
UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

Fiscal Year 2013

Explanatory Notes and Annual Performance Plan

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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 2011 through 2013 Priorities Overview

OGE has identified and developed strategies to accomplish four budget priorities during fiscal years 2011 through 2013. 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 year 2011 through fiscal year 2013 are to:

- Ensure that the influx of new Presidential appointees following the 2012 election are free of financial conflicts of interest;
- Modernize government ethics laws, regulations, and programs;
- Harness technology to promote transparency, training, and oversight; and
- Promote continuity and succession planning in the Executive Branch ethics program.

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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, 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 for Executive Branch employees. Specifically, OGE promulgates and maintains enforceable standards of ethical conduct for over four 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 agency 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 80 full-time equivalents, and accomplishes its broad 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 2012 and fiscal year 2013 support the three goals set out in OGE's five-year strategic plan.¹ The daily work of OGE is driven by performance measures for the objectives established for each of these goals:

Strengthening the ethical culture within the Executive Branch: OGE strives to improve the effectiveness of ethics policies, 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.

¹ OGE is updating the agency's five-year strategic plan in compliance with the requirements of the Government Performance and Results Modernization Act (Pub. L. 111-352). The plan builds on the successes of OGE over the past few years.

Promoting good governance: OGE supports and cooperates with federal, state, and local agencies implementing programs that foster good governance; enhances outreach to the public sector, private sector, and civil society; and supports United States foreign policy anti-corruption and good governance initiatives.

Section II – Budget Request Overview

A. Budget Request Overview Narrative

OGE is requesting \$13,473,400 in appropriated funds for fiscal year 2013. This request represents a decrease from fiscal year 2011 enacted funding. This level of funding will allow OGE to support its core mission programs as OGE heads into one of the agency’s busiest times: the 2012 post-election period. In addition to the agency’s other statutory responsibilities, OGE has a duty to ensure that Presidential appointees requiring Senate confirmation are free of financial conflicts of interest, a workload that will double over fiscal year 2011 if the President is re-elected and triple if there is a new Administration.

In fiscal year 2013, OGE is proposing to reduce by nearly 75 percent over fiscal year 2010 its administrative costs associated with travel, information technology devices, printing and reproduction, and supplies.² OGE has already maximized the possible efficiencies and cost savings available through the use of shared service centers by using the services of the Bureau of Public Debt for all of OGE’s non-core administrative support services. If compelled to make further significant reductions, OGE would be forced to reduce the number of professional staff it has to complete its core mission functions at a very vulnerable time for the Executive Branch and its ethics program. In addition, should significant legislation reforming the Ethics in Government Act be enacted in FY12/13, OGE would require additional funds to implement any such new responsibilities.

² See Table 2 below for detail.

B. Budget Request By Object Classification

The object classification in Table 1 set forth below summarizes OGE's request (in thousands of dollars). Table 2 summarizes OGE cost savings over fiscal year 2010 in certain object classes.

Table 1: Budget Request by Object Classification in (000's)

		2011	2012	2013
	<u>Object Class</u>	<u>Actual</u>	<u>Appropriated</u>	<u>Request</u>
11.1	Salaries	\$8,358	\$8,904	\$8,304
12.1	Benefits	\$2,214	\$2,115	\$2,184
21.0	Travel	\$53	\$48	\$48
22.0	Transportation (Freight)	\$2	\$3	\$3
23.1	Rental Payments to GSA	\$1,534	\$1,480	\$1,481
23.2	Rental Payments to Others	\$23	\$15	\$15
23.3	Communications and Utilities	\$57	\$57	*\$112
24.0	Printing and Reproduction	\$15	\$20	\$1
25.2	Other Services	\$1,246	\$879	\$1,115
26.0	Supplies and Materials	\$89	\$111	\$123
31.0	Equipment	\$313	\$32	\$87
99.00	Subtotal	\$13,904	\$13,664	\$13,473
99.00	Reimbursable	<u>\$555</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$14,459	\$14,389	\$14,198

* Increased cost due to OMB/DHS Mandated Trusted Internet Protocol Service (MTIPS)

OGE has proposed significant reductions in administrative costs over fiscal year 2010 as reflect in Table 2 below.

Table 2: Reduction of Certain Costs from FY2010 to FY2013 by Object Classification in (000's)

Object Class	FY2010 Actual	FY2013 Request	Percent Reduction
21.0 Travel	\$58	\$48	17%
24.0 Printing & Reproduction	\$31	\$1	97%
26.0 Supplies & Materials	\$138	\$123	11%
31.0 Equipment*	\$788^	\$87	89%
TOTAL	\$1,015	\$259	74%

*NOTE: OGE does not have any fleet vehicles.

^NOTE: Approximately \$500,000 of this total was spent to replace the agency's information technology infrastructure.

Section III – Fiscal Year 2011 Accomplishments

Leading and shaping Executive Branch ethics policies and programs is OGE's primary mission. In this role, OGE identified three budget priorities on which to focus for fiscal year 2010 and subsequent years that support its strategic goals of strengthening the ethical culture within the Executive Branch, preventing conflicts of interest, and promoting good governance. Those budget priorities are:

- Modernizing 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 2011 toward these budget priorities are discussed below.

A. Priority 1 – Modernizing Government Ethics Laws, Regulations, and Programs

An important ongoing priority of OGE is to modernize government ethics laws, regulations, and programs. In fiscal year 2011, OGE made significant strides toward this priority. Highlights of OGE's efforts in fiscal year 2011 include:

Modernizing Executive Branch Ethics Laws

- Implementing the President's Executive Order on Ethics (E.O. 13490) by submitting for public comment a proposed lobbyist gift ban rule that would extend certain restrictions beyond Presidential appointees to the entire Executive Branch workforce and by publishing the second report to the President on the implementation of the Ethics Pledge.
- Collaborating with other agencies and entities to develop effective and efficient solutions to key policy issues such as: (1) contributing to the development of a recommendation regarding ethics oversight of government contractors by the Administrative Conference of the United States; (2) partnering with the Office of Federal Procurement Policy to build greater collaboration and communication between the procurement and ethics communities on issues of common concern; (3) working with the Office of Special Counsel in the development of OGE-published guidance on Executive Branch employees running for and holding nonpartisan elective offices; and (4) hosting a panel composed of ethics officials from all three branches of government to discuss implementation of the Ethics in Government Act.
- Undertaking regulatory reform to address outstanding issues concerning: (1) the official participation of federal officers and employees in boards of nonprofit organizations in their official capacities; (2) federal employees seeking transfer to international organizations; (3) qualified diversified and blind trusts; and (4) the applicability of certain regulatory exemptions to unit investment trusts.
- Representing the Executive Branch ethics community to the Congress and providing ethics expertise on legislative proposals with Executive Branch-wide implications to numerous congressional committees regarding ethics related proposals or the need for Executive Branch ethics reforms. OGE also published a legal advisory and revised compilation of federal ethics laws to keep ethics officials up to date on key legislative developments affecting the federal ethics community and individual agencies, including input on proposals to streamline the PAS nominee confirmation process.

Modernizing Executive Branch Ethics Programs

- Completing the benchmarking review of cabinet-level programs launched in fiscal year 2010 to provide the cabinet-level agency heads and Designated Agency Ethics Officials with useful written guidance for charting and measuring improvements to their programs and to identify vulnerabilities and model practices relevant to the broader ethics community. The success of the first benchmarking review spurred the benchmarking of regulatory agencies, which began in the second quarter of fiscal year 2011.

Assisting Other Governments in Modernizing their Ethics Laws and Programs

- Sharing good governance practices with state and local government agencies whose responsibilities include ethics and with non-government organizations studying ethical culture in the private and government sectors.
- Representing the United States in three evaluations of its adherence to certain international anti-corruption agreements, including the United Nations Convention Against Corruption (1st round review of implementation), the Inter-American Convention Against Corruption's MESICIC (4th round), and the Council of Europe's GRECO (3rd round), for which OGE also served as the U.S. coordinator and host for the on-site visit of the evaluation teams.
- Representing the United States at anti-corruption and good governance meetings of international organizations of which the United States is a member, such as 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 US-China Joint Liaison Group, and the Asia-Pacific Economic Cooperation (where, in support of the U.S. serving as the 2011 host economy, OGE organized and hosted a workshop on effective financial/asset disclosure systems).
- Engaging in mutually beneficial discussions with representatives of good governance programs throughout the world by meeting with 52 foreign delegations, totaling 571 persons from 73 countries, at the request of U.S. foreign policy agencies.

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

OGE made significant strides in fiscal year 2011 toward achieving another of its budget priorities: increasing the use of technology to improve transparency in the ethics program and enhance training and oversight of agency ethics programs. Highlights of OGE's efforts in fiscal year 2011 include:

Providing Transparency

- Completely overhauling OGE's website and its search capabilities to significantly increase transparency and dramatically improve public access to thousands of government ethics documents. In addition to the aesthetic and navigation improvements, OGE added and improved a significant amount of content for the site through the development of an advanced content management system. OGE ensured that this, its largest information technology acquisition, was delivered on time and on budget. OGE has developed a plan to provide immediate access to certified public financial disclosure reports from the OGE website.
- Developing an electronic process for making publicly available on OGE's new 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 carries out its customer service mandate.

- Creating a new Freedom of Information Act (FOIA) web page on OGE's website and continuing to maintain an effective, 100 percent on-time FOIA program.

Delivering Training

- Developing and delivering on-demand, self-paced tutorials and live, instructor-led, web-based training directed at ethics officials, Inspectors General staff, and Executive Branch employees generally. OGE doubled the amount of live, instructor-led web-based training courses offered over the previous fiscal year.
- Delivering the 18th National Government Ethics Training Conference, the theme of which was "Organizational Integrity: A Shared Responsibility." The conference was attended by 850 Executive Branch ethics officials, Inspector General officials and representatives from ethics programs of international organizations of which the United States is a member. Notably, in keeping with the conference theme, also attending were human resource and IT officials who play a key role in ethics programs.
- Successfully administering an educational game called iSpy, Operation: Ethics Infiltration at the 18th National Government Ethics Training Conference. The purpose of the game was to help conference attendees expand their professional networks, apply knowledge gained at the conference, identify ethics program model practices, and learn about alternative instructional methods. This training tool was a large success and OGE was selected to present that game at the E-Learning Guild's 2012 Learning Solutions Conference – a premier event tailored for government and private sector professionals dedicated to using technology to improve organizational learning and development.

Supporting the Oversight of Agency Ethics Programs

- Initiating work on the replacement of OGE's Financial Disclosure Tracking System (FDTS) and the development of a client management system called the Agency Information Management System (AIMS). These systems will enable OGE to track critical information about thousands of public financial disclosure reports and related materials (FDTS) and incoming requests for guidance from over 130 Executive Branch agencies and other organizations (AIMS).

C. Priority 3 – Promoting Continuity and Succession Planning in the Executive Branch Ethics Program

In leadership of the Executive Branch ethics community, OGE set as a third budget priority promoting continuity and succession planning in the overall Executive Branch and its ethics program. This priority includes activities to ensure key positions in the Administration are filled and the Executive Branch ethics program continues to develop capacity. Highlights of OGE's efforts in fiscal year 2011 include:

Supporting Continuity in the Executive Branch

- Exceeding previously stated objectives for the review of public financial disclosure reports of PAS nominees. In fiscal year 2011, OGE reviewed the reports of nominees for approximately 300 of the roughly 1200 PAS positions. These reviews included resolving financial disclosure issues and negotiating ethics agreements. By the end of fiscal year 2011, OGE reviewed more financial disclosure reports than the total number of existing PAS positions in the Executive Branch since the beginning of the Administration.
- Working with the Federal Election Commission regarding the review of the public financial disclosure reports of Presidential candidates to ensure that candidates received OGE guidance on the requirements to prepare their financial disclosure reports. OGE also made those reports available to the public.

Creating Continuity in the Executive Branch Ethics Program

- Increasing the number and qualifications of OGE financial disclosure reviewers in order to prepare for the post-2012 election period. In fiscal year 2011, OGE identified additional existing professional staff for participation in a newly developed, comprehensive agency training program in preparation for the increase in OGE's workload related to nominee reports, which will occur regardless of the outcome of the Presidential election.
- Developing and conducting advanced financial disclosure training for agency ethics officials that resulted in more than a 100 officials demonstrating increased skills for conducting difficult nominee financial disclosure reviews.
- Supporting the vital work of Inspectors General to investigate alleged ethical misconduct by regularly attending the meetings of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and the Executive Council on Integrity and Efficiency (ECIE), providing ongoing training at the Inspector General Academy, inviting active participation at OGE's national ethics conference, and regularly providing expertise to prosecutors and investigators concerning the interpretation and application of the conflict of interest laws and ethics rules.

- Enhancing OGE’s statutorily mandated oversight activities by increasing the number of on-site program reviews OGE conducts to ensure that programs are complying with regulatory requirements, documenting essential processes and procedures, and providing optimal support to federal employees. Oversight also enables OGE to identify vulnerabilities and disseminate model practices effectively.
- Resolving hundreds of complex ethics issues implicating the government ethics laws and rules raised by ethics officials throughout the Executive Branch.

Preparing for Succession in the Executive Branch Ethics Program

- Developing an honors attorney program at OGE with existing positions to create a pathway for entry level attorneys to enter the federal government and the ethics field. Through training and experience at OGE, the agency is preparing tomorrow’s leaders in the ethics community.
- Developing an ethics official certification program to identify the essential competencies needed to be an effective ethics official and to delineate a clear path that ethics officials can take to build a career in government ethics.
- At its national training conference, OGE developed and presented an extensive range of training modules on topics as varied as emerging ethics issues, program management, and continuity and succession planning. Of the 850 conference attendees, 43 percent had no more than 3 years of ethics experience and 89 percent of attendees responded that they were inspired to continue working in the field of ethics as a result of the conference. Conference materials were electronically archived, and selected presentations were recorded to facilitate on-demand distribution.

Section IV – Fiscal Years 2012 and 2013 Budget and Performance Plan Priorities

In fiscal years 2012 and 2013, OGE will prioritize its responsibility for reviewing and certifying the surge of public financial disclosure reports resulting from the 2012 Presidential election. OGE also will use the momentum from fiscal year 2011 to continue to advance its prior three budget 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 work to:

- Ensure that the influx of new Presidential appointees following the 2012 election are free of financial conflicts of interest;
- Modernize government ethics laws, regulations, and programs;
- Harness technology to promote transparency, training, and oversight; and

- Promote continuity and succession planning in the Executive Branch ethics program.

A. Priority 1 – Ensuring that the Influx of New Presidential Appointees Following the 2012 Election are Free of Financial Conflicts of Interest

OGE plays a vital role in the period after a Presidential election whether for a second term for the sitting President or for a new Administration. OGE reviews, with the help of the White House and Executive Branch agencies, 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 with integrity.

In fiscal years 2012 and 2013, these responsibilities will be OGE’s highest priority. OGE will undertake three key initiatives to fulfill these duties: the creation of a web-based, plain English guide for financial disclosure filers; training on financial disclosure for OGE and Executive Branch agency staff; and program review and support to ensure agencies are prepared for the post-election.

1. Creation of a Web-Based, Plain English Guide for Financial Disclosure Filers

During fiscal year 2012, OGE will complete the design and implementation of a web-based guide to educate and assist senior officials required to complete public financial disclosure reports. This has been, and will continue to be, a major undertaking because the guide will cover a broad range of information that is required to be reported on the public financial disclosure report, and it will be written in plain English. When published on OGE’s new website, this will be the first web-based comprehensive guide on public financial disclosure reporting for senior officials, and will increase the efficiency of the financial disclosure process by improving the quality of the initial drafts of financial disclosure reports submitted by PAS nominees. By clarifying the reporting requirements in plain English, this tool will eliminate many of the errors typically found in financial disclosure reports, thereby helping to expedite the ethics clearance of PAS nominees.

2. Training to Prepare Financial Disclosure for Succession

OGE’s top priority agency-wide for fiscal year 2012 is its preparation for the election and post-election periods in fiscal years 2012 and 2013. Specifically, in fiscal year 2012, OGE will prepare its staff and agency ethics officials for the anticipated increase in volume of financial disclosure filings by PAS nominees that will occur in fiscal year 2013 and beyond, following the 2012 Presidential election. Based on past experience, the volume of nominee financial disclosure filings in 2013 will increase regardless of the outcome of the election.

To prepare for this in fiscal year 2012, OGE will build internal capacity and conduct focused training for its staff involved in the financial disclosure process. OGE uses a cross-functional approach to staffing the nominee programs and therefore will redirect resources from other programs to successfully review the increased volume of nominee financial disclosure

reports during the post-election period. OGE staff will complete extensive nominee financial disclosure training, as well as hands-on experiential learning through an increased volume of assignments of nominee financial disclosure reports through the year.

OGE also will conduct training for nominee financial disclosure reviewers at agencies throughout the Executive Branch and will meet with certain key Executive Branch agency ethics officials to support them in their own preparations for this increased volume in the post-election period. In addition, OGE will communicate and arrange meetings with representatives of Presidential candidates' campaign teams prior to the election to provide detailed information on the legal requirements for financial disclosure that the Executive Branch ethics program imposes.

With the departure of non-career officials that normally follows any Presidential election, OGE will enhance its programs to provide legal guidance and training to Executive Branch agencies regarding restrictions on seeking employment and post-government employment activities.

3. Expand Research Tools for Review of Presidential Nominee Investments

OGE staff members research companies and investment funds held by PAS nominees to resolve potential conflicts of interest. To facilitate the review of the increased volume of nominee financial disclosure reports during the post-election period, OGE will subscribe to an online research service that will provide quicker access to information on companies and investment funds.

4. Ensure that Agency Ethics Programs are Prepared for the Post-2012 Presidential Election Period

In fiscal year 2012, OGE will assess the readiness of selected agencies—those agencies with the greatest number of PAS positions—to handle the increase in volume of financial disclosure filings associated with the post-election period in fiscal year 2013. This OGE review will provide guidance to agency ethics officials about ways in which to structure and execute ethics programs to provide effective service to PAS nominees. Specifically, OGE will determine current capabilities and future planning related to financial disclosure report processes and identify potential vulnerabilities that could impair the ability of agency ethics officials to conduct timely, accurate, and consistent conflict of interest reviews. OGE will also identify and disseminate best practices throughout the Executive Branch and develop training to prepare the ethics community for an efficient and effective post-election.

B. Priority 2 – Modernizing Government Ethics Laws, Regulations, and Programs

Building on the momentum created by its initiatives to modernize ethics laws, regulations, and programs from prior fiscal years, OGE will continue these efforts in fiscal years 2012 and 2013. These ongoing actions include providing technical assistance to congress on any potential revisions to the Ethics in Government Act, assisting with the development of solutions to contractor ethics issues, and enhancing OGE's Executive Branch benchmarking

project by using information gleaned from that effort to foster improvements in ethics programs across all agencies. OGE also is expanding its efforts to engage the broader private sector, state and local, and international ethics community.

1. Ethics Legislative Reform

Ethics legislation remains a topic of great interest on Capitol Hill. OGE anticipates significant revisions to the Ethics in Government Act during this period. OGE will continue to provide technical assistance to Congress as well as try to ensure legislative revisions to the Executive Branch ethics program are implementable, efficient and strengthen the public's confidence in its government.

2. Ongoing Efforts to Address Contractor Ethics Issues

For years, OGE has been a leader in the effort to increase ethics oversight of government contractors. In fiscal years 2012 and 2013, OGE will continue to participate with organizations involved in shaping solutions, such as the Office of Federal Procurement Policy, the Federal Acquisition Regulatory Council, and the Administrative Conference of the United States. OGE will also share information with Inspectors General involved in contractor ethics issues. In addition, OGE will continue to work with agency ethics officials to promote the use of contract clauses to address personal conflicts of interest of personal services contractors.

3. Development of Program-Enhancing Tools Based on the Benchmarking of Cabinet-Level Ethics Programs

In fiscal years 2012 and 2013, OGE will expand its modernization efforts to ethics programs throughout the Executive Branch based on information gleaned from the comprehensive benchmarking of every cabinet-level ethics program. The cabinet-level ethics programs are the largest programs, reaching over 80 percent of all Executive Branch employees. The benchmarking project allows OGE to identify model practices, vulnerabilities, and needs of the Executive Branch ethics program at the broadest level.

Building on the results of this project, OGE will undertake several other projects to enhance the quality of all Executive Branch ethics programs. Planned projects include sharing model practices and developing training for ethics officials on management of ethics programs. OGE also will identify appropriate agencies for participation in a third round of benchmarking. In addition, OGE will develop a comprehensive oversight and compliance plan to ensure that OGE performs consistent monitoring of the ethics programs at both the agency and major component levels.

4. Expansion of Efforts to Engage the Larger Ethics Community: Good Governance Initiatives and International Assistance

In fiscal years 2012 and 2013, OGE will continue sharing good governance practices and learning experiences with other federal government entities, state and local government

entities, international organizations, foreign governments, and non-profit and business communities that have integrity programs similar to OGE's or that have conducted research into innovative and effective ethics and integrity programs.

Specific activities at the federal level will include OGE's continued collaboration with the Inspector General community through the Council of Inspectors General on Integrity and Efficiency (CIGIE), its Integrity Committee, and the IG Criminal Investigator Academy.

At the state and local government level, OGE will continue to actively share information and good practices with the Council of Government Ethics Laws (COGEL), an organization whose members are primarily state and local government agencies with ethics and other good governance responsibilities. OGE also expects to share and receive information on good ethics program practices, including innovative and effective training programs developed in the private sector. For example, OGE participates in the Ethics and Compliance Officer Association, a well-established 501(c)(3) organization.

Finally, at the request of United States' foreign policy agencies, OGE will continue to participate in programs designed to support and enhance United States foreign policy initiatives and assistance in the areas of anti-corruption and good governance. Through these interactions, OGE will also gain ideas for enhancing its own programs and policies. Programs will include those of the UN Office of Drugs and Crime and the implementation of the UN Convention Against Corruption, the Anti-Corruption and Transparency Working Group of APEC, the Public Governance Directorate of the Organization of Economic Cooperation and Development, the Organization of American States' MESICIC, and the Council of Europe's GRECO. In addition, OGE will provide technical experts to meet the United States' obligations under three mutual evaluation mechanisms: United Nations Convention Against Corruption (1st round), the Group of States Against Corruption (3rd and 4th rounds), and the Inter-American Convention Against Corruption's MESICIC (5th round). OGE also will continue to meet with numerous foreign delegations sponsored primarily by the Department of State's International Visitors Program, and will continue to represent the United States in various international forums focusing on corruption prevention and good governance.

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

OGE's third priority is to increase its use of technology to improve transparency and efficiency in the Executive Branch ethics program and to enhance training and oversight of agency ethics programs. OGE is in the midst of several major efforts aimed at achieving this goal. In fiscal year 2012, OGE will implement a replacement for its deteriorating Financial Disclosure Tracking System, and will develop an information management system to manage requests for advice from Executive Branch ethics officials. OGE also will increase transparency of nominee financial disclosure reports and related documents and improve its ethics training system with the acquisition and implementation of a learning management system. In addition, OGE will implement an electronic audit system to bring best practices and efficiencies to the review process and sharing departmental knowledge.

1. Replacement of OGE's Financial Disclosure Tracking System

In fiscal year 2012, OGE will fully implement its redesigned Financial Disclosure Tracking System. This internal web-based application contains information about the collection, review, and certification of public financial disclosure reports and other covered documents as required by the Ethics in Government Act of 1978. Having a new system in place is imperative with the substantial increase in nomination activity that occurs following a Presidential election, regardless of whether there is a new or continuing Administration.

2. Development of Agency Information Management System (AIMS)

In fiscal year 2012, OGE plans to develop and deploy AIMS, its client management system. The system will be designed and implemented to better track and manage incoming requests for guidance and interpretation from over 130 Executive Branch agencies and other organizations. Ideally, the system also will provide a management tool by allowing OGE to identify agency ethics programs that require significant OGE assistance and by revealing trends in issue areas of concern about which OGE should develop training and guidance. An enhancement to this System is the addition of agency profile pages, which OGE began developing in fiscal year 2011. The pages will serve as one-stop resources for use by OGE leadership, as well as rank and file staff, in responding to agency requests for guidance, developing training, preparing for meetings and other contacts with agency ethics officials and leadership, and otherwise staying abreast of emerging agency ethics program issues.

3. Increased Transparency for Nominee Financial Disclosure

In fiscal year 2012, OGE will greatly increase the transparency of its nominee program. OGE will accomplish this by implementing a system to allow the public to electronically request and obtain public financial disclosure reports and related documents of PAS nominees. Specifically, OGE will make these reports directly available to the public through its website.

4. Effectively Manage Ethics Learning Online

OGE will invest in a learning management portal on the Internet. This off-the-shelf technology will allow customers of this portal to save time and resources by managing all of their ethics learning online, including creating a comprehensive professional development plan; identifying, registering and taking courses, as well as participating in discussion forums.

5. Implementation of Electronic Audit System

OGE will begin using its new audit software to standardize, automate, and manage significant aspects of the review process. Instead of using a manual, paper-intensive process, the review team will document work papers and prepare reports through a single, secured system that adheres to management-approved steps and professional practices. OGE plans to implement the audit system in fiscal year 2012 with the goal of bringing best practices and efficiencies to the review process and sharing departmental knowledge.

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

As the entire federal government faces a wave of retirements,³ OGE will promote continuity and succession planning within the agency and across the Executive Branch ethics program through four specific leadership initiatives. First, through its public financial disclosure program, OGE will continue to underscore the importance and scope of the Executive Branch ethics program to a very substantial number of the most senior government employees. Second, OGE will develop curriculum leading to an ethics official certification program. This is an outgrowth of the successful two-day new ethics official certificate program launched in fiscal year 2010. Finally, as a component of OGE's succession planning, OGE will fully implement its new honors attorney program to create a pathway for new attorneys to enter the federal government and the ethics community.

1. 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 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.

³ OPM has projected that 36% of Executive Branch employees were eligible to retire in 2010, and 61% will be eligible by 2016. OGE has confirmed through its surveys of ethics officials that the Executive Branch ethics program is not immune from this workforce turnover, and it is to be expected that ethics officials will be among those who leave the federal workforce.

In fiscal years 2012 and 2013, OGE will continue to review public financial disclosure reports affecting government succession at the highest levels of Executive Branch leadership. Specifically, OGE personnel will be reviewing a significant volume of financial disclosure reports of PAS nominees in order to ensure continuity in government leadership.

Due to the ongoing appointment of officials to vacant positions and routine turnover of senior leaders, OGE personnel typically review and certify more than 250 public financial disclosure reports of PAS nominees in each of the two years before a Presidential election. OGE's review and certification of these PAS nominee reports is in addition to its review and certification of 1,100 annual and termination financial disclosure reports of PAS appointees.

2. Development of a New Certification Program for Ethics Officials

Because of the decentralized nature of the Executive Branch ethics community, ethics officials rely almost exclusively on OGE for essential training and continuing education to remain current and enhance their knowledge base. In fiscal years 2012 and 2013, OGE will provide a comprehensive curriculum to prepare ethics officials for certification. The curriculum will include a number of classroom and online courses to prepare ethics officials to perform successfully in their jobs. In 2013, OGE will provide continuing education courses to agency ethics officials in order to maintain their expertise once certification is achieved. OGE will partner with ethics experts within the Executive Branch and the private sector to deliver continuing education that is innovative and of the highest quality.

3. Full Implementation of an OGE Honors Attorney Program

In fiscal year 2012 and within existing personnel authorizations and payroll, OGE expanded the honors attorney program it developed for recent law school graduates in fiscal year 2011, from one attorney to three attorneys. OGE has created this new pathway for entry level attorneys to enter the federal government and the ethics community. As a component of OGE's succession planning, the program will foster greater understanding of the OGE mission and strengthen the government's commitment to preventing conflicts of interest as these attorneys move into other federal agencies as ethics counselors. Through training and exposure to the criminal conflicts of interest laws and the standards of conduct at OGE, the agency is preparing tomorrow's leaders in the ethics community.

Section V – Improve Employee Satisfaction and Wellness

A. Serve as a Model Employer for Executive Branch Agencies

Consistent with the President's priority of responsibly governing the Nation and the President's expectation that the government will be a model employer, in fiscal years 2012 and 2013 OGE will continue to both gain efficiencies in the workplace and to increase employee satisfaction and well-being. OGE's Administrative and Technology teams will work to create a supportive work environment in which employees will be able to fulfill their government responsibilities. OGE will continue to prioritize its employees' professional

development through training and experiential learning. OGE's management will continue to provide a safe and hospitable work environment. OGE employees reported in the 2011 Employee Viewpoint Survey a significantly higher percentage of positive responses than Government-wide responses regarding leadership, a results oriented performance culture, talent management, and job satisfaction and improvement over the prior year's results in all of these areas.

1. Make Administrative Improvements

In fiscal years 2012 and 2013, OGE will continue to improve administrative support services and realize operational efficiencies. In fiscal year 2010, OGE began expanding services provided by the Bureau of Public Debt's (BPD) shared service center for some of its human resources, procurement, and fiscal services, and significantly increased the number and range of services provided by BPD in fiscal year 2011. Included in the services that OGE procures from BPD are personnel processing, time and attendance, full service budget and financial management, full service for procurements over the micro-purchase threshold, travel services, and government purchase card management. In fiscal year 2011, OGE also implemented an electronic Official Personnel Folder and an automated time and attendance system. These services were procured from BPD to achieve operational efficiencies and improve administrative support; however, OGE anticipates that the procurement may also result in other benefits. The Office of Personnel Management's (OPM) most recent cost benefit analysis of its Human Resources Line of Business program found a potential for cost savings, improved management and improved customer service for agencies that use shared service centers for their non-mission critical, administrative support functions.⁴

OGE administrative efforts, expected to continue in fiscal year 2012 include continued evaluation and improvement of its continuity and succession planning to provide a stable work environment for employees. OGE plans to continue to explore electronic information technology solutions for personnel data security. OGE will participate in the national level Federal Continuity of Operations exercise in 2012. Also in fiscal year 2012, OGE will submit to OPM the necessary documents to re-certify OGE's Senior Executive Service performance system.

2. Promote a Performance Culture

OGE will continue its strong efforts to create a performance culture. According to OGE's 2011 Employee Viewpoint Survey, these efforts are paying off with 74 percent of responding employees reporting favorably on OGE's results oriented performance culture – a full 20 percent higher than the Government-wide results. OGE's employee survey results also found that 77 percent of OGE's employees positively regarded the agency's talent management – 17 percent higher than the Government-wide results.

⁴ See the Office of Personnel Management's latest cost-benefit analysis for the Human Resources Line of Business program, which found a potential for cost savings for agencies that moved their administrative support services to shared service centers: <http://www.opm.gov/egov/documents/CBA/CBARReport-12-31-09.pdf>.

In addition to providing robust information technology and administrative support, OGE management will continue to support employees' professional development. OGE encourages employee details, both within OGE program offices and to other government entities, for the purpose of increasing the knowledge and skills of the employees who fulfill OGE's mission. OGE employees benefit from a combination of formal course work and experiential assignments, including working with the Congress, the White House, and other Executive Branch agencies. OGE also invites guest speakers to discuss issues of relevance to agency programs. Similarly, OGE hosts employee developed bi-weekly issue forums to keep its employees abreast of developments in ethics law and the resolution of emerging issues.

OGE's 2011 Employee Viewpoint Survey identified two areas where OGE leaders have focused additional efforts. OGE employees' responses regarding their perception that they are prepared for potential security threats was below the Government-wide result. In FY 2012, OGE will be updating its Continuity of Operations Plan and participating in the Department of Homeland Security/Federal Emergency Management Agency's National Level Exercise on emergency preparedness. Additionally, OGE employees' responses were below the Government-wide results regarding managers' communication of OGE's goals and priorities. In 2012, OGE's Acting Director established a more regular schedule of meetings with his executive staff and the mid level managers and is holding all supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

To enhance quality of life standards for employees, OGE supports flexible work schedules and encourages a team environment. OGE's flexible work options and benefits include part-time employment, compressed work schedules, telework, staggered start-time options, and accommodations for nursing mothers. OGE's employee survey found a 25 percent increase in positive responses over that of 2010, regarding employee satisfaction with its telework program. OGE creates a team environment by recognizing employee service at an annual awards ceremony, encouraging employees to participate in volunteer and sporting programs after hours, engaging in Combined Federal Campaign activities, and supporting its employees in their efforts to organize a lunchtime book club and an off-duty movie club. OGE employees also are encouraged to actively support the Feds Feed Families drive and charitable holiday activities.

B. Offer 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. An FOH nurse 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 occasionally. FOH also hosts periodic brown bag lunches to discuss topics such as healthy diets, sunscreen use, and the importance of regular health screenings. In addition, OGE provides a dedicated refrigerator and other

accommodations for nursing mothers. 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, 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 personal funds for a commercial bottled water service.

OGE employees also expressed a high degree of job satisfaction in the 2011 Employee Viewpoint Survey. In addition to increasing the percent of positive responses in the area of job satisfaction from 75 percent in 2010 to 78 percent in 2011, OGE also significantly exceeded the 2011 Government-wide average of 68 percent.

Section VI – Conclusion

OGE will use its fiscal year 2013 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. With reductions in support and other expenses, the budget request provides the minimum amount OGE will need to carry out its statutorily required mission, as well as to conduct activities designed to enhance OGE's oversight of Executive Branch ethics.