

From: [Nicole Stein](#)
To: [Shelley K. Finlayson](#)
Subject: Transition Guide
Date: Thursday, March 28, 2024 11:06:05 AM

Section 1:

I noticed that Deb added just a few comments and proposed edits to address her comments. Looks like they are on behalf of her and Heather. If you have time you may be able to review/accept them before the meeting next Monday.

I think there are a few editorial decisions that can be discussed at the meeting and then Section I should be ready for proofreading.

- Are we spelling out White House and Office of the Vice President or using acronyms. If acronym is it WHO or WH?
- Level of description in the milestone boxes

Section 2:

In the draft is also the latest version of Section 2. I've asked Dave for his final review and then it will be ready for your review.

Section 3:

Use the meeting to discuss if everyone agrees on structure and then ask everyone to review/propose edits by certain date.

Link to document: (b)(5) internal OGE network address

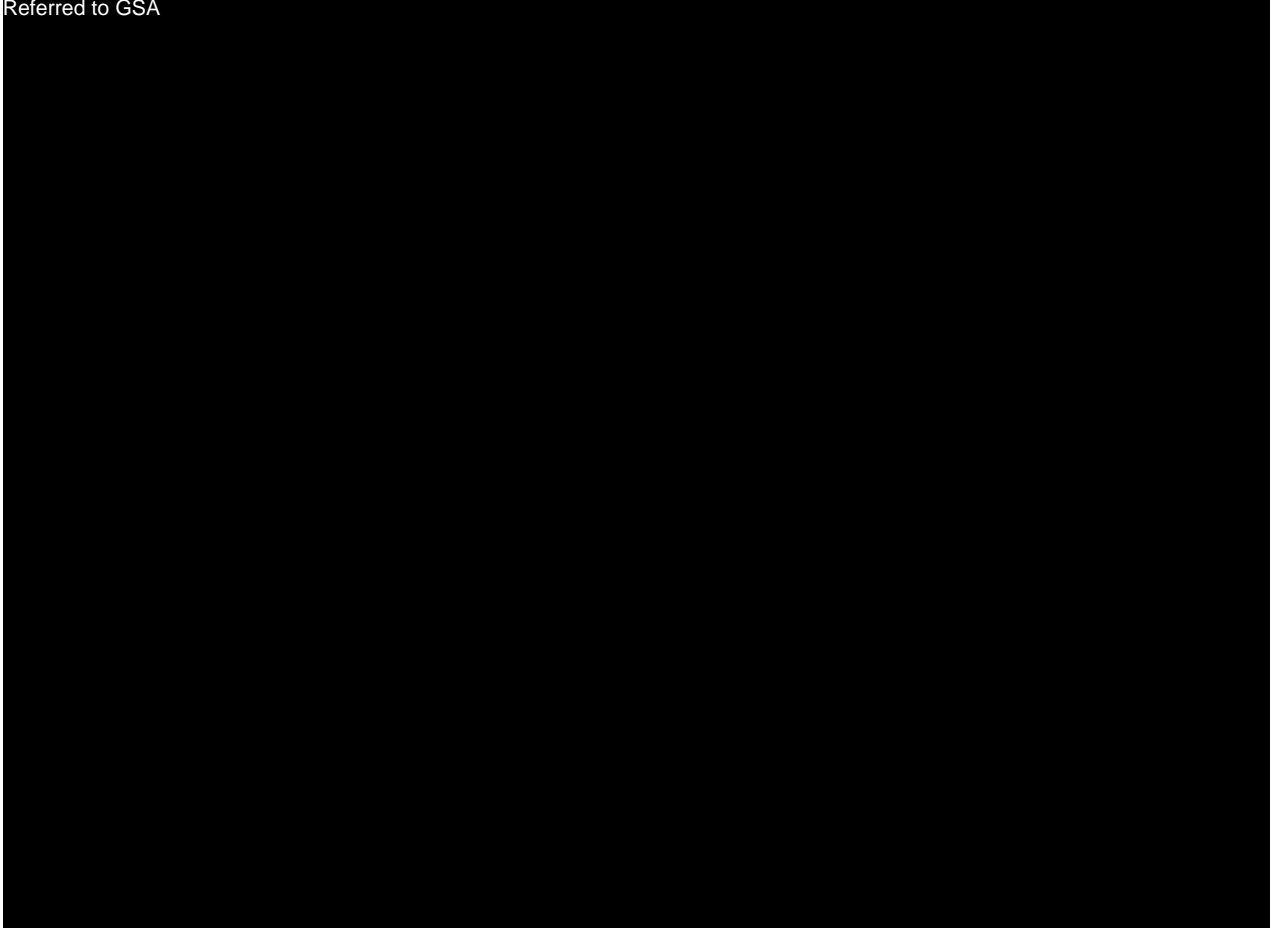
[REDACTED]

From: [Shelley K. Finlayson](#)
To: [Nicole Stein](#)
Subject: FW: ATDC: OGE input for the 6-month report to congress
Date: Thursday, March 7, 2024 10:59:13 AM
Attachments: [OGE - 2024 6-month report input.docx](#)
[NARA - 2024 6-month report input.docx](#)

Attachments referred to
GSA

Let's add this to our meeting later today

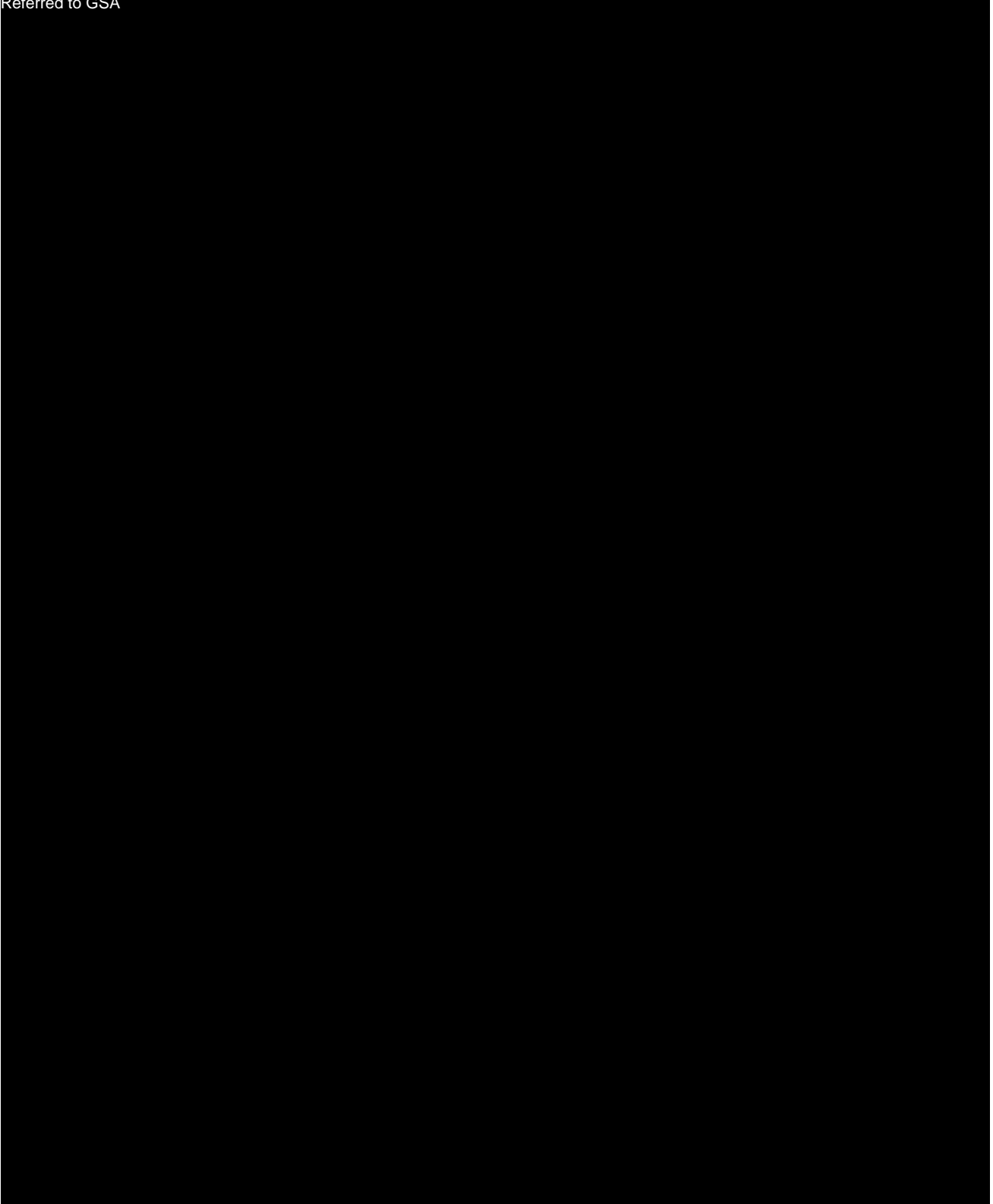
Referred to GSA



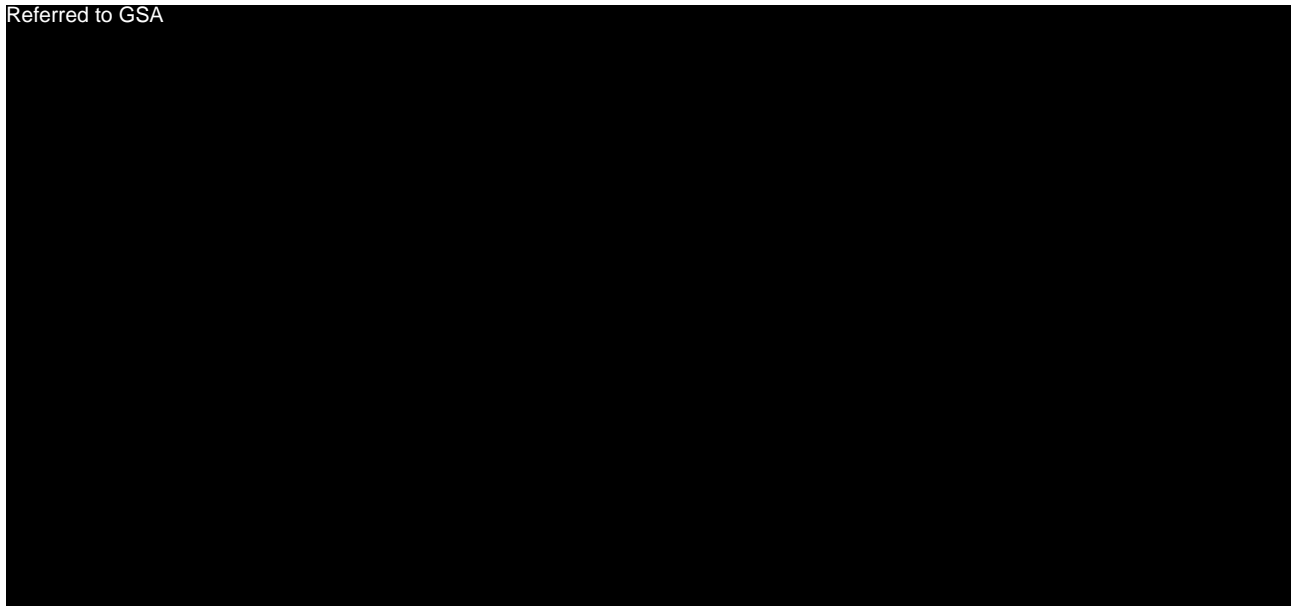
From: [Shelley K. Finlayson](#)
To: [Nicole Stein](#)
Subject: FW: ATDC Core Team Meeting Notes - DRAFT
Date: Thursday, March 28, 2024 8:01:18 AM
Attachments: [3.20.24 ATDC Core Team mtg NOTES.docx](#)

Attachment referred to GSA

Referred to GSA



Referred to GSA



From: [Grant Anderson](#)
To: [Gwen Cannon-Jenkins](#)
Cc: [Diana Veilleux](#); [Nicole Stein](#); [Shelley K. Finlayson](#); [Gilbert Carlson](#)
Subject: Budget Transmittal Email
Date: Thursday, March 7, 2024 4:46:51 PM
Attachments: [1. Transmittal Letter \(Committees\).pdf](#)
[2. OGE FY 2025 Budget Justification and Annual Performance Plan.pdf](#)
[3. OGE FY 2023 APR.pdf](#)
[Draft Email.docx](#)

1st, 3rd, and 4th attachments are nonresponsive records. The 2nd attachment follows.

Gwen,

For our budget transmittal to Congress on Monday, please see attached for the email to be sent from director@oge.gov and for the attachments. Diana or Nicole will let you know once we can send this on Monday. Thank you!

Best,

Grant

CONGRESSIONAL
BUDGET JUSTIFICATION,
ANNUAL
PERFORMANCE
PLAN



PREPARED FOR THE
COMMITTEES ON
APPROPRIATIONS

MARCH 2024

OGE
U.S. OFFICE OF
GOVERNMENT
ETHICS

FISCAL
YEAR
2025



MISSION

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

The American people expect honest government that works on their behalf, that is transparent, and that responds to the needs of everyday people. With strong leadership and cooperation, the U.S. Office of Government Ethics (OGE) can deliver for the American people, but not without focus and resources.

OGE works tirelessly with agencies across the executive branch to build and retain the public's trust. OGE's mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch is an essential component of the public's confidence in the integrity of executive branch programs and operations. This past year, OGE has taken steps to increase transparency, hold agencies accountable for compliant ethics programs, and make sure that government leaders have well-trained ethics officials to help them navigate their ethical responsibilities.

An investment in ethics, and in OGE, is an investment in government success. This plan is about the essential work OGE will do in the next two years, why that work is crucial to the country's success, and why OGE must be adequately resourced to be able to perform its unique and critical mission.

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UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – Budget Request Overview

Appropriations Language

OGE proposes the following appropriations language: “For necessary expenses to carry out functions of the U.S. Office of Government Ethics (OGE) pursuant to the Ethics in Government Act of 1978, the Ethics Reform Act of 1989, and the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act of 2012, including services as authorized by 5 U.S.C. 3109, rental of conference rooms in the District of Columbia and elsewhere, hire of passenger motor vehicles, and not to exceed \$1,500 for official reception and representation expenses, \$22,386,000.”

Budget Request Overview Narrative

In striving to carry out its vital mission work in a year of high demand, maintain exemplary financial stewardship of agency operations, and implement Administration priorities, OGE submits a requested funding level of \$22,386,000 for fiscal year 2025. This request is the minimum funding needed for OGE to carry out its important mission work in a Presidential election year, during which it will face increasing demand for its expertise and executive branchwide leadership.

Specifically, the requested \$22,386,000 will enable OGE to (1) maintain the well-trained and highly skilled workforce necessary for OGE to accomplish its core mission activities; (2) continue to operate *INTEGRITY* and ensure its continued accessibility, reliability, and security as well as OGE’s new network cloud operating environment; and (3) meet Administration priorities. Funding OGE at this level allows OGE to deliver its important mission work in a year in which demand and risk are both heightened. Without this funding, OGE would have to make draconian cuts to its programs and operations, which would have a negative impact on agencies and their missions across the entire executive branch.

BUDGET REQUEST

FISCAL YEAR 2025

FY25 REQUEST	\$22,386,000
(1) Cost Increases:	+ \$631,000
(a) Systems (<i>Integrity</i> & cloud)	+ \$587,000
(b) Administration priorities (Equity, DEIA, Services)	+ \$44,000
(2) Cost Reductions:	- \$1,282,000
(a) Office space (Rent)	- \$1,083,000
(b) Workforce	- \$199,000
NET Change	
From FY24 request (\$23M)	-\$651,000
From FY23 enacted (\$24.5M)	-\$2,114,000

OGE requires full funding to carry out its Executive Branchwide responsibilities, including in the Presidential appointments process following a Presidential election

The country is at its most vulnerable in the period immediately following a Presidential election. It is essential to the country's safety and security that the President be able to quickly nominate and appoint new leaders in executive branch agencies. It is vital that the Senate is timely assured by OGE that nominees can remedy potential conflicts of interest so they may exercise the full authorities of their positions, if confirmed. OGE is a micro agency with neither redundancy nor excess capacity. It requires fully resourced staff and systems in order to successfully undertake this work, in addition to its other significant statutory responsibilities.

OGE must be resourced to promulgate and maintain enforceable standards of ethical conduct for approximately 2.7 million employees in over 140 executive branch agencies and the White House; support the President and the Senate in the Presidential nominations process; oversee a financial disclosure system for more than 26,000 public and 390,000 confidential financial disclosure report filers; hold agency ethics programs accountable for complying with ethics laws and rules; provide expert advice and training to more than 5,000 ethics officials in the executive branch; and ensure transparency and engage the public in holding government accountable. OGE requires its full request to fund the human and system assets necessary to carry out this important mission work and keep pace with the increased demands for its services and systems.

The vast majority of OGE's budget request is always to fund OGE's most valuable asset—its staff—who work tirelessly to carry out the day-to-day work to accomplish the agency's vital mission of preventing conflicts of interest in the executive branch. OGE staff members are highly trained, cross-functional experts who each support multiple agency functions and responsibilities that directly impact every agency in the executive branch (see graphic below). OGE cannot accomplish any of its work without them.

In fiscal year 2025, OGE's expert staff will be in high demand across all of its mission responsibilities, especially OGE's unique role in the Presidential appointments process. They will be called upon to review for financial conflicts of interest and certify a greatly increased volume of public financial disclosure reports resulting from the 2024 Presidential election, regardless of the outcome. This work is especially critical when vacancies in senior leadership positions make the nation vulnerable to national security and other risks.

Examples of OGE's Cross-Functional Staff

	Legislative	Nominee Financial Disclosure Review	Annual Financial Disclosure Review	Int'l Outreach	Domestic Outreach	Training	Legal Policy and Advice	Agency Desk Officer	Program Review and Compliance	Agency Compliance and Internal Operations
Program Reviewer										
Attorney										
Ethics Specialist										

Continued investment in INTEGRITY, OGE's congressionally mandated electronic public financial disclosure filing system, is necessary to support the Presidential appointments process and appointment of senior leaders in the executive branch

OGE operates *INTEGRITY*, the electronic filing system necessary to the Presidential appointments process and public financial disclosure for the highest-level officials in the executive branch. Consistently receiving over 90% satisfaction rates, *INTEGRITY* is a secure, web-based system that OGE provides as a quality shared service at no cost to agencies, saving government resources, increasing efficiency, and decreasing duplication and fragmentation across the executive branch. In fiscal year 2025, the demands on the system will continue to increase due to the record number of filers (over 26,000) using the system and due to the cyclical turnover of high-level leadership positions in the executive branch that occurs following a Presidential election, regardless of the outcome. OGE must continue to invest in this congressionally mandated system that has revolutionized public financial disclosure filing – both by increasing accuracy through the use of wizards and by creating a seamless virtual review, routing, and signature process that has been particularly vital during a time of virtual, hybrid, and in-person work environments.

The costs to operate the *INTEGRITY* system will have a net increase of \$361,000 in fiscal year 2025 because of increased hosting costs (\$112,000), the potential costs associated with an anticipated transition from using MAX.gov authentication services to an undetermined provider (\$229,000), and increased costs for the system's annual, third-party security review (\$20,000). With regard to hosting, in fiscal year 2024, OGE moved its development and testing servers to a more secure government cloud, which has resulted in higher ongoing hosting costs. With regard to authentication, in fiscal year 2024 MAX.gov notified OGE that it could not guarantee it would provide authentication services for *INTEGRITY's* approximately 41,000 users beyond December 2024. As a result, OGE is currently searching for alternatives for its unique needs and has yet to find a provider that is able to authenticate both government employees and non-government individuals. Therefore, OGE must consider the more costly options of customizable solutions or using more than one authentication provider. This funding and timing is critical because all of

INTEGRITY's users will need to be transitioned to a new authentication provider(s) in time to be available for the Presidential election period and the increased demands associated with it that will occur in fiscal year 2025. Finally, OGE is facing increased costs for its annual security review due to increased requirements by the National Institute of Standards and Technology (NIST). The requested net increase of \$361,000 for *INTEGRITY* is necessary to permit this vital system that has become a bulwark of the executive branch financial disclosure program to continue to operate safely, securely, and efficiently.

OGE requires full funding to carry out the Administration's priority initiatives, including Organizational Performance, Secure Information Technology, and Equity/DEIA

Organizational Performance, Agency Work Environments, and Secure Information Technology: In order to continue to achieve outstanding agency performance, to provide meaningful in-person, virtual, and hybrid work environments for its staff, and to continue to maintain secure IT infrastructure, OGE must receive its requested funding.

OGE's budget request includes the cost of the tools, technologies, spaces, amenities, and strategies that OGE has outlined in its plan to further optimize its virtual, hybrid, and in-person work environment and ensure its continued success at carrying out OGE's important mission work. Specifically, OGE requires a net increase of \$226,000 over its fiscal year 2024 request to operate and maintain a secure, FedRAMP-certified government cloud environment that enables OGE to provide a robust, reliable, stable, and secure network for all OGE employees whether they are remote, hybrid, or in the office. Migrating to the cloud in fiscal year 2024 significantly improved OGE's network performance and accessibility, improved OGE's disaster recovery capabilities, and provided enhanced tools for agency employees. Funding at OGE's request level will allow the agency to continue to maintain IT security, advance toward more secure architecture, and maintain its use of secure cloud services.

OGE only requires this modest net increase in fiscal year 2025 because it has undertaken extraordinary measures to dramatically reduce operating expenses while ensuring its performance has continued to excel. These savings include major reductions in its rent cost (-\$1.321 million in savings over fiscal year 2023). OGE not only shrunk its headquarters office space by 70 percent, OGE backfilled an existing vacant federal space, which reduced its renovation and leasing costs and created savings and efficiency for the government overall. OGE also significantly reduced related operating expenses, including: printing costs by -\$25,000; supply costs by -\$11,000; commuter subsidy costs by -\$14,000; and communication/utility costs by -\$14,000. These examples highlight OGE's efforts to reduce overall expenses – all while continuing to meet or exceed its performance targets, including providing high-quality services to stakeholders.

Whole of Government DEIA (EO 14035) and Initiatives and Equity for Underserved Communities (EO 13985): To more fully and equitably serve its stakeholders, OGE requires modest additional budgetary resources, as well as its fully funded staff resources, to carry out this important work. For example, OGE requires its full requested funding to continue OGE's Mentorship Program (\$10,000), provide DEIA training for its staff (\$3,000), and fund translation services (\$10,000) for public-facing materials. With regard to accessibility, although OGE has improved the design and development of accessible websites and digital services, OGE also requires approximately \$10,000 in resources to more fully comply with Section 508 of the Rehabilitation Act of 1973. OGE's budget also prioritizes its executive branchwide DEIA initiative of removing barriers within the ethics profession through new education and training programs. The requested funding would enable OGE to leverage its expert, cross-functional staff to carry out its new certification programs for aspiring ethics officials, as well as continuing education for the more than 5,000 ethics officials who carry out the executive branch ethics program (see page 36). Finally, OGE also requires \$11,000 to continue to comply with human resource and other shared service provider requirements and cost increases.

Budget Request Conclusion

OGE respectfully requests fiscal year 2025 funding of \$22,386,000. This is the minimum funding needed to ensure that OGE can carry out its core functions and meet its important mission of preventing conflicts of interest in the executive branch during a Presidential election year. OGE's workload increases irrespective of the outcome of the election. In particular, in fiscal year 2025, OGE must resource all of its mission-critical functions. This includes the staff and systems necessary to ensure that the complex financial disclosure reports of Presidentially appointed, Senate-confirmed (PAS) nominees are properly reviewed to identify and resolve financial conflicts of interest, and promptly delivered to the U.S. Senate for consideration. This is necessary so that critical leadership vacancies may be filled. OGE must be resourced at \$22,386,000 to carry out its unique executive branchwide leadership, support, and oversight role that impacts every agency across the executive branch.

Budget Request by Object Classification

The object classification table set forth below summarizes OGE's request (in thousands of dollars).

Table: Budget Request by Object Classification (in 000s)

	<u>Object Class</u>	<u>2023 Enacted</u>	<u>2024 Request</u>	<u>2025 Request</u>
11.1	Salaries	\$11,356	\$12,244	\$12,258
12.1	Benefits	\$4,000	\$4,387	\$4,172
21.0	Travel	\$2	\$2	\$2
22.0	Transportation	\$1	\$2	\$2
23.1	Rent to GSA	\$1,664	\$1,426	\$343
23.3	Comms & Utilities	\$89	\$74	\$75
24.0	Printing (GPO)	\$32	\$17	\$7
25.0	Other Services	\$6,613	\$4,759	\$5,388
26.0	Supplies and Materials	\$54	\$42	\$43
31.00	Equipment	\$689	\$84	\$96
99.00	Subtotal	\$24,500	\$23,037	\$22,386
99.0	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
	Totals	\$25,225	\$23,762	\$23,111
FTEs		78	78	78

Section II – About U.S. Office of Government Ethics

OGE’s Mission

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.” As this statutory language makes clear, the primary objective of the executive branch ethics program is one of prevention.

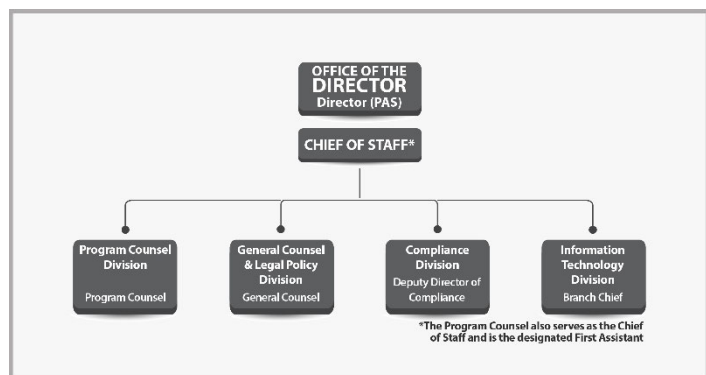
Under OGE’s leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 140 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public’s trust in government may be eroded.

Organizational Structure

Office of Government Ethics: A Small but Agile Agency

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five-year term by the President after confirmation by the Senate. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE’s career Chief of Staff and senior leadership, who work in concert to carry out OGE’s mission.



OGE and Executive Branch Agencies: A Shared Responsibility

Maintaining the trust of the citizens OGE serves is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of elements, including leadership

support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.

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



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

Further, OGE and ethics officials across the government are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigations of waste, fraud, and abuse; and criminal, civil, and administrative enforcement.

Section III – Fiscal Years 2024 and 2025 Performance Plan

OGE’s planned work reflects the agency’s commitment to fulfilling its vital mission of preventing conflicts of interest in the federal executive branch. Through this work, OGE strives to ensure the integrity of government programs and operations and to increase public confidence in the impartiality of government decision-making. OGE translates its important mission into strategic goals and objectives (see Figure 1). OGE then assesses its success in achieving these goals and objectives by measuring progress on its performance goals.

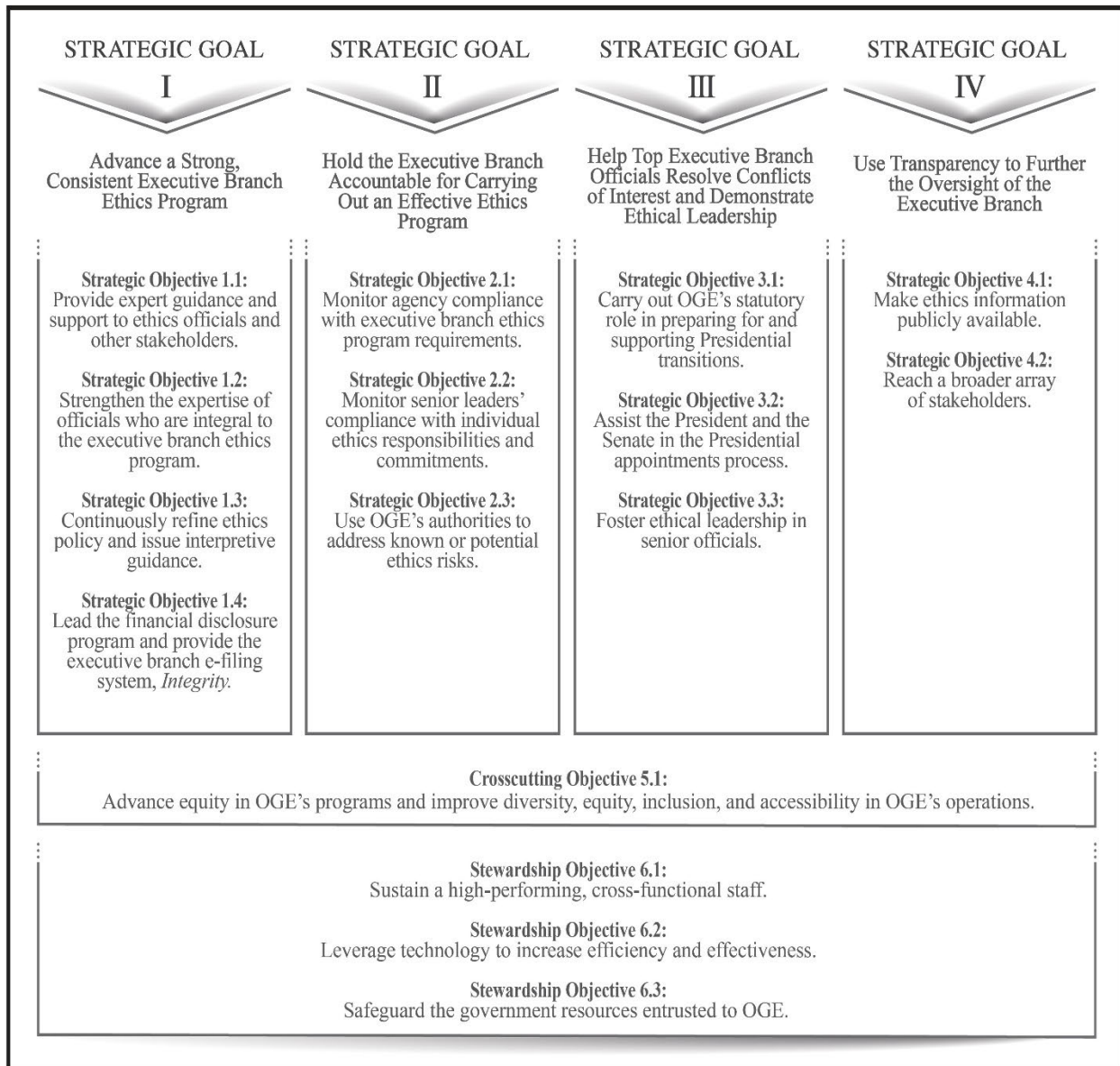


Figure 1: OGE’s Strategic Plan

Organized by strategic goal and objective, this section describes OGE's planned work for fiscal years 2024 and 2025. Information on how OGE will measure progress toward achieving its strategic goals can be found in Section V.

Priority Work

OGE's budget request directly supports OGE's mission-critical work, including providing direct support and training to ethics officials, refining and issuing guidance, conducting program reviews, reviewing public financial disclosures, and providing the public with access to a wide array of ethics documents.

Beyond its crucial ongoing work, OGE's priority in fiscal year 2025 is related to Election Readiness and Post-Election Workload – see page 27.

Significant External Factors

These external factors could cause OGE to incur costs, impede its mission, or necessitate reallocating staff resources.

- Potential Legislative Reform: OGE is the subject of significant and intense congressional and stakeholder interest. OGE is tracking and providing technical assistance to Congress on numerous bills that would make significant statutory revisions to the Ethics in Government Act or the criminal conflict of interest statutes, or create entirely new ethics-related statutes. Passage of major ethics reforms would present significant challenges for OGE, and in some cases would require OGE to take on significant new responsibilities without funding for additional staff or other resources.
- IT Threats: With a hybrid workforce, the availability of OGE's virtual network is more critical than ever, and any unscheduled downtime has an even greater impact on operations. As potential security threats against automated systems grow and become more complex, OGE must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated.
 - OGE has taken a number of steps to secure its IT systems, including: undergoing independent, third-party assessments; complying with key government-wide directives; and leveraging both internal and external expertise and resources. OGE will continue to address IT security threats and to commit significant resources to secure its important IT systems and network. OGE will also seek, despite its small staff and limited resources, to remain responsive and compliant to new cybersecurity directives. In addition, OGE recently implemented a comprehensive replacement of its IT infrastructure through procuring new equipment and by migrating to a secure, FedRAMP-certified government cloud environment.

- Transition from MAX.gov for INTEGRITY Support Functions and Authentication: In addition to continuing to resource *INTEGRITY* on behalf of the entire executive branch ethics program, OGE must move system support functions to new providers because OMB's MAX.gov will no longer operate. The full impact of this transition will require as-yet-unknown total costs, because an alternative solution to the system's unique authentication requirements has yet to be identified. OGE has migrated other services provided by MAX.gov to new providers; however, OGE's ability to continue to secure, operate, enhance, and update the system, with a very small contingent of staff and a small agency budget, and to continue to provide the system to all agencies at no cost, may be affected by this transition. In addition, the system may be vulnerable to disruption during the Presidential election year period if a cost-effective solution cannot be identified.
- Inflation, Workload, and Unfunded Mandates: OGE produces a remarkable amount with a small staff by carefully managing the cyclical nature of the agency's work and leveraging its highly cross-functional professional employees. Although agile, significant unanticipated changes in workload have impacts across programs, as do the pressures of large inflationary increases in costs for services that OGE must use. For example, OGE is required to use the services of certain other agencies, such as the Federal Protective Service, and has no control over those costs. In addition, OGE does not drive its own workload. For example, a dramatic increase in public, press, congressional, and FOIA requests in 2017 strained staff resources, stretched cross-functional abilities, and required additional cross-training to keep pace with unprecedented demands.
 - There are also ongoing and growing compliance requirements that must be addressed with no lead time or new resources to support them, such as unanticipated human resources, privacy, and data-focused executive orders, OMB directives, laws, and regulations.

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

OGE was created to prevent conflicts of interest on the part of executive branch employees. The absence of a strong, consistent executive branch ethics program with clear rules, guidance, support, training, and financial disclosure could lead to ethical lapses, improper use of taxpayer funds, and a loss of public confidence in government.

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

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

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

OGE provides expert guidance and support to ethics officials and other stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. In fiscal years 2024 and 2025, OGE will continue to provide quality Desk Officer services and effective assistance to a wide variety of key stakeholders, including Congress and Inspectors General. OGE will also continue to disseminate relevant information and create opportunities for ethics practitioners to engage with OGE and each other. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

- OGE will be unable to respond to pressing questions timely, leaving agency employees and leaders without protection from ethics risks.
- OGE will be unable to consult with Inspectors General, delaying investigations while ethics violators remain in positions of public trust.
- OGE will be unable to support the U.S. State Department's global anti-corruption efforts.

Supply ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agencies' leaders and employees

OGE will continue to provide extensive support to agency ethics officials so they can provide consistent and effective ethics guidance to the more than 2.7 million federal employees in the executive branch who serve the American people. This support includes providing timely, expert advice on applying the ethics laws and regulations, as well as furnishing other resources ethics practitioners need to do their jobs effectively. On average, OGE Desk Officers respond to 1,200 calls for assistance per year (see page 17).

Desk Officers help ethics officials navigate difficult policy and programmatic issues and proactively provide those officials with resources and services to assist them.

Communicate helpful, written guidance that is disseminated widely

OGE will continue to provide ethics officials with up-to-date ethics information so that they can carry out effective programs for the employees they serve. OGE publishes advisories and other guidance in a searchable



format on its website and provides notices of new guidance via the OGE listserv, which reaches approximately 3,500 ethics officials and ethics support staff. OGE also continues to host quarterly meetings with senior agency ethics officials to inform them of new guidance, resources, requirements, and trends.

Respond to requests for expert advice from critical stakeholders

OGE continues to provide ethics expertise in response to requests from a variety of external stakeholders, such as Congress, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, consistent understanding of the executive branch ethics program.

Support the vital work of the ethics enforcement communities



OGE continues to support the vital work of the ethics enforcement communities, including Inspectors General, the Department of Justice, and executive branch employee relations personnel, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules. OGE responds to numerous requests for expert consultations from offices of the Inspectors General. OGE also participates actively as a member of the Council of Inspectors General on Integrity and Efficiency (CIGIE). Information on the training OGE provides to the enforcement communities is described on page 16.

Participate actively in U.S. government anti-corruption efforts

To support and enhance U.S. foreign policy initiatives, OGE continues to provide its expertise to international anti-corruption and good governance programs at the request of U.S. foreign policy agencies. OGE also continues to assist the State Department by providing information about U.S. implementation of ethics and good governance programs to foreign delegations. For example, OGE will participate in the Group of States against Corruption

(GRECO) review of the United States ethics program. On average, OGE each year provides dozens of these briefings to individuals from countries across the globe.

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

OGE seeks to strengthen the expertise of all officials who are integral to carrying out an effective executive branch ethics program, including ethics officials, agency leaders, Inspectors General, and human capital (HR) professionals. Without competent ethics officials, engaged leaders, informed investigators, and collaborative HR officials, the ethics program cannot succeed in implementing a consistent program that helps executive branch agencies mitigate risk. In fiscal years 2024 and 2025, OGE will offer an array of professional development initiatives for ethics officials, promote ethical leadership, and provide training to support an ethical workforce. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

- OGE will be unable to carry out its responsibility to build the expertise needed to carry out the ethics program.
- OGE will be unable to offer training and other supportive programs to new ethics officials, leaving agencies without competent counsel.
- OGE will be unable to deliver orientations for newly designated agency ethics officials, leaving senior ethics officials without guidance needed to successfully lead their programs, placing the ethics program at risk.

Develop senior ethics officials (Designated Agency Ethics Officials (DAEOS) & Alternate Designated Agency Ethics Officials (ADAEOs)) so that they have the skills and knowledge to lead effective ethics programs

To promote consistent implementation of agency ethics programs, OGE will continue to provide orientations for new agency ethics leaders (DAEOs and ADAEOs). These orientations result in DAEOs and ADAEOs understanding their roles as advocates for the ethics program and the regulatory requirements of their new positions, as well as ways that OGE can support their programs.

Prepare ethics officials at all levels to train, advise, and support their employees and further their agencies' missions

OGE's wide array of offerings provide a flexible approach to ethics officials' professional development and are designed to:

- assist new and aspiring ethics officials to navigate rewarding career paths;
- help experienced ethics officials maintain and sharpen their skills, and remain engaged with OGE and the ethics community; and

- support ethics program leaders to direct ethics programs that protect their agencies; hire, support, and develop the next generation of ethics officials; and lead innovative ethics programs that protect the trust of the public we serve.

These offerings include:

ACE: OGE developed ACE for new and aspiring ethics officials who would like to be able to support all aspects of an executive branch ethics program. Over four months, the virtual program will provide a comprehensive introduction to all aspects of the ethics program, including program administration and leadership, advice and counsel, financial disclosure, education, and strategic communication.

Skill Builders: OGE developed Skill Builders for ethics officials and others who support the ethics program in a targeted way and would like to build their skills in a particular program area or add to their ethics competencies over time. OGE will offer several Skill Builders each year on topics such as confidential financial disclosure, public financial disclosure, nominee financial disclosure, advice and counsel, program management, strategic communication, and education.



Annual PEP Certificate: OGE designed the annual PEP certificate for ethics officials who are performing some or all functions of an ethics program at full competency and who wish to

maintain their skills and stay current with policy changes and developing practices in the ethics profession. By offering an annual certificate, OGE intends to signal an expectation of ongoing professional development by ethics officials, and participation enables ethics officials to demonstrate their commitment to the practice of ethics. OGE will hold a variety of PEP offerings each year, such as virtual lectures on recent advisories, peer-to-peer and other workshops, networking opportunities, community meetings, and recorded and interactive trainings on a wide range of ethics topics.

National Government Ethics Summit on Election Readiness: Throughout fiscal year 2024 and into fiscal year 2025, OGE will provide a wide array of professional development offerings to help ensure ethics officials are prepared for their enhanced responsibilities and the increased workload associated with a Presidential election. See page 28 for a more detailed discussion of OGE’s election readiness efforts, including professional development.

In addition, OGE will continue to support the development of ethics officials through its [Institute for Ethics in Government Education Library \(IEG Library\)](#). OGE’s virtual library is publicly available and includes more than 100 education resources designed for use by ethics officials, including recordings of training presentations, as well as job aids, which can

be searched and sorted by topic, type, and complexity. In fiscal year 2024, OGE will begin the process of redesigning the IEG Library with a focus on improving user experience, including a more robust search functionality.

Create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies



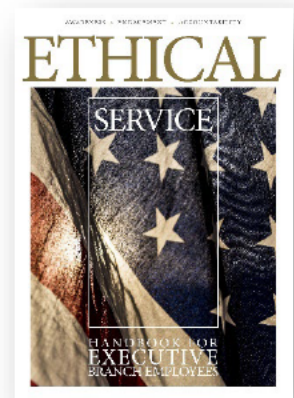
OGE will continue to create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies. For example, OGE holds workshops for ethics officials to discuss practices for implementing different aspects of their program. In addition, OGE will continue to hold monthly flash networking events to provide ethics officials with an opportunity to build their professional development.

In fiscal year 2024, OGE will launch a mentorship program for ethics officials. OGE will continue to implement the program in fiscal year 2025. This program is in direct support of OGE's DEIA efforts.

Improve the delivery and content of ethics education at agencies, including a focus on equity

As part of OGE's Diversity, Equity, Inclusion, and Access (DEIA) efforts, OGE will continue to share resources, through presentations and/or written guidance, with ethics officials on how to incorporate DEIA principles into the delivery of ethics education to their agencies' federal employees. OGE will also hold interactive workshops for ethics officials so they can implement the principles they have learned into the training they will deliver to their employees and receive feedback from their peers.

OGE recognizes that maintaining strong ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. To support the ethical service of all executive branch employees, OGE maintains a collection of training resources for new and current federal employees, including templates for ethics officials to use when communicating about ethics within their organizations. OGE will also continue to identify and leverage opportunities to directly discuss ethical standards with groups of federal employees.



Educate other officials who are integral to the executive branch ethics program



In support of OGE's goal of a strong, consistent ethics program, OGE will continue to train and collaborate with members of the ethics enforcement and human capital communities. Without knowledgeable enforcement communities the ethics laws may not be effectively enforced. Therefore, OGE

will continue to provide training as part of the Inspector General Criminal Investigator Academy's Public Corruption Investigations Training Program and to present at meetings of the Council of Counsels to the Inspectors General.

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

OGE is responsible for interpreting the statutes and rules that form the building blocks of the executive branch ethics program, including the criminal conflict of interest laws and Standards of Ethical Conduct for Employees of the Executive Branch, and must act to keep pace with evolving challenges to the consistency and strength of the program. In fiscal years 2024 and 2025, OGE will continue to review, refine, and issue interpretive guidance on the ethics rules to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

- OGE will be unable to issue guidance, particularly on new and evolving ethics issues, creating risk and resulting in inconsistency and confusion across the executive branch on ethics policies.
- OGE will be unable to timely update ethics regulations, leaving outdated and less effective rules in place and delaying reforms that would improve ethics policies.

Provide timely ethics guidance

In fiscal years 2024 and 2025, OGE plans to issue legal advisories implementing the new legal expense fund regulatory program. In addition, OGE plans to issue advisories providing interpretive guidance on emerging issues in the application of conflict of interest laws as they apply to an employee's holdings of virtual assets. OGE also anticipates issuing expanded guidance on employees' use of personal social media accounts, further guidance on the nominee financial disclosure program, election readiness, and financial conflicts of interest, as well as OGE's annual prosecution survey. Finally, OGE will be ready, if necessary, to issue further interpretive guidance on Executive Order 13989, "*Executive Order on Ethics Commitments by Executive Branch Personnel*" or any other ethics executive order issued by the administration.

OGE will continue to seek feedback from agency ethics officials prior to issuing guidance, to ensure the usefulness and clarity of the guidance, and to use an evidence-based approach to determine topics to be addressed. OGE will use its listserv, website, desk officer services, and training broadcasts to ensure its guidance is widely disseminated.

Publish proposed and final ethics rules

In fiscal years 2024 and 2025, OGE will continue to review and refine the ethics rules to ensure their continued relevance, consistency, and effectiveness by publishing proposed and final ethics rules. For example, OGE expects to modernize the Standards of Ethical Conduct for Employees of the Executive Branch (the Standards) by publishing a final rule in fiscal year 2024. The rule will update the Standards based on OGE's experience gained from application of the regulation since its inception, as well as based on the principles contained in Executive Order 14035 to advance equity. The rule will incorporate past interpretive guidance, add and update regulatory examples to make them more inclusive, improve clarity, update citations, and make technical corrections.

In fiscal year 2023, OGE continued its review of comments on planned revisions to 5 CFR part 2640 from over 100 agency ethics officials and its in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions. In fiscal year 2024, OGE plans to submit to OMB a proposed rule amending the regulatory exemptions at 5 CFR part 2640. The planned amendments will provide more clearly delineated exemptions with more efficient implementation. In addition, the exemptions will be targeted to better address potentially conflicting financial interests.

In fiscal year 2023, OGE published a final legal expense fund regulation and in fiscal year 2024, OGE plans to establish the program implementing this new regulatory requirement for employees who accept gifts of legal expenses arising from their official duties. The implementation of this new program will include, among other things, a series of trainings for agency ethics officials, the publication of a handbook for fund trustees, as well as the publication of sample documents that may be used to establish an employee legal expense fund.

In fiscal years 2024 and 2025, OGE will continue to consult with agencies that seek to publish agency-specific supplemental ethics regulations. Supplemental ethics regulations enable agencies to tailor their ethics program requirements to meet specific agency needs. In fiscal year 2024, OGE plans to issue a final regulation updating agency component designations for the purposes of the post-employment restrictions applicable to senior employees under 18 USC section 207(c).

Lastly, in both fiscal year 2024 and 2025, OGE will issue a final regulation increasing the civil monetary penalties applicable to employees who violate certain financial disclosure, qualified trust, or outside employment laws under OGE's jurisdiction.

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

OGE leads the executive branchwide public and confidential financial disclosure systems that serve to prevent conflicts of interest through a systematic review of the financial interests of both current and prospective employees. In fiscal years 2024 and 2025, OGE will operate *INTEGRITY*, renew financial disclosure forms, review key financial disclosure regulations, and maintain related resources. Key highlights of OGE's planned work are described below.

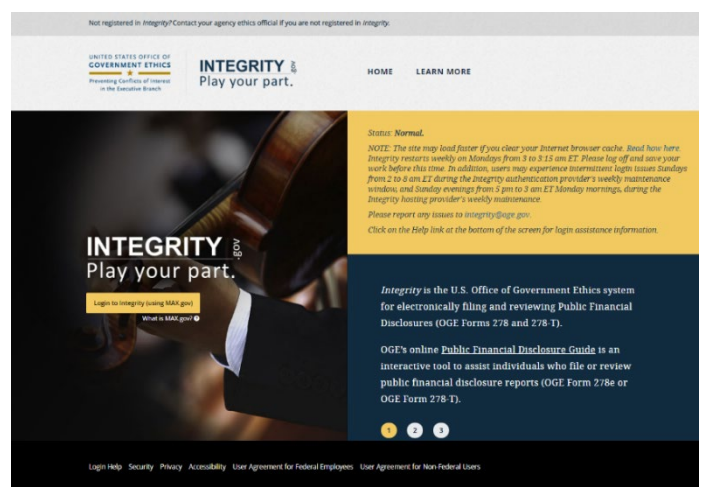
Operate INTEGRITY, OGE's public filing system that serves more than 90% of all public filers

In fiscal year 2024 and 2025, OGE will work to ensure that *INTEGRITY* can sustain a potential increase in the number and complexity of filings of nominees using the system during the post-election period and continue to produce high-quality financial disclosures by helping filers more accurately report required information. OGE will also work to ensure that *INTEGRITY* continues to reliably and securely operate for the tens of thousands of current filers and reviewers who rely on the web-based system every year at no cost. In fiscal year 2024 and 2025, OGE will also provide support on *INTEGRITY* to the Presidential campaigns (see page 28 for more information).

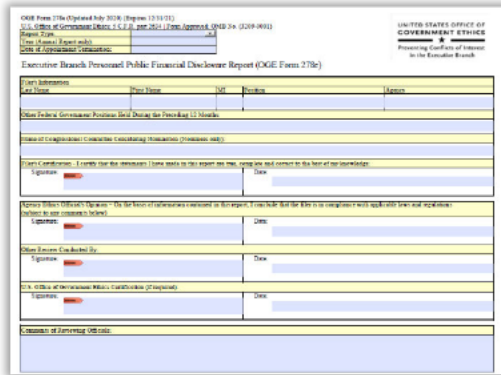
In addition, OGE will continue providing high-quality support for users and agencies by convening *INTEGRITY* Advisory Council meetings to provide a forum for agencies to discuss and prioritize enhancements to the system. To support the system's more than 39,000 users (filers, administrators, and reviewers), OGE will also continue to make available training resources and tutorials and provide regular training opportunities for both new and experienced users. Lastly, OGE will continue to provide centralized, real-time help desk services and on-demand resources to system users.

Without its Full Appropriation

- OGE will be unable to operate its electronic financial disclosure filing system, resulting in more than 26,000 senior officials reverting to less efficient and less accurate paper filing of financial disclosure reports, significant delays in review and certification, and unresolved conflicts of interest left unidentified and unaddressed.
- OGE will be unable to effectively assist the President and Senate in the Presidential appointment process.



Maintain and update uniform ethics forms



OGE is responsible for maintaining uniform public (OGE Form 278e) and confidential (OGE Form 450) ethics forms for use across the executive branch. To carry out this responsibility, OGE conducts periodic reviews and makes, proposed revisions based on robust solicitation of stakeholder input prior to requesting renewal of an existing form or creation of a new form. In fiscal year 2024, OGE will review both the public and confidential financial disclosure forms as well as its Fast Track Authority and the Model Trust form.

OGE will seek approval for renewal of all of these forms from OMB in fiscal years 2024 and 2025.

Make available guidance on confidential and public financial disclosure programs and reporting requirements

In fiscal year 2024, OGE will publish updated versions of the two key financial disclosure resources, the Public and Confidential Financial Disclosure Guides. The Guides are interactive tools to assist individuals who file or review either the public financial disclosure (OGE Form 278e) or the confidential financial disclosure (OGE Form 450). OGE will also continue to provide targeted training, as well as workshops for individuals with a role in the public and confidential financial disclosure systems.

Evaluate and respond to requests from agencies to use alternative financial disclosure forms

In fiscal years 2024 and 2025, OGE will continue to evaluate and respond to requests from agencies to use alternative financial disclosure forms. Because of special or unique agency circumstances, the alternative procedure approval process is intended to provide an agency with the most effective tools possible for preventing and detecting conflicts of interest. For example, an agency may have separate authority to collect information under OGE-approved supplemental ethics regulations or specific statutory authority.

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 that each of the more than 140 executive agencies has a compliant ethics program and that senior leaders comply with their ethical commitments. OGE's work in this area is vital because when an ethics program fails or a senior leader fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

To achieve its strategic goal of holding the executive branch accountable for carrying out an effective ethics program, OGE has developed three strategic objectives. These objectives are:

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

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

The executive branch ethics program is decentralized, and its success relies on each agency implementing the ethics program requirements established by OGE. OGE regularly conducts oversight of agency compliance with these requirements in order to mitigate ethics program vulnerabilities at each agency and to identify executive branchwide trends. Without this oversight, systemic problems may multiply and result in ethics program failures. In fiscal years 2024 and 2025, OGE will continue to conduct reviews of agency ethics programs and collect data about each agency's program and the overall executive branch ethics program. OGE also will continue to request ethics program data from agencies to address, in real time, issues that require oversight. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

- OGE will be unable to conduct its oversight function.
- OGE will be unable to ensure that agencies are maintaining compliant ethics programs, leaving systemic problems unaddressed and agency programs vulnerable to ethical lapses and scandal.

Identify program weaknesses (non-compliance) with ethics program requirements on an accelerated review cycle

OGE conducts agency ethics program reviews as a key part of its strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch. In fiscal years 2024 and 2025, OGE will continue to review agencies on a three-year or four-year risk-based review cycle. This risk-based approach uses data and stakeholder feedback to assist in identifying agencies and specific issues to review.



OGE reviews agency programs to identify and report on the strengths and weaknesses of the programs by evaluating (1) agency compliance with ethics requirements established in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. Cabinet agencies and other agencies determined to be at high risk, based on OGE’s risk assessment, are reviewed every three years. Other agencies are reviewed at least once every four years. If needed, OGE will also conduct real-time consultations and other compliance-based interventions.

OGE examines all elements of an agency ethics program, including: program administration; financial disclosure; education and training; ethics counseling; agency-specific ethics rules on outside employment; conflict remedies; enforcement; and special government employees. OGE conducts follow-up reviews to evaluate agencies’ progress in implementing any recommendations made in OGE’s program review reports. To enhance transparency and accountability, OGE continues to publish all program reviews and follow-up program reviews on its website.

Collect, evaluate, publish, and act on ethics program data

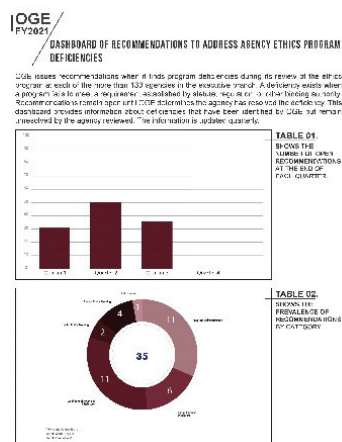


As part of OGE’s oversight role, agencies are statutorily required to submit annual reports to OGE. OGE collects the data through its Annual Agency Ethics Program Questionnaire. In fiscal years 2024 and 2025, OGE will continue to seek 100 percent agency compliance with this requirement and to rigorously review agency responses. OGE will continue to build capacity to analyze trend data to identify areas of concern at individual agencies and across the executive branch. In fiscal years 2024 and 2025, OGE also will continue its practice of publishing a summary report of the aggregate data and posting individual agency responses on its website to increase transparency and oversight. Lastly, OGE will continue to use the data to provide training on the results, and to encourage agencies to use the

questionnaire, both as a self-assessment tool and to benchmark their own agency against similarly situated agencies.

OGE also continues to serve as the repository for biannual reports (1353 Travel Reports) that document payments of travel accepted from non-federal sources. Although OGE has no role in providing guidance on the travel regulations, OGE makes these reports available as required by statute.

Collect, analyze, and publish information on potential ethics violations by executive branch employees



Agencies are required to concurrently notify OGE’s Director when referring any matter to the Department of Justice involving a potential violation of a criminal conflict of interest law by an executive branch employee. OGE tracks and follows up on these referrals to ensure that agencies are considering disciplinary or other corrective action in the event prosecution is declined. While OGE primarily works to give the public reasons to trust their government, OGE also acknowledges when officials violate that trust. For example, OGE annually publishes a survey of ethics-related prosecutions, which shows the consequences for failing to abide by the ethics laws. In fiscal years 2024 and 2025, OGE will continue to post quarterly dashboards displaying information regarding

referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.

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

OGE monitors senior leaders’ compliance with their individual ethics commitments to confirm that they keep the promises they made when entering government and continue to serve impartially throughout their government service.

Without this oversight, the public cannot be certain that government leaders are acting in their interest. In

fiscal years 2024 and 2025, OGE will continue to monitor agency leaders’ compliance with

Without its Full Appropriation

- OGE will be unable to ensure that senior leaders have timely complied with their ethics commitments, decreasing public confidence that their decision making is in the best interest of the government and is not being driven by their personal financial interests.
- OGE will be unable to timely review and certify public financial disclosure reports, leaving potential conflicts of interest unaddressed and leaders vulnerable to inadvertent criminal violations.

their ethics commitments and provide a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's planned work are described below.

Collect and publish documentation of senior agency leaders' compliance with their individual ethics commitments

CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE Senate Confirmed Presidential Appointees		
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 partial 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):
4. Managed Accounts	I/We have a managed account or use the services of an investment professional. I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Intentional Defaults	I complied with my interim moral obligations pending the divestitures required by my ethics agreement.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

OGE continues its efforts to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office, by collecting a Certification of Ethics Agreement Compliance from each appointee. This Certification requires each appointee to personally attest that they have complied with the terms of their ethics agreement. In support of transparency and accountability, OGE will continue to post these certifications, as well as notices of late compliance and extensions, on its website. In the event that a PAS official is more than 30 days late in submitting their Certification or submits a Certification that indicates a substantive deficiency in complying with the terms of their ethics agreement, OGE will notify the Senate committee of jurisdiction, as appropriate.

Conduct expert, second-level reviews of senior agency leaders' financial disclosure reports

OGE will continue to collect and review the periodic transaction, annual, and termination reports of PAS filers to ensure that filers continue to comply with their ethics agreements and that agencies timely review these disclosures for conflicts of interest. In fiscal year 2023, OGE closed nearly 1,900 reports. In fiscal year 2025, based on OGE's data, this number is expected to increase, irrespective of the outcome of the Presidential election, due to the expected departures of PAS nominees following the election. OGE will continue to provide each agency head with a year-end status letter regarding their agency's compliance with financial disclosure responsibilities under the Ethics in Government Act, including the requirement to timely submit reports to OGE and to promptly provide any additional information necessary for OGE to certify the reports. Lastly, OGE will continue to provide the public with timely access to these disclosures on its website, as described on page 33.

Analyze, respond to requests for Certificates of Divestiture, and make available to the public those Certificates of Divestiture approved/issued by OGE

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 employees may be eligible for a Certificate of Divestiture (CD). A CD allows an eligible

person to defer paying capital gains taxes on property that is sold to comply with conflict of interest requirements. OGE continues to review, on average, 150 requests for CDs each year and to make those issued available electronically through the Request an Individual's Ethics Document (OGE Form 201) process.

Consult with agencies on waivers for their employees 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, prohibits employees from participating in certain government matters affecting their own financial interests or the interests of certain persons with whom they have ties outside the government. In some cases, a waiver to these restrictions may be appropriate if the financial interest is “not so substantial as to be deemed likely to affect the integrity of the services which the government may expect from such officer or employee.” Lastly, OGE will continue to consult with agencies prior to the issuance of such waivers and collect copies of final waivers.

Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks

Although limited by statute,¹ OGE uses its authorities and oversight role to address known or potential ethics risks that come to its attention. Without OGE’s inquiry and intervention, ethics vulnerabilities may go unaddressed, undermining public confidence and impairing the operations of the executive branch.

Inquire and potentially intervene if an agency ethics program appears to OGE to be out of compliance with ethics requirements

Without its Full Appropriation

- OGE will be unable to carry out its oversight function.
- OGE will be unable to address systemic or individual ethics issues that result in the public losing trust in government operations.

In fiscal years 2024 and 2025, OGE will continue to conduct real-time inquiries and reviews in response to data or external sources that may indicate that an agency ethics

¹ The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rests with the management of the employing agency, the relevant Inspector General’s office, or in the case of alleged crimes, the Justice Department. *See* 5 U.S.C. § 13122. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an appointee’s compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE’s only recourse would be to notify the President. *See* 5 U.S.C. § 13122(f)(2)(A).

program is out of compliance. OGE will also formalize its written procedures to establish when OGE conducts such inquiries and reviews.

Inquire and potentially hold the employing agency accountable for action when one of its employees appears to OGE to be out of compliance with ethics requirements

Although OGE's primary mission is prevention, when OGE is made aware that an employee appears to be out of compliance with ethics requirements, OGE may take one of the following steps: make inquiries to the employee's agency ethics officials; determine whether the agency is taking sufficient remedial actions; recommend that the agency investigate or take corrective or disciplinary action; and determine whether further investigation is required. If further investigation is required, OGE may recommend that the agency refer the matter to the agency's Inspector General. After an investigation by the agency and/or an Inspector General, OGE will consider whether any further action is required. If OGE determines the noncompliance was the result of a systemic problem with the management of the agency ethics program, OGE may evaluate the program through an unscheduled program review.

In very rare cases, OGE may directly refer a case to the Inspector General for investigation, but only when OGE is in the best position to know the facts. OGE can also use its authority to decline to certify a public financial disclosure report that comes to OGE for review. While OGE can make referrals and decline to certify reports, OGE is statutorily prohibited from making determinations that a past action constitutes a violation of a criminal ethics law.

Use transparency to hold agency leaders and ethics programs accountable

OGE uses transparency to hold agency leaders and ethics programs accountable. In fiscal years 2024 and 2025, OGE will continue to publish individuals' ethics documents and agency ethics program documents. This includes oversight correspondence, program review reports, Annual Questionnaire responses, 1353 travel reports, as well as public financial disclosures, ethics agreements, related compliance documents, waivers to the Ethics Pledge, and Certificates of Divestiture. Without this transparency, the public could not as meaningfully oversee the integrity of its government. See page 33 for more information.

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

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

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

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

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

OGE has a unique and important statutory role in supporting Presidential transitions. OGE actively prepares the agency and the executive branchwide program in advance of each Presidential election to be ready to carry out its important Presidential appointments work. Failure to effectively prepare to assist the

President and the Senate in the Presidential appointments process can result in critical senior leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

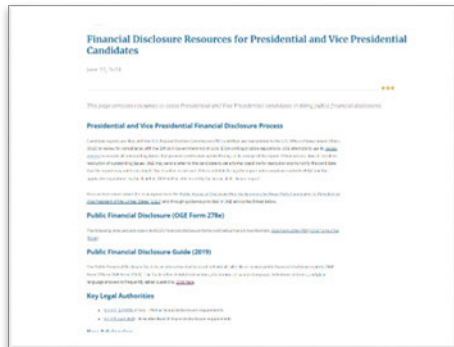
- OGE will be unable to fulfill its statutory role in Presidential election readiness and the Presidential appointments process.

Engage and actively participate on governmentwide transition councils

As part of its statutory role under the Presidential Transition Act, OGE will actively participate in the Agency Transition Directors Council. This Council is responsible for coordinating transition activities among the Executive Office of the President, agencies and departments, the campaigns of eligible candidates, and the transition team of the President-elect. OGE will timely prepare and submit statutorily required information for inclusion in the Transition Directory and reports to Congress. OGE also will participate in

events hosted by non-governmental organizations, such as the Partnership for Public Service’s Presidential Transition Service Providers’ Council.

Review disclosures and provide ethics support to Presidential candidates



In fiscal year 2024, OGE will complete a review for technical completeness of public financial disclosure reports of individuals who declare their candidacy for the Office of the President of the United States. OGE will make these reports available on its website.

In fiscal year 2025, OGE will also collaborate with the General Services Administration (GSA) to provide assistance as part of GSA’s responsibility to provide pre-election services and facilities to eligible candidates for President or Vice President. OGE will offer early and ongoing ethics support and training on *INTEGRITY*, OGE’s secure, web-based system for collecting and reviewing public financial disclosure reports.

Support and hold agency ethics officials accountable to prepare for a Presidential election

Beginning in January 2024 and continuing on beyond the election, OGE will provide significant support to agency ethics officials to ensure that they are prepared for their enhanced responsibilities and the increased workload associated with a Presidential election. OGE will support agency ethics officials’ ability to successfully manage a potential surge in financial disclosure filings related to a high volume of incoming nominees, provide each new agency employee with an initial ethics orientation, and educate a high-volume of officials leaving government about the ethics rules that apply to seeking employment and post-government employment.

In addition, OGE will train and collaborate with a variety of external stakeholders. For example, because of its unique role, OGE will provide training to Senate staff on OGE’s role in the nomination process.

Update key resources for campaigns, transition teams, nominee financial disclosure filers, and reviewers

OGE will review and update, as needed, key resources, such as those described below:

Transition Guide	The Transition Guide is a resource for Presidential Transition Teams to prepare for the upcoming transition, so that top leadership positions can be filled quickly and free from conflicts of interest.
Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review	OGE publishes the list of Presidentially appointed, Senate-confirmed (PAS) positions subject to its review to complement this publication.
Quick Guide to PAS Reports OGE Reviews	This Quick Guide describes which PAS reports are or are not subject to OGE review.
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.
Nominee Ethics Guide	The Nominee Ethics Guide is a resource for potential Presidentially appointed, Senate-confirmed (PAS) nominees to introduce them to the nominee process and provide guidance on financial disclosure and an overview of key ethics rules and regulations. It includes sections explaining what to expect during the nominee process, how to have an ethical start to federal service, how to be a leader in ethics, and what to consider when planning to leave federal service. The appendix contains detailed reference information, such as instructions for <i>INTEGRITY</i> , and financial disclosure checklists.
Nominee Public Financial Disclosure Review Checklists	OGE developed this collection of public financial disclosure checklists for prospective incoming Presidential nominees who file public financial disclosure reports, as well as for agency reviewers.
<i>INTEGRITY</i> User Guide and Job Aids	This guide is a reference manual for agency ethics officials using <i>INTEGRITY</i> , the web-based system developed by OGE for filing and reviewing executive branch public financial disclosure reports (OGE Form 278e and OGE Form 278-T).

Prepare for a Potential Agency Review Team

OGE will take the steps required by the Presidential Transition Act to update its succession plan and prepare briefing materials for a potential incoming Agency Review Team. These materials include OGE's Agency Profile, which provides an overview of the executive branch ethics program and OGE. It also includes detailed information about OGE's leadership, structure, and components; major functional areas; and management practices.

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

Following a Presidential election (regardless of whether this results in a new administration or a second term of a sitting administration) and throughout an administration, OGE continuously assists the President and the Senate in the Presidential appointments process. In fiscal years 2024 and 2025, OGE will continue to collect and thoroughly review the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed (PAS) nominees. The reports for these positions are the most complex financial disclosure reports in the government. In connection with the review of these reports, OGE reviewers work with officials at various federal agencies and the White House to resolve potential conflicts of interest through written ethics agreements. Key highlights of OGE's planned work are described below.

Without its Full Appropriation

- OGE will be unable to review nominee reports and craft ethics agreements, resulting in critical leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk.
- OGE will be unable to timely transmit nominee financial disclosure reports to the Senate, delaying hearings and leaving agencies without leaders.
- Potential conflicts of interest may be undetected or inadequately remedied, resulting in loss of public trust and disruption to the government.

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

In fiscal year 2025, OGE will review for financial conflicts of interest and certify a greatly increased volume of public financial disclosure reports resulting from the 2024 Presidential election, regardless of the outcome of the election. Based on OGE's experience with Presidential elections, prior to and for two years after an election, OGE expects a more than doubling of its workload for reviewing financial disclosure reports of nominees requiring Senate confirmation. The rate of confirmations by the Senate also affects OGE's workload.

OGE will continue to work with agency ethics officials to identify and resolve any conflicts of interest that incoming PAS leaders may have. OGE identifies and resolves potential conflicts of interest of nominees by establishing written ethics agreements with all nominees prior to their confirmations. OGE leverages the process to provide these leaders with an introduction to their new ethical responsibilities as public servants.

Strategic Objective 3.3: Foster ethical leadership in senior officials

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

Communicate directly with agency heads regarding their unique responsibilities under the ethics regulations

The agency head is responsible for, and must exercise personal leadership in, establishing and maintaining an effective agency ethics program and fostering an ethical culture in the agency. OGE will continue its practice of engaging with senior leadership directly by delivering written welcome letters from OGE's Acting Director on the importance of ethical leadership. OGE also will continue providing targeted communications and resources and leveraging the nominee financial disclosure reports and ethics agreement process to increase understanding of the ethical role and responsibilities of the agency head, as both a leader and as an individual.

Encourage senior leaders' support of the ethics program

OGE will continue its practice of engaging with senior leadership directly and indirectly, through external communications and involvement in nominee financial disclosure reports and ethics agreements, as well as through publications and educational offerings. For example, OGE will continue to provide briefings to new Senior Executive Service members about the importance of ethics and their vital role in maintaining the public's trust. Through these training opportunities, OGE and agencies convey the importance of and techniques for leading ethical organizations. Finally, through ongoing research and partnerships with others, OGE will share tools and tactics for senior leaders to use to effectively communicate the ethical expectations for their organizations.

Maintain specific regulatory ethics standards for senior leaders and managers

OGE will maintain specific regulatory ethics standards for senior leaders and managers. Ethical leadership and building an ethical culture are key components of the executive branch ethics program. Culture is one of the strongest drivers of behavior. OGE

will support ethics officials in taking concrete steps to help build an ethical culture and assist leaders in supporting it.

Educate senior leaders and managers on their personal and programmatic ethics obligations

OGE will create and share trainings and tools targeted to senior leaders and managers on their personal and programmatic ethics obligations. In fiscal year 2025, OGE will specifically focus on developing materials for supervisors to assist them in meeting their ethics responsibilities. Supervisors are responsible for working with agency ethics officials to help resolve conflicts of interest and enforce government ethics laws and regulations, including those requiring certain employees to file financial disclosure reports. In addition, supervisors are responsible, when requested, for assisting agency ethics officials in evaluating potential conflicts of interest and identifying positions subject to financial disclosure requirements.

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

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

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

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

Strategic Objective 4.1: Make ethics information publicly available

In fiscal years 2024 and 2025, OGE will continue to make ethics documents publicly available. Key highlights of OGE's planned work are described below.

Provide timely access to ethics information and improve document release across the executive branch

Without its Full Appropriation

- OGE will be unable to timely publish ethics documents, leaving the public unable to verify that leaders are free from conflicts of interest and to hold OGE accountable.
- OGE will be unable to increase transparency and maintain a responsive FOIA program.

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2024 and 2025, OGE will continue to timely post a variety of critical ethics documents on its website. Available documents include financial disclosure reports of high-level officials, ethics agreements, documentation of senior leaders' compliance with ethics commitments, certificates of divestiture, Ethics Pledge waivers, agency program review reports, policy guidance, and data about each agency's ethics program.

In fiscal years 2024 and 2025, OGE will continue to take steps to increase the visibility of ethics documents that are available for request. For example, although any waivers to the conflict of interest laws issued to an employee are only available for request

from that employee’s agency, OGE plans to post the names of all individuals who have received a waiver.

OGE will use its leadership and oversight authority to encourage agencies to take steps to increase the visibility of ethics documents that are available for request.

Maintain a responsive Freedom of Information Act (FOIA) program



OGE will maintain its strong FOIA program. In recent years, OGE’s volume of FOIA requests has remained higher than its historical average, driven in part by the public’s ongoing interest in government ethics. To increase transparency and respond to

burgeoning public interest, OGE will continue its practice of proactively posting on its website documents released in response to FOIA requests that are of particular interest to the public.

Strategic Objective 4.2: Reach a broader array of stakeholders

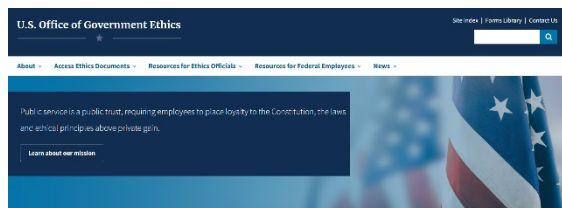
OGE seeks to reach a broader array of stakeholders to raise awareness of the systems and processes in place to detect and resolve conflicts of interest. Without accurate information the public cannot make informed judgments about the integrity of their government. When the public feels that information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

Without its Full Appropriation

- OGE will be unable to help the public and the media understand ethics requirements, resulting in less accurate news coverage and unwarranted criticism of government leaders.
- OGE will be unable to maintain its website, resulting in less timely and accurate ethics information, confused government officials, and less informed Americans.

In fiscal years 2024 and 2025, OGE will continue its external communications efforts to increase understanding of the executive branch ethics program. Key highlights of OGE’s planned work are described below.

Create communications that are accurate, compelling, relevant, and tailored to each target audience



In fiscal years 2024 and 2025, OGE will continue to ensure that its communications are accurate, compelling, relevant, and tailored to each targeted audience, as well as delivered through effective communication channels. These channels include its website,

publications, and social media. When appropriate, OGE will also seek input from the public on ways the agency can improve its communications efforts.

Implement new strategies for reaching a broader array of stakeholders

OGE will implement new strategies to reach a broader array of stakeholders, to include targeted outreach to regional news outlets and affinity and advocacy groups, including groups that represent underserved communities. OGE will update its webpage for the press and add a new section for the public. In addition, OGE will use different tools and approaches, such as increasing the use of video content and infographics to visually describe its work, in an effort to reach a broader array of stakeholders.

Respond timely to external requests for information and assistance

Outside interest in the executive branch ethics program has grown significantly in recent years. Inquiries from the public, the press, Congress, and various organizations require OGE's timely attention and response. If OGE does not respond to requesters promptly, they may publish inaccurate stories, take hasty action, or simply lose confidence in the integrity of the executive branch.

To ensure that these stakeholders have the information they need, when they need it, OGE will timely respond to the expected 1,000 external requests for information and assistance received each year from the public, the press, Congress, and various organizations. Through these interactions, OGE aims to increase awareness and understanding of the executive branch ethics laws and regulations, and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationships and information-sharing with regional media outlets, industry-focused media, and organizations that represent underserved communities, by creating a media kit that describes how and why the media may want to review ethics documents. In addition, OGE will continue to ensure that its website content is accurate and up-to-date to assist these stakeholders.

Participate and collaborate with ethics practitioners across various segments of society

Ethics in government is a shared concern across all segments of society. To succeed, OGE must learn from experts in diverse fields. Therefore, OGE continues to participate as a member of private sector, state, and local ethics organizations such as the Council on Governmental Ethics Laws ([COGEL](#)), in addition to federal interagency groups, such as the [Small Agency Council](#). Through meetings, presentations, and online forums, OGE continues to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. OGE also conducts outreach and participates with organizations that share common interests related to OGE's mission, such as the [Partnership for Public Service](#). In addition, OGE will continue to collaborate with the most senior ethics practitioners from all three branches of government to discuss issues of common interest and to build valuable relationships among the three branches.

Crosscutting Objective

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

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

Without its Full Appropriation

- OGE will be unable to timely implement its Equity Action Plan or DEIA Strategic Plan.

Advance equity in OGE's programs

OGE has determined that it can most effectively advance equity and remove barriers for underserved communities in four key program areas: (1) public participation (see page 18), (2) ethics education, regulations, and interpretive guidance (see page 14), (3) ethics documents for external stakeholders (see page 33), and (4) procurement. As described throughout this document, OGE plans to undertake, or has already implemented, a variety of actions to further equity among federal employees, the general public, members of the greater executive branch ethics community, and disadvantaged businesses.

Improve diversity, equity, inclusion, and accessibility in OGE's operations

OGE strives to be a model for diversity, equity, inclusion, and accessibility (DEIA), so that all employees are treated with dignity and respect. In fiscal years 2024 and 2025, OGE will continue to take steps to implement the Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce and more specifically, to make progress on the five goals outlined in OGE's DEIA Strategic Plan:

- *Recruitment and Hiring:* Expand outreach during the hiring process; mitigate bias in the hiring process; and promote the agency as an organization that supports diversity in its workforce.
- *Professional Development for Ethics Officials:* Increase access to and development opportunities within the ethics profession for federal employee's executive branchwide (see page 14).
- *Professional Development for OGE Staff:* Modify the Employee Development Plan (EDP) program to create more uniformity and to better serve employees who are members of underserved communities.
- *Accessibility:* Ensure a robust 508-compliance program.
- *Safe Workplace and Harassment:* Ensure that the OGE workplace is safe for all employees and free of bullying.

Stewardship Objectives

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

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

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

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

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. OGE's continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities. OGE will continue to leverage workplace flexibilities to recruit and retain expert talent.

Without its Full Appropriation

- OGE will be unable to pay staff their full salaries resulting in poor morale, increased departures, and the inability to fill critical vacancies required to carry out the agency's mission work, including in the Presidential appointments process during a Presidential election year.

Organizational Health and Performance: OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings; conducting a mid-year strategic objective review; holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities; reviewing the Employee Viewpoint Survey results; and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. OGE will review indicators that measure, monitor, and improve organizational health and performance, and will incorporate an analysis of these indicators into existing reviews.

Employee Recognition: OGE will continue to recognize employees through its awards program, which includes spot awards and year-end performance bonuses. In fiscal year 2020, OGE updated its spot award program to ensure more awards are granted

throughout the year and that they are based on a set of criteria. In fiscal year 2023, OGE surveyed its staff to identify recognition preferences and new ideas. OGE will incorporate changes based on the feedback, such as increased written praise. In addition, OGE will continue its staff-run Employee Recognition Group, which provides management with new, non-monetary ways to recognize staff based on employee input. OGE also will continue to hold its annual employee recognition event.

Workforce Development: OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities and providing employees with time and resources to pursue development. OGE will continue to incorporate the requirements of the Employee Development Plan (EDP) into employees' performance standards. In this way, OGE confirms its commitment to continuous learning and employee professional development. In fiscal year 2024, OGE will introduce refinements to its EDP program to create more uniformity and to better serve employees who are members of underserved communities. OGE also will continue to identify agency knowledge and skills gaps and will use the EDP to train employees to fill those gaps. These actions, collectively, will ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

OGE EMPLOYEE DEVELOPMENT PLAN			
Employee's Last Name		First Name, MI	
Division and Branch		Title	
Period Covered		Phone	
Employee's Commitment	I agree to carry out the planned activities and participate in the measurement of progress toward the objective(s), which will inform the continuous learning requirements of my performance standards.		Signature _____ Date _____
Other Employee Information or Comments			
Supervisor Name		Phone	
Supervisor's Commitment	I have agreed to these learning objectives and will support and assist the employee in attaining them.		Signature _____ Date _____
A. Learning Objective(s)			
B. Relevance to Agency Objectives	Strategic Objective 1.1 - Provide expert guidance and support to stakeholders Strategic Objective 1.2 - Strengthen the expertise of officials who are integral to the executive branch ethics program Strategic Objective 1.3 - Continuously refine ethics policy and issue interpretive guidance Strategic Objective 2.1 - Monitor agency compliance with executive branch ethics program requirements Strategic Objective 2.2 - Monitor senior leaders' compliance with individual ethics commitments Strategic Objective 3.1 - Prepare for a Presidential transition Strategic Objective 3.2 - Provide assistance to the President and Senate in the Presidential appointment process Strategic Objective 4.1 - Inform the public about OGE and the executive branch ethics program Strategic Objective 4.2 - Make ethics information publicly available Management Objective 5.1 - Sustain a strong culture of performance management Management Objective 5.2 - Strengthen organizational compliance and fiscal stewardship Management Objective 6.3 - Continuously enhance OGE's information systems and processes		
Identify the strategic objective(s) advanced by the planned activities.			
Identify the division or branch objective(s) advanced by the planned activities.	Division or Branch Objective(s) Targeted		

Employee Wellness: OGE is committed to its employee's well-being and supports initiatives that extend beyond the workplace. For example, OGE provides an Employee Assistance Program (EAP) through its contract with Federal Occupational Health. OGE regularly circulates the EAP newsletter, announcements, and courses for wellness to its staff. OGE also has a section on its Intranet dedicated to employee wellness, to help employees find resources when needed. OGE has several policies that support employee wellness, such as the use of administrative leave for preventative care. With regard to physical safety, OGE conducts Occupational Safety and Health Administration related checks of its physical space and requires employees to conduct reviews of their telework spaces.

Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness

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

Without its Full Appropriation

- OGE will be unable to keep content up-to-date on its website, which is relied upon by ethics officials to carry out their work and by the public to oversee their government.

Implement a comprehensive IT replacement and migration to the cloud

In fiscal year 2022, OGE reached the end of the four-year life-cycle for its IT infrastructure and associated equipment. At its urgent request, OGE received appropriations in fiscal year 2023 to replace outdated IT equipment. OGE timely procured all new equipment and peripherals to support a hybrid work environment. This includes softphones and individual virtual meeting accounts for each employee. The implementation of softphones will allow employees to make and receive phone calls on an OGE-owned phone number over the internet without needing a physical telephone, and individual virtual meeting accounts will increase productivity by making it easier for employees to collaborate and stay informed, organized, and connected.

Notably, in fiscal year 2024, OGE will finish migrating its network to a secure, FedRAMP-certified government cloud environment which will simplify compliance with National Institute of Standards and Technology guidelines, simplify network disaster recovery, allow OGE to shrink its physical office space, and provide network access independent of conditions at OGE's physical work location. Moving to the cloud will also eliminate the need to buy new network hardware and software every four years (the network refresh cycle). In fiscal years 2024 and 2025, OGE will draft and implement a strategy for maintaining operations and network security for this new cloud environment.

Enhance the functionality of information technology tools, resources, and systems

OGE employs dedicated application developers who have improved agency and program efficiency, increased data access, enhanced management practices, and strengthened compliance activities. In fiscal years 2024 and 2025, OGE will continue to devote resources to applications that support major mission programs, such as the Desk Officer Program, the Annual Questionnaire, the Records Management Program, the Privacy Program, FOIA, and financial disclosure, as well as those that support internal operations, such as requisition processing, budget formulation, and inventory controls, including the tracking of IT equipment.

Maintain and refine OGE's website

OGE's website is the agency's main communication tool and the most valuable resource for OGE's stakeholders, including agency ethics officials, the media, and the general public. In fiscal years 2024 and 2025, OGE will continue to make sure its website is compliant with the 21st Century Integrated Digital Experience Act. OGE will implement any changes as necessitated by the results of the section 508 of the Rehabilitation Act governmentwide assessment. OGE also will continue to regularly review its content to make sure that the hyperlinks work and the content is accurate and up-to-date. In fiscal year 2024, OGE plans to update its webpages for ethics education to make it easier to search its offerings. OGE also plans to create new content for the media and the public to help them understand how the executive branch ethics program works to prevent conflicts of interest, as well as to better understand the ethics documents available for request.

Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE

In addition to its mission work, OGE conducts its agency operations following the principle that "public service is a public trust." OGE takes seriously its compliance with governmentwide directives and their important policy objectives, including OGE carefully safeguarding the government resources entrusted to the agency.

Without its Full Appropriation

- OGE's operations will be put at risk, as will its compliance with important statutory and Administration directives, including cybersecurity, records management, and data governance.

Fiscal stewardship: OGE will remain a good steward of taxpayer dollars, as reflected by its record of strong financial management. For example, in fiscal year 2024 OGE is relocating and reducing its office space by over 70 percent resulting in annual savings of over \$1 million. OGE was forced to move because GSA's current lease for OGE's space expired in February 2024. OGE leveraged this challenge by not only shrinking its physical footprint, but by backfilling an existing federal lease held by another agency, saving money for both agencies and the government overall. OGE also used this challenge to excess furniture to GSA to benefit other agencies, to digitize the remainder of its paper records to comply with upcoming NARA directives, and to move its network to a secure government cloud environment.

In fiscal years 2024 and 2025, OGE will continue to pursue other efficiencies, such as the economies of scale received from using shared service centers for a significant number of support services and OGE cost-cutting initiatives. For example, OGE uses in-house information technology specialists to design, develop, and create internal applications, significantly increasing staff efficiency and reducing contracting costs. OGE's current work environment will continue to result in savings from a reduced need for supplies, printing, and transit subsidies.

Internal controls: OGE will continue to maintain effective internal controls in all area operations. With regard to tracking purchases, inventory, and procurement, OGE uses a dedicated application on its internal network to approve requisitions, which includes additional internal controls and tracking to ensure that OGE remains fiscally responsible. OGE also will continue to carefully track its property inventory to protect against loss.

To identify the need for additional internal controls, OGE annually updates its enterprise risk management registry to identify additional internal controls that need to be implemented. OGE will continue to undergo independent audits of its financial statements to ensure that they are presented fairly in all material respects, and in accordance with generally accepted accounting principles. OGE will continue to ensure that there are no material weaknesses in internal controls over financial reporting and that OGE continues to comply with applicable laws, regulations, and contracts. Lastly, OGE will continue to monitor and evaluate its internal controls, and constantly seek improved methods and increased accountability to guard against potentially fraudulent practices.

Compliance: OGE will continue to strive to remain compliant with the wide array of requirements applicable to federal agencies. Key highlights of OGE's planned work are described below.

Data: OGE will continue to ensure the agency's compliance with the Foundations for Evidence-Based Policymaking Act. OGE will expand its data activities by building its data governance around key systems, providing data skills training such as agency-wide lunch and learns, and maintaining a data inventory. OGE will continue to actively participate in the Chief Data Officers Council and prioritize the use of data in its decision making, including in monitoring the organizational health of OGE.

Privacy: OGE will continue to ensure the agency's compliance with the Privacy Act, as well as privacy requirements established by OMB. In fiscal years 2024 and 2025, OGE will continue to protect privacy by reviewing proposed IT systems and projects that collect and manage privacy protected information. OGE also will comply by recertifying existing IT systems and projects, reviewing Privacy Threshold Analyses, and preparing and updating privacy-related documents, such as Systems of Records Notices and Privacy Impact Assessments. OGE will continue to review and update privacy controls that are required as part of the annual security reviews for OGE's network and *INTEGRITY*. In addition, OGE will continue to actively participate in governmentwide privacy councils and to provide annual privacy training and role-based privacy training to OGE staff and contractors.

Records: OGE will continue to maintain a robust records program in fiscal years 2024 and 2025. OGE will meet all electronic records requirements, as required by NARA, and improve management of electronic materials. In fiscal year 2024, the Records Program will continue to evaluate electronic records management processes, including email capture and the Electronic Records and Permanent Records Rooms. Lastly, OGE will continue to work with NARA to refine and update

existing records disposition schedules. For example, OGE plans to submit a new governmentwide disposition schedule to implement the new Legal Expense Fund (LEF) program.

Cybersecurity: In accordance with the Federal Information Security Modernization Act (FISMA) of 2014, OGE's security program will continue to provide mandatory annual cybersecurity awareness training; review weekly network perimeter scans performed by the Department of Homeland Security; conduct and review monthly scans of the internal OGE network; procure and participate in annual security assessment reviews conducted by accredited independent auditors using FISMA CIO and FISMA IG metrics; and prepare for *INTEGRITY's* annual security assessment. OGE also will continue to take steps to comply with the Executive Order on Improving the Nation's Cybersecurity and subsequent guidance. This work is critical to protect the confidentiality, integrity, and availability of OGE's information and information systems, and to protect against unauthorized access and use.

Included below is a table with OGE's fiscal year 2025 cybersecurity submission broken out using the National Institute of Standards and Technology categories (Identify, Protect, Detect, Respond, and Recover).

NIST Framework/Capability	FY2025 Submission (in 000s)	Purpose/Outcome
Identify - Continuous Diagnostics and Mitigation (CDM)	\$70	Implement and maintain the tools associated with the CDM program.
Identify - Non-CDM Information Security Continuous Monitoring	\$16	Implement and maintain ISCM capabilities not provided through CDM Phase 1.
Identify - Mobile Device Management	\$6	Manage the security of government-owned mobile devices and ensuring that mobile devices connecting to federal networks are secure.
Identify - Authorization and Policy	\$133	Attainment and renew authorizations to operate (ATOs) for agency information systems.
Protect - Trusted Internet Connections	\$40	Acquire and maintain Managed Trusted Internet Protocol Services (MTIPS) provider.
Protect - Credentialing and Access Management	\$20	Acquire and maintain Personal Identity Verification (PIV) cards or other tokens to authenticate system users.
Protect - Insider Threat	\$4	Establish and maintain an Insider Threat Program.
Protect - System Security Testing and Analysis	\$17	Assess the vulnerability of an enterprise by multiple means of vulnerability scanning and penetration testing, including automated penetration testing.

NIST Framework/Capability	FY2025 Submission (in 000s)	Purpose/Outcome
Protect - Security Training	\$20	Create and utilize cybersecurity awareness and training materials, including tools, design, and training completion tracking.
Protect - Cloud Security	\$299	Ensure sufficient security of systems and information that have been moved to cloud-based platforms.
Protect - Data Safeguarding	\$20	Safeguard data at rest.
Protect - Secure Data Transmission	\$20	Safeguard data in motion.
Detect - Anti-Phishing and Malware Defense	\$37	Implement technologies and processes that reduce the risk of malware, both generally and for that which may be introduced through email and social engineering.
Detect - Data Loss Prevention	\$2	Implement Data Loss Prevention (DLP) technology.
Detect - Intrusion Prevention	\$10	Implement intrusion prevention technology.
Respond - Incident Management and Response	\$10	Respond to and manage information security incidents.
Respond - Prosecution and Investigation of Cyber Intrusions	\$3	Gather evidence in support of investigating and prosecuting cyber intrusions.
Recover - Disaster Recovery	\$12	Return a system or systems to operating capability following a disaster.
Recover - Incident Recovery	\$2	Return a system or systems to operating capability following a cyber-related incident.
Recover - Incident Notification	\$9	Provide public/internal notifications to potentially impacted persons following cybersecurity incidents involving the possible loss of PII.
Identify - Data Categorization and Classification	\$5	Implement security monitoring and enforcement rules based on existing and newly developed data categorization and "tags" within enterprise datasets and documents
Identify - Supply Chain Risk Management (SCRM) and Acquisitions Management	\$5	Establish the program and to operate and maintain the Information & Communications Technology (ICT) SCRM and Acquisitions management program
Protect - Zero Trust Network Architecture	\$15	Moving the organization's enterprise architecture towards an end state where every distinct application is run inside its own perimeter (or is its own perimeter), and is treated as internet-accessible

NIST Framework/Capability	FY2025 Submission (in 000s)	Purpose/Outcome
Protect - Security Log Management	\$7	Planning, processing, implementing, and improving log management.
Protect - Secure Patch Management	\$5	Planning, implementing, and integrating patch management processes.
Detect - Endpoint Detection and Response	\$1	Implement EDR capabilities. This includes gap-filling activities and/or standing up the capability.
M-22-16 - Cyber Human Capital	\$10	
M-22-16 - Securing Infrastructure Investments	\$70	
M-22-16 - Sector Risk Management Agency (SRMA)	\$60	

Section IV – Conclusion: OGE requires its full requested funding of \$22,386,000 in fiscal year 2025

The important work OGE does is critical to the public’s confidence in executive branch officials and operations. OGE simply cannot carry out its crucial work without the necessary resources.

OGE requires its full requested funding of \$22,386,000 in fiscal year 2025 to undertake its important mission of providing leadership and oversight to prevent and resolve conflicts of interest in the executive branch. An underresourced OGE creates significant risk, undermines the integrity of government operations, and further strains public confidence. Funding at the requested level will allow OGE to make mission-critical investments in the systems and staff necessary during a high-demand Presidential election year, when OGE’s workload increases irrespective of the outcome, and to advance the Administration’s priorities. These investments are critical to OGE’s ability to continue to successfully undertake its vital work. Cutting or underfunding OGE’s budget would increase risk to the executive branch ethics program.

For all of the vital reasons outlined here, and in its justification, OGE urges the approval of its request for \$22,386,000 to fund the agency in fiscal year 2025.

Section V – Fiscal Years 2024 and 2025 Performance Goals

Strategic Goal I: Advance a Strong, Consistent Executive Branch Ethics Program			
Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
1.1: Provide expert guidance and support to ethics officials and other stakeholders	Ethics officials are aware of the resources available to support them in performing their ethics job duties.	Indicators: % of ethics officials on the listserv # of listserv messages sent	Indicators: % of ethics officials on the listserv # of listserv messages sent
	OGE Desk Officer assistance helps ethics officials perform their job duties.	80%	80%
1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program		Deliver DAEO Orientation; Accelerated Certification in Ethics (ACE); and a Skillbuilder # of PEP Certificates awarded Deliver Election Readiness-related training	Deliver DAEO Orientation; Accelerated Certification in Ethics (ACE); and a Skillbuilder # of PEP Certificates awarded Deliver Election Readiness-related training
	After participating in an OGE offering, ethics officials believe they can more effectively perform their ethics job duties.	80%	80%
1.3: Continuously refine ethics policy and issue interpretive guidance	Legal and Program Advisories help officials perform their ethics job duties.	80%	80%
	In lieu of performance goals, OGE tracks a variety of milestones.	Milestone: OGE will take steps necessary to publish the final rule (SOC Modernization).	Milestone: OGE will take steps necessary to submit a proposed rule (5 C.F.R. 2640) to OMB for clearance.

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

Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
1.4: Lead the financial disclosure program and provide the executive branch e-filing system, <i>INTEGRITY</i>	Agency administrators are satisfied with the support provided by OGE on <i>INTEGRITY</i> , its electronic public financial disclosure filing system.	80%	80%
	OGE addresses all security review findings.	Address all security review findings	Address all security review findings
	Financial disclosure resources provided by OGE (e.g., Public and Confidential Financial Disclosure Guides, Financial Disclosure Playlist, etc.) assist reviewers in the review of financial disclosure reports.	90%	90%

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

Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
2.1: Monitor agency compliance with executive branch ethics program requirements	Agency ethics programs are reviewed within established time frames.	3 Year cycle – 31 agencies 4 Year cycle - 11 agencies	3 Year cycle – 29 agencies 4 Year cycle - 14 agencies
2.1: Monitor agency compliance with executive branch ethics program requirements	In cases in which OGE identifies a program weakness, OGE’s program review results in improvements in the agency’s ethics program.	80%	80%
2.2: Monitor senior leaders’ compliance with individual ethics responsibilities and commitments	Public financial disclosure reports (new entrant, annual, termination, and transaction) required to be submitted to OGE for second-level review are closed within established time frames.	90%	90%

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

Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions	In lieu of performance goals, OGE tracks a variety of milestones.	Milestones: Implement the training plan for OGE staff and ethics officials Publish an updated Ethics Agreement Guide (Guide to Drafting Nominee Ethics Agreements) Update the Transition Guide Update the Nominee Guide Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review	Milestone: Publish Agency Profile
3.2: Assist the President and the Senate in the Presidential appointment process	Initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments are provided to the agency within established time frames.	90%	90%
	Final financial disclosure reports of Presidential nominees for Senate-confirmed appointments are certified by OGE within established time frames.	90%	90%

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

Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
3.3: Foster ethical leadership in senior officials	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: # of communications to senior officials # of senior officials who received a communication	Indicators: # of communications to senior officials # of senior officials who received a communication

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

Strategic Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
4.1: Make ethics information publicly available	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: # of ethics documents requested Milestone: Make one additional dataset available on OGE's website	Indicator: # of ethics documents requested
4.2: Reach a broader array of stakeholders	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: # of website pageviews # of inquiries from the public # of outreach/feedback activities OGE's Twitter account engagement rate	Indicators: # of website pageviews # of inquiries from the public # of outreach/feedback activities OGE's Twitter account engagement rate

Crosscutting Objective			
Cross-cutting Objective	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
5.1: Advance equity in OGE's programs and operations	In lieu of performance goals, OGE tracks a variety of milestones.	<p><i>Milestones:</i> Make progress on a majority of items in OGE's Equity Action Plan</p> <p>Make progress on a majority of items in OGE's DEIA Strategic Plan</p>	<p><i>Milestones:</i> Make progress on a majority of items in OGE's Equity Action Plan</p> <p>Make progress on a majority of items in OGE's DEIA Strategic Plan</p>

Stewardship Objectives			
Stewardship Objectives	Performance Goals	Fiscal Year 2024 Target	Fiscal Year 2025 Target
6.1: Sustain a high-performing, cross-functional staff	OGE’s Employee Engagement Index score on the Employee Viewpoint Survey.	80%	80%
6.2: Leverage technology to increase efficiency and effectiveness	In lieu of performance goals, OGE tracks a milestone.	<i>Milestone:</i> Develop essential SOPs/user support resources for network operations in a cloud environment	-
6.3: Safeguard the government resources entrusted to OGE	Results of annual financial audit.	An unqualified opinion	An unqualified opinion
	Results of Cybersecurity Risk Management Assessment.	Managing risk for majority of categories	Managing risk for majority of categories
	Percentage of OGE employees who take required training (i.e., records, security, privacy, ethics).	90%	90%

From: [Nicole Stein](#)
To: [Diana Veilleux](#)
Subject: RE: Draft Transmission Email
Date: Wednesday, February 7, 2024 6:19:28 PM
Attachments: [U.S. Office of Government Ethics 2023 APR \(for OMB\).docx](#)
[U.S. Office of Government Ethics 2025 CBJ and APP \(for OMB\) .docx](#)

1st attachment is a nonresponsive record. The second attachment is a draft of the document released above at pp 6-62. It is withheld in full pursuant to (b)(5) as deliberative.

What you are seeing is just the hyperlink text and not the file name but I did go ahead and remove the version number. Attached are the most up to date files. If you are still going to read them, they are both saved here in case you have any edits: **(b)(5) internal OGE network address**

From: Diana Veilleux <djveille@oge.gov>
Sent: Wednesday, February 7, 2024 6:03 PM
To: Nicole Stein <nstein@oge.gov>
Subject: RE: Draft Transmission Email

Hi Nicole

Can you resave these with OGE in the title: e.g., OGE FY 2025 APP/CBJ and OGE FY 23 APR. I would do it but I am afraid I will mess something up. It is better to include the agency name on the file name so the documents don't get lost.

Thanks!

Diana

From: Nicole Stein <nstein@oge.gov>
Sent: Wednesday, February 7, 2024 5:08 PM
To: Shelley K. Finlayson <skfinlay@oge.gov>; Diana Veilleux <djveille@oge.gov>
Subject: RE: Draft Transmission Email

These are the most recent versions. I went in and updated the page numbers in the TOC and throughout the documents (ex: see page XX).

[APP/CBJ \(clean, v8\)](#)
[APR \(v5\)](#)

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Wednesday, February 7, 2024 4:51 PM
To: Diana Veilleux <djveille@oge.gov>; Nicole Stein <nstein@oge.gov>
Subject: RE: Draft Transmission Email

Thanks! Looks good to me.

From: Diana Veilleux <djveille@oge.gov>

Sent: Wednesday, February 7, 2024 4:41 PM

To: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>

Subject: Draft Transmission Email

Draft transmittal email:

Good Morning/Evening Alyssa

Attached please find updated drafts of the Office of Government Ethics' FY 2025 Congressional Budget Justification and Annual Performance Plan and FY 2023 Annual Performance Report, which are being provided for final review and clearance. In an effort to get these documents to you early, we forwent our usual step of having a final proofread before submission so please ignore any typos. Also, we are still working on adding visuals for the final APR. Of course, we will take both of those steps before we finalize the documents, as well as make any revisions you suggest.

Please let me know if you have any questions about these documents, and when we are cleared to submit them to Congress. As ever, we thank you for your consideration of OGE's budget needs.

From: [Nicole Stein](#)
To: [Deborah J. Bortot](#); [David J. Apol](#); [Heather A. Jones](#); [Shelley K. Finlayson](#)
Subject: Election Readiness Resources
Date: Thursday, August 31, 2023 2:37:15 PM

Good afternoon.

Deb and I just spoke with regard to next steps for the various election readiness resources. In order to create project plans for the various election readiness materials, we'll begin with a content review. The idea is for each of us (or whomever Deb assigns in PNB) to read the documents listed below with fresh eyes. The intent is to not to have exact language but to help determine the level of effort/work required for each document. Example: Need to add a section to the Nominee Guide on XX. Or need to modify text in the one pager to address XX. XX is not addressed anywhere, where should we address it.

I'll schedule a meeting for the week of 9/25.

NEW: Presidential Transition Guide (2020)

The Presidential Transition Act requires Federal agencies to prepare for a possible Presidential transition in each Presidential election year. OGE developed this Guide as a resource for the Presidential Transition Team, in the event there is a transition, so that leadership positions can be filled quickly and free from conflicts of interest. This Guide explains the nominee ethics process, provides strategies for establishing a strong ethical culture in a Presidential administration, and includes useful reference materials. [Click here >](#)

NEW: Guide for Nominees (2020)

OGE developed this Guide as a resource for potential Senate-confirmed, Presidential nominees. It is organized to take a nominee through the life cycle of a person who will serve as a Senate-confirmed Presidential appointee (PAS official). It includes sections explaining what to expect during the nominee process, how to have an ethical start to Federal service, how to be a leader in ethics, and what to consider when planning to leave Federal service. The appendix contains detailed reference information, such as instructions for Integrity and financial disclosure checklists. [Click here >](#)

NEW: Nominee Public Financial Disclosure Review Checklists (2020)

OGE developed this collection of public financial disclosure checklists for prospective incoming Presidential nominees who file public financial disclosure reports, as well as for agency reviewers. The collection includes a general checklist applicable to all nominees and supplemental checklists that target certain categories of professionals: attorneys; corporate officers, employees, and directors; university professors and deans; and investment fund managers. [Click here >](#)

NEW: (Unofficial) Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review (2020)

OGE has updated its unofficial Excel workbook listing the civilian Presidentially appointed, Senate-confirmed (PAS) positions traditionally subject to OGE's review in the nomination process. The official source for identifying political positions in the executive branch is the publication titled, "United States Government Policy and Supporting Positions." This publication, commonly known as the Plum Book, is published alternately by the Senate and the House committees after each

Presidential election. OGE publishes the list of PAS positions subject to its review to complement this publication. [Click here >](#)

NEW: Quick Guide to PAS Reports OGE Reviews

This Quick Guide describes which Presidentially appointed, Senate-confirmed (PAS) reports are or are not subject to OGE review. [Click here >](#)

NEW: Guide to Drafting Nominee Ethics Agreements (2020)

Ethics agreements reflect a nominee’s commitments to resolve their conflicts of interest and comply with the ethics laws and regulations. Agency ethics officials, in collaboration with OGE staff, draft each ethics agreement using standardized language, tailored as appropriate, from this Guide. [Click here >](#)

NEW: Ways OGE Can Help in the Presidential Transition (1-page graphic) (2020)

OGE is ready to assist a Presidential Transition Team in navigating the transition and laying the groundwork for a strong ethical culture in the administration. OGE is also ready to assist in establishing a strong White House ethics program. [Click here >](#)

Nicole

Nicole Stein (she/her/hers)
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#)
Subject: RE: Equity Action Plan
Date: Thursday, September 21, 2023 9:11:49 AM

I'm happy to do it.

From: Deborah J. Bortot
Sent: Thursday, September 21, 2023 9:11 AM
To: Heather A. Jones <hajones@oge.gov>
Subject: Equity Action Plan

Heather,

Nicole is looking for staffing from PNB for this. I'm thinking you and I should do it because Nicole said part of would be the Nominee Guide and Transition Guide. Also, part of it is how we write the Public FD Guide and Confidential Guide. Nicole and Megan are already on the team.

STRATEGY 3 – (b)(5) deliberative draft language

Note the final version of the Equity Action Plan can be found on www.oge.gov

Barriers to Equity:

- OGE is trying to address the potential inequitable awareness of, and access to, ethics records, including public financial disclosure records, which serve to support public confidence in the impartiality of government decision-making within the existing statutory requirements.

Evidence Base to Support Strategy:

- Per the U.S. Census, American Community Survey, 21.6% of people speak a language other than English at home.
- Per the Literacy Project, the average reading competence in the United States is at the 7th to 8th grade level.

- (b)(5) deliberative draft language

Document literacy includes the knowledge and skills needed to perform document tasks (i.e., to search, comprehend, and use non-continuous texts in various formats). Examples include job applications, payroll forms, transportation schedules, maps, tables, and drug or food labels.

- In his book Sludge, Cass Sunstein discusses impacts of administrative burden on underserved communities, such as preventing people from obtaining access to benefits for which they are eligible, including information. Examples of

“sludge” include lengthy forms, complicated websites, waiting time, and bureaucratic jargon. Sunstein’s studies indicate “sludge” has disproportionate effects on the historically marginalized, like the elderly, sick, people of color, and people with low incomes.

- In addition, in their book *Administrative Burden: Policymaking by Other Means*, Pam Herd and Don Moynihan explain that “learning costs” can also impact full and equal participation. Learning costs refer to time and effort expended to learn about a program, protection, or service, ascertaining eligibility status, the nature of benefits or protections, conditions that must be satisfied, and how to gain access to benefits or protections.

Actions to Achieve Equity:

To address these barriers, OGE will:

- Re-write/simplify the instructions of OGE’s Forms as part of the Forms Renewal process.
- Incorporate inclusion principles when drafting new ethics materials for external stakeholders.
- Continue to translate the online OGE Form 201 into other languages.

Proposed Metrics (Outputs and Outcomes):

Near- to Medium-Term (Likely to be mostly outputs)

OGE will track it’s near to medium progress by:

- Tracking the number of translations.
- Tracking the number of forms simplified.
- Tracking the number of documents revised for inclusion,

Longer-Term (Outcomes)

OGE will track its longer-term progress by:

- (b)(5) deliberative draft language
- Conduct post request surveys that includes questions asking if requestors are from underserved communities

Thanks,
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227

From: [Deborah J. Bortot](#)
To: [Nicole Stein](#)
Subject: RE: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting
Date: Thursday, September 7, 2023 4:56:27 PM

Yes. Just typos.

From: Nicole Stein
Sent: Thursday, September 7, 2023 4:54 PM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting

Just typos.

Nicole

Nicole Stein (she/her/hers)
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Thursday, September 7, 2023 4:52 PM
To: Nicole Stein <nstein@oge.gov>
Subject: RE: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting

Nicole,

I'm not sure if I got back to you on this, but I noticed:

(Transition Guide; [Nome Guide](#) Checklist; Nominee Guide; [Ethics Agreement Trustee Guide](#))

What is Nome Guide? You already list Nominee Guide.

What is Ethics Agreement Trustee Guide? Do you mean Ethics Agreement Guide? Is Trustee Guide LEF Guide for Trustees?

Thanks,
Deb

From: Nicole Stein
Sent: Tuesday, September 5, 2023 2:23 PM
To: Supervisor MailGroup <SupervisorMailGroup@oge.gov>
Subject: RE: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting

As a follow-up, if you could take a quick look and let me know by lunch if you see any showstoppers. Attached is a copy with less typos.

Happy to have a quick conversation.

Thanks!

Nicole

Nicole Stein (she/her/hers)
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: Nicole Stein
Sent: Tuesday, September 5, 2023 11:38 AM
To: Supervisor MailGroup <SupervisorMailGroup@oge.gov>
Subject: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting

Good morning,

Hope everyone enjoyed the long weekend.

At today's supervisor's meeting, I'll go over an outline of the proposed Year 2 Equity Action Plan. We are on a tight deadline to include a highlevel plan as part of the Budget submission this week.

You'll notice that the plan builds upon work we are already doing as an agency rather than introducing any wholesale new ideas.

Nicole

Nicole Stein (she/her/hers)
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: [Nicole Stein](#)
To: [Supervisor MailGroup](#)
Subject: RE: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting
Date: Tuesday, September 5, 2023 2:23:25 PM
Attachments: [Ideas v2.docx](#)

Attachment WIF per (b)(5)--
deliberative draft of OGE's Equity
Action Plan

As a follow-up, if you could take a quick look and let me know by lunch if you see any showstoppers. Attached is a copy with less typos.

Happy to have a quick conversation.

Thanks!

Nicole

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nstein@oge.gov
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From: Nicole Stein
Sent: Tuesday, September 5, 2023 11:38 AM
To: Supervisor MailGroup <SupervisorMailGroup@oge.gov>
Subject: Equity Action Plan - Year 2. For discussion at this afternoons supervisor meeting

Attachment WIF per (b)(5)--
deliberative draft of OGE's
Equity Action Plan

Good morning,

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You'll notice that the plan builds upon work we are already doing as an agency rather than introducing any wholesale new ideas.

Nicole

Nicole Stein (she/her/hers)
Chief, Agency Assistance Branch
nstein@oge.gov
(202) 482-9255
Follow OGE @OfficeGovEthics

From: [Nicole Stein](#)
To: [Diana Veilleux](#)
Subject: Files to print
Date: Tuesday, March 5, 2024 4:57:47 PM
Attachments: [U.S. Office of Government Ethics 2025 CBJ and APP \(publication\).pdf](#)
[U.S. Office of Government Ethics 2023 APR \(publication\).pdf](#)
[APP, CBJ, APR - Transmittal Letter \(Speaker\).docx](#)
[APP, CBJ, APR - Transmittal Letter \(VP\).docx](#)

1st attachment released above.
Other attachments are
nonresponsive records.

From: [Nicole Stein](#)
To: [Tiffany M. Fenix](#)
Subject: For discussion at 2:30
Date: Monday, April 8, 2024 1:14:58 PM
Attachments: [The Presidential Transition Guide 2024 \(04.2.24\).docx](#)

Attachment WIF per (b)(5)--
deliberative draft. Final is on
www.oge.gov.

Afternoon,

Hope your day is off to a good start. The Transition Guide is still in editing but I think you can start to think about the design. I am attaching the current draft and a link to the one for last year. We can discuss what we are looking for and what you can do early mock-ups of.

[https://www.oge.gov/web/oge.nsf/0/29BDCA10DAA7FFC6852585BA006B6ACC/\\$FILE/Transition%20Guide_2020.pdf](https://www.oge.gov/web/oge.nsf/0/29BDCA10DAA7FFC6852585BA006B6ACC/$FILE/Transition%20Guide_2020.pdf)

From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#)
Subject: RE: For Review: Revised Transition Guide
Date: Monday, April 1, 2024 12:37:08 PM

Thanks

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Monday, April 1, 2024 12:30 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>
Subject: FW: For Review: Revised Transition Guide

Heather and Dave,

As a reminder, we added our items to the document in the link provided in Shelley's email below. You should have that document open for our meeting today as a reminder of our changes.

Thanks,
Deb

From: Shelley K. Finlayson <[skfinlay@oge.gov](#)>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <[hajones@oge.gov](#)>; David J. Apol <[djapol@oge.gov](#)>; Deborah J. Bortot <[djbortot@oge.gov](#)>; Megan V. Granahan <[mvgranah@oge.gov](#)>; Diana Veilleux <[dveille@oge.gov](#)>; Tracy Hurston <[thurston@oge.gov](#)>; Seth Jaffe <[sjaffe@oge.gov](#)>; Christopher J. Swartz <[cjswartz@oge.gov](#)>; Nicole Stein <[nstein@oge.gov](#)>
Subject: For Review: Revised Transition Guide

Good afternoon all -

Please find a significantly reduced/reorganized draft Transition Guide at this link [\(b\)\(5\) internal OGE network at \[REDACTED\]](#) [I am providing a link to the [\(b\) \(5\)](#) because the web version of the document significantly alters the formatting.]

Please review the overall approach, whether it simply and clearly communicates the key actions we want them to take, eliminates redundancy, and includes the correct level of specificity (including whether any needed points are missing) in Section 1. Section 2 content is still being developed. Draft/partial language is included to provide an opportunity to see the topics being developed and [\(b\)\(5\) deliberative \[REDACTED\]](#). Section 3 is [\(b\)\(5\) deliberative \[REDACTED\]](#) and structured [\(b\)\(5\) deliberative \[REDACTED\]](#).

Thank you to Nicole, Seth, and Chris for their insights during our meeting this week and work on the overall structure and specific content for Section 2. I will send a meeting invitation for the week after next. Please come prepared to discuss the document and next steps to complete it.

Thanks,
Shelley

Shelley K. Finlayson (she/her)
Acting Director
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
(202) 482-9250

Visit OGE's website: www.oge.gov
Follow OGE @OfficeGovEthics

From: [Heather A. Jones](#)
To: [David J. Apol](#)
Subject: FW: For Review: Revised Transition Guide
Date: Friday, March 22, 2024 11:40:39 AM

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djortot@oge.gov>; Megan V. Granahan <mvgranah@oge.gov>; Diana Veilleux <djveille@oge.gov>; Tracy Hurston <thurston@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Christopher J. Swartz <cjswartz@oge.gov>; Nicole Stein <nstein@oge.gov>
Subject: For Review: Revised Transition Guide

Good afternoon all -

Please find a significantly reduced/reorganized draft Transition Guide at this link [\(b\)\(5\) Internal OGE network ac](#)
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Thanks,
Shelley

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U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
(202) 482-9250

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From: [Nicole Stein](#)
To: [Heather A. Jones](#)
Subject: RE: For Review: Revised Transition Guide
Date: Tuesday, March 19, 2024 12:39:23 PM

Of course -

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, March 19, 2024 12:32 PM
To: Nicole Stein <nstein@oge.gov>
Subject: RE: For Review: Revised Transition Guide

Thanks

From: Nicole Stein <nstein@oge.gov>
Sent: Tuesday, March 19, 2024 12:10 PM
To: Heather A. Jones <hajones@oge.gov>
Subject: RE: For Review: Revised Transition Guide

Heather, I've updated the invite to the 1st so that you are able to attend. (b)(6) personal to H. Jones
█

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, March 19, 2024 10:04 AM
To: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>
Cc: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For Review: Revised Transition Guide

Nicole-

I saw you scheduled the meeting (b)(6) personal to H. Jones, April 1 if you would like me to attend.

Thanks,
Heather

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Megan V. Granahan <mvgranah@oge.gov>; Diana Veilleux <djveille@oge.gov>; Tracy Hurston <thurston@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Christopher J. Swartz <cjswartz@oge.gov>; Nicole Stein <nstein@oge.gov>
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Thanks,
Shelley

Shelley K. Finlayson (she/her)
Acting Director
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
(202) 482-9250

Visit OGE's website: www.oge.gov
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From: [Shelley K. Finlayson](#)
To: [Nicole Stein](#)
Subject: RE: For Review: Revised Transition Guide
Date: Tuesday, March 19, 2024 12:07:33 PM

Let's schedule for 4/1 and those who can stay on can, if there is more to discuss.

From: Nicole Stein <nstein@oge.gov>
Sent: Tuesday, March 19, 2024 11:47 AM
To: Shelley K. Finlayson <skfinlay@oge.gov>
Subject: RE: For Review: Revised Transition Guide

There is a 30-minute window on 4/1 – otherwise, because of the program meetings, I cant find a window of time that works for everyone.

Another option, we also have the meeting next week to discuss content and then the meeting on the 1st to talk about the process for finishing this project.

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, March 19, 2024 10:04 AM
To: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>
Cc: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For Review: Revised Transition Guide

Nicole-

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Thanks,
Heather

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>; Megan V. Granahan <mvgranah@oge.gov>; Diana Veilleux <djveille@oge.gov>; Tracy Hurston <thurston@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Christopher J. Swartz <cjswartz@oge.gov>; Nicole Stein <nstein@oge.gov>
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Thanks,
Shelley

Shelley K. Finlayson (she/her)
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(202) 482-9250

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From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#)
Subject: FW: For Review: Revised Transition Guide
Date: Friday, March 15, 2024 2:18:29 PM

We should talk about this because the meeting is scheduled for (b)(6) personal to H. Jones
[REDACTED]

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djortot@oge.gov>; Megan V. Granahan <mvgranah@oge.gov>; Diana Veilleux <dveilleu@oge.gov>; Tracy Hurston <thurston@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Christopher J. Swartz <cjswartz@oge.gov>; Nicole Stein <nstein@oge.gov>
Subject: For Review: Revised Transition Guide

Good afternoon all -

Please find a significantly reduced/reorganized draft Transition Guide at this link (b)(5) internal OGE network ac
[REDACTED] [I am providing a
link to the (b)(5) internal OGE because the web version of the document significantly alters the formatting.]

Please review the overall approach, whether it simply and clearly communicates the key actions we want them to take, eliminates redundancy, and includes the correct level of specificity (including whether any needed points are missing) in Section 1. Section 2 content is still being developed. Draft/partial language is included to provide an opportunity to see the topics being developed and (b)(5) deliberative [REDACTED]. Section 3 is (b)(5) deliberative [REDACTED] and structured (b)(5) deliberative [REDACTED].

Thank you to Nicole, Seth, and Chris for their insights during our meeting this week and work on the overall structure and specific content for Section 2. I will send a meeting invitation for the week after next. Please come prepared to discuss the document and next steps to complete it.

Thanks,
Shelley

Shelley K. Finlayson (she/her)
Acting Director
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
(202) 482-9250

Visit OGE's website: www.oge.gov
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From: [Christopher J. Swartz](#)
To: [Nicole Stein](#)
Cc: [Seth Jaffe](#)
Subject: RE: For Review: Revised Transition Guide
Date: Thursday, March 14, 2024 7:20:21 PM

Yes, I can do that. I want to check back with you early next week to make sure that I am tracking what shelley and you are looking for.

Christopher J. Swartz
Senior Associate Counsel
U.S. Office of Government Ethics

(202) 482-9267
Follow OGE @OfficeGovEthics

From: Nicole Stein <nstein@oge.gov>
Sent: Thursday, March 14, 2024 6:19 PM
To: Christopher J. Swartz <cjswartz@oge.gov>
Cc: Seth Jaffe <sjaffe@oge.gov>
Subject: FW: For Review: Revised Transition Guide

Chris,

Can you start working on the draft content that is missing in the post-election part of Section II and any suggested edits based on the discussion we had on the level of content.

Perhaps, by next Wednesday. Is that reasonable, I'm not sure what else you have on your plate at the moment.

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, March 14, 2024 5:45 PM
To: Heather A. Jones <hajones@oge.gov>; David J. Apol <djapol@oge.gov>; Deborah J. Bortot <djortot@oge.gov>; Megan V. Granahan <mvgranah@oge.gov>; Diana Veilleux <dveilleu@oge.gov>; Tracy Hurston <thurston@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Christopher J. Swartz <cjswartz@oge.gov>; Nicole Stein <nstein@oge.gov>
Subject: For Review: Revised Transition Guide

Good afternoon all -

Please find a significantly reduced/reorganized draft Transition Guide at this link [\(b\)\(5\) Internal OGE network ac](#)
[I am providing a link to the [\(b\) \(5\)](#) because the web version of the document significantly alters the formatting.]

Please review the overall approach, whether it simply and clearly communicates the key actions we want them to take, eliminates redundancy, and includes the correct level of specificity (including whether any needed points are missing) in Section 1. Section 2 content is still being developed. Draft/partial language is included to provide an opportunity to see the topics being developed and

(b)(5) deliberative . Section 3 is (b)(5) deliberative
(b)(5) deliberative and structured to (b)(5) deliberative .

Thank you to Nicole, Seth, and Chris for their insights during our meeting this week and work on the overall structure and specific content for Section 2. I will send a meeting invitation for the week after next. Please come prepared to discuss the document and next steps to complete it.

Thanks,
Shelley

Shelley K. Finlayson (she/her)
Acting Director
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
(202) 482-9250

Visit OGE's website: www.oge.gov
Follow OGE @OfficeGovEthics

From: [Heather A. Jones](#)
To: [Shelley K. Finlayson](#)
Cc: [Deborah J. Bortot](#); [David J. Apol](#)
Subject: For Review: Transition Guide
Date: Monday, March 11, 2024 4:34:44 PM
Attachments: [image001.png](#)

Shelley-

The Transition Guide (Nominee Process) is ready for your review. We have had input from all stakeholders. I have left the comments that I think need to be resolved at the leadership level. One big question is whether we ^{(b)(5) deliberative} [REDACTED]

It is in the Election Readiness Team files. Here is a link to the document: [The Presidential Transition Guide 2024 - \(Nominees\).docx](#)

Please let me know if you have any questions.

Thanks,
Heather

Heather Jones (she/her/hers)
Senior Counsel for Financial Disclosure
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on X: [@OfficeGovEthics](#)

From: [Deborah J. Bortot](#)
To: [Heather A. Jones](#)
Subject: RE: For Review: Transition Guide
Date: Friday, November 17, 2023 4:54:07 PM

Heather,

I prefer the proposed order and have added my comments and edits to that document.

Thanks,
Deb

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, November 14, 2023 2:57 PM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: For Review: Transition Guide

Deb-

I have made modifications to the transition guide. The first document is keeping the current order of the information with additions. The second document reorders all of the information so that it hits the information in the way I think we want to highlight it. Please let me know if you have questions,

Current Order: (b)(5) internal OGE network address

Proposed Order: (b)(5) internal OGE network address

Thanks,
Heather

Heather Jones (she/her/hers)
Senior Counsel for Financial Disclosure
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov
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From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#)
Subject: RE: For Supervisor meeting
Date: Tuesday, February 27, 2024 9:53:21 AM

Yes, and Tracy.

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Tuesday, February 27, 2024 9:38 AM
To: Heather A. Jones <hajones@oge.gov>
Subject: RE: For Supervisor meeting

You sent the Integrity part to Diana, correct?

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, February 27, 2024 9:37 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For Supervisor meeting

The Integrity part it. I have been working on the other Parts over the last few days and hope to get them out to others soon.

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Tuesday, February 27, 2024 9:24 AM
To: Heather A. Jones <hajones@oge.gov>
Subject: For Supervisor meeting

Hi Heather,

Is the Transition Guide with the various program people for edits?

Thanks,
Deb

From: [Deborah J. Bortot](#)
To: [Heather A. Jones](#)
Subject: RE: For supervisor meeting
Date: Tuesday, February 6, 2024 11:20:58 AM

I will

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, February 6, 2024 11:21 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For supervisor meeting

I think it might be helpful to mention it has been completely restructured with less focus on the nominee program.

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Tuesday, February 6, 2024 11:19 AM
To: Heather A. Jones <hajones@oge.gov>
Subject: RE: For supervisor meeting

Thank you. Is there anything you want me to say or ask about it on the supervisor call?

From: Heather A. Jones <hajones@oge.gov>
Sent: Tuesday, February 6, 2024 11:15 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For supervisor meeting

Shelley

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Tuesday, February 6, 2024 11:09 AM
To: Heather A. Jones <hajones@oge.gov>
Subject: For supervisor meeting

Who is the Transition guide with now?

From: [Diana Veilleux](#)
To: [Nicole Stein](#); [Deborah J. Bortot](#); [Seth Jaffe](#)
Subject: RE: For your review: FW: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29
Date: Wednesday, November 15, 2023 10:54:26 AM

Hi Nicole

Not sure I responded either. I don't have any concerns or comments.

Best,

Diana

From: Nicole Stein <nstein@oge.gov>
Sent: Wednesday, November 15, 2023 8:34 AM
To: Deborah J. Bortot <djbortot@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Diana Veilleux <djveille@oge.gov>
Subject: RE: For your review: FW: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29

Thanks – we sent back a modified version of that sentence.

From: Deborah J. Bortot <djbortot@oge.gov>
Sent: Tuesday, November 14, 2023 6:36 PM
To: Seth Jaffe <sjaffe@oge.gov>; Nicole Stein <nstein@oge.gov>; Diana Veilleux <djveille@oge.gov>
Subject: RE: For your review: FW: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29

Nicole,

I apologize, but I do not think I ever replied to this. I am fine with the changes, but think Seth makes a good point about (b)(5) deliberative

Thanks,
Deb

From: Seth Jaffe <sjaffe@oge.gov>
Sent: Wednesday, November 8, 2023 3:01 PM
To: Nicole Stein <nstein@oge.gov>; Diana Veilleux <djveille@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: For your review: FW: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29

Hi Nicole,

The comments in green below look good to me. The redlines contained in – Chapter II Planning – also make it better.

I will note that the text in green under “(b)(5) deliberative

[REDACTED]

Also, I defer to Shelley for the text in green currently under Chapter 3 – if that is what she said - but I am not sure I fully understand what (b)(5) deliberative

[REDACTED]

Overall, I think that generally, the text in green should add valuable information to their report.

Thanks,
Seth

From: Nicole Stein <nstein@oge.gov>

Sent: Wednesday, November 8, 2023 2:10 PM

To: Diana Veilleux <dveille@oge.gov>; Seth Jaffe <sjaffe@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>

Subject: For your review: FW: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29

Shelley asked me to ask you to review the responses below and let me know if you have any concerns by mid-day Monday. I've asked for the full document but I'm not sure I'll get that before I leave.

We've already made some edits – the strikeouts and red text.

From: Chantelle Renn <CRenn@ourpublicservice.org>

Sent: Tuesday, October 31, 2023 5:35 PM

To: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>

Cc: Valerie Boyd <vboyd@ourpublicservice.org>; Sasha Blachman <SBlachman@ourpublicservice.org>; Paul Hitlin <PHitlin@ourpublicservice.org>

Subject: Request to use and attribute content in revised agency transition guide + invite to Center 2024 kick off reception on 11/29

Hi Shelley and Nicole,

Thanks for meeting with us in late September to inform our agency transition guide refresh. As you may recall, we are working with our BCG partners to refresh the guide to include new examples and changes from 2020-21. We plan to have this guide finalized the week of Nov.

13, which I realize is fast approaching. The guide will be available on the Center's website and I'll send you the link.

We are in the final stages of development and are **seeking permission for the use of content from two of our interviews i.e.**, our September conversation, and back in 2021 for our lessons learned report. We have attributed content to you in two places, alongside unattributed text (see green text below). We are open to any suggested edits to ensure that you feel your experience and our conversation is accurately represented. I can send you a confidential draft of the full guide if you would like additional context. The current version of the guide is located [here](#).

We kindly request your approval via return email by end of day Tuesday, Nov. 14:

1. **To use content (below in green text) in the published Agency Transition Guide.**
2. **To include your names as a contributor at the end of the guide.**

We are also open to non-attribution if attribution isn't an option for you.

On a related note, I wanted to share an invite to the Center's [2024 Kickoff event](#), which will take place on **November 29, 2023, 6 – 8 p.m.**, at the Partnership's event space. More details, including a registration link are on our [event page](#).

Thanks again, Shelley and Nicole.

Chantelle

////

Agency Transition Guide - 3rd Edition Updates (OGE)

Chapter 1: Organizing

Section: Building the Team

Subheading: Selecting the agency transition director

In small agencies, the agency transition director often leads transition efforts in addition to other formal roles. In these cases, information about the transition director's role and responsibilities should be communicated across the agency, including the defined time-period that activities will be carried out and what activities will be performed.

Subheading: Rounding out the core team

Similarly, Shelley Finlayson, acting director, chief of staff and program counsel at the Office of Government Ethics, highlighted the value of including a designated agency ethics official on an agency's core transition team: "Agencies need the right team pulled together internally to know what risks, questions, and challenges they're facing. There are many cross-functional

aspects of this process, [including] assessing from an ethics perspective whether they're prepared to head into this period."

Chapter 2 - Planning

Section: Preparing a Work Plan

Subheading: Post-election

Agencies that prepare for remote work by investing in modern business processes – such as online fillable forms and secure document management systems – find it easier to onboard appointees or share information with new leaders remotely. For example, prior to 2020, the Office of Government Ethics had created Integrity.gov—a ~~website~~ **web-based electronic filing system** that allows **for the** electronic completion and review of political appointee **financial disclosures** ~~paperwork~~. Having this ~~website~~ **system** already in place meant OGE could keep core business functions running smoothly despite moving to virtual operations during the 2020-21 transition.

Chapter 3 - People

Section: Incoming Administration

Subheading: Supporting the confirmation process and integrating new political appointees

Agency transition teams can support confirmation preparations by:

- Communicating with appointees and the transition team about the status of nominees in the pre-confirmation process via a dashboard or other tracking tools.

Chapter 4 - Communication

Section: Planning

Subheading: Engaging internal audiences

The agency transition team will want to find the balance between over-communicating, which can distract from the agency's core missions, and leaving staff in the dark. The election circumstances are an important part of that balance. Has the president served two terms, or is the president seeking re-election? **In the latter case, the agency transition team will want to be especially sensitive in how it communicates the issues involved in transition planning. In some cases, career agency leaders will use the term "election readiness" rather than "transition planning" to refer to required pre-election activities because the phrase does not presuppose an election outcome that creates a change in leadership.**

From: [Shelley K. Finlayson](#)
To: [Nicole Stein](#)
Subject: RE: For Your Review: The Presidential Transition Guide
Date: Thursday, December 14, 2023 9:37:59 AM

Yes, sounds good. Let's try this afternoon

From: Nicole Stein <nstein@oge.gov>
Sent: Thursday, December 14, 2023 9:37 AM
To: Shelley K. Finlayson <skfinlay@oge.gov>
Subject: RE: For Your Review: The Presidential Transition Guide

I've reviewed and have some thoughts. I can schedule time later this afternoon or Monday if you prefer.

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, December 14, 2023 8:40 AM
To: Nicole Stein <nstein@oge.gov>
Subject: FW: For Your Review: The Presidential Transition Guide

Will you please also review this and give me your thoughts? Thanks

From: Heather A. Jones <hajones@oge.gov>
Sent: Wednesday, December 13, 2023 4:46 PM
To: Shelley K. Finlayson <skfinlay@oge.gov>
Cc: Deborah J. Bortot <djbortot@oge.gov>; David J. Apol <djapol@oge.gov>
Subject: For Your Review: The Presidential Transition Guide

Shelley-

The word version of the Presidential Transition Guide is ready for your review. It is reorganized and has a new section on resources for WH ethics officials. It is not redlined because the reorganization would mean that most of the document would be in redline. Please let me know if you have any questions or would like to meet to discuss anything.

(b)(5) internal OGE network address



Thanks,
Heather

Heather Jones (she/her/hers)
Senior Counsel for Financial Disclosure
(202) 482-9316
U.S. Office of Government Ethics

Visit OGE's website: www.oge.gov
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From: [Nicole Stein](#)
To: [Shelley K. Finlayson](#)
Subject: RE: For Your Review: The Presidential Transition Guide
Date: Thursday, December 14, 2023 8:40:07 AM

Can do.

From: Shelley K. Finlayson <skfinlay@oge.gov>
Sent: Thursday, December 14, 2023 8:40 AM
To: Nicole Stein <nstein@oge.gov>
Subject: FW: For Your Review: The Presidential Transition Guide

Will you please also review this and give me your thoughts? Thanks

From: Heather A. Jones <hajones@oge.gov>
Sent: Wednesday, December 13, 2023 4:46 PM
To: Shelley K. Finlayson <skfinlay@oge.gov>
Cc: Deborah J. Bortot <djbortot@oge.gov>; David J. Apol <djapol@oge.gov>
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(b)(5) internal OGE network address



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Heather

Heather Jones (she/her/hers)
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(202) 482-9316
U.S. Office of Government Ethics

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Follow OGE on X: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: [Shelley K. Finlayson](#)
To: [Heather A. Jones](#)
Cc: [Deborah J. Bortot](#); [David J. Apol](#)
Subject: RE: For Your Review: The Presidential Transition Guide
Date: Wednesday, December 13, 2023 5:06:51 PM

Thanks, Heather.

I will take a look and let you know if I have any questions.

Shelley

From: Heather A. Jones <hajones@oge.gov>
Sent: Wednesday, December 13, 2023 4:46 PM
To: Shelley K. Finlayson <skfinlay@oge.gov>
Cc: Deborah J. Bortot <djborot@oge.gov>; David J. Apol <djapol@oge.gov>
Subject: For Your Review: The Presidential Transition Guide

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The word version of the Presidential Transition Guide is ready for your review. It is reorganized and has a new section on resources for WH ethics officials. It is not redlined because the reorganization would mean that most of the document would be in redline. Please let me know if you have any questions or would like to meet to discuss anything.

(b)(5) internal OGE network address



Thanks,
Heather

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Senior Counsel for Financial Disclosure
(202) 482-9316
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Follow OGE on X: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: [Heather A. Jones](#)
To: [Deborah J. Bortot](#)
Subject: RE: Guide for Transition Team 6.24.2020 for Tiffany.docx
Date: Wednesday, September 27, 2023 10:25:46 AM

It was the last word version that I have

From: Deborah J. Bortot
Sent: Tuesday, September 26, 2023 10:05 PM
To: Heather A. Jones <hajones@oge.gov>
Subject: RE: Guide for Transition Team 6.24.2020 for Tiffany.docx

Why are you going from this version? This doesn't appear to be the final version.

From: Heather A. Jones
Sent: Tuesday, September 26, 2023 10:14 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: Guide for Transition Team 6.24.2020 for Tiffany.docx

Word version of the transition guide for our meeting tomorrow.

Attachment WIF per (b)(5)--
deliberative draft. Final is on
www.oge.gov.

From: [Suzanne L. Meyer](#)
To: [Nicole Stein](#)
Subject: RE: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]
Date: Tuesday, February 20, 2024 5:04:11 PM
Attachments: [SLM edits U.S. Office of Government Ethics 2025 CBJ and APP \(for OMB\) \(002\).docx](#)

Attachment WIF per (b)(5)--
deliberative draft. Final is
released above.

Hi Nicole,

I realize the document you had sent said "Read only" so I saved a copy and worked off of that. Please see attached.

Thanks,

Suzanne

From: Suzanne L. Meyer <slmeyer@oge.gov>
Sent: Friday, February 16, 2024 1:34 PM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

From: Nicole Stein <nstein@oge.gov>
Sent: Monday, February 12, 2024 12:28 PM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

Suzanne, I briefly mentioned during our call this morning that I was going to resend you the CBJ and APR to review again. At this stage the document has been reviewed by OMB for content (we mentioned to them that it has not been proofread) and approved. Can you review to make sure we did not introduce any spelling/grammar/inconsistency errors as we modified some of the text?

If you could have something to me by next Tuesday, I'd appreciate it. Thanks.

From: Diana Veilleux <djveille@oge.gov>
Sent: Thursday, February 8, 2024 10:34 AM
To: 'Cogen, Alyssa N. EOP/OMB' <(b) (6)>
Cc: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>; Gilbert Carlson <gcarlson@oge.gov>; Grant Anderson <ganderso@oge.gov>; (b)(6) B Skidmore's email <(b)(6) B Skidmore's email>
Subject: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

CONTROLLED

Attachments contain CUI.

When attachments are removed, this email is uncontrolled unclassified information. The attachments contain CUI.

Good Morning Alyssa

Attached please find updated drafts of the Office of Government Ethics' FY 2025 Congressional Budget Justification and Annual Performance Plan and FY 2023 Annual Performance Report, which are being provided for final review and clearance. In an effort to get these documents to you early, we forwent our usual step of having a final proofread before submission so please ignore any typos. Also, we are still working on adding visuals for the final APR. Of course, we will take both of those steps before we finalize the documents, as well as make any revisions you suggest.

Please let me know if you have any questions about these documents, and when we are cleared to submit them to Congress. As ever, we thank you for your consideration of OGE's budget needs.

Best regards,

Diana J. Veilleux

Diana J. Veilleux (she/her/hers)

Chief

Legal, External Affairs and Performance Branch

Program Counsel Division

Office of Government Ethics

(202) 482-9203

Diana.veilleux@oge.gov

Visit OGE's website at: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: [Suzanne L. Meyer](#)
To: [Nicole Stein](#)
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]
Date: Tuesday, February 20, 2024 5:02:03 PM
Attachments: [U.S. Office of Government Ethics 2023 APR \(for OMB\).docx](#)
[U.S. Office of Government Ethics 2025 CBJ and APP \(for OMB\) .docx](#)

First attachment is a nonresponsive record. Second attachment is a deliberative draft WIF per (b)(5). The final version is released above.

Hi Nicole,

The CBJ document has been reviewed.

Thanks,

Suzanne

From: Suzanne L. Meyer <slmeyer@oge.gov>
Sent: Friday, February 16, 2024 1:34 PM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

From: Nicole Stein <nstein@oge.gov>
Sent: Monday, February 12, 2024 12:28 PM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

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Sent: Thursday, February 8, 2024 10:34 AM
To: 'Cogen, Alyssa N. EOP/OMB' <(b) (6)>
Cc: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>; Gilbert Carlson <gcarlson@oge.gov>; Grant Anderson <ganderso@oge.gov>; (b)(6) B Skidmore's email <(b)(6) B Skidmore's email>
>
Subject: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

CONTROLLED

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Please let me know if you have any questions about these documents, and when we are cleared to submit them to Congress. As ever, we thank you for your consideration of OGE's budget needs.

Best regards,

Diana J. Veilleux

Diana J. Veilleux (she/her/hers)

Chief

Legal, External Affairs and Performance Branch

Program Counsel Division

Office of Government Ethics

(202) 482-9203

Diana.veilleux@oge.gov

Visit OGE's website at: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: [Suzanne L. Meyer](#)
To: [Nicole Stein](#)
Subject: RE: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]
Date: Tuesday, February 20, 2024 10:08:31 AM
Attachments: [SLM edits U.S. Office of Government Ethics 2023 APR \(for OMB\).docx](#)

Attachment is a deliberative draft WIF per (b)(5). The final version is released above.

Hi Nicole,

I was working off of the copy so I don't think it saved on the original (I did a comparison at one point). Auto save takes getting used to!

Thanks,

Suzanne

From: Nicole Stein <nstein@oge.gov>
Sent: Monday, February 12, 2024 12:28 PM
To: Suzanne L. Meyer <slmeyer@oge.gov>
Subject: FW: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

Suzanne, I briefly mentioned during our call this morning that I was going to resend you the CBJ and APR to review again. At this stage the document has been reviewed by OMB for content (we mentioned to them that it has not been proofread) and approved. Can you review to make sure we did not introduce any spelling/grammar/inconsistency errors as we modified some of the text?

If you could have something to me by next Tuesday, I'd appreciate it. Thanks.

From: Diana Veilleux <djveille@oge.gov>
Sent: Thursday, February 8, 2024 10:34 AM
To: 'Cogen, Alyssa N. EOP/OMB' <(b) (7)(A), (b) (6)>
Cc: Shelley K. Finlayson <skfinlay@oge.gov>; Nicole Stein <nstein@oge.gov>; Gilbert Carlson <gcarlson@oge.gov>; Grant Anderson <ganderso@oge.gov>; (b)(6) B Skidmore's email <(b)(6)>
Subject: Office of Government Ethics Budget and Performance Documents [Attachments Contain CUI]

CONTROLLED

Attachments contain CUI.

When attachments are removed, this email is uncontrolled unclassified information. The attachments contain CUI.

Good Morning Alyssa

Attached please find updated drafts of the Office of Government Ethics' FY 2025 Congressional Budget Justification and Annual Performance Plan and FY 2023 Annual Performance Report, which are being provided for final review and clearance. In an effort to get these documents to you early, we forwent our usual step of having a final proofread before submission so please ignore any typos. Also, we are still working on adding visuals for the final APR. Of course, we will take both of those steps before we finalize the documents, as well as make any revisions you suggest.

Please let me know if you have any questions about these documents, and when we are cleared to submit them to Congress. As ever, we thank you for your consideration of OGE's budget needs.

Best regards,

Diana J. Veilleux

Diana J. Veilleux (she/her/hers)

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