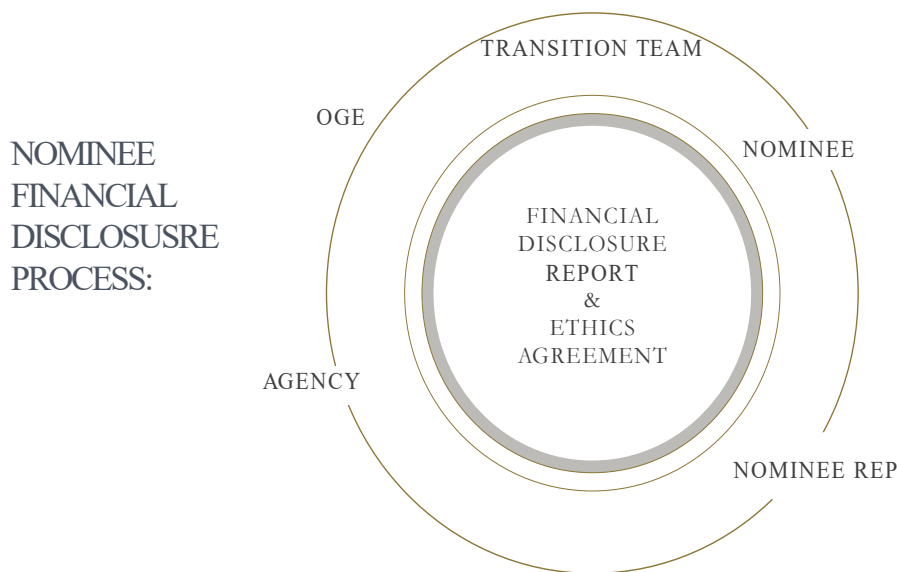


WAYS OGE CAN HELP

- Briefings before and after the election
- Training on Integrity (e-filing system)
- Review of financial disclosure reports
- Consultations on prospective nominees
- Technical assistance with ethics initiatives
- Training and guidance on government ethics



TIMELINE



PROCESS

- Provide Nominee Ethics Guide to nominee
- Initiate financial disclosure report in *Integrity*
- Release report to OGE and the agency
- OGE/agency work on report with nominee (multiple rounds over several weeks)
- OGE/agency draft ethics agreement
- OGE “preclears” report
- Public intent to nominate
- Senate holds hearings before Inauguration

ADDRESSING RISK FACTORS

• Risk: Too little time

Send OGE as many reports as possible in November and early December

• Risk: Slow responses from nominees

Emphasize the importance of responding promptly to questions about their reports

• Risk: Nominees’ resistance to resolving conflicts of interest

Advise nominees early in the process that they and their spouses may be required to divest assets

• Risk: Confidentiality concerns shorten timeframe for reviewing certain reports

Integrity is a secure system with limited access and role-based permissions

• Risk: Issues arising from the complexity of ethics rules and the nominee process

Detail an agency ethics official or hire an outside financial disclosure expert