

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

Summary of Performance
and Financial Information
Fiscal Year 2015

OVERVIEW

The U.S. Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978, provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. OGE’s mission is part of the very foundation of public service. The first principle in the Fourteen Principles of Ethical Conduct for Government Officers and Employees is, “[p]ublic service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.” Public servants are expected to make impartial decisions based on the interests of the public when performing their job duties. OGE, in concert with agency ethics practitioners throughout the executive branch, ensures that executive branch employees fulfill this great trust.

To carry out its leadership and oversight responsibilities, OGE promulgates and maintains enforceable standards of ethical conduct for approximately 2.7 million employees in over 130 executive branch agencies and the White House; oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers; ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations; provides education and training to the more than 4,500 ethics officials executive branch-wide; conducts outreach to the general public, the private sector, and civil society; and provides technical assistance to state, local, and foreign governments and international organizations.

OGE Mission

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

Advance a strong **uniform** executive branch ethics program

Interpret and advise on ethics laws, policies, and program management issues

Hold executive branch agencies accountable for carrying out effective ethics programs

Contribute to the professional development of ethics officials

Modernize and implement the ethics rules and regulations

Contribute to the **continuity** of senior leadership in the executive branch

Assist in the President’s constitutional duty to nominate and appoint officers to the executive branch

Support succession planning in executive branch ethics programs

Promote leadership support of the executive branch ethics program

Promote **transparency** of the executive branch ethics program

Raise the visibility of the systems in place to identify and resolve conflicts of interest

Make ethics documents publicly available

Management Objectives

Promote professional development opportunities aimed at building OGE employees’ knowledge, skills, and abilities
Transform the way OGE conducts business through process improvement

FINANCIAL HIGHLIGHTS

OGE is committed to effectively and efficiently manage the funds appropriated by Congress to execute its important mission. There were no significant changes to OGE’s financial position in fiscal year 2015. OGE’s financial statements and footnotes appear in the Part III of [OGE’s Annual Financial Report for FY 2015](#).

Selected Financial Data	2014	2015
Total Assets	\$9,813,490	\$8,306,839
Total Liabilities	\$1,738,019	\$1,543,137
Net Cost of Operations	\$11,912,015	\$17,014,534

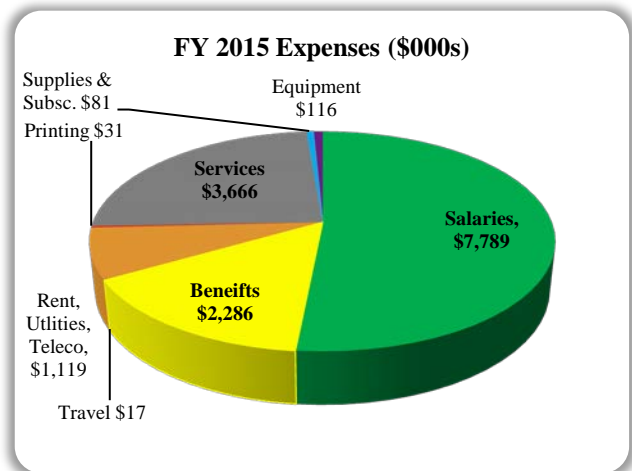
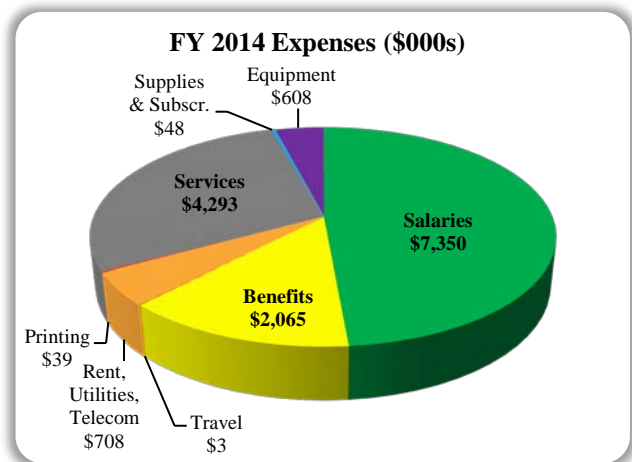
In fiscal year 2015, OGE maintained an unmodified opinion on its financial statements and no material internal control weaknesses were found by independent auditors.

Salaries & Benefits

OGE is a lean [organization](#), operating with fewer than its 80 authorized full-time equivalents. OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and finance experts, and support personnel who work in concert to carry out OGE’s mission.

Integrity

In fiscal year 2015, OGE provided sound stewardship of the government’s fiscal resources by reducing fragmentation, overlap, and duplication within the executive branch through *Integrity*, its newly-deployed electronic filing system. As mentioned in OGE’s performance highlights, in fiscal year 2015 OGE successfully launched its secure, web-based electronic filing system for executive branch public financial disclosure report (OGE Forms 278e and 278T) filers mandated by the STOCK Act. The system is offered without charge to all executive branch agencies, and to date, over 115 agencies and nearly 11,000 senior executives and Presidential appointees have registered. Notably, several agencies have decided to adopt *Integrity* for all or substantially all of their public filers rather than continuing to use third-party fee-for-use electronic filing systems.



PERFORMANCE HIGHLIGHTS

In fiscal year 2015, OGE met or exceeded each of its performance goals. Below are performance highlights from each of OGE’s major activities that support OGE’s strategic goals. These highlights demonstrate that OGE has been successful in achieving its strategic goals and accomplishing its mission.



- Above Target
- Below Target

Strategic Goal 1: Advance a strong uniform executive branch ethics program.



- Above Target
- Below Target

OGE is the supervising ethics office for a decentralized ethics community comprised of thousands of ethics officials in over 130 agencies across the executive branch. OGE’s Desk Officer program serves as a vital communications link to this ethics

community. OGE’s Desk Officers provide agencies with assistance in resolving difficult ethics issues requiring expertise that only the supervising ethics office can offer. OGE also issues advisories to disseminate critical information to the executive branch ethics community and to promote uniform, consistent interpretation of ethics laws, regulations, and policies. OGE found that 94% of the respondents to the fiscal year 2015 Annual Survey of Ethics Officials believe that OGE advisories help them perform for their job duties.

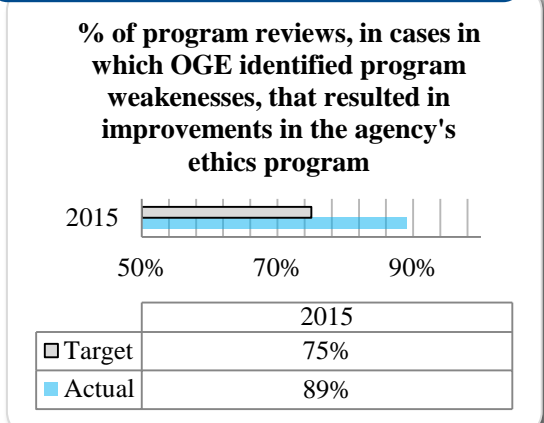
91% of ethics officials believe that OGE Desk Officer assistance helps them perform their duties

Desk Officers responded to over 1,800 requests for assistance

OGE issued 16 advisories

89% of ethics officials felt that OGE timely communicates ethics-related information.

OGE conducted 57 agency ethics program reviews and issued 44 recommendations



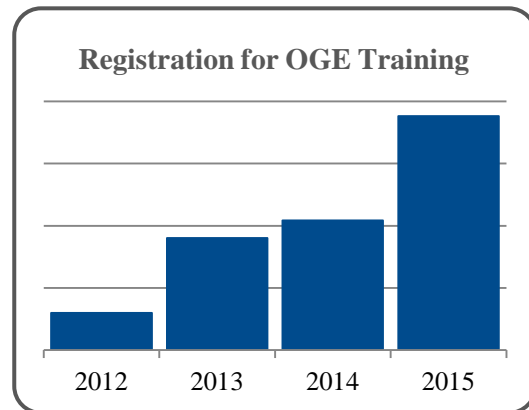
89% of program reviews that identified program weaknesses resulted in improvements in the agency’s ethics program

In addition to providing day-to-day assistance through the Desk Officer program and issuing advisories, OGE holds executive branch agencies accountable for carrying out an effective ethics program by conducting agency ethics program reviews and reviewing the financial disclosure reports of senior executive branch officials. Through ethics program reviews — plenary reviews and inspections — OGE evaluates agency ethics programs. Where necessary, OGE provides recommendations for program improvement, suggests remedial actions to correct deficiencies, and follows up with agencies on implementation of the recommendations.

OGE also reviews the annual, termination, and transaction financial disclosure reports of executive branch leaders appointed by the President and confirmed by the Senate (PAS), as well as other reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. In fiscal year 2015, OGE reviewed over 1,800 public financial disclosure reports (new entrant, annual, termination, and periodic transaction reports). The timely review of these reports helps ensure that these senior officials remain free from conflicts of interest. Ninety-seven percent of the reports required to be submitted to OGE were reviewed within 60 days of receipt by OGE.

OGE's success in leading the decentralized executive branch ethics program relies greatly on a highly-trained community of ethics officials. In fiscal year 2015, OGE provided an array of educational opportunities to ensure that ethics officials had access to the expertise and tools they needed to do their jobs. Leveraging technology and existing resources, OGE was able to provide these opportunities to agencies free of charge.

Since refocusing its efforts and leveraging technology to provide more widely-available training opportunities for ethics officials, OGE has increased registrations for its educational opportunities from about 1,200 registrations in fiscal year 2012 to more than 7,500 in fiscal year 2015, an increase of more than 500%. Not only is the quantity of OGE training noteworthy, so is the quality. The overwhelming majority of registrants for OGE's educational offerings rated the quality very highly on course evaluations.



Ethics regulations serve as the building blocks of the executive branch ethics program. OGE reviews and revises the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21st century government. In fiscal year 2015, OGE made significant progress toward finalizing key regulatory changes to the Standards of Ethical Conduct for Employees of the Executive Branch found at 5 C.F.R. part 2635 (Standards of Conduct). The Standards of Conduct serve as the foundation of federal government employment and set the expectations of conduct for every executive branch employee. OGE targeted for revision two areas of significant interest to ethics officials and employees: gifts and seeking employment (Subparts B and F of part 2635). OGE focused on the gift rules because they generate more questions from agency ethics officials and employees than any other area of the Standards of Conduct and OGE focused on the rules governing seeking employment because they were affected by new reporting and recusal requirements that were enacted as part of the STOCK Act.

Strategic Goal 2: Contribute to the continuity of senior leadership in the executive branch.



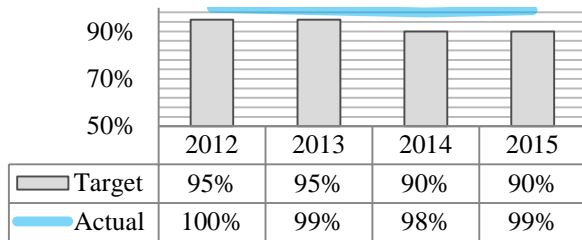
- Above Target
- Below Target

OGE contributes to the continuity of senior leadership in the executive branch by assisting in the President’s constitutional duty to nominate and appoint officers to the executive branch, supporting succession planning programs, and promoting leadership support of the executive branch ethics program overall.

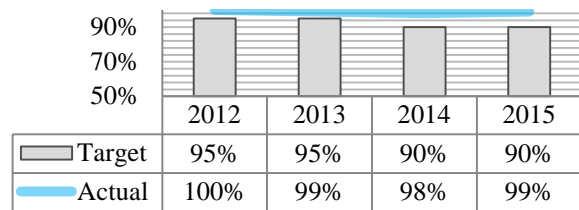
OGE reviews the financial interests of Presidentially appointed, Senate-confirmed (PAS) nominees for possible conflicts of interest with their prospective duties. OGE also identifies and resolves potential conflicts of interest on the part of nominees by establishing written ethics agreements with them prior to confirmation. For most PAS nominees, OGE’s financial disclosure program represents their first encounter with the ethics requirements of the executive branch. Thus, the ethics review of PAS nominees’ financial interests provides OGE with the opportunity to impress upon these most senior executive branch officials the importance of their roles as top leaders in creating and fostering an ethical culture at their agencies.

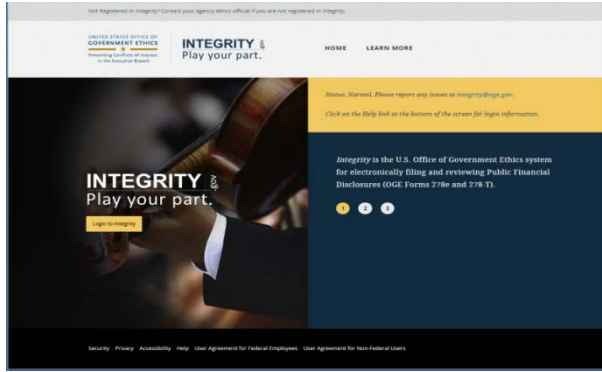
In fiscal year 2015, OGE reviewed the reports of nominees for approximately 22% of the PAS positions. OGE measures its performance based on the successful and timely resolution of conflicts and technical reporting issues for nominee financial disclosure reports. OGE’s standard is to resolve conflict of interest and technical reporting issues no later than five days after a nomination is made. OGE continues to exceed its targets in this area.

OGE successfully resolves technical reporting issues in financial disclosure reports of Presidential nominees for Senate- confirmed appointments no later than five days after nomination



Identifiable, substantive conflicts of interest of Presidential nominees for Senate-confirmed appointments are successfully resolved by ethics agreements no later than five days after nomination





Also in fiscal year 2015, OGE launched *Integrity*, OGE’s system for electronically filing and reviewing public financial disclosure reports (OGE Forms 278e and 278-T) submitted by certain high-level executive branch officials. *Integrity* significantly enhances the filing, review, and program management aspects of the executive branch public financial disclosure program. A combination of data-entry tables and context-dependent questions helps filers identify all of their reportable financial interests and to

disclose those interests correctly. *Integrity* also enables agency ethics officials to assign, review, track, and manage reports electronically.

In creating *Integrity*, OGE also focused on ensuring the security of user access and data maintenance. *Integrity* is a web-based application housed at the U.S. Department of Agriculture’s National Information Technology Center (NITC) in a secure government cloud. *Integrity* was authorized to operate after the system successfully underwent a full, independent security assessment. Both *Integrity*’s authentication provider (OMB MAX) and host (USDA NITC) are authorized under the Federal Risk and Authorization Management Program (FedRAMP). To comply with the Federal Information Security Management Act (FISMA), NITC follows the National Institute of Standards and Technology (NIST) Risk Management Framework for categorization, selection, development, implementation, assessment, authorization, and monitoring of security controls.

As part of the transition to *Integrity*, OGE redesigned the executive branch public financial disclosure form, the OGE Form 278. The new OGE Form 278e, which is available in both paper format (through an Excel spreadsheet) and a rendered format through *Integrity*, collects the same information required by the Ethics in Government Act but displays it in a more easily-understandable format. Specifically, OGE reorganized the disclosure of information based on its experience that filers, particularly filers entering government service for the first time, have difficulty accurately reporting the financial interests related to their employment and their spouses’ employment. By segregating financial interests related to the outside employment of filers and their spouses, the OGE Form 278e reduces the risk of errors and inadvertent omissions. This structure also promotes transparency by highlighting information of significant interest to the public.

Strategic Goal 3: Promote transparency of the executive branch ethics program.



- Above Target
- Below Target

OGE directs resources toward raising the visibility of the systems in place to identify and resolve conflicts of interest, and making ethics documents publicly available. Transparency increases accountability and builds public confidence in the impartiality of government decision making.

In fiscal year 2015, OGE worked to increase the number of external stakeholders that are aware of OGE and the executive branch ethics program. OGE's website is its primary tool for communicating with these stakeholders, but OGE also used social media to broaden its reach. Specifically, OGE uses its [Twitter](#) account to drive traffic to substantive ethics content on its website and to provide information about the executive branch ethics program to the public.

First-time visitors to [www.oge.gov](#) increased by 10%.

478,417 people visited [www.oge.gov](#)



OGE also responded to 726 requests for information and assistance from its non-executive branch external stakeholders on topics such as public financial disclosure, gifts from outside sources, and post-employment restrictions. This assistance increases OGE's external stakeholders' understanding of the executive branch ethics program and related ethics rules and regulations.

In fiscal year 2015, OGE continued its efforts to make a broad array of ethics documents available to the public including legal advisories, laws and regulations, travel reports, training materials, and financial disclosure reports. For example, OGE assists citizens in ensuring that the leaders of their government are free from conflicts of interest by timely making available on its website the public financial disclosure reports and ethics agreements of the most senior officials in the executive branch. OGE also helps citizens to assess the health of ethics programs across the executive branch by publishing ethics program review reports. These reports detail strengths and weaknesses of agency ethics programs as well as steps that agencies have taken to correct any deficiencies. OGE has taken steps to make access to these important documents as easy as possible by creating dedicated sections of its website for locating these documents and highlighting the availability of these documents on the OGE homepage.

Management Objectives: Promote professional development opportunities aimed at building OGE employees' knowledge, skills, and abilities. Transform the way OGE conducts business through process improvement.



- Above Target
- Below Target

In an effort to work smarter, OGE continued to review its processes and procedures for ways to improve the ethics community and its internal operations. Of note, in fiscal year 2015, OGE completed the digitization of

approximately 19,000 paper records containing over 1 million pages to conserve resources, maximize office space, and streamline OGE's records management process.

OGE developed or updated 20 standard operating procedures



USEFUL SITES

OGE’s homepage is www.oge.gov. Several of the more frequently-visited sites on OGE’s website are listed here:

General Information	
About OGE	http://www.oge.gov/About/About/
Organizational Chart	http://www.oge.gov/About/Organization/OGE-Organizational-Chart/
Performance and Strategic Documents	http://www.oge.gov/About/ManagementReports-and-Policies/Performance-and-Strategic-Docs/Performance--Strategic-Documents/
Important Dates and Deadlines	http://www.oge.gov/Program-Management/Dates-and-Deadlines/Dates-and-Deadlines/
Director’s Notes	http://www.oge.gov/Blog/Director_s_Notes/
International Activities	http://www.oge.gov/About/International-Activities/International-Activities/
Access to Records	
Forms Library	http://www.oge.gov/Forms-Library/Forms-Library/
Presidential Appointee and Nominee Records	http://www.oge.gov/Open-Government/Presidential-Appointee---Nominee-Records/
Program Review Reports	http://www.oge.gov/Program-Management/Program-Review/Program-Review-Reports/Program-Review-Reports/
Travel Reports	http://www.oge.gov/Open-Government/Travel-Reports/Travel-Reports/
Information Regarding the Ethics Laws and Regulations	
Ethics Laws and Regulations	http://www.oge.gov/Laws-and-Regulations/
Standards of Conduct	http://www.oge.gov/Laws-and-Regulations/Employee-Standards-of-Conduct/Employee-Standards-of-Conduct/
Legal Advisories	http://www.oge.gov/OGE-Advisories/Legal-Advisories/Legal-Advisories/
Ethics Training	
You Tube	https://www.youtube.com/user/OGEInstitute
Google+	https://plus.google.com/112724308837600656840/posts
OGE News	
News Media	http://www.oge.gov/Media-Resources/News-Releases/News-Releases/
RSS Feed	http://www.oge.gov/rss/ogenews.aspx
Twitter	https://twitter.com/officegovethics

For additional assistance, contact OGE by email at contactoge@oge.gov.