

U.S. Office of Government Ethics  
Strategic Plan  
Fiscal Years 2022–2026

DRAFT

## Part I – OGE’s Mission

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, which is designed to prevent and resolve conflicts of interest. OGE’s mission is part of the very foundation of public service.

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***At its heart, the ethics program stands for the bedrock principle that public service is a public trust.***



## Part II – Organizational Structure

The U.S. Office of Government Ethics (OGE), was established by the Ethics in Government Act of 1978. The Act vests OGE with responsibility for providing “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 in preventing ethical lapses and protecting the impartiality of government decision-making through the implementation and application of the ethics laws and rules ~~Under OGE’s leadership, preventing ethical lapses and protecting the impartiality of government decisionmaking is the day-to-day work of thousands of officials who implement, investigate, and enforce the ethics laws and rules~~ in the more than 140 agencies across the executive branch. OGE uses oversight, rules, advice and counseling, financial disclosure, education, and transparency to enable federal employees at all stages of their service to preserve the public trust. Specifically, the program strives to ensure:

- ~~Incoming Presidential~~ presidential appointees are aware of their ethical obligations and roles in creating an ethical culture in their organizations as they begin government service.
- Public servants at all levels remain free from conflicts of interest, and even the appearance of conflicts of interest, as they carry out the responsibilities the American people have entrusted to them.
- Employees who are seeking to leave the government avoid conflicts of interest and, after they leave government service, do not exercise undue influence over their former agencies on behalf of others.

Above all, the program strives to protect the public’s trust in government. For when efforts at prevention fall short, agencies can 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 will be eroded.

### *Office of Government Ethics: A Small but Agile Agency*

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 to a five-year term by the President. 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. See page 2924 for additional information.

## *OGE and Executive Branch Agencies: A Shared Responsibility*

Maintaining the trust of the citizens we serve 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.

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.

The agency head is 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, including supervisors, human resources officials, and the Inspector General, play a significant role in maintaining the integrity of government programs and operations.

OGE, and the 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; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.<sup>1</sup>



**Figure 1: Institutional Integrity**

<sup>1</sup> [\*See, e.g., 28 U.S.C. §§ 501-599 \(DOJ\); 5 U.S.C. app. §§ 1-13 \(IG Act\); 5 U.S.C. §§ 1101-1105 \(OPM\); 5 U.S.C. §§ 1201-1206 \(MSPB\); 5 U.S.C. §§ 1211-1219 \(OSC\); 5 U.S.C. § 3110 \(Employment of relatives\); 41 U.S.C. § 3301 \(Full and open competition\); 5 U.S.C. § 552 \(Public information\); 31 U.S.C. § 1341 \(Appropriations\).\*](#)

## Part III – Strategic Goals and Objectives

OGE's Strategic Plan (Plan) establishes a framework for OGE to use when developing planned work to carry out its mission over the next five years. OGE's Plan is structured around four strategic goals, twelve strategic objectives, one crosscutting objective, and three stewardship objectives.

OGE's four strategic goals are:

**Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program**

**Strategic Goal 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program~~Mitigate Ethics Vulnerabilities within the Executive Branch~~**

**Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership**

**Strategic Goal 4: Use Transparency to Further Oversight of the Executive Branch**

These goals reflect the broad, long-term outcomes OGE aspires to achieve in order to fulfill its mission of preventing conflicts of interest and its vision of achieving a high level of public confidence in the integrity of executive branch programs and operations.

Twelve strategic objectives and one cross-cutting objective encompass OGE's key activities and describe the strategies OGE will take towards achieving each of the four strategic goals. In addition, three stewardship objectives reflect OGE's management priorities and directly support OGE's accomplishment of its mission.

[Image of Strat Plan]

## Strategic Goal 1: Advance a Strong, Consistent Executive Branch Ethics Program

OGE was created to prevent conflicts of interest on the part of executive branch employees. 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 tax payer funds, and a loss of public confidence in government.

To achieve its strategic goal of advancing a strong, consistent executive branch ethics program, OGE developed four strategic objectives. These objectives are:

- (1.1) Provide expert guidance and support to ethics officials and other stakeholders;
- (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program;
- (1.3) Continuously refine ethics policy and issue interpretive guidance; and
- (1.4) Lead the financial disclosure program and provide the executive branch e-filing system, *Integrity*.

***Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders***

OGE provides expert guidance and support to ethics officials and other stakeholders to promote ~~the~~ consistent interpretation and application of ~~the~~ ethics ~~rules-laws and~~ regulations across the executive branch. Without OGE's expert guidance, agency employees and their leaders are left to guess at consistent solutions to complex ethical dilemmas, and ethics programs would be fragmented and inconsistently implemented.

**Strategies**

- *Supply ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agency's leaders and employees.*
- *Communicate helpful, written guidance that is disseminated widely.*
- *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 actively in U.S. government anti-corruption efforts.*

**Performance Indicators:**

- Percent of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties
- Percent of ethics officials who believe OGE timely communicates ethics-related information
- Number of requests for assistance from ethics officials and the number of requests for technical assistance from other stakeholders

***Strategic Objective 1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program***

OGE seeks to strengthen the expertise of all officials who are integral to carrying out an effective the executive branch ethics program, including ethics officials, agency leaders, Inspectors General, and human resources professionals. Without ~~knowledgeable~~ competent ethics officials, engaged leaders, informed investigators, and collaborative HR officials, the ethics program cannot succeed in implementing a consistent program that helps agencies across the executive branch mitigate risk.

**Strategies**

- *Develop senior ethics officials (DAEOs & ADAEOs) so that they have the skills and knowledge to lead effective ethics programs.*
- *Prepare ethics officials at all levels to train, advise, and support their employees and further their agencies' missions.*
- ~~*Improve the delivery and content of ethics education at agencies, including a focus on equity. Supply ethics officials with resources that help them build an ethical culture within their agencies.*~~
- *Create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies.*
- *Maintain an online learning library for ethics officials at all levels of experience to develop their skills and abilities.*
- *Educate other officials who are integral to the executive branch ethics program.*

**Performance Indicators:**

- ~~○ Percent of ethics officials who believe, after participating in an OGE training event, that they can more effectively perform their job functions~~
- Percent of ethics officials who believe, after using a learning tool provided by OGE, that they can more effectively perform their job functions
- Percent of ethics officials who believe, after participating in an OGE training event, that they can more effectively perform their job functions
- Number of registrants for OGE courses
- Number of online views of OGE's courses and learning tools



***Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance***

Ethics challenges continually evolve. OGE continually adapts by regularly revisiting its rules, refining its policies, considering agency-specific needs, and establishing new processes to ensure the continued consistency and effectiveness of the executive branch ethics program. OGE is responsible for interpreting the statutes and rules that form the building blocks of the executive branch ethics program, including the criminal conflict of interest laws and Standards of Ethical Conduct for Employees of the Executive Branch, and must act to keep pace with evolving challenges to the consistency and strength of the program.

**Strategies**

- *Review, refine, and publish ethics regulations and policies that address new requirements, respond to novel issues, and adapt to changes in the way government accomplishes its mission.*
- *Evaluate and respond to requests from agencies to tailor their ethics programs.*
- *Update and timely maintain the administrative materials (such as forms and records schedules) necessary to support a consistent executive branchwide program.*

**Performance Indicators:**

- Milestones for regulatory revisions
- Percent of ethics officials who believe Legal and Program Advisories help them perform their job duties
- Number of advisories issued

***Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, Integrity***

OGE leads the executive branchwide disclosure systems that serve to prevent conflicts of interest through a systematic review of the financial interests of both current and prospective employees. Without OGE's leadership of this program there would be inconsistent implementation of the confidential and public financial disclosure systems.

**Strategies**

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

**Performance Indicators:**

- Percent of agency administrators satisfied with the support provided by OGE on its electronic public financial disclosure filing system, *Integrity*
- Timely renew approval of ethics forms under the Paperwork Reduction Act
- Satisfaction with public **and confidential** financial disclosure resources
- Percent of downtime of *Integrity*, OGE's network, and website
- Feedback from *Integrity* and website users

## **Strategic Goal 2: ~~Mitigate Ethics Vulnerabilities within the Executive Branch~~Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program**

Today there is a functioning ethics program in each of the more than 140 agencies across the executive branch. As the supervising ethics office of the executive branch, OGE is responsible for conducting oversight to ensure compliance across the more than 130 federal agencies. OGE ~~mitigates ethics vulnerabilities within the executive branch~~holds the executive branch accountable for carrying out an effective ethics program because when an ethics program fails or an individual fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of mitigating ethics vulnerabilities within the executive branch, OGE has developed three strategic objectives. These objectives are:

- (2.1) Monitor agency compliance with executive branch ethics program ~~Requirements~~requirements;
- (2.2) Monitor senior leaders' compliance with individual ethics responsibilities and ~~Commitments~~commitments; and
- (2.3) Use OGE's authorities to address known or potential ethics risks

***Strategic Objective 2.1: Monitor agency compliance with executive branch ethics program requirements***

The executive branch ethics program is decentralized and its success relies on each agency implementing the ethics program requirements established by OGE. OGE regularly conducts oversight of agency compliance with these requirement in order to mitigate ethics program vulnerabilities at each agency and to identify executive branchwide trends. Without this oversight, systemic problems may multiply and result in ethics program failures.

**Strategies**

- *Identify program weaknesses ~~and (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.*

**Performance Indicators:**

- Percent of cases in which a program weakness identified during an OGE program review results in improvements in the agency's ethics program
- Percent of agency ethics programs reviewed within established time frames
- Publication of responses to Annual Agency Ethics Program Questionnaire

## ***Strategic Objective 2.2: Monitor senior leaders' compliance with individual ethics commitments***

Executive branch employees must endeavor to act at all times in the public's interest. They must avoid losing impartiality or appearing to lose impartiality in carrying out their official duties and comply with the requirements of government ethics laws and regulations. OGE monitors senior leaders' compliance with their individual ethics commitments to confirm that they keep the promises they made when entering government and continue to serve impartially throughout their service as a government employee. If OGE does not monitor senior leaders' compliance with their individual ethics commitments, the public cannot be certain that government leaders are acting in their interest.

### **Strategies**

- *Collect and publish documentation of senior agency leaders' compliance with their individual ethics commitments.*
- *Conduct expert, second-level reviews of senior agency leaders' periodic and annual financial disclosure reports.*
- ~~• *Collect and publish documentation of senior agency leaders' compliance with their individual ethics commitments.*~~
- *Analyze, respond to requests for Certificates of Divestiture and make available to the public those approved/issued by OGE.*
- *Consult with agencies on waivers to the primary criminal conflict of interest law, 18 U.S.C. § 208, for their employees.*

### **Performance Indicators:**

- Percent of officials who comply with their ethics agreements
- Percent of public financial disclosure reports required to be submitted to OGE for second-level review that are closed within established time frames

### ***Strategic Objective 2.3: Use OGE's authorities to address known or potential ethics risks***

Although limited by statute<sup>2</sup>, OGE uses its authorities and oversight role to address known or potential ethics risks that come to its attention. Without OGE's inquiry and intervention, ethics vulnerabilities may go unaddressed, undermining public confidence and impairing the operations of the executive branch.

#### **Strategies**

- *Inquire and potentially intervene if an agency ethics program appears to be out of compliance with ethics requirements.*
- *Inquire and hold the employing agency accountable for action when one of its employees appears to be out of compliance with ethics requirements.*
- *Use transparency to hold agency leaders and ethics programs accountable.*
- *Order corrective action on the part of a non-compliant agency and notify the President if non-compliance continues.*

#### **Performance Indicators:**

- In cases in which OGE identifies a program weakness, OGE's program review results in improvements in the agency's ethics program.

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<sup>2</sup> The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rest with the management of the employing agency, the relevant inspector general's office, or in the case of alleged crimes, the Justice Department. See 5 U.S.C. app. § 402. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an appointee's compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE's only recourse would be to notify the President. See 5 U.S.C. app. § 402(f)(2)(A).

### **Strategic Goal 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership**

OGE has a vital role in supporting the President's constitutional duty to nominate and appoint officers to the executive branch. OGE helps top executive branch officials resolve conflicts and demonstrate ethical leadership. Ethical culture begins with demonstrated ethical leadership throughout an organization.

To achieve its strategic goal of helping top executive branch officials resolve conflicts of interest and demonstrate ethical leadership, OGE has developed three strategic objectives. These strategic objective are:

- (3.1) Carry out OGE's statutory role in preparing for and supporting Presidential transitions;
- (3.2) Assist the President and the Senate in the Presidential appointment process; and
- (3.3) Foster ethical leadership in senior officials.

***Strategic Objective 3.1: Carry out OGE's statutory role in preparing for and supporting Presidential transitions***

OGE has a unique and important statutory role in supporting Presidential transitions. Therefore, OGE actively prepares the agency and the executive branchwide program in advance of each Presidential election to be ready to carry out its important Presidential appointments work. Failing to effectively prepare to assist the President and the Senate in the Presidential appointments process can result in critical senior leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk.

**Strategies**

- *Use decades of expertise and apply lessons learned from previous Presidential transitions to improve program efficiency and effectiveness.*
- *Support and hold accountable agency ethics officials in preparing for a potential Presidential transition.*
- *Develop and share key Presidential transition resources for a range of audiences.*
- *Engage and actively participate on government-wide transition councils.*
- *Train and support Presidential campaigns, the Presidential Transition Team, and the elected Administration.*

**Performance Indicators:**

- Engage and coordinate with agencies and organizations focused on preparing for and executing a smooth Presidential transition
- Timely update key transition-related resources
- Provide internal and external training on financial disclosure



***Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointment process***

Whenever the government's top leadership positions are vacant, the nation is vulnerable in its ability to respond to potential ~~manmade~~human-caused, natural, ~~cyber~~, or economic disasters. Therefore, OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process.

**Strategies**

- *Conduct expert, second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions.*
- *Resolve potential conflicts of interest of incoming senior leaders.*
- *Work with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act.*

**Performance Indicators:**

- Initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments are provided to the agency within established time frames
- Final financial disclosure reports of Presidential nominees for Senate-confirmed appointments are certified by OGE within established time frames

### ***Strategic Objective 3.3: Foster ethical leadership in senior officials***

Ethical leadership and building an ethical culture are necessary components of the executive branch ethics program because organizational culture is one of the strongest drivers of employees' behavior. Therefore, OGE continually seeks opportunities to engage agency-senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities.

#### **Strategies**

- *Communicate directly with ~~senior~~agency leaders ~~heads~~ regarding their unique responsibilities under the ethics regulations to encourage their support of the ethics program.*
- *~~Uphold~~Maintain specific regulatory ethics standards for senior leaders~~leaders and managers~~*
- *Convey the importance of and techniques for leading ethical organizations to senior leaders.*
- *~~Train~~Educate senior leaders~~leaders and managers~~ on their personal and programmatic ethics obligations.*

#### **Performance Indicators:**

- Federal Employee Viewpoint Survey scores
- Number of meetings held with Senior Leaders
- Number of trainings conducted
- Number of messages sent

## **Strategic Goal 4: Use Transparency to Further the Oversight of the Executive Branch**

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility by making ethics documents available and helping to make the American people aware that there are systems in place and mechanisms available to hold their government accountable. Without this transparency, the public, could not as meaningfully oversee the integrity of its government.

To achieve its strategic goal of using transparency to further oversight of the executive branch, OGE has developed two strategic objectives:

- (4.1) Make ethics information publicly available; and
- (4.2) Reach a broader array of stakeholders.

### ***Strategic Objective 4.1: Make ethics information publicly available***

OGE makes a wide array of ethics information publicly available to help the American public hold senior leaders accountable for making decisions that are based on the interests of the public rather than their own personal financial interests. If the public does not have the information it needs to ensure that government officials are free from conflicts of interest, their trust in government may erode, and they may become convinced that those officials are prioritizing private interests over the nation's interests.

#### **Strategies**

- *Provide timely access to ethics information.*
- *Make ethics information ~~findable~~ easy to locate and understandable.*
  - *Create public friendly, explanatory content about ethics.*
- *Respond to requests for publicly available ethics materials.*
- *Maintain a responsive Freedom of Information Act program.*
- *Analyze available data to assess public interest in ethics information and evaluate the need for additional transparency.*

#### **Performance Indicators:**

- Percent of ethics documents made available within established time frames
- Stakeholder feedback on the clarity of how to access and use ethics materials
- Number of ethics documents requested and released ~~requested~~

### ***Strategic Objective 4.2: Reach a broader array of stakeholders***

OGE seeks to reach a broader array of stakeholders to raise awareness of the systems and processes in place to detect and resolve conflicts of interest. -Without accurate information the public cannot make informed judgments about the integrity of their government. When the public feel that information is being withheld, they may become suspicious, and their confidence in the executive branch may erode.

#### **Strategies**

- *Seek new opportunities to educate a variety of stakeholders.*
- *Create communications that are accurate, compelling, relevant, and tailored to each target audience.*
- *Deliver content through effective communication channels.*
- *Respond timely to external requests for information and assistance.*
- *Participate and collaborate with ethics practitioners across various segments of society.*

#### **Performance Indicators:**

- OGE's Twitter engagement rate
- Number of page views and unique visitors to OGE's website
- Number of outreach activities
- Number of requests for assistance
- Feedback from website users

## Crosscutting Objectives

**Crosscutting Objective 5.1:** Advance equity in OGE's programs and improve diversity, equity, inclusion, and accessibility in OGE's operations

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. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our government. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

### Strategies

- ~~Identify~~ Assess for inequities in ethics policies and programs that may serve as barriers to ~~equal opportunity~~ full participation.
- Reform ethics policies and programs identified as barriers to ~~equal~~ equitable opportunity.
- ~~Review and modify, as needed, OGE's hiring processes.~~
- Evaluate and alter, as needed, OGE's procurement processes.
- Assess and alter, as needed, OGE's external communications.
- Adopt new approaches to stakeholder engagement.
- Review and modify, as needed, OGE's employment practices.

### Performance Indicators:

- Completion of an equity assessment in each of the areas OGE is evaluating
- ~~Number of new/updated standard operating procedures and policies addressing barriers~~
- Number of webpages and communications reviewed and updated to remove barriers
- Number of Diversity, Equity, Inclusion, and Accessibility promising practices implemented

## Stewardship Objectives

To effectively lead in ethics, OGE must be a strong, well-run agency in order to carry out its critical mission of preventing conflicts of interests in the executive branch. Therefore, OGE endeavors to be a model agency with regard to its workforce, technology, and compliance. The agency invests in the development, diversity, and retention of its most valuable asset: its staff. OGE invests in its employees work tirelessly to carry out the day-to-day work to accomplish the agency's vital mission. The agency leverages technology to amplify its impact by increasing the reach of its limited resources. The OGE also strives to maximize every taxpayer dollar entrusted to the agency and to remain compliant with the wide array of requirements applicable to federal agencies.

In support of its mission and strategic goals, OGE has developed three stewardship objectives:

- (6.1) Sustain a high-performing, cross-functional staff;
- (6.2) Leverage technology to increase efficiency and effectiveness; and
- (6.3) Safeguard the government resources entrusted to OGE.

### ***Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff***

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. Continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities.

#### **Strategies**

- *Retain and build staff expertise, resiliency, and ability to adapt to new challenges*
- *Recognize and reward outstanding performance by OGE employees and take steps to improve poor performance.*
- *Promote diversity and inclusion.*
- *Invest in the professional development of OGE staff at all levels.*
- *Communicate clearly across the organization and help employees collaborate to effectively achieve OGE's mission.*

#### **Performance Indicators:**

- OGE's score on the Employee Engagement Index on the Federal Employee Viewpoint Survey
- Fulfillment of Employee Development Plans
- Implemented employee recognitions programs



***Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness***

OGE leverages technology to increase its efficiency and effectiveness in all aspects of its work. Without strong, secure information systems and processes, the agency cannot carry out its executive branchwide mandates, operate effectively, or efficiently perform its mission-critical activities.

**Strategies**

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

**Performance Indicators:**

- Number of new or modified applications
- Number of new or modified standard operating procedures
- Technological solutions implemented

### ***Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE***

In addition to its mission work, OGE brings to life the principle that “public service is a public trust” in the ways that it conducts its agency operations. OGE is a compliance organization that takes seriously its compliance with government-wide directives and their important policy objectives. Therefore, OGE carefully safeguards the governments resources entrusted to the agency.

#### **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.*
- *Maintain a strong, secure information technology infrastructure.*
- *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:**

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

## Part IV – External Factors

OGE's Strategic Plan assumes adequate levels of fiscal and human resources. From experience, OGE knows that the agency will face certain external factors and, to the extent possible, has factored those into this Plan. For example, prior to and immediately after a Presidential election, regardless of the outcome, OGE experiences a particularly large and varied workload, requiring it to shift resources to support the Administration in the Senate confirmation process. OGE must balance its vital role in ensuring that Presidential nominees for civilian positions requiring Senate confirmation are free of conflicts of interest with its mission-critical work that is not directly related to a transition.

OGE is the subject of significant and intense congressional and stakeholder interest. OGE is currently tracking more than 50 bills that would make significant statutory revisions to the Ethics in Government Act and the criminal conflict of interest statutes, or create new ethics-related statutes. Passage of major reform would present significant challenges for OGE.

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 ethics issues that require regulatory solutions.

OGE's Strategic Plan assumes adequate levels of fiscal and human resources. From experience, OGE knows that the agency will face certain external factors and, to the extent possible, has factored those into this Plan. The following external factors could cause OGE to incur costs, impede our mission, or necessitate reallocating staffing resources.

- Nominee Workload: Based on prior experience prior to and for two years after the election of a new President, OGE experiences more than a doubling of its workload for reviewing financial disclosure reports of nominees requiring Senate confirmation. The rate of confirmations by the Senate may also increase OGE's workload, if nominations are returned and must be re-reviewed, certified, and transmitted to the Senate because they have remained unconfirmed for an extended period.
- IT Threats: With a dispersed, virtual 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 must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated.
- Potential disruption and cost of relocation under a new lease: GSA's current lease for OGE's space ends February 2024. OGE is working with GSA to review its current space needs and will work with them on the negotiation of a new lease. Depending

on the outcome of the lease negotiations, OGE could incur millions in additional costs and its work could be disrupted by being forced to relocate its staff.

- *Integrity:* OGE is responsible for the security and operational stability of *Integrity*, a system vital to the Presidential appointments process, senior leaders, and the executive branchwide ethics program. Although, OGE actively manages risks, there are unanticipated critical failures that can occur to an IT system of its size. Therefore, OGE may need to divert resources to address those issues as they arise.
- Potential Legislative Reform: OGE is the subject of significant and intense congressional and stakeholder interest. OGE is currently tracking more than 100 bills that would make significant statutory revisions to the Ethics in Government Act or the criminal conflict of interest statutes, or create entirely new ethics-related statutes. Passage of major ethics reform would present significant challenges for OGE.
- Future of Work: OGE continues to prioritize employee health and safety, evaluate its personnel policies and work environments, and pilot new operating approaches and workplace innovations, while carefully considering trends related to the federal workplace.
- 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 from such inter-agency mandates and government wide initiatives have impacts across programs.

## Part V – Evidence Building

OGE has long understood the importance of using evidence and evaluation to measure the effectiveness of both the executive branch ethics program and OGE's mission activities in support of the executive branch ethics program. Historically, OGE has gathered evidence through direct feedback from executive branch agency ethics officials and stakeholders in written and verbal form, including:

- Conducting reviews of agency ethics programs;
- Surveying ethics officials annually to assess their satisfaction with OGE's guidance, training, and overall efforts;
- Surveying employees through the Merit Systems Protection Board employee surveys to assess their understanding of the executive branch ethics rules;
- Collecting information annually from each agency about their ethics program to gain insight into their operations;
- Collecting written evaluations from participants after OGE's training events to ensure that training is effective and useful;
- Conducting research on academic practices related to managing ethics programs;
- Analyzing requests for assistance from agency ethics officials and the public to identify trends;
- Utilizing metrics gathered from OGE's website to gauge public interest; and
- Assessing responses by OGE employees to OPM's Employee Viewpoint Survey to measure employee engagement, among other things.

OGE consistently looks for opportunities through its mission activities to gather valuable information and evaluate the effectiveness of its programs. OGE prioritizes work by continuously analyzing data sources and conducting outreach to the ethics community and other external stakeholders. OGE's Data Governance Board (DGB) provides executive leadership and oversight for the development and implementation of the policies and processes which govern the collection or creation, management, use, and disclosure of OGE data. This approach ensures that OGE allocates its resources according to areas with the greatest demand, such as the need for additional guidance, support, education, oversight, or outreach.

## APPENDIX I -Organizational Structure



Figure XX: OGE Organizational Chart

### 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 by the President and is confirmed by the Senate to a five-year term. The Director is a member of the Council of the Inspectors General for Integrity and Efficiency (CIGIE) and the Integrity Committee of the CIGIE, which reviews allegations of misconduct against Inspectors General. The Director also serves as a member of the Administrative Conference of the United States.

### PROGRAM COUNSEL DIVISION

The Program Counsel Division (PCD) is responsible for (1) coordinating and conducting outreach between OGE and its many stakeholders, such as Congress, OMB, government watchdog groups, and the public; (2) developing and providing training to agency ethics officials; (3) carrying out initiatives that reach across executive branch agencies, such as e-filing; (4) providing agency-specific legal support to OGE; (5) managing OGE's budget, performance, and legislative

affairs programs; and (6) supporting agency ethics officials, through its Desk Officer program, in carrying out the executive branch ethics program.

The Legal, External Affairs, and Performance Branch (LEAP) provides agency-specific legal support to OGE. LEAP manages OGE's strategic initiatives, including e-filing, performance management, budget, communications, and legislative affairs programs. LEAP serves as OGE's liaison to the Federal Register and the Office of Information and Regulatory Affairs within the Office of Management and Budget, and oversees OGE's Freedom of Information Act, Privacy Act, and Records Management programs.

The Agency Assistance Branch (AAB) provides vital services and support to agency ethics officials throughout the executive branch. Through its Desk Officer program, AAB provides timely and accurate advice to ethics officials in response to questions regarding unique or emerging ethics-related issues. In addition to responding to requests for advice, AAB Desk Officers actively reach out to the ethics community to address issues and challenges that are of common interest, in order to arrive at and share collaborative solutions.

AAB, through the Institute for Ethics in Government, also develops and provides substantive training to agency ethics officials and OGE staff to help them attain the knowledge and skills necessary to carry out the duties of their position.

### GENERAL COUNSEL & LEGAL POLICY DIVISION

The General Counsel and Legal Policy Division (GCLPD) is responsible for (1)

establishing and maintaining a legal framework for the executive branch ethics program, (2) providing assistance to the President and Senate in the Presidential appointment process; and (3) managing the incumbent public financial disclosure program.

The Ethics Law and Policy Branch (ELPB) develops, drafts, and issues all executive branch ethics regulations. ELPB also reviews agency-specific regulations supplementing executive branch ethical standards. When appropriate, ELPB drafts recommendations for changes in the conflicts of interest and ethics statutes. ELPB sets forth executive branchwide policy and interpretive guidance of the executive branch ethics laws and regulations. ELPB also publishes written guidance in the form of Legal Advisories to promote consistent interpretation and application of the ethics laws, regulations, and policy guidance across the entire executive branch.

The Presidential Nominations Branch (PNB) works closely with the White House and agency ethics officials to help prospective Presidential nominees to Senate-confirmed positions comply with the extensive financial disclosure requirements of the Ethics in Government Act. PNB carefully evaluates the nominee's financial disclosure report and works with the agency ethics official to prepare an individualized ethics agreement to avoid and resolve potential conflicts of interest before the nominee enters government service. PNB also reviews the financial disclosure reports of the most senior White House staff members.

The Incumbent Financial Disclosure Branch (IFDB) ensures that executive

branch leaders who have been appointed by the President and confirmed by the Senate, as well as Designated Agency Ethics Officials, remain free of conflicts of interest after they take office by collecting and analyzing their annual, termination, and periodic transaction public financial disclosure reports. IFDB reviews each report to ensure completeness and to resolve potential conflicts of interest. IFDB posts these reports to OGE's website.

## **COMPLIANCE DIVISION**

The Compliance Division (CD) 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) managing elements of the public financial disclosure program; and (3) supporting OGE's administrative operations.

The Program Review Branch (PRB) exercises oversight of the executive branch ethics program through ethics program reviews. Ethics program reviews are designed to ensure consistent and sustainable ethics program compliance with established executive branch ethics laws, regulations, and policies, and to provide recommendations for meaningful program improvement. To learn more about ethics program reviews, see Ethics Program Reviews.

PRB also monitors compliance with ethics agreements made by Presidential Appointees during their Senate confirmation process to ensure commitments made to resolve potential conflicts of interests are timely met and appropriately resolved.



Additionally, PRB is responsible for reviewing agency requests to institute alternative financial disclosure procedures and exempt Schedule C employees from public financial disclosure requirements.

The Administrative Operations Branch (AOB) is responsible for providing overall administrative and legal compliance support to OGE. AOB is responsible for (1) ensuring compliance with administrative requirements for agencies; (2) overseeing human resources functions; (3) purchasing and contracting; and (4) property management and other administrative programs. The Deputy Director for Compliance 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.

## **INFORMATION TECHNOLOGY DIVISION**

The Information Technology Division is responsible for providing the cost-effective information technology infrastructure and services necessary to support the agency's mission while implementing appropriate security controls to protect the confidentiality, integrity, and availability of the agency's data and information systems.



## APPENDIX II - Definition of Strategic Planning Terms

<b>Mission Statement</b>
A brief, easy-to understand narrative, usually no more than a sentence long. It defines the basic purpose of the agency and is consistent with the agency's core programs and activities expressed within the broad context of national problems, needs, or challenges.
<b>Strategic Goals</b>
Statements that articulate general long-term outcomes that an agency hopes to achieve for the major functions and operations of the agency. They should address the broader impact desired by the organization.
<b>Strategic Objectives</b>
Statements that reflect the specific impact the agency aims to achieve under a certain goal. Objectives are tied to a set of performance goals and indicators established to help the agency monitor and understand progress.
<b><u>Crosscutting Objectives</u></b>
<u>A type of strategic objective that is not directly tied to a single strategic goal, but may be tied to several or none. In some circumstances agencies perform statutory or crosscutting activities which are not closely tied to a single strategic goal.</u>
<b><u>Stewardship Objectives</u></b>
<u>Statements that communicate improvement priorities for management functions such as strategic human capital management, information technology, sustainability or financial stewardship.</u>
<b>Strategies</b>
Statements that describe the approaches or practices an agency plans to employ to make progress on strategic objectives.
<b>Indicators</b>
Broad-based metrics that show whether desired outcomes are trending in the desired direction.
<b>Measures</b>
Metrics that help determine the impact or influence activities have on outcomes. Specific targets are associated with them. They can be quantitative or qualitative in nature.

<b>External Factors</b>
Situations and circumstances (environments) that can influence program results and outcomes, not within the control of the agency.
<b>External Partners</b>
Foreign and domestic governments and private agencies, organizations, or entities that contribute to the achievement of an agency objective.

### **APPENDIX III: Summary of Consultation Efforts**

To develop the Strategic Plan (Plan), OGE utilized a participatory and inclusive process to develop the Plan that included input from a wide array of key stakeholders. The agency conducted focus groups with staff and senior leadership to develop the goals, objectives, and strategies in the Plan. The agency also sought feedback from the Congress, executive branch ethics officials, federal employee affinity groups, the American public, and Government watchdog groups. A preliminary draft of the Plan was posted on OGE's public website, posted to Twitter and issued a Federal Register notice was issued. Lastly, OGE also held a listening session open to the public. The current Plan reflects feedback provided to OGE by these external stakeholders.