

OGE Agency Profile



2024



**U.S. Office of
Government
Ethics**

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01

The Office of
Government
Ethics & the
Executive Branch
Ethics Program

About OGE Introduction

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.

Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 140 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

Maintaining the trust of the citizens OGE serves is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.



The head of each executive branch agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.

Each agency’s employees, including supervisors, human capital officials, and the agency’s Inspector General, play a significant role in maintaining the integrity of government programs and operations.

Further, OGE and ethics officials across the government are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigations of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.



To carry out its vital leadership and oversight responsibilities for the executive branch ethics program, OGE:

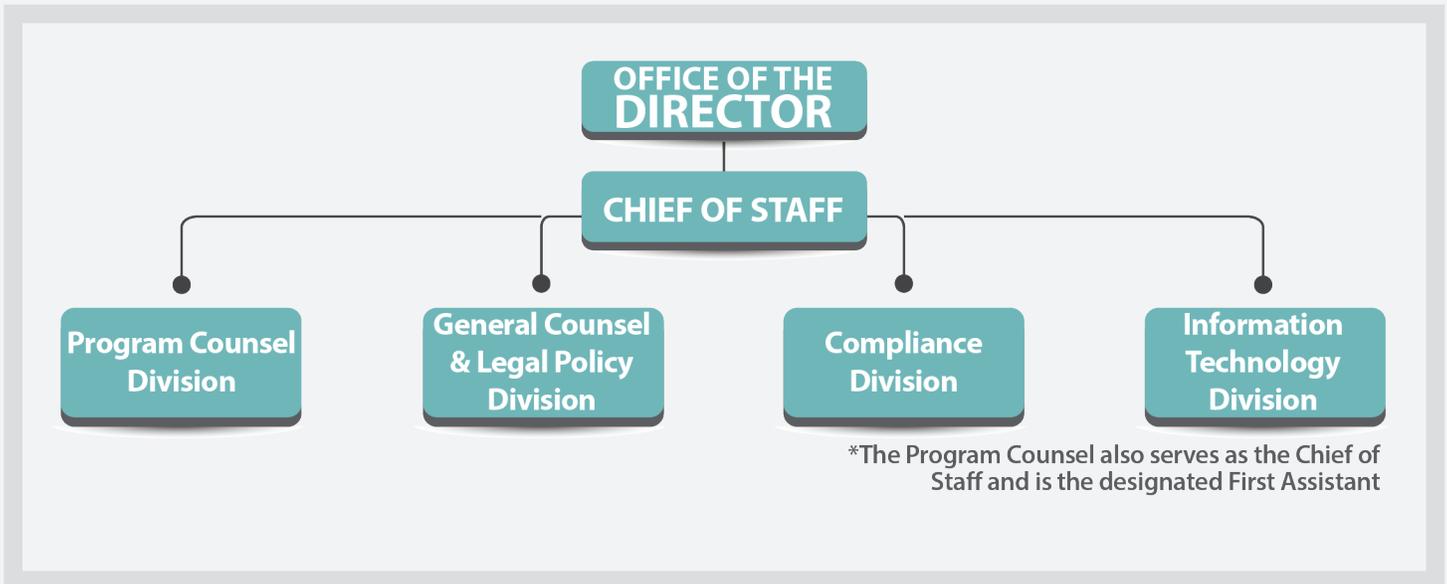
- plays a unique role in the Presidential appointments process and in the preparation for Presidential transitions;
- operates and maintains [INTEGRITY](#), an electronic public financial disclosure management application used by nearly all of the 26,000 public executive branch filers, including all of the highest-level executive branch officials;
- oversees a financial disclosure system that reaches more than 26,000 public and nearly 390,000 confidential financial disclosure report filers;
- Offers support and [education and training](#) to the more than 5,000 ethics officials executive branchwide;
- promulgates, maintains, and advises on enforceable standards of ethical conduct for more than 2.7 million employees in over 140 executive branch agencies, including the White House;
- monitors executive branch agency ethics programs and senior leaders' compliance with applicable ethics laws and regulations;
- fosters ethical leadership in senior officials;
- conducts outreach to the general public, the private sector, and non-governmental organizations; and
- increases transparency by making thousands of ethics documents [publicly available](#).



The absence of a strong, consistent executive branch ethics program with clear rules, guidance, support, training, and financial disclosure could lead to ethical lapses, improper use of taxpayer funds, and a loss of public confidence in government.

OGE Leadership & Structure

For additional information about OGE's current career leadership team, supervisory team, and workforce, please see the appendix beginning on [page 28](#).



Office of the Director

The Office of the Director provides overall direction to the executive branch ethics program and is responsible for ensuring that OGE fulfills its congressional and Presidential mandates. The Director is appointed to a five-year term by the President and is confirmed by the Senate. The Director is a member of the Council of Inspectors General for Integrity and Efficiency (CIGIE) and the Integrity Committee of CIGIE, which reviews allegations of misconduct against inspectors general. The Director serves as a member of the Administrative Conference of the United States.

Chief of Staff

The Chief of Staff is a career civil servant and is the designated First Assistant. The Chief of Staff directs OGE's overall operations and finances, leads the agency's strategic planning and performance management, and supervises OGE's executives and managers. OGE's Chief of Staff also serves as the Program Counsel whose responsibilities include: strategic planning; monitoring ethics program performance; supporting agency ethics offices through OGE's Desk Officer program; overseeing the training of thousands of ethics officials; ensuring OGE's legal compliance; developing and implementing OGE's external communication strategy; managing OGE's congressional affairs; and spearheading strategic initiatives, including the development and maintenance of *INTEGRITY*, OGE's executive branchwide electronic filing system for public financial disclosures.

Program Counsel Division

Legal, External Affairs and Performance Branch

The Legal, External Affairs and Performance Branch (LEAP) is responsible for (1) providing agency specific legal support to OGE; (2) managing OGE's budget and legislative affairs programs; (3) coordinating and conducting outreach between OGE and its many stakeholders, such as Congress, the Office of Management and Budget (OMB), government watchdog groups, and the public; (4) overseeing OGE's Freedom of Information Act, Privacy Act, and Records Management programs; (5) serving as OGE's liaison to the Federal Register and the Office of Information and Regulatory Affairs within the OMB; and (6) participating actively in U.S. government anti-corruption efforts.

LEAP is also responsible for operating *INTEGRITY*, the executive branch e-filing system for 90% of public financial disclosure filers.

Agency Assistance Branch

The Agency Assistance Branch (AAB), through its Desk Officer Program, is responsible for (1) assisting agency ethics officials in evaluating complex issues, providing information about how other agencies are implementing ethics requirements, and giving guidance on OGE's policies regarding program activities; (2) developing ethics program leaders and providing professional development opportunities to agency ethics officials at all levels through its Institute for Ethics in Government; (3) creating opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies; and (4) administering the Annual Agency Ethics Program Questionnaire.

Key Staff

- Chief of Staff and Program Counsel
- Chief, Legal, External Affairs and Performance Branch
- Chief, Agency Assistance Branch

General Counsel & Legal Policy Division

Ethics Law and Policy Branch

The Ethics Law and Policy Branch (ELPB) is responsible for (1) developing, drafting, and issuing executive branch ethics regulations; (2) setting forth executive branchwide ethics policies and issuing interpretive guidance thru advisories; (3) consulting on conflict of interest waivers; (4) issuing certificates of divestiture; (5) reviewing supplemental ethics regulations; and (6) supporting the vital work of the ethics enforcement communities through training and technical assistance.

Presidential Nominations Branch

The Presidential Nominations Branch (PNB) is responsible for (1) providing assistance to the President and Senate in the Presidential appointments process; (2) maintaining uniform financial disclosure forms; and (3) providing guidance/resources on the public and confidential financial disclosure programs.

Incumbent Financial Disclosure Branch

The Incumbent Financial Disclosure Branch (IFDB) is responsible for (1) conducting expert second-level reviews of senior agency leaders' periodic and annual financial disclosure reports and (2) responding to requests for an individual's ethics documents.

Key Staff

- General Counsel
- Chief, Ethics Law and Policy Branch
- Chief, Presidential Nominations Branch
- Chief, Incumbent Financial Disclosure Branch

Compliance Division

Program Review Division

The Program Review Branch (PRB) is responsible for (1) monitoring and reviewing agency ethics programs to ensure compliance with applicable ethics requirements established by statutes, rules, regulations, and Executive Orders; (2) issuing recommendations and conducting follow-up reviews; (3) collecting information on potential ethics violations by executive branch employees (Form 202); (4) tracking documentation of senior agency leaders' compliance with their individual ethics commitments, (5) making inquiries to agencies when its employees appeared to OGE to be out of compliance with ethics requirements; (6) reviewing agency requests for alternative financial disclosure procedures; and (7) exempting Schedule C employees from public financial disclosure requirements, as warranted.

Administrative Operations Branch

The Administrative Operations Branch (AOB) is responsible for (1) ensuring OGE is compliant with administrative requirements; (2) purchasing and contracting; and (3) property management and other administrative programs, and (4) overseeing human resources functions. OGE is supported by a Human Resources Officer and specialists in the Department of Treasury's Bureau of Fiscal Service and other agencies that perform services through interagency shared services agreements.

Key Staff

- Deputy Director for Compliance
- Chief, Program Review Branch

Information Technology Division

The Information Technology Division (ITD) is responsible for (1) maintaining OGE's information technology systems, equipment, and security; (2) creating and operating network applications; and (3) maintaining OGE's website.

Key Staff

- Chief Information Officer

OGE's Major Functional Areas

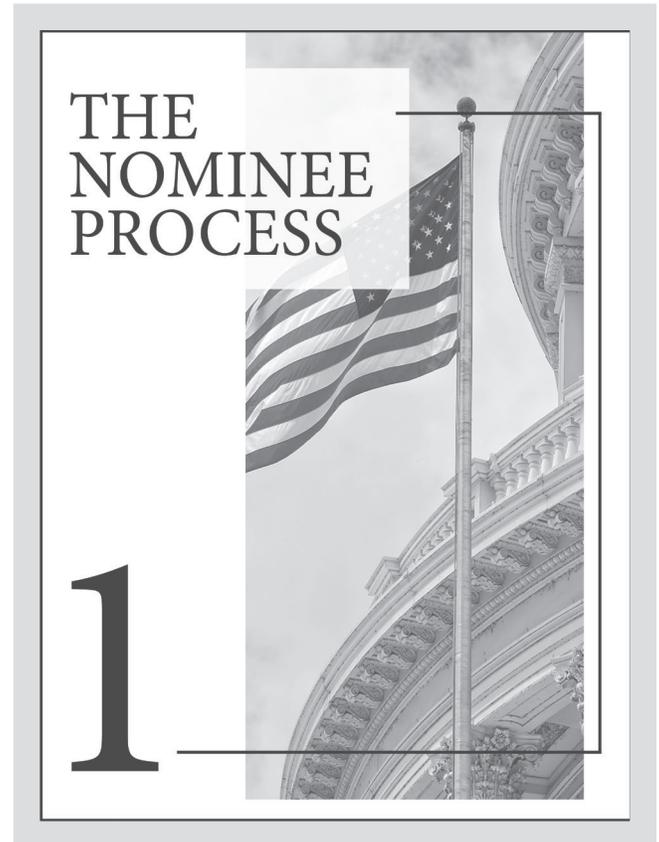
The work performed by OGE's staff of approximately 75 employees covers a wide range of activities for such a small agency. Broadly speaking, most of OGE's work to achieve consistency, accountability, continuity, and engagement in the ethics program can be grouped into nine major areas.

Presidential Nominations & Support for Presidential Transitions

OGE provides an independent review of the financial disclosure reports of candidates for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed nominees and candidates for the Offices of the President and Vice President of the United States. OGE makes sure that these individuals have complied with the extensive requirements for financial disclosure under the Ethics in Government Act. These requirements are highly complex, and ensuring full compliance is necessarily labor-intensive. OGE's goal regarding a nominee's disclosures is to ensure that the Senate receives a thorough accounting of relevant financial interests in order to facilitate its advice-and-consent role in considering the President's nominees. The goal with respect to a Presidential candidate is to provide the electorate with similar information. OGE does not recruit, conduct background investigations, or politically vet nominees.

OGE's review of nominees' disclosures presents a critical opportunity to evaluate their financial interests for potential conflicts of interest and introduces top leaders to the importance of ethical leadership. OGE approaches this function from the perspective of [managing risk](#). To that end, OGE requires nominees to reduce the potential for

ethical issues to arise in the first place, and OGE prescribes mechanisms for addressing conflicts of interest if issues do arise. Conflicts of interest occur at the intersection of a nominee's financial and certain other personal interests and their job duties. Therefore, to evaluate the potential risks of a nominee's conflicts of interest, OGE consults with the agency ethics officials where the nominee would serve, who are very knowledgeable about the nominee's potential job duties and their agency's programs and activities. Based on these consultations, OGE and agency ethics officials prepare an ethics agreement that describes the specific steps a nominee will take to avoid conflicts of interest. After confirming with the agency that there are no unresolved conflicts of interest, OGE then transmits the certified financial disclosure report, the ethics agreement, and a cover letter directly to the Senate. After a nominee is confirmed and takes office, OGE works to ensure they remain free of conflicts of interest by collecting a Certification of Ethics Agreement Compliance from each appointee. This Certification requires each appointee to personally attest that they have complied with the terms of their ethics agreement. In support of transparency and accountability, OGE posts these certifications, as well as notices of late compliance and extensions, on its [website](#).



The nominee function is never more important than during the transition between Presidential administrations. A Presidential transition is a critical time when the nation is vulnerable, with the potential for manmade, natural, or economic disasters to strike while the government's top leadership positions are vacant. OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly.

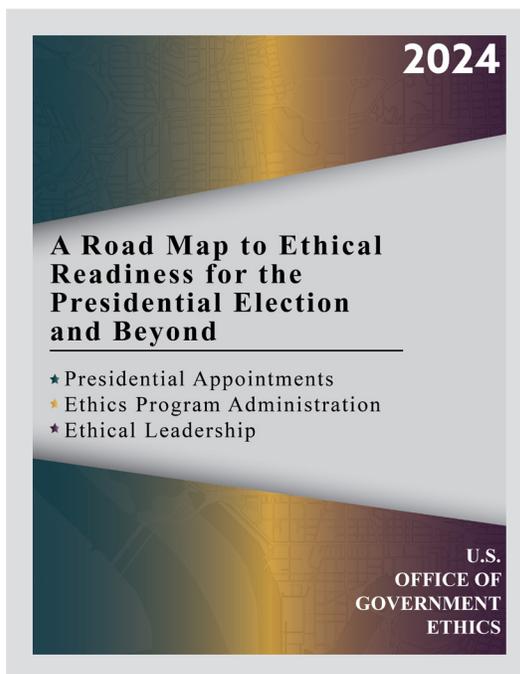
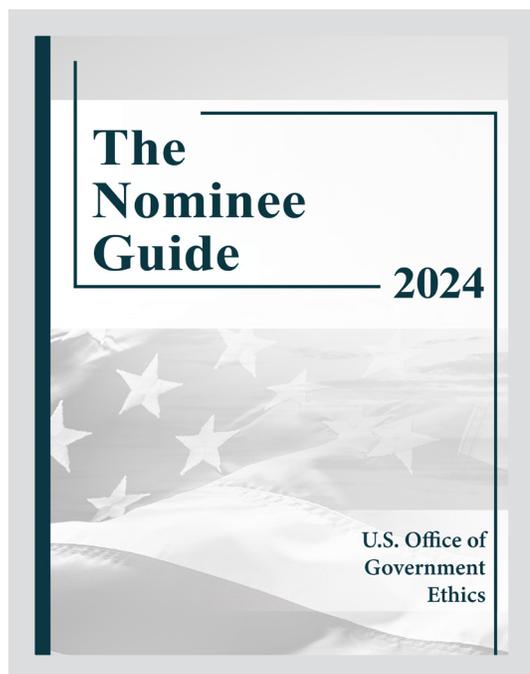
During Presidential transitions, nominations going through OGE typically double in volume and increase in complexity. When a President is reelected, the increased volume of work is challenging, due to the turnover of appointees between the first and second terms. When a new President is elected, however, the challenge is even greater, and delivering on the promise of a smooth transition demands a full commitment of OGE's resources.

To manage this challenge, OGE must prepare for the possibility of a full transition every four years. Starting two years before a transition, OGE begins training additional staff members to review nominee packages. One year before the inauguration, OGE steps up both its internal training and the training it provides to agency ethics officials. This training focuses not only on reviewing nominees, but also on counseling outgoing officials on legal restrictions applicable to them when they are seeking post-government employment and after they leave government service. For example, prior to the most recent Presidential election, OGE held a year-long National Government Ethics Summit for thousands of participants that focused on preparation for the Presidential transition.

OGE took a number of other measures to prepare prior to the most recent election, streamlining OGE's nominee processes, and updating and publishing [critical guidance documents](#) for prospective nominees and ethics officials, including [the Nominee Guide](#), the [Guide to Drafting Ethics Agreements](#), [the Public Financial Disclosure Guide](#), and the Confidential Financial Disclosure Guide. Prior to the election, OGE published numerous election readiness [legal and program advisories](#) for executive branch ethics officials.



OGE actively participated as a statutory member of the executive branchwide Agency Transition Directors Council and in collaboration with the Partnership for Public Service's Center for Presidential Transition. In addition, in coordination with the Office of Management and Budget (OMB), General Services Administration (GSA), Office of Personnel and Management (OPM), Department of Justice (DOJ), and the National Archives and Records Administration (NARA), OGE provided expertise and content for the Presidential Transition Directory and six and three month reports to Congress on election readiness. OGE presented to external stakeholders, congressional staff, and other interested parties about its preparations.



Finally, OGE works with representatives of Presidential candidates in connection with their financial disclosure reports and their early transition efforts. OGE also publishes guidance for candidates and transitions teams such as: [Ethical Readiness for the Presidential Election and Beyond](#); [Ways OGE Can Help in the Presidential Transition](#); [a Quick Guide to PAS Reports](#)

[OGE Reviews](#); and [an Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review](#). These resources advise transition teams on the government ethics aspects of the Presidential transition, including ethics clearance during the nominations process. On a number of occasions, OGE also meets with representatives of the campaigns regarding their transition efforts prior to the election.

In the year after a Presidential election, OGE necessarily draws down on other activities in order to commit resources to managing the volume of transition-related work. By cross-training staff and assigning nominee work across divisions and branches, OGE has developed surge capacity to manage the significantly increased nominee workload experienced during Presidential transitions. The increased volume typically lasts up to 18 months after an election when a new President is elected.

Electronic Public Financial Disclosure Filing

OGE successfully operates [INTEGRITY](#), a secure, web-based electronic filing system that has been widely adopted and effectively used by nearly all public financial disclosure filers in the executive branch. *INTEGRITY* has changed the way that financial disclosure reviews for 26,000 high-level officials are conducted by agency ethics officials and has become an integral part of the public financial disclosure program in the executive branch.

With over 45,000 users across the executive branch and with an agency user satisfaction rating of 96%, *INTEGRITY* replaced an inefficient patchwork of paper forms, scanned and emailed pdf documents, and rudimentary online systems that required filers and reviewers to begin the financial disclosure process from scratch each year. Its question wizard, designed by financial disclosure experts, helps senior government officials file faster, and file more complete and accurate disclosures.

Well-designed workflows also help thousands of agency reviewers to process reports more quickly and with greater accuracy. The improved reporting format makes disclosures easier for Senators considering a Presidential nomination and for members of the public to understand. All of this means that more complete, accurate, and easier-to-read disclosures are available to the public sooner. To ensure *INTEGRITY* remains effective, OGE has continued to convene its *INTEGRITY* Advisory Council to seek ongoing input from user agency representatives.



INTEGRITY helps thousands of senior government officials to remotely and electronically file clearer and more uniform financial disclosure reports with greater efficiency. These reports are made available to the public so that they can ensure their government's leaders are free from conflicts of interest.

Direct Assistance to Stakeholders

OGE provides direct assistance to stakeholders in the executive branch ethics community. The primary recipients of this support are agency ethics officials, who are responsible for providing ethics services to the 2.7 million civilian employees at the more than 140 executive branch agencies. OGE's Desk Officers assist agency ethics officials in evaluating complex issues, provide information about how other agencies are implementing ethics requirements, and give guidance on OGE's policies regarding program activities. Desk Officers are able to assist agencies in implementing recommendations made in OGE's program reviews. On average, OGE Desk Officers collectively respond to more than 1,000 calls for assistance per year. OGE uses information collected through Desk Officer interactions to make data-driven decisions on how best to serve agency ethics programs and to identify agencies in need of special outreach or training.

OGE also actively supports the investigative and enforcement communities. For example, OGE's Director serves as a statutory member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE). OGE provides training and responds to requests from Inspectors General for assistance in interpreting the complex ethics laws and regulations in connection with their investigations. OGE has provided similar assistance and training to the Department of Justice, related to both prosecutions and civil penalty enforcement.



In addition to its website ([OGE.gov](https://www.oge.gov)) and outreach on social media (LinkedIn: [Office-of-Government-Ethics](https://www.linkedin.com/company/office-of-government-ethics)) and (X: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)), OGE has undertaken other significant efforts to improve stakeholder awareness and communications. For example, OGE holds quarterly meetings for the leaders of agency ethics programs throughout the government. OGE regularly provides technical assistance to congressional committees and members of Congress in connection with legislation related to ethics issues. Similarly, OGE regularly provides the State Department with substantial support for U.S. participation in international anti-corruption organizations.

Ethics Education

To promote consistent implementation of agency ethics programs, OGE provides intensive training for new agency ethics leaders as well as comprehensive [education resources](#) for ethics officials at all experience levels, including seasonal, on-demand training before critical deadlines, through its Institute for Ethics in Government.

OGE has developed and offered numerous new and ongoing professional development opportunities for ethics officials, including: (1) Orientations for ethics program leaders; (2) the Accelerated Certification in Ethics (ACE) for emerging ethics leaders; (3) Skill Builders for skills development in key aspects of the ethics program; (4) the Annual Professional Ethics Practitioner (PEP) Certificate for practicing ethics officials to stay up-to-date on program developments; and (5) interactive trainings on a variety of topics.

For new and aspiring ethics officials, OGE has developed the multi-month, intensive Accelerated Certification in Ethics (ACE), which provides a comprehensive introduction to all aspects of the ethics program, including program administration and leadership, advice and counsel, financial disclosure, and education and communication. The program requires a formal application and a recommendation from the individual's supervisor.



For ethics officials and others who support the ethics program in a targeted way, OGE has developed Skill Builders on key ethics topics such as confidential financial disclosure, gifts, and advice and counsel.



For ethics officials who are performing some or all functions of an ethics program at full competency and who wish to maintain their skills, OGE has developed the annual Professional Ethics Practitioner (PEP) Certificate, which requires ongoing professional development through a variety of offerings. OGE also offers interactive training throughout each year on a wide range of ethics topics.

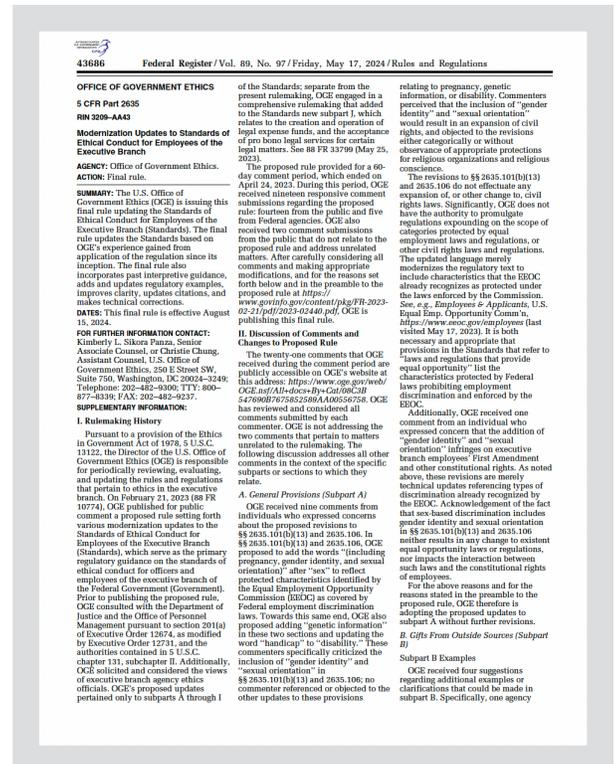
OGE also supports the development of ethics officials through its [Institute for Ethics in Government Education Library](#). OGE's virtual library includes more than 100 education resources designed for use by ethics officials, including recordings of training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity.

Regulations & Interpretive Guidance

OGE ensures consistency across the executive branch ethics program through regulations and interpretive guidance. OGE issues and interprets regulations that are applicable to all executive branch agencies and employees, such as [the Standards of Ethical Conduct for Employees of the Executive Branch](#) and regulations implementing the conflict of interest laws, among others. OGE regularly updates and modernizes its regulations, including to address emerging ethics issues, and actively solicits stakeholder feedback. For example, OGE recently published a final rule to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards). OGE also recently established a program implementing the new legal expense fund regulation for employees who accept gifts of legal expenses arising from their official duties.

OGE oversees the establishment and modification of [supplemental ethics regulations](#) for individual agencies in order to address agency-specific ethics issues. OGE routinely updates provisions regarding civil monetary penalties (5 C.F.R. parts 2634 and 2636), separate component designations for purposes of post-employment restrictions (5 C.F.R. part 2641), and exemptions to the primary criminal conflicts of interest statute (5 C.F.R. part 2640).

OGE issues legal and program advisories and list them in OGE's Legal Research Collection on OGE's website which can be searched, filtered, and sorted. OGE uses an evidence-based approach to determine topics, as well as to seek feedback from agency ethics officials prior to issuance, to ensure the usefulness and clarity of the guidance. In addition, OGE works with agencies to develop or distribute materials addressed directly to government employees who are covered by the ethics rules. Feedback on OGE's work has been highly favorable. Annual executive branchwide surveys revealed that more than 90% of agency ethics officials believe that OGE's publication of guidance materials helps them to perform their jobs effectively.



Oversight of Agency Ethics Program Compliance

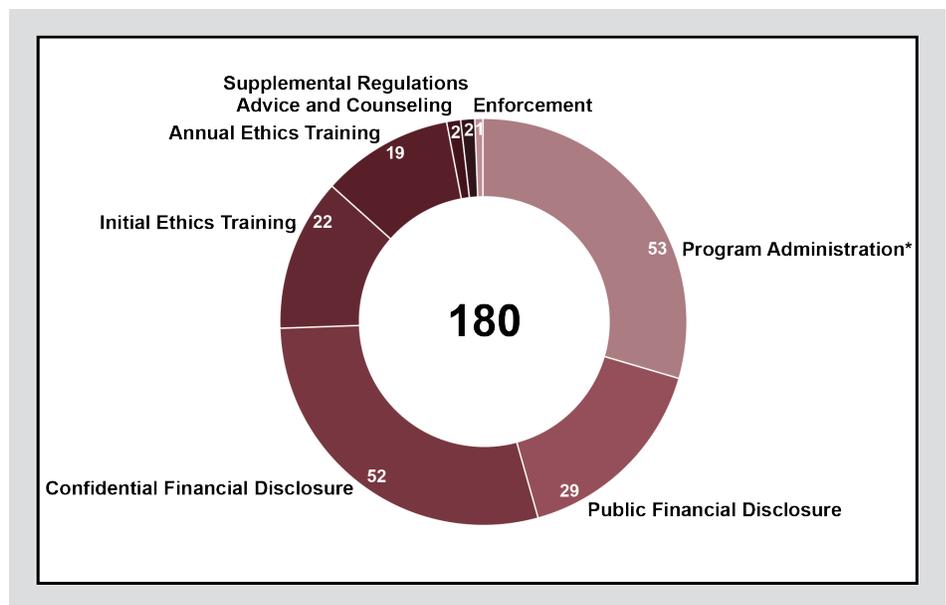
OGE monitors agency compliance in order to mitigate ethics program vulnerabilities at each of the more than 140 executive branch agencies and to identify executive branchwide trends. OGE conducts agency ethics program reviews to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch. OGE has implemented a risk-based approach to conducting these reviews, using data and stakeholder feedback to assist in identifying agencies and specific issues to review which has resulted in a review cycle that reaches every agency either every three or every four years.

OGE reviews agency programs to identify and report on the strengths and weaknesses of programs by evaluating both (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies; and (2) ethics-related systems, processes, and procedures for administering the program. Cabinet agencies and other agencies determined by OGE to be at higher risk are reviewed every three years. Other agencies are reviewed at least once every four years. If needed, OGE conducts real-time consultations and other compliance-based interventions through inquiries into ethics risks. OGE also requests ethics program data from agencies to address issues that require oversight.

OGE examines all elements of an agency ethics program, including program administration, financial disclosure, education and training, ethics counseling, agency-specific ethics rules on outside employment, conflict remedies, enforcement, and special government employees. OGE conducts appropriate follow-up reviews to evaluate agencies' progress in implementing any recommendations made in OGE's program review reports.

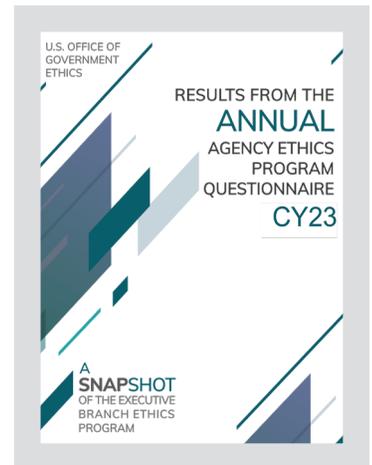
To enhance transparency and accountability, OGE publishes all program reviews and follow-up program reviews on its [website](#), as well as [quarterly dashboards](#) with recommendations.

Although OGE's primary mission is prevention, when OGE is made aware that an employee appears to be out of compliance with ethics requirements, OGE may take one or more of the following steps: make inquiries to the employee's agency ethics officials; determine whether the agency is taking sufficient remedial actions; recommend that the agency investigate or take corrective or disciplinary action; and determine whether further investigation is required. If further investigation is required, OGE may recommend that the agency refer the matter to the agency's Inspector General. After an investigation by the agency and/or an Inspector General, OGE will consider whether any further action is required. If OGE determines that



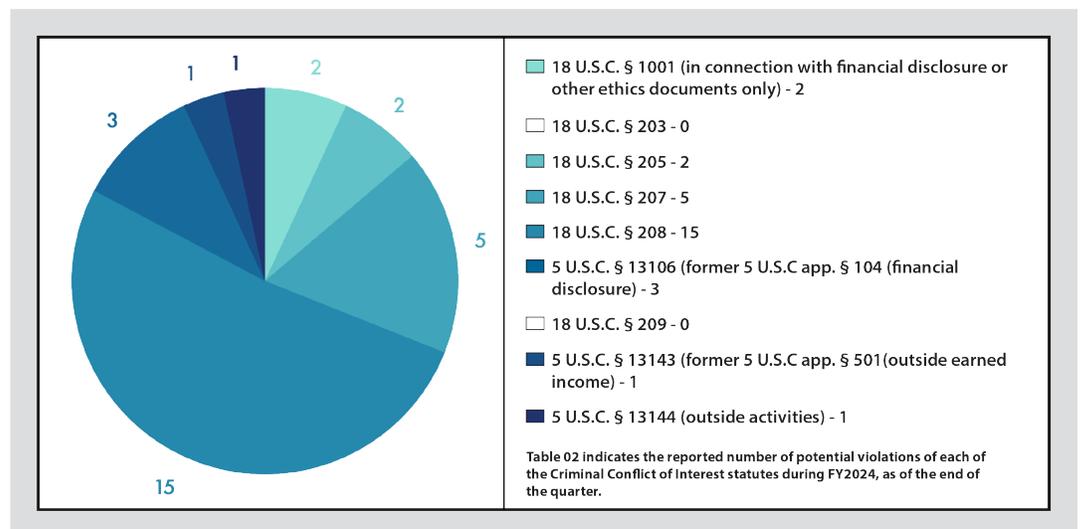
noncompliance was the result of a systemic problem with the management of the agency ethics program, OGE may evaluate the program through an unscheduled program review. In rare cases, OGE may directly refer a case to the Inspector General for investigation when OGE is in the best position to know the facts, such as when directly involved in reviewing a nominee’s or employee’s public financial disclosure report. OGE can also use its authority to decline to certify a public financial disclosure report that comes to OGE for review. While OGE can make referrals and decline to certify reports, OGE is statutorily prohibited from making determinations that a past action constitutes a violation of a criminal ethics law.

In addition, each year, OGE conducts annual oversight of every agency through its [Annual Agency Ethics Program Questionnaire](#). Agencies are statutorily required to submit information annually to OGE, and OGE rigorously reviews agency responses and analyzes trend data to identify areas of concern at individual agencies and across the executive branch. In addition to publishing a report with the aggregate data, OGE posts individual agency responses on its website to increase transparency and oversight. OGE uses the data to provide training on the results, encouraging agencies to use the questionnaire as a tool both to self-assess and to benchmark their agency against similarly situated agencies.



OGE serves as the repository for biannual reports (1353 Travel Reports) that document payments of travel accepted from non-federal sources. Although OGE has no role in providing guidance on the travel regulations, OGE makes these reports available on its website, as required by statute.

Additionally, OGE collects information on potential ethics violations by executive branch employees. Agencies are required to concurrently notify OGE’s Director when referring any matter to the Department of Justice involving a potential violation of a criminal conflict of interest law by an employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action in the event prosecution is declined. OGE annually publishes a survey of ethics-related prosecutions and publishes data regarding these referrals on its website.



Oversight of Senior Leaders Compliance

OGE works to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office by monitoring compliance with the commitments in their ethics agreements. OGE requires a personal attestation of compliance with the terms of their ethics agreement from each appointee through a Certification of Ethics Agreement Compliance. In support of transparency and accountability, OGE posts these certifications, as well as notices of late compliance and extensions, on its website. In the event that a PAS official is more than 30 days late in submitting their Certification or submits a certification that indicates a substantive deficiency in complying with the terms of their ethics agreement, OGE, as appropriate, notifies the Senate committee of jurisdiction.

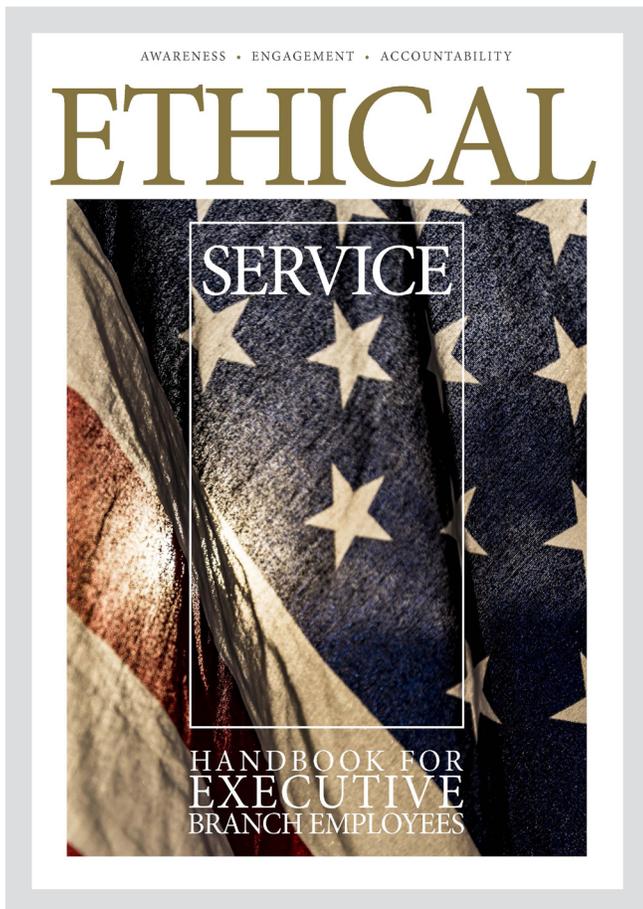
OGE provides expert, second-level review of periodic and annual financial disclosure reports of appointees at the highest-level executive branch positions. OGE collects and reviews the annual, termination, and periodic transaction reports of PAS filers to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements. OGE provides each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act, including the requirement to timely submit reports to OGE and to promptly provide any additional information necessary for OGE to certify the reports.

OGE also reviews requests for Certificates of Divestiture (CD) which may be requested if an executive branch agency or OGE has directed an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order and selling the asset will result in a capital gain. A CD allows an eligible person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. OGE makes the CDs it issues available electronically through OGE's online submission form to request an individual's ethics documents (OGE Form 201).

Finally, OGE also consults with agencies prior to the issuance of waivers of the primary criminal conflict of interest law (18 U.S.C. § 208), collects copies of final waivers, and lists information about individuals granted certain conflict of interest waivers on its website. 18 U.S.C. § 208 prohibits employees from participating in certain government matters affecting their own financial interests or the interests of certain persons with whom they have ties outside the government. In some cases, a waiver to these restrictions may be appropriate if the financial interest is "not so substantial as to be deemed likely to affect the integrity of the services which the government may expect from such officer or employee."

Engaging Senior Leaders

Ethical culture begins with demonstrated ethical leadership throughout an organization. To advance a consistently strong program, OGE seeks opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues.



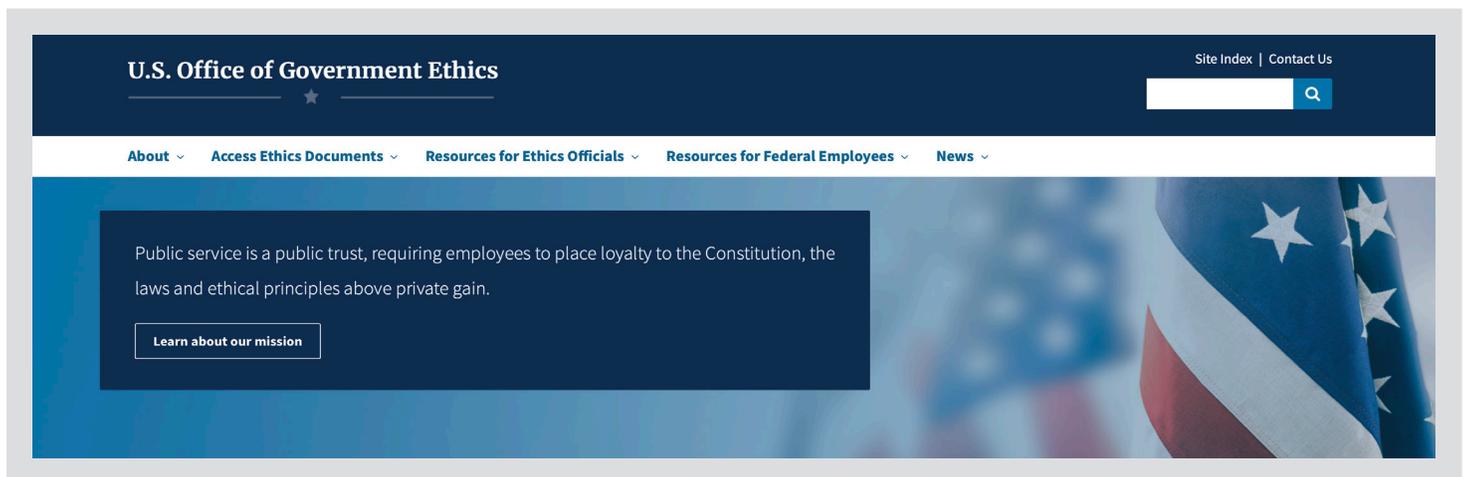
OGE engages with senior leadership both directly and indirectly through external communications, involvement in nominee financial disclosure reports and ethics agreements, as well as through publications and educational offerings. For example, to support ethics officials in new leadership positions, OGE sends a welcome letter to each new Designated Agency Ethics Official and Alternate Designated Agency Ethics Official with critical details about their important roles, responsibilities, and professional development opportunities, including an orientation program, and the array of resources OGE provides to support agency ethics officials.

OGE provides briefings to new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public's trust. In addition, OGE shares trainings and tools targeted to supervisors regarding their roles and responsibilities as ethical leaders. Finally, through ongoing research and partnerships with others, OGE shares tools and tactics for leaders to use to effectively communicate the ethical expectations for their organizations.

Effectuating Transparency

OGE’s website is its main communication tool and most important resource for OGE’s stakeholders, including agency officials, the media, and the general public. OGE’s website ensures public access to ethics documents, as well as ethics officials’ access to key resources needed to perform their jobs.

OGE has adopted the philosophy that public availability of government ethics information assures the American public that its senior leaders are making decisions based on the interests of the public rather than their own personal financial interests. The availability of this information assists executive branch employees in understanding the basic obligations of public service, holds OGE accountable for its activities, and supports ethics officials in carrying out the duties of their positions. For this reason, OGE has made a concerted effort to post useful information on its website. See page [38](#) of the Appendix for an outline of resources available on OGE’s website.



Critical Management Practices

OGE's senior leadership is committed to the highest standards of excellence. To that end, leadership keeps a constant focus on maintaining and continuing to cultivate its culture of compliance and excellence in critical management practices that enhance the quality and effectiveness of OGE's work.

Fiscal Responsibility

OGE is an excellent steward of taxpayer resources, continuously improving how the agency accomplishes its work, demonstrating strong performance, and supporting an engaged and accountable workforce.

OGE maintains strong internal controls, receives consistently clean audits, earns strong Federal Employee Viewpoint scores, and has an excellent record of performance management. In addition, OGE assesses and implements cost-cutting opportunities as a regular business practice. For example, OGE has reduced its office space costs by shrinking its footprint by over 70% and by digitizing all of its paper records. OGE has also used in-house information technology specialists to design, develop, and create internal applications, significantly increasing staff efficiency and reducing contracting costs. In addition, as a regular business practice, OGE maximizes its use of shared service providers for financial management, procurement, human resources, travel, training, and security, further reducing personnel costs and increasing access to expertise.



OGE seizes opportunities to leverage resources and technology to achieve savings in administrative costs associated with a wide variety of its mission work – something OGE has been able to do with great success.

For additional information about OGE's budget, please see the appendix beginning on [page 33](#).

Sustaining a Performance Culture & Employee Development

OGE's highly cross-functional staff is essential in carrying out its vital work of promulgating, maintaining, and advising on enforceable standards of ethical conduct for more than 2.7 million employees in over 140 executive branch agencies, including the White House; offering education and training to the more than 5,000 ethics officials executive branchwide; and overseeing a financial disclosure system that reaches more than 26,000 public and nearly 390,000 confidential financial disclosure report filers. The cross-functionality of OGE's staff facilitates critical employee development and allows OGE to maintain its strong culture of performance.

OGE's [Federal Employee Viewpoint Survey \(FEVS\)](#) results reflect OGE's strong culture of performance. For example, in the most recent FEVS survey, OGE scored 97% on the Performance Index, which reflects questions in four areas: (1) meets customer needs, (2) contributes to agency performance, (3) produces high quality work, and (4) adapts to changing priorities. OGE's annual Federal Employee Viewpoint Survey results are available on [OGE's website](#).



“One hundred percent (100%) of staff strongly agreed or agreed that their supervisor holds them accountable for achieving results (FEVS, 2024)”

OGE sustains its strong culture of performance management through extensive accountability, development, and performance mechanisms. Continued attention to these areas remains critical to the agency's operations and successful performance of its mission activities. OGE has implemented enterprise risk management practices and tracks its progress toward annual performance goals by holding quarterly all-hands meetings; conducting mid-year strategic objective reviews; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

OGE recognizes high-performing employees through its awards program, which includes spot awards and year-end performance bonuses. In particular, OGE's spot awards ensure that employees are rewarded for outstanding work throughout the year based on a transparent set of criteria and acknowledged at an annual employee recognition event. OGE also creates a series of recognition opportunities for staff during Public Service Recognition week each year and has a cross-divisional, staff-led Employee Recognition Group.

OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities, and by providing employees with dedicated time and resources to pursue professional development. OGE incorporates the requirements of the Employee Development Plan (EDP) into employees' and supervisors' performance standards. In this way, OGE confirms its commitment to continuous learning and employee professional development.

OGE provides internal and external training and development opportunities to its employees at all levels. OGE also holds regular training sessions for new employees, as well as other cross-functional meetings for employees within the agency, to share information and to develop and improve their knowledge and skills. These actions, collectively, ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved. OGE published its [Equity Action Plan](#) on its website and continues to implement its DEIA Strategic Plan, reflecting its whole-of-agency approach to advancing DEIA.



Compliance Activities & Process Improvement

As an agency with an executive branchwide mission of its own, OGE understands the importance of compliance with other government programs such as privacy, records management, FOIA, and IT security. As a result, OGE's leadership and staff approach this work with a view towards robust compliance through innovative process improvement, training, and timely annual program reporting. In all of its compliance activities, OGE strives to be a model agency by finding ways to increase efficiencies through creative use of electronic applications and revising standard operating procedures.

For example, OGE has developed a strong privacy program to ensure compliance with the Privacy Act, as well as privacy requirements established by OMB. OGE's Privacy Team reviews proposed IT systems and projects that collect and manage privacy protected information using an innovative application designed to assist staff in providing necessary information to complete a Privacy Threshold Analysis or recertify existing IT systems and projects. The team regularly timely prepares and updates privacy-related program documents, such as System of Records Notices and Privacy Impact Assessments. OGE's Privacy Team works with the CIO on IT system security reviews for OGE's network and *INTEGRITY*.

OGE maintains strong Freedom of Information Act (FOIA) and records management programs, both of which are consistently rated as compliant, even as new requirements are imposed.

With regard to FOIA, OGE has increased the number of documents available to the public on its website by proactively posting most documents released to requestors and devoting resources to responding to requestors. With regard to its records management program, OGE has established policies to ensure that OGE's records are maintained, handled, and disposed of in accordance with NARA requirements.



OGE demonstrates its commitment to compliance by providing regular required training to its employees and by timely submitting responses to data calls from oversight agencies in areas including IT security, privacy, FOIA, records management, information quality, Equal Employment Opportunity, and whistleblower reprisal, in addition to providing innovative annual internal ethics training for its staff and managers. OGE consistently meets 100% of its annual training goals and the reporting requirements in all of these programs.

Increasing Efficiency & Effectiveness Through Secure IT

OGE actively seeks to harness technology to improve the agency's ability to deliver on its mission and conduct its business more efficiently and effectively. OGE has developed and redesigned numerous applications that have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. OGE devotes resources to applications that support major mission programs, such as the Desk Officer Program, the Annual Questionnaire, the records program, and financial disclosure tracking, as well as those applications that support agency operations and compliance, including Privacy Act compliance, requisition processing, budget formulation, and equipment tracking. In addition, OGE's website is its main communication tool and the most valuable resource for OGE's stakeholders, including agency officials, the media, and the general public. OGE has significantly improved public access to ethics documents and ethics officials' access to key resources needed to perform their jobs.

OGE is highly responsive to the potential security threats against automated systems as those threats grow and become more complex. OGE actively seeks to ensure that any threats are reduced and mitigated, if not eliminated. OGE upgraded its infrastructure to mitigate the risk of potential failure, to address evolving technology, and to prevent security breaches. OGE has completed IT updates necessary to maintain the security and efficiency of OGE's ongoing daily operations. OGE ensures a safe and secure IT environment that protects the privacy and integrity of financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch as part of the financial disclosure review process. OGE recently moved its network to a securzze, FedRAMP-certified government cloud environment, which enhances compliance with National Institute of Standards and Technology guidelines, simplifies network disaster recovery, allowed OGE to shrink its physical office space, and provides network access independent of conditions at OGE's physical work location.



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OGE & The Executive Branch Ethics Program

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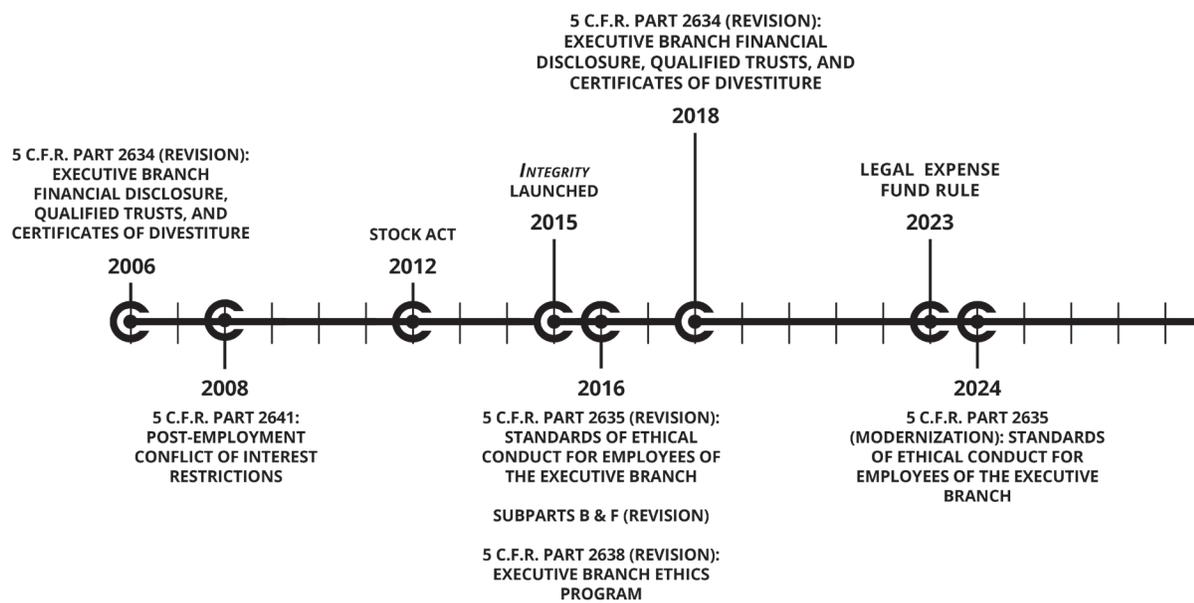
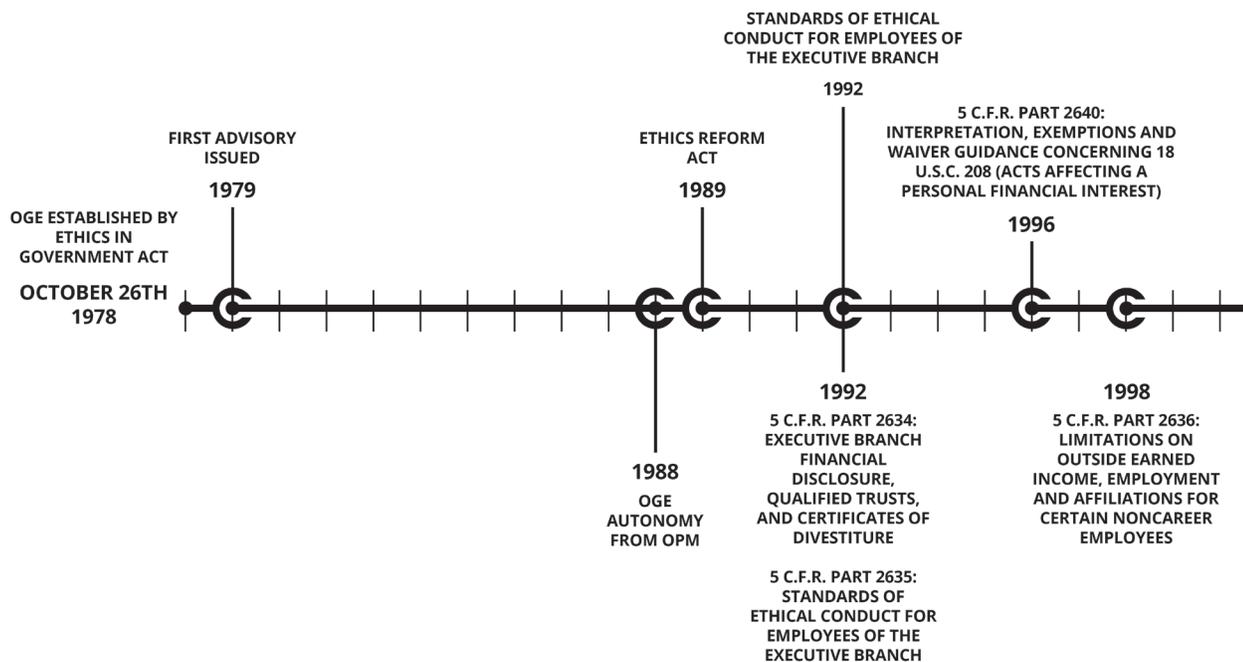
Public Service Is A Public Trust

OGE was created and tasked to lead the executive branchwide ethics program as part of the post-watergate reforms in 1978 and became a stand-alone agency in 1988. Major milestones are captured in the timeline below:

OGE’S MISSION AND MANDATE

“Provide overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest.”

TIMELINE OF THE U.S. OFFICE OF GOVERNMENT ETHICS



Learn more about OGE's history: www.oge.gov/web/oge.nsf/about_our-history

Agencies' Role in Implementing the Ethics Program

The executive branch ethics program is a shared responsibility. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. The head of each agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.

The agency head is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. Each agency's employees, supervisors, human resources officials, and Inspector General also play a significant role in maintaining the integrity of government programs and operations. Each of their unique responsibilities are described in 5 C.F.R. part 2638.

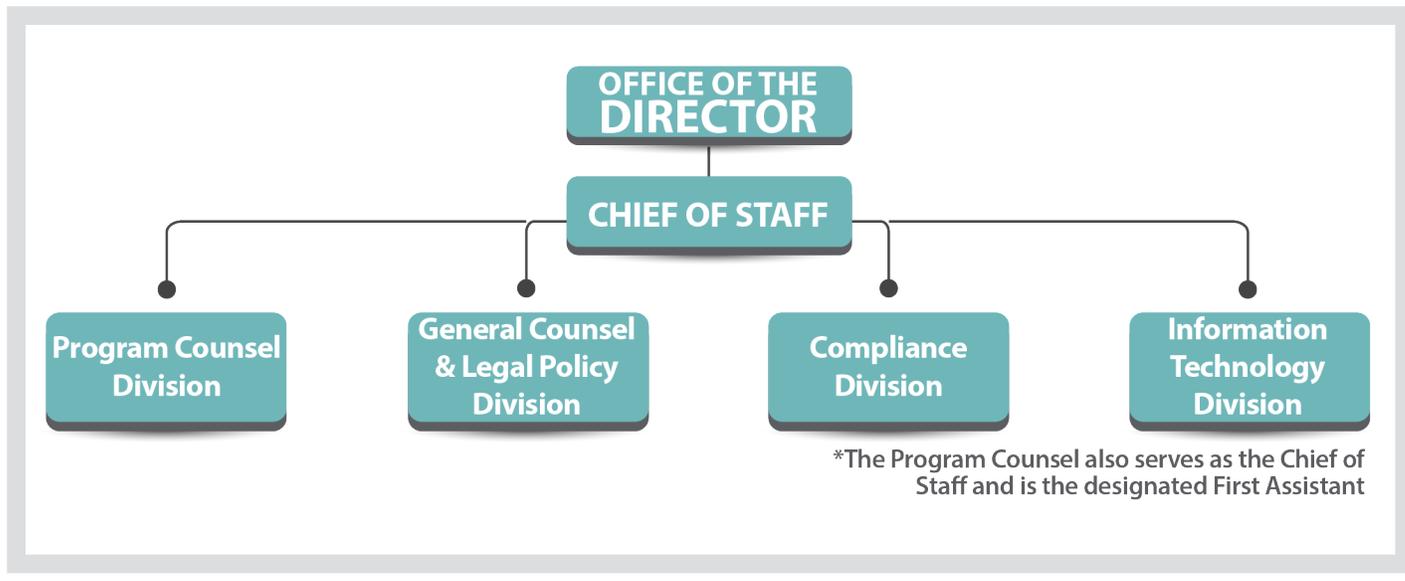


OGE's Role in the Framework of Institutional Integrity in the Executive Branch

OGE undertakes its unique prevention mission as part of a framework comprising executive branch agencies and entities whose work focuses on institutional integrity. There are important anticorruption issues outside of the ethics program that are handled by other agencies. This figure shows other agencies that are responsible for implementing programs that share important goals.



OGE's Structure, Management, and Workforce



OGE's Career Leadership Team

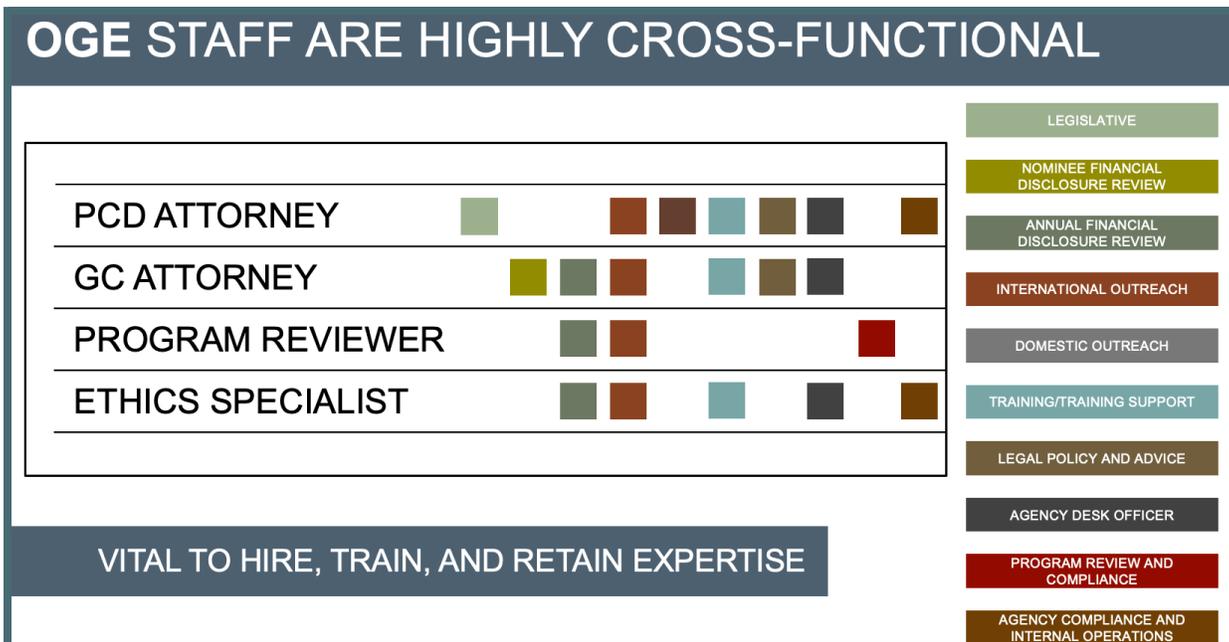
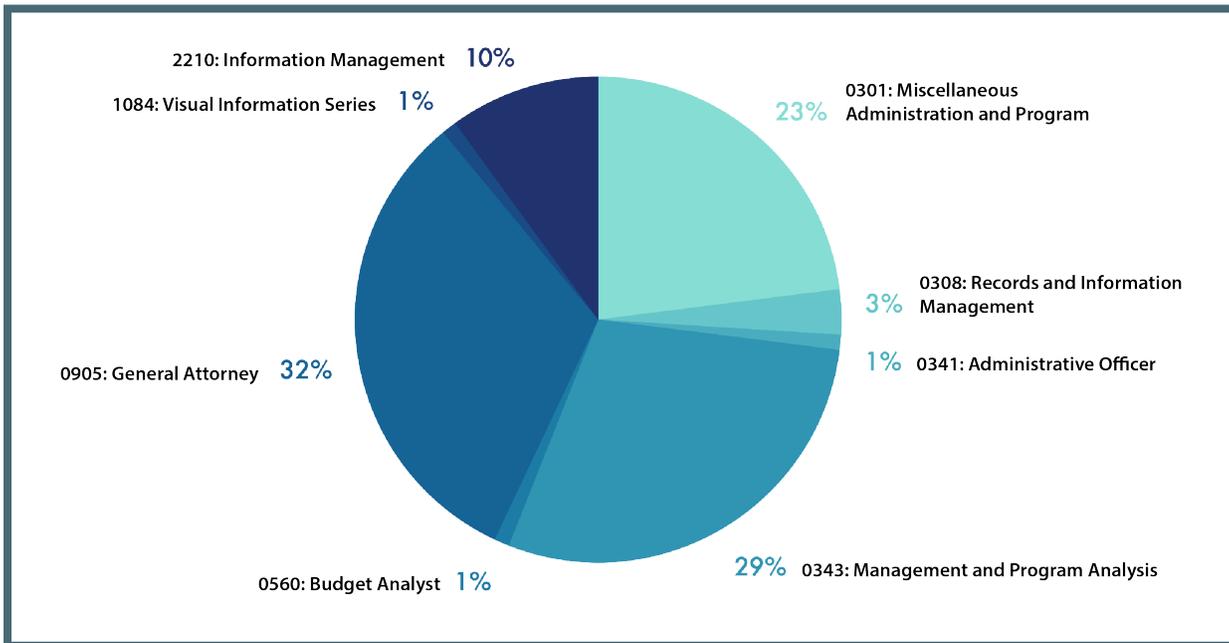


OGE's Career Leadership Team

Legal, External Affairs, & Performance Branch: Diana Veilleux
Agency Assistance Branch: Nicole Stein
Ethics Law & Policy Branch: Seth Jaffe
Presidential Nominations Branch: Deborah Bortot
Incumbent Financial Disclosure Branch: Megan Granahan
Program Review Branch: Stephanie Bonhomme
Information Technology Division: Ty Cooper

Enterprise Workforce Data (As Of 9/11/24)

Size of OGE's Workforce: 69 Retirement Eligible: 17



OGE's Budget

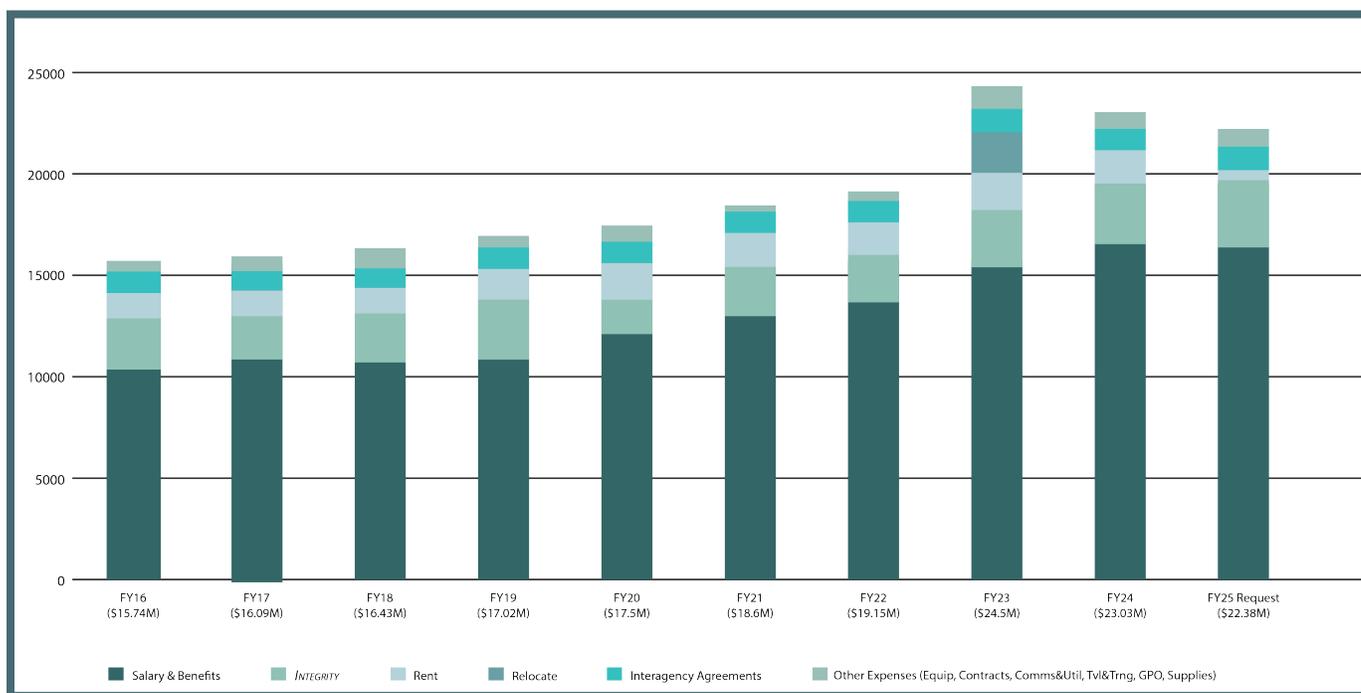
Funding Sources

OGE has a one-year appropriation and is dependent on a timely appropriations process in order to most effectively and efficiently carry out its mission. OGE's appropriation is currently included in the Financial Services and General Government appropriations bill in both the House and Senate. For the White House Office of Management and Budget (OMB), OGE is within the Labor Branch.

FY2025 Funding

Requested: \$22,386,000

Current status: OGE, like many federal agencies, is currently operating under a continuing resolution, through December 20, 2024. OGE's appropriations in Pub. L. 118-47 (FY24 appropriations) was \$23,037,000.



OGE has virtually no resources for discretionary expenditures

Nearly every dollar OGE receives is necessary to meet a mission-critical or mandated expense:

- 75% of OGE’s operational budget is dedicated to salaries and related expenses for OGE’s most valuable asset: its staff, who work tirelessly to carry out the day-to-day work to accomplish the agency’s vital mission of preventing conflicts of interest in the executive branch.
- Nearly 15% of OGE’s annual budget is necessary to fund OGE’s congressionally mandated, electronic filing system for public financial disclosure, Integrity, which provides free services to nearly all of the 26,000 public filers across the executive branch.
- Approximately 6% of OGE’s budget is required to be spent on rent and interagency agreements.
- This leaves only approximately 4% of OGE’s budget for the remainder of the agency’s expenses (training, printing, supplies, etc.).

OGE faces appropriations challenges and fiscal risks

Uncertainty in the appropriations process has rendered it difficult for OGE to fully use its resources and meet vital needs, such as hiring, as well as systems and other mission critical activities under one-year funding constraints. Such constraints result in lost appropriations to meet needs, fill positions, and fully serve the executive branch ethics program. OGE regularly requests (and receives) congressional permission to use 50% of its unobligated balances from the prior fiscal year because it cannot afford to leave any available funds unspent. These funds are usually requested for unanticipated enhancements to *INTEGRITY* or IT security remediation efforts.

In addition to the challenges presented by one-year funding and delayed appropriations, OGE regularly faces fiscal risks caused by unfunded mandates and unfunded pay raises, as well as the inability to be funded in amounts that acknowledge inflation and mandatory increases in payments to other federal agencies over which OGE has no control. Because OGE receives so little funding for discretionary expenditures, there is little room to meet the challenges of inevitable contingencies, such as major IT repairs/replacements or unplanned exigencies, such as litigation or unexpected staff retirements/departures that cause fiscal strain due to potentially large, required lump sum payments.

Congressional Considerations and Stakeholder Proposals to Reform Ethics

OGE is the subject of significant and intense congressional and stakeholder interest. OGE is currently tracking more than 175 bills that could impact OGE, many of which would make significant statutory revisions to the [Ethics in Government Act](#) or [criminal conflict of interest statutes](#), or create new ethics-related statutes. Passage of major ethics reforms would present significant challenges for OGE, and in some cases would require OGE to take on significant new responsibilities without funding for additional staff or other resources.

OGE actively provides technical assistance on proposals and is a trusted source of information and expertise on ethics for many congressional committees and staff. For example, over the last four years, OGE has provided more than 40 formal responses or [official correspondence](#) to members of Congress and provided more than 100 technical assistance calls or briefings for congressional staff. OGE also supports the Government Accountability Office in reviews on ethics matters and responds to inquiries from the Congressional Research Service.



OGE Operational/Programmatic Challenges

1. Erosion of public trust

Public misunderstanding, politicization of ethics, and disconnection between prevention and enforcement all present significant operational and programmatic challenges to OGE and the executive branch ethics program. Despite these challenges, OGE works tirelessly with agencies across the executive branch to build and retain the public's trust. OGE's mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch is an essential component of the public's confidence in the integrity of executive branch programs and operations. If these efforts at prevention fall short and senior leaders disregard ethics risks, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public's trust in government may be eroded. In recent years, OGE has taken steps to increase transparency, provide public-friendly content and opportunities for engagement, and make ethics waiver information more available to the public. OGE has also worked to hold agencies accountable for compliant ethics programs, and make sure that leaders have well-trained ethics officials to help them navigate their ethical responsibilities.

2. Maintaining stability & security for key it systems

With a hybrid workforce, the availability of OGE's virtual network is more critical than ever, and any unscheduled downtime has an even greater impact on operations. As potential security threats against automated systems grow and become more complex, OGE remains proactive to ensure that any threats are reduced and mitigated, if not eliminated. OGE has taken several steps to secure its IT systems, including undergoing independent, third-party assessments; complying with key government-wide directives; and leveraging both internal and external expertise and resources. OGE will continue to address IT security threats and to commit significant resources to secure its important IT systems and network. OGE will also seek, despite its small staff and limited resources, to remain responsive and compliant to new cybersecurity directives. In addition, OGE recently further secured its systems by implementing a comprehensive replacement of its IT infrastructure through procuring new equipment and by migrating to a secure, FedRAMP-certified government cloud environment.



“The issue of ethics in government is viewed as a serious problem by about as many people (67%) as drug addiction – the top issue, at 70%.”

3. Hiring, development, and retention of staff

Only with the necessary complement of its expert, cross-functional staff working at full capacity can OGE continue to keep pace with its increasing workload and support the needs of the executive branch ethics program. More than 20% of OGE's workforce is eligible to retire. While OGE has plans in place to fill critical positions, the gap in between someone leaving and training a new hire can have an impact on associated work. In addition, with increased workload due to the Presidential transition, expert staff are critical not only at OGE but throughout the government and other federal agencies, so pulling expertise from the same pool of people within the ethics community can create significant challenges.

4. Workload and unfunded mandates

OGE produces a remarkable amount with a small staff by carefully managing the cyclical nature of the agency's work and leveraging its highly cross-functional professional employees. Although agile, significant unanticipated changes in workload have impacts across programs. For example, dramatic increases in public, press, congressional, and FOIA requests can strain staff resources, stretch cross-functional abilities, and require additional cross-training to keep pace with demands. There are also ongoing and growing compliance requirements that must be addressed with no lead time or new resources to support them, such as unanticipated human resources, privacy, and data-focused executive orders, OMB directives, laws, and regulations. Notably, in response to the most recent Federal Employee Viewpoint Survey, only forty-nine percent (49%) of respondents strongly agreed or agreed that their workload was reasonable.

5. Clearance and regulatory process

To develop regulations, OGE is subject to DOJ and OPM review (per the Ethics in Government Act) as well as the OMB clearance process before reaching the statutorily required public notice and comment process. This process limits OGE's ability to timely respond to emerging regulatory issues, but OGE has taken steps to minimize unnecessary delays.

6. Supporting a well-resourced ethics program

The executive branch ethics program is decentralized, and its success depends not only on OGE's work but also on the commitment of ethics officials and leadership at each executive branch agency. In a landscape of tightening resources, OGE will continue to face challenges in ensuring that agency ethics programs across government are adequately resourced and supported. OGE will both provide support and require accountability to promote well-resourced ethics programs by delivering resources, engaging with agency leaders, and conducting oversight.

OGE's Website

Access Ethics Documents

- [Officials' Individual Disclosures Search Collection](#): Financial Disclosure Reports, Certificates of Divestiture, Ethics Pledge Waivers, Ethics Agreements, Certificates of Ethics Agreement Compliance, Conflict of Interest Waivers
- [Agency Ethics Documents Search Collection](#): Program Review Reports, Annual Agency Ethics Program Questionnaires, Oversight Correspondence with Agencies, 1353 Travel Reports
- [Oversight Summary Reports](#) & [Compliance Dashboards](#): Executive Branchwide Reports and Data
- [Freedom of Information Act \(FOIA\)](#): Electronic Records Room, FOIA-Processed Records Repository, Reports, Request Procedure, Contacts, Guide

Resources For Ethics Officials

- [Conduct Legal Research](#): Statutes, Executive Orders, OGE Regulations, Agency Supplemental Regulations, Federal Register Issuances, OGE Advisories, Legal Interpretations (DOJ and Judicial Opinions)
- [Institute for Ethics in Government Trainings](#): Upcoming Courses, On-Demand Courses, Training Curricula, Job Aids
- [Managing Effective Ethics Programs](#)
 - » [Mission, Authority, & Key Players](#); [Ethical Leadership & Building an Ethical Culture](#); [Conflicts Analysis & Resolution](#); [Education through Training & Advice](#); [Financial Disclosure](#); [Election Readiness](#); [Enforcement Responsibilities](#); [OGE Oversight](#); [OGE Support](#); [Professional Development for Ethics Officials](#); [Records Management & Release](#); [OGE Forms Library](#); [Legal Expense Funds](#)

Resources for Federal Employees

- [Agency Ethics Program Contact Information](#)
- [Resources for Financial Disclosure Filers](#)
- [Standards of Conduct for Employees of the Executive Branch](#)

News

- [Leadership Notes](#)
- [News Releases](#)
- [Press Contacts](#)

About OGE

- Our Mission, Role, and History
 - » [What We Do](#)
 - » [Budget and Performance Reports](#)
 - » [Our History](#)
 - » [Information Management](#)
 - » [Internal Agency Policies](#)

- Our People and Organization
 - » [Agency Leadership](#)
 - » [Organization](#)
 - » [Employee Engagement](#)

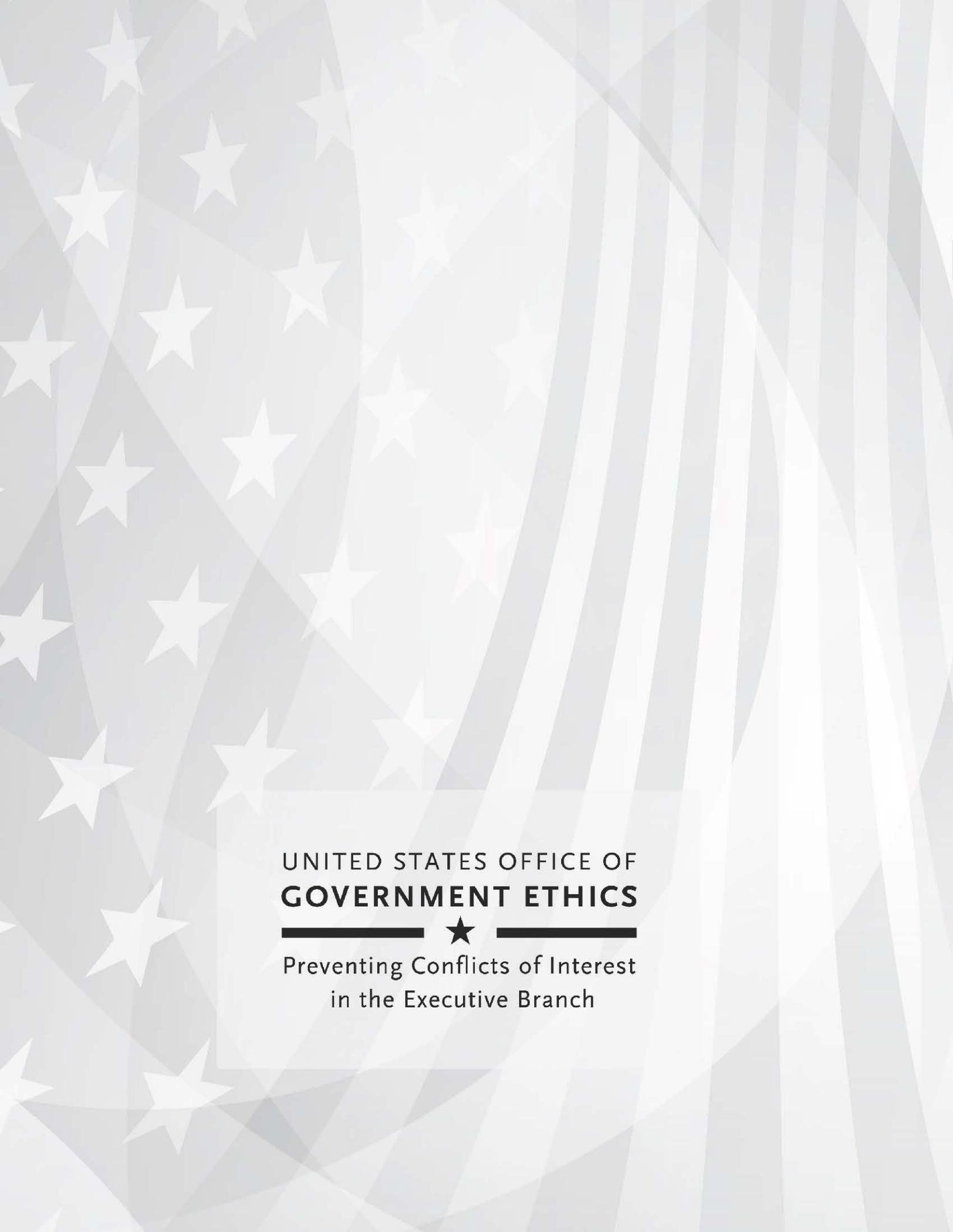
- Government Partners in Integrity
 - » [Resources for Reporting Misconduct](#)
 - » [Resources for International Anti-Corruption Bodies](#)

- Legislative Affairs
 - » [Ethics Legislation](#)
 - » [Congressional Correspondence](#)
 - » [Reports to Congress](#)
 - » [Appropriations](#)

- Contact
 - » [Contact Us](#)
 - » [Agency Ethics Program Contact Information](#)
 - » [Careers](#)

Available On Other Websites:

- [Integrity.gov](#): OGE's electronic filing system for public financial disclosures
- [OGE's YouTube Channel](#): training videos produced by OGE
- [OGE's Twitter account @OfficeGovEthics](#)
- [OGE's LinkedIn account](#)



UNITED STATES OFFICE OF
GOVERNMENT ETHICS

— ★ —
Preventing Conflicts of Interest
in the Executive Branch