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I write this comment to urge OGE to withdraw this rule. While OGE's decisive action to support the President's initiative is commendable, I believe OGE has ignored the primary fundamental issue and because of that has created a situation which is likely to perpetuate the very harm that the Executive Order attempted to remedy.

Before that, I commend OGE on its attempt to save money and be good stewards of taxpayer money. However, I also urge OGE to set aside this aspect of the background. OGE's mission is to ensure the integrity of the government. And that must be the only consideration. I acknowledge the financial costs may be high and require innovative solutions from OGE. However, this rule fundamentally erodes OGE's mission in protecting the integrity of the government; the cost should not be a reason to set aside OGE's fundamental mission.

I start with the Executive Order. The Executive Order was created to remedy a fundamental issue in the government, that the bureaucracy was unresponsive to the needs of the President of the United States. Despite all the safeguards created by Congress, and a significant number of political appointments, the bureaucracy of the United States was for some reason or another not commandable by the President of the United States.

I do not wish to cast that everybody in every position mentioned by the Executive Order was actively working against the wishes of the President. However, enough people in these positions were judged by the President to be unresponsive and in need of a more flexible schedule. Indeed, given the numbers and individualized reasons that may have contributed, it could be a variety of issues, from misconduct, poor performance, political distaste, and perhaps even financial interests.

It is this final possible reason that makes OGE's rule ill-considered. OGE has assumed that because these people were not required to file Confidential Financial Disclosures (OGE 450s), there is no reason to have them file the Public Financial Disclosures (OGE 278s). This is overly simplified.

The people in these positions were not acting in the President's interest, for some reason or another. This situation devolved to the point that the President was forced to correct the issue by nothing less than an Executive Order to vastly overhaul the civil service. To put it even more bluntly, every existing failsafe failed, including OGE's Confidential Financial Disclosures (OGE 450s), until the President was forced into action.

The Confidential Financial Disclosures (OGE 450s) system has weak points that let this happen. First, the positions required to file Confidential Financial Disclosures (OGE 450s), are determined by each agency's DAEO. Second, Confidential Financial Disclosures (OGE 450s)

are handled entirely within an agency, with no OGE or public review.

Public Financial Disclosures (OGE 278s) are likely to reveal and help investigate how this situation arose. Given the number of people involved, it is almost inevitable (sadly) that some portion of the people holding these positions were unresponsive to the President's and federal government's needs due to some conflicts of interest, misuses of position, and other improprieties. Furthermore, given the importance of and the current issues in these positions, as detailed by the Executive Order, it is incredibly shortsighted to say that the public confidence in the integrity of the Government has not already been questioned.

In conclusion, I emphasize again that the President himself was forced to take action and create a radically new solution by Executive Order to solve an issue with the bureaucracy which for some reason or another was unresponsive to the mandate to which he was elected to by the people of the United States. It is critical that light be shined on why, and the public's trust in these positions--that the bureaucrats holding these positions are acting according to the wishes of the person elected by the public--be restored. For this reason, I urge OGE to withdraw this rule.