

From: [Director of OGE](#)
To: "(b)(6) Katherine Monge's email address"
Subject: 2020 Annual Performance Report
Date: Wednesday, January 13, 2021 12:29:22 PM
Attachments: [OGE FY 2020 Annual Performance Report \(Final\).pdf](#)
[APR Transmittal Letter \(Speaker\).pdf](#)

I am pleased to transmit to you OGE's Annual Performance Report. Please see attached.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



The Honorable Nancy Pelosi
Speaker of the House of Representatives
United States House of Representatives
Washington, DC 20515

Dear Madam Speaker:

I am pleased to transmit to you the United States Office of Government Ethics (OGE) Annual Performance Report.

If you require additional information or have questions regarding these materials, please contact Shelley Finlayson, Chief of Staff and Program Counsel, at (202) 482-9314.

Sincerely,

Emory A. Rounds, III
Director

Enclosure





ANNUAL

PERFORMANCE REPORT

FISCAL
YEAR
2020

UNITED STATES
OFFICE OF
GOVERNMENT
ETHICS



MISSION

PROVIDE OVERALL
LEADERSHIP AND
OVERSIGHT OF THE
EXECUTIVE
BRANCH
ETHICS PROGRAM
DESIGNED TO
PREVENT AND
RESOLVE
CONFLICTS OF
INTEREST

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Section I – About OGE

The U.S. Office of Government Ethics (OGE), established by the Ethics in Government Act of 1978, provides overall leadership and oversight of the executive branch ethics program, which is designed to prevent and resolve conflicts of interest. OGE’s mission is part of the very foundation of public service. The first principle in the Fourteen General Principles of Ethical Conduct for Government Officers and Employees provides that “Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.”

Each day, some part of the ethics program is at work in every agency in the executive branch. The program ensures that executive branch leaders are aware of their ethical obligations and role in creating an ethical culture in their organizations as they begin government service. It ensures that public servants at all levels remain free from conflicts of interest and even the appearance of conflicts of interest, as they carry out the responsibilities the American people have entrusted to them. It ensures that employees who are seeking to leave the government avoid conflicts of interest and, after they leave, ensures that they do not exercise undue influence over their former agencies on behalf of others. Above all, it is working to protect the public’s trust in government.

Institutional Integrity in the Executive Branch

The Ethics in Government Act charges OGE with leading the effort to prevent conflicts of interest in the executive branch. OGE undertakes this important prevention mission as part of a framework comprising executive branch agencies and entities whose work focuses on institutional integrity. In addition to government ethics, this framework includes merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

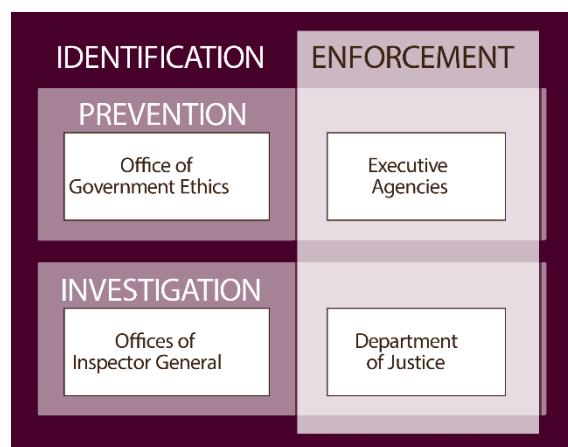


Figure 1: Institutional Integrity

Within this framework, the ethics program works to ensure that public servants carry out the governmental responsibilities entrusted to them with impartiality, and serve as good stewards of public resources. Toward these goals, the mission of the ethics program centers on preventing conflicts of interest and the appearance of conflicts of interest that stem

from employees’ financial interests, business or personal relationships, misuse of official position, official time, or public resources; and the receipt of gifts. Taken together, the systems in place to identify and resolve conflicts of interest establish a foundation on which to build and sustain an ethical culture in the executive branch.

OGE and Executive Branch Agencies: A Shared Responsibility

The executive branch ethics program is a shared responsibility. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. The head of each agency is statutorily responsible for leading the ethics program in their agency. This responsibility includes creating an ethical culture by demonstrating a personal commitment to ethics and providing the necessary resources to implement a strong and effective agency ethics program.



Figure 2: OGE and the Executive Branch

The agency head is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. Each agency's employees, supervisors, human resources officials, and Inspector General also play a significant role in maintaining the integrity of government programs and operations.

How OGE Leads and Oversees the Ethics Program

To carry out its vital leadership and oversight responsibilities for the executive branch ethics program, OGE:

- promulgates, maintains, and advises on enforceable standards of ethical conduct for more than 2.7 million employees in over 130 executive branch agencies, including the White House;
- offers education and training to the more than 5,000 ethics officials executive branch-wide;
- operates and maintains *Integrity*, a public financial disclosure management application required by the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge (STOCK) Act of 2012;
- oversees a financial disclosure system that reaches more than 26,000 public and nearly 390,000 confidential financial disclosure report filers;
- monitors executive branch agency ethics programs and senior leaders' compliance with applicable ethics laws and regulations;
- prepares for Presidential transitions and provides assistance to the President and Senate in the Presidential appointments process;
- conducts outreach to the general public, the private sector, and non-governmental organizations; and
- makes ethics documents publicly available.



Figure 3: OGE Organizational Chart

OGE's greatest resource is its multidisciplinary staff of attorneys and ethics and financial experts, as well as other key personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE is led by a Director who is confirmed by the Senate and appointed to a 5-year term by the President. As shown in

the organizational chart in Figure 3, in addition to the Office of the Director, OGE is divided into four divisions that work together to carry out OGE's mission.

Long-Term Strategic Goals



Figure 4: Strategic Goals and Objectives Framework

The public can have greater confidence in the integrity of executive branch programs and operations when government decisions are made free from conflicts of interest. OGE's four strategic goals for fiscal years 2018 through 2022 – uniformity, accountability, continuity, and engagement – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest.

Strategic Goal I: Advance a Strong, *Uniform* Executive Branch Ethics Program

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

Strategic Goal III: Contribute to the *Continuity* of Senior Leadership in the Executive Branch

Strategic Goal IV: *Engage* the Public in Overseeing Government Integrity

Starting on page 5, this document describes OGE's Fiscal Year 2020 Performance Highlights. Page 8 describes OGE's performance in more detail and provides data related to the performance goals OGE used to measure its progress toward achievement of its strategic objectives.

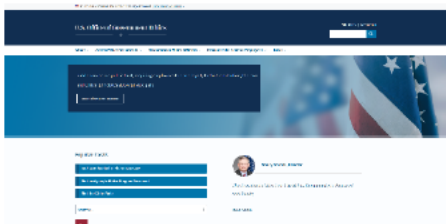
Section II – Fiscal Year 2020 Performance Highlights

OGE achieved an extraordinary array of successes in fiscal year 2020. Despite its normal heavy workload and the disruptions caused by COVID-19, OGE met all of its performance goals, successfully achieved three major mission-critical projects of executive branch-wide impact, and provided critical support to the ethics community in response to the pandemic.

Mission-Critical Projects



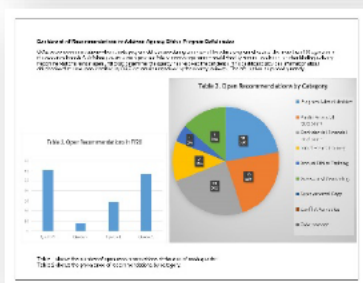
Prepared for the next Presidential election (see page 32 for more information)



Launched a wholly new website (see page 33 for more information)



Virtually held the National Government Ethics Summit (see page 13 for more information)

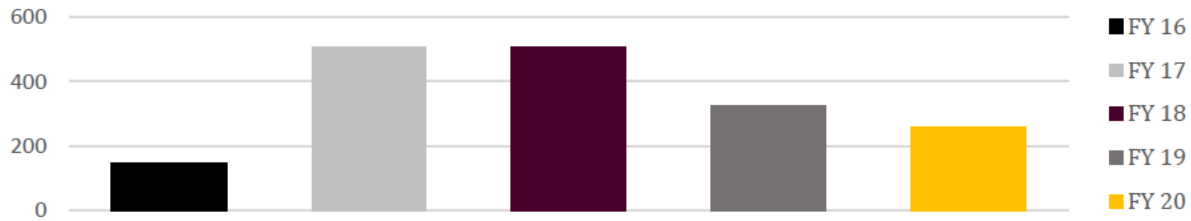


Implemented new data and transparency initiatives (see pages 19, 23, and 33)

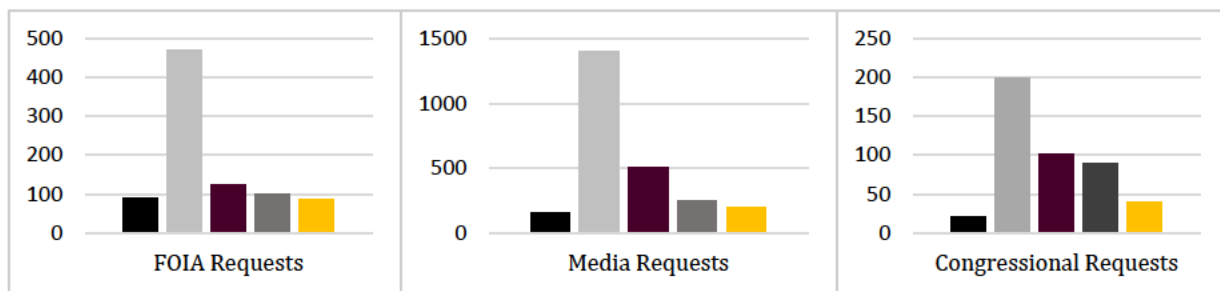
OGE Seamlessly Delivered Its Mission-Critical Work, Despite COVID-19

Continuity: Presidential Nominations

Nominee Reports (Precleared)

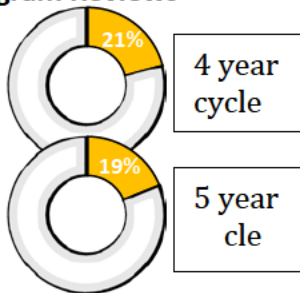


Transparency: Continuing Public Interest



Released nearly 7,000 ethics documents to citizens, press, and good government groups.

Accountability: Agency Ethics Program Reviews



Uniformity: Ongoing Work

Guidance: 17 legal and program advisories publicly issued.

Expert Support: More than 1,200 advice requests answered.

Training: Over 150 OGE training products available online.

Annual Public Financial Disclosures: Nearly 900 analyzed.



Integrity: 6th Year of Successful Operation

- Approximately 24,000 of 26,000 public financial disclosure filers use *Integrity*
- 6th Successful Independent Security Assessment
- Convened the executive branch-wide *Integrity* Advisory Council

OGE Provided Critical Support to Ethics Officials during COVID-19

OGE provided leadership, guidance, training, and strategic communications to help agencies responding directly to the pandemic and those working to manage the social, economic, and other effects of COVID-19 to maintain the public's trust. OGE also helped ethics programs remain effective while workplaces were disrupted and workforces were dispersed.

Leading the Executive Branch Ethics Program



Advising Ethics Officials: Issued Advisories

[PA-20-01](#): Maintaining Ethics Program Continuity during the COVID-19 Pandemic

[LA-20-03](#): Conflict of Interest Analysis for Stocks under 18 U.S.C. § 208

[PA-20-03](#): Initial Ethics Briefing for Senate-Confirmed Presidential Appointees

Educating Ethics Officials: Created targeted videos and held virtual orientations for senior ethics officials.

Communicating Critical Information: Distributed compilations of resources to address emerging risks and ethics issues. Convened quarterly meetings with senior ethics officials to timely convey ethics information.

Section III – Fiscal Year 2020 Performance Report

It is OGE's mission to safeguard the integrity of government programs and operations and to increase public confidence in the impartiality of government decision-making. This important mission is translated into OGE's strategic goals and objectives. OGE's success in achieving these goals and objectives is measured by its progress on established performance goals.

This section highlights OGE's major accomplishments and progress toward achieving its strategic objectives in fiscal year 2020, as measured by its performance goals.¹

Strategic Goal 1: Advance a strong, uniform executive branch ethics program

The absence of a strong, uniform executive branch ethics program with clear and consistent rules, guidance, support, and training could lead to ethical lapses and a loss of public confidence in government. OGE was established to lead this important program designed to prevent conflicts of interest on the part of executive branch employees.

To achieve its strategic goal of advancing a strong, uniform executive branch ethics program, OGE developed three strategic objectives: (1.1) provide expert guidance and support to stakeholders, (1.2) strengthen the expertise of officials who are integral to the executive branch ethics programs, and (1.3) continuously refine ethics policy and issue interpretive guidance.

Strategic Objective 1.1: Provide expert guidance and support to stakeholders

OGE achieved its objective of providing expert guidance and support to stakeholders in fiscal year 2020 through quality Desk Officer services, communications with ethics officials and other external stakeholders, assistance to *Integrity* users, and support for the work of the enforcement and international communities. Key highlights of OGE's work are described below.

Provided on-demand expertise to agency ethics officials

OGE provides necessary support to agency ethics officials so they can provide uniform and effective ethics guidance to the more than 2.7 million federal employees in the executive branch who serve the American people.

OGE Support for Agency Ethics Officials

- **Desk Officer Program**
- **Quarterly Meetings**
- **DAEO Designation Letter**
- **DAEO Orientation**
- **Welcome Letter from Director**
- **In-Person/Virtual Trainings for Senior Officials**
- **Online Ethics Learning Events**

¹ The performance goals are based on statistical data from a variety of sources, including post-training evaluations, an annual agency ethics program questionnaire, website analytics, and an annual survey of ethics officials to assess satisfaction with OGE's services and products.

OGE provides timely, expert advice on applying ethics laws and regulations, and disseminates up-to-date ethics information ethics practitioners need to do their jobs effectively.

OGE's Desk Officers assist agencies every day in resolving difficult ethics issues requiring expertise that only the supervising ethics office can provide. In fiscal year 2020, OGE Desk Officers and attorneys responded to approximately 1,200 requests for assistance from agencies. Thirty percent (30%) of those requests were related to public financial disclosure. Desk Officers also proactively met with agency ethics offices to provide expertise and support, and to offer a broad range of OGE's services.

In fiscal year 2020, OGE's Director sent a welcome letter to each new Designated

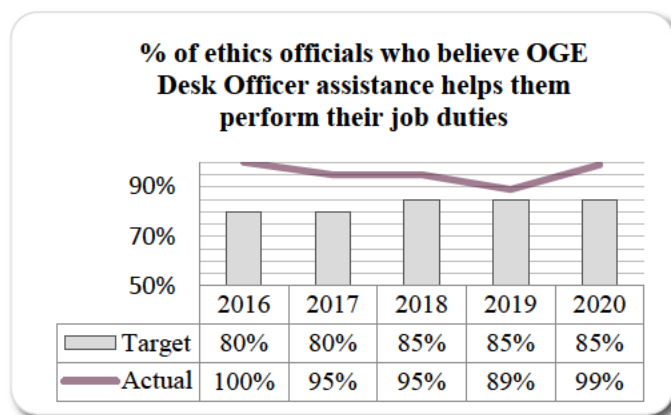


Figure 5: Desk Officer Assistance

and Alternate Designated Agency Ethics Officials (DAEOs/ADAEOs) with critical details about their important roles and responsibilities, available professional development including OGE's DAEO/ADAEO orientation program, and the array of resources OGE provides to support agency ethics officials. OGE Desk Officers also in-person and virtually met with new agency ethics officials to provide an overview of ethics program requirements and to offer OGE's services.

Performance Goal: OGE measured the performance of the Desk Officer program by surveying ethics officials who requested assistance during fiscal year 2020. Ninety-nine percent (99%) of survey respondents indicated that Desk Officers helped them to perform their job duties (*see* Figure 5).

Target: 85% | Actual: 99%

Engaged ethics officials and other external stakeholders to share information and shape policy

OGE continued its efforts to share ethics-related information with ethics officials and other external stakeholders so they have the most up-to-date information needed to carry out their responsibilities. To support this effort, OGE used an email listserv, meetings, and its [website](#) to provide timely and relevant information to the ethics community. See page 7 for a



descriptions of OGE's communication with ethics officials with regard to COVID-19 specific issues.

More specifically, in fiscal year 2020, OGE notified senior executive branch officials about OGE's initiatives by organizing numerous meetings, conference calls, focus groups, and webinars. For example, OGE's Director continued the practice of holding quarterly meetings for senior agency ethics officials. At these meetings, attended by senior ethics officials from over 80 executive branch agencies, OGE's senior leaders shared information critical to managing an effective ethics program, encouraged discussion of current ethics issues facing the executive branch, and consulted with agency ethics officials regarding contemplated changes to OGE's policies and regulations.

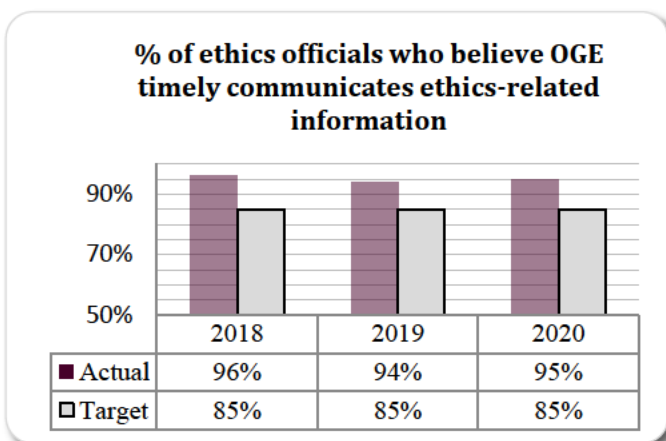


Figure 6: Timely Communication

In response to OGE's annual survey of ethics officials, ninety-eight percent (98%) of respondents indicated that they felt more informed as a result of attending these quarterly meetings.

Performance Goal: OGE measured the timeliness of its communications by surveying ethics officials. Ninety-five percent (95%) of survey respondents indicated that OGE timely communicates ethics-related information (*see* Figure 6).
Target: 85% | Actual: 95%

Provided support for Integrity

OGE continued to support agencies' use of [Integrity](#), OGE's executive branch-wide electronic public financial disclosure filing system. In addition to helping incoming Presidential nominees—many of whom had extremely complex financial disclosure filings—to more accurately and easily complete their disclosures, the system enabled the executive branch to seamlessly continue the public financial disclosure process throughout the ongoing COVID-19 pandemic. During the pandemic, the value of *Integrity* was even more apparent, when virtual access was essential and public trust mattered most. In addition, use of the system expanded to nearly 24,000 of approximately 26,000 filers in the executive branch, including all of the Department of Defense's public financial disclosure filers. OGE continued to provide necessary help desk services and user resources, including



written, online tools, and live orientations and training. Additional information about *Integrity* can be found on page 41.

Performance Goal: OGE exceeded its goal for the percentage of agency administrators (91%) who are satisfied with the support provided by OGE on its electronic public financial filing system (see Figure 7). Target: 70% | Actual: 91%

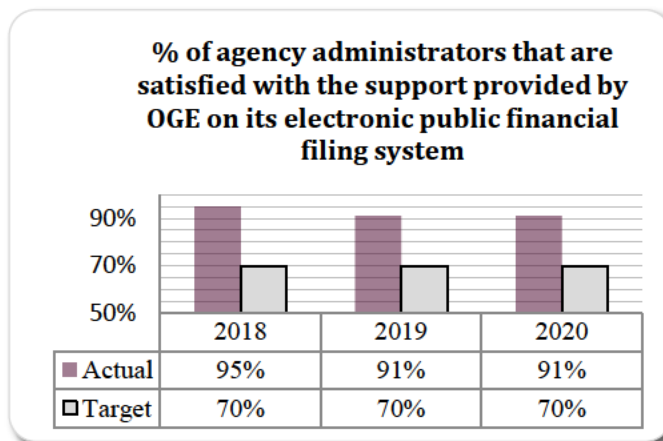


Figure 7: Integrity Support

Provided technical assistance to Congress



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OGE's responses to congressional inquiries support government accountability. Read them here:
oge.gov/web/oge.nsf/Co...

OGE serves as the legislative liaison for the executive branch ethics program to Congress. OGE works to build congressional understanding of the program, to inform congressional oversight, and to provide technical expertise on proposed revisions to ethics laws. Notably, OGE [responded](#) to 12 complex inquiries from members of Congress and provided 36 telephone consultations in response to requests for technical assistance on draft legislation and on a wide variety of executive branch

ethics issues. Additionally, OGE provided significant expertise and support to the Government Accountability Office on its related reviews.

OGE also represented the executive branch ethics community by providing ethics expertise on 30 requests for comment on legislative materials and Executive Orders and Presidential Memoranda circulated by the Office of Management and Budget (OMB). OGE achieved a one hundred percent (100%) success rate for timely responding to all of the requests it received.



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OGE provides assistance to the President and Senate in the Presidential appointment process. Yesterday, OGE briefed more than a dozen Senate committee staff about the nominee process for Presidentially-appointed Senate-confirmed officials.

For additional information on the numerous requests OGE receives from outside entities see page 35.

Supported the work of the ethics enforcement communities

OGE supported the vital work of the ethics enforcement communities, including Inspectors General (IGs), the Department of Justice (DOJ), and employee relations personnel, who are responsible for holding agency employees accountable for abiding by the ethics laws. During fiscal year 2020, OGE staff provided direct support to approximately 15 investigators from Inspectors General offices and to 3 federal prosecutors. OGE assisted with the interpretation and application of federal conflict of interest laws and ethics regulations in connection with numerous live enforcement matters.



In concert, OGE and agency ethics officials and IGs work to ensure the effectiveness of the executive branch ethics program. As part of that important relationship, OGE serves as a statutory member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and on the CIGIE Integrity Committee. In fiscal year 2020, OGE continued to serve as a standing member, participating in CIGIE's meetings, and supporting its Integrity Committee. For information on the training OGE provides to enforcement communities, see page 17.

Contributed to international anti-corruption efforts

OGE supported U.S. anti-corruption foreign policy by (1) assisting the State Department in ensuring that the U.S. meets its international anti-corruption obligations, (2) supporting U.S. participation in organizations that shape anti-corruption norms, and (3) supporting other countries' efforts to effectively manage conflicts of interest.

In fiscal year 2020, OGE assisted the State Department in ensuring that the U.S. meets its anti-corruption obligations by participating in two multilateral peer reviews pursuant to anti-corruption treaties. OGE also helped prepare for meetings related to the UN Convention against Corruption and made significant contributions to the peer review mechanism that the U.S. participates in as a signatory to the Inter-American Convention against Corruption. In addition, OGE provided an overview of its financial disclosure system as part of the Council of Europe's Group of States against Corruption review of Sweden.

OGE continued to help shape international anti-corruption norms and good governance policies in fiscal year 2020. For example, OGE provided support to U.S. representatives for other anti-corruption working groups, provided comments on the IACAC's Model Conflict of Interest Law, and provided input on the Organisation for Economic Co-Operation and Development's Working Party of Senior Public Integrity Officials' forthcoming Integrity Handbook.

During fiscal year 2020, OGE supported other countries' efforts to effectively manage conflicts of interest, including by providing comments to the U.S. report on implementation of the Lima Commitment. OGE also continued to meet with foreign public

and private sector groups about the executive branch ethics program to discuss how the ethics program fits into the broader context of anti-corruption, good governance, and transparency. In fiscal year 2020, OGE briefed 5 foreign delegations comprising 90 individuals representing 31 countries.

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

OGE strengthened the expertise of officials who are integral to the executive branch ethics program by encouraging and supporting ethical leadership, conducting distance and in-person learning events, and maintaining an extensive library of ethics resources.

Encouraged and supported ethical leadership throughout the executive branch

Ethical culture begins with ethical leadership throughout an organization, from the top down. OGE engaged agency leaders on the importance of ethics and sensitized federal managers to ethics issues. In fiscal year 2020, OGE's Director met with the heads of four executive branch regulatory agencies to convey the importance of ethical leadership, offer OGE's support, and ask for their personal commitment to lead strong, well-resourced ethics programs at their agencies. In addition to these meetings, OGE's Director sent a [memorandum](#) to all agency heads asking them to take affirmative steps to remind their agency officials and employees of the importance of ethics in government, in light of the challenges created by the pandemic.

OGE staff also engaged with senior leadership directly and indirectly through training, presentations, program reviews, external communications, nominee financial disclosure reports and ethics agreements, and publications. In addition, OGE shared tools and tactics to help leaders effectively communicate the ethical expectations for their organizations.

Held the National Government Ethics Summit by pivoting to a virtual format the day before the event

In March 2020, OGE successfully held the [National Government Ethics Summit](#), a cost-effective, multi-day training event for over 500 executive branch ethics officials and external stakeholders, despite the unexpected disruption caused by COVID-19.

The Summit provides members of the government ethics community with opportunities to deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside

Who Spoke at the Summit?

- Executive branch ethics officials
- Inspectors General
- Ethics officials from Congress and the Judiciary
- International organizations
- Department of Justice
- General Services Administration
- Office of Special Counsel

government, and build connections with fellow ethics officials who can lend a hand in resolving complex ethics issues.

OGE had planned to convene this event in a federal space in the Washington, DC Metro area, but was forced by the COVID-19 pandemic to move the event online the day before it was scheduled to begin. OGE made this decision to protect the health of attendees and organizers. OGE used existing virtual capabilities to quickly pivot and deliver 52 of the 64 (81%) scheduled sessions virtually. These virtual events garnered more than 4,000 views and OGE made many of them available online as on-demand courses, increasing their impact and value. Members of the public and media can [view](#) these materials online free of charge.



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Welcome to Day 1 of the 2020 Virtual National Government Ethics Summit. We started at 9:30 AM EDT with welcome remarks, including remarks by OGE's Director Emory Rounds and OGE's executive leadership team.
[#EthicsSummit](#)



Opening Remarks National Government
Ethics Summit 2020
[youtube.com](#)

Each day of the three-day Summit had a theme: Emerging Issues, Program Success and Accountability, and Election Readiness. Throughout the Summit, attendees learned about important emerging issues, such as issues related to the increased demand for ethics documents, program topics, such as managing for an ethical culture, and election preparedness topics, such as advanced nominee financial disclosure.

OGE's Summit provided essential training to ensure that agency ethics officials are prepared for the Presidential election, confidently able to manage emerging ethics issues, and well equipped with practices to create stronger ethics programs and ethical cultures across the executive branch.

Who Registered for the Summit?

- Ethics officials from executive branch agencies
- Judicial & congressional ethics officials
- Ethics officials from state and local governments
- Staff from various offices of Inspectors General
- Representatives from international organizations and governments

Conducted critical training and professional development for ethics officials

Well-trained ethics officials help agency leaders and employees manage risks every day. Ethics officials must have the knowledge, skills, and abilities necessary to provide expert counsel, identify and resolve conflicts of interest, deliver quality training, and manage effective programs, making their ongoing professional development vital to the strength of the ethics program. Toward this effort, OGE provided the following professional development opportunities for ethics officials in fiscal year 2020.

On-Demand Learning: OGE provided comprehensive education [resources](#) for ethics officials at all experience levels, including seasonal, on-demand trainings before critical deadlines. Learning events offered during fiscal year 2020 focused on election year preparedness, as well as seasonally appropriate refreshers on ethics fundamentals, such as financial disclosure review and ethics education for employees.

Massive Open Online Courses: OGE also developed and delivered several massive open online courses (MOOCs) on gifts from outside sources, public and confidential financial disclosure and post-employment. MOOCs enable large numbers of ethics officials to experience content OGE typically delivers through half-day live-training workshops. These multi-session presentations bring the feel of in-person classroom training to the online classroom by incorporating independent work, lectures, practical exercises, and self-assessments.

Curricula: In fiscal year 2020, OGE began to develop and publish a series of “curricula” for ethics programs to use to train staff, particularly those newly assigned to ethics duties. Focusing on both perennial topics, such as public and confidential financial disclosure and ethics education, as well as topical issues such as post-employment and ethics program continuity during the pandemic, these curricula are a compilation of links to the most relevant educational and advisory resources OGE has available on the subject.

Virtual Library: To ensure that ethics officials across the nation have access to OGE’s training, OGE continued to broadcast its virtual training sessions through social media platforms and made them publicly available through its [Institute for Ethics in Government](#) (IEG) Resource Library. OGE’s virtual [library](#) includes more than 150 education resources designed for use by ethics officials, including recordings of training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity. OGE encouraged ethics officials to use these resources to create self-paced curricula for their professional development and to strengthen their ethics program. Overall, in fiscal year

2020, the entire portfolio of IEG videos were viewed nearly 22,000 times with an average duration of 20 minutes.

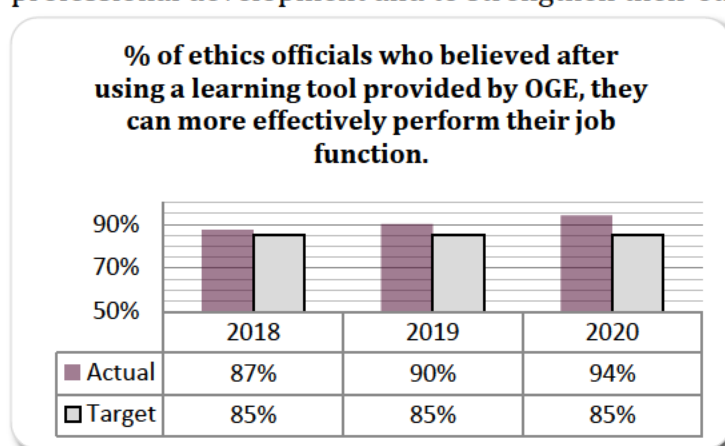


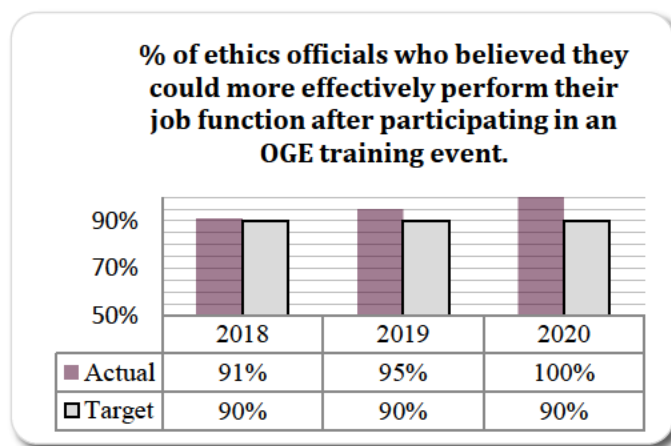
Figure 8: Learning Tools

Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believed that after using a learning tool provided by OGE, they can more effectively perform their job functions (see Figure 8). Target: 85% | Actual: 94%

Provided orientations to senior leaders of executive branch ethics programs

OGE also conducted orientations for new DAEOs and ADAEOs to introduce them to their roles and responsibilities as ethics program leaders and advocates. Nearly seventy senior officials participated in these training sessions.

In fiscal year 2020, OGE hosted, for the first time, a virtual multi-day orientation and an intensive curriculum in ethics, exclusively for regional DAEOs and ADAEOs, for whom travel to Washington, DC for in-person training is difficult. The intensive curriculum consisted of 3 half-day sessions covering gifts, conflicts of interest, misuse and impartiality, and travel and related benefits.



Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believed they could more effectively perform their job function after participating in an OGE training event (*see* Figure 9). Target: 90% | Actual:100%

Provided consultative and other resources to support an ethical federal workforce

Figure 9: OGE Training

OGE recognizes that maintaining ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. In response to agency requests for support in developing strong ethics training, OGE met with ethics staff of the Department of Veterans Affairs, the U.S. Agency for Global Media, the U.S. Department of Education Office of the Inspector General, and the Inspector General Academy to share OGE resources and to consult on strategies and methodologies for making their employee ethics training and communications more effective.

In addition, OGE produced distance-learning videos for the ethics community dealing with new employee and annual ethics training. One video, [*New Employee Orientation: An Agency Culture Bootcamp*](#), explored how initial ethics orientation can and should introduce new employees to agency culture. Another video, [*Ethics Education- Providing Annual Ethics Training During the COVID-19 Pandemic*](#), offered suggestions for planning, creating, and facilitating annual training in a disrupted work environment.

Trained enforcement communities

To ensure that executive branch ethics laws can be effectively enforced, OGE provides advice and training to the various enforcement communities, including the Department of Justice's criminal and civil divisions, Inspectors General, and employee relations professionals. OGE routinely assisted Inspectors General and prosecutors in understanding the complexities of the ethics laws and regulations involved in ethics-related investigations. OGE provided an array of training to Inspectors General in fiscal year 2020. For example, OGE instructors provided well-received training to 50 attendees at the Inspector General Criminal Investigator Academy, focusing on investigating ethics-related matters and working with ethics officials. This particular training is an integral part of the Academy's curriculum and complements a web-based training module OGE developed for Inspectors General investigators. In addition, OGE also provided training to approximately 150 employees of the U.S. Department of the Interior's Office of the Inspector General.

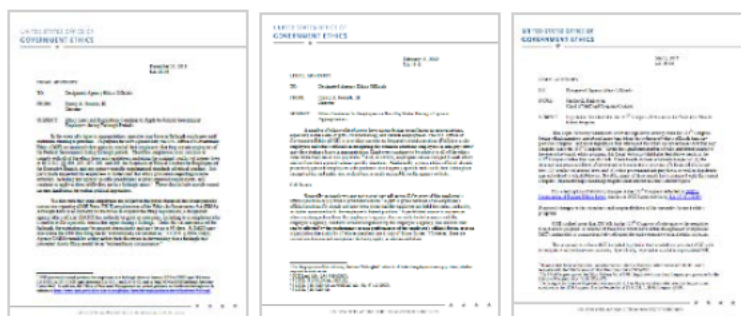


Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance

OGE continuously refined ethics policy and issued interpretive guidance by providing timely legal and program guidance, conducting in-depth reviews of regulations, publishing regulations, and renewing forms. Key highlights of OGE's work are described below.

Issued interpretive guidance that integrated stakeholder feedback

In addition to providing day-to-day assistance through the Desk Officer program, OGE issues [legal and program advisories](#) to disseminate critical information to the executive branch ethics community and to promote uniform interpretation of ethics laws, regulations, and policies.



Executive branch ethics officials rely on advisories as an integral component of the body of interpretive and programmatic guidance maintained by OGE.

In fiscal year 2020, OGE issued seven legal advisories providing guidance on emerging ethics issues and in response to agency ethics officials on specific questions from employees. For example, OGE issued a legal [advisory](#) sharing resources on agency supplemental ethics regulations to assist agency ethics officials who seek to augment the uniform ethics requirements with agency-specific provisions.

In addition to legal advisories, OGE issued 10 timely and informative program advisories covering ethics program requirements, including an [advisory](#) that provided suggestions for maintaining ethics program continuity during the disruptions caused by the COVID-19 pandemic.

In developing legal and program advisories, OGE continued to draw upon the expertise of agency ethics officials by consulting with key members of the ethics community. OGE solicited views, convened focus groups, and obtained feedback on draft advisories, thereby increasing the relevance and risk mitigation of the advisories and reducing inconsistencies in the application of ethics laws. Anecdotal feedback from agency ethics officials reflects increased satisfaction with OGE's approach to developing advisories.

% of ethics officials who believe legal and program advisories help them perform their job duties

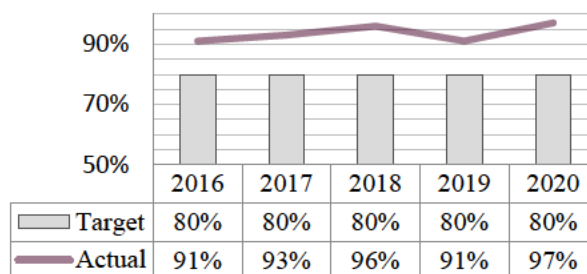


Figure 10: Advisories

Performance Goal: OGE exceeded its goal for the percentage of ethics officials who believe advisories helped them perform their job duties (see Figure 10).

Target: 80% | Actual: 97%

Reviewed, drafted, and published executive branch ethics rules

OGE is responsible for providing clear policies and guidance on the laws and regulations that serve as the building blocks of the executive branch ethics program, such as the criminal conflict of interest laws and Standards of Ethical Conduct for Employees of the Executive Branch. In fiscal year 2020 OGE: (1) actively sought extensive stakeholder feedback while developing its regulations, (2) conducted in-depth regulatory reviews, (3) published final rules, and (4) consulted on changes to agency-specific ethics regulations and separate component designations.

Actively sought extensive stakeholder feedback while drafting regulations

In fiscal year 2020, for the first time in its history, OGE held two public meetings, which provided OGE with the opportunity to receive valuable stakeholder input on its development of a legal expense fund regulation before publishing a proposed rule. As required by the Ethics in Government Act (EIGA), OGE submitted the draft proposed rule to the Department of Justice (DOJ) and the Office of Personnel Management (OPM) for consultation. Consultation with DOJ and OPM is a requirement for all of OGE's pending proposed rules pertaining to conflicts of interest and ethics in the executive branch. At the conclusion of that consultation, the regulation was submitted to the Office of Management and Budget (OMB) for interagency review. OGE began the process of reviewing the comments received during the interagency review.

Conducted an in-depth regulatory review

OGE continued its work to modernize the Standards of Conduct in fiscal year 2020 by completing an in-depth regulatory review of the Standards. OGE expects to publish a proposed regulation modernizing these rules in fiscal year 2021. A draft proposed rule was submitted to DOJ and OPM for review, as required by the EIGA. In addition, OGE continued its review of the regulation governing financial conflict-of-interest exemptions at 5 C.F.R. part 2640.

Published final rules

In fiscal year 2020, OGE published three rules. OGE completed a final rule implementing inflationary adjustments to the civil monetary penalties provided in the Ethics in Government Act. OGE also published a final rule updating the gifts and travel reimbursements reporting thresholds for both public and confidential financial disclosure reports, as well as the widely attended gathering gift documentation threshold. And, as required by Executive Order 13891, OGE published a final rule establishing the procedures

for the issuance of guidance documents and the process by which the public may petition for the modification or withdrawal of guidance documents.

Consulted on changes to agency-specific ethics regulations and separate component designations

OGE consults with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs. In fiscal year 2020, OGE jointly issued revisions to Department of Agriculture and National Labor Relations Board supplemental regulations, and worked on supplemental regulations for a number of other agencies, including the Department of Defense, the National Transportation Safety Board, the U.S. Office of Special Counsel, and the U.S. Postal Service. OGE also published a legal advisory ([LA-20-02](#)) with updated guidance to assist agencies in creating and updating supplemental regulations. In fiscal year 2020, OGE updated three component designations (5 C.F.R. Part 2641, Appendix B) for the Departments of Commerce, Labor, and Treasury, based on agency recommendations related to applying post-employment restrictions to former employees of specific agency components.

Renewed key ethics forms

OGE continually works to ensure that its forms are up-to-date, accurate, and in compliance with legislative and regulatory changes. OGE also continually provides timely responses to feedback from users and stakeholders. OGE sought and received OMB approval for a three-year renewal of the Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e) and the Executive Branch Confidential Financial Disclosure Report (OGE Form 450). The renewal included modifications to improve the instructions, makes the forms more user-friendly, and reflects changes to the financial disclosure regulation (5 C.F.R. part 2634), which went into effect on January 1, 2020. OGE has also received OMB approval for a three-year renewal of the Model Trust Documents.

Strategic Goal 2: Hold the executive branch accountable for carrying out an effective ethics program

As the supervising ethics office of the executive branch, OGE is responsible for conducting oversight to ensure compliance with the ethics laws and rules across the more than 130 federal agencies.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective ethics program, OGE has developed two strategic objectives: (2.1) monitor agency compliance with executive branch ethics program requirements, and (2.2) monitor senior leaders' compliance with individual ethics commitments.

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

In fiscal year 2020, OGE monitored agency compliance with executive branch ethics program requirements by conducting reviews of agency ethics [programs](#), issuing recommendations, collecting and analyzing program data, and collecting information on potential violations. Key highlights of OGE's work are described below.

Reviewed agency ethics programs for compliance

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch, in fiscal year 2020, OGE began the process of increasing the frequency of its reviews of agency ethics programs using a risk-based analysis. As a result, OGE moved all cabinet level agencies to a four-year review cycle, and conducted specific risk assessments of all other agencies to determine how often each should be reviewed. OGE moved agencies at a higher risk for conflicts of interest to a four-year cycle, and

Agency Ethics Program Review Reports (Plenary and Inspections) Published in Fiscal Year 2020

Ability One Commission
Access Board
Chemical Safety & Hazard Investigation Board
Commodity Futures Trading Commission
Defense Commissary Agency
Defense Finance and Accounting Service
Defense Information Systems Agency
Defense Threat Reduction Agency
Department of Health and Human Resources
Department of Interior
Department of Labor
Department of State
Department of Transportation
Department of Defense Office of Inspector General
Environmental Protection Agency
Export- Import Bank of the United States
Federal Energy Regulatory Commission
Federal Maritime Commission
General Services Administration
International Development Finance Corporation
Millennium Challenge Corporation
National Credit Union Administration
National Endowment for the Humanities
Nuclear Waste Technical Review Board
Pension Benefit Guarantee Corporation
Privacy and Civil Liberties Oversight Board
Selective Service System
Small Business Administration
United States Postal Service

agencies at a lower risk remain on a five-year review cycle. In addition, irrespective of an agency's planned review cycle, OGE conducts real-time reviews of an agency ethics program if OGE becomes aware of significant programmatic weaknesses, described in more detail below.

Through agency ethics program reviews — plenary, inspection, and follow-up — OGE ensures consistent and sustainable agency ethics program compliance with established executive branch ethics laws, regulations, and policies, and provides recommendations for meaningful program improvement. All three types of reviews are designed to identify and remediate systemic risks in agency ethics programs. Reviews include an examination of agency ethics program materials, such as financial disclosure reports, documentation of ethics advice provided to employees, training records, and ethics agreement compliance tracking.

In fiscal year 2020, OGE conducted 28 program reviews and 22 follow-up reviews. Additionally, OGE conducted a focused review at one agency based on evidence of potential serious program deficiencies. Reports on each of these 51 reviews were published and posted on OGE's [website](#). These reviews included plenary reviews at cabinet-level departments and at the largest executive branch agencies, and inspection reviews at smaller agencies. OGE also conducted appropriate follow-up reviews to evaluate agencies' progress in implementing recommendations made by OGE in its previous program review reports.

Milestone: OGE exceeded its milestone of conducting agency ethics programs reviews at 20% of the agencies. OGE reviewed 21% (28 agencies) Milestone: 20% of agencies | Actual: 21% of agencies

OGE responded to ethics program risks in real time

OGE's program review plan includes flexibility to respond in real time when there are indicators that an agency's ethics program may be out of compliance. For example, in addition to the ethics program reviews that had been scheduled for fiscal year 2020, OGE also conducted an intensive, limited-scope review of an agency's ethics program in response to information from various sources indicating a systemic failure in the program. This failure could have affected national-level policy promulgated by the agency. OGE's review identified specific deficiencies and directed the agency to take appropriate corrective action.

When necessary, OGE's senior leadership engages with heads of agencies to address ongoing compliance issues at that agency. For example, after repeated efforts to follow-up on an agency's progress in correcting deficiencies identified during an ethics program review, OGE's Director and other senior officials personally engaged with the agency's leadership. A face-to-face meeting between agency heads helped to emphasize the importance of having a strong ethics program and the risks associated with having a weak one.

OGE also analyzed the compliance data gathered through its [2019 Annual Agency Ethics Program Questionnaire](#) (Annual Questionnaire) to identify agencies with potential substantive deficiencies in key ethics program elements. Five of the agencies OGE reviewed in fiscal year 2020 were selected for review based on the analysis of agency responses to the Annual Questionnaire. For more information on the Annual Questionnaire, see page 24.

Issued recommendations to improve agency ethics program compliance

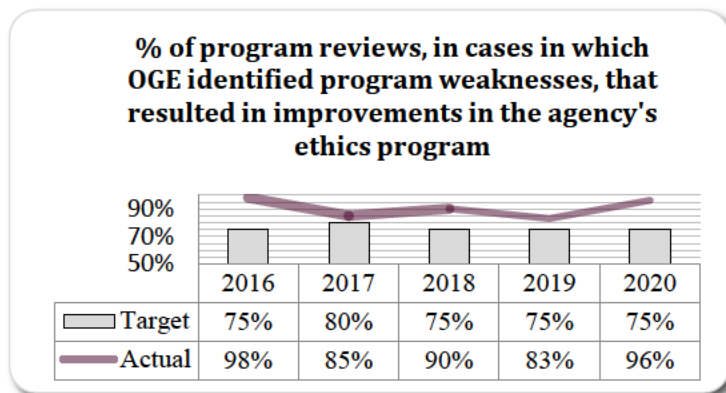
When an ethics program review identifies a deficiency, the resulting report includes a corresponding recommendation directing the agency to take actions necessary to correct the deficiency. In fiscal year 2020, OGE's ethics program reviews resulted in 99

"Thank you and your team for the professional, efficient, and insightful program review. We appreciate your feedback, and we will absolutely be using your findings as a tool to improve our ethics program." – An Ethics Official

recommendations addressing specific ethics program deficiencies. OGE review teams also advised agency ethics officials of 26 additional deficiencies that would have resulted in recommendations

had they not been corrected prior to the completion of OGE's review. OGE provides considerable technical assistance to agencies in correcting problems as part of its program review process, which may allow an agency to take immediate action and preclude the necessity of issuing a recommendation. OGE publishes its reviews which identify when an agency has a recommendation, as well as when the agency has taken the actions necessary to close OGE's recommendation for program improvement. In fiscal year 2020, for the first time, OGE began to publicly post [dashboards](#) displaying the number of open program review recommendations at the end of each quarter.

OGE's recommendations for program improvement have significant impact. In just one example, the ethics program review found that only 52% of an agency's public financial disclosure reports were certified timely during the period examined. OGE issued a recommendation directing the agency to improve the timeliness of certification. Timely certification of financial disclosure reports is critical to ensuring that real and potential conflicts of interests are quickly identified and quickly resolved. The action mandated by OGE's recommendation resulted in 97% of the agency's public financial disclosure reports being certified timely.



Performance Goal: In cases in which OGE identified a program weakness during a program review, OGE exceeded its target for the percentage of program reviews that resulted in improvements in the agency's ethics program (see Figure 11). Target: 75% | Actual: 96%

Figure 11: Program Review Recommendations

Collected and analyzed program data from executive branch agencies

OGE collects ethics program data from each of the more than 130 executive branch agencies through its [Annual Agency Ethics Program Questionnaire](#) (Annual Questionnaire). Agency responses to the Annual Questionnaire give OGE a view into each agency's ethics program, and the compiled data provides OGE with an annual overview of the entire executive branch ethics program. In fiscal year 2020, OGE administered the [2019 Annual Questionnaire](#) using a custom electronic application which has improved OGE's ability to analyze the information collected and increased the efficiency of the data collection process. Notably, one-hundred percent (100%) of agencies complied with the requirement to submit their ethics program data.



In fiscal year 2020, OGE continued to share key highlights from its Annual Questionnaire with ethics officials and the public by posting on its website a [report](#) summarizing data highlights and trends, as well as each agency's [responses](#) to the Annual Questionnaire. Having access to this data allowed ethics officials to compare aspects of their programs with those of other agencies, including the allocation of ethics program resources. This data collection ensures that each agency does a year-end assessment of its ethics program and helps the public gain a better understanding of the scope and impact of the executive branch ethics program.

In fiscal year 2020, for the first time, OGE also held a data call for agency practices related to ethics advice and counsel. OGE gained insight into each agency's implementation of this key element of their ethics program and used the results to tailor the support it provides to agencies. To help ethics officials learn from other practitioners, OGE shared the results in a session at its

National Government Ethics Summit and made the results of the data call available to the public in a summary [report](#) published on its website.

Increased transparency and tracked potential criminal violations of ethics laws

In fiscal year 2020, for the first time, OGE published a [dashboard](#) displaying the number of referrals of potential violations of the criminal conflict of interest laws (18 U.S.C. §§ 202-209) it received from agencies, by quarter, as well as the statutes implicated in the referrals. Agencies are required to concurrently notify OGE's Director when any matter involving a potential violation by an executive branch employee of criminal conflict of interest laws is referred for investigation or prosecution to the Department of Justice. Agencies submit these notifications and information regarding the disposition of the matter to OGE. In fiscal year 2020, agencies submitted nearly 60 such notifications. OGE tracks and follows up on these conflicts of interest referrals to the Department of Justice to ensure that agencies are considering disciplinary or other corrective action in the event of declinations of prosecution.

OGE also published its [annual survey of prosecutions](#) involving the criminal conflict of interest criminal statutes (18 U.S.C. §§ 202-209) and other related statutes for calendar year 2019. OGE published information on 13 prosecutions. OGE publishes the information to demonstrate the consequences of ethics violations and encourages agencies to use these reported cases as examples when conducting ethics training.

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

OGE monitored senior government leaders' compliance with their individual ethics commitments by requiring the leaders to certify that they completed the actions they committed to in their ethics agreements to resolve conflicts of interest. OGE also reminded leaders of their ethics responsibilities, conducted second-level reviews of certain officials' financial disclosure reports, reviewed Certificates of Divestiture, and consulted with agencies on waivers. Key highlights of OGE's work are described below.

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointee		
1. Appointee's Information	a. Appointee's Name:	to be completed by OGE
	b. Position Title:	to be completed by OGE
	c. Agency:	to be completed by OGE
	d. Date Ethics Agreement Signed:	to be completed by OGE
	e. Date Confirmed:	to be completed by OGE
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE
2. Resignations	I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
		Filing Date(s) of OGE Form 278-T Report(s):

Monitored compliance with commitments made by incoming agency leaders to resolve conflicts of interest

OGE worked to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remained free of conflicts of interest after taking office. OGE identified and resolved potential conflicts of interest on the part of PAS nominees by establishing written ethics agreements with them prior to confirmation. OGE then monitored PAS ethics agreement compliance through the collection and review of Certifications of Ethics Agreement Compliance, which require appointees to attest to their compliance with their ethics agreements. These certifications are posted to OGE's [website](#) allowing the public to monitor senior leaders' compliance with commitments set forth in ethics agreements.

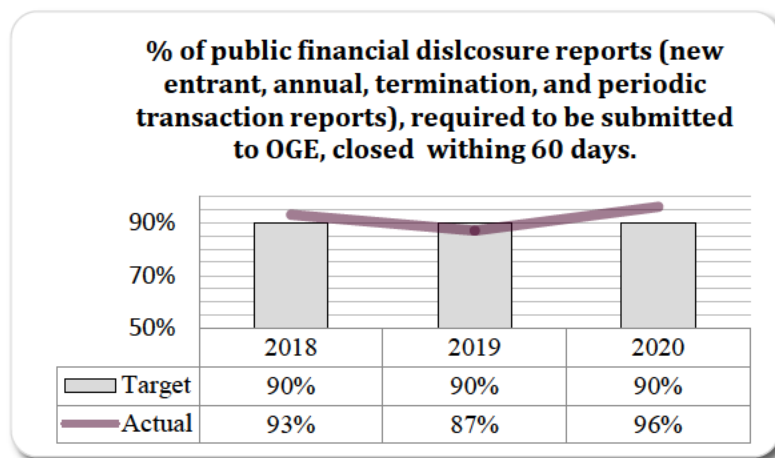
In fiscal year 2020, 161 PAS appointees were required to certify that they had complied with their ethics agreements. OGE received certifications from 151 (94%) of the PAS appointees, affirming compliance with all ethics agreement requirements by the applicable due date.

Reminded agency heads of their ethical leadership responsibilities

In fiscal year 2020, in addition to OGE's Director holding individual meetings with the heads of executive branch agencies to convey the importance of ethical leadership, OGE also issued a [memorandum](#) to agency heads asking them to take affirmative steps to remind their agency officials and employees of the importance of ethics in government. In addition, OGE continued to conduct training for new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public's trust. Lastly, OGE published several [leadership notes to its website to remind agency leaders, as well as the public, about the importance of ethical leadership and its impact on executive branch programs and operations.](#)

Reviewed the public financial disclosure reports of top officials

OGE also helps ensure that senior officials remain free from conflicts of interest by timely reviewing the annual, termination, and periodic transaction financial disclosure reports of PAS officials, as well as new entrant and other public financial disclosure reports filed by Designated Agency Ethics Officials (DAEOs) and certain White House officials. In fiscal year 2020, OGE carried out this work by successfully closing 2,200 public financial disclosure reports (new entrant, annual, termination, and periodic transaction reports).



Performance Goal: OGE exceeded its target to close ninety percent (90%) of its reviews of public financial disclosure reports, including new entrant, annual, termination, and periodic transaction reports required to be submitted to OGE, within 60 days of receipt (*see* Figure 12) Target: 90% | Actual: 96%

Reviewed requests for Certificates of Divestiture (CDs)

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain individuals may be eligible for a Certificate of Divestiture (CD) to offset the tax burden. In fiscal year 2020, OGE reviewed 109 requests for CDs and timely published to its [website](#) all CDs that it issued.

Figure 12: Financial Disclosure Review

Consulted with agencies regarding the issuance of waivers to the primary criminal conflict of interest law, 18 U.S.C. § 208

The primary criminal conflict of interest law, 18 U.S.C. § 208, requires an employee to be disqualified (“recused”) from a particular matter if the matter would have a direct and predictable effect on the employee’s own financial interests or on certain financial interests that are treated as the employee’s own, such as those of the employee’s spouse or a prospective employer. In some cases, a waiver to these restrictions may be appropriate. OGE consulted with agencies on nearly 70 waivers, prior to their issuance, and collected copies of final waivers.

Strategic Goal 3: Contribute to the continuity of senior leadership in the executive branch

OGE has a vital role in supporting the President's constitutional duty to nominate and appoint officers to the executive branch, and to prevent the highest officials in government from having conflicts of interest.

To achieve its strategic goal of contributing to the continuity of senior leadership in the executive branch, OGE has developed two strategic objectives: (3.1) prepare for a Presidential transition, and (3.2) provide assistance to the President and the Senate in the Presidential appointment process.

Strategic Objective 3.1: Prepare for a Presidential transition

OGE actively engaged in preparing for the 2020 Presidential election to ensure it is ready to carry out its unique role in the Presidential appointments process as the leader of the executive branch ethics program. OGE actively participated in executive branch-wide election readiness efforts, engaged with stakeholders, provided expert briefings and training, updated key election-related resources, and reviewed Presidential candidate reports. Key highlights of OGE's work are described below.

Served on the Agency Transition Directors Council and engaged stakeholders

Throughout fiscal year 2020, OGE actively participated as a member of the executive branch-wide Agency Transition Directors Council and in collaboration with the Partnership for Public Service's Center for Presidential Transition. In addition, in coordination with OMB, GSA, OPM, DOJ, and the National Archives and Records Administration, OGE provided expertise and content for the Presidential Transition Directory and 6 and 3 month reports to Congress on election readiness. OGE presented to external stakeholders, congressional staff, and other interested parties about its preparations, and met with representatives of the major campaigns to provide resources, training, and support regarding the nominee review process, ethics proposals, and the *Integrity* electronic filing system.

Milestone: OGE met its milestone to actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth Presidential transitions per the activities described above.

Conducted internal and external election readiness training

OGE developed and implemented comprehensive transition-related training for OGE staff and ethics officials. Internally, OGE built capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition by drawing on cross-

functional professional staff, including recently filled vacancies, and implementing an intensive experiential learning plan over the year prior to the election.

OGE also developed and delivered training for agency ethics officials. Beginning with the National Government Ethics Summit in March 2020 and continuing through and beyond the election, OGE provided significant support to agency ethics officials to ensure that they are prepared for their enhanced responsibilities and the increased workload associated with the Presidential election.

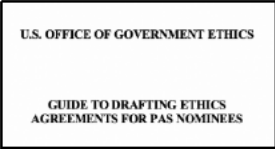

In addition, OGE trained and collaborated with a variety of external stakeholders. For example, because of its unique role, OGE provided training to Senate staff on OGE's role in the nomination process. OGE also regularly updated its stakeholders and the public on the progress made through these collaborations, through its quarterly meetings with ethics officials, [Twitter feed](#), and [website](#).

Training Related to Election Readiness

- Transparency and the Public Trust: The Disclosure of Ethics Records under the Ethics in Government Act
- Integrity 101
- Transparency and the Public Trust: The Disclosure of Ethics Records under the FOIA
- Advising Employees Who Want to Sell a Book Deal
- Ethics Concerns for Private Practice Attorneys Entering and Leaving Government
- Promoting an Ethical Culture: Setting the Tone
- New Employee Orientation—an “Agency Culture” Bootcamp
- Intersecting Perspectives: Post-Employment Counseling from Both Sides
- Journey to Nomination
- Integrity Best Practices & Integrity: Preparing for the 2020 Annual Filing Season/Integrity: Preparing for the 2020 Annual Filing Season
- Integrity Nominee Functionality
- Family Trusts and Public Financial Disclosure
- Analyzing Common and Complex Financial Interests
- Certificates of Divestiture
- Money on My Mind: An Introduction and Refresher to 18 U.S.C. § 208

Updated key resources

OGE updated and published the valuable resources described below:

Guide for Nominees	The Guide for Nominees is a resource for Presidentially appointed, Senate-confirmed (PAS) nominees. The Guide provides prospective and current Senate-confirmed Presidential appointees with information to help them lead our country with honor and integrity. The Guide explains the ethics rules and policies that apply before, during, and after they serve.	
Ethics Agreement Guide	The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements for PAS nominees.	
Transition Guide	The Transition Guide is a resource for the Presidential Transition Team to prepare for the upcoming transition so that top leadership positions can be filled quickly and free from conflicts of interest.	
Integrity User Guide	The Integrity User Guide provides instructions for using <i>Integrity</i> , the web-based system developed by the U.S. Office of Government Ethics (OGE) for Filers and Reviewers of executive branch public financial disclosure reports (OGE Form 278e and OGE Form 278-T).	

Milestone: OGE met its milestone to publish an updated Nominee Guide, Ethics Agreement Guide, and Transition Guide.

Reviewed Presidential candidate reports

In fiscal year 2020, OGE refined and updated its procedures for reviewing Presidential candidate reports. Using the new procedures, OGE closed and made available public financial disclosure [reports](#) of 55 individuals who declared their candidacy for the Office of the President of the United States.

Strategic Objective 3.2: Provide assistance to the President and the Senate in the Presidential appointment process

OGE provided assistance to the President and the Senate in the Presidential appointment process by conducting expert second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions. This helps to ensure that their potential conflicts of interest are identified and resolved so they can serve the public with integrity. Key highlights of OGE's work are described below.

Provided expert second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions

In fiscal year 2020, OGE continued to analyze and resolve potential conflicts of interest of the highest-level, incoming executive branch leaders. OGE's review of nominees' disclosures presented a critical opportunity to evaluate their financial interests for potential conflicts of interest and introduced top leaders to the importance of ethical leadership. In fiscal year 2020, OGE reviewed the reports of nominees for approximately twenty-four percent (24%) of the PAS positions. OGE cleared ninety percent (90%) of the nominee reports it received in fiscal year 2020.

Performance Goals: OGE exceeded both of its performance goals related to the nominee financial disclosure work. See the chart below for additional details.

	Target	Actual
Initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments are provided to the agency within established time frames.	85%	93%
Final financial disclosure reports of Presidential nominees for Senate-confirmed appointments are certified by OGE within seven calendar days of receipt from the agency.	90%	96%

Strategic Goal 4: Engage the public in overseeing government integrity

OGE's prevention mission requires engaging the public about the systems in place to detect and resolve conflicts of interest of their government leaders so that the public can hold its government accountable.

To achieve its strategic goal of engaging the public in overseeing government integrity, OGE has developed two strategic objectives: (4.1) inform the public about OGE and the executive branch ethics program, and (4.2) make ethics information publicly available.

Strategic Objective 4.1: Inform the public about OGE and the executive branch ethics program

OGE informed the public and other key stakeholders about OGE and the executive branch ethics program by completely overhauling its [website](#); providing relevant, understandable information through effective channels; collaborating with a broad array of citizens; and timely responding to requests for information and assistance. Key highlights of OGE's work are described below.

Completely redesigned OGE's main communication tool: its website

[OGE's website](#) is its main communication tool and most important resource for OGE's stakeholders, including agency officials, the media, and the general public. In fiscal year 2020, OGE launched a [completely redesigned website](#) which focuses on improving public access to ethics documents, ethics officials' access to key resources needed to perform their jobs, and compliance with new standards. OGE sought feedback from the public and other stakeholders in fiscal year 2019, and based on that feedback, prioritized improving the site's design and search functions.

Notable Improvements and Features

- Developed new navigation organized by user group (ethics officials, citizens/press, and federal employees).
- Streamlined the number of web pages to help users more quickly access the content they are seeking.
- Created three new document collections with significantly enhanced search and filters: (1) [Legal Research](#) (2) [Individuals Disclosures](#) (3) [Ethics Program Documents](#).

These document collections bring together previously disparate content into tables with advanced search capacities and filters that will enable users to more quickly find the information they seek and to gain new insights. For example, users can now sort each collection chronologically or filter for a particular agency or by document type.

- OGE added valuable new content. For example, OGE created a set of wholly new [web pages](#) that serve as a comprehensive guide to support ethics officials in managing effective ethics programs based on each program element.

Finally, in addition to these notable improvements to usability and content, OGE also worked to bring its website into compliance with accessibility, design, security, data, customization, and mobile requirements.

See page 36 for additional information about the posting of key ethics documents on OGE's website. *aa*

Provided relevant, understandable information through effective communication channels to enable the public to hold their government accountable

It is critical that the public have confidence in the impartiality of government decision-making. Therefore, OGE has a responsibility to communicate effectively about the ethics program to its stakeholders. OGE has a

wide spectrum of external stakeholders, ranging from the media and government watchdogs to its major federal partners and the public. OGE continued to create communications that were accurate, compelling, relevant, tailored to each targeted audience, and delivered through effective communication channels.

Using social media ([Twitter](#) and [YouTube](#)), OGE created content to help citizens understand the structure of the ethics program, learn how to access various ethics documents, and contribute to government accountability. For example, OGE used Twitter and YouTube to keep citizens informed about OGE's efforts to prepare the executive branch ethics program for the Presidential election and the increase in financial disclosure activity and interest that follows.



Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of page views of web pages targeted to the public on OGE's website (210,000), as well as OGE's Twitter engagement rate (1.14%).

Collaborated with and engaged a broad array of stakeholders

Ethics in government is a shared concern across all segments of society. OGE sees value in sponsoring public forums where diverse stakeholders can openly discuss ideas and share information to help inform OGE's efforts.

To share information and foster valuable collaboration, OGE continued to participate as a member of private sector, state, and local ethics organizations, such as the Council on Governmental Ethics Laws (COGEL) and the Association for Practical and

Professional Ethics (APPE), in addition to federal interagency groups. OGE also accepted speaking invitations to address its external audiences, including invitations from professional associations and international anti-corruption groups, to discuss topics including conflicts of interest, ethical leadership, and program management.

OGE also organized in-person meetings with ethics practitioners and the leadership of good governance and government watchdog groups in fiscal year 2020. These meetings created opportunities to collaborate and share resources and information that enhanced the executive branch ethics program.

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts conducted during the fiscal year. OGE conducted 12 outreach activities during the fiscal year.

Timely responded to external requests for information and assistance

OGE responded to a large volume of requests for information and assistance from its external stakeholders on topics such as conflicts of interest, enforcement, public financial disclosure, gifts from outside sources, and post-employment. In the instances when a request fell outside of OGE's jurisdiction, OGE made an effort to direct citizens to the appropriate resource.

In fiscal year 2020, OGE responded to approximately 200 requests for assistance from the press to support more accurate reporting about the ethics laws and regulations



OGE works every day to make sure that citizens have access to information about their government and its leaders. In recent years OGE has taken significant steps to improve citizens' access to ethics disclosures and related records.

and OGE's work. These interactions multiplied OGE's ability to reach the public to promote further understanding of the executive branch ethics program and its role in ensuring government integrity. OGE also responded to requests for assistance from other stakeholders, including more than 500 requests from private citizens. This engagement promoted

understanding of the executive branch ethics program and related ethics laws and regulations.

Performance Indicator: An indicator of OGE's success in expanding its outreach efforts is the number of requests from external stakeholders. In fiscal year 2020, OGE received approximately 750 requests from non-government, external stakeholders. This coverage helped the public understand the framework for government ethics in the executive branch.

Strategic Objective 4.2: Make ethics information publicly available

OGE made ethics information publicly available by timely posting documents online and administering a strong Freedom of Information Act program. Key highlights of OGE's work are described below.

Timely made ethics documents available online



In fiscal year 2020, OGE continued to timely make thousands of ethics documents available to the public on its [website](#). These documents included public financial disclosure reports and ethics agreements, program review reports on agency ethics programs, reports on payments for travel received from non-federal sources in connection with attendance of employees at certain meetings, and written policy guidance. As part of its website redesign, OGE made significant improvements to how citizens access ethics documents.

Each year, approximately 26,000 individuals file public financial disclosures across the more than 130 agencies, providing critical transparency to help the public hold its government accountable. To assist the press and public citizens to understand the process and timing of their release, OGE held a press call, published frequently asked questions, and updated its [ethics contact page](#) to include a point of contact at each agency for submitting document requests.

Of significance, in fiscal year 2020, OGE processed requests from the public and the news media to inspect nearly 7,000 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, Ethics Pledge waivers, and other covered records.

Lastly, as part of OGE's redesign effort, OGE significantly changed how the public can view, search, and filter a wide array of ethics documents on OGE's website. See page 36 for additional information.

Performance Goal: OGE exceeded its target to timely post eighty-five percent (85%) of ethics documents online within established time frames. Target: 85% | Actual: 100%

Administered a strong Freedom of Information Act (FOIA) program

Despite an extremely challenging FOIA workload and limited staff resources, OGE prioritized implementing FOIA guidelines by maintaining and updating its effective system



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On our FOIA page you can find out how to make a request, read documents that have been frequently requested, and see all the documents that have been released since January 1, 2017.
[oge.gov/Web/OGE.nsf/Fr ...](https://oge.gov/Web/OGE.nsf/Fr...)

for responding to FOIA requests, along with increasing proactive disclosures, utilizing technology, improving timeliness in responding to requests, and applying a presumption of openness in responding to requests. In fiscal year 2020, OGE significantly reduced the backlog of FOIA requests caused by a dramatic increase in FOIA requests in prior fiscal years. OGE has no full-time,

dedicated FOIA staff, and relies on five cross-functional staff with competing demands. Nevertheless, OGE was able to process many of its oldest and more complex requests to address the backlog, while keeping pace with the newer requests.

OGE also continues to conduct regular self-assessments of its FOIA processing procedures and response templates and, when appropriate, makes changes to increase efficiency, improve search processes, increase transparency, and otherwise improve the operation of OGE's already strong FOIA program.

Section IV – Managing for Results

This section describes OGE’s accomplishments related to its management objectives and the steps OGE has taken to maintain a culture of performance.

Management Objectives

OGE devotes significant resources toward sustaining a strong culture of performance management, strengthening organizational compliance and fiscal stewardship, and continuously enhancing its information systems and processes. These efforts are critical to OGE achieving its mission-focused strategic objectives. Organized by management objective, this section highlights major accomplishments that OGE achieved in fiscal year 2020.

Management Objective 5.1: Sustain a strong culture of performance management

OGE is committed to sustaining a strong culture of performance management by providing professional development opportunities and frequent internal communications.

OGE meets its employees’ professional development needs by providing significant educational opportunities and by dedicating time and resources. In fiscal year 2020, all OGE employees participated in the OGE Employee Development Plan (EDP) program. The EDP identifies specific formal training, mentoring, self-study, and/or on-the-job training activities that the employee will complete in the covered period. Significantly, the EDP also identifies objective measures for assessing the employee’s acquisition of the targeted knowledge or skills. In addition to these significant investments in internal opportunities for professional development, OGE supported its employees in enhancing their knowledge and skills by sponsoring their participation in external training programs. These programs included classes at Graduate School USA and the Treasury Executive Institute, as well as events hosted by the federal performance, legal, IT, and communications communities.

In fiscal year 2020, OGE also strengthened its culture of performance using a variety of internal communications methods. For example, OGE continued to conduct regular “all hands” meetings with the entire OGE staff to discuss progress toward meeting agency goals and to promote an understanding of OGE’s priorities and direction. OGE also held a mid-year Strategic Objective Review to review progress on each of the agency’s strategic objectives established by OGE’s strategic plans. This review informed OGE’s strategic decision-making, budget formulation, and near-term agency actions, as well as preparation of the Annual Performance Plan. In addition, the Director and Chief of Staff held quarterly program performance meetings, in addition to weekly executive and supervisory staff meetings to discuss agency goals, priorities, and the status of significant program activities. OGE also held supervisors accountable for ensuring ongoing communication regarding OGE’s goals and priorities with all staff.

Performance Goal: Due to the delay in the Federal Employee Viewpoint Survey, OGE is unable to report on its performance goal tied to the Employee Engagement Index score. Target: 80% | Actual: Data not available as of publication.

Continuously reviewed and improved OGE's operating procedures

In an effort to work smarter in fiscal year 2020, OGE continued to review its processes and procedures for ways to make improvements in programs that support the ethics community and OGE's internal operations. OGE continued to streamline and standardize internal processes. In fiscal year 2020, OGE developed or updated 20 standard operating procedures in each of its key program areas.

Performance Goal: OGE exceeded its performance goal to create or revise 4 standard operating procedures for key agency programs. Target: 4 | Actual: 20

Management Objective 5.2: Strengthen organizational compliance and fiscal stewardship

OGE carries out its value that public service is a public trust in its mission work and in the ways that it conducts its agency operations. OGE is a compliance organization that takes seriously its compliance with government-wide directives and their important policy objectives. For example, OGE ensured that its employees received required annual training in the following program areas: ethics, cybersecurity, privacy, records management, No FEAR Act, Hatch Act, and whistleblower protection. In fiscal year 2020, OGE also continued to safeguard privacy by strengthening its privacy program. OGE's efforts included updating its system of records notices, updating applicable Privacy Act statements on forms such as the OGE Form 278e, and updating key privacy policies and procedures.

Performance Goal: OGE met its goal for the number of employees that took required training (i.e., records management, cybersecurity, privacy, and ethics training). Target: 90% | Actual: 97%

Performance Goal: OGE met its performance goal of receiving an unqualified opinion on its annual financial report from an independent auditor.

Enhanced OGE's records management program

OGE continued to enhance its records management program in order to ensure agency records are available to the public and OGE staff, and to comply with records management requirements. This work included: conducting annual records management training, and onboarding new OGE employees; issuing records management guidance, including electronic records and email management guidance; conducting an inventory of agency records systems and repositories; updating agency-specific disposition schedules; and updating records file plans for each OGE division.

Enhanced OGE's privacy program

OGE's privacy program worked to ensure that the agency complies with the requirements of the Privacy Act and the executive branch privacy program requirements as established by OMB. This work included: reviewing new and proposed IT systems and projects that collect and manage privacy protected information and recertifying existing IT systems and projects; preparing and updating privacy related documents, such as Systems of Records Notices (SORNs) and Privacy Impact Assessments (PIAs); and consulting on simple and complex privacy issues as they arise. The Privacy Team reviewed and updated Privacy Controls that are required as part of the annual security reviews for OGE's network (OGEN) and *Integrity* and provided annual privacy training to OGE staff and contractors. OGE leveraged technology as described on page 36 to streamline the process for tracking systems requiring a privacy analysis. This reduces risk to the organization and individuals whose PII is contained within OGE documents.

Management Objective 5.3: Continuously enhance OGE's information systems and processes

OGE prioritized continuously enhancing and securing its information systems and processes, including OGE's executive branch-wide electronic filing system, *Integrity*, as well as numerous internal applications. OGE continued to increase the use of technology, enhance management practices, and strengthen compliance activities.

Maintained a resilient, stable, and secure IT infrastructure

OGE maintains a resilient, stable, and secure IT infrastructure necessary to conducting its mission-critical work every day. In fiscal year 2020, as OGE seamlessly pivoted to mandatory telework during the pandemic and virtual access was essential, the value of OGE's network was even more apparent. OGE was able to continue delivering its mission critical work because of its existing virtual capabilities and maintenance. For example, in its fiscal year 2020 IT refresh, OGE replaced desktop PCs with thin clients, adopting a Virtual Desktop Infrastructure (VDI). With VDI, OGE employees access the same virtual machine (VM) and the same network resources whether they authenticate to the network from any workspace in OGE's office location or from any approved telework location. Using secure OGE laptops via a Virtual Private Network (VPN) and 2-factor authentication via PIV cards, OGE was able to seamlessly transition to an all-remote workforce.

As potential security threats against automated systems grow and become more complex, OGE remained proactive to ensure that any threats are reduced and mitigated, if not eliminated. OGE upgraded its infrastructure to mitigate the risk of potential failure, to address evolving technology, and to prevent security breaches. Specifically, in fiscal year 2020, OGE completed IT updates necessary to maintain the security and efficiency of OGE's ongoing daily operations, including critical software updates and migrating to a Hyper-Converged Infrastructure (HCI), providing more scalability, memory, CPU power, storage,

and better performance with less hardware. Most notably, throughout the fiscal year, OGE ensured a safe and secure IT environment that protected the privacy and integrity of financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch as part of the financial disclosure review process.

Conducted an agency-wide cybersecurity risk assessment and mitigation plan

In fiscal year 2020, OGE undertook a complete assessment of the cybersecurity risks associated with the agency's network, website, and internal applications. OGE used the results of this assessment to develop mitigation strategies that are tracked and managed through a Plan of Action and Milestones (POAM) process. Also, in fiscal year 2020, OGE secured an independent, third-party review of its systems and efforts at mitigation to ensure OGE meets cybersecurity compliance targets.

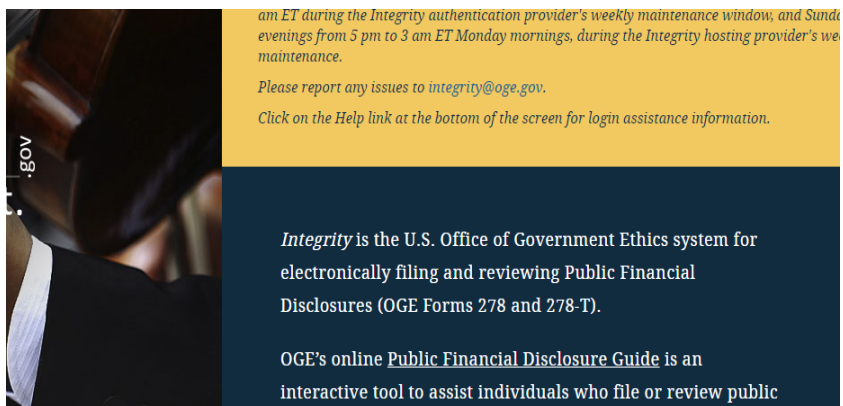
Performance Goal: OGE met its performance goal of managing risk for the majority of categories on the Cybersecurity Risk Management Assessment.

Successfully operated Integrity to review, analyze, and certify the financial disclosure reports of the highest-level Presidential appointees

In fiscal year 2020, OGE continued to successfully operate [Integrity](#), its executive branch-wide electronic public financial disclosure filing system, during a time of significant growth and demand. With approximately 24,000 public filers using the system, OGE focused on ensuring high-quality system operations and support for *Integrity*. In addition to helping incoming PAS nominees, many of whom had extremely complex financial disclosure filings, more accurately and easily complete their disclosures, the system enabled the executive branch to seamlessly continue the public financial disclosure process, despite the COVID-19 pandemic.

In addition to the system's benefit for filers, OGE continued to provide a high level of support for agency ethics program administrators and reviewers through its Help Desk services and online tools. OGE provided a comprehensive online user guide and on-demand video tutorials, as well as regular biweekly *Integrity* webinars during the annual filing season. In its annual user survey, 91% of agency administrators who responded ranked the *Integrity* support provided by OGE as very satisfactory or satisfactory.

OGE also continued to convene its *Integrity* Advisory Council in fiscal year 2020 to seek input from representatives of agencies with a large *Integrity* user community



am ET during the Integrity authentication provider's weekly maintenance window, and Sunday evenings from 5 pm to 3 am ET Monday mornings, during the Integrity hosting provider's maintenance.

Please report any issues to integrity@oge.gov.

Click on the Help link at the bottom of the screen for login assistance information.

Integrity is the U.S. Office of Government Ethics system for electronically filing and reviewing Public Financial Disclosures (OGE Forms 278 and 278-T).

OGE's online [Public Financial Disclosure Guide](#) is an interactive tool to assist individuals who file or review public

about recommended changes to the system. After considering this feedback, OGE determines how best to use available resources for *Integrity* enhancements.

Performance Goal: OGE met its goal related to the percentage of non-maintenance downtime of *Integrity*, OGE's network, and OGE's website. See the table below for additional information.

Performance Goal	Target	Actual
Percent of non-maintenance downtime of <i>Integrity</i> , OGE's network, and OGE's website.	<i>Integrity</i> = Establish Baseline Network and Website = <1.0%	<i>Integrity</i> Baseline = .27% Network and Website = .67%

Maintained and developed internal applications

In recent fiscal years, OGE developed and/or redesigned numerous internal applications that streamlined workflows for agency programs, made data more retrievable, enhanced management practices, and strengthened compliance activities. In fiscal year 2020, OGE devoted resources toward maintaining these various applications, which have become critical to agency operations. These applications support internal operations such as requisition, budget formulation, and equipment tracking, as well as major programs, such as the desk officer and financial disclosure programs. In addition, OGE developed several new applications including the Privacy Threshold Application, which enables the Privacy Team to more efficiently communicate with OGE staff about privacy requirements for new IT projects and procurements, and to annually recertify existing applications.