

2005 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY REPORT

NOTE: The following statistics were gathered from responses to the 2005 Ethics Program Questionnaire. The numbers in *parentheses* are 2004 statistics.

Part 1. Organization/Resources

Number of agencies responding to questionnaire: **138** (126)

Number of full time agency employees: **4,514,407** (5,428,117)

Number of Special Government Employees (SGE): **10,851** (7,801)

Number of IPAs (Intergovernmental Personnel Act): **3,333** (3,288)

Identify the length of time the DAEO has held the position:

- 10 or more years **45** (36)
- 5 – 9 years **28** (20)
- 1 – 4 years **41** (44)
- Less than 1 year **19** (22)
- Position Vacant **5** (4)

Identify the length of time the ADAEO has held the position:

- 10 or more years **24** (22)
- 5 – 9 years **23** (23)
- 1 – 4 years **51** (43)
- Less than 1 year **27** (28)
- Position Vacant **13** (10)

Do you have designated Deputy DAEO(s)?

YES **52** (42) NO **86** (84)

Does your agency have regional or field office ethics officials?

YES **41** (37) NO **97** (89)

Number of ethics officials who worked in the ethics program in 2005: **6,124** (6,452)
(include employees who worked in the region or field offices)

Is the ethics program a separate budgeted item?

YES **5** (5) NO **133** (121)

Number of ethics officials who worked full time on ethics: **456** (416)

Number of ethics officials who worked part time on ethics: 5,668 (6,036)

Number of regional and field office ethics officials: 4,772 (4,933)

Part 2. Program Administration

The following are elements of the ethics program that have been ranked from one (1) being the most time spent to administer to eight (8) being the least time spent to administer.

Public financial disclosure system:	<u>3</u> (3)
Confidential financial disclosure system:	<u>1</u> (2)
Outside activity approval system:	<u>6</u> (6)
Written opinions and counseling:	<u>2</u> (1)
Education and training:	<u>4</u> (4)
Disciplinary process for violations:	<u>7</u> (8)
Special Government employee's activities:	<u>8</u> (5)
Developing information technology applications for any aspect of the ethics program	<u>5</u> (7)

Please indicate which ethics program area(s) your agency contracted out in 2005:

- Initial ethics orientation 2 (2)
- Annual ethics training 4 (6)
- Financial disclosure review 4 (5)
- Internal ethics program review 1 (0)
- Advice and counseling 1 (2)
- Program administration (tracking systems, databases etc.) 6 (4)
- Other 5 (3)
- None 123 (112)

Did your agency perform an internal ethics program review (self evaluation, IG review, etc.) in 2005?

YES 43 (45) NO 95 (81)

What organization within your agency conducted the review?

- Agency Ethics Official(s) 30 (29)
- Inspector General's Office 6 (7)
- General Counsel's Office 13 (17)
- Other 8 (5)

Were you provided feedback from the review?

- YES, Written 15 (10)
- YES, Verbal 22 (23)
- NO feedback provided 6 (12)

Part 3. Education and Training

Number of employees required to receive initial ethics orientation: **210,527** (186,513)

Number of employees who received initial ethics orientation: **202,446** (182,460)

Total number of employees who received annual ethics training: **949,970** (854,610)

Number of employees required to receive annual ethics training: **1,173,682** (360,793)

How do you ensure that your required employees receive annual ethics training?

- Attendance Rosters **106** (88)
- Training Management System **52** (40)
- Training Evaluations **14** (20)
- Other **79** (73)

Identify the topical areas in which training was provided:

- Fourteen Principals of Ethical Conduct **99** (85)
- Gifts **126** (103)
- Impartiality **92** (83)
- Misuse of Position **115** (94)
- Outside and Representational Activities **92** (78)
- Conflicting Financial Interests **115** (103)
- Post Employment **92** (89)
- Seeking Employment **86** (87)
- Hatch Act **76** (78)
- Other **46** (48)

What kinds of training methods and materials did you use for your training?

- Written Materials **118** (104)
- Videos **56** (53)
- Satellite/Videoconferencing **20** (18)
- Classroom Instruction **86** (73)
- Individual Briefings **91** (83)
- Computer/Web-based Training **90** (77)
- Other **35** (35)

What kinds of written materials did you use for your training?

- Copies of the Standards of Conduct and/or agency supplemental regulations **90** (76)
- Summaries of the Standards of Conduct **77** (71)
- Pamphlets/Brochures **73** (75)
- Newsletters **28** (25)
- Self-study manual **20** (24)
- Hypothetical case studies **55** (46)

What kinds of videos did you use for your training?

- OGE Produced 43 (41)
- Agency Produced 21 (23)

Part 4. Ethics Opinions, Advice and Counseling

The following are topics of the ethics program that have been ranked from one (1) being the most frequent type of advice rendered to ten (10) being the least frequent type of advice rendered.

Outside employment/activities	<u>6</u> (5)
Post-employment restrictions	<u>4</u> (2)
Conflicting financial interests	<u>3</u> (3)
Awards	<u>1</u> (8)
Impartiality in performance of official duties	<u>7</u> (6)
Misuse of position, Government resources and information	<u>8</u> (7)
Travel, subsistence, and related expenses from non-Federal sources	<u>5</u> (4)
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	<u>2</u> (1)

Who is authorized to provide written advice on standards of conduct and conflict of interest statutes? If the DAEO is the General Counsel, please mark DAEO.

- DAEO/Alternate DAEO/Deputies/Ethics Officials 133 (122)
- General Counsel/Staff Attorneys 49 (40)
- Regional Counsels 21 (19)
- Supervisors 3 (3)
- Directors of Personnel/Staff 5 (4)
- Agency Head 8 (7)
- Other 13 (6)

How does your ethics office ensure that accurate opinions, advice and counsel are provided to employees?

- Review all written opinions 75 (73)
- Discuss verbal opinions prior to providing them to employees 97 (88)
- Review written opinions randomly 27 (25)
- Review ethics officials' phone logs 4 (7)
- Conduct periodic discussions with staff 69 (62)
- Offer training 47 (43)
- Other 47 (40)

Part 5. Enforcement of Standards of Ethical Conduct, Criminal and Civil Statutes

Number of disciplinary actions taken in 2005 based wholly or in part upon violations of the standards of ethical conduct provisions (5 C.F.R. part 2635) or the conflict of interest statutes in Title 18 of the United States Code: 3,424 (3,184)

Report the number of disciplinary actions taken based wholly or in part upon *violations of the criminal conflict of interest statutes*, 18 U.S.C. §§ 203, 205, 207, 208, and 209. For purposes of this question,

disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: 30 (41)

Report the number of referrals of potential violations of the criminal conflict of interest statutes: 104

Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes, 18 U.S.C. 203, 205, 207, 208, and 209, to the Department of Justice (DOJ), including offices of U.S. Attorneys?

- DAEO (Ethics Officials) 69 (70)
- Agency Head 15 (18)
- IG 65 (54)
- General Counsel 41 (34)
- Other 20 (11)

Which office(s) are responsible for notifying OGE when a referral of a potential violation of the criminal conflict of interest statutes have been made to the Department of Justice, including the U.S. Attorneys?

- DAEO (Ethics Officials) 93 (90)
- Agency Head 8 (7)
- IG 44 (36)
- General Counsel 36 (26)
- Other 7 (5)

Part 6. Public Financial Disclosure

Number of public financial disclosure reports (SF 278):

	Nominee/ New Entrant		Annual		Termination		Combination		Total	
	Req	Filed	Req	Filed	Req	Filed	Req	Filed	Req	Filed
PAS	<u>269</u>	<u>268</u>	<u>640</u>	<u>639</u>	<u>148</u>	<u>146</u>	<u>39</u>	<u>39</u>	<u>1096</u>	<u>1092</u>
Non-Career SES	<u>301</u>	<u>293</u>	<u>1395</u>	<u>1393</u>	<u>225</u>	<u>218</u>	<u>92</u>	<u>92</u>	<u>2013</u>	<u>1996</u>
Career SES	<u>1,237</u>	<u>1,213</u>	<u>8,882</u>	<u>8,828</u>	<u>895</u>	<u>843</u>	<u>231</u>	<u>228</u>	<u>11,245</u>	<u>11,112</u>
Schedule C	<u>633</u>	<u>617</u>	<u>1,261</u>	<u>1,251</u>	<u>328</u>	<u>293</u>	<u>73</u>	<u>73</u>	<u>2,295</u>	<u>2,234</u>
Other	<u>1,147</u>	<u>1,122</u>	<u>6,872</u>	<u>6,766</u>	<u>594</u>	<u>574</u>	<u>161</u>	<u>158</u>	<u>8,774</u>	<u>8,620</u>
Total	<u>3,587</u> (3,580)	<u>3,513</u> (3,498)	<u>19,050</u> (18,293)	<u>18,877</u> (18,204)	<u>2,190</u> (1,707)	<u>2,074</u> (1,588)	<u>596</u> (442)	<u>590</u> (435)	<u>25,423</u> (24,022)	<u>25,054</u> (23,725)

Does your agency require an intermediate review by someone other than an ethics official of all SF 278s?
YES 28 (28) NO 110 (98)

Number of Schedule C employees exempted from the filing requirement by OGE? 111 (118)

Number of filers who requested filing extensions? **3,158** (2,940)

Number of filers who were granted filing extensions? **3,152** (2,934)

Number of filers who requested waivers of the late filing fee? **223** (257)

Number of filers who were granted waivers of the late filing fee? **200** (211)

Number of filers who paid the late filing fee? **40** (47)

Number of requests your agency received for public release of SF 278s? **140** (140)

Number of individual SF 278 reports requested to be released? **140** (895)

Number of PAS SF 278 reports requested? **474** (376)

Number of non-career SES SF 278 reports requested? **97** (75)

Number of career SES SF 278 reports requested? **204** (348)

Number of public financial disclosures filers who took specific corrective or remedial (nondisciplinary) actions in 2005: **515** (778)

Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure filers: **51** (59)

Part 7. Confidential Financial Disclosure

Required OGE form 450s: **285,130** (281,539)

Filed OGE form 450s: **220,513** (260,694)

Filed Alternative OGE 450As: **48,454** (2,756)

Alternative OGE approved form: **12,803** (12,518)

Does your agency require an intermediate review by someone other than an ethics official of all OGE form 450s?

YES **33** (31) NO **105** (95)

Number of specific corrective or remedial (nondisciplinary) actions taken by confidential financial disclosure filers in 2005: **2,090** (2,788)

Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure filers: **142** (76)

Part 8. Advisory Committees/Special Government Employees

Number of Advisory Committees (do not include Federal Advisory Committees (FACA)): **84** (91)

Number of advisory committee members (do not include FACA members): **1,094** (509)

Number of FACA advisory committees: 767 (680)

Number of FACA Advisory Committee members: 30,628 (25,075)

Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

YES 13 (12) NO 125 (114)

Number of Special Government Employees (SGEs) who served as advisory committee members or as experts/consultants and who were required to file financial disclosure reports in 2005; including the total number who actually filed:

	Confidential Reports		Public Reports	
	Required	Filed	Required	Filed
Advisory Committee Members.	<u>17,064</u> (17,918)	<u>16,680</u> (17,800)	<u>19</u> (24)	<u>19</u> (25)
Experts/Consultants	<u>2,384</u> (1,252)	<u>1,538</u> (1,213)	<u>44</u> (48)	<u>44</u> (47)
Board Members	<u>303</u> (348)	<u>280</u> (332)	<u>59</u> (77)	<u>56</u> (75)
Commissioners	<u>75</u> (53)	<u>67</u> (50)	<u>8</u> (9)	<u>8</u> (9)
Other	<u>33</u> (76)	<u>33</u> (63)	<u>0</u> (0)	<u>0</u> (0)
Total	<u>19,859</u> (19,647)	<u>19,598</u> (19,458)	<u>130</u> (158)	<u>127</u> (156)

Number of SGEs filers who took specific corrective or remedial (nondisciplinary) actions in 2005: 121 (140)

Number of § 208(b)(1) waivers granted to special Government employees: 47 (39)

Number of § 208(b)(3) waivers granted to special Government employees: 725 (669)

2006 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY REPORT

NOTE: The following statistics were gathered from responses to the 2006 Ethics Program Questionnaire. The numbers in parentheses are 2005 statistics.

Part 1. Organization/Resources

Number of agencies responding to questionnaire: 139 (138)

Number of full time agency employees: 4,094,989 (4,514,407)

Number of Special Government Employees (SGE): 10,443 (10,851)

Number of IPAs (Intergovernmental Personnel Act): 3,369 (3,333)

Identify the length of time the DAEO has held the position:

- 10 or more years 35 (45)
- 5 – 9 years 24 (28)
- 1 – 4 years 44 (41)
- Less than 1 year 32 (19)
- Position Vacant 4 (5)

Identify the length of time the ADAEO has held the position:

- 10 or more years 21 (24)
- 5 – 9 years 27 (23)
- 1 – 4 years 49 (51)
- Less than 1 year 33 (27)
- Position Vacant 9 (13)

Do you have designated Deputy DAEO(s)?

YES 56 (52) NO 83 (86)

Does your agency have regional or field office ethics officials?

YES 42 (41) NO 97 (97)

Number of ethics officials who worked in the ethics program in 2006: 6,028 (6,124)
(include employees who worked in the region or field offices)

Is the ethics program a separate budgeted item?

YES 7 (5) NO 132 (133)

Number of ethics officials who worked full time on ethics: 335 (456)

Number of ethics officials who worked part time on ethics: 5,693 (5,668)

Number of regional and field office ethics officials: 4,654 (4,772)

Part 2. Program Administration

The following are elements of the ethics program that have been ranked from one (1) being the most time spent to administer to eight (8) being the least time spent to administer.

Public financial disclosure system:	<u>3</u> (3)
Confidential financial disclosure system:	<u>2</u> (1)
Outside activity approval system:	<u>6</u> (6)
Written opinions and counseling:	<u>1</u> (2)
Education and training:	<u>4</u> (4)
Disciplinary process for violations:	<u>8</u> (7)
Special Government employee's activities:	<u>7</u> (8)
Developing information technology applications for any aspect of the ethics program	<u>5</u> (5)

Please indicate which ethics program area(s) your agency contracted out in 2006:

- Initial ethics orientation 1 (2)
- Annual ethics training 4 (4)
- Financial disclosure review 4 (4)
- Internal ethics program review 2 (1)
- Advice and counseling 1 (1)
- Program administration (tracking systems, databases etc.) 6 (6)
- Other 7 (5)
- None 123 (123)

Did your agency perform an internal ethics program review (self evaluation, IG review, etc.) in 2006?

YES 42 (43) NO 97 (95)

What organization within your agency conducted the review?

- Agency Ethics Official(s) 32 (30)
- Inspector General's Office 5 (6)
- General Counsel's Office 14 (13)
- Other 8 (8)

Were you provided feedback from the review?

- YES, Written 12 (15)
- YES, Verbal 20 (22)
- NO feedback provided 10 (6)

Part 3. Education and Training

Number of employees required to receive initial ethics orientation: 350,405 (210,527)

Number of employees who received initial ethics orientation: 309,032 (202,446)

Number of employees required to receive annual ethics training: 1,084,543 (1,173,682)

Total number of employees who received annual ethics training: 964,377 (949,970)

Number of PAS officials who received one-on-one annual ethics training: 332

How do you ensure that your required employees receive annual ethics training?

- Attendance Rosters 105 (106)
- Training Management System 42 (52)
- Training Evaluations 19 (14)
- Other 82 (79)

Identify the topical areas in which training was provided:

- Fourteen Principals of Ethical Conduct 105 (99)
- Gifts 121 (126)
- Impartiality 102 (92)
- Misuse of Position 118 (115)
- Outside and Representational Activities 104 (92)
- Conflicting Financial Interests 119 (115)
- Post Employment 92 (92)
- Seeking Employment 91 (86)
- Other 64 (46)

What kinds of training methods and materials did you use for your training?

- Written Materials 112 (118)
- Videos 51 (56)
- Satellite/Videoconferencing 23 (20)
- Classroom Instruction 86 (86)
- Individual Briefings 86 (91)
- Computer/Web-based Training 90 (90)
- Other 46 (35)

What kinds of written materials did you use for your training?

- Copies of the Standards of Conduct and/or agency supplemental regulations 75 (90)
- Summaries of the Standards of Conduct 77 (77)
- Pamphlets/Brochures 68 (73)
- Newsletters 23 (28)
- Self-study manual 16 (20)
- Hypothetical case studies 55 (55)

What kinds of videos did you use for your training?

- OGE Produced 33 (43)
- Agency Produced 28 (21)

Part 4. Ethics Opinions, Advice and Counseling

The following are topics of the ethics program that have been ranked from one (1) being the most frequent type of advice rendered to ten (10) being the least frequent type of advice rendered.

Outside employment/activities	<u>6</u> (6)
Post-employment restrictions	<u>3</u> (4)
Conflicting financial interests	<u>2</u> (3)
Awards	<u>8</u> (1)
Impartiality in performance of official duties	<u>5</u> (7)
Misuse of position, Government resources and information	<u>7</u> (8)
Travel, subsistence, and related expenses from non-Federal sources	<u>4</u> (5)
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	<u>1</u> (2)

Who is authorized to provide written advice on standards of conduct and conflict of interest statutes? If the DAEO is the General Counsel, please mark DAEO.

- DAEO/Alternate DAEO/Deputies/Ethics Officials 133 (133)
- General Counsel/Staff Attorneys 49 (49)
- Regional Counsels 23 (21)
- Supervisors 2 (3)
- Directors of Personnel/Staff 3 (5)
- Agency Head 7 (8)
- Other 11 (13)

How does your ethics office ensure that accurate opinions, advice and counsel are provided to employees?

- Review all written opinions 76 (75)
- Discuss verbal opinions prior to providing them to employees 96 (97)
- Review written opinions randomly 27 (27)
- Review ethics officials' phone logs 6 (4)
- Conduct periodic discussions with staff 78 (69)
- Offer training 46 (47)
- Other 44 (47)

Part 5. Enforcement of Standards of Ethical Conduct, Criminal and Civil Statutes

Number of disciplinary actions taken in 2006 based wholly or in part upon violations of the standards of ethical conduct provisions (5 C.F.R. part 2635) or the conflict of interest statutes in Title 18 of the United States Code: 3,705 (3,424)

Report the number of disciplinary actions taken based wholly or in part upon *violations of the criminal conflict of interest statutes*, 18 U.S.C. §§ 203, 205, 207, 208, and 209. For purposes of this question,

disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: 50 (30)

Report the number of referrals of potential violations of the criminal conflict of interest statutes: 135 (104)

Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes, 18 U.S.C. 203, 205, 207, 208, and 209, to the Department of Justice (DOJ), including offices of U.S. Attorneys?

- DAEO (Ethics Officials) 73 (69)
- Agency Head 14 (15)
- IG 61 (65)
- General Counsel 36 (41)
- Other 19 (20)

Which office(s) are responsible for notifying OGE when a referral of a potential violation of the criminal conflict of interest statutes have been made to the Department of Justice, including the U.S. Attorneys?

- DAEO (Ethics Officials) 95 (93)
- Agency Head 7 (8)
- IG 43 (44)
- General Counsel 33 (36)
- Other 9 (7)

Part 6. Public Financial Disclosure

Number of public financial disclosure reports (SF 278):

	Nominee/ New Entrant		Annual		Termination		Combination		Total	
	Req	Filed	Req	Filed	Req	Filed	Req	Filed	Req	Filed
PAS	<u>224</u>	<u>223</u>	<u>675</u>	<u>677</u>	<u>128</u>	<u>127</u>	<u>35</u>	<u>34</u>	<u>1,062</u>	<u>1,061</u>
Non-Career SES	<u>138</u>	<u>138</u>	<u>593</u>	<u>591</u>	<u>99</u>	<u>96</u>	<u>33</u>	<u>33</u>	<u>863</u>	<u>858</u>
Career SES	<u>1,222</u>	<u>1,198</u>	<u>8,974</u>	<u>8,944</u>	<u>879</u>	<u>853</u>	<u>320</u>	<u>323</u>	<u>11,395</u>	<u>11,318</u>
Schedule C	<u>509</u>	<u>499</u>	<u>1,223</u>	<u>1,215</u>	<u>311</u>	<u>302</u>	<u>51</u>	<u>51</u>	<u>2,094</u>	<u>2,067</u>
Other	<u>1,227</u>	<u>1,207</u>	<u>8,093</u>	<u>8,069</u>	<u>681</u>	<u>628</u>	<u>199</u>	<u>209</u>	<u>10,200</u>	<u>10,113</u>
Total	<u>3,320</u> (3,587)	<u>3,265</u> (3,513)	<u>19,558</u> (19,050)	<u>19,496</u> (18,877)	<u>2,098</u> (2,190)	<u>2,006</u> (2,074)	<u>638</u> (596)	<u>650</u> (590)	<u>25,614</u> (25,423)	<u>25,417</u> (25,054)

Does your agency require an intermediate review by someone other than an ethics official of all SF 278s?
YES 26 (28) NO 113 (110)

Number of Schedule C employees exempted from the filing requirement by OGE? 124 (111)

Number of filers who requested filing extensions? 3,099 (3,158)
Number of filers who were granted filing extensions? 3,091 (3,152)

Number of filers who requested waivers of the late filing fee? 274 (223)
Number of filers who were granted waivers of the late filing fee? 261 (200)

Number of filers who paid the late filing fee? 47 (40)

Number of requests your agency received for public release of SF 278s? 138 (140)

Number of individual SF 278 reports requested to be released? 751 (140)

Number of public financial disclosures filers who took specific corrective or remedial (nondisciplinary) actions in 2006: 847 (515)

Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure filers: 62 (51)

Part 7. Confidential Financial Disclosure

Total number of new entrant confidential financial disclosure reports (OGE form 450 and alternative approved form) required to be filed by permanent full-time employees in 2006, excluding SGEs: 21,991

Total number of new entrant confidential financial disclosure reports (OGE form 450 and alternative approved form) filed by permanent full-time employees in 2006, excluding SGEs: 20,499

Total number of permanent full-time employees who will be required to file confidential financial disclosure reports (OGE form 450 and alternative approved form) by February 15, 2007, excluding SGEs: 270,287

Part 8. Advisory Committees/Special Government Employees

Number of Advisory Committees (do not include Federal Advisory Committees (FACA)): 159 (84)
Number of advisory committee members (do not include FACA members): 3,359 (1,094)

Number of FACA advisory committees: 670 (767)
Number of FACA Advisory Committee members: 23,375 (30,628)

Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

YES 10 (13) NO 129 (125)

Number of Special Government Employees (SGEs) who served as advisory committee members or as experts/consultants and who were required to file financial disclosure reports in 2006; including the total number who actually filed:

	Confidential Reports		Public Reports	
	Required	Filed	Required	Filed
Advisory Committee Members.	<u>16,932</u>	<u>16,553</u>	<u>33</u>	<u>33</u>
Experts/Consultants	<u>2,558</u>	<u>1,352</u>	<u>32</u>	<u>30</u>
Board Members	<u>304</u>	<u>265</u>	<u>66</u>	<u>69</u>
Commissioners	<u>93</u>	<u>80</u>	<u>1</u>	<u>1</u>
Other	<u>318</u>	<u>318</u>	<u>1</u>	<u>1</u>
Total	<u>20,205</u> <i>(19,859)</i>	<u>18,568</u> <i>(19,598)</i>	<u>133</u> <i>(130)</i>	<u>134</u> <i>(127)</i>

Number of SGEs filers who took specific corrective or remedial (nondisciplinary) actions in 2006: 405 *(121)*

Number of § 208(b)(1) waivers granted to special Government employees: 59 *(47)*

Number of § 208(b)(3) waivers granted to special Government employees: 538 *(725)*

2007 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY REPORT

NOTE: The following statistics were gathered from responses to the 2007 Agency Ethics Program Questionnaire. The numbers in *parentheses* are 2006 statistics. The 2008 Agency Ethics Program Questionnaire is due to OGE February 2, 2009.

This summary was revised in May 2009 based on corrections submitted by agencies due to follow-up. The following changes are reflected in this revised summary:

Social Security Administration: P7Q1_450Req = 1366; P7Q1_450Filed = 1366; P7Q1_TotalReq = 1366; P7Q1_TotalFiled = 1366

Department of the Airforce: Number of SGEs (P1Q2SGE) = 690

US Mint: P6Q1A_CareerReq = 6; P6Q1A_CareerFiled = 6; P6Q1Total_CareerReq = 6; P6Q1Total_CareerFiled = 6; P6Q1N_SchCReq = 2; P6Q1N_SchCFiled = 2; P6Q1Total_SchCReq = 3; P6Q1Total_SchCFiled = 3; P6Q1N_TotalReq = 2; P6Q1N_TotalFiled = 2; P6Q1A_TotalReq = 9; P6Q1A_TotalFiled = 9; P6Q1Total_TotalReq = 11; P6Q1Total_TotalFiled = 11

Federal Energy Regulatory Commission (FERC): P3Q3 Other = Yes; P3Q3OtherInfo = Hatch Act; P6Q1A_CareerReq = 41; P6Q1A_CareerFiled = 41; P6Q1Total_CareerReq = 47; P6Q1Total_CareerFiled = 43; P6Q1A_TotalReq = 76; P6Q1A_TotalFiled = 76; P6Q1Total_TotalReq = 87; P6Q1Total_TotalFiled = 81; P6Q10 = 8; P7Q3 = 49

Commission for the Preservation of America's Heritage Abroad:

Through follow-up with the Commission for the Preservation of America's Heritage Abroad, OGE determined that the data it had for the agency was a duplicate of the Commission on Civil Rights data. OGE removed the incorrect data from the compilation, but has no 2007 data for the Commission for the Preservation of America's Heritage Abroad.

Part 1. Organization/Resources

Number of agencies responding to questionnaire: 140 [129 plus 11 Treasury components] (139)[128 plus 11 Treasury components]

Note: Data below reflects a single, combined Treasury submission

Number of full time agency employees: 4,211,190 (4,094,989)

Number of Special Government Employees (SGE): **16,765** (10,443)

Number of IPAs (Intergovernmental Personnel Act): **3,399** (3,369)

Identify the length of time the DAEO has held the position:

- 10 or more years **35** (35)
- 5 – 9 years **26** (24)
- 1 – 4 years **51** (44)
- Less than 1 year **12** (32)
- Position Vacant **2** (4)

Identify the length of time the ADAEO has held the position:

- 10 or more years **20** (21)
- 5 – 9 years **23** (27)
- 1 – 4 years **54** (49)
- Less than 1 year **18** (33)
- Position Vacant **5**(9)

Do you have designated Deputy DAEO(s)?

YES **51** (56) NO **77** (83)

Does your agency have regional or field office ethics officials?

YES **38** (42) NO **90** (97)

Functional location (s) of regional or field ethics officials?

Legal office **36**
Human Resources office **8**
Employee Relations office **4**
Other **12**

Number of ethics officials who worked in the ethics program in 2007: 6,406 (6,028)
(include employees who worked in the region or field offices)

Number of ethics officials who worked full time on ethics: 728 (335)

Number of ethics officials who worked part time on ethics: 5,678 (5,693)

Number of regional and field office ethics officials: 5,031 (4,654)

Is the ethics program a separate budgeted item?

YES **34**(7) NO **95** (132)

Part 2. Program Administration

The following are elements of the ethics program that have been ranked from one (1) being the most time spent to administer to eight (8) being the least time spent to administer.

Public financial disclosure system:	<u>3</u> (3)
Confidential financial disclosure system:	<u>2</u> (2)
Outside activity approval system:	<u>5</u> (6)
Written opinions and counseling:	<u>1</u> (1)
Education and training:	<u>4</u> (4)
Disciplinary process for violations:	<u>8</u> (8)
Special Government employee's activities:	<u>7</u> (7)
Developing information technology applications for any aspect of the ethics program	<u>6</u> (5)

Indicate which ethics program area(s) your agency contracted out (*outside of the Government*) in 2007:

- Initial ethics orientation 3 (1)
- Annual ethics training 6 (4)
- Financial disclosure review 5 (4)
- Internal ethics program review 3 (2)
- Advice and counseling 3 (1)
- Program administration (tracking systems, databases etc.) 4 (6)
- Other 7 (7)
- None 107 (123)

Did your agency perform an internal ethics program review (self evaluation, IG review, etc.) in 2007?

YES 46 (42) NO 82 (97)

What organization within your agency conducted the review?

- Agency Ethics Official(s) 26 (32)
- Inspector General's Office 5 (5)
- General Counsel's Office 5 (14)
- Other 12 (8)

Were you provided feedback from the review?

- YES, Written 13 (12)
- YES, Verbal 23 (20)
- NO feedback provided 12 (10)

Part 3. Education and Training

Number of employees required to receive initial ethics orientation: 197,688 (350,405)

Number of employees who received initial ethics orientation: 195,089 (309,032)

How often do you provide initial ethics orientation?

- Once a week 12
- Every two weeks 34
- Every ninety days 14
- Other (specify) 96

Number of employees required to receive annual ethics training: **466,682** (1,084,543)

Total number of employees who received annual ethics training: **586,608** (964,377)

Number of PAS officials who received one-on-one annual ethics training: **322** (332)

How do you ensure that your required employees receive annual ethics training?

- Attendance Rosters **89** (105)
- Training Management System **44** (42)
- Training Evaluations **18** (19)
- Other **75** (82)

Identify the topical areas in which training was provided:

- Fourteen Principals of Ethical Conduct **98** (105)
- Gifts **106** (121)
- Impartiality **91** (102)
- Misuse of Position **98** (118)
- Outside and Representational Activities **91** (104)
- Conflicting Financial Interests **103** (119)
- Post Employment **82** (92)
- Seeking Employment **87** (91)
- Other **68** (64)

What kinds of training methods and materials did you use for your training?

- Written Materials **106** (112)
- Copies of the Standards of Conduct and/or agency supplemental regulations **68** (75)
- Summaries of the Standards of Conduct **61** (77)
- Pamphlets/Brochures **55** (68)
- Newsletters **26** (23)
- Self-study manual **15** (16)
- Hypothetical case studies **44** (55)
- Videos **50** (51)
 - o OGE Produced **27** (33)
 - o Agency Produced **23** (28)
- Satellite/Videoconferencing **17** (23)
- Classroom Instruction **79** (86)
- Individual Briefings **78** (86)
- Computer/Web-based Training **85** (90)
- Other **33** (46)

Part 4. Ethics Opinions, Advice and Counseling

The following are topics of the ethics program that have been ranked from one (1) being the most frequent type of advice rendered to ten (10) being the least frequent type of advice rendered.

Outside employment/activities **2** (6)

Post-employment restrictions	<u>5</u> (3)
Conflicting financial interests	<u>3</u> (2)
Awards	<u>8</u> (8)
Impartiality in performance of official duties	<u>6</u> (5)
Misuse of position, Government resources and information	<u>7</u> (7)
Travel, subsistence, and related expenses from non-Federal sources	<u>4</u> (4)
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	<u>1</u> (1)

Who is authorized to provide written advice on standards of conduct and conflict of interest statutes? If the DAEO is the General Counsel, please mark DAEO.

- DAEO/Alternate DAEO/Deputies/Ethics Officials 124 (133)
- General Counsel/Staff Attorneys 37 (49)
- Regional Counsels 16 (23)
- Supervisors 1 (2)
- Directors of Personnel/Staff 1 (3)
- Agency Head 7 (7)
- Other 8 (11)

How does your DAEO or HQ ethics office ensure that accurate and consistent opinions, advice, and counsel are provided to employees?

- Review all written opinions 71 (76)
- Discuss verbal opinions prior to providing them to employees 89 (96)
- Review written opinions randomly 26 (27)
- Review ethics officials' phone logs 4 (6)
- Conduct periodic discussions with staff 71 (78)
- Offer training 38 (46)
- Other 43 (44)

Part 5. Enforcement of Standards of Ethical Conduct, Criminal and Civil Statutes

Number of disciplinary actions taken based wholly or in part upon violations of the standards of ethical conduct provisions (5 C.F.R. part 2635). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 2,854 (3,705)

Report the number of disciplinary actions taken based wholly or in part upon *violations of the criminal conflict of interest statutes*, 18 U.S.C. §§ 203, 205, 207, 208, and 209. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 98 (50)

Report the number of referrals of potential violations of the criminal conflict of interest statutes. 178 (135)

Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes, 18 U.S.C. 203, 205, 207, 208, and 209, to the Department of Justice (DOJ), including offices of U.S. Attorneys?

- DAEO (Ethics Officials) 70 (73)
- Agency Head 15 (14)
- IG 61 (61)
- General Counsel 42 (36)
- Other 16 (19)

Which office(s) are responsible for notifying OGE when a referral of a potential violation of the criminal conflict of interest statutes have been made to the Department of Justice, including the U.S. Attorneys?

- DAEO (Ethics Officials) 88 (95)
- Agency Head 12 (7)
- IG 41 (43)
- General Counsel 36 (33)
- Other 8 (9)

Part 6. Public Financial Disclosure

Number of public financial disclosure reports (SF 278):

	Nominee/ New Entrant		Annual		Termination		Combination		Total	
	Req	Filed	Req	Filed	Req	Filed	Req	Filed	Req	Filed
PAS	<u>225</u>	<u>225</u>	<u>744</u>	<u>744</u>	<u>97</u>	<u>93</u>	<u>30</u>	<u>31</u>	<u>1,096</u>	<u>1,093</u>
Non-Career SES	<u>170</u>	<u>169</u>	<u>616</u>	<u>614</u>	<u>116</u>	<u>114</u>	<u>21</u>	<u>21</u>	<u>923</u>	<u>918</u>
Career SES	<u>1,432</u>	<u>1,402</u>	<u>8,947</u>	<u>8,922</u>	<u>837</u>	<u>795</u>	<u>205</u>	<u>189</u>	<u>11,421</u>	<u>11,308</u>
Schedule C	<u>577</u>	<u>575</u>	<u>1,424</u>	<u>1,417</u>	<u>327</u>	<u>310</u>	<u>41</u>	<u>41</u>	<u>2,369</u>	<u>2,343</u>
Other	<u>1,100</u>	<u>1,089</u>	<u>8,219</u>	<u>8,195</u>	<u>613</u>	<u>597</u>	<u>176</u>	<u>175</u>	<u>10,108</u>	<u>10,056</u>
Total	<u>3,504</u> (3,320)	<u>3,460</u> (3,265)	<u>19,950</u> (19,558)	<u>19,892</u> (19,496)	<u>1,990</u> (2,098)	<u>1,909</u> (2,006)	<u>473</u> (638)	<u>457</u> (650)	<u>25,917</u> (25,614)	<u>25,718</u> (25,417)

Does your agency require an intermediate review by someone other than an ethics official of all SF 278s?

YES 28 (28) NO 100 (110)

Number of Schedule C employees exempted from the filing requirement by OGE? 139 (124)

Number of filers who requested filing extensions? 2,934 (3,099)

Number of filers who were granted filing extensions? 2,897 (3,091)

Number of filers who requested waivers of the late filing fee? 285 (274)

Number of filers who were granted waivers of the late filing fee? 267 (261)

Number of filers who paid the late filing fee? 50 (47)

Number of requests your agency received for public release of SF 278s? 135 (138)

Number of individual SF 278 reports requested to be released? 1,050 (751)

Number of public financial disclosures filers who took specific corrective or remedial (nondisciplinary) actions in 2007: 672 (847)

Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure filers: 46 (62)

Part 7. Confidential Financial Disclosure

Required OGE form 450s: 285,577

Filed OGE form 450s: 238,941

Filed Alternative OGE 450As: 31,288

Alternative OGE approved form: 11,921

Does your agency require an intermediate review by someone other than an ethics official of all OGE form 450s?

YES 35 NO 92

Number of specific corrective or remedial (nondisciplinary) actions taken by confidential financial disclosure filers in 2005: 1,575

Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure filers: 116

Part 8. Advisory Committees/Special Government Employees

Number of Advisory Committees (do not include Federal Advisory Committees (FACA)): 161 (159)

Number of advisory committee members (do not include FACA members): 1,639 (3,359)

Number of FACA advisory committees: 633 (670)

Number of FACA Advisory Committee members: 25,738 (23,375)

Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

YES 11 (10) NO 117 (129)

Number of Special Government Employees (SGEs) who served as advisory committee members or as experts/consultants and who were required to file financial disclosure reports in 2007; including the total number who actually filed:

	Confidential Reports	Public Reports
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	Required	Filed	Required	Filed
Advisory Committee Members.	<u>18,355</u>	<u>18,004</u>	<u>22</u>	<u>22</u>
Experts/Consultants	<u>2,285</u>	<u>1,784</u>	<u>21</u>	<u>21</u>
Board Members	<u>356</u>	<u>344</u>	<u>47</u>	<u>49</u>
Commissioners	<u>226</u>	<u>222</u>	<u>2</u>	<u>2</u>
Other	<u>313</u>	<u>312</u>	<u>0</u>	<u>0</u>
Total	<u>21,535</u> <i>(20,205)</i>	<u>20,666</u> <i>(18,568)</i>	<u>92</u> <i>(133)</i>	<u>94</u> <i>(134)</i>

Number of SGEs filers who took specific corrective or remedial (nondisciplinary) actions in 2006: 357 (405)

Number of § 208(b)(1) waivers granted to special Government employees: 49 (59)

Number of § 208(b)(3) waivers granted to special Government employees: 453 (538)

2009 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY REPORT

NOTE: The following statistics were gathered from responses to the 2009 Agency Ethics Program Questionnaire. The numbers in *parentheses* are 2008 statistics. The 2010 Agency Ethics Program Questionnaire is due to OGE February 2, 2011.

Part 1. Organization/Resources

Number of agencies responding to questionnaire: 144 [133 plus 11 Treasury components] (138) [127 plus 11 Treasury components]

Note: Data below reflects a single, combined Treasury submission

Number of full time agency employees: 4,658,081 (4,464,500)

Number of Special Government Employees (SGE): 17,860 (19,662)

Number of IPAs (Intergovernmental Personnel Act): 3,846 (4,975)

Identify the length of time the DAEO has held the position:

- 10 or more years: 36 (33)
- 5 – 9 years: 32 (26)
- 1 – 4 years: 36 (57)
- Less than 1 year: 25 (6)
- Position Vacant: 4 (3)

Identify the percent of the DAEO's time spent on ethics: 23% average (24%)

Identify the length of time the ADAEO has held the position:

- 10 or more years: 16 (12)
- 5 – 9 years: 34 (26)
- 1 – 4 years: 62 (67)
- Less than 1 year: 13 (13)
- Position Vacant: 3 (7)
- Blank: 5

Identify the percent of the ADAEO's time spent on ethics: 29% average (28%)

Do you have designated Deputy DAEO(s)?

- YES: 45 (46)
- NO: 86 (78)
- Blank: 2

Does your agency have regional or field office ethics officials?

- **YES: 36** (36)
- **NO: 91** (90)
- **Blank: 2**

Organizational location(s) of regional/field ethics officials?

- **Legal office: 27** (30)
- **Human Resources office: 7** (6)
- **Employee Relations office: 5** (4)
- **Other: 20** (16)

If you have regional or field ethics officials, what elements of the ethics program do they administer?

- **Public financial disclosure reports (SF 278): 14** (12)
- **Ethics advice and counseling: 30** (33)
- **Enforcement proceedings: 36** (13)
- **Confidential financial disclosure reports (OGE Form 450): 32** (27)
- **Ethics education and training: 13** (31)
- **Acceptance of travel payments: 19** (15)
- **Other: 10** (8)

If you have regional or field office ethics officials, during 2009 how often did the headquarters ethics office correspond with these officials?

- **Daily: 14** (18)
- **Weekly: 11** (16)
- **Monthly: 5** (15)
- **Quarterly: 1** (5)
- **Semi-Annually: 0** (5)
- **Annually: 0** (5)
- **Other: 7**

If you have regional or field office ethics officials, during 2009 what mechanisms were used by the headquarters ethics office to provide guidance to these officials?

- **Emails: 39** (36)
- **Phone/conference calls: 38** (36)
- **Written memoranda: 31** (31)
- **Periodic status reports: 21** (18)
- **Conferences: 24** (24)
- **Procedural manuals: 19** (17)
- **Other: 16** (11)

Number of ethics officials who worked in the ethics program in 2009: 5,768 (5,599)
(Federal employees only; do not include contractors):

Number of ethics officials who worked full time on ethics: 484 (345)

Number of ethics officials who worked part time on ethics: 5,284 (5,254)

Number of regional and field office ethics officials: 4,047 (4,026)

Are specific resources dedicated to the ethics program?

- YES: 50 (45)
- NO: 74 (82)
- Blank: 9

Part 2. Program Administration

The following are elements of the ethics program that have been ranked from one (1) being the most time spent to administer to eight (8) being the least time spent to administer.

- Public financial disclosure system: 1 (2)
- Confidential financial disclosure system: 2 (1)
- Outside activity approval system: 5 (5)
- Written opinions and counseling: 3 (3)
- Education and training: 4 (4)
- Disciplinary process for violations: 8 (8)
- Special Government employee's activities: 7 (7)
- Developing information technology applications for any aspect of the ethics program: 6 (6)

Indicate the ethics program area(s) for which your agency contracted with non-Government sources in 2009.

- Initial ethics orientation: 2 (2)
- Annual ethics training: 6 (7)
- Public financial disclosure review (SF278): 8 (5)
- Confidential financial disclosure review (OGE Form 450): 8 (5)
- Self-assessment (Previously: Internal ethics program review): 4 (3)
- Advice and counseling: 4 (1)
- Program administration (tracking systems, databases etc.): 16 (12)
- Other: 11 (9)
- None: 102 (104)

Did your agency conduct a self-assessment to evaluate any aspect of the ethics program in 2009?

- YES: 59 (58)
- NO: 74 (69)

What mechanisms were used to conduct the self-assessment?

- Internal Review/Audit: 45 (36)
- Survey: 18 (21)
- Focus Group/Interview: 7 (6)
- Other: 16 (19)

What was the purpose of the self-assessment?

- Assess perceptions about the ethics program: 27 (29)
- Assess employee knowledge of the ethics rules: 25 (22)
- Assess perceptions about the agency's ethical culture: 14 (16)
- Evaluate compliance with applicable ethics laws and regulations: 41 (36)
- Assess transfer of knowledge before or after training: 12 (9)
- Assess satisfaction with training offered: 26 (29)
- Prepare for an OGE program review: 14 (10)
- Other: 13 (14)

What organization conducted the self assessment?

- Ethics Office: 46 (36)
- Inspector General's Office: 8 (4)
- General Counsel's Office: 18 (12)
- Other: 17 (8)

Was the ethics office provided feedback from the self-assessment?

- YES, Written: 22 (17)
- YES, Verbal: 21 (17)
- NO feedback provided: 5 (7)
- Other: 6 (9)

Which of the following tools did your agency use to ensure short-and long-term continuity of operations (succession planning) of its ethics program?

- Training: 102 (91)
- Mentoring: 78 (58)
- Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) (Combined in 2009): 34
- Individual development plans: 27 (21)
- Written manuals/Written standard operating procedures: 60 (46)
- Knowledge library (Intranet, videos, shared drives): 67 (56)
- Competency/Skills gap assessment: 9 (9)
- Resources assessment (personnel and/or financial): 24 (18)
- Other: 19 (11)
- None (New in 2009): 10

Part 3. Education and Training

Number of employees required to receive initial ethics orientation: **266,705*** (289,097)

Number of employees who received initial ethics orientation: **269,008*** (286,041)

**Note: Department of Commerce reported that 1,695 employees received IEO in 2009; however, the agency did not provide the number required to receive IEO. OGE followed-up with the agency several times, but to date, the agency has not provided a number.*

How often do you provide initial ethics orientation?

- **Once a week: 6** (4)
- **Every two weeks: 25** (20)
- **Every 90 days: 3** (2)
- **Other: 95** (94)
- **Blank: 4**

Number of employees required to receive annual ethics training: **515,006** (437,917)

Total number of employees who received annual ethics training: **533,106** (523,516)

How do you ensure that individual employees receive required annual ethics training?

- **Attendance Rosters: 95** (99)
- **Training Management System: 22** (43)
- **Training Evaluations: 40** (20)
- **Coordinate with Human Resources office: 47** (38)
- **Other: 82** (70)

Identify the topical areas in which training was provided:

- **Fourteen Principals of Ethical Conduct: 117** (105)
- **Gifts: 119** (108)
- **Impartiality: 107** (86)
- **Misuse of Position: 111** (102)
- **Outside and Representational Activities: 102** (93)
- **Conflicting Financial Interests: 119** (105)
- **Post Employment: 102** (99)
- **Seeking Employment: 99** (93)
- **Other: 69** (70)

Which of the following training methods did you use for your ethics training?

- **Distribution of Written Materials: 112** (105)
- **Video Presentation: 47** (40)
- **Satellite/Videoconferencing: 30** (26)
- **Classroom Instruction: 90** (92)
- **Individual Briefings: 98** (85)
- **Computer/Web-based Training: 96** (90)

- Other: 29 (25)

Which of the following training materials did you use for your ethics training?

- Copies of the Standards of Conduct and/or agency supplemental regulations: 90 (76)
- Summaries of the Standards of Conduct: 79 (87)
- Pamphlets/Brochures: 69 (72)
- Newsletters: 36 (33)
- Posters: 24 (23)
- Case studies: 58 (67)
- Videos: 42 (40)
- Message from Agency Leadership: 47 (42)
- Other: 51 (48)

Who produced the training materials checked above, in whole or in part?

- My agency: 108 (101)
- Other agency or outside organization: 37 (47)
- OGE: 96 (79)
- Other: 17 (17)

Part 4. Ethics Opinions, Advice and Counseling

The following are topics of the ethics program that have been ranked from one (1) being the most frequent type of advice rendered to eight (8) being the least frequent type of advice rendered.

- Outside employment/activities: 2/3 (2/3)
- Post-employment restrictions: 2/3 (2/3)
- Conflicting financial interests: 4 (4)
- Awards: 8 (8)
- Impartiality in performance of official duties: 6 (6)
- Misuse of position, Government resources and information: 7 (7)
- Travel, subsistence, and related expenses from non-Federal sources: 5 (5)
- Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources: 1 (1)

Who is authorized to provide written advice on standards of conduct? If the General Counsel is also the DAEO, please mark both

- DAEO/Alternate DAEO/Deputies/Ethics Officials: 129 (124)
- General Counsel/Staff Attorneys: 90 (84)
- Regional Counsels: 19 (20)
- Supervisors: 2 (2)
- Directors of Personnel/Staff: 1 (2)
- Agency Head: 8 (9)
- Other: 12 (11)

Who is authorized to provide written advice on conflict of interest statutes? If the General Counsel is also the DAEO, please mark both

- DAEO/Alternate DAEO/Deputies/Ethics Officials: 129 (125)
- General Counsel/Staff Attorneys: 90 (84)
- Regional Counsels: 20 (20)
- Supervisors: 3 (2)
- Human Resources Staff: 1 (1)
- Agency Head: 7 (6)
- Other: 7 (7)

How does your DAEO or HQ ethics office ensure that accurate and consistent opinions, advice and counseling are provided to employees?

- Review all written opinions: 70 (62)
- Review selected written opinions: 40 (41)
- Discuss opinions with staff before providing final decision: 99 (83)
- Review ethics officials' phone logs: 5 (6)
- Conduct periodic discussions with staff: 73 (70)
- Other: 46 (43)

Part 5. Enforcement of Standards of Ethical Conduct, Criminal and Civil Statutes

Number of disciplinary actions taken based wholly or in part upon violations of the standards of ethical conduct provisions (5 C.F.R. part 2635). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 3,695 (3,149)

Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 79 (38)

Number of referrals the ethics office made to the Office of Inspector General of potential Violations of the criminal conflict of Interest statutes: 140 (126)

Number of referrals the agency made to the Department of Justice of potential violations of the criminal conflict of interest statutes: 64 (50)

Calculation: Total number of referrals of potential violations of the criminal conflict of interest statutes. 204 (176)

Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes, to the Department of Justice (DOJ), including offices of U.S. Attorneys?

- DAEO (Ethics Officials): 79 (71)
- General Counsel: 69 (56)
- Agency Head: 27 (22)
- IG: 61 (56)
- Other: 11 (16)

Which office(s) are responsible for notifying OGE when a referral of a potential violation of the criminal conflict of interest statutes have been made to the Department of Justice, including the U.S. Attorneys?

- DAEO (Ethics Officials): 89 (85)
- General Counsel: 60 (52)
- Agency Head: 11 (13)
- IG: 44 (39)
- Other: 10 (7)

Part 6. Public Financial Disclosure

Number of public financial disclosure reports (SF 278):

	Nominee/ New Entrant		Annual		Termination		Combination		Total	
	Req	Filed	Req	Filed	Req	Filed	Req	Filed	Req	Filed
PAS	<u>497</u>	<u>497</u>	<u>428</u>	<u>428</u>	<u>379</u>	<u>372</u>	<u>61</u>	<u>61</u>	<u>1365</u>	<u>1358</u>
Non-Career SES	<u>635</u>	<u>628</u>	<u>556</u>	<u>556</u>	<u>452</u>	<u>451</u>	<u>38</u>	<u>39</u>	<u>1681</u>	<u>1674</u>
Career SES	<u>1033</u>	<u>1028</u>	<u>9507</u>	<u>9442</u>	<u>712</u>	<u>693</u>	<u>220</u>	<u>219</u>	<u>11472</u>	<u>11382</u>
Schedule C	<u>1378</u>	<u>1367</u>	<u>167</u>	<u>166</u>	<u>1126</u>	<u>1113</u>	<u>29</u>	<u>28</u>	<u>2700</u>	<u>2674</u>
Other	<u>1587</u>	<u>1554</u>	<u>8734</u>	<u>8698</u>	<u>630</u>	<u>616</u>	<u>200</u>	<u>199</u>	<u>11151</u>	<u>11067</u>
Total	<u>5,130</u> (3,552)	<u>5,074</u> (3,500)	<u>19,392</u> (19,679)	<u>19,290</u> (19,562)	<u>3,299</u> (1,973)	<u>3,245</u> (1,885)	<u>548</u> (472)	<u>546</u> (478)	<u>28,369</u> (25,678)	<u>28,155</u> (25,425)

Does your agency have written procedures for follow-up with delinquent public financial disclosure (SF 278) filers? (New in 2009)

- YES: 63
- NO: 70

Does your agency require an intermediate review by someone other than an ethics official of all SF 278s?

- YES: 31 (27)
- NO: 102 (100)

Does your agency provide public financial disclosure (SF 278) filers with feedback after their reports have been reviewed? (New in 2009)

- YES: 113
- NO: 20

Does your agency use an electronic filing system?

- YES: 27 (20)
- NO: 104 (107)
- Blank: 2

Which steps in your public financial disclosure program can be completed electronically? (New in 2009)

- Filer electronically completes report: 84
- Filer electronically signs report: 20
- Filer electronically submits signed report for review: 23
- Certifier electronically reviews report: 20
- Certifier electronically signs report: 17
- System electronically stores certified report (with all signatures):18
- Other: 13
- None: 37

Number of Schedule C employees exempted from the filing requirement by OGE: 85 (114)

Number of public financial disclosure (SF 278) filers who requested filing extensions: 2903 (2,794)

Number of public financial disclosure (SF 278) filers who were granted filing extensions: 2960 (2,722)

Note: There were more SF 278 filing extensions granted than requested at the National Labor Relations Board, Department of the Treasury (Bureau of the Public Debt, the Department of the Interior, and the Department of the Army.

Number of public financial disclosure (SF 278) filers who requested waivers of the late filing fee: 178 (195)

Number of public financial disclosure (SF 278) filers who were granted waivers of the late filing fee: 154 (193)

Number of public financial disclosure (SF 278) filers who paid the late filing fee: 64(47)

Number of requests your agency received for public release of SF 278s: 106 (128)

Number of individual SF 278 reports requested to be released: 584 (727)

Number of public financial disclosures filers who took specific corrective or remedial (nondisciplinary) actions in 2008: 1421 (589)

Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure filers: 67 (50)

Part 7. Confidential Financial Disclosure

Number of confidential financial disclosure reports (OGE Form 450, OGE Form 450A, and OGE-approved alternate form) required to be filed by permanent full-time employees in 2009, excluding SGEs.

323,989 [originally 284,890 - revised 6/2010 based on revised numbers from agencies that left the field blank or reported more filed than required]. Note: Despite follow-up, some agencies still reported more filed than

required (Army, Transportation, EPA, NRC). When OGE followed-up with those agencies, they were unable to provide a revised number.

Filed OGE Form 450: 206,096
Filed OGE Form 450A: 55,746
OGE-approved alternative form: 64,100
TOTAL: 325,942

2008

Required OGE form 450s: 291,961

Filed OGE form 450s: 246,071

Filed Alternative OGE 450As: 19,874

Filed Alternative OGE approved form: 19,287

Does your agency have written procedures for follow up with delinquent confidential financial disclosure (OGE Form 450) filers? (New in 2009)

- **YES: 64**
- **NO: 68**
- **Blank: 1**

Does your agency require an intermediate review by someone other than an ethics official of all OGE form 450s?

- **YES: 39 (32)**
- **NO: 93 (94)**
- **Blank: 1**

Does your agency provide confidential financial disclosure (OGE Form 450) filers with feedback after their reports have been reviewed? (New in 2009)

- **YES: 103**
- **NO: 28**
- **Blank: 2**

Which steps in your confidential financial disclosure program can be completed electronically? (New in 2009)

- **Filer electronically completes report: 85**
- **Filer electronically signs report: 23**
- **Filer electronically submits signed report for review: 26**
- **Certifier electronically reviews report: 21**
- **Certifier electronically signs report: 18**
- **System electronically stores certified report (with all signatures): 17**
- **Other: 7**
- **None: 45**

Number of specific corrective or remedial (nondisciplinary) actions taken by confidential financial disclosure filers in 2009: 2410 (1,778)

Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure filers: 59 (60)

Part 8. Advisory Committees/Special Government Employees

Number of Advisory Committees (do not include Federal Advisory Committees (FACA)): 122 (103)

Number of advisory committee members (do not include FACA members): 1617 (1,044)

Number of FACA advisory committees: 808 (732)

Number of FACA Advisory Committee members: 29,987 (260,061)

Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

- YES 8 (12)
 - NO 120 (107)
- Blank: 5

Number of Special Government Employees (SGEs) who served as advisory committee members or as experts/consultants and who were required to file financial disclosure reports in 2008; including the total number who actually filed:

	Confidential Reports		Public Reports	
	Required	Filed	Required	Filed
Advisory Committee Members.	<u>21345</u>	<u>20655</u>	<u>21</u>	<u>22</u>
Experts/Consultants	<u>3112</u>	<u>2503</u>	<u>22</u>	<u>22</u>
Board Members	<u>373</u>	<u>382</u>	<u>63</u>	<u>63</u>
Commissioners	<u>47</u>	<u>48</u>	<u>2</u>	<u>2</u>
Other	<u>464</u>	<u>421</u>	<u>110</u>	<u>110</u>
Total	<u>25,341</u> (22,469)	<u>24,009</u> (21,383)	<u>218</u> (125)	<u>219</u> (127)

Number of SGEs filers who took specific corrective or remedial (nondisciplinary) actions in 2008: 564 (316)

Number of § 208(b)(1) waivers granted to special Government employees: 46 (52)

Number of § 208(b)(3) waivers granted to special Government employees: 411 (375)

2008 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY REPORT

NOTE: The following statistics were gathered from responses to the 2008 Agency Ethics Program Questionnaire. The Office of the Vice President, the National Security Council, and the White House did not submit questionnaires in 2008. The numbers in *parentheses* are 2007 statistics. The 2009 Agency Ethics Program Questionnaire is due to OGE February 2, 2010.

Part 1. Organization/Resources

Number of agencies responding to questionnaire: **138** [127 plus 11 Treasury components] (140) [129 plus 11 Treasury components]

Note: Data below reflects a single, combined Treasury submission

Number of full time agency employees: **4,464,500** (4,211,190)

Number of Special Government Employees (SGE): **19,662** (16,765)

Number of IPAs (Intergovernmental Personnel Act): **4,975** (3,399)

Identify the length of time the DAEO has held the position:

- 10 or more years: **33** (35)
- 5 – 9 years: **26** (26)
- 1 – 4 years: **57** (51)
- Less than 1 year: **6** (12)
- Position Vacant: **3** (2)

Identify the percent of the DAEO's time spent on ethics: **24%** average (23%)

Identify the length of time the ADAEO has held the position:

- 10 or more years: **12** (20)
- 5 – 9 years: **26** (23)
- 1 – 4 years: **67** (54)
- Less than 1 year: **13** (18)
- Position Vacant: **7** (5)

Identify the percent of the ADAEO's time spent on ethics: **28%** average (28%)

Do you have designated Deputy DAEO(s)?

- YES: **46** (51)
- NO: **78** (77)

Does your agency have regional or field office ethics officials?

- **YES: 36** (38)
- **NO: 90** (90)

Organizational location(s) of regional/field ethics officials? (New in 2008)

- **Legal office: 30** (36)
- **Human Resources office: 6** (8)
- **Employee Relations office: 4** (4)
- **Other: 16** (12)

If you have regional or field ethics officials, what elements of the ethics program do they administer? (New in 2008)

- **Public financial disclosure reports (SF 278): 12**
- **Ethics advice and counseling: 33**
- **Enforcement proceedings: 13**
- **Confidential financial disclosure reports (OGE Form 450): 27**
- **Ethics education and training: 31**
- **Acceptance of travel payments: 15**
- **Other: 8**

If you have regional or field office ethics officials, during 2008 how often did the headquarters ethics office correspond with these officials? (New in 2008)

- **Daily: 18**
- **Weekly: 16**
- **Monthly: 15**
- **Quarterly: 5**
- **Semi-Annually: 5**
- **Annually: 5**

If you have regional or field office ethics officials, during 2008 what mechanisms were used by the headquarters ethics office to provide guidance to these officials? (New in 2008)

- **Emails: 36**
- **Phone/conference calls: 36**
- **Written memoranda: 31**
- **Periodic status reports: 18**
- **Conferences: 24**
- **Procedural manuals: 17**
- **Other: 11**

Number of ethics officials who worked in the ethics program in 2008: 5,599 (6,406)
(Federal employees only; do not include contractors):

Number of ethics officials who worked full time on ethics: 345 (728)

Number of ethics officials who worked part time on ethics: 5,254 (5,678)

Number of regional and field office ethics officials: 4,026 (5,031)

Are specific resources dedicated to the ethics program?

- YES: 45 (34)
- NO: 82 (95)

Part 2. Program Administration

The following are elements of the ethics program that have been ranked from one (1) being the most time spent to administer to eight (8) being the least time spent to administer.

- Public financial disclosure system: 2 (3)
- Confidential financial disclosure system: 1 (2)
- Outside activity approval system: 5 (5)
- Written opinions and counseling: 3 (1)
- Education and training: 4 (4)
- Disciplinary process for violations: 8 (8)
- Special Government employee's activities: 7 (7)
- Developing information technology applications for any aspect of the ethics program: 6 (6)

Indicate the ethics program area(s) for which your agency contracted with non-Government sources in 2008.

- Initial ethics orientation: 2 (3)
- Annual ethics training: 7 (6)
- Public financial disclosure review (SF278) (New in 2008) (Previously: Financial disclosure review): 5
- Confidential financial disclosure review (OGE Form 450) (New in 2008) (Previously: Financial disclosure review): 5
- Self-assessment (Previously: Internal ethics program review): 3 (3)
- Advice and counseling: 1 (3)
- Program administration (tracking systems, databases etc.): 12 (4)
- Other: 9 (7)
- None: 104 (107)

Did your agency conduct a self-assessment to evaluate any aspect of the ethics program in 2008? (Previously: Did your agency perform an internal ethics program review (self evaluation, IG review, etc.) in 2007?)

- YES: 58 (46)
- NO: 69 (82)

What mechanisms were used to conduct the self-assessment? (New in 2008)

- Internal Review/Audit: 36
- Survey: 21
- Focus Group/Interview: 6
- Checklist: 8

- Other: 19

What was the purpose of the self-assessment? (New in 2008)

- Assess perceptions about the ethics program: 29
- Assess employee knowledge of the ethics rules: 22
- Assess perceptions about the agency's ethical culture: 16
- Evaluate compliance with applicable ethics laws and regulations: 36
- Assess transfer of knowledge before or after training: 9
- Assess satisfaction with training offered: 29
- Prepare for an OGE program review: 10
- Other: 14

What organization conducted the self assessment? (Previously: What organization within your agency conducted the review?)

- Agency Ethics Official(s): 36 (26)
- Inspector General's Office: 4 (5)
- General Counsel's Office: 12 (5)
- Other: 8 (12)

Was the ethics office provided feedback from the self-assessment? (Previously: Were you provided feedback from the review?)

- YES, Written: 17 (13)
- YES, Verbal: 17 (23)
- NO feedback provided: 7 (12)
- Other: 9 (New in 2008)

Which of the following tools did your agency use to ensure short-and long-term continuity of operations (succession planning) of its ethics program? (New in 2008)

- Training: 91
- Mentoring: 58
- Cross training/Developmental assignments/Detail assignments: 36
- Individual development plans: 21
- Job Rotation/Use of agency developmental programs (e.g., Intern, Fellows, Leadership Development Programs): 9
- Written manuals/Written standard operating procedures: 46
- Knowledge library (Intranet, videos, shared drives): 56
- Competency/Skills gap assessment: 9
- Resources assessment (personnel and/or financial): 18
- Other: 11

Part 3. Education and Training

Number of employees required to receive initial ethics orientation: **289,097** (197,688)

Number of employees who received initial ethics orientation: **286,041** [CY 08 revised on 7/20/09 to reflect revision from DIA] (195,089)

How often do you provide initial ethics orientation?

- Once a week: **4** (12)
- Every two weeks: **20** (34)
- Every 90 days: **2** (14)
- Other: **94** (96)

Number of employees required to receive annual ethics training: **437,917** (466,682)

Total number of employees who received annual ethics training: **523,516** (586,608)

Number of PAS officials who received one-on-one annual ethics training: **328** (322)

How do you ensure that individual employees receive required annual ethics training?

- Attendance Rosters: **99** (89)
- Training Management System: **43** (44)
- Training Evaluations: **20** (18)
- Coordinate with Human Resources office (New in 2008): **38**
- Other: **70** (75)

Identify the topical areas in which training was provided:

- Fourteen Principals of Ethical Conduct: **105** (98)
- Gifts: **108** (106)
- Impartiality: **86** (91)
- Misuse of Position: **102** (98)
- Outside and Representational Activities: **93** (91)
- Conflicting Financial Interests: **105** (103)
- Post Employment: **99** (82)
- Seeking Employment: **93** (87)
- Other: **70** (68)

Which of the following training methods did you use for your ethics training (Previously: What kinds of training methods and materials did you use for your training?)

- Written Materials: **105** (106)
- Videos: **40** (50)
- Satellite/Videoconferencing: **26** (17)
- Classroom Instruction: **92** (79)
- Individual Briefings: **85** (78)
- Computer/Web-based Training: **90** (85)
- Other: **25** (33)

Which of the following training materials did you use for your ethics training? (Previously: What kinds of training methods and materials did you use for your training)

- Copies of the Standards of Conduct and/or agency supplemental regulations: 76 (68)
- Summaries of the Standards of Conduct: 87 (61)
- Pamphlets/Brochures: 72 (55)
- Newsletters: 33 (26)
- Posters (New in 2008): 23
- Hypothetical case studies: 67 (44)
- Videos: 40 (50)
- Message from Agency Leadership (New in 2008): 42
- Other: 48 (33)

Who produced the training materials checked above, in whole or in part? (New in 2008)

- My agency: 101
- Other agency or outside organization: 47
- OGE: 79
- Other: 17

Part 4. Ethics Opinions, Advice and Counseling

The following are topics of the ethics program that have been ranked from one (1) being the most frequent type of advice rendered to eight (8) being the least frequent type of advice rendered.

- Outside employment/activities: 2/3 (2)
- Post-employment restrictions: 2/3 (5)
- Conflicting financial interests: 4 (3)
- Awards: 8 (8)
- Impartiality in performance of official duties: 6 (6)
- Misuse of position, Government resources and information: 7 (7)
- Travel, subsistence, and related expenses from non-Federal sources: 5 (4)
- Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources: 1 (1)

Who is authorized to provide written advice on standards of conduct? If the General Counsel is also the DAEO, please mark both (New in 2008) (Previously: Who is authorized to provide written advice on standards of conduct and conflict of interest statutes?).

- DAEO/Alternate DAEO/Deputies/Ethics Officials: 124
- General Counsel/Staff Attorneys: 84
- Regional Counsels: 20
- Supervisors: 2
- Directors of Personnel/Staff: 2
- Agency Head: 9
- Other: 11

Who is authorized to provide written advice on conflict of interest statutes? If the General Counsel is also the DAEO, please mark both (New in 2008) (Previously: Who is authorized to provide written advice on standards of conduct and conflict of interest statutes?).

- DAEO/Alternate DAEO/Deputies/Ethics Officials: 125
- General Counsel/Staff Attorneys: 84
- Regional Counsels: 20
- Supervisors: 2
- Directors of Personnel/Staff: 1
- Agency Head: 6
- Other: 7

How does your DAEO or HQ ethics office ensure that accurate and consistent opinions, advice and counseling are provided to employees?

- Review all written opinions: 62 (71)
- Review selected written opinions (Previously: Review written opinions randomly?): 41 (26)
- Discuss opinions with staff before providing final decision (Previously: Discuss verbal opinions prior to providing them to employees): 83 (89)
- Review ethics officials' phone logs: 6 (4)
- Conduct periodic discussions with staff: 70 (71)
- Other: 52(43)

Part 5. Enforcement of Standards of Ethical Conduct, Criminal and Civil Statutes

Number of disciplinary actions taken based wholly or in part upon violations of the standards of ethical conduct provisions (5 C.F.R. part 2635). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 3,149 (2,854)

Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 38 (98)

Number of referrals the ethics office made to the Office of Inspector General of potential Violations of the criminal conflict of Interest statutes: 126 (102)

Number of referrals the agency made to the Department of Justice of potential violations of the criminal conflict of interest statutes: 50 (76)

Calculation: Total number of referrals of potential violations of the criminal conflict of interest statutes. 176 (178)

Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes, to the Department of Justice (DOJ), including offices of U.S. Attorneys?

- DAEO (Ethics Officials): 71 (70)
- General Counsel: 56 (42)
- Agency Head: 22 (15)
- IG: 56 (61)

- Other: 16 (16)

Which office(s) are responsible for notifying OGE when a referral of a potential violation of the criminal conflict of interest statutes have been made to the Department of Justice, including the U.S. Attorneys?

- DAEO (Ethics Officials): 85 (88)
- General Counsel: 52 (36)
- Agency Head: 13 (12)
- IG: 39 (41)
- Other: 7 (8)

Part 6. Public Financial Disclosure

Number of public financial disclosure reports (SF 278):

	Nominee/ New Entrant		Annual		Termination		Combination		Total	
	Req	Filed	Req	Filed	Req	Filed	Req	Filed	Req	Filed
PAS	<u>171</u>	<u>171</u>	<u>754</u>	<u>754</u>	<u>96</u>	<u>87</u>	<u>28</u>	<u>28</u>	<u>1049</u>	<u>1040</u>
Non-Career SES	<u>102</u>	<u>101</u>	<u>769</u>	<u>767</u>	<u>125</u>	<u>120</u>	<u>24</u>	<u>25</u>	<u>1020</u>	<u>1013</u>
Career SES	<u>1458</u>	<u>1423</u>	<u>9452</u>	<u>9378</u>	<u>863</u>	<u>840</u>	<u>155</u>	<u>152</u>	<u>11928</u>	<u>11793</u>
Schedule C	<u>557</u>	<u>548</u>	<u>1217</u>	<u>1205</u>	<u>376</u>	<u>343</u>	<u>58</u>	<u>58</u>	<u>2208</u>	<u>2154</u>
Other	<u>1264</u>	<u>1257</u>	<u>7487</u>	<u>7458</u>	<u>513</u>	<u>495</u>	<u>207</u>	<u>215</u>	<u>9471</u>	<u>9425</u>
Total	<u>3,552</u> (3,504)	<u>3,500</u> (3,460)	<u>19,679</u> (19,950)	<u>19,562</u> (19,892)	<u>1,973</u> (1,990)	<u>1,885</u> (1,909)	<u>472</u> (473)	<u>478</u> (457)	<u>25,678</u> (25,917)	<u>25,425</u> (25,719)

Does your agency require an intermediate review by someone other than an ethics official of all SF 278s?

- YES 27 (28)
- NO 100 (100)

Does your agency use an electronic filing system? (New in 2008)

- YES 20
- NO 107

Number of Schedule C employees exempted from the filing requirement by OGE: 114 (139)

Number of public financial disclosure (SF 278) filers who requested filing extensions: 2,794 (2,934)

Number of public financial disclosure (SF 278) filers who were granted filing extensions: 2,722 (2,897)

Number of public financial disclosure (SF 278) filers who requested waivers of the late filing fee: 195 (285)

Number of public financial disclosure (SF 278) filers who were granted waivers of the late filing fee: 193 (267)

Number of public financial disclosure (SF 278) filers who paid the late filing fee: 47 (50)

Number of requests your agency received for public release of SF 278s: 128 (135)

Number of individual SF 278 reports requested to be released: 727 (1,050)

Number of public financial disclosures filers who took specific corrective or remedial (nondisciplinary) actions in 2008: 589 (672)

Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure filers: 50 (46)

Part 7. Confidential Financial Disclosure

Required OGE form 450s: 291,961 (285,577)

Filed OGE form 450s: 246,071 (238,941)

Filed Alternative OGE 450As: 19,874 (31,288)

Filed Alternative OGE approved form: 19,287 (11,921)

Does your agency require an intermediate review by someone other than an ethics official of all OGE form 450s?

- YES 32 (35)
- NO 94 (92)

Number of specific corrective or remedial (nondisciplinary) actions taken by confidential financial disclosure filers in 2008: 1,778 (1,575)

Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure filers: 60 (116)

Part 8. Advisory Committees/Special Government Employees

Number of Advisory Committees (do not include Federal Advisory Committees (FACA)): 103 (161)

Number of advisory committee members (do not include FACA members): 1,044 (1,639)

Number of FACA advisory committees: 732 (633)

Number of FACA Advisory Committee members: 26,061 (25,738)

Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

- YES 12 (11)
- NO 107 (117)

Number of Special Government Employees (SGEs) who served as advisory committee members or as experts/consultants and who were required to file financial disclosure reports in 2008; including the total number who actually filed:

	Confidential Reports		Public Reports	
	Required	Filed	Required	Filed
Advisory Committee Members.	<u>18755</u>	<u>18267</u>	<u>25</u>	<u>26</u>
Experts/Consultants	<u>2754</u>	<u>2190</u>	<u>22</u>	<u>20</u>
Board Members	<u>280</u>	<u>261</u>	<u>76</u>	<u>79</u>
Commissioners	<u>70</u>	<u>67</u>	<u>2</u>	<u>2</u>
Other	<u>610</u>	<u>598</u>	<u>0</u>	<u>0</u>
Total	<u>22,469</u> (21,535)	<u>21,383</u> (20,666)	<u>125</u> (92)	<u>127</u> (94)

Number of SGEs filers who took specific corrective or remedial (nondisciplinary) actions in 2008: 316 (357)

Number of § 208(b)(1) waivers granted to special Government employees: 52 (49)

Number of § 208(b)(3) waivers granted to special Government employees: 375 (453)

2010 AGENCY ETHICS PROGRAM QUESTIONNAIRE SUMMARY

SUBMISSION DEADLINE: FEBRUARY 1, 2011

PART 1. ORGANIZATION/RESOURCES

1. Agency: **134 responding agencies (Treasury subcomponents combined; also includes OGE)**
2. Number of full-time agency employees as of December 31, 2010 (*include employees detailed to another agency*): **4,738,160**
3. Number of special Government employees¹ (SGE) as of December 31, 2010: **19,623**
4. Number of IPAs² (Intergovernmental Personnel Act) as of December 31, 2010: **4,749**

¹ For purposes of this questionnaire, the term “special Government employee” (SGE) means an officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days. In addition to these officers and employees, the term includes:

- Part-time United States commissioners
- Part-time United States magistrates
- Independent counsels appointed under chapter 40 of title 28 and any person appointed by those independent counsels under section 594(c) of title 28, regardless of the number of days of appointment for either of these positions
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily

The terms “officer or employee” and “SGE” shall not include enlisted members of the Armed Forces.

² The term “IPA” refers to employees appointed or detailed to positions under the Intergovernmental Personnel Act (5 U.S.C. §§ 3371-3376). Include the number of incoming appointments and outgoing details.

5. Name and title of the Designated Agency Ethics Official (DAEO):
- a) Name: _____
- b) Title: _____
- c) Length of time the DAEO has held this position:
- 10 or more years (**38 agencies**)
 - 5 - 9 years (**28 agencies**)
 - 1 - 4 years (**46 agencies**)
 - Less than 1 year (**22 agencies**)
 - Position vacant
- d) Grade level of the DAEO: _____
- e) Percent of the DAEO's time spent on ethics: **23% (average)**
6. Name and title of the Alternate DAEO (ADAEO):
- a) Name: _____
- b) Title: _____
- c) Length of time the ADAEO has held this position:
- 10 or more years (**17 agencies**)
 - 5 - 9 years (**37 agencies**)
 - 1 - 4 years (**53 agencies**)
 - Less than 1 year (**20 agencies**)
 - Position vacant (**2 agencies**)
- d) Grade level of the ADAEO: _____
- e) Percent of the ADAEO's time spent on ethics: **31% (average)**
7. Does your agency have a designated Deputy DAEO(s)? Yes (**48 agencies**) No (**81 agencies**); **5 agencies blank.** (If No, skip to question 8.)
- Name(s) and title(s) of designated Deputy DAEO(s):
- _____
- _____
- _____
8. Which of your agency's ethics officials have ethics duties as an element in their **position descriptions**? Check all that apply.
- DAEO (**100 agencies**)
 - ADAEO (**80 agencies**)
 - Deputy DAEO(s) (**30 agencies**)
 - Other ethics official(s) (specify) (**48 agencies**)
 - None (**16 agencies**)
9. Which of your agency's ethics officials have ethics duties as an element in their **performance appraisals**? Check all that apply.
- DAEO (**88 agencies**)
 - ADAEO (**80 agencies**)
 - Deputy DAEO(s) (**34 agencies**)
 - Other ethics official(s) (specify) (**44 agencies**)
 - None (**27 agencies**)
10. What type of training is provided to ethics officials to assist them in carrying out their ethics duties? Check all that apply.
- Training provided by OGE (**119 agencies**)

- Structured training provided by your agency to groups of ethics officials (i.e., instructor-led training) **(30 agencies)**
- One-on-one training provided by your agency **(65 agencies)**
- Written education materials provided by your agency **(56 agencies)**
- Multimedia training (e.g., videotaped or computer-based training) **(45 agencies)**
- On-the-job training provided by your agency **(87 agencies)**
- Other (specify) **(31 agencies)**
- None **(2 agencies)**

11. Agency Ethics Program Structure:

- a) How would you describe the structure of your agency's ethics program? Check one.
- Ethics program management is conducted solely within the main ethics office. **(104 agencies)**
 - Ethics program management is distributed among multiple parts of the agency. **(13 agencies)**
 - Other (specify) **(16 agencies)**

Blank: 1

- b) What aspects of your ethics program are managed outside of the main ethics office? Check all that apply.
- Public financial disclosure program **(11 agencies)**
 - Confidential financial disclosure program **(20 agencies)**
 - Ethics advice and counseling **(22 agencies)**
 - Ethics education and training **(19 agencies)**
 - Assessment of program performance **(8 agencies)**
 - Other (specify) **(16 agencies)**
 - None **(98 agencies)**
- c) Who does the DAEO report to regarding his/her ethics responsibilities?
- Agency Head **(95 agencies)**
 - General Counsel **(30 agencies)**
 - Human Resources Director **(1 agency)**
 - Other (specify) **(20 agencies)**

Who manages the day-to-day functions of your agency's ethics program? Check all that apply.

- DAEO **(88 agencies)**
- ADAEO **(75 agencies)**
- Deputy DAEO(s) **(31 agencies)**
- Program Manager(s) **(15 agencies)**
- Other (specify) **(27 agencies)**

12. Number of ethics officials who worked in the ethics program in 2010 (Federal employees only; do not include contractors):

	Worked full-time on ethics	Worked part-time on ethics
HQ ethics officials	385	1486
Regional/field office ethics officials	146	3840

13. Are specific resources dedicated to the ethics program? Yes (**52 agencies**) No (**73 agencies**)
; **Blank: 9**

ADDITIONAL COMMENTS FOR PART 1.

PART 2. PROGRAM ADMINISTRATION

1. Use the following scale to rate the amount of time your agency spends to administer each item.
**Time Spent Scale: 1= No time 2=Limited amount of time 3=Moderate amount of time
4=Considerable amount of time 5=Extreme amount of time**

	Time Spent					Rank
Public financial disclosure program (SF 278/OGE Form 278)	1	2	3	4	5	3
Confidential financial disclosure program (OGE Form 450)	1	2	3	4	5	1
Outside activity approval program	1	2	3	4	5	5
Written opinions and counseling	1	2	3	4	5	2
Education and training	1	2	3	4	5	4
Disciplinary process for violations	1	2	3	4	5	8
Special Government employee activities	1	2	3	4	5	7
Developing information technology applications for any aspect of the ethics program	1	2	3	4	5	6

2. Indicate the ethics program areas(s) for which your agency contracted with non-Government sources in 2010. Check all that apply.
- Initial ethics orientation (**4 agencies**)
 - Annual ethics training (**5 agencies**)
 - Public financial disclosure review (SF 278/OGE Form 278) (**6 agencies**)
 - Confidential financial disclosure review (OGE Form 450) (**6 agencies**)
 - Program assessment/review (**3 agencies**)
 - Advice and counseling (**5 agencies**)
 - Program administration (tracking systems, databases, etc.) (**12 agencies**)
 - Other (specify) (**12 agencies**)
 - None (**103 agencies**)

3. Did your agency conduct a self-assessment to evaluate any aspect of the ethics program in 2010? Yes **(60 agencies)** No **(74 agencies)** (If No, skip to question 4.)
- a) What mechanisms were used to conduct the self-assessment? Check all that apply.
- Internal Review/Audit **(45 agencies)**
 - Survey **(19 agencies)**
 - Focus Group/Interview **(6 agencies)**
 - Other (specify) **(20 agencies)**
- b) What was the purpose of the self-assessment? Check all that apply.
- Assess employee perceptions about the ethics program **(26 agencies)**
 - Assess employee knowledge of the ethics rules **(23 agencies)**
 - Assess employee perceptions about the agency's ethical culture **(20 agencies)**
 - Evaluate compliance with applicable ethics laws and regulations **(42 agencies)**
 - Assess employee knowledge before or after training
 - Assess employee satisfaction with training offered **(26 agencies)**
 - Prepare for an OGE program review **(13 agencies)**
 - Other (specify) **(20 agencies)**
- c) What organization conducted the self-assessment? Check all that apply.
- Ethics Office **(42 agencies)**
 - Inspector General's Office **(8 agencies)**
 - General Counsel's Office **(23 agencies)**
 - Other (specify) **(20 agencies)**
- d) If the self-assessment was conducted by other than the ethics office, was the ethics office provided feedback on the self-assessment? Check all that apply.
- Yes, written **(18 agencies)**
 - Yes, verbal **(12 agencies)**
 - No feedback provided **(5 agencies)**
 - Other (specify) **(9 agencies)**
4. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2010? Check all that apply.
- Training **(106 agencies)**
 - Mentoring **(80 agencies)**
 - Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **(41 agencies)**
 - Individual development plans **(35 agencies)**
 - Written manuals/written standard operating procedures **(70 agencies)**
 - Knowledge library (Intranet, videos, shared drives) **(69 agencies)**
 - Competency/skills gap assessment **(8 agencies)**
 - Resources assessment (personnel and/or financial) **(30 agencies)**
 - Other (specify) **(17 agencies)**
 - None **(10 agencies)**
5. Does your agency use an automated system to track the administration of the financial disclosure program? Yes **(41 agencies)** No **(90 agencies); Blank: 3**

If yes, what functions does the automated system perform? Check all that apply.

- Notifies ethics officials of new entrant filers (if selected, skip question 6) **(15 agencies)**
- Maintains master list of filers **(41 agencies)**
- Sends notifications/reminders to filers **(24 agencies)**
- Distributes electronic copies of financial disclosure forms **(22 agencies)**
- Tracks receipt of completed report **(37 agencies)**
- Tracks date of initial review of report **(33 agencies)**
- Tracks status of report review **(29 agencies)**
- Tracks extensions **(37 agencies)**
- Tracks date of certification of report **(39 agencies)**
- Notifies filer of certification of report **(14 agencies)**
- Archives reviewer notes **(29 agencies)**
- Other (specify) **(8 agencies)**

6. How do you receive timely notification of new entrant employees required to file financial disclosure reports?

7. For which aspect(s) of your ethics program do you have written procedures? Check all that apply.

- Financial disclosure **(107 agencies)**
- Training **(85 agencies)**
- Opinion/advice/counsel **(52 agencies)**
- Other (specify) **(39 agencies)**

ADDITIONAL COMMENTS FOR PART 2.

PART 3. EDUCATION AND TRAINING

1. Does your agency use an automated system to administer the ethics training program?

- Yes **47** No **86** ; Blank: **1**

If yes, what functions does the automated system perform? Check all that apply.

- Provides a list of covered employees requiring annual ethics training **(28 agencies)**
- Provides a list of new employees requiring initial ethics orientation **(23 agencies)**
- Sends notifications to employees requiring ethics training **(20 agencies)**
- Sends reminders to employees requiring ethics training **(20 agencies)**
- Distributes electronic copies of training materials **(14 agencies)**
- Allows employees to access online training modules **(36 agencies)**
- Tracks training certifications **(32 agencies)**
- Archives training certifications **(19 agencies)**

Other (specify) **(10 agencies)**

2. Initial Ethics Orientation:

a) Number of employees *required to receive* initial ethics orientation: **229,090**

b) Number of employees who *actually received* initial ethics orientation: **227,325**

c) How often does your agency provide initial ethics orientation?

- Once a week **(2 agencies)**
- Every two weeks **(13 agencies)**
- Every 90 days **(2 agencies)**
- Other (specify) **(64 agencies)**

d) How does your agency's ethics office ensure that new entrant employees receive required initial ethics orientation? Check all that apply.

- Check attendance rosters **(52 agencies)**
- Check training evaluations **(7 agencies)**
- Check completion via training management system **(30 agencies)**
- Verify with Human Resources Office **(66 agencies)**
- Other (specify) **(76 agencies)**

3. Annual Ethics Training:

a) Number of employees who received annual ethics training (include all types of training):

	<i>Required to receive annual ethics training</i>	<i>Actually received annual ethics training</i>
Public filers (SF 278/OGE Form 278) - PAS	673	665
Public filers (SF 278/OGE Form 278) - non-PAS	23,657	22,918
Confidential filers (OGE Form 450)	302,906	292,292
Others	246,592	311,667
TOTAL	573,828	627,542

b) How does your agency's ethics office ensure that employees receive required annual ethics training? Check all that apply.

- Check attendance rosters **(97 agencies)**
- Check training evaluations (19 agencies)
- Check completion via training management system **(43 agencies)**
- Verify with Human Resources Office **(34 agencies)**
- Other (specify) **(65 agencies)**

4. Identify the topical areas on which ethics training was provided in 2010:

- 14 Principles of Ethical Conduct **(117 agencies)**
- Conflicting financial interests **(117 agencies)**
- Gifts **(116 agencies)**
- Post employment **(96 agencies)**
- Impartiality **(104 agencies)**
- Seeking employment **(94 agencies)**
- Misuse of position **(111 agencies)**
- Outside and representational activities **(107 agencies)**
- Other (specify) **(72 agencies)**

5. Which of the following training methods did your agency use for ethics training?
Check all that apply.
- Distribution of written materials **(107 agencies)**
 - Video presentation **(42 agencies)**
 - Satellite broadcast/videoconferencing **(28 agencies)**
 - Classroom instruction **(94 agencies)**
 - Individual briefings **(98 agencies)**
 - Computer/web-based training **(95 agencies)**
 - Other (specify) **(30 agencies)**
6. Which of the following training materials did your agency use for ethics training?
Check all that apply.
- Copies of the Standards of Conduct and/or agency supplemental regulations **(93 agencies)**
 - Summaries of the Standards of Conduct **(85 agencies)**
 - Pamphlets/brochures **(69 agencies)**
 - Newsletters **(38 agencies)**
 - Posters **(35 agencies)**
 - Case studies **(57 agencies)**
 - Videos **(41 agencies)**
 - Message from agency leadership **(56 agencies)**
 - Other (specify) **(53 agencies)**
7. Who produced the training materials checked above, in whole or in part? Check all that apply.
- My agency **(110 agencies)**
 - Other agency or outside organization **(46 agencies)**
 - OGE **(95 agencies)**
 - Other (specify) **(14 agencies)**
8. What specialized ethics training did your agency provide in 2010? Check all that apply.
- Contractor training **(18 agencies)**
 - Procurement Official training **(31 agencies)**
 - Supervisor training **(38 agencies)**
 - Financial disclosure training for reviewers **(24 agencies)**
 - Financial disclosure training for filers **(29 agencies)**
 - Other (specify) **(38 agencies)**
 - None **(54 agencies)**

ADDITIONAL COMMENTS FOR PART 3.

PART 4. ETHICS OPINIONS, ADVICE, AND COUNSELING

1. Use the following scale to rate the topics on the frequency with which your agency provided opinions, advice, and counseling.
 Frequency Scale: **1= Not at all 2= Rarely 3= Periodically 4= Frequently 5= Very Frequently**

	Frequency					Rank
	1	2	3	4	5	
Outside employment/activities	1	2	3	4	5	3
Post-employment restrictions	1	2	3	4	5	5
Conflicting financial interests	1	2	3	4	5	2
Awards	1	2	3	4	5	8
Impartiality in performance of official duties	1	2	3	4	5	6
Misuse of position, Government resources and information	1	2	3	4	5	7
Travel, subsistence, and related expenses from non-Federal sources	1	2	3	4	5	4
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	1	2	3	4	5	1

2. Who is authorized to provide written advice on the Standards of Conduct? Check all that apply.
If the General Counsel is also the DAEO, please mark both.
- DAEO/ADAEO/Deputies/Ethics Officials **(132 agencies)**
 - General Counsel/Staff Attorneys **(93 agencies)**
 - Regional Counsels **(19 agencies)**
 - Supervisors
 - Human Resources Staff **(0 agencies)**
 - Agency Head **(8 agencies)**
 - Other (specify) **(13 agencies)**
3. Who is authorized to provide written advice on the conflict of interest statutes? Check all that apply. **If the General Counsel is also the DAEO, please mark both.**
- DAEO/ADAEO/Deputies/Ethics Officials **(129 agencies)**
 - General Counsel/Staff Attorneys **(92 agencies)**
 - Regional Counsels **(17 agencies)**
 - Supervisors
 - Human Resources Staff **(0 agencies)**
 - Agency Head **(7 agencies)**
 - Other (specify) **(9 agencies)**

4. How does your agency's DAEO or headquarters ethics office ensure that accurate and consistent opinions, advice, and counseling are provided to employees? Check all that apply.
- Review all written opinions (**70 agencies**)
 - Review selected written opinions (**47 agencies**)
 - Discuss opinions with staff before providing final decision (**95 agencies**)
 - Review ethics officials' phone logs (**5 agencies**)
 - Conduct periodic discussions with staff (**78 agencies**)
 - Other (specify) (**48 agencies**)

ADDITIONAL COMMENTS FOR PART 4.

PART 5. ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL AND CIVIL STATUTES

1. Number of disciplinary actions taken based wholly or in part upon *violations of the standards of conduct provisions (5 CFR part 2635)*. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. **2711**
2. Number of disciplinary actions taken based wholly or in part upon *violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209*. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. **95**
 - a) Number of referrals the ethics office made to the Office of Inspector General of potential violations of the criminal conflict of interest statutes: **139**
 - b) Number of referrals the agency made to the Department of Justice of potential violations of the criminal conflict of interest statutes: **65**
 - c) Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes to the Department of Justice, including the U.S. Attorneys? Check all that apply.
 - DAEO/ADAEO (**79 agencies**)
 - General Counsel (**64 agencies**)
 - Agency Head (**23 agencies**)
 - IG (**65 agencies**)
 - Other (specify) (**12 agencies**)
 - d) Which office(s) are responsible for notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.
 - DAEO/ADAEO (**94 agencies**)

- General Counsel (**63 agencies**)
- Agency Head (**13 agencies**)
- IG (**43 agencies**)
- Other (specify) (**6 agencies**)

ADDITIONAL COMMENTS FOR PART 5.

PART 6. PUBLIC FINANCIAL DISCLOSURE

1. Report the number of public financial disclosure reports (SF 278/OGE Form 278) required to be filed in 2010, *excluding SGEs*, and the number of reports actually filed. Derive totals for required new entrant and termination reports from the number of appointments to and the number of terminations from positions during 2010. Some totals may include late filings actually received in 2011.

	Nominee/ New Entrant		Annual		Termination		Combination ³		TOTAL	
	Required	Filed	Required	Filed	Required	Filed	Required	Filed	Required	Filed
PAS ⁴	252	252	596	594	150	150	20	20	1018	1016
Non-Career SES ⁵	274	276	1164	1161	144	141	22	22	1604	1600
Career SES ⁵	1174	1155	9586	9535	836	806	181	179	11777	11675
Schedule C	448	448	1175	1155	262	251	30	29	1915	1883
Other ⁶	1294	1276	9629	9500	638	631	203	202	11764	11609
TOTAL	3442	3407	22150	21945	2030	1979	456	452	28078	27783

³ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

⁴ Presidential appointees confirmed by the Senate.

⁵ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁶ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc.

2. Does your agency have written procedures for following up with delinquent public financial disclosure (SF 278/OGE Form 278) filers? Yes (**77 agencies**) No (**55 agencies**) ; Blank (**2 agencies**)
3. Does your agency require an intermediate review by someone other than an ethics official for public financial disclosure reports (SF 278/OGE Form 278)? Yes (**33 agencies**) No (**100 agencies**); Blank (**1 agency**)
4. Does your agency provide public financial disclosure (SF 278/OGE Form 278) filers with feedback after their reports have been reviewed? Yes (**119 agencies**) No (**14 agencies**)
5. Does your agency use an electronic filing system for the public financial disclosure program?
 Yes (**52 agencies**) No (**82 agencies**)

If yes, which steps in the public financial disclosure program can be completed electronically?

Check all that apply.

- Filer electronically completes report (**49 agencies**)
- Filer electronically signs report (**23 agencies**)
- Filer electronically submits signed report for review (**28 agencies**)
- Certifier electronically reviews report (**24 agencies**)
- Certifier electronically signs report (**20 agencies**)
- System electronically stores certified report (with all signatures) (**24 agencies**)
- Other (specify) (**11 agencies**)

6. Number of Schedule C employees exempted from the public financial disclosure (SF 278/OGE Form 278) filing requirement by OGE: **71**
7. Number of public financial disclosure (SF 278/OGE Form 278) filers who requested filing extensions: **3363**
8. Number of public financial disclosure (SF 278/OGE Form 278) filers who were granted filing extensions: **3375**
9. Number of public financial disclosure (SF 278/OGE Form 278) filers who requested waivers of the late filing fee: **181**
10. Number of public financial disclosure (SF 278/OGE Form 278) filers who were granted waivers of the late filing fee: **164**
11. Number of public financial disclosure (SF 278/OGE Form 278) filers who paid the late filing fee: **60**
12. Number of requests your agency received for public release of public financial disclosure reports (SF 278/OGE Form 278): **367**
13. Number of individual public financial disclosure reports (SF 278/OGE Form 278) requested to be released: **2115**
14. Number of public financial disclosure (SF 278/OGE Form 278) filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2010: **1000**
15. Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure (SF 278/OGE Form 278) filers: **32**

ADDITIONAL COMMENTS FOR PART 6.

PART 7. CONFIDENTIAL FINANCIAL DISCLOSURE

1. Total number of confidential financial disclosure reports (OGE Form 450, OGE Form 450A, and OGE-approved alternative form) *required to be filed* by permanent full-time employees in 2010, excluding SGEs : **339,301**
2. Report the number of confidential financial disclosure reports (OGE Form 450, OGE Form 450A, and OGE-approved alternative form) *actually filed*.

	Confidential Financial Disclosure Reports Filed
OGE Form 450	222,398
OGE Form 450A	52,208
OGE-approved alternative form	62,750
TOTAL	337,352

3. Does your agency have written procedures for following up with delinquent confidential financial disclosure (OGE Form 450) filers? Yes (**77 agencies**) No (**56 agencies**); Blank (1 agency)
4. Does your agency require an intermediate review by someone other than an ethics official for confidential financial disclosure reports (OGE Form 450)? Yes (**37 agencies**) No (**95 agencies**); Blank (**2 agencies**)
5. Does your agency provide confidential financial disclosure (OGE Form 450) filers with feedback after their reports have been reviewed? Yes (**109 agencies**) No (**25 agencies**)
6. Does your agency use an electronic filing system for the confidential financial disclosure program? Yes (**49 agencies**) No (**85 agencies**)
 If yes, which steps in your confidential financial disclosure program can be completed electronically? Check all that apply.
 - Filer electronically completes report (**47 agencies**)
 - Filer electronically signs report (**25 agencies**)
 - Filer electronically submits signed report for review (**28 agencies**)
 - Certifier electronically reviews report (**22 agencies**)
 - Certifier electronically signs report (**20 agencies**)
 - System electronically stores certified report (with all signatures) (**23 agencies**)
 - Other (specify) (**8 agencies**)
7. Number of confidential financial disclosure (OGE Form 450) filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2010: **1930**
8. Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure (OGE Form 450) filers: **33**

ADDITIONAL COMMENTS PART 7.

PART 8. ADVISORY COMMITTEES/SPECIAL GOVERNMENT EMPLOYEES¹

1. Number of advisory committees (*do not include Federal Advisory Committees (FACA)*): **181**
2. Number of advisory committee members (*do not include FACA members*): **2302**
3. Number of FACA advisory committees: **885**
4. Number of FACA advisory committee members: **32,366**
5. Does your agency provide ethics program services for any boards or commissions that are independent of your agency?
 - Yes (**9 agencies**)
 - No (**120 agencies**)
 - Blank: (**5 agencies**)
6. Number of SGEs who were required to file financial disclosure reports in 2010. Include the number who actually filed.

	Confidential Reports (OGE Form 450)		Public Reports (SF 278/OGE Form 278)	
	Required	Filed	Required	Filed
Advisory Committee Members (FACA & non-FACA)	<u>23236</u>	<u>22908</u>	<u>32</u>	<u>33</u>
Experts/Consultants	<u>2668</u>	<u>1499</u>	<u>37</u>	<u>37</u>
Board Members	<u>444</u>	<u>439</u>	<u>70</u>	<u>70</u>
Commissioners	<u>76</u>	<u>74</u>	<u>12</u>	<u>4</u>
Other (specify):	<u>1549</u>	<u>1499</u>	<u>91</u>	<u>92</u>
TOTAL	<u>27973</u>	<u>26419</u>	<u>242</u>	<u>236</u>

¹ For purposes of this questionnaire, the term “special Government employee” (SGE) means an officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days. In addition to these officers and employees, the term includes:

- Part-time United States commissioners
- Part-time United States magistrates
- Independent counsels appointed under chapter 40 of title 28 and any person appointed by those independent counsels under section 594(c) of title 28, regardless of the number of days of appointment for either of these positions
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily

The terms “officer or employee” and “SGE” shall not include enlisted members of the Armed Forces.

7. Number of SGE filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2010. **1016**
8. Number of § 208(b)(1) waivers granted to SGEs? **17**
9. Number of § 208(b)(3) waivers granted to SGEs? **323**
10. Does your agency have written policies or procedures for designating SGE status?
 Yes (**23 agencies**) No (**46 agencies**) Not applicable (**58 agencies**); Blank (**7 agencies**)
11. With respect to SGEs who serve as committee members or on boards, is ethics training provided prior to attendance at their first committee or board meeting?
 Yes (**51 agencies**) No (**10 agencies**) Not applicable (**69 agencies**); Blank (**4 agencies**)

ADDITIONAL COMMENTS PART 8.

Provide a point of contact to answer OGE questions regarding this questionnaire:

Name: _____

Title/Position: _____

Email Address: _____

Phone Number: _____

ADDITIONAL QUESTIONNAIRE COMMENTS:



*United States
Office of Government Ethics*

2011 AGENCY ETHICS PROGRAM QUESTIONNAIRE

Executive branch agencies are required to submit an annual report to the United States Office of Government Ethics (OGE) concerning certain aspects of their ethics programs (Section 402(e)(1) of the Ethics in Government Act of 1978, as amended). The annual report must be filed with OGE on or before February 1 of each year (5 CFR § 2638.602(a)). This questionnaire serves as your annual report and is mandatory for headquarters locations. This year, submission of questionnaires for agency subcomponents is voluntary. Beginning next year, subcomponent annual reports will be mandatory.

Your responses to the questionnaire should reflect the 2011 calendar year (i.e., 1/1/2011 through 12/31/2011), except where specified. Throughout the questionnaire you will be offered an opportunity to provide comments. Please also use these sections to explain discrepancies between levels of required activity and actual activity. After OGE has reviewed your questionnaire submission, you may be contacted for follow-up.

If you have any questions, contact Karen Rigby, Lead Management Analyst, at 202-482-9212 or kstrigby@oge.gov.

SUBMISSION DEADLINE: FEBRUARY 1, 2012

PART 1. ORGANIZATION/RESOURCES

1. Agency: 134

2. Subcomponent (if applicable):

3. Number of full-time agency employees as of December 31, 2011 (*include employees detailed to another agency*): 4,796,668
4. Number of special Government employees¹ (SGE) as of December 31, 2011:
 29,849
5. Number of IPAs² (Intergovernmental Personnel Act) as of December 31, 2011:
 4,711

¹ For purposes of this questionnaire, the term "special Government employee" (SGE) means an officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days. The term "SGE" does not include enlisted members of the Armed Forces. It does, however, include these categories of officers or employees:

- Part-time United States commissioners
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily.

² The term "IPA" refers to employees appointed or detailed to positions under the Intergovernmental Personnel Act (5 U.S.C. §§ 3371-3376. Include the number of incoming appointments and outgoing details.

6. Name and title of the Designated Agency Ethics Official (DAEO):

a) Name: _____

b) Title: _____

c) Length of time the DAEO has held this position:

10 or more years **35 agencies (26%)**

5 - 9 years **31 agencies (23%)**

1 - 4 years **49 agencies (37%)**

Less than 1 year **17 agencies (13%)**

Position vacant **2 agencies (1%)**

d) Grade level of the DAEO: _____

e) Percent of the DAEO's time spent on ethics: **22 (average)** %

7. Name and title of the Alternate DAEO (ADAEO):

a) Name: _____

b) Title: _____

c) Length of time the ADAEO has held this position:

10 or more years **18 agencies (13%)**

5 - 9 years **41 agencies (31%)**

1 - 4 years **51 agencies (38%)**

Less than 1 year **15 agencies (11%)**

Position vacant **3 agencies (2%)**

No Response **6 agencies (4%)**

d) Grade level of the ADAEO: _____

e) Percent of the ADAEO's time spent on ethics: **32 (average)** %

8. Does your agency have a designated Deputy DAEO(s)? Yes (**57 agencies**) No (**75 agencies**) **2 agencies blank** (If no, skip to question 9.)

Name(s) and title(s) of designated Deputy DAEO(s):

9. Which of your agency's ethics officials have ethics duties as an element in their **position descriptions**? Check all that apply.

DAEO (**97 agencies**)

ADAEO (**85 agencies**)

Deputy DAEO(s) (**35 agencies**)

Other ethics official(s) (specify) **(48 agencies)** _____

None (**21 agencies**)

10. Which of your agency's ethics officials have ethics duties as an element in their **performance appraisals**? Check all that apply.

DAEO (**92 agencies**)

ADAEO (**80 agencies**)

Deputy DAEO(s) (**34 agencies**)

Other ethics official(s) (specify) (**47 agencies**) _____

None (**22 agencies**)

11. What type of training is provided to ethics officials to assist them in carrying out their ethics duties? Check all that apply.
- Training provided by OGE (**117 agencies**)
 - Structured training provided by your agency to groups of ethics officials (i.e., instructor-led training) (**29 agencies**)
 - One-on-one training provided by your agency (**69 agencies**)
 - Written education materials provided by your agency (**62 agencies**)
 - Multimedia training (e.g., videotaped or computer-based training) (**49 agencies**)
 - On-the-job training provided by your agency (**86 agencies**)
 - Other (specify) **35 agencies**
 - None **2 agencies**
12. Agency Ethics Program Structure:
- a) How would you describe the structure of your agency's ethics program? Check one.
- Ethics program management is conducted solely within the main ethics office. **99 agencies**
 - Ethics program management is distributed among multiple parts of the agency. **20 agencies**
 - Other (specify) **14 agencies**
1 agency blank
- b) What aspects of your ethics program are managed outside of the main ethics office? Check all that apply.
- Public financial disclosure program **11 agencies**
 - Confidential financial disclosure program **20 agencies**
 - Ethics advice and counseling **21 agencies**
 - Ethics education and training **18 agencies**
 - Assessment of program performance **8 agencies**
 - Other (specify) _____ **14 agencies**
 - None **102 agencies**
- c) Who does the DAEO report to regarding his/her ethics responsibilities?
- Agency Head **90 agencies**
 - General Counsel **20 agencies**
 - Human Resources Director **1 agency**
 - Other (specify) **22 agencies**
- d) Who manages the day-to-day functions of your agency's ethics program? Check all that apply.
- DAEO **89 agencies**
 - ADAEO **82 agencies**
 - Deputy DAEO(s) **34 agencies**
 - Program Manager(s) **10 agencies**
 - Other (specify) **30 agencies**

13. Number of ethics officials who worked in the ethics program in 2011 (Federal employees only; do not include contractors):

	Worked full-time on ethics	Worked part-time on ethics
HQ ethics officials	398	1275
Regional/field office ethics officials	173	4096

14. Are specific resources dedicated to the ethics program? Yes **61 agencies** No **72 agencies**
Blank **1 agency**

15. Do you need additional resources for the ethics program?
 Yes **29 agencies** No **104 agencies** Blank **1 agency** (If no, skip to Additional Comments for Part 1.)

If yes, please describe the additional resources you require. In addition, please describe how these resources would be used, e.g., if you require additional personnel, what functions would the additional personnel perform?

ADDITIONAL COMMENTS FOR PART 1. Please indicate the question number to which the comment corresponds.

PART 2. PROGRAM ADMINISTRATION

1. Use the following scale to rate the amount of time your agency spends to administer each item.
Time Spent Scale: 1= No time 2=Limited amount of time 3=Moderate amount of time 4=Considerable amount of time 5=Extreme amount of time

	Time Spent					RANK
Public financial disclosure program (OGE Form 278)	1	2	3	4	5	2
Confidential financial disclosure program (OGE Form 450)	1	2	3	4	5	1
Outside activity approval program	1	2	3	4	5	4
Written opinions and counseling	1	2	3	4	5	2
Education and training	1	2	3	4	5	3
Disciplinary process for violations	1	2	3	4	5	7
Special Government employee activities	1	2	3	4	5	5
Developing information technology applications for any aspect of the ethics program	1	2	3	4	5	6

2. Indicate the ethics program areas(s) for which your agency contracted with non-Government sources in 2011. Check all that apply.
- Initial ethics orientation **2 agencies**
 - Annual ethics training **5 agencies**
 - Public financial disclosure review (OGE Form 278) **6 agencies**
 - Confidential financial disclosure review (OGE Form 450) **5 agencies**
 - Program assessment/review **1 agency**
 - Advice and counseling =COUNTIF(Q2:Q135, "Prog Administration") **2 agencies**
 - Program administration (tracking systems, databases, etc.) **11 agencies**
 - Other (specify) **0**
 - None **107 agencies**
3. Did your agency conduct a self-assessment to evaluate any aspect of the ethics program in 2011? Yes **56 Agencies** No **77 Agencies** (If no, skip to question 4.)
- a) What was the purpose of the self-assessment? Check all that apply.
- Assess employee perceptions about the ethics program **22 agencies**
 - Assess employee knowledge of the ethics rules **22 agencies**
 - Assess employee perceptions about the agency's ethical culture **17 agencies**
 - Evaluate compliance with applicable ethics laws and regulations **36 agencies**
 - Assess employee knowledge before or after training **13 agencies**
 - Assess employee satisfaction with training offered **21 agencies**
 - Prepare for an OGE program review **26 agencies**
 - Other (specify) _____ **19 agencies**
- b) What mechanisms were used to conduct the self-assessment? Check all that apply.
- Internal Review/Audit **46 agencies**
 - Survey **20 agencies**
 - Focus Group/Interview **6 agencies**
 - Other (specify) _____ **23 agencies**
- c) What organization conducted the self-assessment? Check all that apply.
- Ethics Office **48 agencies**
 - Inspector General's Office **4 agencies**
 - General Counsel's Office **28 agencies**
 - Other (specify) _____ **14 agencies**
- d) If the self-assessment was conducted by other than the ethics office, was the ethics office provided feedback on the self-assessment? Check all that apply.
- Yes, written **15 agencies**
 - Yes, verbal **12 agencies**
 - No feedback provided **2 agencies**
 - Other (specify) _____ **8 agencies**_____

4. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2011? Check all that apply.
- Training **104 agencies**
 - Mentoring **81 agencies**
 - Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **46 agencies**
 - Individual development plans **35 agencies**
 - Written manuals/written standard operating procedures **75 agencies**
 - Knowledge library (Intranet, videos, shared drives) **75 agencies**
 - Competency/skills gap assessment **11 agencies**
 - Resources assessment (personnel and/or financial) **26 agencies**
 - Other (specify) **19 agencies**
 - None 11 agencies**

5. Does your agency use an automated system to track the administration of the financial disclosure program? Yes **52 agencies** Yes No **81 Agencies** **1 Agency Blank** (If no, skip to question 6.)

If yes, what functions does the automated system perform? Check all that apply.

- Notifies ethics officials of new entrant filers (if selected, skip question 6) **14 agencies**
- Maintains master list of filers **46 agencies**
- Sends notifications/reminders to filers **36 agencies**
- Distributes electronic copies of financial disclosure forms **34 agencies**
- Tracks receipt of completed report **48 agencies**
- Tracks date of initial review of report **44 agencies**
- Tracks status of report review **42 agencies**
- Tracks extensions **44 agencies**
- Tracks date of certification of report **48 agencies**
- Notifies filer of certification of report **25 agencies**
- Archives reviewer notes **37 agencies**
- Other (specify) **11 agencies** _____

6. How do you receive timely notification of new entrant employees required to file financial disclosure reports?

7. For which aspect(s) of your ethics program do you have written procedures? Check all that apply.
- Financial disclosure **112 agencies**
 - Training **91 agencies**
 - Opinion/advice/counsel **61 agencies**
 - Other (specify) **41 agencies** _____

8. List the most significant accomplishments in your ethics program in 2011.

9. List significant challenges or emerging issues in your ethics program.

ADDITIONAL COMMENTS FOR PART 2. Please indicate the question number to which the comment corresponds.

PART 3. EDUCATION AND TRAINING

1. Does your agency use an automated system to administer the ethics training program?
 Yes **52** No **82** (If no, skip to question 2.)

If yes, what functions does the automated system perform? Check all that apply.

- Provides a list of covered employees requiring annual ethics training **33**
- Provides a list of new employees requiring initial ethics orientation **25**
- Sends notifications to employees requiring ethics training **26**
- Sends reminders to employees requiring ethics training **27**
- Distributes electronic copies of training materials **16**
- Allows employees to access online training modules **39**
- Tracks training certifications **41**
- Archives training certifications **26**
- Other (specify) 6

2. Initial Ethics Orientation:

a) Number of employees **required to receive** initial ethics orientation in 2011: 189,497

b) Number of employees who **received** initial ethics orientation in 2011: 201,423

c) How often does your agency provide initial ethics orientation?

- Once a week **3**
- Every two weeks **25**
- Every 90 days **101**
- Other (specify) 0

d) How does your agency's ethics office ensure that new entrant employees receive required initial ethics orientation? Check all that apply.

- Check attendance rosters **55**
- Check training evaluations **5**
- Check completion via training management system **32**
- Verify with Human Resources Office **68**
- Other (specify) 73

3. Annual Ethics Training:

a) Number of employees who received annual ethics training in 2011 (include all types of training):

	<i>Required to receive annual ethics training</i>	<i>Received annual ethics training</i>
Public filers (OGE Form 278) - PAS	1046	840
Public filers (OGE Form 278) - non-PAS	23,341	21,201
Confidential filers (OGE Form 450)	315,047	295,058
Others	247,684	305,524
TOTAL	563,791	611,091

b) How does your agency's ethics office ensure that employees receive required annual ethics training? Check all that apply.

- Check attendance rosters **96**
- Check training evaluations **15**
- Check completion via training management system **45**
- Verify with Human Resources Office **34**
- Other (specify) _____ **62**

4. Identify the topical areas on which ethics training was provided in 2011:

- 14 Principles of Ethical Conduct **119**
- Conflicting financial interests **120**
- Gifts **117**
- Post employment **100**
- Impartiality **97**
- Seeking employment **95**
- Misuse of position **115**
- Outside and representational activities **103**
- Other (specify) _____ **71**

5. Which of the following training methods did your agency use for ethics training in 2011?

Check all that apply.

- Distribution of written materials **110**
- Video presentation **46**
- Satellite broadcast/videoconferencing **30**
- Classroom instruction **97**
- Individual briefings **96**
- Computer/web-based training **92**
- Other (specify) _____ **30**

6. Which of the following training materials did your agency use for ethics training in 2011? Check all that apply.
- Copies of the Standards of Conduct and/or agency supplemental regulations **93**
 - Summaries of the Standards of Conduct **87**
 - Pamphlets/brochures **76**
 - Newsletters **39**
 - Posters **37**
 - Case studies **44**
 - Videos **42**
 - Message from agency leadership **54**
 - Other (specify) _____ **65**_____
7. Who produced the training materials checked above, in whole or in part? Check all that apply.
- My agency **111**
 - Other agency or outside organization **38**
 - OGE **93**
 - Other (specify) _____ **18**_____
8. What specialized ethics training did your agency provide in 2011? Check all that apply.
- Contractor training **14**
 - Procurement Official training **25**
 - Supervisor training **33**
 - Financial disclosure training for reviewers **32**
 - Financial disclosure training for filers **41**
 - Other (specify) _____ **44**_____
 - None

ADDITIONAL COMMENTS FOR PART 3. Please indicate the question number to which the comment corresponds.

PART 4. ETHICS OPINIONS, ADVICE, AND COUNSELING

1. Use the following scale to rate the topics on the frequency with which your agency provided opinions, advice, and counseling.
 Frequency Scale: **1**= Not at all **2**= Rarely **3**= Periodically **4**= Frequently **5**= Very Frequently

	Frequency					
Outside employment/activities	1	2	3	4	5	2
Post-employment restrictions	1	2	3	4	5	5
Conflicting financial interests	1	2	3	4	5	3
Awards	1	2	3	4	5	8
Impartiality in performance of official duties	1	2	3	4	5	6
Misuse of position, Government resources and information	1	2	3	4	5	7
Travel, subsistence, and related expenses from non-Federal sources	1	2	3	4	5	4
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	1	2	3	4	5	1

2. Who is authorized to provide written advice on the Standards of Conduct? Check all that apply.
If the General Counsel is also the DAEO, please mark both.
- DAEO/ADAEO/Deputies/Ethics Officials **132**
 - General Counsel/Staff Attorneys **93**
 - Regional Counsels **18**
 - Supervisors **0**
 - Human Resources Staff **0**
 - Agency Head **9**
 - Other (specify) **14**
-
3. Who is authorized to provide written advice on the conflict of interest statutes? Check all that apply. **If the General Counsel is also the DAEO, please mark both.**
- DAEO/ADAEO/Deputies/Ethics Officials **131**
 - General Counsel/Staff Attorneys **93**
 - Regional Counsels **17**
 - Supervisors **0**
 - Human Resources Staff **0**
 - Agency Head **8**
 - Other (specify) **11**
-
4. How does your agency's DAEO or headquarters ethics office ensure that accurate and consistent opinions, advice, and counseling are provided to employees? Check all that apply.
- Review all written opinions **68**
 - Review selected written opinions **45**
 - Discuss opinions with staff before providing final decision **96**
 - Review ethics officials' phone logs **2**
 - Conduct periodic discussions with staff **83**
 - Other (specify) **55**
-
5. Are PAS employees provided post-employment counseling? Yes **83** No **42** (If no, skip to Additional Comments for Part 4.)

a) How is the counseling provided?

- Verbal **73**
- Written **1**
- Both **78**

b) When is the counseling provided?

- As requested by the employee **14**
- Routinely provided as part of the check-out process **56**
- Other (specify) 16

c) Please describe how PAS employees are made aware of the availability of post-employment counseling, e.g., employees are informed during initial ethics orientation or through periodic reminders.

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds.

PART 5. ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL AND CIVIL STATUTES

1. Number of disciplinary actions taken based wholly or in part upon *violations of the standards of conduct provisions (5 CFR part 2635)* in 2011. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents.

 2896

2. Number of disciplinary actions taken based wholly or in part upon *violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209* in 2011. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. 48

a) Number of referrals the ethics office made to the Office of Inspector General of potential violations of the criminal conflict of interest statutes in 2011: 140

b) Number of referrals the agency made to the Department of Justice of potential violations of the criminal conflict of interest statutes in 2011: 54

c) Which office(s) within your agency make referrals of potential violations of the criminal conflict of interest statutes to the Department of Justice, including the U.S. Attorneys?

Check all that apply.

- DAEO/ADAEO **76**
- General Counsel **64**
- Agency Head **22**
- IG **66**
- Other (specify) **16** _____

d) Which office(s) are responsible for notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.

- DAEO/ADAEO **96**
- General Counsel **63**
- Agency Head **14**
- IG **42**
- Other (specify) **9** _____

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds.

PART 6. PUBLIC FINANCIAL DISCLOSURE

1. Report the number of public financial disclosure reports (OGE Form 278) required to be filed in 2011, *excluding SGEs*, and the number of reports filed. Derive totals for required new entrant and termination reports from the number of appointments to and the number of terminations from positions during 2011. Some totals may include late filings received in 2012.

	Nominee/ New Entrant		Annual		Termination		Combination ³		TOTAL	
	Required	Filed	Required	Filed	Required	Filed	Required	Filed	Required	Filed
PAS ⁴	185	185	777	777	66	65	21	21	1049	1048
Non-Career SES ⁵	276	274	1732	1729	216	201	27	27	2251	2231
Career SES ⁵	1172	1164	9501	9447	800	777	204	205	11677	11593
Schedule C	338	336	1271	1264	264	254	48	46	1921	1901
Other ⁶	1624	1615	9065	8953	811	754	144	139	11644	11491
TOTAL	3595	3574	22346	22170	2157	2081	444	438	28542	28263

³ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

⁴ Presidential appointees confirmed by the Senate.

⁵ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁶ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc.

2. Does your agency have written procedures for following up with delinquent public financial disclosure (OGE Form 278) filers? Yes **86** No **48**
3. Does your agency require an intermediate review by someone other than an ethics official for public financial disclosure reports (OGE Form 278)? Yes **30** No **103**
4. Does your agency provide public financial disclosure (OGE Form 278) filers with feedback after their reports have been reviewed? Yes **118** No **16**
5. Does your agency use an electronic filing system for the public financial disclosure program?
 Yes **49** No **84** (If no, skip to question 6.)

If yes, which steps in the public financial disclosure program can be completed electronically?

Check all that apply.

- Filer electronically completes report **49**
- Filer electronically signs report **36**
- Filer electronically submits signed report for review **37**
- Certifier electronically reviews report **36**
- Certifier electronically signs report **34**
- System electronically stores certified report (with all signatures) **34**
- Other (specify) **12**

6. Number of Schedule C employees exempted from the public financial disclosure (OGE Form 278) filing requirement by OGE in 2011: **78**_____
7. Number of public financial disclosure (OGE Form 278) filers who requested filing extensions in 2011: **3491**

8. Number of public financial disclosure (OGE Form 278) filers who were granted filing extensions in 2011: 3538
9. Number of public financial disclosure (OGE Form 278) filers who requested waivers of the late filing fee in 2011: 159
10. Number of public financial disclosure (OGE Form 278) filers who were granted waivers of the late filing fee in 2011: 166
11. Number of public financial disclosure (OGE Form 278) filers who paid the late filing fee in 2011: 52
12. Number of requests your agency received for public release of public financial disclosure reports (OGE Form 278) in 2011: 515
13. Number of individual public financial disclosure reports (OGE Form 278) requested to be released in 2011: 5367
14. Number of public financial disclosure (OGE Form 278) filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2011: 771
15. Number of 18 U.S.C. § 208(b)(1) waivers granted to public financial disclosure (OGE Form 278) filers in 2011: 23

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds.

PART 7. CONFIDENTIAL FINANCIAL DISCLOSURE

1. Total number of confidential financial disclosure reports (OGE Form 450, OGE Form 450A, and OGE-approved alternative form) ***required to be filed*** by permanent full-time employees in 2011, excluding SGEs : _____
2. Report the number of confidential financial disclosure reports (OGE Form 450, OGE Form 450A, and OGE-approved alternative form) ***filed***.

	Confidential Financial Disclosure Reports Filed
OGE Form 450	321,683
OGE Form 450A	48,879
OGE-approved alternative form	71,291
TOTAL	342,862

3. Does your agency have written procedures for following up with delinquent confidential financial disclosure (OGE Form 450) filers? Yes **84** No **50**
4. Does your agency require an intermediate review by someone other than an ethics official for confidential financial disclosure reports (OGE Form 450)? Yes **36** No **96**
5. Does your agency provide confidential financial disclosure (OGE Form 450) filers with feedback after their reports have been reviewed? Yes **107** No **27**
6. Does your agency use an electronic filing system for the confidential financial disclosure program?
 Yes **50** No **83** (If no, skip to question 7.)

If yes, which steps in your confidential financial disclosure program can be completed electronically?

Check all that apply.

- Filer electronically completes report **48**
 - Filer electronically signs report **36**
 - Filer electronically submits signed report for review **38**
 - Certifier electronically reviews report **34**
 - Certifier electronically signs report **33**
 - System electronically stores certified report (with all signatures) **32**
 - Other (specify) _____ **12**
7. Number of confidential financial disclosure (OGE Form 450) filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2011: 2149
 8. Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure (OGE Form 450) filers in 2011: 50

ADDITIONAL COMMENTS PART 7. Please indicate the question number to which the comment corresponds.

PART 8. ADVISORY COMMITTEES/SPECIAL GOVERNMENT EMPLOYEES

1. Number of advisory committees (*do not include Federal Advisory Committees (FACA)*): 178
2. Number of advisory committee members (*do not include FACA members*): **2849**
3. Number of FACA advisory committees: 946
4. Number of FACA advisory committee members: 32602

5. Does your agency provide ethics program services for any boards or commissions that are independent of your agency?

Yes **9** (please provide the names of the boards and commissions)

No **121**

6. Number of SGEs* who were required to file financial disclosure reports in 2011. Include the number who filed.

	Confidential Reports (OGE Form 450)		Public Reports (OGE Form 278)	
	Required	Filed	Required	Filed
Advisory Committee Members (FACA & non-FACA)	21935	21629	38	38
1806	1806	1155	77	77
Board Members	288	277	70	69
Commissioners	121	120		
Other (specify):	1741	1733	105	105
TOTAL	25891	24914	290	289

* For the definition of SGEs, please see footnote 1.

7. Number of SGE filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2011. **881**

8. Number of § 208(b)(1) waivers granted to SGEs in 2011? **17**

9. Number of § 208(b)(3) waivers granted to SGEs in 2011? **312**

10. Does your agency have written policies or procedures for designating SGE status?
 Yes **27** No **40** Not applicable **65**

11. With respect to SGEs who serve as committee members or on boards, is ethics training provided prior to attendance at their first committee or board meeting?
 Yes **52** No **11** Not applicable **70**

ADDITIONAL COMMENTS PART 8. Please indicate the question number to which the comment corresponds.

Provide a point of contact to answer OGE questions regarding this questionnaire:

Name: _____

Title/Position: _____

Email Address: _____

Phone Number: _____

ADDITIONAL QUESTIONNAIRE COMMENTS:



2012 AGENCY ETHICS PROGRAM QUESTIONNAIRE

Executive branch agencies are required to submit an annual report to the United States Office of Government Ethics (OGE) concerning certain aspects of their ethics programs (Section 402(e)(1) of the Ethics in Government Act of 1978, as amended). The annual report must be filed with OGE on or before February 1 of each year (5 CFR § 2638.602(a)).

This year OGE has made several changes to the questionnaire: adding some questions and deleting others. These changes were made to reflect amendments to the Ethics in Government Act, to ease reporting of required information and to better match the current state of the executive branch ethics program.

This questionnaire serves as your annual report and is mandatory for headquarters locations. For purposes of this questionnaire, the answers provided should reflect your agency in total.

Your responses to the questionnaire should reflect the 2012 calendar year (i.e., 1/1/2012 through 12/31/2012), except where specified. Throughout the questionnaire you will be offered an opportunity to provide comments. Please also use these sections to explain discrepancies between levels of required activity and actual activity. After OGE has reviewed your questionnaire submission, you may be contacted for follow-up. For your convenience, a Word version of the entire questionnaire may be viewed and printed by clicking on the following link: [Word version of the 2012 Agency Ethics Program Questionnaire](#).

If you have any questions regarding the subject matter, contact Trish Zemple at pczemple@oge.gov. If you have technical questions regarding this on-line questionnaire, contact Kaneisha Cunningham at ktcunnin@oge.gov.

PART 1. ORGANIZATION/RESOURCES

1) Agency* 135

- () Access Board
- () Administrative Conference of the United States
- () Advisory Council on Historic Preservation
- () African Development Foundation
- () Agency for International Development
- () Alaska Natural Gas Transportation Projects
- () American Battle Monuments Commission
- () Appalachian Regional Commission
- () Appraisal Subcommittee
- () Arctic Research Commission
- () Armed Forces Retirement Home
- () Armed Services Board of Contract Appeals
- () Barry M. Goldwater Scholarship & Excellence in Education Foundation
- () Broadcasting Board of Governors
- () Central Intelligence Agency
- () Chemical Safety and Hazard Investigation Board
- () Christopher Columbus Fellowship
- () Commission for the Preservation of America's Heritage Abroad
- () Commission of Fine Arts
- () Commission on Civil Rights
- () Committee for Purchase from People Who Are Blind or Severely Disabled
- () Commodity Futures Trading Commission
- () Consumer Financial Protection Bureau
- () Consumer Product Safety Commission
- () Corporation for National and Community Service
- () Council of Economic Advisers
- () Council on Environmental Quality
- () Court Services & Offender Supervision Agency for DC
- () Defense Commissary Agency
- () Defense Contract Audit Agency

- () Defense Finance and Accounting Service
- () Defense Information Systems Agency
- () Defense Intelligence Agency
- () Defense Logistics Agency
- () Defense Nuclear Facilities Safety
- () Defense Security Service
- () Defense Threat Reduction Agency
- () Denali Commission
- () Department of Agriculture
- () Department of Commerce
- () Department of Defense
- () Department of Defense Office of the Inspector General
- () Department of Education
- () Department of Energy
- () Department of Health and Human Services
- () Department of Homeland Security
 - () Citizenship & Immigration Services
 - () Coast Guard
 - () Customs & Border Protection
 - () Federal Emergency Management Agency
 - () Federal Law Enforcement Training Center
 - () Immigration & Customs Enforcement
 - () Office of the Inspector General
 - () Transportation Security Administration
 - () Secret Service
- () Department of Housing and Urban Development
- () Department of Justice
- () Department of Labor
- () Department of State
- () Department of the Air Force
- () Department of the Army
- () Department of the Interior
- () Department of the Navy

- () Department of the Treasury
 - () Alcohol and Tobacco Tax and Trade Bureau
 - () Bureau of Engraving and Printing
 - () Bureau of Public Debt
 - () Bureau of the Mint
 - () Comptroller of the Currency
 - () Financial Crimes Enforcement Network
 - () Financial Management Service
 - () Inspector General for Tax Administration
 - () Internal Revenue Service
 - () Office of the Inspector General
 - () Special Inspector General for the Troubled Asset Relief Program
- () Department of Transportation
- () Department of Veterans Affairs
- () Election Assistance Commission
- () Environmental Protection Agency
- () Equal Employment Opportunity Commission
- () Export-Import Bank of the United States
- () Farm Credit Administration
- () Farm Credit System Insurance Corp.
- () Federal Communications Commission
- () Federal Deposit Insurance Corporation
- () Federal Election Commission
- () Federal Energy Regulatory Commission
- () Federal Housing Finance Agency
- () Federal Labor Relations Authority
- () Federal Maritime Commission
- () Federal Mediation and Conciliation Service
- () Federal Mine Safety & Health Review Commission
- () Federal Reserve Board
- () Federal Retirement Thrift Investment Board
- () Federal Trade Commission
- () General Services Administration

- () Harry S. Truman Scholarship Foundation
- () Institute of Museum and Library Services
- () Inter-American Foundation
- () International Boundary and Water Commission
- () International Joint Commission
- () International Trade Commission
- () James Madison Memorial Fellowship Foundation
- () Japan-US Friendship Commission
- () Marine Mammal Commission
- () Merit Systems Protection Board
- () Millennium Challenge Corporation
- () Morris K. Udall Foundation
- () National Aeronautics and Space Administration
- () National Archives and Records Administration
- () National Capital Planning Commission
- () National Credit Union Administration
- () National Endowment for the Arts
- () National Endowment for the Humanities
- () National Geospatial-Intelligence Agency (NGA)
- () National Labor Relations Board
- () National Mediation Board
- () National Science Foundation
- () National Security Agency
- () National Security Staff
- () National Transportation Safety Board
- () Nuclear Regulatory Commission
- () Nuclear Waste Technical Review Board
- () Occupational Safety and Health Review Commission
- () Office of Administration
- () Office of Government Ethics
- () Office of Management and Budget
- () Office of National Drug Control Policy
- () Office of Navajo and Hopi Indian Relocation

- () Office of Personnel Management
- () Office of Science and Technology Policy
- () Office of Special Counsel
- () Office of the Director of National Intelligence
- () Office of the US Trade Representative
- () Office of the Vice President
- () Overseas Private Investment Corporation
- () Peace Corps
- () Pension Benefit Guaranty Corporation
- () Postal Regulatory Commission
- () Presidio Trust
- () Railroad Retirement Board
- () Recovery Accountability and Transparency Board
- () Securities and Exchange Commission
- () Selective Service System
- () Small Business Administration
- () Social Security Administration
- () Special Inspector General for Afghanistan Reconstruction
- () Special Inspector General for Iraq Reconstruction
- () Surface Transportation Board
- () Tennessee Valley Authority
- () Uniformed Services University of the Health Sciences
- () US Postal Service
- () US Trade and Development Agency
- () Vietnam Education Foundation
- () White House

2) Subcomponent (if applicable)

DOJ, TREASURY, DHS Reports were combined for the summary report

3) Number of full-time agency employees as of December 31, 2012 (include employees detailed to another agency)* **4,651,770**

4) Number of special Government employees¹ (SGE) as of December 31, 2012* **20,148**

5) Number of IPAs² (Intergovernmental Personnel Act) as of December 31, 2012* **5,608**

¹ For purposes of this questionnaire, the term “special Government employee” (SGE) means an officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days. The term “SGE” does not include enlisted members of the Armed Forces. It does, however, include these categories of officers or employees:

- Part-time United States commissioners
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily.

² The term “IPA” refers to employees appointed or detailed to positions under the Intergovernmental Personnel Act (5 U.S.C. §§ 3371-3376. Include the number of incoming appointments and outgoing details.

6) Information about the DAEO and ADAEO*

	Position vacant		Name	Title	Time in this position (months and years)	Total years in executive branch ethics program	Grade level (e.g., GS, SES, EL)	Percent of time spent on ethics of December 31, 2012?	Is the DAEO/AD AEO eligible to retire as of December 31, 2012? ?		Is the DAEO/ADAEO?	
	Yes*	No*							Yes*	No*	career employee*	political appointee*
DAEO	[8] 5%	[127] 95%	--	--	---	---	---	[48]	[80]	[107]	[20] <u>[nes1]</u>	
ADAEO	[13] 10%	[122] 90%	--	--	---	---	---	[31]	[88]	[112]	[4] <u>[nes2]</u> [1]	

7) Number of Designated Deputy DAEO(s)* 733

8) Number of ethics officials who worked in the ethics program in 2012 (Do not include the DAEO, ADAEO, or contractors)*

	Worked full-time on ethics	Worked part-time on ethics	TOTAL
HQ ethics officials	385	1208	1593
Regional/field office ethics officials	183	3915	4098
TOTAL	568	5123	5691

9) Additional resources are needed for the ethics program.*

() Yes **25 (19%)**

() No **109 (81%)**

Please describe the additional resources needed.

1: Agency	2: Subcomponent (if applicable)	Please describe the additional resources needed.
Chemical Safety and Hazard Investigation Board		Moving to electronic system - this should help. Office has been reorganized. Prior resources are no longer available.
Commodity Futures Trading Commission		ethics specialists
Corporation for National and Community Service		Additional funding or expertise to develop training.
Court Services & Offender Supervision Agency for DC		More support for ethics training; and for OGE 450 review.
Defense Intelligence Agency		The DIA Ethics Program needs dedicated administrative and/or paralegal support. In 2011, we had received a billet authorization for a dedicated paralegal, conducted interviews, and made a selection for a paralegal to fill the billet, but the billet was reassigned to another office in the Agency prior to completing the hiring action. In light of current fiscal uncertainty, we are have not pursued additional staffing and are working diligently to accomplish our mission with the resources that we have available to us in our office.

<p>Defense Logistics Agency</p>		<p>Although not necessarily an additional resource to our program, better availability of OGE courses, especially during this time of fiscal constraints, would be very helpful for initial and continuing training for out ethics counselors.</p>
<p>Department of Agriculture</p>		<p>The major challenge facing USDA's Office of Ethics (OE) is a serious lack of resources and staffing. As noted in the OGE program review, USDA's ethics program has not recovered from prior staff reductions and a bare bones budget. In the short time since OGE's program review was issued in November 2012, three additional key ethics staff have left USDA, including two senior level attorneys. These departures further reduce USDA's Ethics Program from 31 FTEs in 2009 (which was itself a reduction from the 36 FTEs allocated in 2008) to a current total of 24 staff for the Department's ethics program. Moreover, due to current budgetary constraints, the Office of Ethics does not have the ability to rehire to fill these vacancies. This means that OE's staffing has been reduced to a total of 24 serving an agency of over 110,000, while facing new responsibilities mandated by the STOCK Act. Without the ability to recruit or retain skilled and experienced staff, USDA's ethics program faces its greatest challenge: to do more with much less.</p>
<p>Department of Health and Human Services</p>		<p>Additional ethics staff to service increased agency personnel, process data collected, manage electronic financial disclosure system, and provide ethics oversight. Develop an electronic filing system for outside activities.</p>

Department of Homeland Security	U.S. Customs and Border Protection	Certainly, additional resources would allow the agency to provide enhanced services in the ethics area.
Department of Homeland Security	U.S. Coast Guard	
Department of Homeland Security		An attorney to fill a vacant position.
Department of Homeland Security	Immigration and Customs Enforcement	Two ethics attorneys left employment with ICE during calendar year 2012, leaving only three ethics officials for the entire agency. We hope to backfill these two positions in order to maintain the proper sustained work flow for this high volume and increasing practice.
Department of Justice		Easier access to OGE training for ethics officials; additional ethics official training needed for Form 278 and Form 450 review.
Department of Justice	Executive Office for United States Attorneys	Additional management analyst to review OGE 278 and OGE 278-T reports.
Department of Justice	Drug Enforcement Administration	Federal position- ethics paralegal; electronic financial disclosure system; database to track new entrant OGE Form 450 filers
Department of Justice	Criminal Division	The Criminal Division needs an ADDAEO as well as an additional part-time person to begin training to become an ethics advisor. Administrative support is also needed so that the DDAEO can focus on substantive ethics work rather than ministerial tasks.

Department of the Air Force		We are faced with balancing fiscal reductions against an increasing number of program requirements (e.g. implementation of the STOCK Act). Additional manpower would be beneficial to better manage the volume of both administrative and substantive work. This continues to include administrative/contract support to assist in further development of tracking and monitoring tools for management and oversight, as well as focused resources for further development of training material and web presence for the field.
Department of the Army		Additional resources are needed to: 1) Provide ethics advice and training; 2) review/certify financial disclosure reports more timely; 3) Keep filer lists and other tracking/reporting materials updated; and 4) implement provisions of the STOCK Act.
Department of the Interior		Additional funds for training, travel and additional Assistant Ethics Counselors.
Environmental Protection Agency		EPA has only 3 FTE to oversee its entire ethics program. We therefore leverage use of deputy ethics officials and other resources. We could always use more resources, particularly as evidenced in 2012, when we faced both a presidential election year and the STOCK Act.
Export-Import Bank of the United States	N/A	Need additional personnel and automated systems
International Boundary and Water Commission		Personnel and funding.
International Joint Commission		Training materials

International Trade Commission		An assistant to the ADAEO who can devote a regular number of hours to the ethics program. We need someone who can be trained to ultimately take the ADAEO position upon the expected retirement of the ADAEO in three years.
National Labor Relations Board		The NLRB will be reorganizing its ethics program in 2013 and moving it from the Division of Administration to the Division of Legal Counsel and combining it with its Legal Ethics Program. With the move, additional full-time staff will be hired to assist in the management of the NLRB's Ethics Program. It is expected that 3 additional staff members will be recruited to improve the program as well as replace employees who have departed.
National Science Foundation		Ethics program assistants or contractor; Training funds; Dedicated IT Support for computer-based training and eFile
National Security Agency		An electronic financial disclosure system - like Army's FDM.
National Transportation Safety Board		Right now we have an "ethics paralegal" who spends about 65% of her time on ethics matters. If possible, an equivalent of 80% of paralegal time would be useful. It would be very helpful to the ethics program to devote about half of an about-to-be hired attorney's time (or equivalent across the office) to ethics matters. The agency's General Counsel has supported our efforts. We are also engaged in creation of electronic databases that will make us more efficient; continuing support in that effort will be useful and has been offered.
Office of National Drug Control Policy		Advanced training for ethics officials; STOCK Act compliance training; Staff for periodic large vetting projects.
Office of Science and Technology Policy		It would be helpful to have a backup.

Office of Special Counsel		Additional staff is needed in the Office of General Counsel (OGC), which is where the ethics program is housed. The addition of the General Counsel (anticipated in early 2013) will return OGC to a full complement of attorneys in 2013, which will allow for a better balance between the attorneys'™ program duties and ethics duties.
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10) Identify the agency ethics officials that have ethics duties as an element in their position_descriptions. Check all that apply.*

- DAEO 104
- ADAEO 92
- All Deputy DAEO(s) 27
- Some Deputy DAEOs 16
- None 21

11) Identify the agency ethics officials that have ethics duties as an element in their performance appraisals. Check all that apply.*

- DAEO 95
- ADAEO 82
- All Deputy DAEO(s) 33
- Some Deputy DAEOs 14
- None 26

12) Check the box that most closely describes the structure of your agency's ethics program.*

() Ethics program management is conducted solely within the main ethics office. **90 (67%)**

() Ethics program management is delegated among multiple parts of the agency. **21 (16%)**

() Other (specify): _____ * **24 (17%)**

1: Agency	2: Subcomponent (if applicable)	12: Other (specify): Check the box that most closely describes the structure of your agency's ethics program.
Agency for International Development		Ethics program is conducted chiefly within the main ethics office. In cooperation with the main ethics office, the Regional Legal Advisors are responsible for conducting ethics training, providing ethics advice, and reviewing OGE-450's at the overseas missions.
Alaska Natural Gas Transportation Projects		The ethics program is managed in the Office of Administration.
Arctic Research Commission		we're two people...we follow OGE rules, procedures and practices
Barry M. Goldwater Scholarship & Excellence in Education Foundation		Cooperative Structure in 2-person micro-agency
Consumer Product Safety Commission		Ethics program management is conducted solely within the General Law Division of hte agency's Office of General Counsel
Denali Commission		by MOU with FAA for legal services
Department of Energy		Ethics program is centralized but field counsels delegated responsibilities
Department of Homeland Security	Office of Inspector General	The OIG ethics program is operated solely within the OIG Office of Counsel.
Department of Justice	United States Parole Commission	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.

Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.
Department of Justice	Foreign Claims Settlement Commission	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.
Department of Justice	Civil Division	In addition to the DDAEOs, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.
Department of Justice	Federal Bureau of Prisons	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.
Department of Justice	Civil Rights Division	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	United States Trustee Program	In addition to the DDAEO, the Departmental Ethics Office in the Justice management Division (JMD) oversees teh Department-wide ethics program.
Department of Justice	Environment and Natural Resources Division	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.

Department of Justice		In addition to DDAEOs in many of DOJ's components, the Departmental Ethics Office in the Justice Management Division (JMD) oversees the Department-wide ethics program.
Department of Justice	Executive Office for United States Attorneys	In addition to the DDAEOs, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Federal Bureau of Investigation	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Tax Division	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Office of the Pardon Attorney	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	United States Marshals Service	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.

Department of Justice	Drug Enforcement Administration	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Criminal Division	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Antitrust Division	In addition to the DDAEO, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	United States Trustee Program	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of Justice	Community Relations Service	In addition to DDAEOs, the Departmental Ethics Office in the Justice Management Division oversees the Department-wide ethics program.
Department of State		Invitational Travel, some financial disclosure
Department of the Treasury	Inspector General for Tax Administration	Office of Chief Counsel - program management. Human Capital - support

Department of the Treasury	Comptroller of the Currency	Handled by legal staff at HQ and in districts.
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	For Questions 6-14, See Treasury DO Questionnaire
Department of the Treasury	Financial Management Service	Ethics Program is located in the Chief Counsel's office
Department of the Treasury	Financial Crimes Enforcement Network	As a Treasury Department bureau, FinCEN receives instruction and guidance from the Department, but management of the FinCEN Ethics Program is generally within the Office of Chief Counsel.
Department of Veterans Affairs		Centralized to DAEO within OGC
Farm Credit Administration	N/A	Ethics program conducted in OGC.
Farm Credit System Insurance Corp.	N/a	Ethics program in OGC

Federal Mine Safety & Health Review Commission		Ethics program management is conducted within OGC
James Madison Memorial Fellowship Foundation		small agency - ethics program is run in conjunction with regular office duties
Morris K. Udall Foundation		As a micro-agency, we are not large enough to have a dedicated ethics office.
National Aeronautics and Space Administration		Ethics program management is substantially delegated to local NASA legal offices with some program management functions retained at HQ.
National Labor Relations Board		Office of the Director, Division of Administration
Nuclear Waste Technical Review Board		Micro-agency - ethics program managed by Dir of Admin
Office of Management and Budget		Ethics program management is conducted solely within generalist Office of General Counsel, with responsibility localized in the General Counsel, to whom the DAEO and ADAEO report.

Office of the Vice President		See comments for Part 1.
Peace Corps	NA	Ethics program Management is conducted solely within the Office of the General Counsel.
Presidio Trust		The ethics program is managed by the Director of Human Resources who reports directly the Executive Director
Vietnam Education Foundation		It is conducted by the DAEO

13) If ethics program management has been delegated, indicate which elements have been delegated. Check all that apply.*

Public financial disclosure program **12**

Confidential financial disclosure program **25**

Ethics advice and counseling **25**

Ethics education and training **20**

Assessment of program performance **9**

Other **17**

None **96**

1: Agency	2: Subcomponent (if applicable)	13: Other: If ethics program management has been delegated, indicate which elements have been delegated. Check all that apply.
Access Board		Not delegated
Agency for International Development		These aspects of the ethics program are managed by the main ethics office with assistance from the Regional Legal Advisors and administrative staff at the Agency's overseas missions.

Chemical Safety and Hazard Investigation Board		Assistance on issues is obtained on an as needed basis.
Consumer Financial Protection Bureau		Final certification of confidential financial disclosure reports, acceptance of nonfederal sources of travel and gifts, and designation of positions as confidential financial disclosure filers
Defense Contract Audit Agency		initial review of 450s, certification is done at the HQ level
Department of Health and Human Services		The OGC Ethics Division (main ethics office) supervises and manages all of the above matters.
Department of Justice	United States Parole Commission	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Foreign Claims Settlement Commission	The DDAEO manages the function of the ethics program within their component; DEO oversees the overall DOJ ethics program.

Department of Justice	Civil Division	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Federal Bureau of Prisons	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Civil Rights Division	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	United States Trustee Program	The DDAEO manages the functions of hte ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Environment and Natural Resources Division	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice		DDAEOs manage the functions of the ethics programs within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Executive Office for United States Attorneys	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Federal Bureau of Investigation	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.

Department of Justice	Office for Justice Programs and Office on Violence Against Women	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Tax Division	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Office of the Pardon Attorney	The DDAEO manages the functions of the ethics program within their component. DEO oversees the overall DOJ ethics program.
Department of Justice	United States Marshals Service	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Drug Enforcement Administration	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.
Department of Justice	Criminal Division	The DDAEO manages the functions of the ethics program within the component; DEO oversees the overall DOJ ethics program.
Department of Justice	Antitrust Division	
Department of Justice	United States Trustee Program	The DDAEO manages the functions of the ethics program within their component, DEO oversees the overall DOJ ethics program.
Department of Justice	Community Relations Service	The DDAEO manages the functions of the ethics program within their component; DEO oversees the overall DOJ ethics program.

Department of State		see Question # 12
Department of the Interior		Non-federal travel assistance & WAG approvals
Department of the Navy		
Department of the Treasury		Main Treasury mananages all aspects for its program; bureaus manage their own programs but report to DAEO
Department of the Treasury	Inspector General for Tax Administration	Human Capital provides notification of hiring, covered position changes, etc.
Department of the Treasury	Bureau of Public Debt	Initial Ethics Orientation, Preparation of 1353 Travel Reports (if any)
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	See Treasury DO
Department of Transportation		Each Operating Admin and OST manages its own ethics program with oversight from the DAEO
Equal Employment Opportunity Commission		Outside employment approvals and disapprovals
Millennium Challenge Corporation		Ethics Program Officer handle duties above

Office of Navajo and Hopi Indian Relocation		Ethics program has not been delegated
Office of Special Counsel		initial ethics orientation
Office of the Vice President		See comments for Part 1.
Presidio Trust		The ethics program has not been delegated
Surface Transportation Board		All duties delegated except for assessment and those that are non-delegable

14) In the past year, the DAEO has reported directly to the agency head about the status of the ethics program.*

Yes **117**

No **18**

15) Have ethics officials received ethics training in 2012?*

Yes **115 (85%)**

No **20 (15%)**

Indicate the training provided to ethics officials to assist them in carrying out their ethics duties. Check all that apply.*

- Training provided by OGE **92**
- Structured training provided by your agency to groups of ethics officials (i.e., instructor-led training) **32**
- One-on-one training provided by your agency **57**
- Written education materials provided by your agency **57**
- Multimedia training (e.g., videotaped or computer-based training) **50**
- On-the-job training provided by your agency **75**
- Other **21**
- None **0**

1: Agency	2: Subcomponent (if applicable)	Other: Indicate the training provided to ethics officials to assist them in carrying out their ethics duties. Check all that apply.
African Development Foundation		Ethics official from GSA; Attorney from OSC -- Hatch Act.
Defense Contract Audit Agency		DoD teleconference, and CLE
Defense Logistics Agency		Ethics detail to the White House
Defense Security Service		Training provided by the U.S. Army Judge Advocate General's Legal Center and School
Defense Threat Reduction Agency	N/A	Computer-based training

<p>Department of Health and Human Services</p>		<p>HATCH Act updates; Enhancing Critical Skills for Ethics Officials; Quarterly Meetings; and Annual Workshop conducted by the OGC Ethics Division.</p>
<p>Department of Homeland Security</p>	<p>Immigration and Customs Enforcement</p>	<p>Training provided at Interagency Ethics Counsel meetings.</p>
<p>Department of Housing and Urban Development</p>	<p>HUD Office of Inspector General (OIG) in effect as of 9 5 2012</p>	<p>One ethics attorney attended the annual COGEL conference</p>
<p>Department of Justice</p>	<p>Bureau of Alcohol, Tobacco, Firearms and Explosives</p>	<p>Self-paced, web-based</p>
<p>Department of Justice</p>		<p>Brown bag ethics lunches for ethics officials twice per month.</p>

Department of Justice	United States Marshals Service	mentoring, issue-specific training
Department of Justice	Drug Enforcement Administration	IEC Meetings
Department of Justice	Criminal Division	Bi-monthly meetings at Departmental Ethics Office to discuss ethics issues.
Department of Justice	Antitrust Division	Brown bag ethics lunches twice monthly
Department of Justice	Community Relations Service	General ethics training for federal employees
Department of the Treasury	Comptroller of the Currency	training via quarterly ethics meeting/conference calls.
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	Professional Reading
Department of the Treasury	Financial Crimes Enforcement Network	Ethics official have participated in training provided by another ethics official as the instructor. Additionally, we attend the Interagency Ethics Counsel Meetings and Treasury Ethics Counsel Meetings.
Federal Communications Commission		IEC
International Boundary and		ECOA Conference in St. Louis

Water Commission		
Millennium Challenge Corporation		Special Counsel's Office - Hatch Act Training
National Aeronautics and Space Administration		Monthly agency ethics teleconferences where specific ethics topics are discussed and our face-to-face ethics meeting in February 2012
National Transportation Safety Board		OGE webinars; Inter-agency Ethics Counsel luncheons/presentations.
Occupational Safety and Health Review Commission		Received training at ABA Admin Law Conference
Office of Administration		IEC meetings
Office of the Director of National Intelligence		Detail to White House

Office of the Vice President		See comments for Part 1.
Pension Benefit Guaranty Corporation		CLE training conducted by PLI
Presidio Trust		Mentoring by DAEO

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 1. Please indicate the question number to which the comment corresponds.
Advisory Council on Historic Preservation	N/A	Question 4: Last year we reported 20 SGEs. During our audit with OGE in 2012, we realized that we had been over-reporting this number. We had been incorrectly including full-time federal employees from other agencies, who serve on our agency's board intermittently, in the SGE count for the annual reports. While they definitely work less than 130 days out of a 365 day period in our agency's board, they are full-time employees at their home agencies and therefore not SGEs. The correct count of SGEs on our board as of December 31, 2012 is ten (10). Question 6: In previous years, we have

		answered the question about “time in this position” assuming that “this position” meant the DAEO or ADAEO position, rather than our main position at our agency. The verbiage in the report has changed and now we are assuming “this position” refers to our main position at our agency (e.g., in my case, the associate general counsel position, rather than the DAEO position). That explains some discrepancies in time periods reported between past reports and this one.
Alaska Natural Gas Transportation Projects		The DAEO position is vacant. The ADAEO has taken responsibilities normally assigned to the DAEO. Additionally, the ADAEO reports directly to the agency head about the status of the ethics program.
Appraisal Subcommittee		15. While ADAEO has tried to take the beginners course for Ethics Personnel at OGE, the course has been continually waitlisted. ADAEO has gone onto OGE website for Ethics information so I don't know if that qualifies for training or not.
Arctic Research Commission		pls remember...we're two civil servants working for 7 presidentially appointed commissioners who are considered by OGE to be "government representatives." They aren't govt. employees or SGEs.
Armed Services Board of Contract Appeals		DAEO and ADAEO completed the same annual ethics training that all other ASBCA employees completed in 2012.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Commission on Civil Rights	n/a	#14 The DAEO position is vacant..

Consumer Financial Protection Bureau		Questions 7-11: Full-time deputy ethics officials in HQ include two Senior Counsel and one Ethics Program Manager. Each has ethics duties in their position description and performance plans.
Consumer Product Safety Commission		Question 6 - Cheryl A. Falvey, the former DAEO, left the agency on September 21, 2012. The new DAEO, Stephanie Tsacoumis, started on December 10, 2012. Question 14 - All of the ethics officials have ethics duties in their position descriptions. However, they are not designated as "Deputy DAEOS."
Defense Intelligence Agency		With respect to questions 12 and 13, above, the main ethics office manages all aspects of the program, but delegates certain responsibilities to Deputy DAEOs. For example, Deputy DAEOs assist with review and certification of financial disclosures, as well as answering routine ethics questions.
Defense Threat Reduction Agency	N/A	#14 The DAEO reports to the DoD General Counsel regarding his ethics responsibilities.
Department of Defense Office of the Inspector General	Office of General Counsel	Question 6. We presume "ADAEO" refers to the Alternate Agency Ethics Official. See 5 CFR 2638.202. Question 7. We presume "Designated Deputy DAEO" refers to the Alternate Agency Ethics Official. See 5 CFR 2638.202. Question 10. We presume "Deputy DAEO(s)" refers to Deputy Ethics Officials. See 5 CFR 2638.202.
Department of Health and Human Services		Q10 – In addition to the DAEO & ADAEO, Deputy Ethics Counselors (DECs), Ethics Attorneys, and Ethics Specialists have ethics duties in their position descriptions. Q11 – In addition to the DAEO & ADAEO, DECs have ethics duties in their performance appraisals and the DAEO provides input to DECs' rating officials. Also, Ethics Attorneys and Ethics Specialists have ethics duties in their performance appraisals. Q12 - For the agency, it is managed by the Deputy Associate General

		<p>Counsel for Ethics Education and Program Review. DECs and their Ethics Coordinators (ECs) oversee the functions within their respective divisions. The DECs have staffs that run the day to day operation of that division’s ethics program.</p>
<p>Department of Homeland Security</p>	<p>U.S. Customs and Border Protection</p>	<p>10. The Chief Counsel and Deputy Chief Counsel's position descriptions both state "...serves as a member of the Commissioner of Customs' executive staff and is a Deputy Ethics Official and serves as the Ethics Officer for the Customs Service." In addition, the position description of the Associate Chief Counsel (Ethics, Labor & Employment) states "...serves as the principal legal advisor to CBP headquarters on all matters relating to the areas of Ethics, Labor and Employment" and "provides overall advice, such as: advising CBP Officers about the application of federal personnel laws; advising and training CBP Officers on the requirements of the Ethics in Government Act." 11. None of the performance appraisals have ethics duties as an element of the appraisal other than to say things like "...deals with others in a highly diplomatic, cooperative and ethical manner...." Also, per the DHS SES Performance Agreement, a core competency is "1.1 Principled - adheres to the highest ethical standards of public service and promotes a culture of integrity within DHS." 12. The Agency ethics program is primarily conducted by the Office of Chief Counsel, and this responsibility has been delegated to our regional Associate Chief Counsels. The OGE 450 program is administered jointly by Chief Counsel and Human Resources Management (HRM). Training is conducted by Chief Counsel at HQ and regionally, and some training is provided by online resources such as USDA and Ethicsburg.</p>

<p>Department of Homeland Security</p>	<p>Secret Service</p>	<p>Question 14: The DAEO is Department-level, and we have no knowledge of this information.</p>
<p>Department of Homeland Security</p>	<p>Transportation Security Administration</p>	<p>Q.8: The total number of Full-time and Part-time HQ Ethics officials includes 1 employee who left the agency mid-2012, 1 employee that was no longer performing ethics duties mid-2012; and 2 employees that received their Ethics duties delegations in August of 2012.</p>
<p>Department of Homeland Security</p>	<p>Immigration and Customs Enforcement</p>	<p>14. We have no DAEO in this DHS component; the DAEO and ADAEO are both at DHS (our higher headquarters).</p>
<p>Department of Homeland Security</p>	<p>Federal Emergency Management Agency</p>	<p>#12 - We have dedicated Ethics Staff at HQs as well as Adjunct Ethics Counselors that provide advice and counsel to individual Program, Regional, and Field offices.</p>
<p>Department of Housing and Urban Development</p>	<p>HUD Office of Inspector General (OIG) in effect as of 9 5 2012</p>	<p>Question 4: The number of SGEs varies from year to year based on the Office of the Secretary's management decisions (2010 = 12 SGE's; 2011= 6; 2012 = 10). They do not provide our office with the reasons behind their hiring decisions of SGEs. Question 8: The reason the number of ethics officials in the regions increased dramatically in 2012 was because of a re-organization in the regions last October, which resulted in more regional attorney positions having ethics duties on a part time basis. Question 10/11: The following positions also have ethics in their position descriptions/performance appraisals: Associate General Counsel for Ethics, Assistant Gen. Counsel for Ethics, Deputy Asst. Gen. Counsel for Ethics, 4 HQ ethics staff attorneys, 2 HQ ethics program managers, all 10 Regional Counsels and 10 Deputy Regional Counsels, and litigation staff attorneys in regional offices (as of 10/1/2012, a re-organization in the regions resulted in twice as many attorneys with ethics in their PDs/PAs, thus</p>

		the entry of 46). The OIG sub-component has ethics in 4 PDs/PAs: the General Counsel, Deputy General Counsel, a senior attorney and a staff attorney.
Department of Justice	Foreign Claims Settlement Commission	6. Both the DAEO and the ADAEO have met minimum requirements for retirement eligibility.
Department of Justice	United States Trustee Program	6. Both the DAEO and ADAEO have met minimum requirements for retirement eligibility.
Department of Justice	Environment and Natural Resources Division	Q 6: Both the DAEO and ADAEO have met minimum requirements for retirement eligibility.
Department of Justice		7. There are 32 DDAEOs serving in all of DOJ's Components, Bureaus and Divisions, and in most of its Offices; 31 are attorneys, and 1 is the Component's Executive Officer. In addition to the DDAEOs, the Departmental Ethics Office (DEO) in the Justice Management Division (JMD) oversees the Department-wide ethics program and provides direct advice to DOJ's senior leadership offices, to JMD, and to certain of the Department's smaller offices. DEO's programmatic functions include issuance of Department-wide guidance, providing ethics information, advice and counsel to the DDAEOs, preparation of training materials for use or adaptation by the DDAEOs, delivery of ethics training, and retention of ethics documents including Pledges and certain financial disclosure reports. 10. and 11. The position descriptions and appraisals of the DAEO and ADAEO are undergoing revision. The revised versions will include their ethics duties.

Department of Justice	Executive Office for United States Attorneys	Q 6: Both the DAEO and ADAEO have met minimum requirements for retirement eligibility.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	Q 20: The Department of Justice's ethics office provided substantial training to its divisions on the new procedures for the Public Financial Disclosure Reports.
Department of Justice	Office of the Pardon Attorney	Both the DAEO and ADAEO have met minimum requirements for retirement eligibility.
Department of Justice	United States Marshals Service	Q 6: Both the DAEO and ADAEO have met minimum requirements for retirement eligibility.
Department of Justice	Drug Enforcement Administration	13. Because of the historical high turnover we have had with contract paralegals, funding for a Federal position would add stability to the Agency's ethics program, because it takes approximately 6 months to train the paralegal to competently perform all of the position's duties.
Department of Labor		#22 - A new hire to ethics division
Department of State		Invitational Travel approval has been delegated to bureau level Executive Directors. Overseas, the Management Officer has the same authority. Often times the MO will contact the Ethics Office prior to a decision. The Executive Directors and Management Officers are responsible for ensuring all employees designated to submit a report do so in a timely manner, as well as ensuring Ethics Training has been completed.

<p>Department of the Air Force</p>		<p>Question 3. This is a comprehensive number reflecting total force including Air Force Reserve and Air National Guard employees. Question 4. This number reflects civilian SGEs. We have not included a separate breakout for Reserve or Guard SGEs, but included the total guard and reserve numbers in the answer to question 3. Question 12: Our program is centrally managed but functionally executed in the field.</p>
<p>Department of the Army</p>		<p>Q3 - Full-time Army employees includes active duty military, Government civilian employees, US Army Reserve, and Army National Guard. Although enlisted personnel are excluded from the definition of employee (5 CFR 2635.1020), the Joint Ethics Regulation, DoD 5500-R, 1-211, includes enlisted personnel as employees.</p>
<p>Department of the Treasury</p>		<p>Question 4. Decrease in SGE from last year's number to this year's depending on projects and if their service is needed. Question 7. Each bureau chief or legal counsel is a designated Deputy DAEO. Question 8. Ethics official totals do not include DAEO & ADAEO. Question 10-11. Ethics Attorneys, Program Manager, and Ethics Program Specialist all have ethics duties in their position descriptions and performance appraisals.</p>
<p>Department of the Treasury</p>	<p>Inspector General for Tax Administration</p>	<p>For all questions about the DAEO and ADAEO, please reference Department of Treasury/Main Treasury questionnaire.</p>
<p>Department of the Treasury</p>	<p>Bureau of the Mint</p>	<p>Q #4 - the United States Mint indicated that we had 11 special government employees as of December 31, 2012, then we indicated on Question #59 that 12 OGE Form 450 reports from SGEs were required to be filed in 2012. The United States Mint received the one new entrant confidential filer form in 2013, instead of 2012.</p>

Department of the Treasury	Bureau of Public Debt	15. The Treasury Department put out an ethics Handbook. Also, the Treasury Department holds Quarterly Meetings with the Ethics Officials. There were several Stock Act discussions. We also attended the web-based OMB Max training.
Department of the Treasury	Comptroller of the Currency	For questions 6, 7, 10,11,and 14, please refer to the Department of the Treasury's report. Since this on-line form requires responses for some of these questions, we provided placeholder responses to advance to the next part of the form.
Department of the Treasury	Office of Inspector General	Please reference Department of Treasury/Main Treasury questionnaire for information about the DAEO, ADEO and main agency ethics structure (q. 6, 10, 11, 14).
Department of the Treasury	Alcohol and Tobacco Tax and Trade Bureau	Q #8 - Increase in ethics official between 2011 and 2012: agency hired additional ethics official with help with program.
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	Question 8 - per EO (Roderick Fillinger) on 3/19/13 answer to total number of ethics officials is 4.
Department of the Treasury	Financial Crimes Enforcement Network	Question 6: Specific information about the DAEO and ADAEO can be found in the Treaury Department Questionnaire. We have provided basic information regarding each individual.
Department of the Treasury	Bureau of Engraving and Printing	Questions 6, 10, and 11: Our bureau is part of the Department of the Treasury and does not have a separate DAEO or ADAEO. Relevant information relating to the DAEO and ADAEO in response to these questions will be provided by the Department of the Treasury.

<p>Department of the Treasury</p>	<p>Internal Revenue Service</p>	<p>For question # 6, please refer to the Department of Treasury/Main Treasury questionnaire information (the positions are not vacant).</p>
<p>Department of Veterans Affairs</p>		<p>Questions 7 and 8: On April 1, 2012, OGC launched a pilot project to study the efficiencies that could be gained through staff specialization in ethics through a virtual team called the Ethics Specialty Team. The EST utilizes 13 Deputy Ethics Officials dedicated full-time to ethics. For the first quarter, of CY 2012, the program worked in a decentralized model with a large number of part-time ethics officials as reflected in question 7's response. Question 14: All aspects of the program are discussed with the Secretary's Office as necessary. The VA Chief of Staff is active in assisting the DAEO in obtaining compliance with filing and training requirements.</p>
<p>Environmental Protection Agency</p>		<p>We have an online course for ethics officials that available on our intrane website. In addition, we host monthly conference calls with our HQ ethics officials, and a separate monthly call with our regional ethics officials. A growing number of EPA officials have taken OGE training, including the new ethics official certification course.</p>
<p>Equal Employment Opportunity Commission</p>		<p>Regarding questions 4 & 5, the 9 SGEs are the same employees as the 9 IPAs. That is, all 9 SGEs worked under IPAs.</p>
<p>Export-Import Bank of the United States</p>	<p>N/A</p>	<p>Q 14: The DAEO reports to the Agency head and Senior Management on a routine basis concerning new developments in the area of Ethics, as well as standard deadlines and other matters of interest.</p>

Farm Credit Administration	N/A	#11 FCA uses common elements for employees, but the ethics responsibilities of the ethics staff are noted and considered in their respective performance appraisals.
Farm Credit System Insurance Corp.	N/a	See comments on report filed on the Farm Credit Administration.
Federal Mediation and Conciliation Service		Since ethics program management has not been delegated, I should not be required to answer question 13.
Institute of Museum and Library Services	N/A	15. Ethics officials receive ethics training and information from various sources throughout the year (i.e., OGE courses, Advisory Opinions, written advice, etc.). All significant training and information received by an ethics staff member is shared with ethics officials during weekly office meetings. Additionally, one-on-one guidance and instruction is also provided to ethics staff by the DAEO or ADAEO, as needed.
International Trade Commission		In addition to the full time employees, there was one permanent part time employee.
Millennium Challenge Corporation		Question #8. Ethics Program Officer works on Ethics 100% of time. EPO position description includes ethics program and Ethics is included in performance appraisal.

<p>Morris K. Udall Foundation</p>		<p>Q #8 - Difference between last year's number of 3 ethics officials and this year's number - zero, is a mistake. Last year's number included the DAEO, ADAEO and an assistant. Question specifically state not to include DAEO and ADAEO in count. This year's number is correct because DAEO manages the whole program and does not have an assistant.</p>
<p>National Aeronautics and Space Administration</p>		<p>Item 4. The figure for SGE's reflects the number of SGE's whose appointments occurred during 2012. Item 9. Although we do not believe additional resources are needed for NASA's ethics program at this time, we do note that requirements with the STOCK Act have placed existing strain on resources. Item 10. One deputy ethics official does not have ethics duties in their position description and is taking steps to have it revised to include ethics duties.</p>
<p>National Credit Union Administration</p>		<p>6. Significant change is due to ADAEO now assigned to doing ethics as her full time duty. Last year she performed ethics as an ancillary duty. 7. SSP position is our agency equivalent of SES. 8. Reduction in ethics officials (from 11 to 7) is due to turnover in deputy EO positions. 11. CU position is our agency equivalent of GS. Position as Senior Ethics Counsel is newly established. It is a 3-day per week position. Previously an Associate General Counsel served as ADAEO, as a collateral duty. The new position is a dedicated ethics position. 19. Although the program is managed in the Central Office, each of 5 regional deputy ethics officials are responsible for ensuring filing and training within their respective regions. 22. Structured training in the form of informal meetings and conference calls.</p>
<p>National Endowment for the Arts</p>	<p>N/A</p>	<p>Question 4: We are referencing the total number of SGEs as reflected in Part 8, see attachment in Part 8. Question 6: NEA DAEO and General Counsel, Karen Elias, was eligible to retire in December 2012 and retired in June of 2012. India Pinkney is now General Counsel for the NEA, and the DAEO.</p>

<p>National Endowment for the Humanities</p>		<p>Part 1, Q 8: The NEH Office of the General Counsel (OGC) administers the agency's ethics program. Within the OGC, one attorney, a paralegal, and a secretary worked part-time on the ethics program during 2012 to assist the DAEO and ADAEO. Part 1, Q 14: The DAEO reports to the Deputy Chairman of NEH.</p>
<p>National Geospatial-Intelligence Agency (NGA)</p>		<p>NGA personnel numbers are classified and will remain on record at the NGA Ethics Program Office</p>
<p>National Labor Relations Board</p>		<p>Question 17 and 18: The ethics program officers for the NLRB (Administrative Officer and Management Analyst) have ethics program duties as part of their position descriptions and performance plans. Question19: Until recently, the NLRB's Ethics Program was managed by the Office of the Director, Division of Administration. With the retirement of the Director of Administration in August 2012, Margery Lieber, Deputy Associate General Counsel, Division of Enforcement Litigation, was appointed DAEO, but administration of the program itself remained in the Division of Administration. As mentioned earlier, a reorganization will take place in 2013 which will transfer the ethics function to a newly-created Division of Legal Counsel where it will be combined with the NLRB's Legal Ethics Program, creating a comprehensive, cohesive Ethics Program for the NLRB.</p>
<p>National Security Staff</p>		<p>Our response to Question #3 includes direct NSS employees and does not include individuals who are detailed or assigned to the NSS from departments and agencies.</p>
<p>National Transportation Safety Board</p>		<p>6. The ADAEO was on detail for 4 months of the year, which affected the percentage of time spent on ethics matters. Normally, she would spend approximately 50% of her time on ethics matters. 8. This number includes an attorney (James Rodriguez) who acted as a deputy DAEO, limited to Combined Federal Campaign matters, and our Ethics Paralegal (Tracy Williams). 10, 11. Ms. Williams, our Ethics Paralegal, has her ethics duties included as an element of her position description and performance appraisal.</p>

Office of Administration		#11. OA requires all employees to have uniform elements in their appraisals, so there is not a specific ethics element in appraisals. However, ethics duties are specifically included under work objectives element for DAEO, ADAEO, and Program Manager; performance of those duties is addressed in the narrative in each person's appraisal.
Office of Management and Budget		Question 9: Current staffing levels are technically sufficient for the time being, but seasonal and periodic surges – and the likelihood of increased burden flowing from STOCK Act compliance over time – can cause occasional bottlenecks that result in delays, either in the ethics program or fulfillment of competing agency priorities; as a result, OMB OGC is considering seeking additional detailees with specialized ethics training to, e.g., contribute to Stock Act implementation and annual 278 reviews in CY 2013 and subsequent years.
Office of the Vice President		8. Number of ethics officials who worked in the ethics program in 2012 (Do not include the DAEO, ADAEO or contractors) Five federal employees were detailed to OVP in 2012 to serve, in teams of two, as full-time deputy ethics officials to advise Counsel staff on a variety of ethics issues. The Counsel (DAEO) and two Deputy Counsel to the Vice President (ADAEO and deputy ethics officials) worked part-time on ethics in 2012 and were responsible for providing ethics advice to OVP staff. In addition, an Assistant Counsel also provided assistance to the ADAEO on ethics related matters during the year. 10. Identify the agency ethics officials that have ethics duties as an element in their position descriptions. In accordance with the terms of their individual Memorandums of Understanding, employees detailed to OVP advise Counsel staff on a variety of ethics issues. In addition, while there are no written position descriptions for their roles, the Counsel and Deputy Counsel to the Vice President are responsible for providing ethics advice to OVP staff. 11. Identify the agency ethics officials that have ethics duties as an element in their performance appraisals. The employees detailed to OVP in order to advise on ethics issues are reviewed by their home agencies, and the appraisals typically evaluate the performance of ethics duties based upon feedback from OVP. OVP does not provide written

		<p>performance appraisals. 12. Check the box that most closely describes the structure of your agency's ethics program. All program management of Executive Branch ethics rules for OVP employees is conducted within the Office of the Counsel to the Vice President. Certain OVP employees are on the Senate payroll and are therefore also subject to the Senate ethics rules. Senate-payroll OVP staff receive new entrant training sponsored by the Senate Select Committee on Ethics. Ongoing counseling for Senate-payroll OVP staff is conducted within the Office of the Counsel to the Vice President. 13. If ethics program management has been delegated, indicate which elements have been delegated. The ethics official(s) detailed to OVP manage the day-to-day functions of OVP's ethics program under the supervision of the Counsel and the Deputy Counsel. 15. Have ethics officials received ethics training in 2012? Ethics official detailed to OVP received training prior to joining OVP through their home agencies and/or OGE-sponsored programs. OVP Counsel provided ethics officials with additional training as needed to carry out their ethics duties.</p>
Pension Benefit Guaranty Corporation		<p>In addition to officials noted above, PBGC's General Counsel is actively engaged in the ethics program and regularly works with the Ethics staff on all ethics issues.</p>
Securities and Exchange Commission		<p>Q #4 - Lists 12 SGEs but reported that they did not file 278 or 450. Per ADAEO, these individuals are at a very low pay scale that they do not meet the threshold to be required to file 278 or 450. Q #8 - Significant decrease in ethics officials from 2011 report to 2012. Agency under former DAEO had an ethics liaison program in which there were ethics liaisons all the operating divisions and regional offices, hence the large numbers in 2010 and 2011. The new DAEO did away with the ethics liaison program and limited ethics to employees in the GC; this caused a significant drop in the numbers.</p>
Selective Service System		<p>The ADAEO retired near the end of 2012. Recently in January 2012 new ADAEO was designated.</p>
Social Security Administration		<p>Q #4 - The decrease in number of SGEs from 2011 questionnaire to this year's is due to - agency did not use several groups that they used in prior reporting period. Q #8 - The decrease in ethics officials from</p>

		prior year's report is due to agency reorganizing the ethics program to centralize it within Office of the General Counsel (OGC), therefore decreasing the number of people involved.
Tennessee Valley Authority		Q #4 - The decrease in the number of SGE from last year is three members of the Board terms had expired, leaving only six (6) members. Note: A full functioning TVA Board consists of nine members. Q #8 - The decrease in ethics officials is due to agency using three (3) HR employees to assist with ethics duties. These individual no longer have ethics as their ancillary duties, hence the decrease. Note: the total for last year is incorrect. Questionnaire lists the agency having 14 ethics officials. However, what appears to be an error in the entry lists 12 on the spreadsheet.
US Trade and Development Agency		Question #6: The previous DAEO and General Counsel, James Wilderotter, retired on 5/3/2012; the previous ADAEO, Assistant General Counsel David Hester, left the agency on 9/21/2012. The Acting General Counsel, Enoh Ebong, has been serving as the acting DAEO. The Deputy Ethics Officer, Assistant General Counsel Ziyang Fan, has been serving as the acting ADAEO.
White House		Question 1: The White House consists of the Office of Policy Development and the White House Office. Question 2: Consistent with past practice, SGE totals do not include individuals who may have worked in an unpaid, intermittent capacity. Footnote 1: The White House is not an agency for these purposes but is submitting this questionnaire voluntarily in the interest of transparency. Footnote 2: 4 of the Designated Deputy DAEOs have completed their details or have transferred from the White House Office.

PART 2. PROGRAM ADMINISTRATION

16) Use the following scale to rate the amount of time your agency spends to administer each item. *

	No time	Limited amount of time	Moderate amount of time	Considerable amount of time	Extreme amount of time	RANK ORDER
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Public financial disclosure program (SF 278/OGE Form 278)	()	()	()	()	()	1 (470)
Confidential financial disclosure program (OGE Form 450)	()	()	()	()	()	2 (462)
Outside activity approval program	()	()	()	()	()	5 (353)
Written opinions and counseling	()	()	()	()	()	3 (458)
Education and training	()	()	()	()	()	4 (449)
Disciplinary process for violations	()	()	()	()	()	8 (206)
Special Government employee activities	()	()	()	()	()	7 (247)
Developing information technology applications for any aspect of the ethics program	()	()	()	()	()	6 (300)

Other elements not listed (please specify)

1: Agency	2: Subcomponent (if applicable)	Other elements not listed (please specify)
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Administrative Conference of the United States	N/A	Ethics program recordkeeping
Corporation for National and Community Service		Ethics Pledge
Department of Justice	Civil Division	Stock Act - Moderate amount of time.
Department of Justice		Stock Act implementation - extreme amount of time.
Department of Labor		Internal document clearance for ethics issues = extreme amount of time
International Trade Commission		An OGE audit took a considerable amount of time. Vetting a potential nominee to the position of Commissioner atypically took a very substantial amount of time. Educating employees about the STOCK Act and implementing the requirements required moderate to considerable amount of time on a periodic basis.
Tennessee Valley Authority		Coordination/development of other TVA policy, practice, and procedure with ethics components.

17) Did your agency (e.g., ethics office, Inspector General, General Counsel) conduct a self-assessment to evaluate any aspect of the ethics program in 2012?*

Yes **72 (53%)**

No **63 (47%)**

What did you assess? Check all that apply.*

- employee perceptions about the ethics program 25
- employee knowledge of the ethics rules 28
- employee perceptions about the agency's ethical culture 18
- compliance with applicable ethics laws and regulations 44
- employee knowledge before or after training 24
- employee satisfaction with training offered 33
- consistency, accuracy and timeliness of advice and counsel 35
- knowledge and skills of ethics officials 23
- Other (specify) 24

1: Agency	2: Subcomponent (if applicable)	Other (specify):What did you assess? Check all that apply.
Department of Agriculture		Every email sent by OE staff contains a request for USDA employees to submit an electronic survey to provide feedback and comments. OE utilizes the surveys to assess the timeliness, accuracy, and other qualities of the ethics advice provided. Each completed survey is viewed by the DAEO and ADAEO.
Department of Energy		Field audits
Department of Health and Human Services		to identify: best practices or deficiencies; opportunities for improvements; and financial disclosure filers.
Department of Homeland Security	U.S. Coast Guard	to prepare for annual DHS IG ethics program audit

Department of Homeland Security	Transportation Security Administration	public financial disclosure program procedures
Department of Justice	United States Trustee Program	The purpose of the self-assessment was to continue to understand how to streamline the ethics program and to determine the best allocation of resources among the ethics officials.
Department of Justice	Executive Office for United States Attorneys	EOUSA-wide survey which included the General Counsel's Office responsiveness and guidance to the USAOs.
Department of Justice	United States Trustee Program	The purpose of the self-assessment was to continue to understand how to streamline the ethics program and to determine the best allocation of resources among the ethics officials.
Department of State		Reduction of certifying reports

Department of the Army		Program management
Department of the Interior		In some bureaus, deputy chiefs are sampled for quality of ethics advice.
Department of the Treasury	Comptroller of the Currency	consistency in review of confidential financial disclosure reports
Department of Transportation		Ethics Office Administration, Financial Disclosure
Election Assistance Commission	N/A	Prepare for an OGE program review
Farm Credit Administration	N/A	Financial disclosure reviews and process, effectiveness of ethics counseling and training, intragovernmental liaison and regulation and policy development activity and needs, internal controls, efficiency and effectiveness of program.
Farm Credit System Insurance Corp.	N/a	See comment filed for Farm Credit Administration.
Federal Energy Regulatory Commission		Agency compliance w/applicable GAO Standards for Internal Control requirements.
Federal Housing Finance Agency		Internal control audit review pursuant to OMB Cir. A-123; FHFA OIG Audit of the FSOC Controls and Proprietary Information
Inter-American Foundation		450 form/alternate form

National Aeronautics and Space Administration		Employee responses to Question 54 on leadership integrity on OPM's Federal employee viewpoint survey.
Office of Administration		Completed Federal Managers' Financial Integrity Act Report for Fiscal Year 2012 on the OA Ethics program.
Office of Government Ethics		Reviewed whether 278 and 450 filers are appropriate.
Social Security Administration		reorganization
Surface Transportation Board		Some review of the program occurred as the former DAEO retired and new ethics officers took over. We are still reviewing parts of the program, looking for areas to improve.
Uniformed Services University of the Health Sciences		determine agency needs
US Postal Service		Financial Disclosure Program
US Trade and Development Agency		Discussion with senior management to improve ethics training; examination of agency's ethics program through the OGE ethics audit.

Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2012? Check all that apply.*

Training **60**

Mentoring **52**

Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **35**

Individual development plans **23**

written standard operating procedures **46**

Knowledge library (Intranet, videos, shared drives) **47**

Competency/skills gap assessment **12**

Resources assessment (personnel and/or financial) **25**

None **0**

Other (specify) **9**

1: Agency	2: Subcomponent (if applicable)	Other (specify): Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2012? Check all that apply.
Department of Agriculture		OE utilized developmental details during 2012. Specifically, one branch chief served a 120 day detail in the operations management department of one of the agencies he provides ethics services to. Additionally, two Senior Ethics Specialists from within the OE Director's Office served 60 day details as the Acting Branch Chief in one of the branch offices.
Department of Defense Office of the Inspector General	Office of General Counsel	See additional comments for Part 2.
Department of Health and Human Services		use of internal website to dispense up-to-date ethics information and 360 degree assessment.
Department of Justice		Brown bag ethics luncheons twice monthly to discuss ethics issues.
Election Assistance Commission	N/A	OGE training courses

National Aeronautics and Space Administration		Face-to-Face Meeting
Office of Administration		Developed Written OGE-450 procedures for annual and new entrant filers.
Office of Management and Budget		Improved record keeping and document management.
Uniformed Services University of the Health Sciences		internal discussion with leadership and staff

18) Does your agency use an electronic financial disclosure filing system?*

Yes **47 (35%)**

No **88 (65%)**

If yes, indicate your FY 2012 actual and FY 2013 projected costs for using the e-filing system.*

FY 2012 actual costs: **__\$2,549,323.60**

FY 2013 projected costs: **__\$3,673,896.55**

19) Does your agency use an automated system to track the administration of the financial disclosure program? *

Yes **59 (44%)**

No **76 (56%)**

20) Do you receive timely notification of new entrant employees required to file financial disclosure reports?*

Yes **124 (92%)**

No **11(8%)**

21) Do you have written procedures for financial disclosure, pursuant to 5 U.S.C. app 402(d)(1)?*

() Yes **124 (92%)**

() No **11 (8%)**

22) Would you like to list the significant accomplishments your program achieved in 2012?*

() Yes **76**

() No **58**

If yes, please list them here:*

1: Agency	2: Subcomponent (if applicable)	If yes, please list them here:
Administrative Conference of the United States	N/A	We successfully concluded an OGE ethics review and implemented all required OGE recommendations. And, we developed better recordkeeping/tracking for SGE financial disclosure forms.
African Development Foundation		Ethics training for all DC staff, including USG direct hire employees and personal services contractors, and for locally hired personal services contractors in Africa. Hatch Act training for all DC staff.
Agency for International Development		Provided live ethics training to over 6,000 employees including 3,154 non-filers. Received OGE's report of our program review in which USAID was commended for: providing targeted training at international field offices that require enhanced support; offering a values-based "Ethics in Development" training program; and employing practices to ensure accurate and consistent advice

		and counsel is provided throughout the agency and missions.
Broadcasting Board of Governors		In 2012, the BBG Ethics Office secured 100% filing compliance for both its OGE 450 and OGE 278 programs. Additionally, the office reviewed 99% of its OGE 450 form and 95% of its OGE 278 forms within 60 days.
Central Intelligence Agency		Built new web-based application for tracking ethics training and completed financial disclosure forms (OGE 450 and OGE 278).
Chemical Safety and Hazard Investigation Board		Q. 17 and 22 - Desk audit by OGE - no problems found
Commission for the Preservation of America's Heritage Abroad		Counseling new Commission Members on eliminating potential conflicts of interest. Timely receipt of financial disclosures. Vetting new Commission Chairman.
Consumer Financial Protection Bureau		The Ethics Office developed, received OGE approval of, and published CFPB's Supplemental Ethics Regulations by April 2012. By the end of the calendar year the Ethics Office provided live training on the supplemental regulations to 98% of its current employees. The Ethics Office has also provided an hour of live training to all new employees during New Employee Orientation. In addition, the Ethics Office provides live training specifically designed for new Examiners, Supervision, and Technology & Information. The Ethics Office has utilized staff resources offered by OGE to help build the program and hired Kim Kaplan from OGE, who now manages the financial disclosure reporting program.
Corporation for National and Community Service		Implemented use of electronic financial disclosure system during this year, FDonline through an interagency agreement with NTIS.

Council on Environmental Quality		Organized Travel and Lobbyist Review Trained all 278 Filers on STOCK Act Conducted Annual, Hatch Act, Anti-Lobbying Act, and STOCK Act Training Prepared electronic version of Widely Attended Gathering Form
Court Services & Offender Supervision Agency for DC		Completed instructor-led ethics training for over 1216 federal employees, with agency-created video vignettes using current CSOSA employees.
Defense Commissary Agency	N/A	In conjunction with Contracting Officer Representation Training ethics officials expanded the 450 filers in the agency form 183 to almost 900.
Defense Finance and Accounting Service		1. Deployed an online financial disclosure system to streamline the ethics program and improve accuracy and efficiency 2. 100% compliance with filing requirements and no late filers 3. 100% compliance with ethics training requirements with all training completed on time 4. One-on-one ethics briefings and discussions with all DFAS senior leaders
Defense Information Systems Agency	n/a	Consistently notified new employees of the requirement to complete IEO and new entrant OGE Form 450s within the prescribed timeframe. Daily automatic emails were sent until requirements were met. Dateline DISA articles for DISA employees on ethics issues.
Defense Intelligence Agency		(1) The DAEO, ADAEO, and Deputy DAEOs all received OGE-led, in-person training on review and certification of financial disclosure forms. In previous years, this training was conducted by the lead Deputy DAEO for ethics. (2) For the 278s, we migrated to electronic filing for all but a few employees (such as those who were deployed or otherwise unable to complete the form online). (3) Annual ethics training for 278 filers was co-hosted by the Director of our Agency, LTG Michael Flynn, USA, at a mandatory Town Hall for Senior Employees, where LTG Flynn emphasized his expectation that senior employees be competent and adhere to the standards of conduct for federal executive branch employees. (4) We continued to develop very strong working relationships with other ethics professionals in the Department of Defense ethics community, as well as with ethics professionals in other government agencies, which helped tremendously when it came to problem-solving and collaboration to ensure that our office

		<p>provided high-quality ethics advice. (5) That level of sound and thorough advice and engagement has developed into closer and more collaborative working relationships with our client at all levels of the organization, resulting in greater reliance on our input and interaction with us at the early-stages and throughout the decision-making process. (6) We conducted weekly ethics training from September through mid-December (which we view as an accomplishment), although, regrettably, only approximately half of the 450 filers attended.</p>
<p>Defense Logistics Agency</p>		<p>(1) We have put in place an effective mechanism to identify New Entrant filers. First, we have further trained supervisors on the filing requirement. Included in our Annual DLA Ethics Training is information on the types of employees who should file (including a link to the DLA Policy for Identifying Filers); timing for identifying the requirement; and new duties that could require filing. Second, we coordinated extensively with DLA Human Resources on using a job aide for supervisors to determine whether positions/ employees require filing on the confidential report. (2) Revised Annual Ethics Training. After the Secretary of Defense issues guidance on DoD ethics programs and particularly that senior leaders must “foster a culture of ethics” within their organizations, we quickly revised our annual ethics training to include values-based-decision-making as the theme of the presentation. We conducted this training both on-line and in-person.</p>
<p>Defense Security Service</p>		<p>In 2012, we developed written guidance for DSS employees covering various ethics-related topics, including gifts, conflicts of interest, and outside employment and business activities. We updated our agency's ethics webpage to include useful and easy to understand ethics information for our employees. We also provided in-person ethics briefings for all new agency employees.</p>

Department of Agriculture		<p>The Office of Ethics (OE) has had numerous significant accomplishments in 2012. Among these, completing the transition to mandatory 100% electronic filing for all of USDA’s more than 600 Public Financial Disclosure Reports and for all Periodic Transaction Reports required by the STOCK Act. To improve the timeliness of filer submissions, OE has expanded mandatory electronic filing to include USDA’s approximately 16,000 Confidential Financial Disclosure filers. To promote compliance with STOCK Act requirements, OE created a new webpage on the USDA Ethics website devoted exclusively to STOCK Act guidance. OE also implemented a system to electronically notify all OGE-278 filers about STOCK Act requirements and provide them with “real time” updates on Congressional amendments to the Act and judicial action concerning the Act. OE also developed training specifically on the STOCK Act and processed and uploaded OGE-278 reports onto the OMB MAX system. Moreover, OE implemented the Secretary of Agriculture’s realignment of USDA’s Ethics Program from the Office of Human Resources Management to report directly to USDA’s General Counsel. In addition to these accomplishments, OE also provided extensive Hatch Act training in 2012. For a period of 10 months, OE conducted large group training, at least twice every week on the rules governing political activities. This was the most extensive training on the Hatch Act that USDA has ever provided its employees. There are numerous other significant accomplishments. During 2012, OE: (1) updated its electronic ethics training modules in AgLearn, which are used by USDA employees stationed around the world; (2) expanded its ethics training and counseling to more than 50 USDA Advisory Committees and Panels; (3) continued the DAEO’s “Ethics Moment” presentations for the Secretary of Agriculture’s weekly Sub-Cabinet meetings and the USDA White House Liaison’s weekly policy officials meetings; (4) created numerous new and topical “Ethics in Brief” one-page summaries of specific ethics rules to train senior USDA executives; (5) provided large scale, auditorium, training specifically tailored to USDA’s career and policy-making executives and GS-15 and</p>
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		<p>GS-14 managers (OE had one of these training sessions videotaped and placed on the USDA Ethics website for viewing by the Department’s employees located across the country and around the globe); (6) provided ethics guidance to the members of USDA’s Scientific Integrity Task Force; (7) provided a senior-level briefing on USDA’s Ethics Program to visiting senior Ministry of Agriculture ethics officials from the People’s Republic of China (OE provided the delegation with copies of the ethics presentation in Mandarin, which OE developed at no cost); (8) provided extensive post-employment training and counseling to USDA employees considering leaving Federal service; provided extensive training and guidance to USDA employees on the ethics rules and the Ethics Pledge’s requirements relating to attending Inaugural gala events; and (9) to improve communications and idea exchanges among its branches, OE re-located the Forestry Ethics Branch from its remote location in Rosslyn, Va. to office space within USDA’s South Building, near two other OE branches and the OE Director’s Office.</p>
Department of Commerce		<p>The Department offered the option of electronic filing through our newly purchased FDonline system to all public financial disclosure report filers and a small sampling of confidential filers.</p>
Department of Defense Office of the Inspector General	Office of General Counsel	<p>The year 2012 was the second year of successful electronic filing for financial disclosure reporting.</p>
Department of Education		<p>(1) With the enactment of the STOCK Act, the Ethics Program created a series of information bulletins regarding the various components of the new statute. The goal of the bulletin was two-fold: to keep OGE Form 278 filers aware of changes resulting from the enactment of the statute (and to continuously remind them of those changes regarding the changing public posting dates, the 278-T reporting requirements and post-employment negotiations disclosure requirements) and to provide our filers with the opportunity to ask questions about the statutory changes. (2) As a result of the transactions reporting requirement of the STOCK</p>

		<p>Act, the Ethics Program created a review form for the OGE Form 278-T in order to provide consistency in reviewing the form by our ethics officials. We believe that the review form will also assist in reconciling a filer's transactions for the annual reporting in May 2013. (3) During the 2012, the Ethics Program made significant progress in eliminating the backlog of uncertified OGE Form 278s and OGE Form 450s. Additionally, the Ethics Program also created a triage process for all incoming OGE Form 278s. The process allows our ethics officials to address any COIs issues immediately upon receipt of the form and to quickly certify those forms that do not present any COI issues. (4) During the 2012, the Ethics Program established a step-by-step protocol for addressing non-responsive and non-compliant filers. These are generally filers for whom there are questions about his/her report but the filer consistently fails to respond or respond fully to questions posed by the reviewer. This protocol includes a fairly strict timeline for reminders to the filer and a process for informing the filer's supervisor if the filer continues to be non-responsive or non-compliant. This process also includes random visits to a filer's office to obtain the outstanding information for the form.</p>
<p>Department of Health and Human Services</p>		<p>Conducted 9 ethics program reviews of HHS component ethics offices, issuing 7 reports and finding 39 items requiring action. Developed and launched the HHS Electronic Financial Disclosure System (EFDS). We provided in person IEO and AET for non-career personnel. The Program Review Team received the General Counsel's "Excellence in Legal Services" award. The agency's 2012 AET (focused on seeking employment and post-employment requirements) was developed and launched. Implemented informational ethics related bulletin boards. NIH instituted the New Ethics Official Certificate Program. Implemented procedures to ensure compliance with the STOCK Act requirements.</p>

<p>Department of Homeland Security</p>	<p>U.S. Customs and Border Protection</p>	<p>Transition to electronic OGE Form 450 filing process using the Human Resources Business Engine (HRBE).</p>
<p>Department of Homeland Security</p>		<p>1. Initiated an oversight auditing program. 2. Significantly enhanced databases for tracking of financial disclosure and training. 3. Obtained DHS OCHCO partnership to review HQ PDs for accurate determination of filing status. and a partnership to review and correct all HQ PDs. 4. Developed a tool to support supervisor's in determining who would be required to file the OGE Form 450. 5. Lanuched a partnership with all HQ program offices to ensure accurate filer identification and to support the collection of annual OGE Form 450s.</p>
<p>Department of Homeland Security</p>	<p>Secret Service</p>	<p>We published "Standards of Ethical, Professional, and Personal Conduct: A Desk Reference for United States Secret Service Employees," a new ethics guide that will be issued to all current and new employees. We enhanced our training program to reach more employees than those required to receive training under the financial disclosure programs or as new employees. An ethics briefing has been added to most internal agency training programs. When we conduct field office training with filers, we invite the office heads to have additional employees attend. We continued with our initiative, begun in 2011, to travel to all field offices to conduct training.</p>
<p>Department of Homeland Security</p>	<p>Transportation Security Administration</p>	<p>* 100% training compliance for Public Financial Disclosure filers * Updating and enhancing information available to agency employees via Ethics intranet site * Implementation of new online training resources * Centralization of financial disclosure program administration and development of robust ethics program procedures * STOCK Act compliance - ethics staff participated in OGE/OMB Stock Act posting education webinars and DHS informaitonal meetings and prepared TSA for complaince with posting requirements. Ethics staff also provided 278 filers with timely notice of STOCK Act requirements, provided filers with forms and information resources, included STOCK Act information in training, and kept 278 filers informed</p>

		about changes to STOCK Act requirements
Department of Homeland Security	Immigration and Customs Enforcement	Complied with the new mandates imposed by the STOCK Act for online posting of public disclosure forms. - While operating at 80% attorney strength for 11 of the last 12 months, the ICE Ethics Office successfully navigated approximately 40% increase in ethics actions (advice and program management), a 15% increase in OGE 278s, a 5% increase in OGE 450, and a 3% increase in one-hour live training presentations.
Department of Homeland Security	Citizen and Immigration Services	Our Agency required annual Ethics training of all employees. The Ethics Office provided live instructor-led ethics training to over 1,500 employees. Close to 9,000 employees took a 1.5 hour online Agency created Ethics and Integrity Training. The Ethics Office provided written Ethics guidance in broadcast messages to ALL employees on issues such as gifts, fundraising, Hatch Act, etc.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	(1) Successfully implemented first filing season with FDonline (2) Final rule issued for revised HUD Supplemental Ethics Regulations (in effect 9/5/2012) (3) Provided multiple Hatch Act trainings and made available to employees on demand (4) OIG attorneys made a presentation to the IEC on COI in Grants
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	Successfully began transition of ethics program responsibilities to a new manager.

<p>Department of Justice</p>	<p>United States Trustee Program</p>	<p>In the past year, the ethics group increased the level of awareness among the component's employees regarding substantive ethics laws through various activities. We devoted significant time to tailoring the annual ethics training to focus on issues that are relevant to employees in their daily practice. In addition, the ethics group crafted a new format designed to enhance employee interest in the training. We also engaged in outreach through the year with email updates on relevant ethics developments, and we provided important information at periodic meetings of Executive Office senior staff and United States Trustees. Finally, we successfully implemented the STOCK Act for the component's relatively large number of public financial disclosure filers within the strict time limits for doing so.</p>
<p>Department of Justice</p>	<p>Environment and Natural Resources Division</p>	<p>We provided in-person training to all 278 and 450 filers. The interactive training was well received by attendees, based on the positive comments they provided. We also analyzed, implemented and trained employees on the newly enacted STOCK Act to comply with short statutory deadlines.</p>
<p>Department of Justice</p>		<p>DEO Deputy Director Kathy Silbaugh provided invaluable guidance to OMB and to OGE in STOCK Act compliance initiatives as to internet posting of Form 278s, utilizing DOJ's considerable advance preparation efforts to streamline and troubleshoot posting issues for other executive branch agencies. DOJ used considerable resources for Stock Act compliance in a very short time frame, meeting or exceeding deadlines set forth by the Act. In 2012, DOJ provided live annual ethics training to its financial disclosure filers, both public and confidential, utilizing a PowerPoint presentation involving team competitions and interactive software, which was very well-received by its recipients.</p>
<p>Department of Justice</p>	<p>Executive Office for United States Attorneys</p>	<p>OGE conducted a review of the EOUSA nomination process and OGE found that EOUSA had a model program due in part to leadership support, clear delineation of duties, comprehensive written procedures for important aspects of the nomination process, knowledgeable ethics officials, and excellent tracking mechanisms. EOUSA also released another ethics training video titled, "American Ethics Idol."</p>

		The television show "American Idol" is used as a backdrop for the discussion of ethics rules that stem from Departmental policy and the governing ethics regulation for Executive Branch employees. Topics covered in the video include: financial conflicts of interest, appearance issues, gifts, misuse of government resources, fundraising, outside activities, seeking employment, post-employment restrictions, and the Department's culture of values.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	OJP's ethics team significantly revised OJP's ethical guidance for interacting with non-federal entities, and provided ethics training to approximately 80% of OJP staff. OVW trained all of its employees in 2012, including financial disclosure filers.
Department of Justice	Drug Enforcement Administration	a. Developed for second consecutive year video-based annual ethics training with assessment questions that was incorporated into a DEA-wide training database (DEALS) that tracks DEA employees' entire training history. Goal is to develop 3-4 years of training from ethics vignettes filmed in 2011. b. Conducted seeking/post-employment training at 9 DEA retirement seminars and provided 18 written post-employment opinions.
Department of Justice	Criminal Division	I drafted and provided extensive but condensed Hatch Act guidance for "further restricted" employees. I provided additional training for those subject to the STOCK Act. I provided ethics training to everyone in the Criminal Division. Approximately 500 people attended live training, and approximately 500 people viewed a powerpoint to satisfy their ethics training requirement. The powerpoint was developed by the Departmental Ethics Office. I revised it to make it more relevant to the Criminal Division.

<p>Department of Justice</p>	<p>United States Trustee Program</p>	<p>In the past year, the ethics group increased the level of awareness among the component's employees regarding substantive ethics laws through various activities. We devoted significant time to tailoring the annual ethics training to focus on issues that are relevant to employees in their daily practice. In addition, the ethics group crafted a new format designed to enhance employee interest in the training. We also engaged in outreach through the year with email updates on relevant ethics developments, and we provided important information at periodic meetings of Executive Office senior staff and United States Trustees. Finally, we successfully implemented the STOCK Act for the component's relatively large number of public financial disclosure filers within the strict time limits for doing so.</p>
<p>Department of Labor</p>		<p>-Implemented monthly remindre emails and guidance to all public filers regarding periodic reporting under Stock Act -Implemented routine conference reviews after GSA conference scandal - Developed and implemented targeted training on ethics in procurement -Continued regular presentation at the senior management meetings</p>
<p>Department of State</p>		<p>Reduction in backlog of reviewing/certifying financial disclosure reports. Established metrics by instituting new weekly work goals. Increase in personnel. Development and rollout of online Annual Ethics Training. Decision to switch to FDM beginning in 2013.</p>
<p>Department of the Air Force</p>		<p>We were successful in completing our overall mission goals and requirements despite agency-wide fiscal reductions and manpower limitations. Specifically, we successfully implemented at both the headquarters and installation levels a number of new labor intensive administrative requirements pursuant to the STOCK Act. This included, in part, the delegation of greater responsibility for the OGE 278 filing and review process to the intallation level ethics counselors to ensure the effective and timely management of the Public Financial Disclosure Program.</p>

Department of the Army		Managed the Financial Disclosure Management (FDM) system for electronic financial disclosure filing across DoD, which several other executive branch agencies have also elected to use. FDM processed over 45,000 Army financial disclosure reports electronically and a total of over 120,000 executive branch wide. Continue to conduct the Ethics Counselor's course at the Army JAG School, providing a week long comprehensive ethics training course to over 300 attorneys and ethics counselors from across DoD each year.
Department of the Interior		Deputy Ethics Conference attended by 70 ethics counselors nationwide.
Department of the Navy		Continue to increase the use of electronic filing of financial disclosure reports.
Department of the Treasury		We achieved 100 percent compliance for ethics training for required employees. We uploaded 100 percent of required reports for STOCK Act potential posting. We continue to improve the ethics database tracking system implemented in 2012.
Department of the Treasury	Bureau of Public Debt	As a result of the consolidation of the Bureau of the Public Debt and the Financial Management Service into the Bureau of the Fiscal Service, we worked with our new counterparts on the annual ethics training for the (new /combined) Bureau of the Fiscal Service Executive Board. We also worked together on a Hatch Act notice to employees.
Department of the Treasury	Comptroller of the Currency	Provided ethics training to all employees. Produced a video in house for use in the orientation program.
Department of the Treasury	Financial Management Service	In 2012, the Financial Management Service and the Bureau of Public Debt were consolidated, to include combining legal offices under one Chief Counsel. As we began the process of consolidating ethics programs, we jointly prepared and distributed to all employees (by posting to legacy bureau webpages) an information paper on the Hatch Act and concerns of special interest during a presidential election year. We also conducted joint training of Public Financial Disclosure Report filers.

Department of the Treasury	Bureau of Engraving and Printing	Out of 345 employees who were required to file an annual confidential financial disclosure report in calendar year 2012, 342 filed their form on or before February 15, 2012, two filed on February 16, 2012, and the last employee was granted an extension due to a serious medical condition. The agency implemented a requirement for all new entrant employees at its headquarters to complete online ethics training as part of the Treasury Learning Management System before assuming the duties of their new positions.
Department of the Treasury	Internal Revenue Service	Extensive training and awareness campaign related to the Hatch Act.
Department of Transportation		DOT Ethics program review of DOT Ethics programs. Timely collection and review of financial disclosure reports. Timely identification of new entrant filers.
Department of Veterans Affairs		As part of an Office of General Counsel pilot initiative to explore ways to increase efficiency, OGC established a virtual team of ethics specialists called the Ethics Specialty Team. The EST is responsible for all aspects of the ethics program. Since its launch in April 2012, the team has exceeded baseline performance measures in all areas with fewer resources than previously allocated for ethics in the decentralized model. In addition, the team developed new interactive computer-based annual ethics training for confidential disclosure filers. Also, the team added a "class" of all VA confidential disclosure filers to VA's computerized training system, which means that, starting in 2013, the training is automatically assigned, tracked and recorded each year.
Election Assistance Commission	N/A	Obtaining a positive six (6) year audit from OGE.

Environmental Protection Agency	<p>1) We educated our public filers about the STOCK Act and committed to them that we would certify all of their forms prior to posting to the internet. Though the posting date has been delayed, we nevertheless met our objective to review, analyze and certify all filed 278s before the initial posting deadline. EPA also participated actively in the department/agency ethics officials group that met independently of OGE to navigate through the STOCK Act implementation. We ensured that our public filers were kept apprised of all developments. We also authored a comprehensive document to address their questions about transactions and how to report them (and why).</p> <p>2) Simultaneous with the STOCK Act (and the presidential election year), we also developed and launched our signature annual ethics training. Consistent with our interest in helping employees learn more than just the basic ethics facts (e.g., the \$20 rule), we designed our training to teach employees HOW to apply ethics tenets to their everyday working experience. We used a common EPA working issue -- collaborating with outside entities -- to create a course that asked the users to participate in a workgroup convened to find Earth Day activities with limited resources. The response to this particular course was overwhelmingly positive. People felt that they learned a great deal, and we heard many reports of people who, because of the training, were better able to identify endorsement and other misuse of position concerns.</p> <p>3) Though not an area addressed by OGE, we are also responsible for Hatch Act issues here in our agency. Simultaneous with an already challenging STOCK Act environment, we faced a presidential election year with an incumbent president, which presented significant additional issues and concerns. We advised our employees effectively on these issues as well.</p>
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Farm Credit Administration	N/A	(1) FCA received high marks when our ethics program was benchmarked again the other financial regulatory agencies. (2) We loaded all of our 278 reports onto the OMBMAX site. (3) We kept our public filers informed of the disclosure, reporting and posting requirements of the Stock Act. (4) We included training on the Procurement Integrity Act ethics provisions in our ethics orientation training, which all new entrants to FCA take on-line. (5) We provided in-person training to all covered employees in 2012 at headquarters and in the four field offices. (6) We implemented an FCA Board policy addressing ethics, trnsparency, exparte communications, and FCA's status as an independent, arm's length regulator. (7) We ran an agencywide contest asking employees to submit ideas for a new ethics tagline. The contest enabled employees to think about what ethics means to them and to take ownership of the ethics program. The winning tagline was "Ethics: Elevate Yourself To a Higher Standard." (8) We continue our regular outreach to all Agency employees by publishing 1-2 ethics articles each month in the Agency newsletter.
Farm Credit System Insurance Corp.	N/a	See accomplishments noted on report filed by Farm Credit Administration.
Federal Communications Commission		Implementation of various apects of the stockAct and uploading of OGE 278s to the OMB MAX.gov website.
Federal Deposit Insurance Corporation		Prepared for the closure of FDIC's Midwest Satellite Office which required post-employment briefing for approximately 500 personnel. FDIC has established the Office of Complex Financial Institutions pursuant to Dodd-Frank.
Federal Election Commission		During CY 2010 and 2011 the agency did not provide training other than new entrant orientation. The agency's Deputy Ethics Officer administered annual training for all agency employees for CY 2012. The training was designed to comply with regulatory requirements and covered subject matter beyond the minimum requirement for regulatory compliance.
Federal Energy Regulatory Commission		In 2012, we successfully launched a well-received ethics training presentation. Provided Ethics training to at least 1400 of the 1442 employees in our agency. We also addressed frequently asked

		questions during our ethics video.
Federal Housing Finance Agency		- STOCK Act: held workshops, attended by the Acting Director, to educate employees, answer questions and address their concerns; continued communications with employees re: updates to the Act as well as the ongoing requirements of the Act. - Received positive feedback in OGE's report, "A Vision for Ethics Program Management: Benchmarking Success" - Implemented workshops program to assist with annual financial disclosure filings - Annual 278 filing extensions reduced by more than 30.
Federal Labor Relations Authority	N/A	1. The DAEO created an annual training video using ExtraNormal software. Later on, the National Mediation Board used the video for its annual ethics training. 2. All ethics advice matters were responded to within 48 hours. 3. The DAEO continues to write a weekly ethics column for the FLRA employees' newsletter. This has increased the agency's knowledge of and sensitivity to ethics issues. 4. OGE Form 278 filers received frequent updates on the status of the STOCK Act disclosure requirements. 5. The FLRA now has an ethics page on its website.
Federal Maritime Commission		Created comprehensive ethics written training tool for filers of public financial disclosure reports. Worked with OGE to successfully complete clearance for two PAS nominees. Updated Commission Order relating to financial disclosure to reflect additional positions subject to confidential financial report filing requirement.
Federal Reserve Board	N/A	1. Provided detailed in-person ethics training to each new employee 2. Provided one-on-one post-employment counseling to each departing senior employee 3. Distributed, collected and reviewed 900 (+) financial disclosure forms in a timely manner 4. Updated annual on-line ethics training. 5. Prepared for STOCK Act compliance by uploading 300 (+) 278 financial reports.
Federal Retirement Thrift Investment Board		The Office of the General Counsel has established an effective system to designate specific responsibilities to its employees. This ensures that all ethics deadlines are met. We have also improved the accessibility and searchability of our ethics records

		and procedures to help increase the efficiency of our ethics program.
Federal Trade Commission	Office of the General Counsel	For many years, the FTC Ethics Team has used game-based training to educate senior staff (GS 14 and 15 employees receive face-to-face training every three years; SES and equivalent employees receive this training every year). The Ethics Team has continued to use innovative training techniques. For example, during CY 2012, the Ethics Team played “Ethics Football” and launched “Ethics Baseball” (using computer graphics coupled with live, “athletic” participation by trainees). The competitive, game-based training approach continues to be well received by staff and is easily tailored to the characteristics of a particular office (e.g., when traveling to our Seattle regional office, “Ethics Football” was comprised of the Redskins vs. the Seahawks—weeks before the historic play-off game took place).
General Services Administration	N/A	We engaged in targeted outreach for our employees. Our outreach included providing additional live training sessions for employees who were not scheduled to receive live ethics training, filming 30 second ethics spots highlighting various ethics rules which were played on a continuous loop at our EXPO conference, and providing special additional ethics training targeted to contracting officials.
Institute of Museum and Library Services	N/A	The agency's ethics program was audited by OGE during 2012. IMLS's Director, ethics officials, and staff were commended on maintaining an ethical culture within the agency and exhibiting model practices with regard to training and carrying out the agency's day-to-day ethical responsibilities.
Inter-American Foundation		first OGE audit in 10 year- no material findings.
International Trade Commission		We completed an OGE audit without any recommendations. Our in person annual training program was well received.
Millennium Challenge Corporation		100% Live Training Ethics Officials responds to ethics questions within 24 hours of receipt. Special presentation held by Office of Special Counsel

Morris K. Udall Foundation		For the first time, all agency employees, including part-time employees, participated in a on-line ethics training that met the annual ethics requirement. In addition, ALL employees participated in a more in-depth, in-person ethics review. And, for the first time, all SGEs filed a 450 in a more or less timely manner. In past years, there has always been one or two who never got it done.
National Aeronautics and Space Administration		Yes. Maintain the lead in positive responses to Question 54 on leadership integrity on Federal viewpoint survey among large agencies. Electronic implementation of the STOCK Act periodic reporting requirements.
National Credit Union Administration		We are about to implement the FDM electronic financial disclosure program for all filers. We transferred all our ethics opinions from our General Counsel's site to our a library for ethics officials only on our Agency's SharePoint site. We created a topical index in this shared library.
National Endowment for the Arts	N/A	Our agency underwent a significant transition when the DAEO/General Counsel retired after 20+ years and the ADEO moved to OGE in September 2012. Despite those major transitional changes in a small office that handles a broad section of subjects we were able to maintain an effective ethics program.
National Geospatial-Intelligence Agency (NGA)		The Ethics Program office created, recorded and broadcasted several Public Service Announcements for the NGA workforce on the following ethics topics: GIFTS, FUNDRAISING IN THE OFFICE, and THE HATCH ACT.

National Labor Relations Board		Decision to consolidate Legal Ethics Program and Government Ethics Program creating a cohesive, comprehensive program to serve Agency employees Survey of employees, the results of which are being used to develop a vigorous ethics training program for all NLRB employees and not just those covered by the OGE Training Regulation
National Mediation Board		Completed Ethics audit with no major deficiencies noted.
National Science Foundation		1) Comprehensive tailored training program. 2) Transactions reporting module incorporated successfully into eFile system
National Transportation Safety Board		This was the first year of the new DAEO & ADAEO, which followed the 12-year incumbency of the prior DAEO (Bill Love), so, particularly in the 278 and 450 areas, effectively assuming the responsibilities was an accomplishment, particularly when coupled with the new requirements of the STOCK Act. We undertook to streamline our processes for handling opinions for gifts of travel and gifts, including creating mail-merge documents for gift opinions. This resulted in our ability to provide more timely feedback on these opinions. We also began a program of additional in-person training, including some targeted training, that was well-received and useful.
Occupational Safety and Health Review Commission		"Ethics tip" provided at every agency-wide meeting (approximately one per quarter) All agency employees are now provided annual ethics training Updated written procedures for financial disclosure process New employees now receive ethics program welcome letter in their new employee packets
Office of Administration		Working to implement electronic filing and signing of 450's; developed written procedures for the Office of Administration on the the collection, review and evaluation of the financial disclosure reports filed by OA's employees, developed on-line annual ethics training.
Office of Government Ethics		OGE is making a conscious effort to document advice in writing. OGE provided new entrant and/or annual training to 100% of its staff.

<p>Office of Management and Budget</p>		<p>This year, in connection w/ Stock Act implementation, OMB detailed an attorney from another division to OGC, and with his assistance, comprehensive second and third round reviews of all OGE Form 278 disclosures were conducted. Written memoranda were prepared (and continue to be refined) on Stock Act implementation, including Sec. 17 negotiation notices, 278-T compliance, and the on-going status of the public-posting debate. OMB was intimately involved in Stock Act legislation discussions, as well as development of the mechanisms for internet posting. OMB OGC prepared substantial guidance documents on a wide range of topics, preformed multiple briefings to senior staff, as well as numerous one-on-one consultations, and engaged in regular and sustained coordination with the White House Counsel's Office about Hatch Act compliance and election year conduct. OMB OGC vetted numerous, complex requests to speak, write, engage in outside employment, and meet with stakeholders in the business, academic, environmental, and numerous other issue-centric communities. OGC shepherded into the Agency a steady influx of new senior staff members, aiding these individuals in resolving critical conflicts and optics issues in the process. OGC answered numerous requests for extensive, one-on-one seeking- and post-employment counseling, ultimately serving greater than 80 percent of the senior political staff individually. This entailed the preparation of recusal letters, assisting senior staff in discussions with outside employers concerned about the scope of post-employment and ethics pledge restrictions, and reviewing, implementing, and helping staff comply with screening arrangements. A process to substantially overhaul the technology involved in speaking-request approvals was initiated and is on-going. A similar effort is underway to implement electronic signature capability. An exhaustive fact investigation into alleged seeking employment misconduct was performed pursuant to a complaint from an outside entity (no misconduct was determined to have occurred).</p>
<p>Office of National Drug Control</p>		<p>326 requests for written ethics guidance were recieved in 2012. 277 of those were addressed within</p>

Policy		1 working day; 41 within 5 working days; and 8 required more than 5 working days.
Office of Personnel Management		Principal Deputy Ethics Official recognized with Director's Awards.
Office of Special Counsel		Full compliance regarding the financial disclosure program Successful completion of OGE program review Implementation of new ethics SOPs Reorganization of ethics record-keeping Implementation of annual ethics training for all staff
Pension Benefit Guaranty Corporation		– Development of new ethics training for managers and financial disclosure filers that includes fiscal and procurement considerations – Completed in-person ethics training for all available employees required to have annual ethics training – Notifying and training financial filers of the new requirement in the STOCK Act – One-on-one training for new senior executives during their first week at the agency
Railroad Retirement Board		During required training, we played an ethics Jeopardy game which made the trainees become more involved.
Securities and Exchange Commission		Development of electronic system to preclear trading activity pursuant to SEC Supplemental Ethics Rules
Selective Service System		OGE forms 450 and 278 were all turned in on time with no requests for extensions.
Tennessee Valley Authority		Transitioned the Public Financial Disclosure Reports to an electronic filing system. Implementing and adhering to STOCK Act requirements. Obtaining 99.7% completion rate of ethics training for all of TVA's workforce.
Uniformed Services University of the Health Sciences		Implementation of FDM system for OGE Form 278 filers; setting up FDM for 2013 OGE Form 450 filers
US Trade and Development Agency		USTDA's ethics program prepared for and cooperated with OGE's ethics audit of the agency and received predominantly positive review of the agency's ethics program.
Vietnam Education Foundation		

23) Would you like to list the great challenges facing your ethics program in the next 1-3 years?*

() Yes **70**

() No **65**

If yes, please list them here:*

1: Agency	2: Subcomponent (if applicable)	If yes, please list them here:
Administrative Conference of the United States	N/A	It remains a challenge to collect all financial disclosure forms from SGEs prior to their attendance at semi-annual plenary sessions (per agreement with OGE).
Agency for International Development		Regarding the on-line posting of information pursuant to the STOCK Act dependent on any final legislation, we will continue to be aware of the unique sensitivities of our personnel working in overseas locations. We have had a challenge of reconciling our Financial data Tracking System (FDTS) with the Agency's new "HR Connect" database. Continuing to track our employees ethics training and financial disclosure filings as they continually rotate through our large critical priority 1-year posts in conflict zones (Afghanistan, Iraq, Pakistan). Continuing to work with our counterparts at contractor and grant partners to assure compliance with ethics rules.
Broadcasting Board of Governors		One of the biggest challenges facing the Ethics Office, both financially and logistically, will be transitioning the agency to electronic financial disclosure filing.
Chemical Safety and Hazard Investigation Board		1) Ensuring that the new electronic ethics system for financial reporting works well and is used properly. 2) Redesign the ethics program to fit the reorganization. 3) Ensuring that we adequate resources. 4) Designing training programs to ensure that potential retirements or transfers do no harm

		the ethics program.
Consumer Financial Protection Bureau		Over the next several years, CFPB's Ethics Office will continue to develop and finalize our policies and procedures. The Ethics Office will also have to account for the rapid increase in the number of new employees as the Bureau continues to grow.
Corporation for National and Community Service		Succession planning. The current DAEO will retire in 2016 and the current ADAEO would like to relinquish ethics duties during this year.
Defense Commissary Agency	N/A	Implementation of the Stock Act requirements and education of filers. Implementation and training of the 450% increase in 450 filers.
Defense Contract Audit Agency		Potential centralized funding impact as to the automated 278/450 reporting system (Army's FDM).
Defense Finance and Accounting Service		1. Timely identification of new entrant OGE 450 filers 2. Succession Planning
Defense Information Systems Agency	n/a	We require filers' supervisors to conduct an intermediate review and it becomes challenging to get supervisors to conduct the review and e-sign the form in a timely manner.
Defense Logistics Agency		The biggest challenge is the prospect of personnel turn-over in the next one to three years with pending retirements and reassignments. In addition, with the current budget constraints, we are considered about the availability of ethics training. The OGE conference has always been an important source of our training.
Defense Nuclear Facilities Safety		performing reviews of 278s given the monthly filing requirements for selected transactions.
Defense Threat Reduction Agency	N/A	The STOCK Act.
Denali Commission		management of SGE issues

<p>Department of Agriculture</p>		<p>Among the greatest immediate challenges facing USDA's Office of Ethics (OE) are: (1) accomplishing ethics program requirements while enduring shortages of resources and staffing; (2) talent retention challenges, due to a lack of budgetary resources, which precludes career promotions to experienced staff and monetary performance awards to staff evaluated as “outstanding”; (3) risk management prioritization required by reductions in staffing due to the recent departure of three additional experienced ethics officials; (4) an inability to refill important vacancies; (5) antiquated IT desktop computer equipment; (6) a severe lack of computer laptops; (7) one antiquated laptop in OE Headquarters that can only run circa Windows 95 software; (8) a total staff of 24 serving a large Department of more than 110,000 employees and 17 component agencies, with wide-ranging regulatory responsibility and enforcement, food safety inspections, natural resources protection, scientific and bio-technology research, grant-making programs, multi-million dollar high-tech procurements, international agreements, food production marketing, and loan-making capabilities across the country; and (9) the challenge of implementing new time-sensitive workload responsibilities mandated by the STOCK Act and prospective regulatory changes concerning Federal employees serving as officers or directors of outside organizations.</p>
<p>Department of Education</p>		<p>(1) Instituting E-Filing (2) Revamping the training program</p>
<p>Department of Health and Human Services</p>		<p>The challenge of retaining and recruiting qualified ethics staff. Timely identifying when SGEs have to file financial disclosure reports. Developing ethics processes and guidance for the Combined Federal Campaign volunteers and managers. Receiving timely notification of incoming and departing employees.</p>
<p>Department of Homeland Security</p>	<p>Federal Law Enforcement Training Center</p>	<p>The development of a web based training program. In 2013 we will be conducting in-person ethics training to 100% of the FLETC staff at all four regional locations.</p>

Department of Homeland Security	U.S. Customs and Border Protection	Accommodating the increasing number of requests for guidance and advice in the ethics area with finite resources.
Department of Homeland Security		To obtain funding for an automated system for confidential financial disclosure filing, review and certification.
Department of Homeland Security	Secret Service	We would like to migrate to the electronic filing system used by other components of the Department, but have encountered technical issues.
Department of Homeland Security	Transportation Security Administration	*Continuing to adapt financial disclosure processes to timely and accurately comply with STOCK Act requirements *Implementation of DHS Supplemental Regulation on Outside Activities * Receiving timely notification of new entrant and departing employees
Department of Homeland Security	Immigration and Customs Enforcement	Manning / staffing issues. The ICE Ethics Office is small, and when fully staffed only has 5 deputy DAEOs / ethics officials for an agency with 20,000. We have not been fully staffed for most of the last 13 months and are currently operating at a critical level.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	(1) Launch of automated financial disclosure filing system for OIG and for STOCK Act requirements (2) Re-establish new, robust ethics program within OIG as new subcomponent (3) Implementing the administration of the United States Inter-agency Council on Homelessness ethics program
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	ATF's primary ethics advisor, who operated the program for 9 years, has taken a different position within the bureau, and the new challenge will be to operate the program with a new set of ethics advisors.

<p>Department of Justice</p>	<p>United States Trustee Program</p>	<p>In the next 1-3 years, we will face the challenge of converting many of our existing practices for information tracking, advice and counseling, and record-keeping to an on-line system. The goals of this transition are to facilitate communication, improve resource allocation, reduce paper and preserve and share information.</p>
<p>Department of Justice</p>		<p>With decreased resources, there is more need for and more interest in engaging in joint collaborations with non-Federal sources, which increases ethics concerns regarding travel, gifts, and misuse of position, and personnel, including unpaid services. The requests for ethics advice continue to increase and to reflect increased complexity, which require more in-depth knowledge of varied areas including LDA, personnel laws, appropriations law, etc. The impact of the STOCK Act, whatever its final implementation, will require substantial resources and will greatly affect the individuals covered by the new requirements; this will require significant ethics support.</p>
<p>Department of Justice</p>	<p>Executive Office for United States Attorneys</p>	<p>Compliance with STOCK Act re: the public posting of OGE 278 reports and the 278 T reports. The administrative demands of collecting the information and managing it in order to meet the requirements of the STOCK Act are very time consuming and labor intensive.</p>
<p>Department of Justice</p>	<p>Office for Justice Programs and Office on Violence Against Women</p>	<p>Assisting new political appointees with their various ethical considerations. The on-line posting of 278 forms raised various privacy concerns with our filers, including the possibility of identity theft and harassment.</p>
<p>Department of Justice</p>	<p>Drug Enforcement Administration</p>	<p>Identifying new entrant 450 filers; relying on contractors to provide paralegal and technology support to the ethics program.</p>

Department of Justice	Criminal Division	There is insufficient backup and assistance on a daily basis. From a program perspective, decreased funding means people look elsewhere for resources to do the job. This can create a number of ethics issues related to joint collaborations, travel and interns.
Department of Justice	United States Trustee Program	In the next 1-3 years, we will face the challenge of converting many of our existing practices for information tracking, advice and counseling, and record-keeping to an on-line system. The goals of this transition are to facilitate communication, improve resource allocation, reduce paper and preserve and share information.
Department of Labor		-Providing post employee briefings to increasing number of departing employees as baby boomers retire -Increasing utilization of technology
Department of State		ROI on using electronic Filing. Implementation of the Stock Act Transition of all New Appointees
Department of the Air Force		Significant challenges include sustaining manpower assets to accomplish an increasing volume of work while the agency is being compelled to reduce and downsize due to fiscal restraints. By way of example, we face the challenge of increased administrative oversight and management of the Public Financial Disclosure Program as a result of the implementation of the STOCK Act. However, no additional resources have been provided to manage these labor intensive tasks.
Department of the Army		Declining resources in an environment of increasing mission presents ongoing challenges. For example, implementation of the STOCK Act continues to present challenges in terms of training and keeping filers informed concerning changes to the requirements, as well as the additional resources required for review and tracking of PTRs and preparation for posting. Managing the large number of financial disclosure filers is also a challenge. Need better mechanisms or clearer

		<p>guidelines to ensure that the number of personnel filing confidential financial disclosure reports is limited to only those that truly meet the filing criteria and that adequate resources are available for timely review of the existing number of reports.</p>
<p>Department of the Interior</p>		<p>Funds to train a larger percentage of employees and for travel to provide onsite training\assistance to more employees. Ethics training needs to be mandatory for all employees.</p>
<p>Department of the Navy</p>		<p>Stock act implementation including web posting and continued training of filers.</p>
<p>Department of the Treasury</p>		<p>Implementing the web posting requirements of the STOCK Act if it becomes effective, will be a significant drain on limited staff, detracting from core training, counseling, and financial disclosure review responsibilities.</p>
<p>Department of the Treasury</p>	<p>Bureau of Public Debt</p>	<p>As a result of the consolidation of the Bureau of the Public Debt and the Financial Management Service into the Bureau of the Fiscal Service, we must consolidate both ethics programs into one cohesive ethics program containing the best elements of both ethics programs. We must take into consideration the training preferences of the employees in each of the legacy bureaus (e.g., live in-person training, on-line training, etc.). Also, we must consider the best way to train employees at multiple locations.</p>
<p>Department of the Treasury</p>	<p>Comptroller of the Currency</p>	<p>Updating an electronic system to track filings and integrating the system with an electronic submission and review process.</p>
<p>Department of the Treasury</p>	<p>Financial Management Service</p>	<p>There is much work yet to be done on combining the ethics programs of the two legacy bureaus. It entails evaluating and adopting best practices from each organization, and standardizing procedures and training vehicles to meet the needs of a diverse and geographically dispersed new bureau. This must be accomplished during a time of organizational change as work forces are consolidated, new missions are assigned and a major facility closes.</p>
<p>Department of the Treasury</p>	<p>Bureau of Engraving and Printing</p>	<p>Stretching limited resources to address an ever-expanding workload resulting from new requirements (such as those implemented by the</p>

		STOCK Act), new programs and functions, and a higher rate of employee turnover than in the past.
Department of the Treasury	Internal Revenue Service	Implementing the public reporting requirements of the STOCK Act.
Department of Transportation		Setting up a department-wide electronic filing system for filing financial disclosure reports.
Department of Veterans Affairs		Funding - Will be sufficient funding for staff, training and IT resources to manage the program STOCK Act - Full implementation of the Act will further challenge limited resources. Ethics Specialty Team - If implemented permanently, institutionalizing the team. For example, the ability of the organization to cope with extended absence of one of the small group of specialists.
Election Assistance Commission	N/A	A shrinking budget and shrinking staff poses a significant challenge.
Environmental Protection Agency		1) EPA will have 13 days of furlough. Of the three full time ethics employees, two also have "use or lose" annual leave this year. Consequently, we will inevitably face periods when we are stretched even more thinly than usual, possibly even with no full-time ethics official in the office on any given day. We have to figure out how to manage those gaps. 2) Many experienced ethics officials are retiring, leaving a "brain drain" behind. We have to educate their replacements. 3) We continue to struggle with managing our burgeoning workload and potential employee burnout. 4) We expect (and are experiencing) turnover among the political staff, but seriatim rather than all in a bunch. Consequently, there is no collective "push" by the White House or others to get the entire political cohort trained. We sense that the individual political people no longer have the attuned sense of responsibility or ownership over the Obama ethics pledge.

Export-Import Bank of the United States	N/A	Installation of an automated Financial Disclosure reporting system
Farm Credit Administration	N/A	(1) Continuing to address the fallout and concerns over the changes brought about by the Stock Act. (2) We will have a new Chairperson and a new Board Member over the 1-3 years. The nominee and training process for Board Members (who are PASs) is very time intensive. (3) We will continue to uphold the excellence of our ethics program while working in all other legal areas of OGC.
Farm Credit System Insurance Corp.	N/a	See challenges noted on report filed by Farm Credit Administration.
Federal Communications Commission		Upcoming transition of long term ethics staff members.
Federal Deposit Insurance Corporation		Downsizing.
Federal Energy Regulatory Commission		By mid 2013, we hope to implement electronic filing of financial disclosure forms. We also hope to be able to identify automatically (electronically) any company listed on a financial disclosure form that is on FERC's Prohibited Securities List.
Federal Housing Finance Agency		FHFA and FHFA-OIG continue to hire experienced employees. As such, expedited ethics screenings for actual and apparent conflicts of interest will be required to accommodate these employees. Additionally, as a result of this growth, the number of OGE-278 filers continues to increase.
Federal Labor Relations Authority	N/A	1. The STOCK Act posting requirements, if they come to pass for federal employees. 2. The DAEO's and Alternate DAEO's ability to juggle ethics responsibilities along with litigation, advisory, FOIA, and other duties.
Federal Mediation and Conciliation Service		Maintaining a first-class ethics program in the face of diminished financial resources and potentially fewer personnel.

Federal Reserve Board	N/A	<p>1. Updating to financial disclosure tracking systems.</p> <p>2. Providing Ethics training to all non-filer employees.</p>
Federal Retirement Thrift Investment Board		<p>The size of the Agency is slowly growing. As a result, the Office of General Counsel anticipates that the number of ethics opinions it writes will also grow. This will challenge the Office of General Counsel to increase the efficiency of its ethics program. In anticipation, the Agency has started to catalogue ethics opinions electronically and by subject matter. This will improve the accessibility and searchability of ethics opinions.</p>
Federal Trade Commission	Office of the General Counsel	<p>Although the Ethics Team is well known and regarded by most at the FTC (from senior leaders to unpaid volunteers), there are always some who aren't aware of (or don't care to use) the services we provide. Although it is always easier to connect with a willing participant, our goal is to provide ethics guidance to everyone who needs it. Broadening the base of well-sensitized FTC staff so that everyone seeks advice when they can put it to best use will continue to be a challenge.</p>
General Services Administration	N/A	<p>For our filers' protection, we are trying to ensure that no OGE Form 278 or OGE Form 278-T is posted online, pursuant to the Stock Act, without being reviewed, certified, and redacted. One of our greatest challenges will be to review, certify, and redact the OGE Form 278s and OGE Form 278-Ts within 30 days of receipt.</p>
Institute of Museum and Library Services	N/A	<p>With the government-wide priority of maximizing the use of telework arrangements, we will need to develop effective approaches to providing interactive agency-wide ethics training and carefully tailored ethics advice and counsel to agency managers and staff through technological means.</p>
Inter-American Foundation		<p>technology</p>

International Trade Commission		Preparing for the ADAEO's planned retirement in 3 years.
Millennium Challenge Corporation		Implementation of the Stock Act.
National Aeronautics and Space Administration		STOCK Act. Addressing issues arising through increased commercial partnership, increased workload due to new requirements, including the STOCK Act. Increased level of complexity such as implementing OGE's planned government-wide lobbyist gift ban.
National Credit Union Administration		Keeping up with employees who move to different jobs within the agency and their ethics filing/training requirements. Implementation of STOCK Act requirements and changing deadlines concerning those new requirements.
National Endowment for the Arts	N/A	One of the challenges was moving through the transition stage following the General Counsel/DAEO's retirement during the summer of 2012 and the ADAEO's move to OGE in September 2012 while managing other portfolios and going through the process of backfilling positions. An attorney who will also serve as ADAEO began work on 1/28/2013.
National Geospatial-Intelligence Agency (NGA)		Our full-time ethics attorney is on a 6 month rotation to support the WH

National Labor Relations Board		Retirement eligibility of senior personnel and ensuring knowledge capture and transfer takes place before departure of these individuals Providing a robust program to employees during a challenging budget era where resources devoted to the program may be limited Transitioning filers from a paper-based to an electronic filing system Continued implementation of the requirements of the Stock Act
National Science Foundation		1) Staffing limitations 2) STOCK Act compliance 3) Use of an OGE generated eFile system
National Security Agency		Our greatest challenge is developing an electronic financial disclosure management system. We don't have the budget to purchase and develop a system.
National Transportation Safety Board		Rationalizing staffing (see earlier response at Item 9); moving toward a word-searchable database of all contacts with employees; implementation of STOCK Act posting provisions; implementation of efficiencies in preparation of reports related to gifts; completing the process of implementing supplemental rules; staffing and coordinating potentially 3 PAS nominee/confirmation processes; and continuing to provide services during headquarters renovation while significant numbers of employees will be teleworking in 2013-2014.
Occupational Safety and Health Review Commission		Understanding and implementing STOCK ACT provisions Providing interactive ethics training for regional office employees
Office of Government Ethics		OGE is now requiring all filers, public and confidential, to e-file. As such, getting the DAEO, ADAEO and all filers comfortable with FDM and any subsequent e-filing system will be necessary. Also, OGE will need to sensitize any new employees to the Standards of Conduct.

Office of Management and Budget		See response to Q. 22.
Office of National Drug Control Policy		Succession planning
Office of Special Counsel		Transition to a new DAEO
Peace Corps	NA	Training for overseas staff; locating resources to develop online training modules; developing an electronic financial disclosure filing system.
Pension Benefit Guaranty Corporation		Implementation of statutory requirements of the STOCK Act – Continuing to provide new or creative ways of educating agency employees.
Postal Regulatory Commission		Moving to an e-file system for financial disclosure.
Railroad Retirement Board		Due to a retirement and a promotion, we have new ethics staff members who must learn the eithics rules and laws at a time when the legal staff is smaller and faces a more challenging workload.
Recovery Accountability and Transparency Board	n/a	The Board is scheduled to sunset on September 2013. We are currently advising employees of post employment restrictions. The question will be where they turn after the Board has ceased operations.
Selective Service System		Doing all that is required by OGE and ethics regulations, including new Stock Act requirements, as a collateral duty if a full time position.
Special Inspector General for Afghanistan Reconstruction		Utilizing the FDM electronic filing system, which has many design challanges.
Tennessee Valley Authority		Implementation and management of changing STOCK Act requirements.
Uniformed Services University of the Health Sciences		Compliance with ever changing guidance/standards on conference attendance and appropriate use of funds from a non-Federal source

24) Would you like to list the most significant emerging issues facing your ethics program in the next 1-3 years?*

() Yes **52**

() No **83**

If yes, please list them here:*

1: Agency	2: Subcomponent (if applicable)	If yes, please list them here:
Agency for International Development		Adapting to the STOCK Act requirements and effectively communicating those requirements to our filers. The eventual adoption of an electronic filing system.
Broadcasting Board of Governors		Keeping up with the the STOCK Act's continually changing disclosure and posting requirements is a challenge for ethics officials as well as the agency's public disclosure filers.
Chemical Safety and Hazard Investigation Board		Continuity of operations STOCK Act issues
Court Services & Offender Supervision Agency for DC		It would be ideal to review outside employment requests and financial disclosure forms electronically--the challenge lies in the costs of implementation.
Defense Commissary Agency	N/A	Ethics officials recommended and drafted a personalized letter to all agency employees at GS 15 grade and above giving emphasis to appearance of violation of Standards of Conduct signed by Director Jeu.
Defense Contract Audit Agency		1. Coordinated effort as to independence statements under the GAO auditing standards and financial conflict reporting with OGE 450s. 2. Continued coordination of timely reporting/identification of new entrants. 3. Succession planning for regional official's who assist in the OGE 450 process.

Defense Finance and Accounting Service		1. Complying with STOCK Act online reporting requirements 2. Migrating to the new online ethics management system being developed by OGE 3. Potential expansion of annual ethics training requirements
Defense Logistics Agency		(1) Continued implementation of the STOCK Act and educating our Public Filers; (2) Budget constraints; (3) Personnel turn-over.
Defense Threat Reduction Agency	N/A	The STOCK Act
Department of Agriculture		The most significant emerging issues facing USDA's Ethics Program are: (1) succession planning (three out of six of OE's senior leadership are retirement eligible, or will be retirement eligible within the next three years); (2) risk management concerns due to the long-term deleterious effects of prolonged budget constraints and the inability to hire additional staff; (3) a lack of staff resources to provide timely ethics guidance to USDA's numerous Federal Advisory Committees (the two OE employees who assisted USDA's Advisory Committees left the Department in December, 2012); (4) challenges in the implementation of new IT and STOCK Act requirements (OE also lacks IT employees dedicated to making necessary enhancements to OE's IT programs.)
Department of Health and Human Services		Agency-wide use of an electronic financial disclosure filing systems. Evolving ethical issues concerning social media. Financial disclosure report filing requirements associated with same sex marriages and implementation of the STOCK Act requirements.
Department of Homeland Security	U.S. Customs and Border Protection	1. As a law enforcement agency that has regular interaction with the public and with many employees located in remote areas of the country, having our officers and agents correctly issue-spot when an ethical issue comes into play. 2. Fine-tuning our new OGE 450 electronic filing process (Human Resources Business Engine (HRBE)) to best suit our notification and tracking needs related to the filing of new entrant and annual OGE

		450s.
Department of Homeland Security		Obtaining funding for additional staff.
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	The STOCK Act and the transition of pay demonstration project employees back to the GS system, which will require a large number of termination public financial disclosure reports to be filed.
Department of Justice	United States Trustee Program	The most significant emerging trend the United States Trustee Program continues to observe is the continued high in the number of unique and complex conflict of interest issues. Such issues require a broad understanding of how ethics laws intersect with professional responsibility rules, internal agency policy, human resources considerations and the unique issues presented by the practice of bankruptcy law.
Department of Justice	Executive Office for United States Attorneys	Compliance with the STOCK Act increases workload with no additional money or personnel: hiring freeze/decreased budgets; unable to hire more personnel to review and certify 278 reports.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	Determining the extent of on-going ethics guidance needed for Federal Advisory Committee members.

Department of Justice	Drug Enforcement Administration	Drafting more complex post-employment opinions, to include for those former DEA employees returning to the agency working for a contractor.
Department of Justice	Criminal Division	There is no succession plan. This will be a significant issue in the coming years.
Department of Justice	United States Trustee Program	The most significant emerging trend the United States Trustee program continues to observe is the continued high in the number of unique and complex conflict of interest issues. Such issues require a broad understanding of how ethics laws intersect with professional responsibility rules, internal agency policy, human resources considerations and the unique issues presented by the practice of bankruptcy law.
Department of Labor		-In light of budget constraints, utilizing web-based tools to increase greater outreach to agency
Department of State		Implementation of Stock Act - especially online posting of reports and monthly 278 Ts. Outreach to employees on the importance of Ethics.
Department of the Army		See answer to Q 23 above.
Department of the Interior		Revolving door for Ethics Officials who seek other employment. Impact of teleworking and remote management on ethical behavior.

Department of the Treasury		Public reporting under the STOCK Act, if ultimately implemented.
Department of the Treasury	Inspector General for Tax Administration	Coordination and communication difficulties with agency functions to identify filers, especially those in temporary/acting assignments to covered positions.
Department of the Treasury	Bureau of Public Debt	See response to Question 23.
Department of the Treasury	Comptroller of the Currency	STOCK Act.
Department of the Treasury	Bureau of Engraving and Printing	The growth in the number of contract employees who work side-by-side with Federal employees at our agency has led to an increase in questions and a heightened emphasis on the rules on gifts from outside sources and gifts between employees.
Department of the Treasury	Internal Revenue Service	Public reporting under the STOCK Act and implementing an electronic filing system.
Department of Transportation		Implementation of Stock Act requirements.

Department of Veterans Affairs		Research - VA has a statutory mission that includes research. Research presents a multitude of ethical issues for the Department and its employees who also frequently have appointments with the Universities that VA must affiliate with in order to fulfill its statutory mission of training the Nation's health care professionals.
Election Assistance Commission	N/A	See number 23 above.
Environmental Protection Agency		1) We expect administrative burdens associated with the OGE regulatory exemption regarding service on non profit boards as part of official duty. Those boards are informing their officers that it's a "done deal," but that's not true. We have to manage expectations consistent with our applicable statutory authority. 2) We face an increased burden due to the STOCK Act's requirement for periodic transactions. We have to deal with the paperwork administratively and also do reviews, which requires a lot of time.
Export-Import Bank of the United States	N/A	Additional administrative burden on static Ethics resources
Farm Credit Administration	N/A	Our recently-appointed Chairperson is interested in focusing on FCA's status as an arm's length, safety and soundness regulator. To this end, we will continue to provide training on the appearance standard and the types of communications with the regulated entity (the Farm Credit System) that are appropriate.
Farm Credit System Insurance Corp.	N/a	See issues noted on report filed by Farm Credit Administration.

Federal Communications Commission		Further implementation of Stock Act provisions.
Federal Deposit Insurance Corporation		Dodd-Frank legislation initiatives.
Federal Housing Finance Agency		Managing implementation of the STOCK Act will be a significant issue affecting FHFA's ethics program in the next 1-3 years.
Federal Labor Relations Authority	N/A	The STOCK Act posting requirements, if they occur.
Federal Maritime Commission		Consideration of whether to create supplemental standards of ethical conduct for employees of the agency.
Federal Reserve Board	N/A	1. Preparing for electronic filing of financial disclosure reports.
Federal Trade Commission	Office of the General Counsel	As stated above, limited resources (in terms of staffing and budgetary concerns) will continue to be a challenge for the FTC's Ethics Team, particularly in light of increased demands (primarily due to new legislation and an increase in requests for assistance from staff). The Ethics Team also hopes to implement new procedures so that the program will continue to operate at a high-level of success even if staffing changes occur (due to retirement, extended leaves of absence, or otherwise).
General Services Administration	N/A	The most significant emerging issue facing our ethics program is implementing an online filing and review system for the OGE Form 278 and OGE Form 278T, specifically training our filers on the use of the system.

Institute of Museum and Library Services	N/A	As more museum, library and research professionals are hired, ethics officials will have to learn how best to assist these employees in drawing clear ethical guidelines and distinctions that enable them to carry out their primary agency responsibilities, while they engage in outside activities (i.e., writing, teaching, speaking, etc.) that will advance or maintain their knowledge and professional influence in their chosen field of expertise.
Inter-American Foundation		time management technology
Merit Systems Protection Board		We have not identified any significant emerging issues facing our ethics program in the next 1-3 years.
National Aeronautics and Space Administration		Yes, issues posed by social and other electronic media and legislative or judicial resolution of STOCK Act online access requirements.
National Credit Union Administration		Outside employment and activities. We are currently working on a supplementary ethics reg so that outside employment and activities will be reported and treated consistently.
National Science Foundation		Constant influx of rotators
National Transportation Safety Board		Shifting the ethics program into the electronic age; rationalizing staffing; succession planning; continuing to streamline procedures to accelerate feedback; preparing supplemental regulations, to name some of them.
Office of Administration		Implementing Stock Act provisions.

Office of Government Ethics		OGE, like all agencies, is striving to comply with the new STOCK Act provisions as they continue to be amended and interpreted.
Office of Management and Budget		<p>There many issues that OMB's ethics program hopes to address in the coming 1-3 years. For example, converting the ethics program's documents, forms, and files to electronic formats will streamline client service and tracking efforts. Similarly, developing and implementing an electronic signature process is critically important. However, it is likely that the most significant challenges and emerging issues facing OMB will be the intersection of the STOCK Act (and to a lesser extent an appointee population with increasingly complex spousal portfolios and sophisticated financial instruments) and staffing needs over time, especially at surge times. The additional compliance requirements imposed by the STOCK Act are already generating numerous questions and substantial confusion on the part of staff, especially as, as just flagged, an increasing number of appointees present with high-profile professional spouses with complicated investment portfolios and trading activity of their own, portfolios and activity are frequently not immediately shared or communicated with the appointee. Likewise, the increased prevalence of complex family trust instruments, private equity or hedge fund assets that must be but are difficult to divest, and managed financial portfolios involving frequent transactions not always easily transparent to the filer on a monthly basis have all combined to increase the burden on filers and, by extension, OMB OGC's compliance oversight. Meanwhile, the increased public scrutiny implicit in the pending public posting requirement has and will in all likelihood continue to cause a sharp spike in filer and ethics reviewer time on the proper reporting of assets that, arguably, pose no danger of conflict. At certain junctures, the necessity of this investment of time has dominated OGC attention, delaying or preventing work on competing agency priorities (e.g., budget drills; compliance w/ FOIA deadlines). As result, filers with very complex portfolios and extremely lengthy Form 278s are increasing encouraged to hire accountants to assist. This has proved very successful thus far. Yet, with sequester-motivated furloughs and declining flexibility to hire additional staff just as the public posting deadline arrives on April 15, 2013, the Agency expects</p>

		the burdens will continue to rise before they get better.
Office of National Drug Control Policy		STOCK Act compliance
Office of Special Counsel		Transition to electronic records management system
Office of the Director of National Intelligence		STOCK Act compliance.
Pension Benefit Guaranty Corporation		PBGC has been hiring more and more experienced individuals from the private sector. These individuals often have fewer restrictions on what many consider to be day to day activities. Ensuring that they are aware of, and abide by, Federal ethics law and regulations is an ongoing challenge
Railroad Retirement Board		Staffing: Fewer people to handle an ever increasing workload.
Securities and Exchange Commission		The Stock Act and it's reporting requirements
Special Inspector General for Afghanistan Reconstruction		See the response to question 23.
Special Inspector General for Iraq Reconstruction		SIGIR is scheduled to sunset on March 23, 2013. Approximately 30 employees will be required to submit Termination 278 financial reporting forms. We do not know who will accept and review these forms after SIGIR sunsets.

Tennessee Valley Authority		Implementation and management of changing STOCK Act requirements.
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1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 2. Please indicate the question number to which the comment corresponds.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Chemical Safety and Hazard Investigation Board		Q. 22 -Program Audit by OGE
Consumer Financial Protection Bureau		Question 18: FY12 cost includes acquisition of the FDonline financial disclosure reporting system. Future FY costs will reflect annual licensing fees for filers, which will become a more steady state once CFPB's hiring levels off.
Defense Information Systems Agency	n/a	Question 18 Army is the Executive Agent for the financial disclosure electronic system used by DISA and will report the costs for all of DoD on its annual questionnaire.
Department of Agriculture		#18) For 2013, all of USDA's Public and Confidential financial disclosure filers will use the electronic filing system, thus the significant cost increase. In 2012, only the Public filers and a small sample of the Confidential filers utilized the electronic filing system.

Department of Defense		The Department of Defense currently utilizes the FDM system administered by the Department of the Army. Use of FDM is not currently mandatory within the DoD. We also do not have a figure as to how much a new electronic filing system will cost as a result of the implementaiton of the STOCK Act.
Department of Defense Office of the Inspector General	Office of General Counsel	Question 17.b. We hold internal Office of General Counsel (OGC) ethics meetings and discuss ethics issues at OGC staff meetings. We attend DoD Standard of Conduct Office (SOCO) meetings and DoD Financial Disclosure Management (FDM) electronic filing system meetings.
Department of Health and Human Services		Q17 - In addition to the ethics program reviews conducted by the OGC Ethics Division some Deputy Ethics Counselors (DECs) conducted assessments of their own programs. The National Institutes of Health (NIH) Ethics Office (NEO) conducts reviews of the ethics offices of the institutes and centers within NIH.
Department of Homeland Security	Federal Law Enforcement Training Center	Question #18: The FLETC does use the DOD FDMS and it is paid by the Department with the revolving fund.
Department of Homeland Security	U.S. Customs and Border Protection	18. With regard to FY 2012 actual costs and FY 2013 projected costs of utilizing FDM for our OGE Form 278 filers, the Department of Homeland Security covers such costs for CBP at this time. The projected costs for FY 2013 for using the Human Resources Business Engine (HRBE) for our OGE 450 filings is \$22,000. 20. New entrant OGE 450 filers get notifications prior to the filing deadline, however, due to natural delays in setting up and processing of payroll, there may not be a notification immediately provided upon entry to the position. 21. We have a directive for OGE 450 filings which will be updated to reflect new electronic filing procedures.
Department of Homeland Security	Secret Service	Question 20: We have been advised by our Human Capital Division that our agency's personnel system is unable to mark positions as being covered by the confidential financial disclosure requirements. Because we have a large number of special agents who are frequently reassigned between non-covered and covered positions, we encounter difficulties in being made aware of new entrants. We are continuing to work with the

		Human Capital Division to find a solution to ensure that we receive timely notification of new entrants.
Department of Homeland Security	Transportation Security Administration	Q. 18 & 19 - The Financial Disclosure Management electronic system is used under the auspices of DHS contract and only for Public Financial Disclosure filing. Q. 20 - During the year 2012 we worked to strengthen our relationships with our Office of Human Capital and continue to refine methods to receive timely notification of all new entrant and departing employees. Although the notification system is not as timely as we would like, we are generally receiving information in a timely manner.
Department of Homeland Security	Immigration and Customs Enforcement	18. DHS / ICE uses the FDM system for OGE 278 forms only. OGE 450 forms are still collected using paper format. 20. We often receive timely notice of new entrant employees for financial disclosure reports, but this process has been known to have issues with delays in notification and reporting if the ICE components with responsibility to notify the ICE Ethics Office have their own administrative issues.
Department of Homeland Security	Federal Emergency Management Agency	#20 - For New Public Disclosure (OGE278) Filers only.
Department of Homeland Security	Office of Inspector General	Q.20. We receive timely notification of employees newly hired into reportable positions, but rely solely on managers to alert us when employees are promoted into such positions.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 17- A comprehensive agency ethics program self-assessment is scheduled for FY2013 to be conducted by HQ ethics staff.
Department of Justice	Executive Office for United States Attorneys	Q 25: EOUSA is unable to pull the actual costs for 2012 and its projected costs for 2013 because our Case Management Staff has one budget for numerous systems that support EOUSA and the USAOs. All of these systems share servers and IT staff such as contractors, developers, and project managers to a helpdesk, and the

		individual costs for each system is not tracked.
Department of Justice	Federal Bureau of Investigation	Q 27: The HR Division SES Unit sends notification to OIC concerning new SES and SL filers. OIC also sends quarterly emails to each division about the filing requirement of employees "Acting" in SES or SL positions. While identifying employees in "Acting" positions has improved, it remains a challenge.
Department of the Air Force		Question 18. We use the Army FDM program. The Army is the DoD executive agent for this process and the costs are shared at a DoD level. Question 20. We receive notification of the new entrant employees who are required to file financial disclosure reports via our Personnel Office and supervisors or designated ethics officials from within the new employee's unit. Further, we monitor in-processing briefings for all new employees to assess and remind new employees that if their duties warrant, they may need to be a file and should inquire to their supervisors if not previously designated as a filer.
Department of the Army		Q16 – Responses reflect majority answers from activities Army wide. At HQ levels, time spent for Public Financial Disclosure, Advice & Counseling, Education & Training, SGE Activities & Development of IT Applications is significantly higher.
Department of the Navy		Q 18, The Department of the Army funds FDM for all the services. The Navy does not have any cost data.
Department of the Treasury	Bureau of Public Debt	20. Overall we received timely notification, but in one instance we did not receive notification. We noticed the error as a result of compiling information for this questionnaire.
Department of the Treasury	Bureau of Engraving and Printing	Q #25 - The agency implemented a requirement for all new entrant employees at its headquarters to complete online ethics training as part of the Treasury Learning Management System before assuming the duties of their new positions.
Department of		Question #18: The FAA uses an electronic financial

Transportation		disclosure system and the cost is: FY2012 actual costs - \$144,000 FY2013 actual costs - \$246,000
Export-Import Bank of the United States	N/A	<p>Q 20: Because of high turnover in Human Resources Department, we have not always have timely notification. Q 21: We are in the process of implementing a program for electronic filing of Financial Disclosure which we expect to be up and running in the spring of 2013 and will be available for 450 filers next year as well. Q 23: The greatest challenge facing our Ethics program in the next 1-3 years is having sufficient staffing. The Bank has a very robust Ethics program with almost 300 filers (75% of staff), a large number of Political Employees and complex financial disclosure issues. Ethics is handled by the Administrative Law group which is responsible for all regulatory and compliance issues and only has four lawyers, including the group head (ADAEO). Ideally, two attorneys would be devoted to Ethics full time, but with other work demands this is not possible. It is not clear whether the Bank's budget will include another FTE for the Admin Law group.</p>
International Trade Commission		<p>We have a system that should allow regular timely notification of new employees. We have had some difficulty receiving accurate and timely notification this year. Apparently, the HR employee responsible for the report has been ill. I have contacted HR again and another person is providing the reports and, thus far, they have been good.</p>
Merit Systems Protection Board		<p>On January 26, 2012, OGE issued its final report based on its review of our ethics program in December 2011. The report indicated that our program appeared to be effectively administered and in compliance with applicable laws, regulations, and policies. In CY 2012, we followed the same standards and procedures that were reviewed by OGE in 2011.</p>

Morris K. Udall Foundation		As a new DAEO, just getting up to speed was the principal focus of 2012. I do not yet feel qualified to estimate challenges and issues.
National Aeronautics and Space Administration		Item 20. Timely notification of new OGE new entrant filers was noted as a concern in NASA's OGE Program Review. System improvements to correct this have already been instituted in NASA's Ethics Program Tracking System (EPTS).
National Credit Union Administration		17. The assessment we did was on one of our regional office's ethics program. 18. As noted above, we are about to implement the FDM electronic financial disclosure system. We anticipate cost for 2013 to be approximately \$30,000 for the outside contractor. Internal costs (employee time spent to prepare for system roll out, etc.) is not included.
National Endowment for the Arts	N/A	The NEA experienced significant shortages among permanent staff in the Office of General Counsel during the second half of 2012. The staff of four was cut in half and then reduced to one permanent staff person for several weeks. As of 2013 we are now back up to three permanent staff members and one legal fellow who work on various aspects of ethics related matters.
National Labor Relations Board		Question 25: The NLRB uses an electronic financial disclosure system called FDOonline offered by the National Technical Information Service, Department of Commerce, for filers of the OGE Form 450 (Confidential Financial Disclosure Report) only.
National Science Foundation		#19 - Automated tracking system is part of eFile system

Office of Management and Budget		Q20: As part of OMB's efforts to prepare the agency's forms for posting to the internet, in compliance with section 11 of the STOCK Act, OMB OGC identified improvements in the process to provide timely notification of new entrant employees to OGC, which have now been implemented. Q21: OMB provides annual notification and reminder emails to filers, with guidelines for filing and reporting. More comprehensive written guidance in light of the STOCK Act is under development for 2013.
Office of the Director of National Intelligence		Number 18 - response should be "N/A" for both.
Surface Transportation Board		This response generally applies to Nos. 22-24: The Board is a small and close-knit agency where everyone knows each other. Currently, the Board has a culture of high job satisfaction and conservative ethics ideals. We have no outside travel payments, and the Board pays for meals when employees are out-of-town even though the WAG exception for such meals would otherwise apply. The Board has a very limited event budget. It also regulates a specific industry with substantial transparency. The Board's ethics staff is diligent and consistently provides relevant ethics information to all Board employees. While the ethics staff deals with a number of ethics questions a week, the vast majority of ethics issues that arise are routine and show the diligence of the Board's employees with regard to ethics matters. That said, the Board is open to improving its program, and its staff looks forward to feedback from the current audit, which OGE began in December 2012.

PART 3. EDUCATION AND TRAINING

25) Initial Ethics Orientation*

Number of employees required to received IEO: 278,314

Number of employees who received IEO: 280,558

26) Is initial ethics orientation part of your agency's in-processing process for new employees?*

() Yes 131

() No 4

27) How do you deliver initial ethics orientation to new employees? Check all that apply.*

[] Classroom instruction 80

[] Instructor-led web-based 7

[] Self-paced web-based 39

[] Video 24

[] Satellite broadcast/videoconference 12

[] Other (specify) 81

1: Agency	2: Subcomponent (if applicable)	27: Other (specify):How do you deliver initial ethics orientation to new employees? Check all that apply.
Access Board		Individual briefing
Administrative Conference of the United States	N/A	New employee ethics manual followed by individual counseling, if questions remain

Advisory Council on Historic Preservation	N/A	See "Additional Comments," below.
Agency for International Development		New employees are provided with a copy of the Standards of Conduct by HR on their first day at USAID.
Alaska Natural Gas Transportation Projects		Summary in-person briefing about ethics in general to include an introduction to the web-based training.
American Battle Monuments Commission		One-on-one during in-processing
Appalachian Regional Commission		personal conversation with materials
Appraisal Subcommittee		one on one meeting
Armed Forces Retirement Home		Ethics Binder
Armed Services Board of Contract Appeals		One-on-one discussion and handouts
Barry M. Goldwater Scholarship & Excellence in Education Foundation		Individual briefings, written material from OGE, verbal communication with OGE as appropriate/required
Broadcasting Board of Governors		New employees are provided a printed copy of the Standards of Conduct and the 14 General Principles
Central Intelligence Agency		computer based initial ethics orientation is a required part of new entrant employee training
Chemical Safety and Hazard Investigation		Individual instruction and web based programs

Board		
Christopher Columbus Fellowship		N/A
Commission for the Preservation of America's Heritage Abroad		Individual instruction
Commission of Fine Arts		one on one, as needed for a micro-agency
Committee for Purchase from People Who Are Blind or Severely Disabled		Personal discussion with DAEO
Commodity Futures Trading Commission		in-person ethics training
Corporation for National and Community Service		PowerPoint sent by email to all new entrants.
Council of Economic Advisers		New employees receive their initial orientation as they on-board, sometimes one-on-one, sometimes in small groups, depending on their start date
Defense Finance and Accounting Service		Written materials complying with the requirements of 5 C.F.R. § 2638.703 are provided by email to all new employees at sites without qualified ethics instructors.
Defense Logistics Agency		one-on-one training; copies of standards of conduct and other helpful material provided during orientation
Defense Security Service		Distribution of written materials
Defense Threat Reduction Agency	N/A	Written ethics training is provided via email at entry on duty.
Denali Commission		ad hoc; New hiring is almost non-existent

Department of Commerce		See Comments Box.
Department of Defense		Written materials.
Department of Education		New Employees in the Regions receive written materials.
Department of Homeland Security	U.S. Customs and Border Protection	New employees in the Washington, D.C. area and in some field locations receive in-person ethics training, which was held every two weeks until hiring slowed, and now it is held when there are 10 new employees. All new employees are referred to the CBP website, www.cbp.gov, and are instructed to review the required ethics information within the first month of their starting date.
Department of Homeland Security		Written materials.
Department of Homeland Security	Secret Service	Written materials
Department of Homeland Security	Transportation Security Administration	distribution of written materials
Department of Homeland Security	Citizen and Immigration Services	One on One Counseling
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Written material- OIG
Department of Justice	United States Parole Commission	New employees attend DEO-provided training.
Department of Justice	Foreign Claims Settlement	Instruction provided by DOJ-DEO (classroom instruction)

	Commission	
Department of Justice	United States Trustee Program	When new employees start in the Executive Office for United States Trustees in Washington DC, they attend a live ethics orientation session presented by the DEO. When new employees start in field offices, they are given written materials and instructed to review the materials, ask questions and certify when they have completed.
Department of Justice		Classroom instruction is supplemented with review of materials/self-certification in some instances
Department of Justice	United States Marshals Service	written materials on web site
Department of Justice	Criminal Division	If a new employee is unable to attend live training within 90 days he is provided with materials to review. After review, the employee discusses ethics materials with the DDAEO.
Department of Justice	United States Trustee Program	When new employees start in the Executive Office for United States Trustees in Washington DC, they attend a live ethics orientation session presented by the Department of Justice Ethics office. When new employees start in field offices, they are given written materials and instructed to review the materials, ask questions and certify when they have completed.
Department of Labor		include the DOL handout in the EOD package
Department of the Army		written materials
Department of the Interior		Ethics Guide & Written Instructions
Department of the Navy		Written materials

Department of the Treasury	Bureau of the Mint	Distribution of written materials
Department of the Treasury	Bureau of Public Debt	Handouts
Department of the Treasury	Office of Inspector General	Written documents
Department of the Treasury	Alcohol and Tobacco Tax and Trade Bureau	Ethics Materials
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	Acknowledged receipt and review of written materials
Department of the Treasury	Financial Management Service	Distribution of Ethics Handbook and other handouts
Department of Transportation		Written materials provided for review, web-based and one-on-one training.
Export-Import Bank of the United States	N/A	written materials
Federal Housing Finance Agency		All new entrant orientation sessions are conducted in-person and structured to be interactive.
Federal Labor Relations Authority	N/A	Hard copy training; one-on-one meeting; or group meeting, depending on the positions of the new employees.

Federal Maritime Commission		Consistent with 5 CFR 2638.703(a)(2), new employees are given a summary of the Standards of Ethical Conduct for Employees of the Executive Branch, Principles of Ethical Conduct, and contact information for the agency DAEO. Employees are given at least one hour of official duty time in which to review the Standards of Conduct, either in hard copy or via the agency intranet. Employees are given 90 days within which to complete their review, and they sign and date an acknowledgment form.
Federal Mediation and Conciliation Service		Individual briefings.
Federal Mine Safety & Health Review Commission		Written materials
Federal Reserve Board	N/A	One-on-one training
Federal Trade Commission	Office of the General Counsel	Ethics Training Materials Manual
Harry S. Truman Scholarship Foundation		Individual session with materials
Institute of Museum and Library Services	N/A	Written ethics material (self-paced)
Inter-American Foundation		one-on-on training
International Boundary and Water Commission		OGE materials at self paced due within 30 days.
International Joint Commission		

International Trade Commission		Training materials such as EO 12674, Standards of Conduct, and conflict of interest statutes
James Madison Memorial Fellowship Foundation		through our servicing agency - NBC
Japan-US Friendship Commission		Executive Director provides instruction
Morris K. Udall Foundation		Printed materials
National Aeronautics and Space Administration		New employees are given a website containing the required initial training materials. Standards of conduct are given to employees and written materials.
National Capital Planning Commission	N/A	New hires are given a copy of the Standard of Ethical Conduct for Employees of the Executive Branch on their initial date of entry; sign a Certification of Receipt of the Standards of Ethical Conduct; and receive one hour of duty time to review. New hires are also introduced to the DAEO on their date of entry.
National Credit Union Administration		Primary is self-paced web-based

National Endowment for the Arts	N/A	In-person training
National Endowment for the Humanities		In-person ethics orientation meeting (one-on-one, or small group) with ADAEO or other ethics attorney
National Mediation Board		one on one meeting with employee
National Security Staff		In-person
National Transportation Safety Board		Pre-employment interview/ethics brief as well as the noted web-based training module, required within 30 days of arrival
Occupational Safety and Health Review Commission		Via telephone
Office of Government Ethics		Distribution of written materials during one-on-one briefings.

Office of Management and Budget		EOP-wide in-processing involves standardized ethics training for all new staff, which is then augmented in the majority of cases – and in every case of a 278 filer – by additional contact w/ OMB OGC regarding the 278 and any related conflicts or appearance concerns
Office of Navajo and Hopi Indian Relocation		Individual meeting with DAEO
Office of Special Counsel		New employees are given information to review and time to do so; they must certify that they will comply with the Standards of Conduct
Office of the US Trade Representative		Handouts
Office of the Vice President		We provide one-on-one initial ethics orientation to each new employee
Peace Corps	NA	Written
Pension Benefit Guaranty Corporation		One on one for certain senior employees
Postal Regulatory Commission		As needed. Review of written orientation materials.
Presidio Trust		OGE provided web-based training, specific education/reading materials
Railroad Retirement Board		They are given written ethics materials and official time to review them.
Selective Service System		Our HR office provides printed OGE training material
Small Business Administration	N/A	One on one counseling for senior level officials
Special Inspector General for Iraq Reconstruction		One on one orientation by DAEO.

Surface Transportation Board		The Deputy Ethics Official gives a 15-minute verbal presentation to new employees on their first day, which is tailored to their position. In addition to the required materials and acknowledgments, new employees are provided with a 35-slide new employee ethics presentation for review on their personal computers. New employees that are required to file financial disclosure reports also receive a video of the last annual ethics training for filers to review on their personal computers.
Tennessee Valley Authority		New officers receive one on one instruction.
Uniformed Services University of the Health Sciences		One on One conversation and distribution of Standards of Ethics packet
US Trade and Development Agency		USTDA provides hardcopies of ethics training materials to each new employee to study at his/her own pace.

28) Who provided the IEO training materials? Check all that apply.*

My agency **114**

OGE **58**

Other (specify) **21**

1: Agency	2: Subcomponent (if applicable)	28: Other (specify):Who provided the IEO training materials? Check all that apply.
Appraisal Subcommittee		We took information from OGE website and modified it a bit.
Armed Forces Retirement Home		US Army JAGS Ethics Course
Armed Services Board of Contract Appeals		DoD SOCO
Commission of Fine Arts		DOI Personnel office (BSEE)
Commission on Civil Rights	n/a	

Committee for Purchase from People Who Are Blind or Severely Disabled		Combination of materials
Defense Finance and Accounting Service		DoD Standards of Conduct Office (SOCO)
Department of Homeland Security	Office of Inspector General	DHS HQ trains new employees in person, but the OIG provides access to online materials for new employees in field offices.
Department of Justice	United States Parole Commission	DEO
Department of Justice	Foreign Claims Settlement Commission	DEO
Department of Justice	Antitrust Division	Departmental Ethics Office
Department of Justice	United States Trustee Program	
Department of State		USAID Regional Legal Advisers
Department of the Interior		Human Resources

Department of the Treasury	Bureau of Public Debt	Office of Legal Counsel (Hatch Act and Social Media FAQs - April 4, 2012)
Department of the Treasury	Financial Crimes Enforcement Network	We conduct in-person new employee ethics training that is developed by the FinCEN ethics officials. We also electronically distribute the Treasury Ethics Handbook and other FinCEN materials to training attendees.
International Joint Commission		State Department
James Madison Memorial Fellowship Foundation		NBC
Merit Systems Protection Board		USDA website
National Aeronautics and Space Administration		New employee orientation slides; and ARC Human Capital.
National Credit Union Administration		We worked with an outside contractor several years ago to produce the self-paced web-based training.

National Transportation Safety Board		For many years, the Environmental Protection Agency has provided us with copies of their on-line training modules, which we have adapted for our use.
Office of Management and Budget		The EOP supplies the materials for on-boarding of EOP staff in every component.
Office of the US Trade Representative		EOP Office of Administration
Pension Benefit Guaranty Corporation		EPA - Modified EPA's Ethics Training to Fit PBGC Needs
Special Inspector General for Iraq Reconstruction		Department of Defense
Uniformed Services University of the Health Sciences		DoD Standards of Conduct Office

29) Annual Ethics Training: (Include SGE filers^[nes4])*

	Required	Received
Public filers (OGE Form 278) – PAS	1616	1633
Public filers (OGE Form 278) - non-PAS	20796	22256
Confidential filers (OGE Form 450)	312308	320944
Others (file alternative forms)	70820	115061
TOTAL	430103	459885

30) How do you deliver annual ethics training to employees? Check all that apply.*

Classroom instruction **99**

Instructor-led web-based **18**

Self-paced web-based **75**

Video **40**

Satellite broadcast/videoconference **25**

Other (specify) **48**

1: Agency	2: Subcomponent (if applicable)	30: Other (specify):How do you deliver annual ethics training to employees? Check all that apply.
Access Board		Written materials for SGE's
Administrative Conference of the United States	N/A	
Advisory Council on Historic Preservation	N/A	A letter to SGEs briefing them on conflict of interest, the Principles of Ethics, and the Hatch Act.
Agency for International Development		Quizzes, Regional Legal Advisor outlines, slide presentations
Alaska Natural Gas Transportation Projects		An ethics briefing is provided during the agency's annual strategic planning session.
Appraisal Subcommittee		Annual training is set up when all employees will be in DC area. Training is approximately 90 minutes with handout and Q&A session
Arctic Research Commission		reference and review OGE-provided materials
Armed Services Board of Contract		Powerpoint slides provided by DoD SOCO

Appeals		
Barry M. Goldwater Scholarship & Excellence in Education Foundation		Individual contact; 2 person micro-agency
Broadcasting Board of Governors		Provision of written materials and training prepared by agency ethics officials
Christopher Columbus Fellowship		N/A
Commission for the Preservation of America's Heritage Abroad		Meeting
Commission on Civil Rights	n/a	Emailed written training materials to employees for review and required email confirmation from employees that they reviewed the materials.
Committee for Purchase from People Who Are Blind or Severely Disabled		Combination of written materials & web-based
Defense Finance and Accounting Service		In-person one-on-one desktop ethics briefings for all OGE 278 Filers
Department of Homeland Security		Written materials
Department of Homeland Security	Secret Service	written materials
Department of Homeland Security	Transportation Security Administration	teleconference of instructor-led classroom instruction

Department of Homeland Security	Federal Emergency Management Agency	FEMA Ethics Guide and Podcasts are also available to all employees.
Department of Homeland Security	Citizen and Immigration Services	Broadcast messages sent to ALL employees
Department of Justice	United States Parole Commission	Employees attend DEO classroom training sessions.
Department of Justice	United States Trustee Program	LiveMeeting
Department of Justice	United States Trustee Program	LiveMeeting
Department of Labor		teleconference
Department of State		One on one briefings as requested
Department of the Army		written materials
Department of the Interior		Self-certification & written materials

Department of the Treasury		one-to-one briefings
Department of the Treasury	Bureau of the Mint	Written training in accordance with 5 C.F.R. 2638.705(c)(2)
Department of the Treasury	Bureau of Public Debt	Individual Briefings
Department of Transportation		Written materials
Department of Veterans Affairs		
Environmental Protection Agency		in person training
Export-Import Bank of the United States	N/A	written materials
Federal Deposit Insurance		written materials

Corporation		
Federal Labor Relations Authority	N/A	supplementary documents, including applicable statutes, regulations, and principles
Federal Reserve Board	N/A	One-on-one training
Harry S. Truman Scholarship Foundation		Group instruction or distributed memos
Institute of Museum and Library Services	N/A	Written ethics materials (self-paced)
International Joint Commission		Conference Call training
International Trade Commission		Used power points and played a game reinforcing the information from the power points. We make a video of one of the in-person sessions so that persons unable to make any of the 10 in-person sessions can view the class and then certify they viewed the video. They are also required to answer a question about the video.
James Madison Memorial Fellowship Foundation		document review - internet resources
Marine Mammal Commission		Booklets

National Endowment for the Arts	N/A	Quizzes
National Endowment for the Humanities		Self-paced written training materials provided via e-mail
National Mediation Board		articles sent via e-mail.
Office of Administration		In person Ethics training for 278 filers.
Office of Government Ethics		Written materials distributed both in person and to SGEs.
Office of Management and Budget		Written training materials prepared by OMB OGC.
Office of National Drug Control Policy		paper training for limited make ups
Office of the US Trade Representative		Individual Briefings
Office of the Vice President		Distribution of written materials. Individual briefings.
Peace Corps	NA	

Pension Benefit Guaranty Corporation		One on One Ethics training with SGEs, including telephonic training for teleworking employees
Presidio Trust		Regular topic specific memoranda, OGE web-based tutorials
Recovery Accountability and Transparency Board	n/a	written materials
Small Business Administration	N/A	Written materials to some 450 filers
Special Inspector General for Afghanistan Reconstruction		Written materials
Tennessee Valley Authority		In certain situations we provide one on one instruction.

31) Who provided the annual training materials? Check all that apply.*

My agency **115**

OGE **47**

Other (specify) **33**

1: Agency	2: Subcomponent (if applicable)	31: Other (specify): Who provided the annual training materials? Check all that apply.
Administrative Conference of the United States	N/A	Other agencies' online training modules
African Development Foundation		Ethics official from GSA; OSC Hatch Act attorney.
Appraisal Subcommittee		Information from OGE website that has been modified.
Armed Services Board of Contract		DoD SOCO

Appeals		
Chemical Safety and Hazard Investigation Board		training includes web based traing materials
Christopher Columbus Fellowship		N/A
Committee for Purchase from People Who Are Blind or Severely Disabled		Combination of materials
Commodity Futures Trading Commission		Office of Special Counsel
Defense Finance and Accounting Service		DoD Standards of Conduct Office (SOCO)
Defense Information Systems Agency	n/a	DoD SOCO
Defense Logistics Agency		DoD Standards of Conduct Office
Defense Threat Reduction Agency	N/A	DoD Standards of Conduct Office
Department of Defense Office of the Inspector General	Office of General Counsel	The DoD Standards of Conduct Office.
Department of Homeland Security	Federal Law Enforcement Training Center	
Department of Justice	United States Parole	DEO

	Commission	
Department of Justice	Civil Division	DDAEO and her assistants
Department of Justice	Tax Division	Additional tax-specific materials
Department of Justice	Criminal Division	DDAEO edited materials to make them more relevant to the Criminal Division
Department of State		USAID RLA's
Department of the Air Force		DoD Standards of Conduct Office
Department of the Treasury	Financial Crimes Enforcement Network	We conducted in-person annual ethics training for FinCEN supervisors and managers in 2012. That training consisted of a lecture and interactive game that was developed by FinCEN ethics officials.
Equal Employment Opportunity Commission		Dept. of Agriculture
Federal Maritime Commission		Online training module, "Ethics Sweepstakes," provided by USDA.

Federal Trade Commission	Office of the General Counsel	We used web-based material from the USDA
Inter-American Foundation		Dept. of Agr. annual ethics training
International Boundary and Water Commission		USDA Website
International Joint Commission		U.S. Department of Agriculture
International Trade Commission		The idea and basic structure of the game came from GSA
Merit Systems Protection Board		U.S. DOJ video
Morris K. Udall Foundation		USDA web training
National Credit Union Administration		We used a DOJ ethics training video, incorporating portions into our classroom training.
National Geospatial-Intelligence Agency (NGA)		Hatch Act training was given by OSC

National Transportation Safety Board		TheEnvironmental Protection Agency,for on-line training, whose materials we also use for new employee training. We have developed our in-person training with the help of a Department of Defense template
Office of the Vice President		White House Counsel's Office
Postal Regulatory Commission		Web-based tutorials prepared by other agencies.
Special Inspector General for Iraq Reconstruction		Department of Defense
Uniformed Services University of the Health Sciences		DoD Standards of Conduct Office
US Trade and Development Agency		Other federal government agency such as the Department of Navy's ethics program

32) Which group did you target for additional, specialized ethics training? Check all that apply.*

Contractors **16**

Procurement Officials **43**

Supervisors **34**

None **53**

Other (specify) **53**

1: Agency	2: Subcomponent (if applicable)	32: Other (specify): Which group did you target for additional, specialized ethics training? Check all that apply.
Arctic Research Commission		ourselves
Armed Forces Retirement Home		Agency personnel
Broadcasting Board of Governors		Special Government Employees, Senior Executive Service employees
Central Intelligence Agency		ethics briefings to specific Agency officers when asked; financial disclosure training for reviewers
Consumer Financial Protection Bureau		Employees in Technology & Innovation, Examinations, and Enforcement team
Corporation for National and Community Service		Grant program officers, staff reviewers for grant applications.
Council on Environmental Quality		All CEQ employees
Department of Agriculture		Human Resources, State Ethics Contacts, Seasonal Employees, Research Leaders

Department of Commerce		U.S. Foreign and Commercial Service employees and locally engaged staff of the U.S. Foreign and Commercial Service, International Trade Administration.
Department of Defense Office of the Inspector General	Office of General Counsel	We target auditors, special agents, and supervisors for specialized ethics training during component training events.
Department of Health and Human Services		Grant Specialists, Grant Officers, Senior Staff, Supervisory Administrative Law Judges, IPA's Fellows and Interns.
Department of Homeland Security	Federal Law Enforcement Training Center	Senior Executive Staff
Department of Homeland Security	U.S. Customs and Border Protection	Ethics training for Container Security Initiative (CSI) Officers and Immigration Advisory Program (IAP) employees assigned to foreign duty locations.
Department of Homeland Security	U.S. Coast Guard	
Department of Homeland Security		Political Appointees and members of the acquisition workforce.
Department of Homeland Security	Secret Service	Employees not otherwise required to receive ethics training who participate in agency-conducted training programs/meetings.
Department of Homeland Security	Transportation Security Administration	Information Technology; Security Technology; Senior Executives
Department of Homeland Security	Office of Inspector General	The Office of Audits received training on the Hatch Act.

Department of Homeland Security	Citizen and Immigration Services	Employees detailed or assigned to work overseas, SGE's, Immigration Service Officers, Grantees, Senior Leadership.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Grant review teams receive HUD Reform Act training before scoring grant applications.
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	Public filers (re: STOCK Act and 18 USC 207 issues)
Department of Justice	Civil Division	Public Filers
Department of Justice		HR, Facilities, Component Heads, Ethics Officials
Department of Justice	Executive Office for United States Attorneys	EOUSA/GCO office meets regularly with the EOUSA Procurement Staff to provide advice and training.
Department of Justice	Federal Bureau of Investigation	Legal Attaches overseas
Department of Justice	Office for Justice Programs and Office on Violence Against Women	OJP's attorneys in the GCO.

Department of Justice	Drug Enforcement Administration	Seeking/Post-employment Training at Retirement Seminars; Outside Employment Training to all employees approved for outside employment; Purchase Cardholder Ethics training; and applicability of conflict of interest laws to DEA Task Force Officers.
Department of Justice	Criminal Division	DDAEO provides specialized ethics training to sections
Department of Labor		Ethic matters related to election-year training
Department of State		Consular Affair Ajudicators
Department of the Air Force		Senior Employee Aides, Executive officers and personal assistants; Spouses of General Officers
Department of the Army		Senior Official Staff
Department of the Interior		New employees & employees not required to file
Department of the Navy		
Department of the Treasury		Political appointees for Hatch Act briefings; specific post-employment training/briefings were provided to many Treasury offices and filers. Specific training on Secs. 208 and 2635.502 was provided to various Main Treasury offices.

Department of the Treasury	Bureau of Public Debt	Executive Board - focused on ethics issues, which can arise in an organization that is consolidating.
Department of the Treasury	Comptroller of the Currency	new managers
Department of the Treasury	Financial Crimes Enforcement Network	Managers
Department of Transportation		Special government employees, employees not required to attend annual training, officials with grant authority.
Department of Veterans Affairs		Researchers and Attorneys.
Environmental Protection Agency		public filers (for STOCK Act)
Export-Import Bank of the United States	N/A	Board members and Political Appointees

Federal Communications Commission		Student Interns
Federal Energy Regulatory Commission		All FERC employees are required to take our annual ethics training.
Federal Housing Finance Agency		Provided special sessions for the Office of Congressional Affairs and Communications as well as outstationed employees of the Division of Bank Regulation.
Federal Reserve Board	N/A	Seeking employment training; overview of conflicts of interest for new hires; training with division administrators regarding overview of steps in designating a confidential financial disclosure filer; post-employment; division-specific training
General Services Administration	N/A	OGE Form 278 filers on the Stock Act
Institute of Museum and Library Services	N/A	Program Officers
International Boundary and Water Commission		All CORs
International Trade Commission		Confidential Assistants to the Commissioners and the Judges
Millennium Challenge Corporation		Senior Staff

National Aeronautics and Space Administration		scientists, non-career appointees, financial management, public affairs, center planning and development office, source boards, interns, COTR's, program support employees.
National Endowment for the Arts	N/A	Council members (SGEs) receive initial in person ethics training when appointed to the Council. They also receive annual ethics training.
National Endowment for the Humanities		Division directors, program staff and SGEs
National Geospatial-Intelligence Agency (NGA)		all NGA military and civilian employees
National Science Foundation		Admin staff who prepare sponsored travel requests and contractors who review travel expense reports in conjunction with sponsored travel
National Security Agency		Academic Outreach
National Transportation Safety Board		PAS
Nuclear Waste Technical Review Board		Special Government Employees

Office of Government Ethics		Administrative/IT personnel
Office of Management and Budget		High-ranking political appointees and individuals who could not attend classroom or small-group training sessions.
Office of National Drug Control Policy		SF 278 filers STOCK Act compliance training
Office of Science and Technology Policy		IPAs
Office of Special Counsel		all staff
Office of the US Trade Representative		Political Appointees
Office of the Vice President		We targeted 278 filers for training on the requirements of the STOCK Act.
Pension Benefit Guaranty Corporation		SGEs
Presidio Trust		Executive Assistants, Procurement Staff and Human Resources staff also receive 278/450 annual ethics training
Small Business Administration	N/A	All of our political appointees
Social Security Administration		ALJ
Special Inspector General for Iraq Reconstruction		Investigative agents

Surface Transportation Board		We provide yearly training for members of the Board's one non-FACA committee.
US Postal Service		Executive Assisitants to Officer of Postal Service

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 3. Please indicate the question number to which the comment corresponds.
Advisory Council on Historic Preservation	N/A	Question 27: Consistent with our training plan, the DAEO: 1. Personally introduces himself to the new employee and indicates the identity of the Alternate DAEO; 2. Informs the new employee that he, or the ADAEO in his absence, is the person to contact regarding any ethics inquiries; and 3. Provides the new employee a copy of "Do It Right," and explains that the new employee can use an hour of official time to read through the booklet. Question 29: There are several heads of other federal agencies (and their designees) who serve on our board. The ethics officials at their respective agencies handle their training. Therefore, we have not included their numbers in our answers to this Part.
Agency for International Development		11 filers (2 non-PAS public and 9 confidential) were away on extended medical/maternity leave and were unable to be trained. We are tracking their return, and they will be trained immediately upon their return to post.

Alaska Natural Gas Transportation Projects		None.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Commission on Civil Rights	n/a	#25 Initial ethics training number includes SGEs. #29 OGE 278 - Three of the nineteen OGE 278 filers left the Commission during 2012 prior to receiving annual ethics training. Other Filers – These filers are SGEs on FACA committees. In most cases, the SGE missed the meeting which included ethics training, or the meeting had to be cancelled.
Consumer Financial Protection Bureau		Question 25: The total number of employees who received ethics training at Orientation includes contractors. Question 29: Training provided to 98% of current employees (not just disclosure filers) covered primarily the supplemental ethics regulations, since they were new this year, and provided the names and contact information for the Bureau's ethics officials. Employees also were directed to the Ethics Office's intranet page, which includes information about the principles and standards. During 2013, the Ethics Office plans to cover the principles, standards, and conflict of interest statutes during annual training. Two of the three public financial disclosure filers who did not receive training left federal service before the start of annual training for the year. 29 confidential financial disclosure filers did not receive training because they left the Bureau before the start of annual training. 2 of the 7 current employees who are confidential disclosure filers who failed to attend annual training in 2012, attended the first session in 2013.
Consumer Product Safety Commission		Question 29 - Our new General Counsel arrived well after we did annual ethics training in October, so she did not get "annual" ethics training. However, she was provided a one-on-one ethics orientation. Three career SES officials left the agency in June and September; they

		did not receive the annual ethics training we provided in October.
Corporation for National and Community Service		The two 278 filers who did not attend training were leaving the agency. Two of the 450 filers who did not complete the training were on extended medical leave.
Council on Environmental Quality		All CEQ employees received additional training on Hatch Act, Anti-Lobbying Act, and STOCK Act.
Court Services & Offender Supervision Agency for DC		25. One New Entrant entered the agency after IEO ethics training had finished.
Defense Commissary Agency	N/A	Ethics officers developed a trifold brochure on vendor's ethics and had them distributed to regular vendors.
Defense Contract Audit Agency		#25 - agency requires all new employees to DCAA (to include transfers from other federal agencies) to take initial ethics training. so required "new hire" per OGE is 738 and transfers from other Federal agencies is 145.
Defense Finance and Accounting Service		In addition to annual ethics training provided to filers we also provide ethics training to who do not file but who occupy positions for which ethics training is beneficial, such as supervisors and procurement officials. We have provided the number individuals who fall in this category in the "Training to Others" category in question 29 above.
Defense Intelligence Agency		For this year's training (CY2013), we will be targeting procurement officials, in addition to supervisors and those who are required to complete annual ethics training under the regulations.
Defense Security Service		Question # 29. Two of the agency's OGE-450 filers were unable to complete the annual ethics training in 2012. One of the employees is a military reservist who was deployed overseas in 2012 and who has not yet returned to work at DSS. The other employee was absent from work for most of 2012 due to a serious injury/illness and

		has not yet returned to work at DSS.
Defense Threat Reduction Agency	N/A	25. Number of employees required to received IEO - Includes Civilian "new hires" only.
Department of Commerce		Question 25: Live initial ethics orientation briefings are conducted weekly in Commerce headquarters, bi-weekly at Census and NIST, and monthly at NOAA and USPTO. In 2012, 2559 employees received a live briefing. Question 29 (Others Received):The 3695 "Other" employees who received ethics training either do not file a form of any kind or were not required by regulation to attend a briefing but were provided training anyway.
Department of Defense Office of the Inspector General	Office of General Counsel	Question 27. Human Capital Advisory Services (HCAS) provides the names of new employees to the Training Support Directorate (TSD). TSD plans and organizes the New Employee Orientation (NEO) course which contains a one hour and a half ethics briefing.
Department of Energy		Question 29. Confidential filers (OGE Form 450), difference in number required and received due to filers who were unable to complete ethics training due to extenuating circumstances. One field site requires employees other than 450/278 filers to take training by their discretion.
Department of Health and Human Services		Q25 - All political appointees received live face-to-face IEO training within their first 90 days. 15 employees were still within the 90 days completion timeframe as of December 31, 2012. 33 employees took AET mistakenly and have been instructed to complete the IEO within 30 days. Some that did not take IEO are being sent reminders to complete the required training. Q29 - All personnel that are required to receive AET are notified by email to take it via the online training module via the HHS University Access Management System (AMS). As part of the sign in process the employee was required to identify himself or herself so the automated tracking system documents the completion of the AET. The people in the "Others" category are from some of the HHS divisions that required all of their employees to take the training, as well as other employees who took it on

		<p>their own initiative. All non-career employees received AET. The reason some employees did not take the AET was because the individual employee was unavailable due to such factors as: medical leave; overseas; left the agency; or on military deployment.</p>
Department of Homeland Security	Federal Law Enforcement Training Center	<p>Question #29: 363 employees were required to receive training, only 354 received training. The nine employees who did not receive training consists of 8 retirees and one employee on extended sick leave.</p>
Department of Homeland Security	U.S. Customs and Border Protection	<p>29. Note that the one OGE Form 278 filer who did not receive annual ethics training in 2012 is out on extended sick leave. Also, some employees have not completed the annual OGE 450 ethics training because they are out on maternity leave or other extended leave, or have retired.</p>
Department of Homeland Security	U.S. Coast Guard	<p>Question 25. I have a high level of confidence that all or almost all new employees actually completed their IEO. Documenting IEO completion is a system weakness. Working on a new procedure to document IEO completion.</p>
Department of Homeland Security		<p>Question #25 - DHS had previously reported this number to be 601. When that number was given we failed to add the number for SES personnel who entered on duty during 2012.</p>
Department of Homeland Security	Secret Service	<p>Question 29: One confidential financial disclosure filer retired without receiving training. We trained approximately 550 agency employees who are not required to receive it under the financial disclosure rules as part of our enhanced outreach to field offices and agency-conducted training programs.</p>
Department of Homeland Security	Transportation Security Administration	<p>Q.29 - 11 Public filers terminated employment during 2012. 100% of all 278 filers employed as of December 31, 2012 completed annual training. Q. 29 - The number of 450 filers who were required to receive annual training vs. those who actually completed training incorporates employees who left the agency, left filing positions, were on medical leave, recent new entrants and delinquent</p>

		filers.
Department of Homeland Security	Federal Emergency Management Agency	#25 - Our office is awaiting confirmation of actual number for CY12 from Human Capital. Current number reflects training records available on our Knowledge Center transcripts. #29 - Numbers in Received column reflects training records available for online and in-person trainings. OGE 278 filers received additional refresher trainings throughout the year that is not available via employee transcripts. OGE450 Received column is approximate number. FEMA's legacy database for tracking of training was decommissioned in CY2012.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 25: The breakdown the the number is 468/14(IG) Question 27/28: OIG provides new entrant training via emailed materials (including OGE materials). For the 468 non-IG new entrants, training was instructor led in the classroom by HUD ethics attorneys. Question 29: The breakdown of those numbers are: 7/1(IG); 140/12(IG); 2511/630(IG); 231 non-filers attended the 2012 annual ethics training events as they are also invited to join.
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	The discrepancy between the total number of ATF employees and the number of employees required to take ethics training (as reflected in ATF's Learning Management System (LMS)) in one form or another can be explained by medical and military deferrals (approx. 20), waivers provided to those employees who may have taken an ethics course in special agent basic training (this would comprise several hundred employees). The discrepancy can also be explained by detailees from other agencies as well as paid interns who only served with ATF for several months. New employees are assigned ethics training in LMS, but their status as "new" is not reflected in the system-- they are included with all other employees required to take ethics training. ATF has maintained the practice of providing live ethics training to all employees through 2010. Due to the limited staff working on ethics training at the time, and the use of the primary ethics attorney's time to all procurement matters, only public filers have received live training since 2010.

		ATF will reprise the practice of providing in-person training to a larger population in CY2013.
Department of Justice	Foreign Claims Settlement Commission	Ethics training is provided by DOJ/DEO.
Department of Justice	Civil Division	29. The attorneys who did not complete annual ethics training include 3 on military leave, 3 on maternity leave, 34 have left the Civil Division, and 2 were noncompliant.
Department of Justice	Federal Bureau of Prisons	Q 29: The questionnaire was completed and due before all filers received annual ethics training. All filers required to receive annual training have as of 2/8/13.
Department of Justice	United States Trustee Program	To clarify the response to Part 3, Question 31, there were a total of 12 new employees in the Trustee Program in 2012. The enter-on-duty date for one of the employees was December 31, 2012. That employee was not included in response to Question 31 because the employee had not completed (and was not required to complete) the initial ethics orientation prior to the end of 2012. To clarify the response to part 3, Question 35, four confidential financial disclosure filers did not complete annual ethics training. Three of those employees are on extended medical leave and one of them retired before the deadline to complete the training. The ethics officials have advised that the employees on extended sick leave must view a pre-recorded version of the training upon their return to the office. To clarify the response to part 3, Question 37, some of the training materials were produced by the DEO and other training materials were produced by the United States Trustee Program.
Department of Justice	Environment and Natural Resources	Q. 31: 2 employees left before they were due to attend training.

	Division	
Department of Justice		25. Outstanding training: pending scheduling due to entry-on-duty late in 2012. IEO is hosted once per month by DEO. 26. IEO is held separately from new employees' first-day in-processing to allow for better classroom emphasis on the ethics rules. DEO personally addresses groups of new employees on their first day as part of their in-processing to advise them of their mandatory ethics training requirement within 90 days, and to tell them how to register for IEO. 29. Outstanding annual training is due to medical leave, maternity leave, and departure of financial disclosure filers from DOJ prior to receiving annual training. Outstanding annual training is being scheduled and addressed.
Department of Justice	Executive Office for United States Attorneys	Q 29: Discrepancy in training numbers due to circumstances such as extended maternity or sick leave, out of the country on detail or military leave. For some, filers were going to and have received the training immediately after the first of the year.
Department of Justice	Federal Bureau of Investigation	Q. 29: All employees are required to attend an annual "all division" conference in their respective divisions and ethics training is usually included on the agenda. As such, the vast majority of FBI personnel receive ethics training every year, even those not required to obtain it. For CY12, approximately 10, 916 non-filers received ethics training.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	Q 29: In OJP, there were 2 people out on maternity leave during the time period for training 450 filers. They will be trained in 2013 when they return from maternity leave. In OVW, one 450 filer received their training at the White House where they are on detail.
Department of Justice	Tax Division	This year, the Tax Division gave live ethics training to all filers and support staff.
Department of Justice	United States Marshals Service	Q 29: USMS has been working to get all filers' 2012 annual training complete and will continue until all have received training.

Department of Justice	Drug Enforcement Administration	See additional comments regarding 450 filers-required to receive annual ethics training; and Other DEA employees-required to receive annual ethics training at the end of this survey.
Department of Justice	Criminal Division	32 (cont'd) that request it to deal with particular issues. In addition, the DDAEO provided training on STOCK Act and Hatch Act.
Department of State		<p>Question # 25 - DoS Ethics Attorneys provided additional training to 937 new employees through class room instruction, therefore, the 33 not recorded as having online IEO were probably trained through lecture.</p> <p>Question #29 - DoS Ethics Attorneys provided an additional training 217 DoS employees who attended Ambassadorial Seminars, Deputy Chief of Mission courses in which career employees would be credited with Annual Training. Two Ethics Attorneys went overseas to train at Embassies in London and Paris. Ethics Attorneys also trained Management Officers and Office Management Specialists. One Ethics Attorney developed a Post Employment Briefing that was held as both a seminar and videoconference. He trained 130 departing employees.</p>
Department of the Air Force		<p>Question 25. This is a comprehensive Air Force number, including active duty service members, Air Force Reserve and Air National Guard members, and civilian employees. The number reflected is substantially larger than the number reported last year. Unfortunately, it appears that last year we only accounted for new Civilian employees on our annual report. (new uniformed employees enlisting and assessing into military service were not included but training for all new employees was conducted as part of standard procedures of inprocessing)</p> <p>Question 26. Air Force new employee training is administered at the assignment location. All new HQ employees are briefed at the time of initial orientation in-processing to the agency to ensure all are properly trained. Discretion is left to the field to conduct training as they determine what is best for their circumstances</p>

		and available resources.
Department of the Army		Q25 – Includes new to the Army who received initial ethics orientation, not just new to government. Q29 - Requested and received an extension as to this question due to issues with the training numbers generated by FDM and the need to go out to the field for manual numbers.
Department of the Treasury		Question 29. A note on the training numbers: 1. Many confidential filers departed prior to the announcement of confidential filer annual ethics training in mid-October 2012. 2. We required new entrant filers who arrived early in the year to take annual ethics training that was offered later in the year. 3. The 213 represents Treasury personal services contractors who received annual ethics training. They are not required by regulation to receive ethics training.
Department of the Treasury	Inspector General for Tax Administration	Q #25 - We can confirm that four of the seven employees initially identified as not have completed initial ethics training did ultimately receive ethics training. Information on the remaining three employees has been sought but we have no further information at this time. Going forward, we have migrated our manual system of tracking initial ethics training to an electronic system that will enable us to monitor training and follow up as necessary.
Department of the Treasury	Bureau of the Mint	Q #29 - Corrections to the numbers originally reported. Increase in filers receiving ethics training between 2011 (376 filers) and 2012 (478 filers). After reviewing our data, the 478 number is an administrative error because it included new employees who were non-filers. The correct number of confidential filers required to receive annual training in 2012 was 435—all of which received annual training. 435 includes the number of the Mint’s annual confidential filers in 2012—394, as well as new entrant confidential filers in 2012—41. Each year United States Mint supervisors update their list of employees

		they designate as confidential filers and, depending on supervisory and employee turnover, our list of confidential filers fluctuates from year to year. The number of confidential filers required to receive, and who received, annual ethics training should be 446. (I forgot to add the SGEs in the second time around.) Then, the total number of employees who were required to receive, and received, annual ethics training is 455.
Department of the Treasury	Bureau of Public Debt	29. Filer started on-line training in December of 2012, but did not complete the required amount of time. Filer was abroad on annual leave until mid-January of 2013 when the filer returned to the office and completed the training.
Department of the Treasury	Comptroller of the Currency	Regarding question 29, we provided ethics training to all employees who were on board in late spring 2012. 3912 employees completed the training. For the past three years, we have included our alternative filers in the "other" category in response to the ethics training questions on the OGE questionnaire. This figure, which has been consistently above 2,000 employees, has risen over the past three years."
Department of the Treasury	Financial Management Service	Q #25 - No follow-up with agency regarding this question - reviewer assumes this is due to regular hiring fluctuation.
Department of the Treasury	Financial Crimes Enforcement Network	Question 25: There were five employees who did not receive new employee ethics training in 2012. Two entered duty later in the year and are scheduled to receive in-person training in Feb 2013. The other three did not attend new employee ethics training, but they completed the online annual training that is provided to all non-public financial disclosure filer employees. Question 26: New employee ethics training is not conducted on the employee's first day, but it is typically conducted within 90 days or less of the employee's first day. Question 29: For OGE 450 filers, there is a difference between the number of OGE 450 filers required to receive training and those who received training because three people retired without taking their training and nine people have

		<p>not yet taken their training. Of those nine, three are on extended leave and the other six have been repeatedly notified that they need to complete their training. For the OGE 278 filers, there were two filers that left FinCEN prior to the training being scheduled (both left FinCEN for covered positions in other agencies; therefore, they were not required to file termination reports when they left FinCEN). For the remaining filers, we were not able to conduct our scheduled training before December 31 due to reorganization and transition activities that were occurring during the last month of the year, which is when we normally conduct annual training. Therefore, we have rescheduled the training for each filer, such that they will all have two trainings in 2013: One at the beginning of the year and the other later in the year. To avoid this from happening in the future, we plan to have our annual training before December.</p>
Department of the Treasury	Internal Revenue Service	<p>Two OGE Form 278 filers did not complete the training because they were mistakenly not assigned the training in their online learning plan. That problem has been corrected and we are diligently following up with these two individuals and the other employees to ensure completion.</p>
Department of Veterans Affairs		<p>Question 36: The discrepancy in confidential filer training statistics has been caused by transition to an on-line platform to provide training. We have transitioned all confidential filer disclosure annual training to the VA Learning University Talent Management System (TMS). TMS is an on-line system that is used to provide and track training to VA employees. TMS is familiar to most employees and contains most basic training requirements (e.g., annual IT training, FOIA and Privacy Act, etc). TMS will allow the EST to provide training in a medium familiar to employees. Further, it will allow the EST to track training through reports of compliant/non-compliant filers. TMS sends automated notices and reminders to filers to include supervisors. This transition will allow greater accountability and accuracy in reporting data to VA leadership and OGE. In order to migrate the training to TMS, it was necessary to merge employee electronic training data into a "class" of filers to allow the EST to run reports. This merge is only partially automated and it is necessary to manually credit training that has not properly merged. The 992 confidential filer training discrepancy is being resolved through manual</p>

		review of the non-compliant list. Through this review, the EST will remove duplicate entries, ensure that proper credit has been given for completed training manually and follow-up with any employees that did not complete the training requirement.
Equal Employment Opportunity Commission		Question 29. Regarding the one PAS employee and the eleven 450 employees who did not receive ethics training in 2012, all had left their positions before ethics training was made available.
Export-Import Bank of the United States	N/A	Q 29: 1 employee on extended military duty; 1 employee on detail to another Government Agency.
Farm Credit Administration	N/A	#25 Interns are included in this number.
Federal Communications Commission		29. Because of the press of year end business and travel, we are still in the process of getting our remaining senior employees who did not attend live training to complete their training via a webcast presentation.
Federal Energy Regulatory Commission		29. We had 29 financial disclosure filers retire before the annual ethics training. (25/278s and 4/450s) 32. Although OGE regulations require only 450 and 278 filers to take the mandatory ethics training; the Chairman of FERC mandates that all employees take this training.
Federal Reserve Board	N/A	#32. Which group did you target for additional, specialized ethics training? Check all that apply. Seeking employment training; overview of conflicts of interest for new hires; training with division administrators regarding overview of steps in designating a confidential financial disclosure filer; post-employment; division-specific training.
Federal Retirement Thrift Investment Board		Question 25. 40 out of 41 new employees received IEO in 2012. The one employee who did not receive it in 2012 will be attending the ethics training on 2/4/2013.

General Services Administration	N/A	#25 - Seven (7) new employees were hired in December 2012 and will be trained in 2013. #29 - 1839 were not required to be trained but took annual training. #29 - Administrator was a PAS. She resigned before taking annual training. #29 - 393 OGE Form 450 filers were not trained due to buyouts, regular retirement, termination, removal from filing status or passed away.
Institute of Museum and Library Services	N/A	#29 - Annual ethics training is conducted agency-wide and all IMLS employees are encouraged to attend and participate. One 278 filer left the agency prior to the annual ethics training session. She received all of the required material, however, in her exit interview.
International Trade Commission		We provided New Entrant training to more than required because we also offered it to volunteers. We require all Commission employees to receive annual training, even though many of them are not required to file a financial disclosure report. There is one employee who files an OGE-450, who has not yet completed our training. He has been out of the office during much of 2012 due to a serious illness. We are, however, following up on this.
Merit Systems Protection Board		As of February 1, 2013, all PAS filers, 16 out of 17 Public Filers (non-PAS), and all Confidential Filers completed the annual ethics training for CY 2012. One non-PAS Public Filer did not complete the training and his last day of service was January 29, 2013.
National Aeronautics and Space Administration		Item 26. A few centers handle initial ethics orientation through means other than standard in processing. Item 29. NASA utilizes an OGE approved alternative form in conjunction with peer review. In many instances individuals executing the alternative form would not be required to file or be trained under OGE regulations because the duties requiring conflict screening do not last more than 60 days. Some individuals who may receive training because they file a regular financial disclosure report may also file the alternate form in conjunction with specific peer reviews they participate in so that training due to submitting the alternate form would be duplicative. Notwithstanding the above, OGE expressed its position to NASA in our 2012 program review that peer reviewers are required to be trained as confidential filers. In accord with our comments to OGE's program

		review, NASA is instituting an abbreviated training procedure for peer reviewers.
National Archives and Records Administration		NARA provided Hatch Act training to 3,119 employees in 2012. Some employees received written training to meet the annual training requirement.
National Capital Planning Commission	N/A	Question 29: The National Capital Planning Commission provides annual ethics training to all staff including those not required to file financial disclosure forms. Thus, an additional 13 staff members not accounted for in the above chart also received ethics training during the reporting year.
National Credit Union Administration		36. Others category (127 trainees) are not required to and do not file financial disclosure forms. We encourage all of our employees to attend ethics training and this number represents employees not required to get annual training. 39. We provide a unit on ethics in our agency's training for new supervisors.
National Endowment for the Arts	N/A	In reviewing the records from 2012, Council members (SGEs) received annual training. Public financial disclosure filers received training on the new Form 278 filing process. Program staff received training on conflict free panels. There is no record of 2012 Annual Ethics Training. We will administer 2013 Annual Training as soon as possible in March/April of 2013.
National Endowment for the Humanities		Part 3, Q 29: 8 of NEH's OGE 450 filers, and 8 of NEH's "other" employees (those who do not file a financial disclosure) left the agency before we provided mandatory ethics training to agency staff in 2012. These departures account for the discrepancy in the chart between the number of employees required to receive annual ethics training and the number who actually received it. Part 3, Q 32: NEH ethics officials frequently answer ethics questions from agency staff and SGEs (NEH's advisory

		council members), and take these opportunities to provide targeted, on-the-spot training on specific issues.
National Geospatial-Intelligence Agency (NGA)		NGA personnel numbers are classified and will remain on file in the NGA Ethics Program Office
National Labor Relations Board		Question 32: The total number of employees who received the initial ethics orientation included 28 student volunteers. Question 33: In Headquarters, employees are generally provided the new employee ethics orientation on their first day of employment and, in the field offices, as close thereto as practically possible. Question 34: New employees receive a package of written materials as well. Question 36: Five public filers retired in January 2013, and four did not complete the briefing prior to retiring from federal service. Of the 88 "Other" employees (which includes NLRB purchase cardholders) who were required to receive the annual ethics briefing, one left the NLRB for another federal agency prior to completing the briefing.
National Science Foundation		#29 - supervisors were notified of the non-compliance
National Security Agency		We also provide education via multivision ads that are broadcast to the entire agency, and through periodic newsletters posted to our website and distributed via email.
National Security Staff		Question #25: This number reflects direct NSS employees, but all detailees to the NSS and contractors are required to receive initial ethics training as well. Question #29 (non-PAS filers) includes two individuals who moved from 450 to 278-filer positions during the year. Question #29: We provided annual ethics training to a total of 356 NSS employees, individuals detailed to NSS, and contractors.

National Transportation Safety Board		<p>27. All potential employees are interviewed by the ethics staff prior to the extension of a final offer of employment. A report is prepared as well as an ethics agreement when necessary. As part of the process, a thorough ethics brief is given. That brief is then reinforced by the on-line ethics module each new employee is required to take within 30 days of arrival. 29. We require all employees to take annual training, which is why the "other" number is high. In-person training was limited to the required parties, but we anticipate providing more employees the option of having their annual training in person rather than on line. 32. We normally have targeted training for supervisors as part of a course for new supervisors. The ethics piece of the course was dropped without our knowledge for the 2012 training cycle courses, when the course was shortened. We have since been assured that that ethics training will be re-included for supervisor courses this year and beyond.</p>
Nuclear Regulatory Commission		<p>We also distributed written ethics materials, and delivered agency-wide ethics announcements by e-mail.</p>
Occupational Safety and Health Review Commission		<p>Q #29 - As was discussed in OGE's March 15, 2012 Program Review Report on the Commission's Ethics program, training for our public and confidential filers that usually took place at the Commission's annual judicial conference did not take place in 2011 because the conference was not held that year due to budget constraints. The Commission addressed this training matter with OGE during our Program Review and has implemented new policies and procedures to prevent the delay of ethics training in the future. For example, our annual ethics training plan now contains a contingency plan in the event that the annual judicial conference is not held. In addition to the make-up training, the Review Commission conducted its usual ethics training session during its judicial conference on August 31, 2012 to satisfy the annual ethics training requirements for 2012. Any confidential or public filer who was unable to attend this training session received individual training before December 31, 2012. As such, all twenty-one of our confidential and public filers received the requisite annual ethics training in 2012.</p>

Office of Management and Budget		With respect to question (36.), the outstanding filers who did not attend one of OMB OGC's 10 scheduled training sessions and did not make (and keep) an appointment for small group or one-on-one training before the end of CY 2012 were provided training in early CY 2013 following the conclusion of the fiscal cliff negotiations, which dominated many employees' time throughout the holidays.
Office of National Drug Control Policy		ONDCP provides ethics training to all personnel regardless of whether they are employees, unpaid interns, detailees, agency liaisons, or contractors.
Office of Special Counsel		In 2012, OSC required all staff to attend a training session led by OGE staff. Those unable to attend were required to review the taped session on OSC's intranet by the end of 2012.
Office of the Vice President		<p>25. Initial Ethics Orientation OVP employees are on either the Executive Branch or the Senate payroll. The employees who are on the Senate payroll are subject to Senate ethics rules, but OVP also requires these employees to complete Executive Branch ethics training. Accordingly, the numbers reflected in the response to Question 32 include OVP employees on both the Executive Branch and Senate payrolls who are required by regulation or OVP policy to complete Executive Branch ethics training. In addition to the eighteen OVP employees required to receive initial ethics orientation, two employees who transferred from OVP Senate payroll positions to OVP Executive Branch payroll positions received a second initial ethics orientation although not technically required to do so. One employee joined OVP on December 31, 2012 and is technically not required to complete orientation until 2013 and is not listed in the numbers reported.</p> <p>29. Annual Ethics Training: (Include SGE filers) The Counsel's Office conducted OVP staff-wide ethics training in December 2012. All OVP employees received ethics training for 2012, with the following exception and explanation. One public filer was unable to complete annual ethics training due to an unexpected extended medical leave that remains ongoing. In addition, due to pressing and unforeseen obligations, one public filer and one non-filer completed the 2012 annual ethics training in January 2013. One employee joined OVP in a public filer position on December 31, 2012 and is technically not required to file or complete</p>

		training until 2013 and is not listed in the numbers reported. For this question, only those OVP employees who remained at OVP through the end of calendar year 2012 are considered as having been required to receive annual ethics training. For new entrants, although their initial ethics training also satisfied their annual ethics training requirements, most also attended the group annual ethics training provided.
Overseas Private Investment Corporation		No. 25. Total includes interns. All interns are required to have IEO even though they are unpaid and work only a few months.
Pension Benefit Guaranty Corporation		Question 29 – Confidential filers (OGE Form 450) – One confidential filer could not complete report because they were on medical leave. The second confidential filer was on detail to another agency and filed the form with another agency.
Securities and Exchange Commission		Q #29 - 2659 – Annual & New Entrant/Promotion filers Note: This number does not include the New Entrant/Hires for the Annual training because they are included in the number of employees required to receive Initial Ethics Orientation training in Part 3. Education and training Item 31. Initial Ethics Orientation
Selective Service System		For Q 29, (Confidential filers) 27 were initially required to take training, but two employees left the agency before the training took place. Also, only 9 employees were required to take the training because they must file the 450. The others were required to take the training because the positions they held that could involve ethics related issues.
Social Security Administration		Q29-Two employees unavailable due to illness and military duty.
Tennessee Valley Authority		#32. All TVA employees are required to take annual ethics training. Contractors are strongly encouraged to take but are not required to do so.
Uniformed Services University of the Health Sciences		#29 - one filer deceased during filing period; one filer delinquent

US Postal Service		<p>Question 25 - There was a national hiring freeze in 2011 which resulted in no new employee orientations in the field. Only HQ hired during 2012. The total of 40,498 includes HQ and field employees. Our prior report didn't include the field because there was no training done in the field at that time. Question 29 - There is an error in the submission of 2012 numbers. The correct numbers are: Confidential filers (OGE Form 450) Required 1763, Received 1648. The reason for the difference is: by calendar year end 103 filers had left the agency before annual training was received, 11 employees were excepted out of the training requirement due to being on extended absences from the workplace; 1 employee did not receive the training or did not record his training completion. The public filer information must be updated as well. There were 70 employees required to file a 278 report. 68 received training. Two filers had left the agency after filing but before the training session was presented. Total Required Column should be 1833, Received 1716.</p>
US Trade and Development Agency		<p>Question #29: one employee was on maternity leave when the ethics training was conducted and she is still on maternity leave as of the date of submission of this questionnaire. USTDA will make sure that she completes her annual ethics training as soon as she returns to work from her leave.</p>
White House		

PART 4. ADVICE AND COUNSELING

33) Use the following scale to rate the topics on the frequency with which your agency provided opinions, advice, and counseling.*

	Not at all	Rarely	Periodically	Frequently	Very Frequently	<u>RANK ORDER</u>
Outside employment/activities	()	()	()	()	()	<u>2</u> (445)
Post-employment restrictions	()	()	()	()	()	<u>5</u> (422)
Conflicting financial interests	()	()	()	()	()	<u>3</u> (431)
Awards	()	()	()	()	()	<u>8</u> (263)
Impartiality in performance of official duties	()	()	()	()	()	<u>6</u> (392)
Misuse of position, Government resources and information	()	()	()	()	()	<u>7</u> (359)
Travel, subsistence, and related expenses from non-Federal sources	()	()	()	()	()	<u>4</u> (428)
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	()	()	()	()	()	<u>1</u> (457)

Other topics not listed (please specify)

1: Agency	2: Subcomponent (if applicable)	Other topics not listed (please specify)
Consumer Financial Protection Bureau		Credit restrictions: Periodically
Corporation for National and Community Service		Application of Ethics Pledge

Council of Economic Advisers		
Defense Contract Audit Agency		requests to speak at conferences held by private sector groups
Department of Homeland Security	Federal Emergency Management Agency	Hatch Act and Political Activies Fundraising
Department of Homeland Security	Office of Inspector General	
Department of Homeland Security	Citizen and Immigration Services	Hatch Act, Fundraising
Department of Justice	United States Trustee Program	Political Activities - Hatch Act
Department of Justice		Hatch Act, Ethics Pledge, FGDA, agency gift acceptance
Department of Justice	Drug Enforcement Administration	Teaching, Speaking, Writing; Fundraising
Department of Justice	Criminal Division	
Department of Justice	Antitrust Division	Hatch Act - Periodically

Department of Justice	United States Trustee Program	Political Activities (Hatch Act) - Rarely
Department of Labor		Internal document clearance on ethics issues = very frequently
Department of the Treasury		Hatch Act (periodically)
Environmental Protection Agency		Hatch Act, emoluments clause (for travel)
Equal Employment Opportunity Commission		Hatch Act -- Periodically
Federal Energy Regulatory Commission		Hatch Act, Fundraising and Ex Parte communications
Federal Reserve Board	N/A	Prohibited Holdings - 4 (Frequently)
International Boundary and Water Commission		Hatch Act (even though OSC manages this); teaching speaking and writing , and appearances of conflicts of interest.
International Joint Commission		

International Trade Commission		Advice about how the STOCK Act affects employees' financial reporting. Frequently Vetting a potential nominee to the position of Commissioner. During that process advice was provided very frequently.
National Endowment for the Arts	N/A	Frequently--Questions on Speaking/Writing/Recommendation Letters
National Labor Relations Board		Hatch Act, Stock Act, Speaking Engagements
National Transportation Safety Board		We also address issues arising from service as official participants in committee assignments, and are developing policies for the agency in this area. We also, on a periodic basis, give advice relating to the Hatch Act.
Office of Management and Budget		Hatch Act and Election Conduct
Office of National Drug Control Policy		Seeking employment, STOCK Act compliance, Hatch Act

Surface Transportation Board		Speaking engagements -- periodically
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34) How does your ethics program ensure that accurate, consistent and timely opinions, advice, and counseling are provided to employees? Check all that apply.*

- Review written opinions **105**
- Discuss opinions with staff before providing final decision **106**
- Review ethics officials' phone logs **4**
- Conduct periodic discussions with staff **84**
- Other (specify) **51**

1: Agency	2: Subcomponent (if applicable)	34: Other (specify):How does your ethics program ensure that accurate, consistent and timely opinions, advice, and counseling are provided to employees? Check all that apply.
Access Board		DAEO & ADEAO confer on all ethics matters
Agency for International Development		offer training to staff, maintain GC sharepoint site.
American Battle Monuments Commission		Handle immediately when received
Armed Services Board of Contract Appeals		DAEO and ADAEO talk daily
Chemical Safety and Hazard Investigation Board		Check with OGE Team

Commission for the Preservation of America's Heritage Abroad		Directly
Committee for Purchase from People Who Are Blind or Severely Disabled		As micro agency, there is close coordination by DAEO/ADAEO
Consumer Financial Protection Bureau		Weekly meetings with the DAEO and ADAEO
Defense Information Systems Agency	n/a	review selected written approval
Defense Intelligence Agency		Continuing education.
Department of Agriculture		Ethics advice electronic tracking systems, Ethics issuances and advisories, Office of Ethics website resources
Department of Defense Office of the Inspector General	Office of General Counsel	Maintain electronic and hard copy filing systems of opinions so ethics counselors may compare their opinions to ensure consistency.
Department of Education		weekly meetings with staff attorneys
Department of Energy		video teleconferences quarterly & provide template advice letters & general guidance documents.

Department of Health and Human Services		Review of advice during ethics program review; review of policy and procedures; electronic advice/ethics logs; newsletters on ethics topics; and ethics advice database.
Department of Homeland Security	U.S. Customs and Border Protection	Ethics library with categories of ethics opinions issued.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Review of responses in ethics mailbox
Department of Justice	United States Parole Commission	All advice from DDAEO, in consultation with DOJ Ethics Office where appropriate.
Department of Justice	Foreign Claims Settlement Commission	Advice is usually sought from, or verified with, DOJ/DEO.
Department of Justice	Environment and Natural Resources Division	We consult with DEO on questions that are not routine.
Department of Justice	Executive Office for United States Attorneys	Consultation with ethics advisors through GCO Duty Attorney system
Department of Justice	Office for Justice Programs and Office on Violence Against	OJP's ethics team meets at least weekly to discuss outstanding ethics matters and when an inquiry is sent via email to one team member, it is emailed to the rest of the team for group discussion prior to forwarding a decision.

	Women	
Department of Justice	Drug Enforcement Administration	At least one supervisory ethics official reviews any ethics opinion issued by an ethics counselor.
Department of Justice	Criminal Division	DDAEO is in frequent contact with the DEO to ensure her advice is accurate and consistent with DOJ policy and practice.
Department of Justice	Antitrust Division	One full-time ethics officer handling inquiries
Department of Labor		Review national office files for advice. Also, review and advise on emails from the regional offices
Department of the Interior		Read federal news sources, ethics blogs, daily newspapers & share point (DOI Collaboration Portal)
Department of the Navy		Continuing education requirement for ethics counselors
Department of the Treasury		DAEO approves all written § 208(b)(1) waivers per written office policy.
Department of the Treasury	Comptroller of the Currency	quarterly conference calls with district ethics officials.
Department of the Treasury	Alcohol and Tobacco Tax and Trade	Case Management System

	Bureau	
Department of Transportation		DAEO holds quarterly mtgs with DEO's; AAEO holds monthly mtgs with DOT ethics officials
Department of Veterans Affairs		SharePoint discussion board is used to allow approved final answers to be posted and searchable ensuring consistency and accuracy.
Election Assistance Commission	N/A	Review selected written opinions.
Environmental Protection Agency		monthly conference calls with HQ and regional ethics officials
Federal Deposit Insurance Corporation		Ethics officials responsible for a particular office are copied on all correspondence.
Federal Energy Regulatory Commission		Maintain a database for all inquiries.
Federal Maritime Commission		Consult with OGE team members.
General Services Administration	N/A	Quarterly conference calls and live audits of regional programs once every 3 years.
Institute of Museum and Library Services	N/A	Contact OGE Ethics Team (as needed)
International Boundary and Water Commission		Number and track
International Joint		Discuss with OGE staff

Commission		
International Trade Commission		We contact our OGE contact team frequently and utilize OGE's resources such as Legal Advisories.
Marine Mammal Commission		All guidance provided by DEAO and ADAEO
Millennium Challenge Corporation		Review email for all ethics questions received/answered
National Aeronautics and Space Administration		Regular communication among all of NASA offices.
National Capital Planning Commission	N/A	All ethics matters are handled by the ADEO and the DADEO
National Endowment for the Arts	N/A	We created a special email account solely for ethics - ethics@arts.gov
National Science Foundation		copy each other on correspondence

National Transportation Safety Board		Consult with OGE Team One, as needed
Nuclear Regulatory Commission		Ethics advisors share draft advice where complex/unusual questions are posed. All questions go to special shared email that lets all ethics attorneys see the question and weigh in if they choose.
Nuclear Waste Technical Review Board		periodically submit to GSA OGC for review
Office of Science and Technology Policy		Review OGE memos and/or contact OGE for unusual questions.
Office of Special Counsel		ethics officials confer prior to advice being given
Office of the US Trade Representative		DAEO personally gives or reviews all ethics advice
Overseas Private Investment Corporation		The DAEO and ADAEO consult and collaborate on all ethics matters as necessary.
Pension Benefit Guaranty Corporation		Virtually all ethics advice is documented and then placed in OGC's case management system for easy retrieval and comparison
Presidio Trust		Review log of Ethics binder "Memoranda to the File" documenting history on ethics advice on same or similar topic
Securities and Exchange Commission		SOPs
Selective Service		It is all done by the GC who is also the DAEO

System		
Tennessee Valley Authority		Maintain master electronic file of all advise accessible to those authorized to provide advice.

35) Have you integrated the triage concept into your advice and counsel program[nes5] ?*

() Yes **54**

() No **81**

If yes, which of the following are used for triaging? Check all that apply.

Level of complexity. **25**

Level of employee asking for advice **25**

Waiver (or formal written opinion required) **4**

All of the above **28**

Other (specify) **23**

1: Agency	2: Subcomponent (if applicable)	Other (specify):If yes, which of the following are used for triaging? Check all that apply.
Consumer Product Safety Commission		Time sensitivity of event/issue posed in the question
Defense Commissary Agency	N/A	Concept does not apply to our agency
Department of Agriculture		Time constraints
Department of Commerce		Due date as set by client

Department of Health and Human Services		Urgency of the issue.
Department of Homeland Security	U.S. Coast Guard	timing - how soon is an answer required
Department of Justice	United States Trustee Program	Deadline by which the employee requires an answer
Department of Justice	United States Trustee Program	Deadline by which the employee requires an answer
Department of Labor		Urgency of matter; sensitivity of matter
Department of State		Urgency and the timeliness of response
Department of the Army		Legal deadlines, risk of non-compliance
Department of the Interior		Time sensitivity
Department of the Treasury	Comptroller of the Currency	timing of event requiring a response.
Department of Transportation		Seriousness of the issue
Millennium Challenge		Due to small number of employees we can handle questions as they are received.

Corporation		
National Archives and Records Administration		urgency of the request
National Endowment for the Arts	N/A	Ensuring that office attorneys are cross-trained on basic ethics matters in order to respond quickly and with consistent advice.
National Science Foundation		All of these factors are taken into consideration to ensure that complex, urgent matters are handled in a timely manner.
National Transportation Safety Board		With gifts of travel, also how close we are to travel date.
Office of Government Ethics		Time sensitivity
Office of Navajo and Hopi Indian Relocation		None
Office of the Vice President		We utilize the above in addition to the relevant time constraints.
Securities and Exchange		priority given to urgent enforcement matters

Commission		
Uniformed Services University of the Health Sciences		informally prioritize ethics issues in accordance with a multitude of factors, but provide accurate and timely counsel on every inquiry

Is the triage process written?

- () Yes **5**
- () No **86**

36) Are public filer employees provided a notice of available post-employment counseling when they file a notice of negotiation pursuant to the Stock Act?*

- () Yes **81 (60%)**
- () No **54 (40%)**

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds.
Administrative Conference of the United States	N/A	#36 is not applicable as this situation has not arisen.
Advisory Council on Historic Preservation	N/A	Question 36: We have not faced the described situation for our two public filers while I have been at this agency. There are heads of other federal agencies that are public filers and sit on our agency's board. However, these kinds of ethics issues would be handled by the ethics officers in their respective agencies rather than us.
Alaska Natural Gas Transportation Projects		#36 Continued. . . notice will be provided when applicable.
Appalachian Regional		36. Not applicable. No notices of negotiation filed or anticipated.

Commission		
Armed Services Board of Contract Appeals		36. We have had 0 notices of negotiation filed pursuant to the Stock Act.
Barry M. Goldwater Scholarship & Excellence in Education Foundation		#36 N/A for this 2-person micro agency
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Chemical Safety and Hazard Investigation Board		36 - Micro agency - issue has not occurred
Commission for the Preservation of America's Heritage Abroad		The 21 are uncompensated SGEs. Only one, the Chairman, spends more than a little time on the work of the Commission.
Commission of Fine Arts		for #36 - not applicable --no notices of negotiation filed.
Commission on Civil Rights	n/a	#36 The ADAEO provided in person post-employment counseling to public filers after the person filed a notice of negotiation pursuant to the Stock Act.
Consumer Financial Protection Bureau		Question 36: Public filer employees are informally provided a notice that post-employment counseling is available.
Corporation for National and Community Service		All employees are required to seek post employment counseling as a part of the off-boarding process.
Defense Contract Audit Agency		36. No public filer has provided notice, but would receive the notice of post-employment counseling if that occurred.
Denali Commission		#36 has not occurred

Department of Agriculture		#36) Notice provided via email, telephone, or in-person.
Department of Defense Office of the Inspector General	Office of General Counsel	Question 35. Special thanks to our OGE desk officer for providing an explanation of the colloquialism “triage concept.” Prioritizing requests for ethics advice is an important element of our ethics program. Question 36. Public filer’s receive annual post employment counseling through the FDM electronic filing system. They certify acknowledgement of the counseling through FDM. Again, special thanks to our Desk Officer for explaining the basis of this question.
Department of Energy		Question 36. We don't automatically provide written guidance but it is our practice to contact employees when we receive recusals in any circumstance.
Department of Homeland Security	U.S. Customs and Border Protection	35. All ethics advice requests are managed by the head supervisory attorney as a workflow management issue, but this is not formalized as a "triage" process.
Department of Homeland Security	Transportation Security Administration	Q. 35. Although we do not have a formally written triage process, we assess incoming ethics issues and consider factors such as impact upon the agency mission; national significance; criminal conflict of interest implications; and time requirements.
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	Questions 34-35: DOJ is unclear as to the precise meaning of "triage concept," for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Federal Bureau of Prisons	Q. 34-35: DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Civil Rights Division	Q 34-35: DOJ is unclear as to the precise meaning of "triage concept," for advice and counsel. Ethics

		officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	United States Trustee Program	When the ethics officials receive notice that a public financial disclosure filer is seeking, negotiating or accepting non-government employment, they provide a package containing guidance on the seeking employment ethics laws. If a public financial disclosure filer has not received the seeking employment/post employment package prior to filing the notice of negotiation, the package will be provided to him or her when the notice of negotiation is received. The package includes contact information for the employee to use if he or she has questions or seeks further guidance.
Department of Justice	Environment and Natural Resources Division	Q 34-35: DOJ is unclear as to the precise meaning of "triage concept," for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice		35. The precise meaning of triage is unclear. DOJ ethics officials incorporate the factors listed, among others, in advising and counseling employees. 36. Requirements and availability as to post-employment counseling are made available to all departing employees including public filers. When Stock Act notice is received, post-employment counseling is provided and confirmed.
Department of Justice	Executive Office for United States Attorneys	Q 34-35: DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Federal Bureau of Investigation	Q. 35- DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	Q35- DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.

Department of Justice	Tax Division	Q 35: DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Office of the Pardon Attorney	Q 35: DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	United States Marshals Service	Q 35: DOJ is unclear as to the precise meaning of "triage concept" for advice and counsel. Ethics officials incorporate several factors including those listed in their approach to requests for advice and counseling.
Department of Justice	Criminal Division	When a public filer files a notice of negotiation pursuant to the STOCK Act, if the DDAEO has not already discussed post-employment with the filer, she contacts the filer to provide post-employment counseling.
Department of Justice	Antitrust Division	The precise definition of triage concept is unclear. Informally used, it includes all factors listed as well as time sensitivity or significance of matter.
Department of Justice	United States Trustee Program	When the ethics officials receive notice that a public financial disclosure filer is seeking, negotiating or accepting non-government employment, they provide a package containing guidance on the seeking employment and post-employment ethics laws. If a public financial disclosure filer has not received the seeking employment/post-employment package prior to filing the notice of negotiation, the package will be provided to him or her when the notice of negotiation is received. The package includes contact information for the employee to use if he or she has questions or seeks further guidance.
Department of the Air Force		Question 36. Public filers are provided notice of available post-employment counseling when they file a notice of negotiation as part of a more broad agency-wide effort to make post-employment counseling available.
Department of the Army		Q.36 – All employees are offered PGE briefing if they indicate they are seeking NFE employment.

Department of the Treasury		Question 36—Filers are made aware of post-employment briefings at their initial ethics orientation and through periodic ethics email and newsletter reminders. When a public filer announces his departure or we receive a system generated notification that a public filer is departing, we schedule a post-employment briefing and send written summary materials via email along with notice to file a termination report.
Department of the Treasury	Bureau of Public Debt	35. Given the Bureau's small size, the number of ethics questions we receive are usually spread out overtime and easily managed by the ethics officials. 36. As of the time of this Questionnaire, no one has filed a notice of negotiation pursuant to the Stock Act.
Department of the Treasury	Comptroller of the Currency	Regarding question 36, public filers have typically obtained ethics counseling prior to engaging in negotiations.
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	#36 - No notice is provided but a discussion is held with the filer of the Stock Act notice of negotiation.
Department of the Treasury	Bureau of Engraving and Printing	Question 36: Our bureau has very few public filer employees and did not receive any notices of negotiation during calendar year 2012.
Equal Employment Opportunity Commission		Regarding question 36, the answer is "not applicable at this time" because EEOC has not received any notices that employees are in negotiations regarding future employment possibilities.
Federal Election Commission		Public filer employees were not provided a notice of available post-employment counseling because no one filed a notice of negotiation pursuant to the Stock Act during the reporting period. All outgoing employees must complete an ethics exit interview with the Deputy Ethics Official. At that time, they are counseled on any applicable post-employment

		restrictions and encouraged to contact the Deputy Ethics Official if they have further questions.
Federal Mediation and Conciliation Service		The issue in question 36 has not arisen.
Federal Retirement Thrift Investment Board		Question 36. We will provide this to our employees, however; we have not had anyone file a notice of negotiation yet.
Institute of Museum and Library Services	N/A	#35 - As a small agency, we endeavor to provide accurate and timely advice to all staff members when needed. Unless the issue is truly time-sensitive, the level of complexity or grade level of an employee rarely determines when ethics advice or counsel is provided.
Inter-American Foundation		all employees go through an exit ethics interview when they leave the agency.
National Aeronautics and Space Administration		Item 32. This list includes professional areas targeted at NASA centers. Item 36. All NASA public filers are offered post employment counseling prior to departure as part of the regular check out procedure.
National Archives and Records Administration		With regard to question 43, we have had only one employee file a notice of negotiation. That employee had already received the post-employment guidance we offer via email. When we learn of a filer preparing to leave either NARA or retire, we provide post-employment guidance.
National Capital Planning Commission	N/A	36. No Stock Act issues have been encountered by the ADEO or the DADEO
National Credit Union Administration		43. We have had very limited notice of negotiation filings but have made our staff aware of post-employment requirements.
National Endowment for the Humanities		Part 4, Q 36: None of NEH's public filers have yet filed a notice of negotiation pursuant to the STOCK Act, but were any of them to do so, we would provide them with post-employment counseling, as we do for departing employees as well.

National Labor Relations Board		Question 43: The only notices received in the past year regarding Section 17 of the Stock Act were from departing PAS employees and those employees receive a memo regarding seeking employment and post-employment counseling 6 months, 3 months, and one month prior to the expiration of their terms. A package of post-employment materials is sent to all public filers 30 days prior to their leaving the federal government and they are provided notice in that package that post-employment counseling is available.
National Science Foundation		#36 - Post-employment counseling widely advertised to all GS-12 equivalent employees and above
National Transportation Safety Board		35. Would appreciate learning more to see if I understood the question. If triage in this circumstance means how do we prioritize our work, I have answered the question correctly. 36. Our practice will develop as these notices become more common. Presently, we offer targeted training periodically to PAS employees; provide advice to past and present employees at any time it is requested, with or without the filing of a notice of negotiation; and provide all public filers the opportunity to have an in-person out-brief, and, in any event, a letter noting resources available for post-employment questions, and ethics official contact information, which also serves as the notice regarding the requirement to file their termination 278.
Office of Government Ethics		RE: Q36. OGE, being a microagency with only 5 public filers, has not had a public filer indicate he/she is negotiating for employment since the passage of the STOCK Act.
Office of Management and Budget		With respect to Q.43, more precisely, public filer employees who file a Sec. 17 notice of negotiation under the Stock Act are, in virtually every case that can be recall, provided with actual post-employment counseling, as it is virtually always requested by the filer, typically on multiple occasions.
Office of National Drug Control Policy		No notices of negotiation pursuant to the STOCK Act have yet been filed at ONDCP.
Office of Special Counsel		36. No public filers filed a notice of negotiation in 2012, but we are aware that they must do so should

		they file.
Peace Corps	NA	There were no post employment issues which needed to be addressed once the employee filed the notice of negotiation pursuant to the Stock Act.
Presidio Trust		Regarding question 36, this issue has not arisen but we would issue such a notice. We welcome an OGE template in that regard.
Railroad Retirement Board		Note #36 we have not had any public filers file a notice of negotiation pursuant to the Stock Act.
Recovery Accountability and Transparency Board	n/a	All our 278 filers are on detail from other Federal Agencies whose Ethic Office are responsible for them. We do however provide advice to those filers when asked or when appropriate.
Selective Service System		For Q 36, we haven't had a public filer file a notice of negotiation.
Surface Transportation Board		The Board has not integrated the triage concept, but has had no situations in which triage was necessary in the last year. We have had very few, if any, ethics violations over the last few years. Employees, including our PAS employees, know to come to the Deputy Ethic Official or our DAEO, who is consistently in contact with the other higher-level employees and PAS employees. Additionally, we have informed public filers of the new "pre-post-employment" rules, and they know that we stand available to help them through that process consistent with ethics rules and laws.
US Postal Service		Question 36 - All public filers are known to DAEO and when termination dates are known, DAEO reaches out to see if Post-Employment Counseling is warranted.
US Trade and Development Agency		Question #36: when public filers file a notice of negotiation pursuant to the Stock Act, they are advised that the agency ethics officer is available to provide post-employment counseling at any time.
White House		Please note that the White House does not have any PAS officials on staff. However, we provide all White House staff with both oral and written post-employment guidance. We provide guidance to staff on an as needed basis as they depart the White House and all staff are required to complete a post-employment briefing before they are permitted by Personnel to separate from the White House.

PART 5. ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL AND CIVIL STATUTES

37) Number of disciplinary actions taken based wholly or in part upon violations of the standards of conduct provisions (5 CFR part 2635) in 2012. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents.* 2673

38) Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209 in 2012. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents.* 40

39) Number of referrals the ethics office made to the Office of Inspector General of potential violations of the criminal conflict of interest statutes in 2012* 121

40) Do you track referrals made to the Department of Justice that result in disciplinary actions or criminal prosecutions?*

() Yes 72

() No 62

41) Which office(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.*

[] DAEO/ADAE0 93

[] General Counsel 61

[] Agency Head 18

[] IG 44

[] Other (specify) 4

1: Agency	2: Subcomponent (if applicable)	41: Other (specify): Which office(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.
Commission on Civil Rights	n/a	Staff Director
Department of Health and Human Services		IG coordinates with the OGC Ethics Division when filing Form 202.
Department of Homeland Security	Secret Service	Office of Professional Responsibility
Department of Homeland Security	Transportation Security Administration	The TSA Office of Inspection works with the DHS IG
Department of Homeland Security	Immigration and Customs Enforcement	If ICEOPR makes the referral to DoJ, it would notify OGE, but DHS IG often does both.

Department of Homeland Security	Federal Emergency Management Agency	DHS HQs General Counsel Office notifies OGE
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Civil Division	OPR
Department of Justice	Federal Bureau of Prisons	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Civil Rights Division	DDAEOs may refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Environment and Natural Resources Division	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice		DDAEOs refer matter to DEO, who in turn, notifies OGE. Some components may also notify OGE, such as the FBI.
Department of Justice	Executive Office for United States Attorneys	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Federal Bureau of Investigation	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	DDAEOs refer matters to DEO, who, in turn, notifies OGE. FBI may also notify OGE.

Department of Justice	Tax Division	DDAEOs refer matters to DEO, who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Office of the Pardon Attorney	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	United States Marshals Service	DDAEOs refer matters to DEO who, in turn, notifies OGE. FBI may also notify OGE.
Department of Justice	Drug Enforcement Administration	The DEA Office of Professional Responsibility is responsible for coordinating all conflict of interest referrals with the Department's Office of the Inspector General.
Department of Justice	Criminal Division	DEO would notify OGE
Department of Justice	Antitrust Division	DEO
Department of the Navy		Naval Criminal Investigative Service
James Madison Memorial Fellowship Foundation		our servicing agency - NBC

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds.
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Advisory Council on Historic Preservation	N/A	Question 40: We have not made any such referrals while I have been here.
Agency for International Development		In addition to the 13 disciplinary actions mentioned in question # 37, 5 employees chose to resign or retire prior to the implementation of proposed disciplinary action.
Alaska Natural Gas Transportation Projects		#40 Continued. . . . referrals to the Department of Justice will be tracked when applicable.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Defense Finance and Accounting Service		Question 40 is not applicable since we had no referred incidents. If we had such an incident, we would track it.
Department of Agriculture		#40) Tracking primarily through OIG.
Department of Homeland Security		The information asked about in questions 37, 38 and 39 is not tracked by the Ethics Office. We have been unable to get this information.
Department of Homeland Security	Immigration and Customs Enforcement	37. and 38. The ICE Ethics Office plays no role in employee discipline. An inquiry with the Office of Human Capital in ICE did not result in information needed to answer this question. Human Capital informs that they do not track discipline in a way that would permit these

		questions to be answered accurately. 40. This office tracks referrals to the DoJ if we are notified that a referral is made. The IG has no responsibility to inform this office if such a referral happens.
Department of Homeland Security	Office of Inspector General	39. We are only responding for the OIG - the OIG Ethics office did not make any referrals to the OIG Office of Investigations.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 37/38: 8 cases were referred to DOJ by OIG (AUSA are handling 6, County/DA are handling 2).
Department of Justice	United States Trustee Program	To clarify Part 5, Question 50, the United States Trustee Program has not had any referrals during the applicable reporting period but would track any such referrals for confirmation of the result.
Department of Justice		37 - 39. Six individuals are the subject of proposed disciplinary actions. These actions have not been finalized. In some instances, individuals left DOJ before disciplinary action was imposed.
Department of Justice	Criminal Division	I have advised supervisors that they need to take disciplinary action in certain instances where someone has violated the Standards of Conduct and if not, I would need to make a referral to the IG. I have followed up and been told that there was disciplinary action. I have no independent knowledge other than the supervisor telling me that this was done.
Department of Justice	United States Trustee Program	To clarify Part 5 Question 50, the United States Trustee Program has not had any referrals during the applicable reporting period but would track any such referrals for confirmation of the result.
Department of the Treasury		Question 39. The employee left Treasury of his own accord prior to any decision regarding disciplinary action. (There was no determination of disciplinary action at the time of the employee's

		departure.)
Department of the Treasury	Financial Crimes Enforcement Network	Question 40: We have not made any referrals to the Department of Justice. However, if we do in the future, we will track such matters.
Department of the Treasury	Internal Revenue Service	For question # 41, the IG for the IRS is the Treasury Inspector General for Tax Administration.
Equal Employment Opportunity Commission		The answer to question 40 is "not applicable" as EEOC did not make any referrals to DOJ.
Farm Credit System Insurance Corp.	N/a	#39 FCSIC has o IG.
Federal Communications Commission		40. OIG tracks referrals to DOJ.
Federal Election Commission		The DAEO and the Inspector General have a long standing Memorandum of Understanding that assigns responsibility for referrals to the IG and notifications to OGE of referrals to the DAEO.
Inter-American Foundation		re question 40- if we had an action that resulted in disciplinary action or criminal prosecutions the referral to DOJ would be tracked.
International Trade Commission		The disciplinary actions taken with regard to question 37 were 2 removals and 1 suspension.
Merit Systems Protection Board		Number 40: This question is not applicable, as we did not make any referrals to the Department of Justice.
National Capital Planning Commission	N/A	40. No referrals were made during the reporting period.
National Credit Union		40. We have had not referrals in recent years. 41. Our DAEO is the General Counsel.

Administration		
National Endowment for the Arts	N/A	Question 40 - We do not have any disciplinary actions or criminal prosecutions to track as referrals to DOJ. Question 41 - The same person serves as DAEO and General Counsel. Both functions reside in the same office.
National Endowment for the Humanities		Part 5, Q 40: This question is not applicable, as NEH did not make any referrals to DOJ during 2012. Part 5, Q 41: At NEH the DAEO is the General Counsel.
National Science Foundation		#40 - This office does not track referrals but our IG's office does.
National Transportation Safety Board		40. We would track referrals, but are not aware that the agency has made any such referrals, at least for many years. 41. DAEO or General Counsel would typically be the notifying source; others would make referrals only in unusual circumstances.
Occupational Safety and Health Review Commission		We do not have an IG.
Office of Administration		#39. The Office of Administration does not have an Office of Inspector General.
Office of Management and Budget		With respect to Q.48, any referral is performed by the Agency Head, but in close consultation with the General Counsel and DAEO, who reports to the GC. In the single instance of a referral since the beginning of 2010, the White House Counsel's Office was also consulted.
Office of Special Counsel		40 and 41. No referrals were made in 2012, therefore nothing was filed or tracked, although we would do so if it were necessary.
Overseas Private Investment Corporation		No. 40 We have not had any, so we have not had to track any.

Securities and Exchange Commission		we do not track data in question 37 - I tried to write that in but the survey wouldn't accept it so I had to put 0
Selective Service System		For Q40 we haven't made any referrals to DOJ but would track them if we did.
US Postal Service		Question 40 - Done by the Office of Inspector General Counsel.
US Trade and Development Agency		Question #40: USTDA does not track referrals made to DOJ that result in disciplinary actions or criminal prosecutions because our agency haven't had any such referrals.

PART 6. PUBLIC FINANCIAL DISCLOSURE

42) OGE 278 Reports

Nominee/New Entrant*

	PAS ⁴	Non-Career SES ⁵	Career SES ⁵	Schedule C	Other ⁶	TOTAL
Required	80	175	1,064	298	1,217	2,834
Filed	80	172	1048	293	1207	2,800 (99%)
Posted to OMB MAX	8	52	345	141	422	968

Annual*

	PAS ⁴	Non-Career SES ⁵	Career SES ⁵	Schedule C	Other ⁶	TOTAL
Required	756	1,084	9,927	1,165	7,924	20,856
Filed	756	1,095	9,900	1,158	7,846	20,755(99.5%)
Posted to OMB MAX	95	296	3442	660	3,484	7,977

Termination*

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶	TOTAL
Required	70	143	801	193	2,496	3,883
Filed	4	138	748	187	2,476	3,553 (91%)
Posted to OMB MAX	5	47	201	106	2,156	2,515

Combination^{3*}

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶	TOTAL
Required	26	26	221	36	195	504
Filed	26	26	218	36	190	501 (99%)
Posted To OMB MAX	2	13	55	16	94	180

Total*

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶	TOTAL
Required	932	1,428	12,013	1,692	11,832	27,897
Filed	926	1,431	11,914	1,674	11,719	27,709 (99%)
Posted to OMB MAX	110	408	4043	923	6,156	11,640

³ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

⁴ Presidential appointees confirmed by the Senate.

⁵ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁶ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc

43) Does your agency have written procedures for following up with delinquent public financial disclosure (OGE Form 278) filers?*

() Yes **93**

() No **42**

44) Does your agency require an intermediate review by someone other than an ethics official for public financial disclosure (OGE Form 278) reports?*

() Yes **28**

() No **107**

45) Annual and termination reports:*

	Granted filing extension	Granted waivers of late filing fee	Paid late filing fee
Number of OGE 278 filers	<u>3,878</u>	<u>205</u>	<u>63</u>

46) Transaction reports:*

	With filing extension	With waivers of late filing fee
Number of OGE Form 278 T Reports	<u>293</u>	<u>28</u>

47) Number of OGE Form 278 T Filers who paid late filing fees:* 0

48) Number of public financial disclosure filers reported to the Attorney General for willful nonfiling:* 0

49) Number of public financial disclosure (OGE Form 278) filers who took specific corrective or remedial actions because of information on the annual report (e.g., divestiture, resignation from outside position, written disqualification, U.S.C. § 208 waiver, reassignment, etc.) in 2012:* 229

50) Corrective actions taken OGE Form 278 annual reports*

	Recusals	Divestitures	Waivers	Resignations from outside positions	Reassignments	Don't know/don't track
						Yes*
Number of corrective actions taken OGE Form 278 annual reports:	<u>344</u>	<u>47</u>	<u>6</u>	<u>12</u>	<u>0</u>	<u>[26]</u>

51) Number of public financial disclosure (OGE Form 278) filers who took specific corrective or remedial actions because of information on transaction reports (e.g., divestiture, resignation from outside position, written disqualification, U.S.C. § 208 waiver, reassignment, etc.) in 2012: * 10

52) Corrective actions taken on OGE Form 278-T transaction reports.*

	Recusals	Divestitures	Waivers	Reassignments	Don't know/don't track
					Yes*
Number of corrective actions taken on OGE Form 278-T transaction reports:	<u>5</u>	<u>7</u>	<u>0</u>	<u>0</u>	<u>[24]</u>

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds.

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds.
Advisory Council on Historic Preservation	N/A	Part 6 (overall): There are several heads of other federal agencies (and their designees) who serve on our board and file OGE Form 278 at their respective agencies. The ethics officials at their respective agencies handle the collection and review of their OGE Form 278s. We get a copy of their filings on or before August 1, but we do not track the issues that are the topic of most questions in this Part. We have therefore not included their numbers in our

		answers to this Part.
Agency for International Development		#44 - We do not require an intermediate review on our OGE-278's, however we do strongly urge an intermediate review at the mission level. #49-52 - 21 of our public filers filed recusals in 2012. We did not track whether the initial cause of the recusal was the OGE-278, OGE-278T, ethics training, a question from the filer, etc. Anecdotally, most people self-identify the need for recusals based upon their personal knowledge of the rules derived from ethics training.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Consumer Financial Protection Bureau		Question 42: The Ethics Office did not load two termination and three annual 278s to OMBMax due to the delay in the posting deadline. Question 49 and 51: The Ethics Office does not track this information.
Consumer Product Safety Commission		Question 49 and 50 - Commissioner Anne Northup (left the agency in October 2012) divested of certain stocks in 2012 as a result of our ethics officials taking an in-depth look at her form. Previously, we inadvertently allowed her to maintain these assets. We informed her of the requirement to divest in February 2012. By August 2012, she completed all required divestitures.
Corporation for National and Community Service		One new entrant report is still under review. One annual report is still under review because the filer has had difficulty obtaining financial records due to domestic legal issues. One termination filer with few assets and no decision making authority (Schedule C type, employee) has not filed a termination report.

Court Services & Offender Supervision Agency for DC		42. The head of the gency (a PAS position) and the DAEO's OGE 278 reports, respectively, were filed but not posted on OMB Max.gov. Both reports were forward to OGE for redaction, if applicable, and posting.
Defense Finance and Accounting Service		With regard to question 42, DFAS has not uploaded any of the reports to OMB Max due to the ongoing uncertainty and litigation regarding the online posting of public financial disclosure reports. We do, however, have all the reports prepared and ready for batch-upload so that we will be ready when the uncertainty is resolved.
Defense Information Systems Agency	n/a	Number 42 Annual and Termination Filers who are military posted their forms on OMB Max with their military components.
Defense Intelligence Agency		We had a total of seventeen (17) OGE Form 278-T transaction reports in CY 2012.
Defense Logistics Agency		*** Reports of military Flag and General Officers will be posted to OMB Max by their respective Military Services. This guidance was issued by DoD SOCO.
Department of Agriculture		#(49) & #(51): Not tracked.
Department of Commerce		Question 42: Required reports include ones that were not due until 2013.
Department of Defense		Discrepancy in the number of 278 reports require and the number filed is the result of combat zone filing extensions.
Department of Energy		Question 52. Corrective actions taken on OGE Form 278-T transaction reports. No answer because no actions were taken.

Department of Health and Human Services		Q42 - Four of the 56 New Entrant and one of the 35 Termination (“Other” category) filers who were required to file are within the 30 days time in which they could file their report.
Department of Homeland Security	Transportation Security Administration	Q. 42: Public Financial Disclosure forms have been scanned and uploaded to OMB MAX and are ready for publication. We did not post due to the extension of the posting deadline to April 15, 2013. Q. 51: Although we do not track corrective actions by number and type, we are aware of one filer who has executed a recusal and one who has divested an asset because of information on the annual report. Q. 52: Although we do not track corrective actions by number and type, and due to the limited amount of 278Ts received during 2012, we can respond that 0 corrective actions have been taken as a result of information on 278T reports.
Department of Homeland Security	Office of Inspector General	Q.42 - Three employees "acting" in SES positions should have filed in 2012, but we did not alert them timely to this requirement. Once alerted, two filed timely (one was granted an extension), while the third employee has not yet filed, but has an active extension.
Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 49: Corrective actions by 278 filers are typically taken upon filing a new entrant report and are resolved before an annual report would be filed.
Department of State		Currently we do not have a ready mechanism to track items #50 and 51
Department of the Air Force		Question 42. The numbers indicated do not reflect the Air Force employees in joint assignments during 2012. According to the standard protocol for joint assignments, Air Force employees file their financial disclosure report through the chain of command for the joint assignment (generally, this means through the Department of Defense). Question 50. As this is a new requirement,

		most offices did not track this data for 2012. Question 52. As this is a new requirement for the report under the newly implemented STOCK Act, most offices did not track this data for 2012.
Department of the Army		Q 49&50 - Numbers represent responses from those offices that track. Note that some individuals took multiple actions so there are more corrective actions than filers who took corrective action.
Department of the Treasury		Question 42. Reports are on Max.gov but not officially posted/published. We were advised by OGE that we did not need to include this number. Question 49. Don't track
Department of the Treasury	Inspector General for Tax Administration	Q #42 - The increase in 278 filers reflected in this year's report is due to TIGTA had several employees act in covered positions for more than 60 days as well as some staff turnover.
Department of the Treasury	Bureau of Public Debt	Q #42 - When you compared Public Debt's 2011 questionnaire to our 2012 questionnaire there was an increase in the number of 278 filers, mostly do to a miscalculation on my part. Nominee/New Entrant Filers - as discussed, there were five new filers. 1 new filer was an SES candidate on a rotation from another agency, who subsequently left in late January of 2013; 1 new filer was hired to be in charge of a new business line of the Bureau; 1 new filer resulted from a deputy assistant commissioner position being converted to an SES position; 1 new filer position resulted when an assistant commissioner was promoted to a newly created third deputy commissioner position and her previous position was backfilled; and the other new filer resulted when an opening was created because a SES retired. With regard to one of the new entrants, the gentleman was not aware of this duty to file until January 2013. When I gathered information to complete the Questionnaire, I realized that there should have been one more 278 filer. I inquired if the position was open or if someone was acting in it. I was informed that a gentleman was acting in the position and had been for more than 60 days. I requested that he immediately file a 278 new entrant report, he immediately complied. His SES application was approved by OMB and he is now officially a deputy assistant commissioner. Per our conversation, you said I should had listed him as required

		<p>to file and filed. Annual Filers - There were 15 annual filers. Three annual filers retired in the Fall of 2012, so they all filed annual reports and termination reports. Also, in the past we never included the Chief Counsel's report, because he filed it with the Treasury Department's ethics office. The Treasury Department said we could include him in our numbers this year. Termination Filers - As previously stated, we had three termination filings (a commissioner, two assistant commissioners). Combination Filers - We had no combination filers.</p>
Department of the Treasury	Alcohol and Tobacco Tax and Trade Bureau	<p>Q #42 - The increase in 278 filers between 2011 and 2012 is due to two SES retiring and two hired to replace retired filers. Note: One SES was acting in the position for more than 60 days.</p>
Department of the Treasury	Financial Crimes Enforcement Network	<p>Question 42: Of the eleven OGE 278s listed above, FinCEN will only be responsible for posting and publishing nine in the MAX system. Two of those reports will be posted and published by the Treasury Department.</p>
Department of the Treasury	Internal Revenue Service	<p>Q #42 - We indicated that 390 reports were required to be filed in 2012 and 388 had been filed. The two outstanding reports were both termination reports for filers that had received extensions and were still within their due dates at the time we filed the Questionnaire. We have since received both reports.</p>
Department of Veterans Affairs		<p>Question 42: Because the appropriate HR office failed to notify OGC of their departure, a total of 13 public filers left the agency without filing a termination report. The HR office is currently locating post-employment contact information for these filers and we are contacting the filers regarding this requirement. If any filer willfully fails to comply, we will act in accordance with 5 CFR 2634.701. OGE previously advised that we add "OGC" as a "Stop" on VA Central Office clearance forms. We have done so and this procedure has proven helpful, as during the first week of January 2013 two public filers were notified of their termination requirement only after stopping at OGC during their clearance from the agency. We are also working closely with the appropriate HR office in an effort to improve their ability to accurately report departing public filers.</p>

Environmental Protection Agency		46. We don't think we were asked how many transaction reports overall we received, but if you're curious, it was 102. 50. We routinely issue cautionary notes to all filers whose reports indicate assets or outside positions that may raise concerns. Those notes are maintained in each person's individual file. We do not keep track of the overall number of recusals, etc.
Equal Employment Opportunity Commission		Regarding question # 42, EEOC has not posted to OMB MAX the 278 reports of our PAS employees because these reports are posted by OGE.
Federal Housing Finance Agency		Re: Question #49, 257 reports have been uploaded to the OMB MAX, but have not yet been published. Of these reports, 206 are annuals, 36 are new entrants, 14 are terminations and 1 is a transaction report.
Federal Mediation and Conciliation Service		Re: questions 49-52. Mediator recusals and reassignments are made on a day-to-day routine basis by individual mediators in collaboration with their Director of Mediation Services (immediate supervisor) and do not come to the attention of ethics officials except in unusual or difficult cases.
Federal Mine Safety & Health Review Commission		For No. 42: Our agency did not post PAS reports on OMB MAX. It is our understanding that OGE posts such reports.
General Services Administration	N/A	#42 - Although GSA has not posted any OGE Form 278s or OGE Form 278-Ts to OMB MAX, all OGE Form 278s and OGE Form 278-Ts received in 2012 have been reviewed, certified, redacted, scanned, and saved to an internal GSA shared drive using the OMB MAX naming convention. #45 - The OGE Form 278 filer who was granted a waiver of the late filing fee was granted the waiver due to an administrative oversight in notifying the filer of the OGE Form 278 filing requirement. #50 - Fifty three (53) cautionary memos were given to OGE Form 278 filers in 2012

<p>International Trade Commission</p>		<p>Question # 42: One of our Sch C filers was extremely sick throughout 2012 and had to retire in 2012. She then passed away in 2012. We did not collect either an annual report or a termination report from her. Question # 42. One of our SES filers retired on December 30, 2012. We have received her termination report within the 30 day period but it has not yet been posted to max.gov. Question # 50: We are aware of recusals by the Commissioners and a few Schedule C who have sought advice. We do not know whether others have just avoided being assigned to matters that would raise a conflict because of their financial holdings. There was an unusual number of recusals reported by one of our Commissioners in 2012 due to the fact that she was about to leave the Commission and was engaged in job seeking with private law firms. Questions 50 & 52. We have recusals and divestitures as a result of holdings that are listed on the annual and transaction reports. We don't track these "corrective actions" as related to either an annual or transaction report.</p>
<p>National Aeronautics and Space Administration</p>		<p>Item 42. In accordance with Federal legislation delaying implementation of the STOCK Act's online posting requirements. NASA has not authorized online release of any public financial disclosure reports uploaded to the OMB MAX system. Item 45. The late filing fee's indicated are for forms prior to the 2012 cycle that were paid during 2012. The fee waiver indicated is for a form prior to the 2012 cycle. Item 46. All NASA public filers were also granted an extension to file periodic reports pending the completion of NASA's electronic platform for filing periodic reports, which became available in October 2012. Items 50 & 52. NASA did not have a vehicle to track specific corrective or remedial actions described in these items on an agency-wide level for the 2012 filing cycle.</p>

National Endowment for the Arts	N/A	With regard to Question 46: Filers did not receive reminders to file monthly 278-Ts from October - December 2012, nevertheless some filers responded timely each month. Beginning in 2013 we will issue monthly reminders.
National Geospatial-Intelligence Agency (NGA)		All NGA personnel numbers are classified and will remain on file at the NGA Ethics Program Office
National Labor Relations Board		Question 49: Three recess appointees were nominated for their positions and filed nominee reports in connection with their nominations. Question 49: All PAS reports are posted on OGE's Website so were not uploaded by the NLRB to OMB Max. Question 50: While the NLRB does not have written procedures for following-up with delinquent filers, the 278 listings are closely monitored and either e-mail or telephonic follow-up is provided to filers. Questions 57 and 59: Filers are provided written counseling regarding potential or actual conflicts of interest identified by report reviewers, but filers are not required to follow-up with the DAEO regarding specific action taken concerning these conflicts.
National Science Foundation		#42 (Nominee/New Entrant) - the "other" new entrant reports discrepancy between number filed and number required to file due to both filers having a 90-day extension to file new entrant report; both due in March, 2013
National Security Staff		Question #42 (combination filers): We requested the one remaining disclosure from the 278 filer. This individual was a long-time NSS employee, and is currently in retirement.

National Transportation Safety Board		43. We issue reminders, then identify and contact potential late filers before the due date, involving the supervisor as appropriate. Extensions have been granted upon reasonable request. We have not had any problems with delinquent filers as a result. 45. We granted more extensions than we normally would have due to concerns over the STOCK Act posting requirement 50. Two filers had recusals; one had divestitures and recusals; and one had a divestiture with no recusals (other than in connection with the divested interests until they were divested), and divested pursuant to a Certificate of Divestiture. 51. One transaction report was submitted that was not required to be filed, so the filer was notified and it was not considered filed.
Office of Management and Budget		Q41. However, reviews by accountants are encouraged, and, staffing permitted, additional OGC lawyers assist in 278 review, so that in the ideal case multiple reviewers check each form. Q45. Note: late filing was usually due to miscommunication amidst extraordinary staff turnover – this year we improved our processes and worked to achieve 100% compliance with filings and will continue to strive for improvement in the timeliness of filings.
Office of National Drug Control Policy		No 278-T transaction reports were filed at ONDCP in 2012
Office of the Director of National Intelligence		For #49 and 51 - don't track.
Office of the Vice President		42. OGE 278 Reports OVP employees are hired under Title 3 hiring authority and are therefore listed as “other” employees required to file a public financial disclosure report. Two OVP employees submitted termination reports to satisfy both the annual and the termination requirements. Of the OVP employees on the Senate payroll, one employee was required to file a public financial disclosure form with the Senate Ethics Committee. That individual is not included in OVP’s totals. Though OVP does not have an electronic financial disclosure program, staff may complete the form electronically, print, and submit their reports. Reports are also scanned and saved. None of the listed reports have been uploaded for public posting due to the

		postponement of this STOCK Act requirement. .
Small Business Administration	N/A	OGE Reviewer's Comment: No follow-up was necessary with agency re the number of waivers granted on question #50.
Surface Transportation Board		General. We only have 10 public filers, including PAS employees. Of those 10, really only one has substantial holdings, but he is very careful with his transactions. We had no violations in 2012.
US Postal Service		Question 42 - The total number of termination reports due for 2012 were 9; 9 were received. We also need to make some changes to our previous responses to Question 42: Number of Nominee/New Entrant Filers: Under the column PAS, we should have 3 required and 3 received; in the "other," our responses should be 11 required and 11 filed. In termination box, under the column "other," we had 7 term required, with 7 received. Question 44 - Yes, when warranted.
US Trade and Development Agency		Question #42: USTDA will post the 278 Reports to OMB MAX pending the final determination and advisory from OGE on this issue.
White House		Question 49: Please note that one combination (annual/termination) 278 filer did not complete her report. The White House Counsel's Office has followed up with her.

PART 7. CONFIDENTIAL FINANCIAL DISCLOSURE

53) Statistics on Confidential Financial Disclosure Reports (excluding SGEs):*

	Required	Filed
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OGE Form 450	289,759	282,209 (97%)
OGE Form 450A	1,486	8,413
OGE-approved alternative form)	65,176	66,668
TOTAL	356,447	357,320

54) Does your agency have written procedures for following up with delinquent confidential financial disclosure (OGE Form 450) filers?*

() Yes **90**

() No **45**

55) Number of 18 U.S.C. § 208(b)(1) waivers granted to confidential financial disclosure (OGE Form 450) filers in 2012: **47**

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds.
Advisory Council on Historic Preservation	N/A	Part 7 (overall): There are a few employees from other federal agencies that serve on our board (as designees of the heads of their agencies) and file OGE Form 450 at their respective agencies. The ethics officials at their respective agencies handle the collection and review of their OGE Form 450. We get a copy of their filings on or before August 1, but we do not track the issues that are the topic of most questions in this Part. We have therefore not included their numbers in our answers to this Part.

Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Consumer Financial Protection Bureau		Question 53: One annual 450 filer is out on long-term disability leave. One new entrant 450 filer left federal employment prior to filing the 450.
Defense Contract Audit Agency		53. OGE approved alternate form is use of the Army's automated filing system - Financial Disclosure Management (FDM) system
Defense Security Service		Question # 53. In 2012, DSS had two employees who were required to file Confidential Financial Disclosure Reports, but who did not file a report. One employee is a military reservist who was deployed overseas during the entire year and who has not yet returned to work at DSS. The other employee was absent from work for most of 2012 due to a serious injury/illness and has not yet returned to work at DSS
Defense Threat Reduction Agency	N/A	# 53 In 2012, DTRA used the Financial Disclosure Management System for the filing of all annual and new entrant OGE 450 reports.
Department of Defense		Generally, the discrepancy in the number of reports required to be file and the number of reports received is the result of (1) the departure of the filer after the 1st of the year, but prior to the filing deadline, and (2) the granting of war zone filing extensions.
Department of Energy		Question 53. Statistics on Confidential Financial Disclosure Reports, difference in number required and filed due to filers who were unable to file due to extenuating circumstances.

Department of Health and Human Services		Q53 – This chart shows 129 unfiled OGE Form 450 reports. There are a variety of causes. 8 - New Entrant filers who were hired at the end of 2012 and were still within their 30 day filing window. 3 - New Entrant filers were granted extension to file. 2 - New Entrant filers are on extended medical leave. 9 - New Entrant filers were not appropriately notified of their filing deadline, 3 of the 9 reports have since been filed. 1- Incumbent filer sent his report but it was never received by the agency, agency is obtaining a copy of the report from filer. 2 - Incumbent filers mistakenly submitted the OGE Form 450A, this mishap was not discovered until compiling the numbers for the questionnaire. Those filers have been notified and will submit an OGE Form 450 this filing cycle. 104– OGE Form 450 filers are being administratively tracked for compliance, all but 40 of these are recent New Entrant reports.
Department of Homeland Security	Federal Law Enforcement Training Center	Question #53: 353 employees were required to receive training, only 344 received it. Of the nine employees who did not receive training 8 retired and 1 was on extended sick leave.
Department of Homeland Security	U.S. Customs and Border Protection	53. Some OGE 450s are noted as not having been completed because the employee is on extended leave, on TDY in Iraq, or retired. 54. The Agency's automated HRBE system will be able to track these delinquencies and send reminders in the future.
Department of Homeland Security	Transportation Security Administration	Q. 53 The number of reports required to be filed vs. actually filed incorporates employees who departed the agency, left filing positions, retired, were on medical leave and delinquent filers.
Department of Homeland Security	Federal Emergency Management Agency	#53 -Number based on lists OGE450 names received from each program office submitted in 2012. Number is best approximation as staffing in filing positions fluctuates throughout the year due to new employees, reassignments, employees who leave Agency.
Department of Homeland Security	Office of Inspector General	Q.53 - Due to an administrative error, the reported data is not accurate for the number of reports required to be filed, and actually filed. I will submit corrected numbers the week of February 4, 2013.

Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 53: The breakdown is 2501/630(IG).
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives	Missing 450 reports are due to a combination of employees being promoted to SES, retirements, and employees who have left ATF in the calendar year.
Department of Justice	Civil Division	53. Nonfilers: 3 on active military duty, one on detail to the White House, one noncompliant
Department of Justice	United States Trustee Program	Two employees did not file annual confidential financial disclosure reports. One was on extended medical leave and one was deployed for military service. The figures reported in response to Question 62 include new entrant 450 reports. The enter-on-duty date for one new employee that is designated a confidential financial disclosure filer was December 31, 2012. The response to Question 62 does not include this employee because the employee did not file (and was not required to file) the new entrant confidential disclosure report before the end of 2012.
Department of Justice	Environment and Natural Resources Division	Q. 53: One employee, who was on extended medical leave and is now retiring, did not file.
Department of Justice		53. Outstanding Confidential Report: filer left DOJ.
Department of Justice	Executive Office for United States Attorneys	Q 53: reports not filed due to military absence, out of the country detail.
Department of Justice	Office for Justice Programs and Office on Violence Against	Q. 53: OJP: There was a new hire in the later part of 2012 who was overlooked for filing a form 450, but who will file a form 450 in 2013. OVW: One filer was detail to another division and filed there - OVW obtained a copy of filer's report.

	Women	
Department of Justice	Drug Enforcement Administration	One delinquent 450. This employee was stationed in one of the most dangerous overseas locations and communication with him was difficult. Despite sending multiple reminders, we were never able to communicate with this particular filer. This employee no longer serves in a covered position. The employee has filed a 450 in the past and his report presented no conflicts.
Department of Justice	United States Trustee Program	Two employees did not file annual confidential financial disclosure reports. One was on extended medical leave and one was deployed for military service. The figures reported in response to Question 62 include new entrant 450 reports. The enter-on-duty date for one new employee that is designated a confidential financial disclosure filer was December 31, 2012. The response to Question 62 does not include this employee because the employee did not file (and was not required to file) the new entrant confidential financial disclosure report before the end of 2012.
Department of the Treasury	Bureau of the Mint	The United States Mint does not maintain records regarding the number of OGE Form 450 filers versus OGE Form 450A filers.
Department of the Treasury	Bureau of Public Debt	53. There is a discrepancy of one between the number of filers required to file and the number of filers who filed a confidential disclosure report. An employee transferred to another bureau within Treasury and did not file a report with the Bureau of the Public Debt.
Department of the Treasury	Comptroller of the Currency	Regarding question 53, of the four filers who did not file in 2012, two were not designated as filers due to an oversight. We have since enhanced our tracking system to automatically designate filers based on certain criteria, which should eliminate this as an issue. One joined in November 2012 and filed her report late. The fourth filer had a name change, which resulted in a delay in identifying the filer correctly.

Department of the Treasury	Financial Crimes Enforcement Network	We had one employee who was required to file an OGE 450, who did not do so before going on extended administrative leave. Due to the circumstances surrounding her extended administrative leave, the FinCEN Chief Counsel determined that we should not require the employee to submit an OGE 450.
Department of Veterans Affairs		Question 53: The discrepancy between 450s required and filed exists because nine employees who were assigned New Entrant reports due in late 2012 failed to file by the deadline. We are following up with the delinquent filers and their supervisors.
Export-Import Bank of the United States	N/A	Q 53: 1 employee on extended military leave
Federal Communications Commission		53. The discrepancy in numbers is due to employees that left during the filing period, were on extended leave or absence and those that have difficulty filing or are unresponsive.
Federal Mediation and Conciliation Service		The difference between the 18 450 filers required to receive/receiving training (Q. 29) and the 21 filing OGE Form 450 (Q. 53) was due to 1 retirement, 1 resignation and 1 long-term administrative leave which occurred during calendar 2012.
General Services Administration	N/A	#53 - 187 employees terminated/transferred/deceased.
Morris K. Udall Foundation		Q #53 - There are three employees who are required to file OGE-450 (General Counsel/Contracting Officer, Executive Director and Deputy Executive Director).
National Aeronautics and Space Administration		N/A

National Archives and Records Administration		One filer is late, we are following up currently.
National Credit Union Administration		53. We have one filer who is on extended military leave; he has not filed.
National Geospatial-Intelligence Agency (NGA)		All NGA numbers are classified and will remain on file at the NGA Ethics Program Office
National Labor Relations Board		Question 53: The two individuals who did not file transferred to other federal agencies prior to the due date for the filing of reports, and it was determined by the then-DAEO that there would be no follow-up with filers, requiring them to file their reports. Question 61: The NLRB's pool of confidential filers is relatively small and, while the Agency does not have written procedures for following up with delinquent filers, the system used for filing reports is closely monitored and filers provided with periodic reminders. FDOonline also provides for the sending of automatic reminders to filers by the system administrator.
National Science Foundation		#53 - One filer was referred to the IG; Two are in the process of filing; and One is a new entrant who has an extension until 3/17/13.
National Security Staff		Question #53: The response to this question reflects direct hires. Some detailees to the NSS, however, are required to complete 450 forms as well.
National Transportation Safety Board		54. Please see comments related to Item 43. We have not had problems with 450 delinquencies, perhaps because with a relatively small number of filers, we are able to keep closer track and identify potential issues soon enough to avoid delinquencies.
Occupational Safety and Health Review Commission		Q #53 – On prior questionnaires agency lists four (4) OGE-450 filers. This year that number decreased to three (3) because one of the four filers was promoted to 278 filing position.

Office of Management and Budget		Q55. [their Forms were submitted by March 1, 2012.]
Office of Special Counsel		55. On confidential filer has a waiver that was reviewed and continued. OSC did not grant any new waivers in 2012.
Office of the Vice President		53. Statistics on Confidential Financial Disclosure Reports (excluding SGEs): Certain OVP employees are on the Senate payroll and are therefore subject to the Senate rules governing financial disclosure. The Senate does not have a confidential financial disclosure form. OVP requires some of its employees, who are on the Senate payroll but would be required to complete an OGE Form 450 if they were on the Executive Branch payroll, to file an OGE Form 450. These totals for these questions include all OVP employees, regardless of payroll status, who are required by regulation or OVP policy to file an OGE form 450. One confidential filer transferred in December 2012 from a public filing position in another Executive Branch agency. The required 278 report filing requirements satisfied the OVP 450 reporting obligation. This individual is not reflected in the numbers reported
Pension Benefit Guaranty Corporation		Question 55 – SGE required modification of waiver
Securities and Exchange Commission		Q #53 - 2775 Annual, New Entrant/Promotion & New Entrant/Hire Note: This number includes all (Annual, NE/Prom and NE/Hire) required to file the form.
Social Security Administration		Q53 Two employees unavailable due to illness or military leave. As part of the reorganization the agency is conducting an agency wide review of the filing status of our employees. The change in numbers reflects that process.
US Postal Service		Question 54 - Process built into the electronic filing system.

PART 8. ADVISORY COMMITTEES/SPECIAL GOVERNMENT EMPLOYEES

56) Number of advisory committees (*do not include Federal Advisory Committees (FACA)*)* 161

57) Number of advisory committee members (*do not include FACA members*)* 2644

58) Does your agency provide ethics program services for any boards or commissions that are independent of your agency?*

() Yes **13**

() No **118**

Please provide the names of the boards and commissions*

1: Agency	2: Subcomponent (if applicable)	Please provide the names of the boards and commissions
Corporation for National and Community Service		White House Council for Community Solutions which sunset in December 2012.
Defense Intelligence Agency		DIA Board of Advisors and National Intelligence University Board of Advisors.

Department of Agriculture		The Office of Ethics provides services to the Federal Crop Insurance Corporation and Delta Regional Authority. The Office of the Inspector General provides services to the Council of Inspectors General for Integrity and Efficiency.
Department of Commerce		Caribbean Fishery Management Council Gulf of Mexico Fishery Management Council Mid-Atlantic Fishery Management Council New England Fishery Management Council North Pacific Fishery Management Council Pacific Fishery Management Council Western Pacific Fishery Management Council
Department of Education		National Assessment Governing Board; National Council on Disabilities
Department of Labor		-Counsel for Ethics provides advice to Overseas Private Investment Corporation's (OPIC) General Counsel regarding DOL Deputy Secretary's service on OPIC board
Department of State		International Boundary and Water Commission International Joint Commission International Boundary Commission Border Environment Cooperative Commission
Department of the Interior		Upper Colorado Commission, Canadian River Commission, Klamath River Compact Commission
Department of the Treasury		For the President's Advisory Council on Financial Capability and the President's Council on Jobs and Competitiveness, both FACs, SGEs received ethics training and representatives received a broad overview of misuse of position.
International Joint Commission		International Boundary Commission
National Archives and Records Administration		Public Interest Declassification Board
Recovery Accountability and	n/a	Recovery Independent Advisory Panel - A FACA Board

Transparency Board		
Social Security Administration		Social Security Advisory Board. The Federal Old-Age and Survivors Insurance Trust Funds

59) Statistics on financial disclosure reports filed by SGEs**

	Confidential Reports (OGE Form 450)	Confidential Reports (OGE Form 450)	Public Reports (OGE Form 278)	Public Reports (OGE Form 278)
	REQUIRED	FILED	REQUIRED	FILED
Advisory Committee Members (FACA & non-FACA)	20,896	20,655(99%)	20	18 (90%)
Experts/Consultants	1238	925 (74%)	50	43 (86%)
Board Members	279	265 (95%)	67	69
Commissioners	120	117 (98%)	8	8 (100%)
Other (specify):	1,727	1,740	113	110 (97%)
TOTAL	24,262	23,740 (98%)	258	248 (96%)

* For the definition of SGEs, see footnote 1.

60) Number of SGE filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2012* 1078

61) Number of § 208(b)(1) waivers granted to SGEs in 2012* 38

62) Number of § 208(b)(3) waivers granted to SGEs in 2012* 228

63) Does your agency have written policies or procedures for designating SGE status?*

() Yes **38**

() No 40

() Not applicable 57

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds.

1: Agency	2: Subcomponent (if applicable)	ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds.
Administrative Conference of the United States	N/A	#56: ACUS has a single advisory committee chartered under FACA, consisting of the entire membership of the Conference. The FACA committee has 6 working subcommittees that are not chartered under FACA and are not considered to be FACA committees. #57: The single FACA committee has 101 statutory members. Pursuant to the ACUS bylaws, 24 additional individuals serve as non-statutory, non-voting members of the

		FACA committee and its 6 subcommittees. #59: ACUS SGEs file a special (OGE-approved) financial disclosure form prior to each semi-annual FACA meeting they attend, in lieu of the OGE Form 450.
Advisory Council on Historic Preservation	N/A	See the "Additional Comments" for Question 4 on Part I, and for Parts 6 and Part 7, with regard to the discrepancy in numbers of reported "SGEs" from previous years.
Central Intelligence Agency		We have answered as completely as possible, although we have not been able to provide some of the requested information. Pursuant to 50 U.S.C. 403g, the Central Intelligence Agency is exempt from disclosing the number of personnel it employs. Additionally, some of the questions request other information that, with respect to the Agency, is classified. We will be pleased to make the complete data available for review to cleared representatives of the Office of Government Ethics.
Commission on Civil Rights	n/a	#59 The Commission's SGE/FACA committee members are not required to file an OGE 450. They are required to file the Confidential Conflict-of-Interest Statement for USCCR State Advisory Committee Members Form CCR17, an alternate financial disclosure form approved by OGE.
Committee for Purchase from People Who Are Blind or Severely Disabled		President appoints 4 private citizens to be members of the Committee. They serve for 5 year terms. They are not "advisory" but manage a congressional mandated program. For ethics purposes, they are considered SGEs.
Consumer Financial Protection Bureau		Question 59: The "Other" field is for an Assistant Director of Research
Corporation for National and Community Service		59. At the last questionnaire, I was still collecting 450s from White House Council members. Two members did not eventually file their reports. Both left the Council. 60. We had new board members confirmed during 2012 and they each had ethics agreements.

Defense Finance and Accounting Service		DFAS has no SGEs, Advisory Boards or Independent Commissions.
Department of Agriculture		#56) The Farm Service Agency has State Committee Members in every state, including the Virgin Islands, Puerto Rico and Guam. These are political appointments and serve as SGEs. The Foreign Agriculture Service has one non-FACA advisory group known as the Consultative Group on Child Labor and Forced Labor, but none of the members serve as SGEs. #59) The three Commissioners serve on the Federal Crop Insurance Corporation. The Agricultural Research Service has 124 collaborators and National Institute of Food and Agriculture has 36 panel managers who file confidential financial disclosure reports for their SGE appointments. These filers are reported as "Other."
Department of Health and Human Services		Q59 Other (specify) - National Disaster Medical Response System (NDMS). Q59 Total (OGE Form 450) Filed – The reason for the difference between the number of reports required to be filed and the number of report actually filed varies from case-to-case. Several SGEs did not participate in any meetings and thus were not required to file a report, one SGE received a waiver due to illness, and seven are being administratively removed from their respective committees for failure to file a report.
Department of Homeland Security	U.S. Customs and Border Protection	1. The three advisory committees are: the Simplified Processes Working Group (14 members); the Role of the Broker Precertification Group (15 members); and the Trade Support Network (300 members).
Department of Homeland Security	Immigration and Customs Enforcement	Part 8. This agency has no SGEs or advisory committees (FACA or non-FACA).
Department of Homeland Security	Federal Emergency Management Agency	#59. FEMA has USFA Board of Visitors and the National Advisory Committee (NAC) (and one inactive FACA). Of the 33 NAC members 14 are SGEs. All BOV and NAC members file an OGE450. We also have 2 Experts/Consultants and 3 Private Sector Representative (marked Other) who also file OGE450s.

Department of Housing and Urban Development	HUD Office of Inspector General (OIG) in effect as of 9 5 2012	Question 59: The two reports not filed are for SGE's with re-appointment dates of October 2012 were determined to have duties where “the possibility that the incumbent will be involved in a real or apparent conflict of interest” is too remote and requiring them to file is unnecessary. See 5 CFR § 2634.904(b). Both positions are with the Office of the Secretary. We are waiting to hear confirmation from that office that both positions are very intermittent (far less than 60 days per year) and are only to advise on the Affirmatively Furthering Fair Housing regulation, a policy matter of general applicability.
Department of Justice	Civil Division	The Civil Division was not experienced with SGEs, and in 2012 there was confusion as to whether the SGEs were required to submit financial disclosure forms. That problem has been corrected for 2013.
Department of Justice	United States Trustee Program	To clarify Part 8 Questions 68-72, the United States Trustee Program does not have any SGEs.
Department of Justice	United States Trustee Program	To clarify Part 8 Question 68-72, the United States Trustee Program does not have any SGEs.
Department of the Treasury	Financial Crimes Enforcement Network	Part 8 General Comment: FinCEN does not have any SGEs. The members of our advisory committee are institutions, not individuals.
Department of the Treasury	Internal Revenue Service	Q #59 - Advisory Committees/SGEs, we indicated that 20 OGE Form 450 reports were required, and 18 were received. We are still in the process of collecting the two outstanding reports. The Questionnaire should also read that zero OGE Form 278 reports were required by SGEs in 2012, rather than eight. Eight was a typo.
Equal Employment Opportunity Commission		None of EEOC's SGEs was a member of an advisory committee. However, all 9 SGEs filed 450s.
Marine Mammal Commission		Question 59 - Followed up with agency EO, none of the SGEs went over 60-day threshold; therefore, they did not have to file a 278 report.

Millennium Challenge Corporation		MCC has two private sector board members. The initial report submitted is an OGE 278. Upon nomination the report becomes confidential.
Morris K. Udall Foundation		Q #59 - The Udall Foundation currently has 12 active Trustees who are members of our Board of Trustees. They are our SGEs. Three trustees hold high level, appointed government positions within 1) the Department of Education; 2) The Department of Interior; and 3) Council on Environmental Quality (Trustee list here). Because of these positions, the three trustees are required to file 278s with their respective agencies. As our SGEs, however, they are only required to file a 450 with the Udall Foundation. Two of the trustees provide me with a copy of their 278. One prefers to file a 450 with the Foundation instead. That is why I indicated that no Board members were required to file 278s, but that two DID.
National Aeronautics and Space Administration		Item 59. Statistics for SGE's who are not advisory committee members are not separately tracked by NASA's electronic filing and tracking system. Item 60. NASA did not have a vehicle to track specific corrective or remedial actions described in this item on an agency-wide level for the 2012 filing cycle.
National Archives and Records Administration		We understood one SGE (an expert/consult) was to be separated from the agency, and thus we did not send him a form. We understand he is still on our employment roll and will follow up. We continue to follow up with the other advisory committee members.
National Endowment for the Arts	N/A	See attachment for Comments on Part 8.

National Endowment for the Humanities		Part 8, Q 60: One new member of the National Council on the Humanities (NEH's statutory FACA advisory committee) was confirmed by the Senate and appointed by the President in 2012. This SGE, pursuant to his ethics agreement, has agreed to recuse himself from any NEH-related work, including reviewing or making recommendations on grant applications, that involves organizations or people with which he is affiliated.
National Geospatial-Intelligence Agency (NGA)		All NGA personnel numbers are classified and will remain on file at the NGA Ethics Program Office
National Mediation Board		
National Science Foundation		#60 - We generally do not track but are aware that two Presidentially appointed Board Members had to resign from foreign positions because of Emoluments Clause requirements.
National Transportation Safety Board		59. The NTSB historically has not employed SGE's, and did not during the past year.
Peace Corps	NA	We were just informed of a new SGE and will be requesting that she file her OGE-450.immediately.
Securities and Exchange Commission		we use the OGE standards for designating SGEs
Special Inspector General for Iraq Reconstruction		63. SIGIR has no SGEs.
Tennessee Valley Authority		Q #53 - See explanation for question #4.
US Postal Service		Question 63 - Statutorily defined.
White House		Question 66: Please note that advisory committee members filed either an OGE 450 or an OGE-approved alternate confidential financial disclosure form.

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1: Agency	2: Subcomponent (if applicable)	ADDITIONAL QUESTIONNAIRE COMMENTS
Armed Services Board of Contract Appeals		Part 6, question 42: All of the ASBCA's 278 filers are "Other" employees. Looking at last year's report, it appears that we coded our 278 filers as "Schedule C" employees. That was a mistake.
Commission for the Preservation of America's Heritage Abroad		I tried to answer the questions as applicable to our agency with 21 very-part-time SGEs, one lower level Federal employee, two full-time contractors, and one part-time contractor and privately as well as Federally-funded.
Council of Economic Advisers		Clarification re: Annual Training Question: We train all employees whether or not they file any disclosures. The 19 in Column "Other" did not file other forms. They do not qualify as public or confidential filers.
Department of Justice	Office for Justice Programs and Office on Violence Against Women	OJP and OVW are not designated separate from each other and therefore one Questionnaire is submitted combining responses for both components.
Department of Justice	Drug Enforcement Administration	450 Filers required to receive annual ethics training: Because we incorporated our ethics training in DEALS, 450 filers were not notified of the 2012 annual training requirement until December 21, 2012. Despite the year-end notice, 248 of the 535 450 filers required to take annual ethics training have already done so. Additionally, filers are located throughout domestic and foreign posts. Because of the nature of some foreign posts, some filers are TDY for extended periods of time without access to DEALS. Additionally, mission-related requirements prevent the filers from immediately accessing the training. Our goal is to complete training NLT February 4, 2013. Other DEA employees required to receive annual ethics training: Because of the sensitivity of their positions, certain non-filing employees have been designated to receive annual ethics training

		(e.g.CORS, purchase card holders.) These employees were also first notified of the training requirement on December 21, 2012. Despite the year-end notice, 147 of the 327 employees from this group required to take annual ethics training have already done so. Additionally, some of these employees are in foreign posts with the same TDY issues or have mission requirements as described above. Our goal is to complete training NLT February 4, 2013.
Department of the Treasury	Special Inspector General for the Troubled Asset Relief Program	For questions 6-14, please refer to the submission by the US Treasury Departmental Offices.
Federal Reserve Board	N/A	<p>Include Part II. Program Administration #17 b) Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2012? Check all that apply. <input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Mentoring <input checked="" type="checkbox"/> Developmental assignments (e.g., detail assignments, cross training, job rotation, use of Agency developmental programs such as interns, fellows, or leadership development) <input checked="" type="checkbox"/> Individual development plans <input checked="" type="checkbox"/> Written standard operating procedures <input checked="" type="checkbox"/> Knowledge library (Intranet, videos, shared drives) <input checked="" type="checkbox"/> Competency/skills gap assessment <input checked="" type="checkbox"/> Resources assessment (personnel and/or financial) <input checked="" type="checkbox"/> Other (specify)</p> <hr/> <p><input checked="" type="checkbox"/> None</p>
National Endowment for the Arts	N/A	<p>Attachment: Additional Comments Part 8 Question 59 The discrepancy between the wording in questions three and four, and the wording in the chart seems to imply that each SGE is required to file one report per year. This is not necessarily the case at the National Endowment for the Arts. Depending on the advisory committee, some SGEs must file more than one report, while others do not file any in a given calendar year. The filing requirements for each of the four committees are described below: Arts Advisory Panel: Members of this committee evaluate and make recommendations on grant proposals. They serve as requested, and they may serve more than once per year. They are required to submit a financial disclosure (alternative form) every time they serve. Consequently, the number of forms required in 2012 is higher than the number of individuals serving on this committee. Federal Advisory Committee on International Exhibitions (FACIE): Members of this committee evaluate and make recommendations on grant proposals. They</p>

		<p>serve for one-year terms, and they may serve more than once per year. They are required to submit a financial disclosure (alternative form) every time they serve. However, FACIE did not meet in 2012, their last meeting was in December 2011 so there is nothing to report for 2012. National Council on the Arts (NCA): Members of this committee review the recommendations of the Arts Advisory Panels and make further funding recommendations to the Chairman of the Agency. Members of this committee serve six-year terms, and they are asked to attend three meetings per year. They are expected to submit a financial disclosure (alternative form) in advance of each Council meeting, regardless of whether they attend. Consequently, the number of forms required in 2012 is higher than the number of individuals serving on this committee. President's Committee on the Arts and the Humanities (PCAH): Members of PCAH are appointed by each administration, and represent some of the country's most prominent and successful artists, philanthropists, and businesspeople. They file OGE Form 450 before they are formally appointed. However, due to the nature of their work, they are generally not annual filers. A breakdown of the totals is provided below:</p> <table border="1"> <thead> <tr> <th>Committee</th> <th>Type</th> <th>Expected</th> </tr> </thead> <tbody> <tr> <td>Forms Received</td> <td>Forms People</td> <td>Arts Advisory Panel</td> </tr> <tr> <td>FACA 386</td> <td>386</td> <td>378 FACIE</td> </tr> <tr> <td>FACA 0</td> <td>0</td> <td>0 NCA</td> </tr> <tr> <td>FACA 48</td> <td>35</td> <td>16 PCAH</td> </tr> <tr> <td>FACA 0</td> <td>0</td> <td>48 Fast</td> </tr> <tr> <td>Track Readers non-FACA</td> <td>24</td> <td>24</td> </tr> <tr> <td>24 Total:</td> <td>458</td> <td>445</td> </tr> </tbody> </table> <p>466 Question 63 The NEA follows the definition provided in 18 U.S.C. 202(a).</p>	Committee	Type	Expected	Forms Received	Forms People	Arts Advisory Panel	FACA 386	386	378 FACIE	FACA 0	0	0 NCA	FACA 48	35	16 PCAH	FACA 0	0	48 Fast	Track Readers non-FACA	24	24	24 Total:	458	445
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FACA 48	35	16 PCAH																								
FACA 0	0	48 Fast																								
Track Readers non-FACA	24	24																								
24 Total:	458	445																								
National Transportation Safety Board		<p>For Item 42, please note that we interpreted "Posted to OMB MAC" to refer to the process required by the STOCK Act to post forms on line, which has been delayed. We have, however, uploaded to the OGE/MAX database substantially all reports that may be required to be posted, and will continue to do so. We appreciate the involvement we have had with OGE, ranging from in-person consultation on difficult issues, to training, consultations on PAS/DAEO 278s, nominee issues, and reality checks and advice sought from our Team One. In all cases, the OGE folks have been understanding, courteous, professional, knowledgeable, and timely in their involvement with us. We look forward to the next OGE conference, which is a boost to our morale and knowledge. Thank you!</p>																								
Nuclear Regulatory Commission		<p>Additionally, questions can be directed to Ethics.Resource@nrc.gov.</p>																								

Nuclear Waste Technical Review Board		The information is based on the appointment of 8 new SGEs as well as the termination of 8 SGEs. In addition, the Board had 1 person to retire February 2012.
Office of National Drug Control Policy		ADAEO Linda Priebe is an 80% FTE ONDCP employee.
Office of Science and Technology Policy		I wish that your software program sent me a copy of the questionnaire when I submitted the final version to OGE.
Postal Regulatory Commission		Some questions did not provide a space or box to place an answer.
Recovery Accountability and Transparency Board	n/a	We are undergoing an OGE audit covering the same period
Uniformed Services University of the Health Sciences		Note: one filer deceased during OGE 278 filing period

2013 Annual Agency Questionnaire

A Snapshot View of the Executive Branch Ethics Program

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

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Section 1 - Introduction

The purpose of this report is to share with you, the ethics community, summary data compiled from the agency questionnaires that you submitted to the U.S. Office of Government Ethics (OGE) in January 2014. The compiled data provides a “whole picture” view of the executive branch ethics program, a view that can be difficult to see from the perch of your own agency’s ethics program. We hope you find this report informative as well as useful. For example, you may consider using the data to benchmark your agency ethics program or to build a case for additional program resources.

The first section of the report provides a brief overview of the legal reporting requirement, OGE’s survey methodology, and the limitations of the data collected. The second section highlights key data points from the compiled data for each of the major categories of data collected. The third section provides aggregate data for each question. Finally, the Appendix contains sixteen tables of additional comments taken from the individual responses to the annual questionnaire (*note: names of agencies have been removed from the associated comment*).

Requirement

Pursuant to section 402(e)(1) of the Ethics in Government Act of 1978, as amended, executive branch agencies are required to submit an annual report to OGE (report or annual questionnaire). Under 5 C.F.R. § 2638.602, the report is due to OGE on or before February 1 of each year and covers the previous calendar year. Ethics officials are asked to provide information on the following topics:

- Organizational Structure
- Ethics Program Administration
- Advice and Counseling
- Education and Training
- Financial Disclosure (Public and Confidential)
- Enforcement
- Federal Advisory Committee Act/Special Government Employees

Methodology

Each agency received an advance copy of the questionnaire in December 2013 and a hyperlink to the questionnaire in January 2014. Data was collected through Survey Gizmo, an online survey collection tool. Upon receipt, each questionnaire was reviewed by an OGE Desk Officer. As necessary OGE Desk Officers followed-up with individual agencies for additional information or when clarification was needed. The agency responses were then compiled into this summary report.

Response Rate: 100% (136 agencies)

Data Limitations

When reviewing this report, it is important to keep in mind the limitations of the data on which it is based. While OGE reviews annual questionnaire responses for anomalies and conducts follow up as necessary, OGE does not independently verify all of the information submitted by agencies. OGE notes that there may be some differences in how agencies compile numeric responses and interpret some of the questions.

Section 2- Key Highlights¹

DAEO/ADAEO

- There are very few DAEO/ADAEO vacancies. (Q.9)
- Approximately 57% of DAEOs have less than 4 years of experience in the position. (Q.9)
- Approximately 57% of ADAEOs have less than 4 years of experience in the position. (Q.9)
- Approximately, 89% of DAEOs spend less than 50% of their time on ethics. (Q.9)
- Approximately, 70% of ADAEOs spend less than 50% of their time on ethics. (Q.9)
- A large majority of DAEOs (90%) and ADAEOs (95%) are career employees. (Q.9)
- 110 DAEOs and 87 ADAEOs have ethics duties as an element in their position description. (Q. 14)

Resources

- There are approximately 5,492 part-time and full-time ethics officials. (Q. 11)
- Approximately a quarter of the agencies stated they need additional resources. (Q. 12)

Structure of the Program

- 84% of ethics programs are managed from a central office. (Q. 15)
- Financial disclosure, ethics advice and counseling, and ethics education and training are three areas most likely to have been delegated outside an agency's central ethics office. (Q. 15)

Program Administration

- Between 2012 and 2013, there was a shift in where the most time was spent administering the ethics program. (Q. 21)
Top 4 in 2012: (1) Public financial disclosure; (2) Confidential financial disclosure; (3) Written opinions; and (4) Education and training
Top 4 in 2013: (1) Written opinions; (2) Confidential financial disclosure (3) Public financial disclosure; and (4) Education and training
- Half of the agencies reported conducting self-assessments. (Q. 22)

Leadership

- 88% of DAEOs reported directly to the agency head about the ethics program. (Q. 16)

Financial Disclosure

Note: #s reflect the number of reports submitted rather than the number of filers.

- 88% of ethics officials receive timely notification of new entrant employees required to file financial disclosure reports. (Q. 26)
- Schedule C employees had the lowest compliance rate for filing termination reports (89%). (Q. 48)
- 9,541 periodic transaction reports were filed. (Q. 49)
- Intermediate review of public financial disclosure reports by someone other than an ethics official is not a common practice. (Q. 51)
- The U.S. Treasury collected approximately \$10,800 in late filing fees. (Q. 52)
- 71% of agencies have a process for conducting follow-up with delinquent filers. (Q. 50)
- Approximately 13% of executive branch employees file confidential reports. (# of 450s filed (Q. 60)/2.7million federal employees)

¹ Highlights are drawn from agency responses as reported in calendar year 2013 unless otherwise indicated.

E-filing

- 53 agencies (39%) reported using electronic filing at a cost of approximately **\$7,587, 339**. (Q. 24)

Succession Planning

- A large majority of agencies (88%) had ethics officials participate in professional development to assist them in carrying out their ethics duties. The top two sources for training were from OGE (93 agencies) or on-the-job training (67 agencies). (Q. 17)
- The top two tools for addressing succession planning were: (1) Training; and (2) Mentors. (Q. 23)
- 92% of agencies have written procedures for financial disclosure, pursuant to 5 U.S.C. app 402(d)(1). (Q. 27)
- 38% of DAEOs (of those that responded) are eligible to retire. 26% of ADAEOS (of those that responded) are eligible to retire. (Q. 9)

Initial Ethics Orientation

- The overwhelming majority (96%) of agencies conduct IEO as part of in-processing. (Q. 32)
- Classroom, written materials, in-person are the three most popular methods of delivery. (Q. 33)
- Most agencies (114) develop their own materials. Only 19 agencies indicated using materials developed by another agency. (Q. 34)

Annual Ethics Training

- Classroom instruction (96 agencies) and self-paced web videos (78 agencies) are the two most common methods of delivery. (Q. 36)
- 76% of agencies provided annual training to those not required by the statute to receive training. (Q. 38)
- Many agencies (42) provided additional training to procurement officials. (Q. 39)

Advice and Counseling

- The top 3 most frequent topics for providing advice and counsel changed between 2012 and 2013. (Q. 40)
2012: (1) Gift acceptance; (2) Outside employment/activities; and (3) Travel.
2013: (1) Gift acceptance; (2) Outside employment/activities; and (3) Conflicting financial interests.
- The most common ways to ensure consistent, accurate and timely advice were to review written opinions (105 agencies), discuss opinions with colleagues (111 agencies), and conduct periodic discussions with staff (94 agencies). (Q. 41)
- 2/3 of agencies provide notice of counseling when an employee files a notice of negotiating for employment. (Q. 42)

Enforcement

- The number of disciplinary actions and referrals remained fairly constant from 2012 (2,673) to 2013 (2,637). (Q. 43 and 44)

Remedies

- 70% of corrective actions taken in response to information regarding a conflict of interest reported on an OGE Form 278 were recusals. (Q. 56)

Program Reviews

- Each agency that received a program review report found the report helpful. (Q. 18)

Advisory Committees/SGEs

- The number of SGEs doubled from 2012 (20,134) to 2013 (41,335). (Q. 4)
- There are 206 non-FACA committees with 2,631 members. (Q. 62 and 63)

Section 3 - Compilation of Agency Responses

Organization/Resources

1) Agency* 136 (100% Response Rate)

- Access Board
- Administrative Conference of the United States
- Advisory Council on Historic Preservation
- African Development Foundation
- Agency for International Development
- Alaska Natural Gas Transportation Projects
- American Battle Monuments Commission
- Appalachian Regional Commission
- Appraisal Subcommittee
- Arctic Research Commission
- Armed Forces Retirement Home
- Armed Services Board of Contract Appeals
- Barry M. Goldwater Scholarship & Excellence in Education Foundation
- Broadcasting Board of Governors
- Central Intelligence Agency
- Chemical Safety and Hazard Investigation Board
- Christopher Columbus Fellowship
- Commission for the Preservation of America's Heritage Abroad
- Commission of Fine Arts
- Commission on Civil Rights
- Committee for Purchase from People Who Are Blind or Severely Disabled
- Commodity Futures Trading Commission
- Consumer Financial Protection Bureau
- Consumer Product Safety Commission
- Corporation for National and Community Service
- Council of Economic Advisers
- Council on Environmental Quality
- Court Services & Offender Supervision Agency for DC
- Defense Commissary Agency
- Defense Contract Audit Agency
- Defense Finance and Accounting Service
- Defense Information Systems Agency
- Defense Intelligence Agency
- Defense Logistics Agency
- Defense Nuclear Facilities Safety
- Defense Security Service
- Defense Threat Reduction Agency
- Denali Commission
- Department of Agriculture
- Department of Commerce
- Department of Defense
- Department of Defense Office of the Inspector General
- Department of Education
- Department of Energy
- Department of Health and Human Services
- Department of Homeland Security
- Department of Housing and Urban Development
- Department of Justice
- Department of Labor
- Department of State
- Department of the Air Force
- Department of the Army
- Department of the Interior
- Department of the Navy
- Department of the Treasury
- Department of Transportation
- Department of Veterans Affairs
- Election Assistance Commission
- Environmental Protection Agency
- Equal Employment Opportunity Commission
- Export-Import Bank of the United States
- Farm Credit Administration

() Farm Credit System Insurance Corp.	() Marine Mammal Commission	() Office of Management and Budget
() Federal Communications Commission	() Merit Systems Protection Board	() Office of National Drug Control Policy
() Federal Deposit Insurance Corporation	() Military Compensation and Retirement Modernization Commission	() Office of Navajo and Hopi Indian Relocation
() Federal Election Commission	() Millennium Challenge Corporation	() Office of Personnel Management
() Federal Energy Regulatory Commission	() Morris K. Udall Foundation	() Office of Science and Technology Policy
() Federal Housing Finance Agency	() National Aeronautics and Space Administration	() Office of Special Counsel
() Federal Labor Relations Authority	() National Archives and Records Administration	() Office of the Director of National Intelligence
() Federal Maritime Commission	() National Capital Planning Commission	() Office of the US Trade Representative
() Federal Mediation and Conciliation Service	() National Credit Union Administration	() Office of the Vice President
() Federal Mine Safety & Health Review Commission	() National Endowment for the Arts	() Overseas Private Investment Corporation
() Federal Reserve Board	() National Endowment for the Humanities	() Peace Corps
() Federal Retirement Thrift Investment Board	() National Geospatial-Intelligence Agency (NGA)	() Pension Benefit Guaranty Corporation
() Federal Trade Commission	() National Labor Relations Board	() Postal Regulatory Commission
() General Services Administration	() National Mediation Board	() Presidio Trust
() Harry S. Truman Scholarship Foundation	() National Science Foundation	() Privacy and Civil Liberties Oversight Board
() Institute of Museum and Library Services	() National Security Agency	() Railroad Retirement Board
() Inter-American Foundation	() National Security Council	() Recovery Accountability and Transparency Board
() International Boundary and Water Commission	() National Transportation Safety Board	() Securities and Exchange Commission
() International Joint Commission	() Nuclear Regulatory Commission	() Selective Service System
() International Trade Commission	() Nuclear Waste Technical Review Board	() Small Business Administration
() James Madison Memorial Fellowship Foundation	() Occupational Safety and Health Review Commission	() Social Security Administration
() Japan-US Friendship Commission	() Office of Administration	() Special Inspector General for Afghanistan Reconstruction
	() Office of Government Ethics	() Surface Transportation Board

Tennessee Valley Authority
 Uniformed Services
University of the Health
Sciences

US Postal Service
 US Trade and Development
Agency

Vietnam Education
Foundation
 White House

2) ...

3) Number of full-time agency employees as of December 31, 2013 (include employees detailed to another agency)***4,323,212** (note: OGE believes that agencies included military personnel when counting the number of employees. OPM reports that there are approximately 2.7 million employees.)

4) Number of special Government employees¹ (SGE) as of December 31, 2013*

41,335

5) Which office at your agency makes a determination that an individual is a special government employee?*

Table 1

6) If that office is not the ethics office, what is the role of the ethics office in that determination?

Table 1

7) With respect to SGE's who serve as members of a board or committee, is ethics training provided to SGE's prior to attendance at their first committee or board meeting?*

Yes **87 (64%)**

No **48 (36%)**

If so, which office provides the training?

Table 2

8) Number of IPAs² (Intergovernmental Personnel Act) as of December 31, 2013* **6,203**

9) Information about the DAEO and ADAEO*

		Position vacant		Time in this position			Percent of time spent on ethics of December 31, 2013?				Was the DAEO/A DAEO eligible to retire as of December 31, 2013?		Is the DAEO/ ADAEO ?	
	Yes*	No*	10 or more years*	5 - 9 years*	1 - 4 years*	Less than 1 year*	0- 25 %*	26 %- 50 %*	51 %- 75 %*	76 % - 100 %*	Yes*	No*	career employee*	political appointee*
DAEO	6	129	28 22 %	28 22%	51 39%	23 18%	94 73%	20 16%	4 3%	11 9%	47 38%	76 62%	104 90%	11 10 %
ADAEO	9	127	26 21 %	29 23%	45 36%	26 21%	69 56%	21 17%	9 7%	25 20 %	31 26%	87 74%	105 95%	6 5%

10) Number of Designated Deputy DAEO(s)*

893

11) Number of ethics officials who worked in the ethics program in 2013 (Do not include contractors)*

	Worked exclusively or full-time on ethics	Worked non-exclusively or part-time on ethics	TOTALS
HQ ethics officials (Include DAEO & ADAEO)	446	1098	1544
Regional/field office ethics officials	88	3860	3948
TOTALS	534	4958	5492

12) Additional resources are needed for the ethics program.*

() Yes **30 (22%)**

() No **106 (78%)**

13) Identify the agency ethics officials that have ethics duties as an element in their position descriptions. Check all that apply.*

[] DAEO **110**

[] ADAEO **87**

[] All Deputy DAEO(s) **33**

[] Some Deputy DAEOs **17**

[] None **16**

14) Identify the agency ethics officials that have ethics duties as an element in their performance appraisals. Check all that apply.*

DAEO **96**

ADAEO **83**

All Deputy DAEO(s) **37**

Some Deputy DAEOs **12**

None **23**

15) Is the entire ethics program solely managed from the agency's central ethics office ?*

Yes **114 (84%)**

No **22 (16%)**

If ethics program management has been delegated, indicate which elements have been delegated outside of the agency's central ethics office. Check all that apply.*

Public financial disclosure program **6**

Confidential financial disclosure program **16**

Ethics advice and counseling **15**

Ethics education and training **13**

Assessment of program performance **6**

Other: __ **Table 3**

None **0**

16) In the past year, the DAEO has reported directly to the agency head about the status of the ethics program.*

Yes **119(88%)**

No **16 (12%)**

17) Have any ethics officials received ethics training in 2013?*

Yes **120 (88%)**

No **16 (12%)**

Indicate the training provided to ethics officials to assist them in carrying out their ethics duties. Check all that apply.*

Training provided by OGE **93**

Structured training provided by your agency to groups of ethics officials (i.e., instructor-led training) **36**

One-on-one training provided by your agency **59**

Written education materials provided by your agency **56**

Multimedia training (e.g., videotaped or computer-based training) **53**

On-the-job training provided by your agency **67**

Other: ____

Table 4 * **25**

None **44**

18) Did you receive a final report of an OGE program review of your agency in 2013?*

Yes **19**

No **80**

N/A **37**

If so, did you find OGE's recommendations helpful?

Yes **19 (100%)**

No

Comments:

Table 5

19) Number of § 208(b)(1) waivers granted in 2013*

104

20) Number of § 208(b)(3) waivers granted in 2013*

189

Program Administration

21) Use the following scale to rate the amount of time your agency spends to administer each item. *

	No time	Limited amount of time	Moderate amount of time	Significant amount of time	Very significant amount of time	Rank Order 1-8 1 – Most amount of time
Public financial disclosure program (SF 278/OGE Form 278)	()	()	()	()	()	(460) 3
Confidential financial disclosure program (OGE Form 450)	()	()	()	()	()	(469) 2
Outside activity approval program	()	()	()	()	()	(360) 5
Written opinions and counseling	()	()	()	()	()	(478) 1
Education and training	()	()	()	()	()	(456) 4

Disciplinary process for violations	()	()	()	()	()	(214) 8
Special Government employee activities	()	()	()	()	()	(269) 7
Developing information technology applications for any aspect of the ethics program	()	()	()	()	()	(304) 6

Other (specify and indicate the amount of time spent using the time spent scale above) Table 6

22) Did your agency (e.g., ethics office, Inspector General, General Counsel) conduct a self-assessment to evaluate any aspect of the ethics program in 2013?*

() Yes **70 (51%)**

() No **66 (49%)**

What did you assess? Check all that apply.*

[] employee perceptions about the ethics program **28**

[] employee knowledge of the ethics rules **28**

[] employee perceptions about the agency's ethical culture **28**

[] compliance with applicable ethics laws and regulations **39**

[] employee knowledge before or after training **21**

[] employee satisfaction with training offered **30**

[] consistency, accuracy and timeliness of advice and counsel **32**

[] knowledge and skills of ethics officials **26**

[] Other (specify): **Table 7** * **21**

23) Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2013? Check all that apply.*

Training **63**

Mentoring **56**

Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **33**

Individual development plans **26**

Written standard operating procedures **48**

Knowledge library (Intranet, videos, shared drives) **46**

Competency/skills gap assessment **15**

Resources assessment (personnel and/or financial) **32**

None **2**

Other (specify): **Table 8** **8**

24) Does your agency use an electronic financial disclosure filing system?*

Yes 53 **(39%)**

No 83 **(61%)**

If yes, indicate your FY 2013 actual and FY 2014 projected costs for using the e-filing system.*

FY 2013 actual costs: **\$7,587,638.75**

FY 2014 projected costs: **\$7,039,218.25**

amount paid to a non-federal vendor in 2013: **\$889,390.25**

amount projected to be paid to a non-federal vendor in 2014: **\$614,379.25**

amount paid to a federal agency in 2013: **\$5,652,938.50**

amount projected to be paid to a federal agency in 2014: **\$5,906,645.00**

amount attributable to all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in 2013: **\$5,038,506.48**

amount projected to be attributable to all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in 2014: **\$5,037,432.65**

number of public financial disclosure filers who filed in electronically in 2013: **15,068**

number of public financial disclosure filers projected to file electronically in 2014: **14,647**

number of confidential financial disclosure filers who filed in electronically in 2013: **185,769**

number of confidential financial disclosure filers projected to file electronically in 2014: **189,608**

If yes, indicate which forms your agency uses the e-filing system for, check all that apply:

Public Financial Disclosure (OGE Form 278) **50**

Periodic Transaction (OGE Form 278-T) **26**

Confidential Disclosure Forms (OGE Form 450) **48**

25) Does your agency use an automated system to track the administration of the financial disclosure program? *

Yes 58 **(43%)**

No 78 **(57%)**

26) Do you receive timely notification of new entrant employees required to file financial disclosure reports?*

Yes 119 **(88%)**

No 17 **(13%)**

27) Do you have written procedures for financial disclosure, pursuant to 5 U.S.C. app 402(d)(1)?*

Yes 125 **(92%)**

No 11 **(8%)**

28) ...

29) ...

30) ...

Education and Training

31) Initial Ethics Orientation (IEO)*

Number of employees required to received IEO: **352,562**

Number of employees who received IEO (Of those required): **335,754**

32) Is initial ethics orientation part of your agency's in-processing process for new employees?*

Yes **131 (96%)**

No **5 (4%)**

33) How do you deliver initial ethics orientation to new employees? Check all that apply.*

Classroom instruction **81**

Instructor-led web-based **10**

Self-paced web-based **47**

Video **21**

Satellite broadcast/videoconference **11**

Other (specify): **Table 9 85**

34) Who developed the IEO training materials? Check all that apply.*

My agency **114**

OGE **59**

Other (specify): **Table 10 19**

35) Annual Ethics Training: (Include SGE filers)*

	Required	Received (Of those required)
Public filers (OGE Form 278) – PAS	759	669
Public filers (OGE Form 278) - non- PAS	22,134	20,984
Confidential filers (OGE Form 450)	328,899	319,063
Others (file alternative forms)	88,518	95,546
TOTAL	431,893	428,727

36) How do you deliver annual ethics training to employees required to receive training? Check all that apply.*

- Classroom instruction **96**
- Instructor-led web-based **14**
- Self-paced web-based **79**
- Video **33**
- Satellite broadcast/videoconference **22**
- Other (specify): ___ **Table 11** **51**

37) Who developed the annual training materials? Check all that apply.*

My agency **114**

OGE **38**

Other (specify): **Table 12 37**

38) Did you provide annual ethics training to other employees not required to receive training?*

Yes **103 (76%)**

No **33 (24%)**

39) Which group did you target for additional, specialized ethics training? Check all that apply.*

Contractors **17**

Procurement Officials **43**

Supervisors **39**

None **46**

Other (specify): **Table 13 68**

Advice and Counseling

40) Use the following scale to rate how frequently your agency provided opinions, advice, and counseling on the following topics*

	Not at all	Rarely	Periodically	Frequently	Very Frequently	Ranking 1 – Most Frequent
Outside employment/activities	()	()	()	()	()	(450) 2
Post-employment restrictions	()	()	()	()	()	(441) 3
Conflicting financial interests	()	()	()	()	()	(438) 5
Awards	()	()	()	()	()	(272) 8
Impartiality in performance of official duties	()	()	()	()	()	(403) 6
Misuse of position, Government resources and information	()	()	()	()	()	(381) 7
Travel, subsistence, and related expenses from non-Federal sources	()	()	()	()	()	(440) 4
Gift acceptance, excluding awards and travel, subsistence, and related expenses from non-Federal sources	()	()	()	()	()	(484) 1

Other (specify and indicate the amount of time spent using the time spent scale above) **Table 14**

41) How does your ethics program ensure that accurate, consistent and timely opinions, advice, and counseling are provided to employees? Check all that apply.*

Review written opinions **105**

Discuss opinions with staff before providing final decision **111**

Review ethics officials' phone logs **10**

Conduct periodic discussions with staff **94**

Other (specify): **Table 15** **53**

42) Are public filer employees provided a notice of available post-employment counseling when they file a notice of negotiation pursuant to the Stock Act?*

Yes **91 (67%)**

No **44 (33%)**

Enforcement of Standards of Conduct, Criminal, and Civil

43) Number of disciplinary actions taken based wholly or in part upon violations of the standards of conduct provisions (5 CFR part 2635) in 2013. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents.*

2,637

44) Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209 in 2013. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents.*

45

45) Number of referrals the ethics office made to the Office of Inspector General of potential violations of the criminal conflict of interest statutes in 2013*

117

46) Do you track referrals made to the Department of Justice that result in disciplinary actions or criminal prosecutions?*

() Yes **81 (60%)**

() No **54 (40%)**

47) Which office(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.*

DAEO/ADAE0 **87**

General Counsel **63**

Agency Head **14**

IG **45**

Other (specify): **Table 16** **6**

Public Financial Disclosure

48) OGE 278 Reports*

Nominee/New Entrant*

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶
Required	153	202	979	351	1,077
Filed	150	197	962	342	1,040

Annual*

	PAS⁴	Non- Career SES⁵	Career SES⁵	Schedule C	Other⁶
Required	669	816	10,342	1,114	7,818
Filed	669	799	10,282	1,108	7,682

Termination*

	PAS⁴	Non- Career SES⁵	Career SES⁵	Schedule C	Other⁶
Required	115	145	811	248	780
Filed	111	142	783	220	751

Combination^{3*}

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶
Required	72	36	168	36	144
Filed	71	36	166	37	143

Total*

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶
Required	1,009	1,199	12,301	1,749	9,823
Filed	1,001	1,173	12,193	1,707	9,620

49) OGE 278 Transaction Reports*

	PAS⁴	Non-Career SES⁵	Career SES⁵	Schedule C	Other⁶	Total
Filed	476	486	4,630	282	3,667	9,541

50) Does your agency have written procedures for following up with delinquent public financial disclosure (OGE Form 278) filers?*

() Yes **95 (71%)**

() No **40 (29%)**

51) Does your agency require an intermediate review by someone other than an ethics official for public financial disclosure (OGE Form 278) reports?*

() Yes **32 (24%)**

() No **104 (76%)**

52) Annual and termination reports:*

	Granted filing extension	Granted waivers of late filing fee	Paid late filing fee
Number of OGE 278 filers	2,997	103	54 \$10,800

53) Transaction reports:*

	With filing extension	With waivers of late filing fee	Paid late filing fee
Number of OGE Form 278 T Reports	403	61	7

54) Number of public financial disclosure filers reported to the Attorney General for willful nonfiling:*

2

55) Number of public financial disclosure (OGE Form 278) filers who took specific corrective or remedial actions because of information on the annual report (e.g., divestiture, resignation from outside position, written disqualification, reassignment, etc.) in 2013: *

232

56) Corrective actions taken OGE Form 278 annual [reports](#)*

	Recusals	Divestitures	Resignations from outside positions	Reassignments	Don't know/don't track
					Yes*
Number of corrective actions taken OGE Form 278 annual reports:	182	50	5	4	21

57) Number of public financial disclosure ([OGE Form 278](#)) filers who took specific corrective or remedial actions because of information on [transaction reports](#) (e.g., divestiture, resignation from outside position, written disqualification, reassignment, etc.) in 2013: *

25

58) Corrective actions taken on OGE Form 278-T transaction [reports](#).*

	Recusals	Divestitures	Reassignments	Don't know/don't track
				Yes*
Number of corrective actions taken on OGE Form 278-T transaction reports:	13	7	0	22

59) Number of individual public financial disclosure reports (OGE Form 278) requested to be released in 2013.

446

Confidential Financial Disclosure

60) Statistics on Confidential Financial Disclosure Reports (excluding SGEs):*

	Required to File	Filed
OGE Form 450	321,065	290,776
OGE Form 450A	25,799	50,828
OGE-approved alternative form)	14,871	16,549
TOTAL	361,753	358,153

61) Does your agency have written procedures for following up with delinquent confidential financial disclosure (OGE Form 450) filers?*

- () Yes **98 (72%)**
- () No **38 (28%)**

Advisory Committees/Special Government Employees

62) Number of advisory committees (do not include Federal Advisory Committees (FACA))*

206

63) Number of advisory committee members (do not include FACA members)*

2,631

64) Does your agency provide ethics program services for any boards or commissions that are independent of your agency?*

() Yes **13 (10%)**

() No **112 (90%)**

65) Statistics on financial disclosure reports filed by SGEs**

	Confidential Reports (OGE Form 450) REQUIRED	Confidential Reports (OGE Form 450) FILED	Public Reports (OGE Form 278) REQUIRED	Public Reports (OGE Form 278) FILED
Advisory Committee Members (FACA)	7,376	7,084	20	18
Advisory Committee Members (non-FACA)	165	155	0	0
Experts/Consultants	472	455	43	31
Board Members	331	313	44	37
Commissioners	117	107	11	11
Other (specify):	1,906	1,823	198	192
TOTAL	10,367	9,937	317	290

67) Number of SGE filers who took specific corrective or remedial actions (e.g., divestiture, resignation from outside position, written disqualification, reassignment, etc.) in 2013*

481

68) Does your agency have written policies or procedures for designating SGE status?*

Yes 39 **(29%)**

No 41 **(30%)**

Not applicable **56 (41%)**

Appendix – Comments

5) Which office at your agency makes a determination that an individual is a special government employee?* 6) If that office is not the ethics office, what is the role of the ethics office in that determination?

Table 1

Office of General Counsel	General Counsel is the DAEO.
N/A	Whether someone is an SGE is tied to the position to which they are appointed. Appointments are made either by the ACUS Chairman and Council, or the White House (depending on the position to which they are being appointed). If someone is appointed to serve as a non-government member of ACUS, then they automatically become an SGE.
Office of General Counsel	There is no ethics office per se. The associate general counsel (the only attorney in the office of general counsel) is also the designated agency ethics official.
Ethics/Office of General Counsel	
GC/EA in collaboration with HR	
N/A	
Ethics Office	
Designated Agency Ethics Official	
Designated Agency Ethics Official	N/A
Executive Director	Because the Arctic Research Commission is so small, there is no ethics office.
AFRH General Counsel's Office	The General Counsel also serves as the Designated Agency Ethics Official for AFRH.
Ethics	
Executive Office of the President	Assures compliance w/appt regulations/conflicts of interest
Office of the General Counsel (DAEO)	
Ethics Office	
none	
none (determined by OGE)	None
n/a	
Human Resources	All Commissioners and State Advisory Committee members are part-time, so the determination is easy and does not require the DAEO or ADAEOs involvement.
DAEO	

Office of Human Resources	If an SGE is onboarded, then the Office of Human Resources coordinates with the ethics program to ensure that the SGE is properly identified and that they file appropriate financial disclosure and receive ethics training.
The Office of Human Capital in consultation with the Ethics Office	The Office of Human Capital consults with the Ethics Office
Office of General Counsel (ethics officials)	
Ethics Program- OGC	
Finance and Administration	The agency does not have any SGEs.
DAEO (in consultation with General Counsel and Chief of Staff)	N/A
Human Resources	Decision would be reviewed by the Office of General Counsel, responsible for ethics issues. We do not have this type of employee.
Not Applicable	Not Applicable
General Counsel	N/A
N/A	
MPS	Advisor
Office of the General Counsel Ethics Attorneys	
Office of General Counsel	N/A
HR	HR will usually consult with the ethics office /the office of General Counsel on such matters
The DSS Human Capital Management Office (HCMO)	The determination is made by DSS HCMO in close coordination with the agency's ethics office.
OGC and HR	Ethics Office is in Office of the General Counsel
DAEO	
Human Resources	The Office of Ethics provides consultation and assistance to Human Resources employees making determinations relating to the status of individuals as special government employees.
Office of Human Resources Management	For Federal advisory committees, the ethics office provides guidance on how to classify members.
Human Capital Advisory Services	The Ethics Office (OGC) provides advisory services.
Human resources with the assistance of ethics officials	Ethics officials educate HR on what is a SGE and provide assistance as necessary.
Ethics	
Asst. General Counsel for General Law and Office of Human Capital	
Each component makes a determination in legal consultation with the Office of the General Counsel (“OGC”).	Consultative.
Please see individual Component reports.	
Office of the Chief Human Capital	The ethics office reviews the employment agreement and consults on

Officer, Executive Resources Division	filing status before SGE start date. We also provide training to SGE's.
Ethics Office and Human Resources	
Human Resources	Human Resources consults with the Ethics Division
Each bureau	The ethics office ensures the bureaus use proper guidance in determining filers. The ethics office reviews and certifies financial disclosure reports of SGE's and answer any questions about SGE status.
Ethics Office	n/a
Personnel Office in coordination with Ethics Counsel	Advisory
Human Resources	The Departmental Ethics Office provides ethic written ethics rules and the OGE 450 to the Executive Secretariat's Office to be reviewed and completed by the SGE's prior to the first board or committee meeting.
Ethics Counselor	n/a
Ethics Office & HR works together	
HR, and/or Office of General Counsel or Chief Counsel	
HR, with OGC consultation if necessary	To provide guidance as necessary
N/A	N/A
OGC	
Office of Legal Counsel	
Office of the General Counsel	N/A
Office of Management Services, CHCO	The DAEO informs the CHCO of the definition of an SGE and the CHCO then makes the determination.
Office of Management Services, CHCO	The DAEO informs the CHCO of the definition of an SGE and the CHCO makes the determination.
OGC/Ethics	N/A
Human Resources	Advisor
Staff Director and Personnel Committee	The Ethics Office does not have a role in that determination.
Office of the Executive Director	
n/a	
The Office of the Solicitor, which includes the DAEIO and Alternate DAEO	N/A
N/A	
Human Resources/Ethics	Co-determination
Office of General Counsel	The ethics officers are also in the Office of General Counsel (OGC). The ethics officers in OGC make the determination of whether an individual

	is an SGE.
Ethics Office	
Office of General Counsel (OGC)	
Office of the General Counsel (Ethics Team)	N/A
Office of General Counsel, Ethics Law Staff and Office of Human Resources Management	
Ethics office	
Office of General Counsel	N/A
OGC	N/A
Human Capital Office	Assists Human Capital Officer
State Department/ IJC HQ	Ethics Office will be consulted by State Depart. HR
Chairman to HR to OPM	None
n/a	n/a
Done by Public Law	
General Counsel/DAEO	
Financial and Administrative Management	We would be notified via email. The Board does not hire SGEs.
The Chairman	The Chairman made the determinations in consultation with the DAEO.
Ethics Office	
Set by statute	None. Set by statute
Human Resources and the Office of International and Interagency Relations, in consultation with OGC	Provides legal counsel.
DAEO, Ethics Office	
General Counsel	The General Counsel is the DAEO.
Not applicable	We have never had Special Government Employees
Office of the General Counsel	The Office of the General Counsel also functions as the ethics office at the NEA.
The Office of General Counsel (OGC) in consultation with the Office of Human Resources.	OGC is the ethics office for NEH.
NA	We advise on the issue
Human Resources	
Office of Legal Affairs	Both Ethics Officers are in the Office of Legal Affairs

HRM/OGC	
Office of General Counsel, Administrative Law & Ethics (A&E)	n/a
Legal in coordination with Resource Management	N/A
Human Resources Division (AD-30)	Human Resources Division will consult with Ethics staff
Office of the Chief Human Capital Officer	Advisory role and makes determinations with respect to conflict-of-interest matters, financial holdings, and ethics-related matters.
Ethics	
N/A	N/A
n/a	n/a
Office of General Counsel	
Office of Administration Human Resources Management Division	OMB OGC is office responsible for ethics at OMB. OMB Admin calls upon OMB OGC to provide ethics advice to SGEs.
Office of Legal Counsel	
n/a	
Office of Personnel with Office of General Counsel Input	Guidance, Oversight
DAEO	
N/A	N/A
Ethics Office	
General Counsel (Ethics)	
OVP Counsel's Office	N/A
DAEO	
The 4 SGEs are designated by statute. No others not statutorily	
General Counsel - Ethics Officials	The Ethics Office is housed in the Office of the General Counsel.
Office of the General Counsel	
N/A	
General Counsel	Consultation
Office of General Counsel	
Ethics office	n/a
Ethics Office	
Ethics Office	
HR	None

The Office of Personnel and The Office of the General Counsel	N/A
Ethics Office	NA
Office of Managing Director, Section of Human Resources	The ethics office is not involved in determining whether an employee is an SGE. It is involved, however, in determining whether that employee must file a financial disclosure form, and it conducts ethics training for all employees (including SGEs).
DAEO/Office of the General Counsel	
CHR	Review of determination
Ethics Office	
Administrative Office and the Office of the General Counsel	
N/A	Our SGEs are presidential appointees
Office of the White House Counsel	General Counsel is the DAEO.

7) With respect to SGE's who serve as members of a board or committee, is ethics training provided to SGE's prior to attendance at their first committee or board meeting?*

Table 2

Office of General Counsel
General Counsel/DAEO
Office of General Counsel (see answer to question #6)
Ethics/Office of General Counsel
Ethics Office
Ethics Office
General Counsel's Office
BGSF
Office of the General Counsel (Ethics Office)
Ethics - CSB has no SGE's
printed material
Commission consultant
The DAEO/ADAEO is responsible for preparing ethics training material for SAC members. The Regional Directors serve as deputy DAEOs and are responsible for State Advisory Committee members ethics training.

DAEO
Office of General Counsel
DAEO - but no SGEs, so Not Applicable
General Counsel
DIA Office of the General Counsel Ethics Attorneys
N/A, no SGEs on the Board currently
DoD OGC
DAEO
The Office of Ethics provides the training via an online course module.
Ethics Law and Programs Division
Ethics officials provide the guidance and training
Ethics
Office of General Counsel for General Law
OGC Ethics Division, agency component ethics office, and committee management staff with materials that OGC Ethics provided.
The ethics office.
DEO and DDAEOs
SOL
The ethics office provides written material prior to coming on board and being cleared for membership. Each filer is required to sign and date they have completed reading the "Ethics Guidance".
Ethics Office
Ethics Counsel
Ethics Counselor
Ethics Office
OGC (Ethics); Director, Art Appraisal Services; Office of Chief Counsel
OGC Ethics Specialty Team
the office that is responsible for the SGE
Ethics Staff, if we ever had any SGEs.
Ethics Staff, if FCSIC ever had any SGEs.
OGC
Office of the General Counsel, General and Administrative Law Section
Office of the Solicitor
General Counsel
Ethics Office

OGC
Office of General Counsel, Ethics Law Staff
Ethics Office
Office of General Counsel/Program Officers
OGC
N/A
Main office
General Counsel/DAEO
Office of the General Counsel
Ethics Office
OGC
Ethics Office
General Counsel/DAEO
Office of the General Counsel
OGC
General Counsel Administrative Law (all new employees take the training)
DAEO
Program Office/OGC/Written
A&E
We have not had an SGE for a long time, if ever. If we did have one, he/she would be required to take the agency's on-line new employee ethics training module, plus likely be briefed individually by DAEO and hiring office about role of agency employee serving officially on committees.
Office of the General Counsel Deputy DAEOs
Ethics
OMB OGC
Ethics
Office of General Counsel
OSTP
Ethics Office
Ethics
OVP Counsel's Office
DAEO

DAEO
Office of the General Counsel
Ethics office
NA we have no SGEs that serve on boards or committees
The Office fo the General Counsel
Ethics Office
The Board's ethics office.
DAEO/Office of the General Counsel
OGC
Ethics Office
USTDA did not have any SGEs in the reporting period. If USTDA has any SGEs, the Office of the General Counsel will provide the ethics training to the SGEs.
VEF Ethics Office (DAEO or ADAEO)
White House Office does not have SGE's who serve as members of a board or committee

15) If ethics program management has been delegated, indicate which elements have been delegated outside of the agency’s central ethics office. Check all that apply.*

Table 3

By MOU with FAA for legal services
OGC Ethics Division (main ethics office) supervises and manages all of the above matters.
DDAEOs manage the functions of the ethics programs within their component; The Departmental Ethics Office (DEO) oversees the overall DOJ ethics program.
Foreign Service Institute - online ethics training
Non-Federal travel assistance and WAG approvals
Each operating administration and OST manages its own ethics program with oversight from the DAEO.
Main Treasury manages all aspects for its program; bureaus manage their own program but report to Main Treasury (DO)
Outside employment approvals and disapprovals
Ethics Training
DAEO/Office of the General Counsel provides governance and oversight of the ethics program. Ethics and Employee Concerns is responsible for program administration including day-to-day activities, advice and counsel, and financial disclosure reporting.

17) Indicate the training provided to ethics officials to assist them in carrying out their ethics duties. Check all that apply.*

Table 4

4-day structured course at the Army JAG school
Ethics official detail to OGE
Reading materials from web and other agencies
Attended Interagency Ethics Council (IEC) meetings/training sessions
Training provided by departing DAEO
Written training provided by DoD Standards of Conduct Office
Office of the Judge Advocate General Ethics Counselor Course
Training provided by the U.S. Army Judge Advocate General's Legal Center and School
Computer-Based Training
Post employment brownbag lunches, 450 Review Course for FDA Supervisors, Initial Ethics for FDA Managers; Quarterly Meetings, and Annual Workshop conducted by OGC Ethics Division.
Brown-bag ethics lunches for ethics officials twice per month, ethics team meetings, mentoring, issue specific training, IEC meetings.
FD On-line implementation
Ethics Conference, D.C. Bar Course
Ethics Conference, D.C. Bar Course
IEC Meetings
IEC
Ethics training materials acquired from other federal agencies.
Attendance at IEC meetings and DoD Coordination Group meetings
Training provided by GSA
Agency annual ethics training
OGE webinars (no in-person OGE ethics training); attendance at Interagency Ethics Council monthly meetings
Bar CLE
Inter-agency ethics counsel meetings and on-the-job training
Share point site

18) If so, did you find OGE’s recommendations helpful?

Table 5

While making no formal recommendations for improvement, OGE’s Program Review gave us the opportunity to assess our progress in meeting the objectives and regulatory requirements established by OGE for the program as well as in meeting our goal to create a model ethics program. We were able to note opportunities for further progress in and development of our program, as well as recognize areas in which we are in compliance.
The 2012 OGE Program Review and the 2013 follow up review letter both were very helpful in evaluating USDA's ethics program.
We appreciated the review of our program and the recognition of our efforts to create an ethical culture.
Very helpful. We have been working to improve our program and make sure it is up to a high standard. Thus we found the recommendation and 3 additional suggestions made by OGE in its report very helpful. We have completed 2 of the 3 suggestions and have nearly completed the recommendation and are working on the final suggestion.

21) Other (specify and indicate the amount of time spent using the time spent scale above)

Table 6

STOCK Act compliance - very significant amount. Travel under 31 USC 1353 - moderate amount. Agency gift acceptance - moderate amount. Reporting to OGE - moderate amount.
Internal documents clearance for ethics issues = Very Significant Amount of Time
Hatch Act (moderate amount of time) Emoluments Clause (limited amount of time)
This year, we developed training on our role as an arm's length regulator. Every employee was required to take the on-line course, which focused on avoiding the appearance of a conflict of interest. We spent a significant amount of time developing the course with a workgroup from various offices within the Agency.
This year, we developed training on our role as an arm's length regulator. Every employee was required to take the on-line course, which focused on avoiding the appearance of a conflict of interest. We spend a significant amount of time developing the course with a workgroup from various offices within FCA.
Given that the MCRMC is a new, temporary agency that had little staff until Fall of 2013, the most significant ethics activities have been providing initial ethics orientation training for all Commissioners and staff, assisting the Commissioners with their financial disclosure obligations, and initial counseling questions.
We also spend a moderate amount of time giving post government employment advice to employees.
Moderate amount of time on special projects relating to: (a) tracking official committee memberships, and evolving agency policy on role of agency representative on committees, on what committees agency representatives can serve, and differentiating between official committee membership and membership as an outside activity; (b) intellectual property issues/releases relating to employees' official appearances and written works; and (c) limitation on employees' ethics disclosures to outside organizations in connection with participating in an event on behalf of the agency.
Due to high turnover rates, a very significant amount of time is spent by the DAEO on nomination- and confirmation-related preparatory work, both vetting, conflicts counseling, OGE preclearance, hearing preparation. Similarly, high turnover rates lead the DAEO to spend a very significant amount of time on post-employment counseling, frequently after (not uncommonly long after) senior staff departures.

The ethics office commonly talks to other offices and employees and always makes sure that employees know to contact us before they take any actions that might involve ethics laws. We spend the most time with reviewing financial disclosure reports and providing advice and counsel. In 2012 and 2013, the ethics office considered some new IT for financial disclosure, but determined that it was not cost effective.

22) What did you assess? Check all that apply.*

Table 7

Program review
278 Filer compliance with timely filing or requests for extensions
automated filing of financial disclosures through FDM
Every email sent by OE staff contains a request for USDA employees to submit an electronic survey to provide feedback and comments. OE utilizes the surveys to assess the timeliness, accuracy, and other qualities of the ethics advice provided. Each completed survey is viewed by the DAEO and ADAEO.
Field audits
to identify: best practices or deficiencies; opportunities for improvement; review of SGE processes and financial disclosure filers.
One component assessed responsiveness and guidance of ethics officials via a survey; one component assessed the best allocation of ethics resources
Conducted assessment of Ethics Training for senior leaders.
Program management
Ethics Office Administration and Financial Disclosure
prepared and updated a tactical plan for the ethics program—tactical plan assessed the program; conducted an internal program review; consistency of ethics advice; consistency, accuracy, and timeliness of advice and counsel; knowledge and skills of ethics officials
Ethics outreach; liaison with OGE and Federal Ethics Community
Ethics outreach; liaison with OGE and Federal Ethics Community
Agency compliance with applicable GAO standards for Internal Control requirements
OMB Cir A-123 Internal Control Audit
Collection of financial disclosure reports.
One Center reviewed reimbursable travel and the ethics process for astronaut appearances.
assess compliance with training requirements
Undertaking self-inspection of entire program
Review of outside speaking and attendance request, including offers of gifts associated with such events.
Financial Disclosure Program

23) Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2013? Check all that apply.*

Table 8

DAEO and ADAEO coordinate issues to ensure continuity of operations
Identified a new attorney to assume role as ADAEO and she attended the OGE Intensive Curriculum in Ethics.
assignment of management responsibilities
We hold internal Office of General Counsel (OGC) ethics meetings and discuss ethics issues at OGC staff meetings. We attend DoD Standard of Conduct Office (SOCO) meetings, DoD Financial Disclosure Management (FDM) electronic filing system meetings, and Quarterly DAEO meetings with the OGE Director.
Use of internal website to dispense up-to-date ethics information, internal review; surveys; and risk management activities.
Written materials provided to ethics officials.
Assignment of primary and secondary personnel for each program area.
We expect to have new hires during this fiscal year who will be trained in clerical and substantive ethics work with the view that they will maintain the ethics program upon the expected retirement of the ADAEO.

33) How do you deliver initial ethics orientation to new employees? Check all that apply.*

Table 9

Written materials and in-person follow-up as needed
See "additional comments," below.
HR provides the Standards of Conduct to each new employee upon entrance on duty.
PowerPoint Presentation and Talking Paper
one-on-one during in-processing
personal discussion augmented with written and web-based materials
one-to-one meeting, ethics handouts
Written materials
Face-to-face discussions; review of written materials
Individual briefings, written material from OGE, verbal communication w/OGE as appropriate/required
telephone and in-office training
Written material
one-on-one
one-on-one, as needed for a micro-agency.

As necessary (very small agency ~ 26 FTEs)
In-person training provided upon request of employee.
Written materials are also provided in the offer letter and an additional PowerPoint training is sent once they are onboard.
documents available via share drive, one-on-one counseling
written materials
Written materials complying with the requirements of 5 C.F.R. § 2638.703 are provided to all new employees at sites without qualified ethics instructors.
One-On-One in-person training
Distribution of written materials
Written ethics training is provided via email at entry on duty.
one-on-one briefing
written documents
Written material
written materials
We conduct one on one training for all new 278 filers and for any high level IPA or SGE employees
Written materials in rare instances involving remote field personnel; in-person meetings/briefings with certain new officials; if an employee is unable to attend live IEO within 90 days, they are provided written materials to review after which they confirm understanding and/or discuss the materials with ethics officials.
Include the DOL pamphlet in the entry package
Some PAS employees received one on one training once they became Department of State employees.
Written Materials
Upon entering position with the Department, all employees are provided an ethics guide which contains the Departmental Ethics Office contact information.
Written materials
Written materials provided for review, web-based and one-on-one training.
1:1 for PAS and other senior positions; creation of long-distance learning site Ethicsburg.com available 24/7 online; distribution of written materials; ethics information and handouts in electronic form;
one-on-one discussions with senior officials
Distribution of written materials
all new employees receive in person initial ethics orientation.
Provide copies of the Standards of Conduct for Executive Branch Employees and a booklet, "Do It Right," published by OGE
Consistent with 5 CFR 2638.703(a)(2), new employees are given a summary of the Standards of Ethical Conduct for Employees of the Executive Branch, Principles of Ethical Conduct, and contact information for the agency DAEO. Employees are given at least one hour of official duty time in which to review the Standards of Conduct, either in hard copy or via the agency intranet. Employees are given 90 days within which to complete their review, and they sign and date an acknowledgment form.
Individual briefings
Written materials

One-on-one training
FTC Ethics Pocket Guide
One-on-one training
Individual meeting with written materials provided.
Self-paced written ethics materials.
one on one
Self-Study
Through our contract with DOI via IBC
Executive Director provides training.
Face to face
one-on-one briefings; handouts
New employees are given a website containing the required initial training materials. Standards of Conduct and written materials are given to employees.
New hires are given a copy of the Standards of Ethical Conduct of the Executive Branch on their initial date of entry; sign a Certification of Receipt of the Standards of Ethical Conduct; and receive one hour of duty time to review. New hires are also introduced to the DAEO on their date of entry.
distribution of ethics binder; link to intra-net ethics site
in-person training
In person ethics orientation meeting (one on one or small group) with the ADAEO and other ethics staff.
in person orientation with DAEO
briefing at orientation with additional handouts depending on type of employee
Both small group (usually 3-4 persons) and one-on-one meetings with legal staff
Written materials are also provided.
one-on-one with new employee or by telephone with regional office employees
Provide copy of OGE's Standards of Ethical Conduct booklet.
One-on-one briefings and written materials
Individual meeting with DAEO
New employees are given information to review and time to do so; they must certify that they will comply with the Standards of Conduct.
Handouts
We provide a one-on-one initial ethics orientation for each new employee and a follow-up email with key policies attached.
One-on-one in person.
one-one-one
Written materials.

One-on-one instruction if the employee misses IEO
Written material, reference to web-based OGE training
They are given written ethics materials and official time to review them.
and/or Ethics materials review and in-person discussion
Ethics Handbook
Provide OGE written training material/pamphlets
One on one training for senior level employees
In-person instruction during employees first day. Materials are provided, and an ethics officer follows up.
New officers receive one-on-one instruction
Standards of Ethical Conduct - paper copy
USTDA provides hardcopies of ethics training materials to each new employee to study at his/her own pace.
Written materials and one-on-one guidance where appropriate

34) Who developed the IEO training materials? Check all that apply.*

Table 10

DoD SOCO
DOI Personnel Office (BSEE)
DoD Standards of Conduct Office
OGE website materials modified
Foreign Service Institute
DoD SOCO
contractor; Hatch Act materials by OSC
IEO web-based training developed bySkillSoft.
Farm Credit Administration
Dept. of Agriculture
The OSC pamphlet on political activity.
Through our contract with DOI via IBC
other federal agencies
Agency staff worked with an outside contractor several years ago to develop a web-based training module.
We have adapted web-based instruction prepared by the Environmental Protection Agency, which as a significant capability in this area. We have done this for many years and are very thankful for their cooperation and consideration.

EOP-wide in-processing involves standardized ethics training for all new staff, which is then augmented in the majority of cases - and in every case of a 278 filer - by additional contact w/OMB OGC regarding the 278 and any related conflicts or appearance concerns
USDA ethics office
EOP Office of Administration
Standards of Conduct Office - DOD

36) How do you deliver annual ethics training to employees required to receive training? Check all that apply.*

Table 11

A memo to SGEs briefing them on the rules on impartiality.
Quizzes, Regional Legal Advisor outlines, slide presentations.
email and PowerPoint Presentation
Annual training is held when all employees will be in DC office. Training is approximately 90 minutes with handouts and Q&A session.
Written materials
Review of powerpoint slides provided by DoD SOCO, face-to-face discussions.
Individual Contact; 2-person micro-agency
Personal conversations and meetings
Written material
Commission meetings
one-on-one, as needed for a micro-agency.
Individual briefings and distribution of written materials
In writing for SGEs when in person is impracticable.
documents available on share drive, one-on-one counseling
Live leader-led presentation
written materials
certain officials receive one on one meetings and briefings.
CY 2013 DOL pamphlet (written material)
More senior level Department of State employees who requested one on one training will receive it. We provide a video to Department of State employees who are detailed to any organization that does not provide ethics training.
Written materials
One on one training

One on One
Written materials and web-based.
creation of long-distance learning site Ethicsburg.com available 24/7 online; audio conferences with web-based materials for review;
in-person
In-person training with small group
supplemental written materials including the 14 principles, selected statutes, and the agency's supplemental ethics regulations
individual instruction
One-on-one training.
One-on-one sessions
Individual counseling.
In-person briefs(supplements with self-paced written ethics materials) and SharePoint/On-line Resources.
Review of written materials and web based with ethics advisor available to public filers if there are questions.
Through our contract with DOI via IBC
Executive Director briefing
We provided IEO training.
Center developed handout.
Materials and links on intra-net site.
quizzes, online training
articles sent via email
Written materials are also provided.
Educational ethics issue forums
Written Training Materials prepared by OMB OGC
conference calls, individual briefings
one on one
Reading requirements
A limited number of confidential filers who missed the in-person classroom training were provided with the Board's Ethics Guide and an opportunity to review the same. As always, ethics officials at the Board were available to answer questions.
email training course containing OGE material
Written material
In certain situations we provide one-on-one training.

37) Who developed the annual training materials? Check all that apply.*

Table 12

FEMA
USDA online modules
DOD
DoD SOCO
The 2013 annual ethics training included original Commission material and incorporated ethics training materials from OGE and the Department of Defense.
Ethicsburg web-based training offered by Bureau of Financial Services, Department of the Treasury.
White House Counsel's Office
DoD Standards of Conduct Office
Skillport, a private company that provides e-learning training for federal government departments and agencies. All employees were required to take the e-learning module entitled "Government Ethics" for the 2013 annual training.
OGC Ethics Division
Foreign Service Institute
DoD SOCO
Our DAEO, at that time, used materials from another agency. They supplied us the link and we went through the course.
Department of Agriculture
Farm Credit Administration
web-based training developed by the Department of Agriculture
Online training module "Ethics Sweepstakes," provided by USDA.
Department of Commerce
Training Games Inc. (TGI)
USDA
Department of State
Department of Agriculture
USDA Training Modules
DOI via IBC
EPA
We provided IEO training.

Other federal agency self-paced, web-based training modules
USAID assisted the NLRB in developing a values based training program that USAID presented on June 12 (two sessions) to Headquarters staff. Another six sessions were presented by NLRB ethics staff during the months of November and December.
other agency's presentation modified to fit our needs
White House Counsel's Office
Again, with the support of EPA, which is very much appreciated
U.S. Department of Justice
USDA ethics office
Invited guest speaker – an ethics official from another Federal agency.
USDA Ethics Office
White House Counsel's Office
Utilized training framework from another federal agency.
FEMA

39) Which group did you target for additional, specialized ethics training? Check all that apply.*

Table 13

Offered web based training to all employees.
Representatives of partner organizations
CSB staff and Board: General ethics advice:
All Headquarters full-time career employees
All personnel (very small agency ~ 26 FTEs)
Provided training to the Office of Technology & Innovation; Division of Research, Markets, and Regulations on the External Event Approval Process; the Director's Financial Analyst Fellows on post-employment restrictions.
We provided our Commissioners additional 1-on-1 ethics training.
Grant program officers
All CEQ staff (permanent and temporary) must receive ethics training
All employees are required to receive annual training.
Agency employees in high-trust positions
Public Affairs, International Engagement, and Innovation Office. These offices deal often with non-federal entities in the course of their official duties.
Contracting Officer Representatives and Government Purchase Card authorized users.
All employees at the Board have been directed to take the training.

Human Resources Specialists and Science Research Leaders
NIST Employees in Boulder, Colorado, First Net Board Members; ITA locally engaged staff
Auditors and special agents.
We welcome and encourage participation of anyone in ethics training. In particular this year, we asked management to consider inclusion of all personnel for refresher ethics training. This in particular emphasized select personnel who management identified, and senior official support staff. Also, Combatant Commands have, at the direction of the Chairman of the Joint Chiefs of Staff, received enhanced, values-based ethical decision making training.
Grant Specialists, Grant Officers, Senior Staff, Supervisory Administrative Law Judges, Administrative Appeals Judges, IPAs, Fellows, and Interns
We encourage non-filers to attend annual training events and the webcast is available to all employees.
Almost all attorneys at DOJ are required to receive professionalism training annually, a component of which is government ethics training. Certain components require all of their employees to receive ethics training annually, not just financial disclosure filers. In addition, targeted ethics training was delivered to Finance Staff, Human Resources, interns, legal attache's working overseas, and resident legal advisors. Post-government ethics training was provided at retirement seminars and in employee exit briefings.
lawyers in SOL; investigators in EBSA and WHD
Senior Employee Aides, Executives and Assistants, Spouses of General Officers
Senior Leader Support Staff
Prospective retirees
Flag officer staffs
Employees not required to attend annual ethics training, officials with grant authority.
Some non-filers attended Ethics Q & As that were held on various topics (e.g., financial conflicts, impartiality, gifts, outside activities and post-employment) in 2013. Post-employment briefings were provided to all departing public filers and most GS filers; all departing employees receive post-employment guidance via email. Specific training on 18 U.S.C. § 208, impartiality, seeking and negotiating for employment, gifts, and post-employment was provided to several offices in DO in 2013; at one bureau, employees on board during the summer and early fall of 2013 (4009 in total) received ethics training. Also, one bureau provided targeted training for new managers and administrative professionals; at least two bureaus train all employees regardless of filing status.
Researchers, advisory committee SGEs, new supervisors, VA employees working with contractors, OGC attorneys, and VA-affiliated non-profit corporations
SES and senior leadership, political staff, DEOs, people thinking about leaving federal service
Employees whom their office directors designated for training.
Members of the Board of Directors
Student interns
Outstationed examiners received specialized training.
All employees
All non-filers
IPAs, FACA members, Industry Specialists
All staff

IMLS Program Officers and Research Staff
All employees were trained in 2013.
Non-filer employees
Commissioners
Scientists, all civil servants at a center heavily impacted by increased commercial engagement, and interns. One Center offered a special session on periodic transaction reporting for public filers, and from mid-2013 on, all public filers received monthly reminders on periodic reporting to increase understanding of that new requirement. One Center ethics attorney made a speech to a local business roundtable on civil service ethics requirements.
IT staff, administrative officers, and education specialists
Technicians not required to be trained
In 2013, 6 members of the National Council on the Arts received initial in-person ethics training when they were appointed to the Council. All Council members also receive annual ethics training. Additionally, members of the PCAH received ethics training during 2013.
Division directors, program staff and SGEs
Purchase Card Holders are no longer required to attend an annual ethics briefing since they are considered purchasing agents, but they are required to complete ethics training bi-annually. Additionally, we offered a Values Based Ethics training session to all NLRB employees.
Contracting Officers, Program Officers, Fellows, Senior Leadership, Division Trng, OIG, International
SGE
An administrative law judge; selected retiring employees
Our advisory committee members and administrative judges.
Special Government Employees
All agency personnel
IT, Human Resources, Support Staff
In 2013, OMB provided verbal ethics training to all of its employees, including contractors and detailees and interns who wanted to attend
SF 278 filers received updated Stock Act compliance training
All general counsel attorneys, all ODNI Chiefs of Staff, and all newly hired or detailed employees to ODNI
Political Appointees
Provided training to any OVP employee granted access to Twitter and similar social media accounts.
Executive Assistants, HR Team, External Affairs Team, Procurement group, EEO
all employees in the agency got trained on our supplemental regulations
Office of International Trade
We did not target a specific group of however, we encouraged all employees to view the training.
Officers and Executives (OGE Form 278 filers)
All Ethics Officials

40) Other (specify and indicate the amount of time spent using the time spent scale above) Table 14

On occasion with the situation presents itself, 25 percent.
Credit Restrictions – 3; External Events – 5; CFPB Ethics Regulations – 4
Not Applicable.
Hatch Act - periodically. Ethics Pledge - frequently. FGDA - frequently. Agency gift acceptance - frequently.
Internal clearance for documents on ethics issues, in particular conference MOUs and Co-sponsorship MOUs=Very Frequently
Hatch Act—3;
Hatch Act (periodically) Emoluments Clause (periodically)
Arm's length, appearance issues: Frequently
Arm's length, appearance issues, periodically.
N/A
Prohibited Holdings -- (4) Frequently Seeking employments -- (4) Frequently
80% Gifts 5% Outside employment 5% PEBs 10% others
Hatch Act - Periodically Stock Act - Periodically Speaking Engagements - Frequently
We also address issues arising from service as official participants in committee assignments, and are continuing to develop policies in this area. We also, on a periodic basis, give advice relating to the Hatch Act.
We also frequently provide advice concerning seeking employment, optics/appearance concerns in all categories, and the Hatch Act/political activity.
Seeking employment, Stock Act compliance, Hatch Act - periodically
Ethics Pledge-4
our supplemental regulations - 5
The Board does not have gift acceptance authority from Congress. We also do not accept expenses from non-Federal sources.

41) How does your ethics program ensure that accurate, consistent and timely opinions, advice, and counseling are provided to employees? Check all that apply.*

Table 15

Only the DAEO and, in his absence, the ADAEO, provide opinions, advice, and counseling. The few occasions when ADAEO provides such advice, she discusses this with DAEO.
offer training to staff, maintain GC SharePoint
Handle issues immediately when received
DAEO and ADAEO talk daily.
Major issues discussed with OGE desk officer
2 person staff
Provided directly to Members
Review information and guidance from OGE
Weekly meetings with the DAEO and ADAEO attended by all Ethics
Maintain a shared drive where advice can be reviewed or consulted
Consult with other ethics officials
one-on-one counseling
Use of common opinion formats and internal electronic advice databases.
We maintain copies of ethics opinions so all ethics counselors may reference them for consistency and accuracy.
weekly meetings with staff attorneys
Review of responses in ethics shared mailbox
Consistency in the staffing of ethics counselors, and consulting with DEO.
Review national office files for advice. Review and advise on emails from the regional offices
Maintain shared database of opinions.
Continuing education requirement for Ethics Counselors
The DAEO holds quarterly meetings with DEOs; the ADAEO holds monthly meetings with ethics officials.
DAEO approves all written 208(b)(1) waivers, per written office policy; discussions during quarterly conference calls with ethics staff
Request official legal opinion from Ethics attorneys. Then provide the information to the requestor.
monthly conference calls with regional and HQ ethics officials
document correspondence in Ethics email inbox
Ethics officials are copied on all correspondence.

Maintain a database for all inquires
Consult with OGE desk officer.
Quarterly conference calls
Research and discussion with Chief Counsel
Discuss with OGE staff
occasionally seek guidance from OGE Desk officer and socialize issues at the IEC and DoD Coordination Group meetings.
I am the only person who provides opinions.
Regular communication among all NASA offices.
blind copy all co-workers on advice
copy each other on all email; sometimes consult with each other in advance
Format and substance of prior opinions on same matter are available and consulted; also consult with OGE, and ethics officials at other agencies to compare notes when there are unusual issues. Opinions are prioritized based upon projected date response needed.
Ethics advisors share draft advice where complex/unusual questions are posed via a specified e-mail box for ethics-related matters.
Ethics database of opinions.
We have a very demanding staff. Typically, if a matter is not immediately addressed, staff members will become extremely persistent, and if a matter is not resolved clearly, it will be elevated to a broader group, often including informal consultation with the White House counsel's office.
Use standardized opinion formats, when appropriate.
Ethics officials confer prior to advice being given
DAEO personally gives or reviews all ethics advice
OVP coordinates our ethics advice with White House Counsel's Office. OVP also seeks clarifications of the regulations from OGE, as needed.
There are only two persons doing ethics, and we discuss our work daily.
Chief Legal Officer
Virtually all ethics advice is documented and placed in a case management system for retrieval and comparison.
Review ethics documentation logs
with SOPs on standard legal analysis
As the General Counsel I do it all.
Share point site
Maintain master electronic file of all advice. File is accessible to those authorized to provide advice and counsel.
contact desk officer with any questions regarding regulations

47) Which office(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) notifying OGE that a referral of a potential violation of the criminal conflict of interest statutes has been made to the Department of Justice, including the U.S. Attorneys? Check all that apply.*

Table 16

Consultation with DAEO
IG coordinates with the OGC Ethics Division when filing Form 202.
DDAEOs refer the matter to DEO, who, in turn, will notify OGE of the referral. Some components may also directly notify OGE, such as the BOP and the FBI.
Naval Criminal Investigative Service
Chief Counsel
DOI via IBC