ethics training to maintain oversight of the ethics program. These systems range from paper-based to commercial products (e.g., Excel and Access) and products created in-house. Agencies use these systems to track compliance with financial disclosure and training requirements and as a tool to prompt follow-up with employees. Seven agencies reported having or were in the process of implementing a searchable database for advice and counsel rendered. These systems also include commercial databases, systems created in-house, and networked folders. Agencies commented that databases are helpful in maintaining consistency and minimizing the time spent researching recurring issues.

Standard Operating Procedures

All 16 agencies said that they have some form of standard operating procedures (SOPs). Agencies have SOPs in the areas of financial disclosure, training, advice and counsel, and ethics-related approvals such as outside activities and travel payments from non-Federal sources. These SOPs include formal policies and directives as well as informal procedural documents. Some agencies mentioned that one of the benefits of the SOPs is that they contribute to efficiency in program operations (e.g., timeliness, accuracy, consistency, and clarity). SOPs are also used for succession planning purposes.

FOR YOUR CONSIDERATION

The **Nuclear Regulatory Commission** has directives for all program areas, including ethics. The agency has detailed directives in the areas of financial disclosure, advice and counsel, gift acceptance and awards, outside employment, and enforcement of post-employment restrictions. The agency requires that each directive be updated every five years unless a change is needed immediately. These directives are kept on the agency's public website and are searchable. Ethics officials commented that the directives integrate ethics into the agency's operations as well as present the ethics rules in a user-friendly manner.

Customer Feedback/Self-Assessment

Ten agencies receive feedback from their employees through the use of evaluations and surveys. Ethics officials have used feedback from training evaluations to shape training materials. For example, agency ethics officials have used training evaluations to identify effective training techniques and training topics. Seven agencies also mentioned that they conduct self-assessments of the ethics program to identify ways to improve ethics program operations. Some agencies evaluated ethics office compliance with required procedures, while other agencies evaluated effectiveness of ethics program operations.

FOR YOUR CONSIDERATION

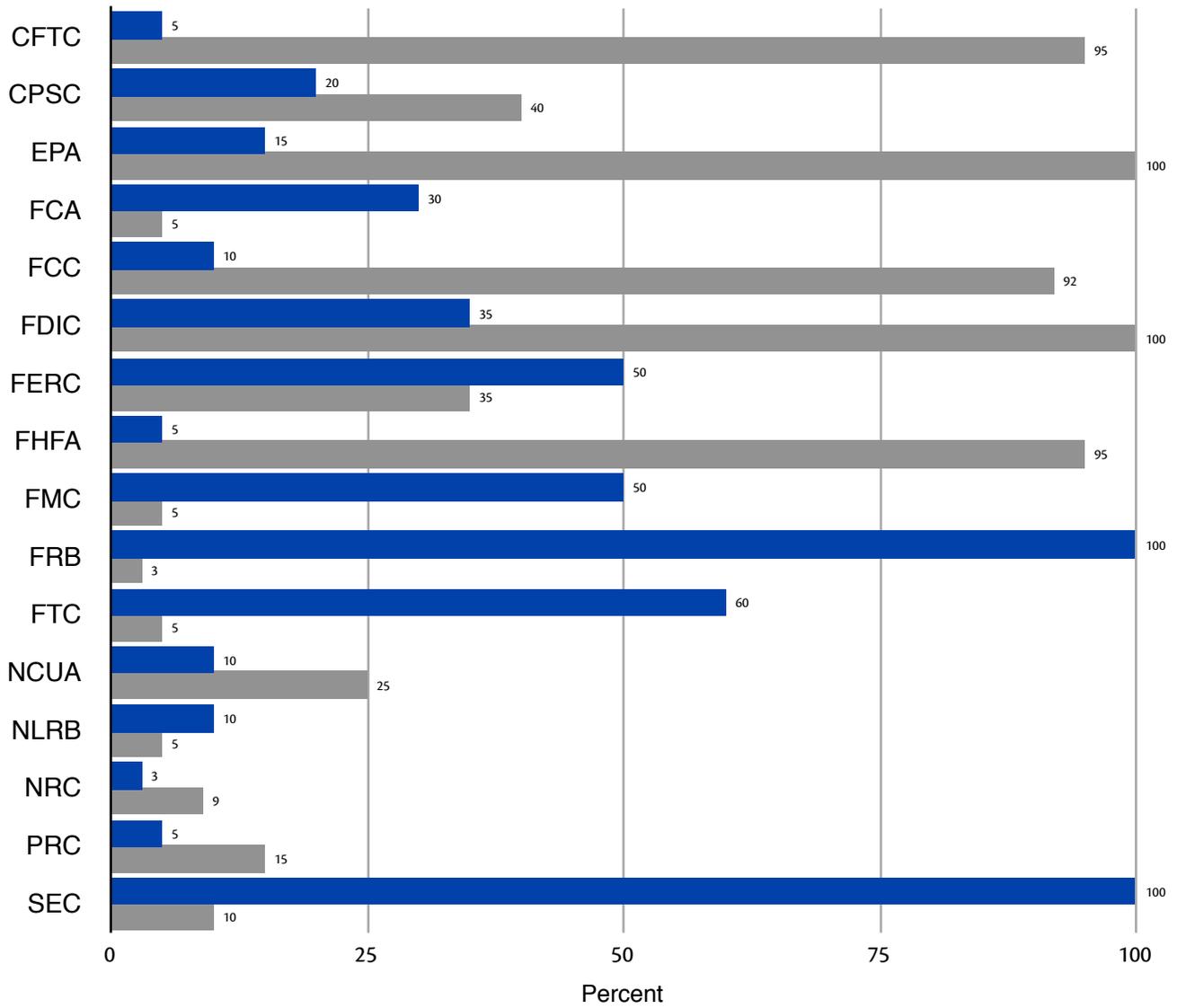
Ethics officials at the **Farm Credit Administration** conduct an annual written self-assessment of the ethics program. This report addresses all components of the ethics program, including financial disclosure review, ethics guidance and counseling, training requirements, intra-governmental liaison, and regulation and policy development. The results of the assessment are forwarded to the Chairman. Ethics officials meet with the Chairman to review the assessment and discuss ways to address any issues identified.

The **Securities and Exchange Commission** conducts annual program surveys. The agency-wide surveys are conducted in order to assess employees' awareness of the ethics office, satisfaction with services provided by ethics officials, and employees' knowledge of basic ethics rules. The results of these assessments are shared with the Chairman and the General Counsel.

PART THREE: COMPARATIVE DATA

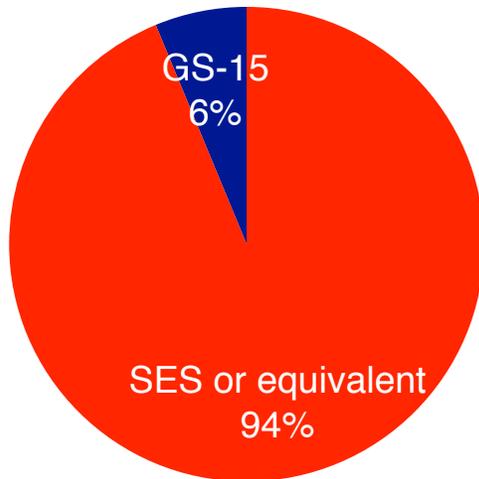
OGE created information graphics based on information provided in the *2010 Agency Ethics Program Questionnaire*. The graphics compare the percentage of time the Designated and Alternate Agency Ethics Officials spend on ethics and their grade level, the number of full-time employees, the ratio of full-time employees to ethics officials, percentage of employees who file financial disclosure reports, the ratios of public and confidential financial disclosure filers to ethics official, and the average time spent on certain aspects of the ethics program. The data included is intended to allow agencies to easily compare important aspects of their ethics program with other regulatory agencies. The quantitative data may be helpful to agencies in determining how best to allocate ethics program resources.

Figure 2: Percentage of Time DAEO and ADAEO Spends on Ethics



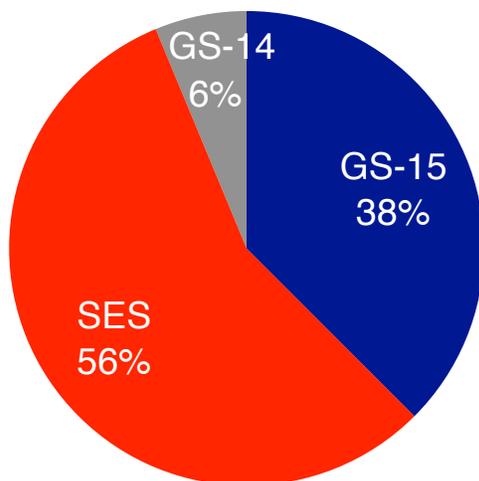
■ % of time the DAEO spent on ethics ■ % of time the ADAEO spent on ethics

Figure 3: DAEO's Grade Level



At the regulatory agencies, the DAEO position is almost exclusively occupied by individuals employed at the SES level or equivalent.

Figure 4: ADAEO's Grade Level



At the regulatory agencies, the ADAEO position is occupied by individuals employed at the SES or GS-15 level almost exclusively.

Figure 5: Percentage of Employees Who File Financial Disclosure Reports

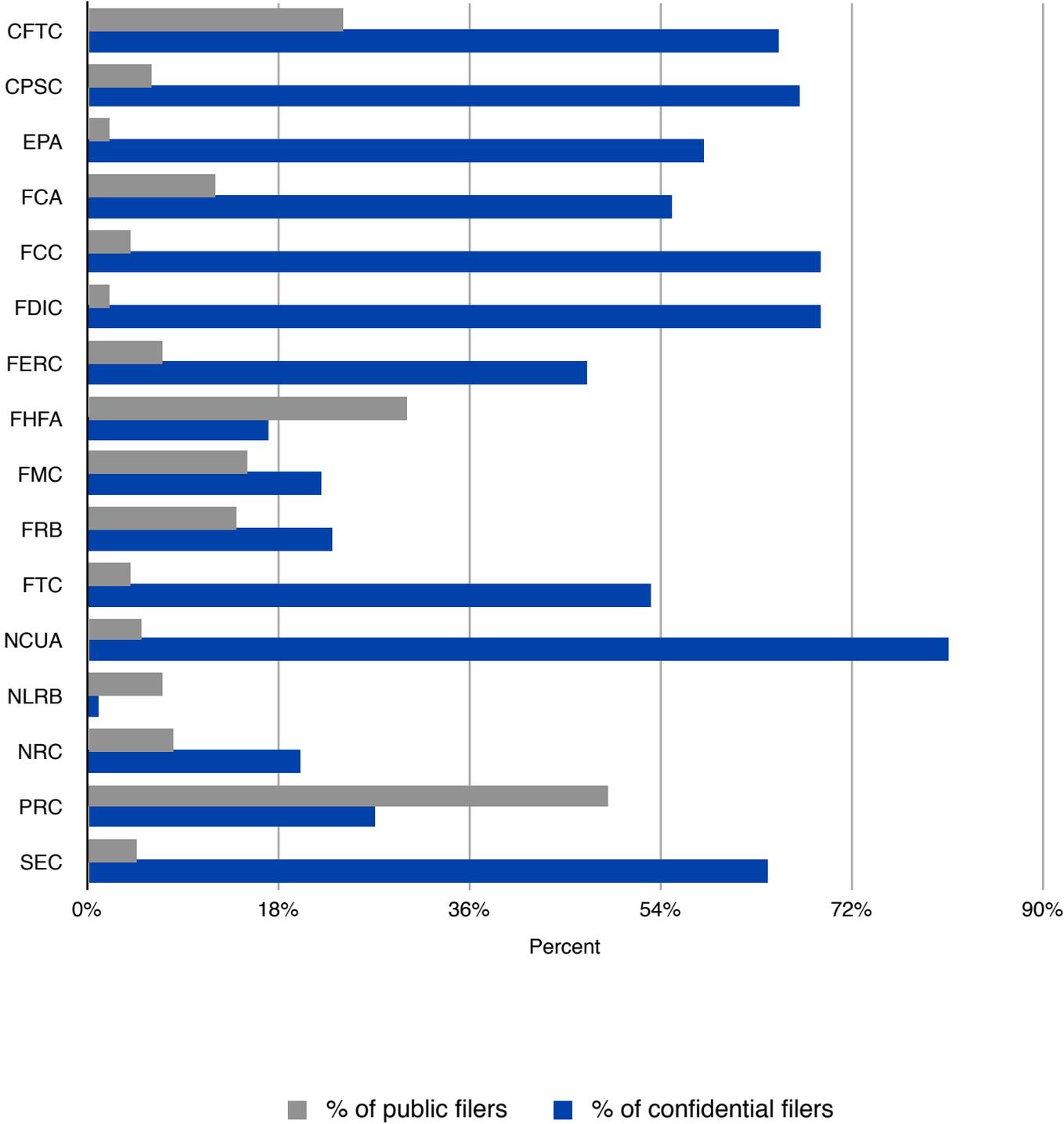


Figure 6: Number of Full-time Employees

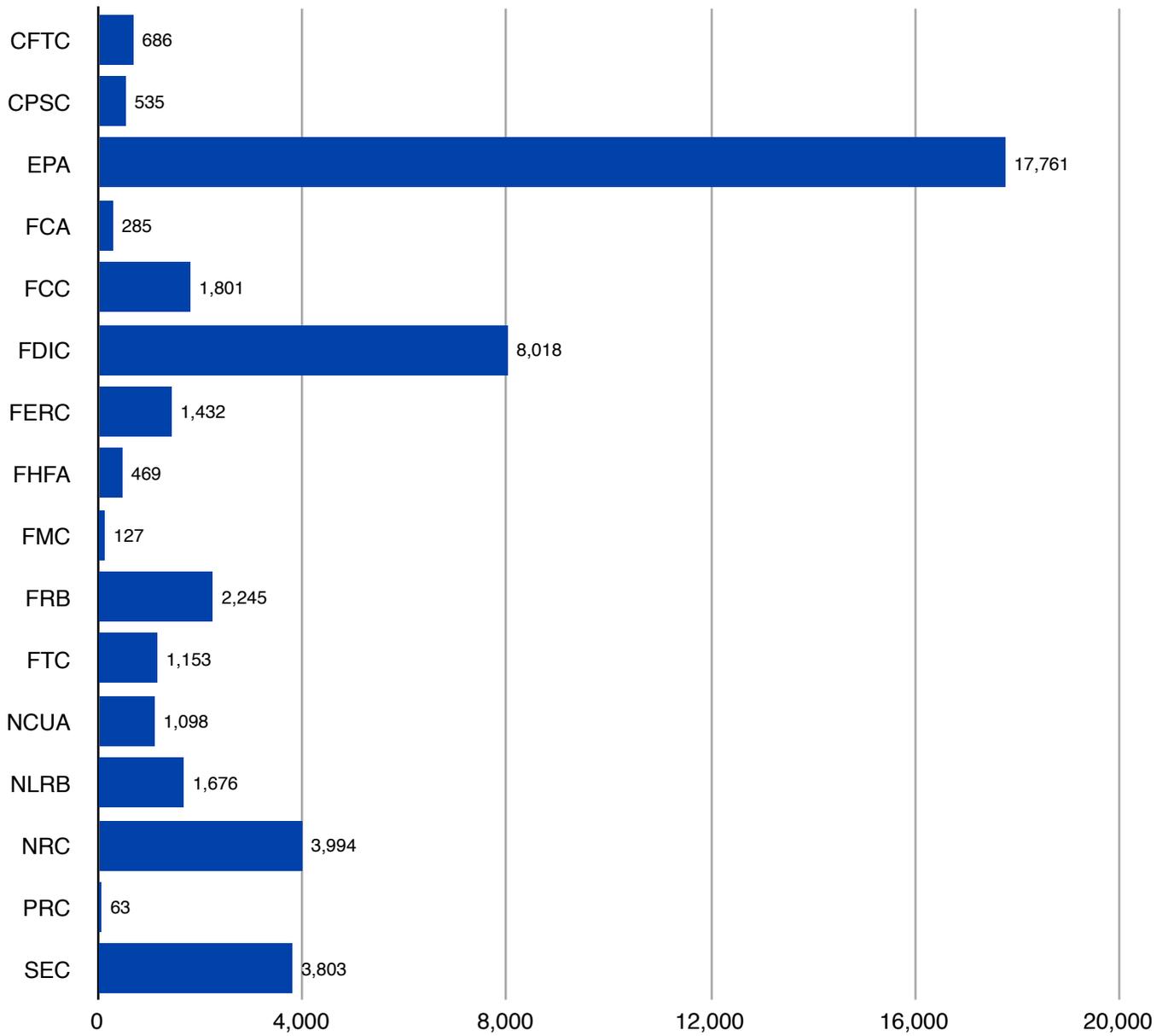


Figure 7: Number of Employees per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

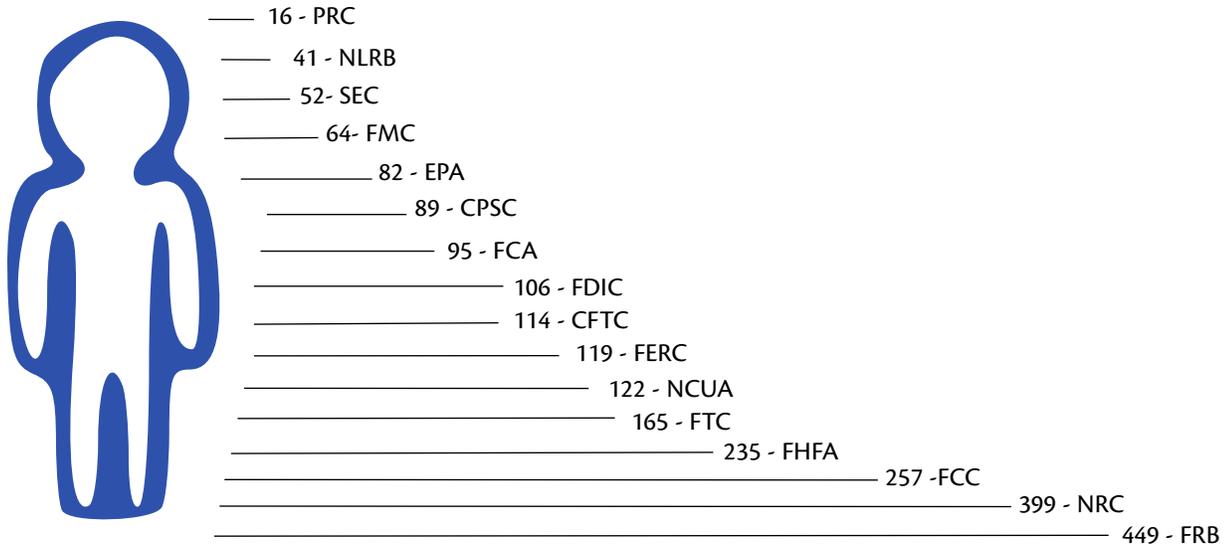


Figure 8: Number of Public Filers per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

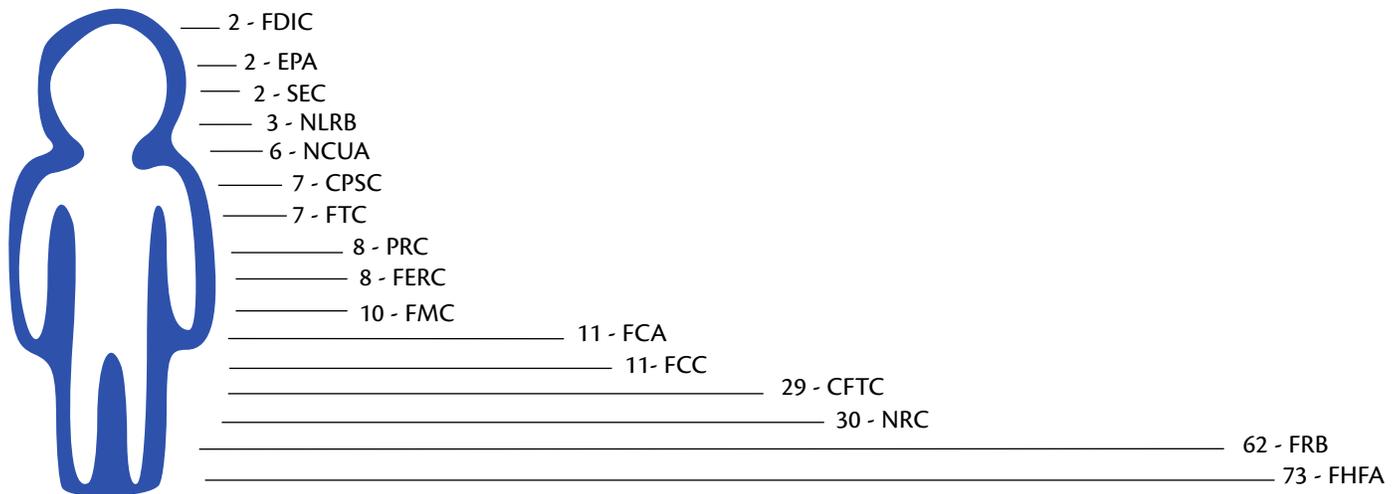


Figure 9: Number of Confidential Filers per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

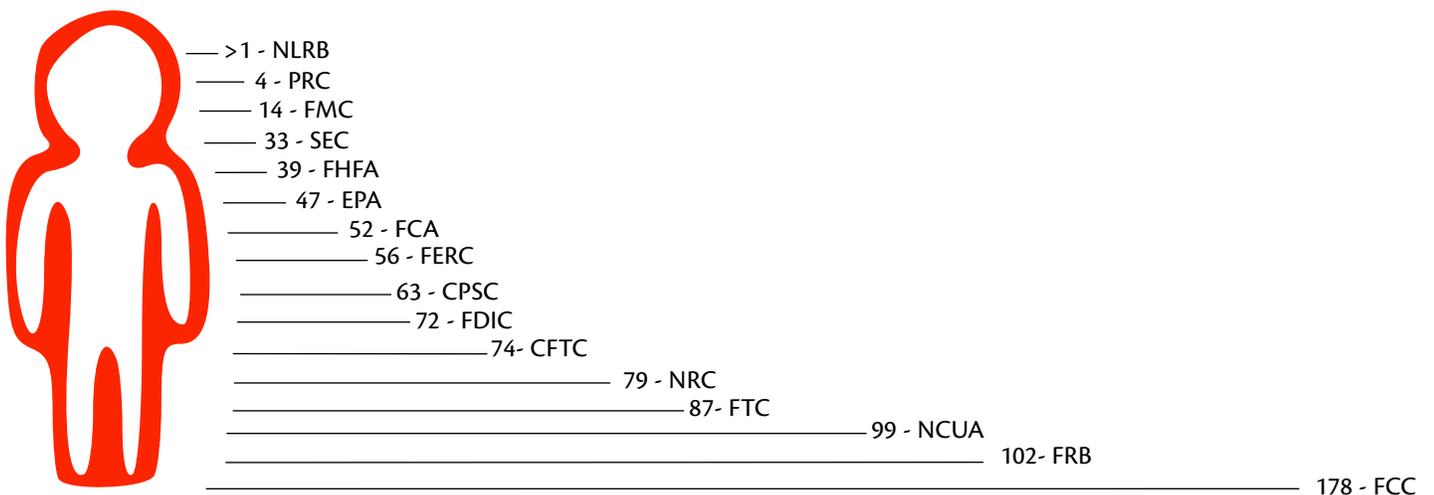
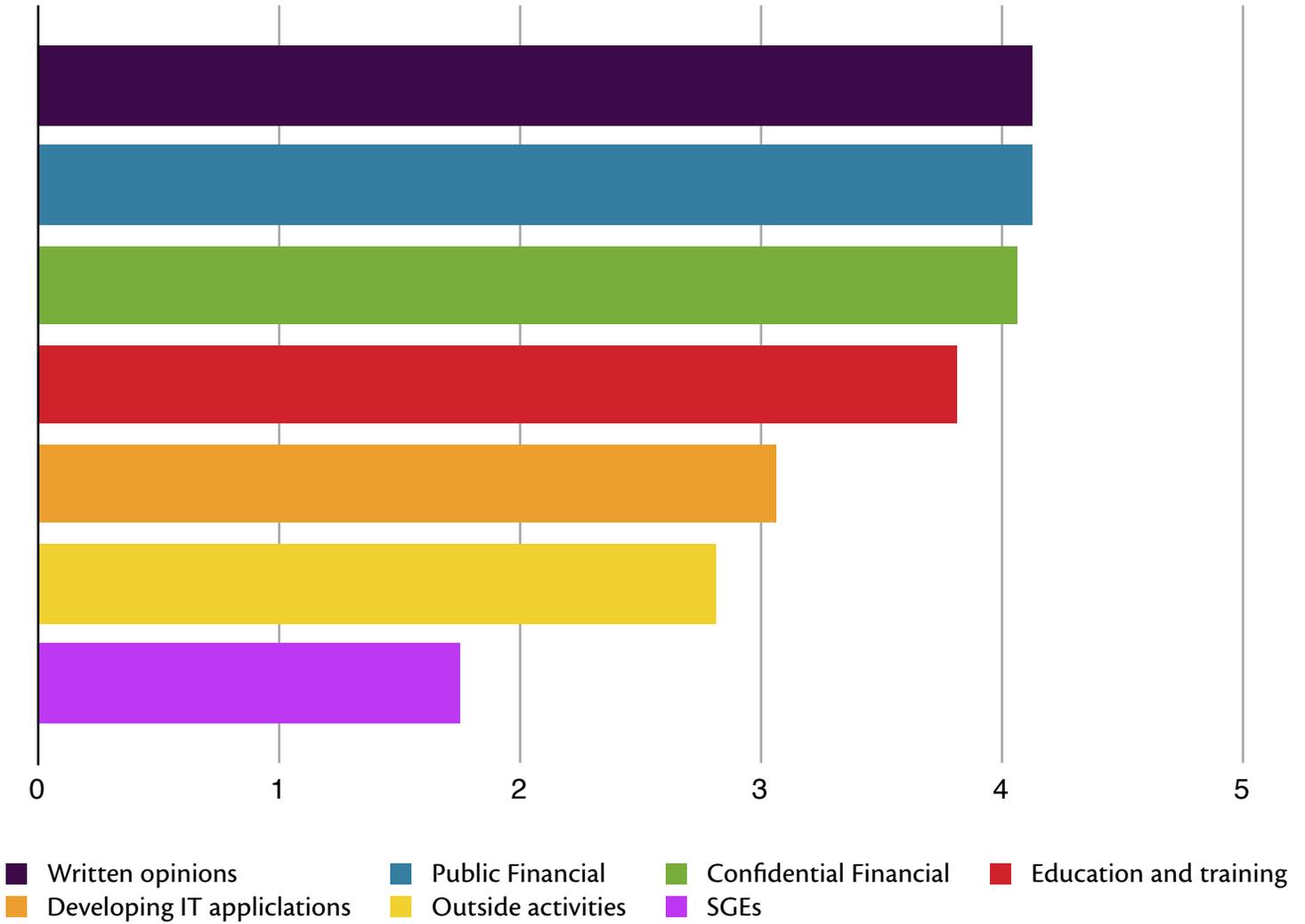


Figure 10: Average Time Spent on Aspects of the Ethics Program



Time Spent Scale: 1= No time, 2= Limited amount of time, 3= Moderate amount of time, 4= Considerable amount of time, 5= Extreme amount of time.

APPENDIX: AGENCY PROFILES



AGENCY PROFILE: COMMODITY FUTURES TRADING COMMISSION

Congress created the Commodity Futures Trading Commission (CFTC) in 1974 to regulate commodity futures and option markets in the United States. The agency's mandate has been renewed and expanded several times since then, most recently by the Commodity Futures Modernization Act, the Commodity Exchange Act, and the Dodd-Frank Wall Street Reform and Consumer Protection Act.

The CFTC's mission is to protect market users and the public from fraud, manipulation, abusive practices and systemic risk related to derivatives that are subject to the Commodity Exchange Act, and to foster open, competitive, and financially sound markets.

Full-time agency employees	686
Special Government employees	0
% of time DAEO spends on ethics	5%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	CT-18
% of time ADAEO spends on ethics	95%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	CT-14

	Full-time ethics staff	Part-time ethics staff	Total
HQ	1	2	3
Region/Field	0	3	3
Total	1	5	6

Total number of public financial disclosure reports: **172**

Total number of confidential financial disclosure reports: **553**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **5**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **105**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: CONSUMER PRODUCT SAFETY COMMISSION

The Consumer Product Safety Commission (CPSC) is charged with protecting the public from unreasonable risks of injury or death from thousands of types of consumer products under the agency's jurisdiction.

The CPSC is committed to protecting consumers and families from products that pose a fire, electrical, chemical, or mechanical hazard or can injure children.

Full-time agency employees	535
Special Government employees	0
% of time DAEO spends on ethics	20%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	40%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	6	6
Region/Field	0	0	6
Total	0	6	6

Total number of public financial disclosure reports: **41**

Total number of confidential financial disclosure reports: **375**

of advisory committees (non-FACA): 0

of FACA advisory committees: 0

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 0

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: ENVIRONMENTAL PROTECTION AGENCY

The mission of the Environmental Protection Agency (EPA) is to protect human health and the environment.

To accomplish its mission, the EPA

- Develops and enforces regulations
- Gives grants
- Studies environmental issues
- Sponsors partnerships
- Teaches people about the environment
- Publishes information

Full-time agency employees	17,761
Special Government employees	1,004
% of time DAEO spends on ethics	15%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	SL

	Full-time ethics staff	Part-time ethics staff	Total
HQ	3	126	<u>129</u>
Region/Field	0	88	<u>88</u>
Total	<u>3</u>	<u>214</u>	<u>217</u>

Total number of public financial disclosure reports: **468**

Total number of confidential financial disclosure reports: **10,431**

of advisory committees (non-FACA): 6

of FACA advisory committees: 9

of advisory committee members (non-FACA): 22

of FACA advisory committee members: 179

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FARM CREDIT ADMINISTRATION

The Farm Credit Administration (FCA) is responsible for examining and regulating the Farm Credit System, a Government-sponsored enterprise created by Congress in 1916 to provide American agriculture with a dependable source of credit. The agency was created by a 1933 Executive Order of President Franklin D. Roosevelt.

FCA's mission is to ensure a safe, sound, and dependable source of credit and related services for agriculture and rural America.

Full-time agency employees	285
Special Government employees	0
% of time DAEO spends on ethics	30%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES Equivalent
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	1 – 4 Years
Grade level of ADAEO	SES Equivalent

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	3	3
Region/Field	0	0	0
Total	0	3	3

Total number of public financial disclosure reports: **32**

Total number of confidential financial disclosure reports: **153**

of advisory committees (non-FACA): 0

of FACA advisory committees: 0

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 0

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL COMMUNICATIONS COMMISSION

The Federal Communications Commission (FCC) regulates interstate and international communications by radio, television, wire, satellite and cable in all 50 states, the District of Columbia and U.S. territories. It was established by the Communications Act of 1934 and operates as an independent U.S. government agency overseen by Congress.

FCC's goal is to be a responsive, efficient and effective agency capable of facing the technological and economic opportunities of the new millennium.

Full-time agency employees	1,801
Special Government employees	15
% of time DAEO spends on ethics	10%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	92%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	SL

	Full-time ethics staff	Part-time ethics staff	Total
HQ	4	3	7
Region/Field	0	0	0
Total	4	3	7

Total number of public financial disclosure reports: **76**

Total number of confidential financial disclosure reports: **1,257**

of advisory committees (non-FACA): **2**

of FACA advisory committees: **6**

of advisory committee members (non-FACA): **24**

of FACA advisory committee members: **272**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL DEPOSIT INSURANCE CORPORATION

The Federal Deposit Insurance Corporation (FDIC) maintains stability and public confidence in the nation's financial system by

- insuring deposits,
- examining and supervising financial institutions for safety and soundness and consumer protection, and
- managing receiverships.

Full-time agency employees	8,018
Special Government employees	0
% of time DAEO spends on ethics	35%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	CM-2
% of time ADAEO spends on ethics	100%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	CM-1

	Full-time ethics staff	Part-time ethics staff	Total
HQ	7	0	7
Region/Field	0	69	69
Total	7	69	76

Total number of public financial disclosure reports: **138**

Total number of confidential financial disclosure reports: **5,491**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL ENERGY REGULATORY COMMISSION

The Federal Energy Regulatory Commission (FERC) regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas terminals and interstate natural gas pipelines as well as licensing hydropower projects. The Energy Policy Act of 2005 gave FERC additional responsibilities as outlined on its website at www.ferc.gov.

Full-time agency employees	1,432
Special Government employees	0
% of time DAEO spends on ethics	50%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	SL
% of time ADAEO spends on ethics	35%
Length of time ADAEO has held position	Less than 1 year
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	12	<u>12</u>
Region/Field	0	0	<u>0</u>
Total	<u>0</u>	<u>12</u>	<u>12</u>

Total number of public financial disclosure reports: **99**

Total number of confidential financial disclosure reports: **671**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL HOUSING FINANCE AGENCY

The Federal Housing Finance Agency (FHFA) was created on July 30, 2008, when the President signed into law the Housing and Economic Recovery Act of 2008. The Act gave FHFA the authorities necessary to oversee vital components of the country's secondary mortgage markets – Fannie Mae, Freddie Mac, and the Federal Home Loan Banks.

FHFA's mission is to provide effective supervision, regulation and housing mission oversight of Fannie Mae, Freddie Mac and the Federal Home Loan Banks to promote their safety and soundness, support housing finance and affordable housing, and support a stable and liquid mortgage market.

Full-time agency employees	469
Special Government employees	0
% of time DAEO spends on ethics	5%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	LL-1
% of time ADAEO spends on ethics	95%
Length of time ADAEO has held position	Less than 1 year
Grade level of ADAEO	EL-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	1	1	2
Region/Field	0	0	0
Total	1	1	2

Total number of public financial disclosure reports: **146**

Total number of confidential financial disclosure reports: **78**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL MARITIME COMMISSION

The Federal Maritime Commission (FMC) is responsible for the regulation of oceanborne transportation in the foreign commerce of the U.S. The principal statutes or statutory provisions administered by the Commission are: the Shipping Act of 1984, the Foreign Shipping Practices Act of 1988, section 19 of the Merchant Marine Act of 1920, and Public Law 89-777 (Financial Responsibility for Death or Injury to Passengers and for Nonperformance of Voyages).

Full-time agency employees	127
Special Government employees	0
% of time DAEO spends on ethics	50%
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	GS-15
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	Less than 1 year
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	2	<u>2</u>
Region/Field	0	0	<u>0</u>
Total	<u>0</u>	<u>2</u>	<u>2</u>

Total number of public financial disclosure reports: **20**

Total number of confidential financial disclosure reports: **28**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL RESERVE BOARD

The Board of Governors of the Federal Reserve System is composed of seven members who are appointed by the President of the United States and confirmed by the U.S. Senate.

The Board's responsibilities require thorough analysis of domestic and international financial and economic developments. The Board carries out those responsibilities in conjunction with other components of the Federal Reserve System. The Board of Governors also supervises and regulates the operations of the Federal Reserve Banks, exercises broad responsibility in the Nation's payments system, and administers most of the Nation's laws regarding consumer credit protection.

Full-time agency employees	2,245
Special Government employees	0
% of time DAEO spends on ethics	100%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	Officer
% of time ADAEO spends on ethics	3%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	Officer

	Full-time ethics staff	Part-time ethics staff	Total
HQ	2	3	5
Region/Field	0	0	0
Total	2	3	5

Total number of public financial disclosure reports: **311**

Total number of confidential financial disclosure reports: **508**

of advisory committees (non-FACA): 0

of FACA advisory committees: 0

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 0

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: FEDERAL TRADE COMMISSION

The Federal Trade Commission (FTC) is the only federal agency with both consumer protection and competition jurisdiction in broad sectors of the economy. The FTC pursues vigorous and effective law enforcement; advances consumers' interests by sharing its expertise with federal and state legislatures and U.S. and international government agencies; develops policy and research tools through hearings, workshops, and conferences; and creates practical and plain-language educational programs for consumers and businesses in a global marketplace with constantly changing technologies.

Full-time agency employees	1,153
Special Government employees	16
% of time DAEO spends on ethics	60%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	GS-15

	Full-time ethics staff	Part-time ethics staff	Total
HQ	<u>1</u>	<u>6</u>	<u>7</u>
Region/Field	<u>0</u>	<u>0</u>	<u>0</u>
Total	<u>1</u>	<u>6</u>	<u>7</u>

Total number of public financial disclosure reports: **51**

Total number of confidential financial disclosure reports: **611**

of advisory committees (non-FACA): 0

of FACA advisory committees: 0

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 0

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: NATIONAL CREDIT UNION ADMINISTRATION

The National Credit Union Administration (NCUA) regulates, charters, and supervises federal credit unions. The mission of the NCUA is to facilitate the availability of credit union services to all eligible consumers, especially those of modest means, through a safe and sound credit union system.

Full-time agency employees	1,098
Special Government employees	0
% of time DAEO spends on ethics	10%
Length of time DAEO has held position	5 – 9 years
Grade level of DAEO	Senior Staff
% of time ADAEO spends on ethics	25%
Length of time ADAEO has held position	5 – 9 years
Grade level of ADAEO	Senior Staff

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	4	4
Region/Field	0	5	5
Total	0	9	9

Total number of public financial disclosure reports: **48**

Total number of confidential financial disclosure reports: **888**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: NATIONAL LABOR RELATIONS BOARD

The National Labor Relations Board is vested with the power to safeguard employees' rights to organize and to determine whether to have unions as their bargaining representative. The agency also acts to prevent and remedy unfair labor practices committed by private sector employers and unions.

Full-time agency employees	1,676
Special Government employees	0
% of time DAEO spends on ethics	10%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	5%
Length of time ADAEO has held position	1 – 4 years
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	4	<u>4</u>
Region/Field	0	37	<u>37</u>
Total	<u>0</u>	<u>41</u>	<u>41</u>

Total number of public financial disclosure reports: **116**

Total number of confidential financial disclosure reports: **17**

of advisory committees (non-FACA): 0

of FACA advisory committees: 0

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 0

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: NUCLEAR REGULATORY COMMISSION

The Nuclear Regulatory Commission (NRC), as a collegial body, formulates policies, develops regulations governing nuclear reactor and nuclear material safety, issues orders to licensees, and adjudicates legal matters. The NRC is headed by a five-member Commission. The President designates one member to serve as Chairman and official spokesperson.

Full-time agency employees	3,994
Special Government employees	69
% of time DAEO spends on ethics	3%
Length of time DAEO has held position	1 – 4 years
Grade level of DAEO	SES
% of time ADAEO spends on ethics	9%
Length of time ADAEO has held position	Less than 1 year
Grade level of ADAEO	SES

	Full-time ethics staff	Part-time ethics staff	Total
HQ	2	4	<u>6</u>
Region/Field	0	4	<u>4</u>
Total	<u>2</u>	<u>8</u>	<u>10</u>

Total number of public financial disclosure reports: **310**

Total number of confidential financial disclosure reports: **866**

of advisory committees (non-FACA): 0

of FACA advisory committees: 3

of advisory committee members (non-FACA): 0

of FACA advisory committee members: 39

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					

AGENCY PROFILE: POSTAL REGULATORY COMMISSION

The Postal Regulatory Commission (PRC) has jurisdiction over changes in postal rates and fees, and over mail classifications. PRC issues recommended decisions to the Governors of the Postal Service on these matters. It also acts on postal patrons' appeals from Postal Service decisions to close or consolidate post offices. Further, PRC investigates complaints of substantial national scope concerning postal rates, fees, mail classifications or services. It also responds to requests of the Postal Service for advisory opinions on changes in the nature of postal services. Because of PRC's expertise, Congress occasionally asks it to undertake special studies on postal issues.

Full-time agency employees	63
Special Government employees	0
% of time DAEO spends on ethics	5%
Length of time DAEO has held position	10 or more years
Grade level of DAEO	PRC 8
% of time ADAEO spends on ethics	15%
Length of time ADAEO has held position	10 or more years
Grade level of ADAEO	PRC 7

	Full-time ethics staff	Part-time ethics staff	Total
HQ	0	4	4
Region/Field	0	0	0
Total	0	4	4

Total number of public financial disclosure reports: **31**

Total number of confidential financial disclosure reports: **17**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **0**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **0**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					



AGENCY PROFILE: SECURITIES AND EXCHANGE COMMISSION

The mission of the Securities and Exchange Commission is to protect investors; maintain fair, orderly, and efficient markets; and facilitate capital formation.

It is the responsibility of the Commission to interpret federal securities laws; issue new rules and amend existing rules; oversee the inspection of securities firms, brokers, investment advisers, and ratings agencies; oversee private regulatory organizations in the securities, accounting, and auditing fields; and coordinate U.S. securities regulation with federal, state, and foreign authorities.

Full-time agency employees	3,803
Special Government employees	7
% of time DAEO spends on ethics	100%
Length of time DAEO has held position	Less than 1 year
Grade level of DAEO	SO
% of time ADAEO spends on ethics	10%
Length of time ADAEO has held position	1 – 4 years
Grade level of ADAEO	SO

	Full-time ethics staff	Part-time ethics staff	Total
HQ	12	33	45
Region/Field	0	28	28
Total	12	61	73

Total number of public financial disclosure reports: **174**

Total number of confidential financial disclosure reports: **2,418**

of advisory committees (non-FACA): **0**

of FACA advisory committees: **1**

of advisory committee members (non-FACA): **0**

of FACA advisory committee members: **10**

Time agency spends on administering the ethics program:

	No time	Limited time	Moderate time	Considerable time	Extreme time
Public financial Disclosure (SF 278)					
Confidential Financial Disclosure (450)					
Outside Activity approval programs					
Written opinions and counseling					
Education and Training					
Special Government employee activities					
Developing information technology applications					