Mission

OGE provides direct support to the President in his constitutional duty to nominate and appoint officers. The U.S. Office of Government Ethics (OGE)'s unique statutory mission is to prevent conflicts of interest and oversee the executive branch ethics program, which is designed to ensure that the more than 2 million executive branch employees,

including the highest-level leaders, carry out their government duties in the public interest. The key elements of the ethics program are enforceable written standards, training and

counseling, financial disclosure, oversight and transparency. Without OGE and the important ethics program it leads, 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.



Figure 1: Program Elements of the Ethics Program

Organizational Structure



OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE's greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed by the President and confirmed by the Senate to a five-year term. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE's Chief of Staff and senior leadership, who work in concert to carry out OGE's mission.

OGE and Executive Branch Agencies: A Shared Responsibility



Keeping the public's trust is a shared responsibility between the Office of Government Ethics (OGE) and executive branch agencies. OGE sets the rules to help prevent conflicts of interest and unethical behavior. Each agency leader is in charge of making sure their agency follows these rules. They must also demonstrate ethical leadership and give their teams the tools they need to succeed. The leader also picks a Designated Agency Ethics Official (DAEO) to run the agency's ethics program and work with OGE. Other staff, like supervisors, HR, and Inspectors General, are also needed for a strong ethics program.

Strategic Goal I: Help Top Executive Branch Officials Resolve Conflicts of Interest and Meet their Ethics Responsibilities

Strategic Objective 1.1: Assist the President and the Senate in the Presidential appointments process and foster ethical leadership in senior officials

Strategies:

- Conduct expert, second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions.
- Use ethics expertise to work with agencies and filers to identify and resolve potential conflicts of interest of incoming senior leaders.
- Use ethics expertise to work with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act.
- Encourage senior leaders' support of the ethics program.
- Maintain specific regulatory ethics standards for senior leaders and managers.

U.S. OGE provides direct support to PAS nominees/agency heads/senior leaders and to the agency ethics officials who support them



Performance Indicators:

- o Timeliness of providing initial comments on PAS nominee disclosure reports
- Timeliness of certifying final PAS reports
- # of PAS nominee reports pre-cleared and average review times
- # of communications (welcome letters, year-end letters, program review reports, Leadership Notes, SES trainings) provided to senior leaders about ethics
- # of senior leaders receiving a communication from OGE about ethics

Strategic Objective 1.2: Monitor senior leaders' compliance with individual ethics responsibilities and responsibilities

Strategies:

- Collect and publish documentation of senior agency leaders' compliance with their individual ethics commitments.
- Conduct expert, second-level reviews of senior agency leaders' new entrant, periodic, annual, and termination financial disclosure reports.

• Analyze, respond to requests for Certificates of Divestiture and make available to the public those approved/issued by OGE.

Performance Indicators:

- o % of Certificates of Ethics Agreement Compliance timely submitted
- # of Certificates of Divestiture issued
- Timeliness of OGE's review of public financial disclosure reports
- # of public financial disclosures closed

Strategic Objective 1.3:Lead the financial disclosure programs, including providing the executive branch e-filing system, *INTEGRITY*

Strategies:

- Operate INTEGRITY, the executive branch e-filing system for more than 90% of public filers.
- Maintain uniform procedures and requirements for financial disclosure.
- Maintain and update uniform public and confidential disclosure forms.
- Provide guidance on confidential and public financial disclosure programs and reporting requirements.
- Evaluate and respond to requests from agencies to use alternative financial disclosure forms.



Performance Indicators:

- Customer satisfaction with OGE's support of % INTEGRITY
- % of downtime of *INTEGRITY*
- Timeliness of forms renewal
- o Customer satisfaction with financial disclosure resources
- Independent security findings addressed
- System downtime/access to INTEGRITY

Strategic Objective 1.4: Carry out statutory responsibilities under the Presidential Transition Act

Strategies:

- Use decades of expertise to support the executive branch, campaigns, transition teams, and transitions councils in carrying out effective Presidential transitions.
- Prepare executive branch ethics officials to carry out their responsibilities during a Presidential transition.
- Update and publish key Presidential transition resources for a range of audiences.
- Engage and actively participate on government-wide transition councils.



- Use ethics expertise to work with agencies and major party Presidential candidates to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act.
- Make candidate disclosures available to the public prior to the Presidential election.
- Offer training and use of INTEGRITY, seamless electronic disclosure system, to Presidential campaigns, the Presidential Transition Teams, and the elected Administration.

Performance Indicators:

- Timeliness of resources, support, and availability of INTEGRITY
- Timeliness of review of Presidential candidate financial disclosures
- Participation in government-wide transition councils
- # of election readiness offerings
- Satisfaction of ethics officials with training and resources

Strategic Goal II: Advance a Strong, Consistent Executive Branch Ethics Program

Strategic Objective 2.1: Provide expert advice and support to ethics officials and other stakeholders

Strategies:

- Provide ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agency's leaders and employees.
- Use convening power to facilitate information sharing and create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies.
- Respond to the changing needs and challenges faced by agency ethics officials
- Respond to requests for expert advice from critical stakeholders, such as Congress, Inspectors General, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups.
- Support the vital work of the ethics enforcement communities.
- Participate in U.S. government anti-corruption efforts as requested by the Department of State.

- o Customer satisfaction with helpfulness and responsiveness of Desk Officers
- *#* of requests for assistance from ethics officials and rate of responsiveness
- $\circ~$ # of listserv messages and % of ethics officials on OGE's listserv
- o # of requests for technical assistance from other stakeholders

Strategic Objective 2.2: Strengthen the expertise of officials who are integral to the executive branch ethics program

Strategies:

- Provide development opportunities for senior ethics officials and aspiring ethics program leaders.
- Prepare ethics officials at all levels to train, advise, and support their agencies' employees and further their agencies' missions.
- Main experimentation
 Main experimentation
 Implementation
 Implement
- Maintain an online learning library for ethics officials at all levels of experience to develop their knowledge, skills, and abilities.
 - Improve the delivery and content of ethics education at agencies.
 - Educate other officials who are integral to the executive branch ethics program, such as human resource officials and Inspectors General.

Performance Indicators:

 \circ Customer satisfaction with helpfulness of OGE training offerings

- \circ # of offerings and # of registrants
- \circ # of online views of OGE's on-demand offerings
- # of certificates awarded

Strategic Objective 2.3: Continuously review and refine ethics requirements and advice to mitigate risk and address emerging issues

Strategies:

- Publish clear and understandable ethics rules and advice that address new requirements, respond to novel issues, and adapt to changes in the way government accomplishes its mission.
- Maintain and refine rules necessary to implement the executive branch ethics laws.
- Assist agencies in addressing agency-specific ethics program risks.
- Maintain up-to-date executive branchwide forms, privacy notices, and records schedules needed for a consistent program across 140+ agencies.

- Meet milestones for regulatory revisions
- Customer satisfaction with helpfulness of advice and counsel resources
- *#* of advice and counsel resources issued

Strategic Goal II: Hold Executive Branch Agencies Accountable for Carrying Out an Effective Ethics Program

Strategic Objective 3.1: Monitor agency compliance with executive branch ethics program requirements

Strategies:

- Identify program weaknesses (non-compliance) with ethics program requirements.
- Issue and publish recommendations requiring agencies to address program weaknesses and non-compliance with ethics program requirements.
- Follow-up on identified program weaknesses and non-compliance until resolved.
- Collect, evaluate, publish, and take action based on ethics program data.
- Collect, analyze, and publish information on potential ethics violations by executive branch employees.
- Hold agencies accountable by consulting on and providing guidance on the use of conflict-of-interest waivers.

Performance Indicators:

- # of recommendations for agency ethics program improvements issued and closed
- Timeliness of agency ethics program reviews
- Agency compliance with required annual data call
- # of referrals submitted

Strategic Objective 3.2: Use OGE's authorities to address known or potential ethics risks

Strategies:

- Inquire when an agency ethics program appears to OGE to be out of compliance with ethics requirements and take appropriate action.
- Inquire when an agency's employee appears to be out of compliance with ethics requirements and if so, confirm the agency is taking appropriate action.
- Order corrective action on the part of a non-compliant agency and notify the President if non-compliance continues.
- Use transparency to hold agency leaders and ethics programs accountable.

- Timely and consistently apply formal written procedures to determine when OGE conducts inquiries
- Timely and consistently apply formal written procedures to determine when OGE orders an agency to take corrective action
- Agencies' responses to OGE's inquiries, and if needed/recommended, agencies' actions related to inquiries



Strategic Goal IV: Use Transparency to Further Oversight of the Executive Branch

Strategic Objective 4.1: Facilitate public participation and understanding of government ethics

Strategies:

 Make ethics documents publicly available on OGE's website.



- Fulfill requests for publicly available ethics documents.
- Maintain a responsive Freedom of Information Act (FOIA) program.
- Create public-friendly, explanatory content about OGE and the executive branch ethics program.
- Respond timely to external requests for information and assistance.
- Continuously look for opportunities to release additional data sets.

Performance Indicators:

- # ethics documents requested/fulfilled
- # webpage views
- *#* of public inquiries
- # outreach activities conducted
- % of FOIA requests closed within established time frames

STEWARDSHIP OBJECTIVES

Stewardship Objective 5.1: Leverage technology to increase efficiency and effectiveness

Strategies:

- Identify and implement technological solutions, including AI, to address operational challenges and risks.
- Maintain up-to-date secure, reliable, and compliant systems and equipment.
- Evaluate and enhance agency practices and procedures.
- Enhance the functionality of information technology tools, resources, and systems.

- *#* of new or modified applications
- *#* of new or modified standard operating procedures
- *#* of technological solutions implemented and cost/efficiency savings
- $\circ \quad$ % of downtime of network and website

Stewardship Objective 5.2: Safeguard the government resources entrusted to OGE

Strategies:

- Implement sound financial management practices, including an annual, independent audit.
- Pursue efficiencies, such as the economies of scale available through shared services.
- Implement strong internal controls.
- Keep privacy protected information and records secure.
- Comply with the wide array of requirements applicable to federal agencies.
- Train and provide resources to OGE employees to comply with government-wide requirements and mitigate risk.

Performance Indicators:

- % of OGE employees who take required training (i.e., records, security, privacy, ethics)
- Results of independent, annual financial audit
- o Results of Cybersecurity Risk Management Assessment

Stewardship Objective 5.3: Sustain a high performing, cross-functional staff

Strategies:

- Retain and build staff expertise, resiliency, and ability to adapt to new challenges.
- Hold employees accountable, take steps to
- improve poor performance, and recognize and reward individual initiative, skills, performance and hard work by OGE employees.
- Provide employees with opportunities to develop new skills and enhance their existing ones.



- Communicate clearly across the organization and help employees collaborate to effectively achieve OGE's mission.
- Explore staffing models that include leveraging expert detailees to both meet OGE's workload and to develop expertise in the ethics community

- Fulfillment of Employee Development Plans
- % of cross-functional/cross-trained across multiple programs
- # of employees taking training/development courses
- o % of mid-year employee performance reviews conducted