

Presentation Handout

CY17 Annual Agency Ethics Program Questionnaire: *Benchmarking Your Agency*

August 30, 2018

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CY17 Annual Agency Ethics Program Questionnaire: Benchmarking Your Agency

Notes on Data and Methodology

Notes Source Data

- The charts in this document are based on agency responses to the 2017 Annual Agency Ethics Program Questionnaire. Individual agency responses are available [here](#), and the summary report, which aggregates the data, is available [here](#).
- The charts do not include agencies for which the relevant information was classified.

Notes on Data Quality

- OGE reviews agency responses to selected questions within the Questionnaire to identify potential anomalies. If an anomaly is found, OGE follows up with the agency; however, OGE does not independently verify the submitted information.

Notes on Methodology

- The charts in this document illustrate the ratios of certain data points per **one full time equivalent ethics official**:
 - Ratio of full time employees per one full-time equivalent ethics official
 - Ratio of required 278 reports per one full-time equivalent ethics official
 - Ratio of required 450 reports per one full-time equivalent ethics official
 - Ratio of employees required to receive initial ethics training per one equivalent full-time ethics official
 - Ratio of employees required to receive annual ethics training per one full-time ethics official
- OGE calculated the **full time equivalent ethics official** based on an agency's response to question #5 in the Questionnaire.

Example: The table below provides an example of an agency with 13 employees who performed ethics program duties in 2017.

	Approximate amount of time spent each week performing ethics duties					
Duty Station	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	TOTAL
D.C. Metro area	1	0	2	2	1	6
Outside the D.C. Metro area	1	3	3	0	0	7
TOTAL	2	3	5	2	1	13

In this example, the agency has the equivalent of 5.8 full time ethics officials:

$$(2 \times .025) + (3 \times .25) + (5 \times .5) + (2 \times .75) + (1 \times 1) = 5.8$$

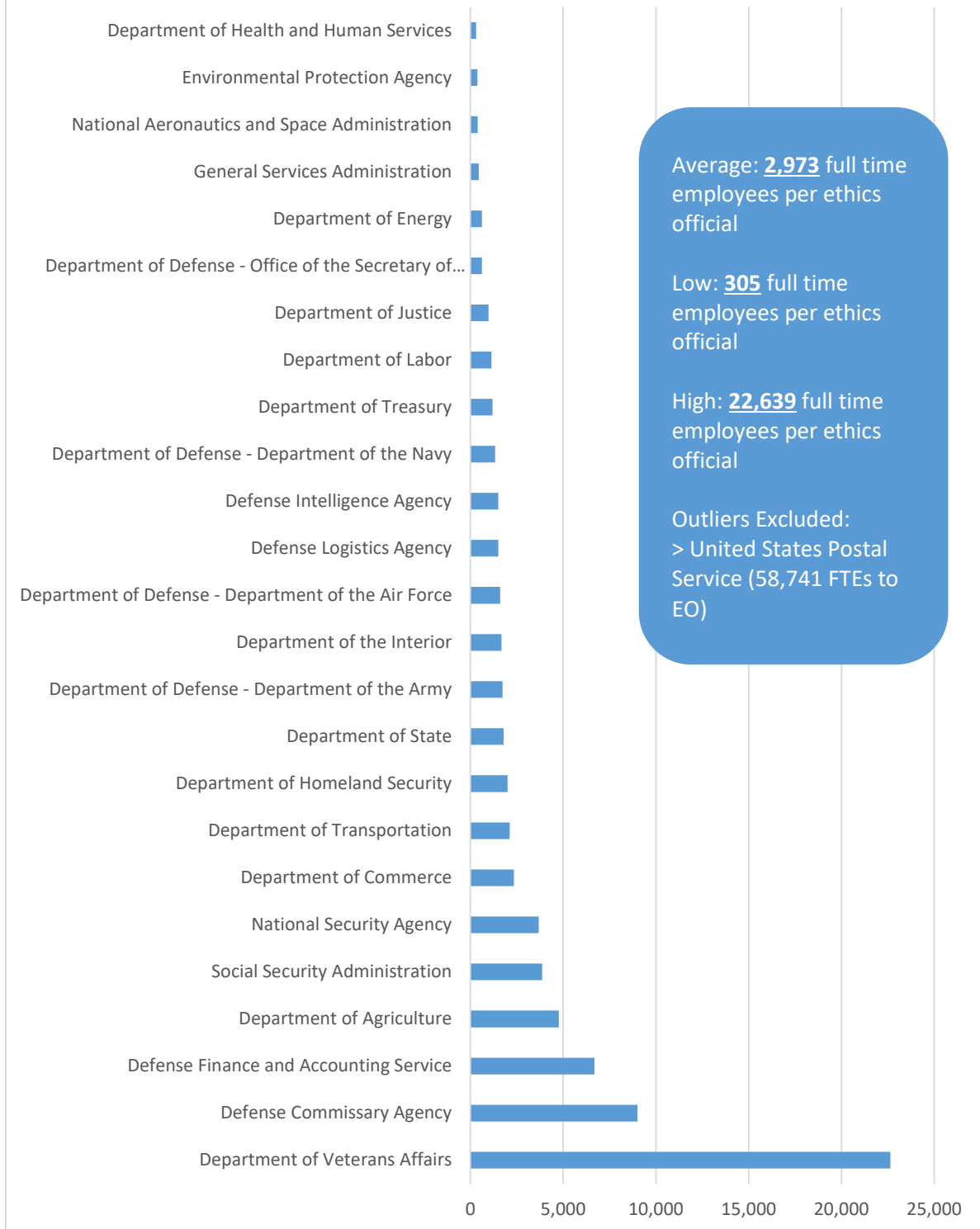
- The ratios are based on agency responses to the following Questionnaire questions:
 - full time employees, as of 12/31/17: question #2
 - public financial disclosure filers (OGE Form 278e): question #46
 - confidential financial disclosure filers: question #61
 - initial ethics training: question #24
 - annual ethics training: question #34
- Keep in mind that some agencies have the equivalent of less than one full time ethics official. In those cases, the ratio does *not* reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.
- If an agency reported zero ethics officials for 2017, then there is no ratio for that agency, and they are not included in the charts or the averages.
- “Outliers” are defined as agencies whose ratio is more than two standard deviations from the mean.

Ethics Program Self-Assessment Worksheet

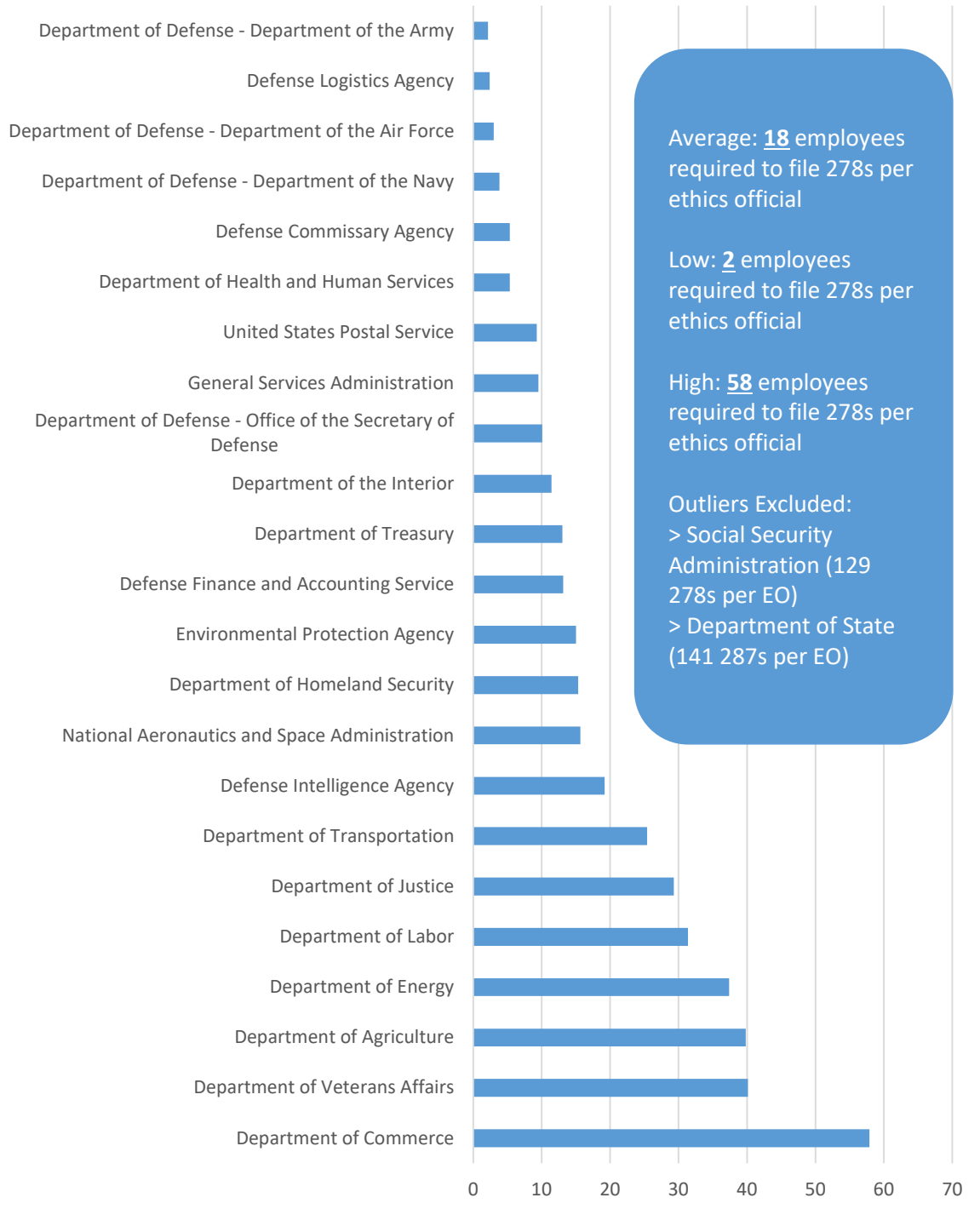
Program Element	Benchmark Ratios (Source: Annual Questionnaire)	Compliance Indicators (Source: Annual Questionnaire and Agency Records)	Other Indicators (Source: Agency Records)	Assessment & Action Item
Example: Initial Ethics Training	<p><i>Our ratio: ~260 IET trainees per FTE ethics official</i></p> <p><i>Average ratio for our cohort: 97</i></p> <p><i>Our rank in the cohort: 38</i></p>	<p><i>Percentage trained within 3-month deadline: 85%</i></p> <p><i>Exec branch percentage: 91%</i></p> <p><i>Percentage of employees trained after 3 months: 15%</i></p>	<p><i>70% of employees report better understanding their ethics obligations after taking training</i></p>	<p><i>Increase 3-month compliance rate: Identify and address the reasons for late training</i></p> <p><i>Increase the training comprehension: Follow up with those who reported they didn't have a better understanding after training and ask for feedback</i></p>
Initial Ethics Training	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Percentage trained within 3-months_____</p> <p>Percentage of employees trained after 3 months_____</p>	<p>Examples:</p> <ul style="list-style-type: none"> * Percent of employees who better understanding their ethics obligations after taking training * Number of questions received after training 	
Annual Ethics Training	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Compliance rate_____</p>	<p>Examples (see above)</p>	
Confidential Financial Disclosure	<p>Our ratio_____</p> <p>Average ratio for our cohort_____</p> <p>Our rank in the cohort_____</p>	<p>Filing compliance rate_____</p> <p>Percentage reviewed within 60 days_____</p> <p>Percentage certified within 60 days _____</p>	<p>Examples:</p> <ul style="list-style-type: none"> * Typical complexity of 450s * # of counseling memos issued * Use of alternative 450 form * Use of intermediate review * Experience level of reviewers * Ability to allocate more reviewers during filing season 	
Public Financial	<p>Our ratio_____</p>	<p>Filing compliance rate_____</p>	<p>Examples (see above)</p>	

Disclosure	Average ratio for our cohort____ Our rank in the cohort____	Percentage reviewed within 60 days____ Percentage certified within 60 days ____		
Advice and Counsel	Our ratio____ Average ratio for our cohort____ Our rank in the cohort____		* Average # of requests for guidance each year____ * Timeliness of guidance ____ * Experience level of ethics staff * Counselor satisfaction data	

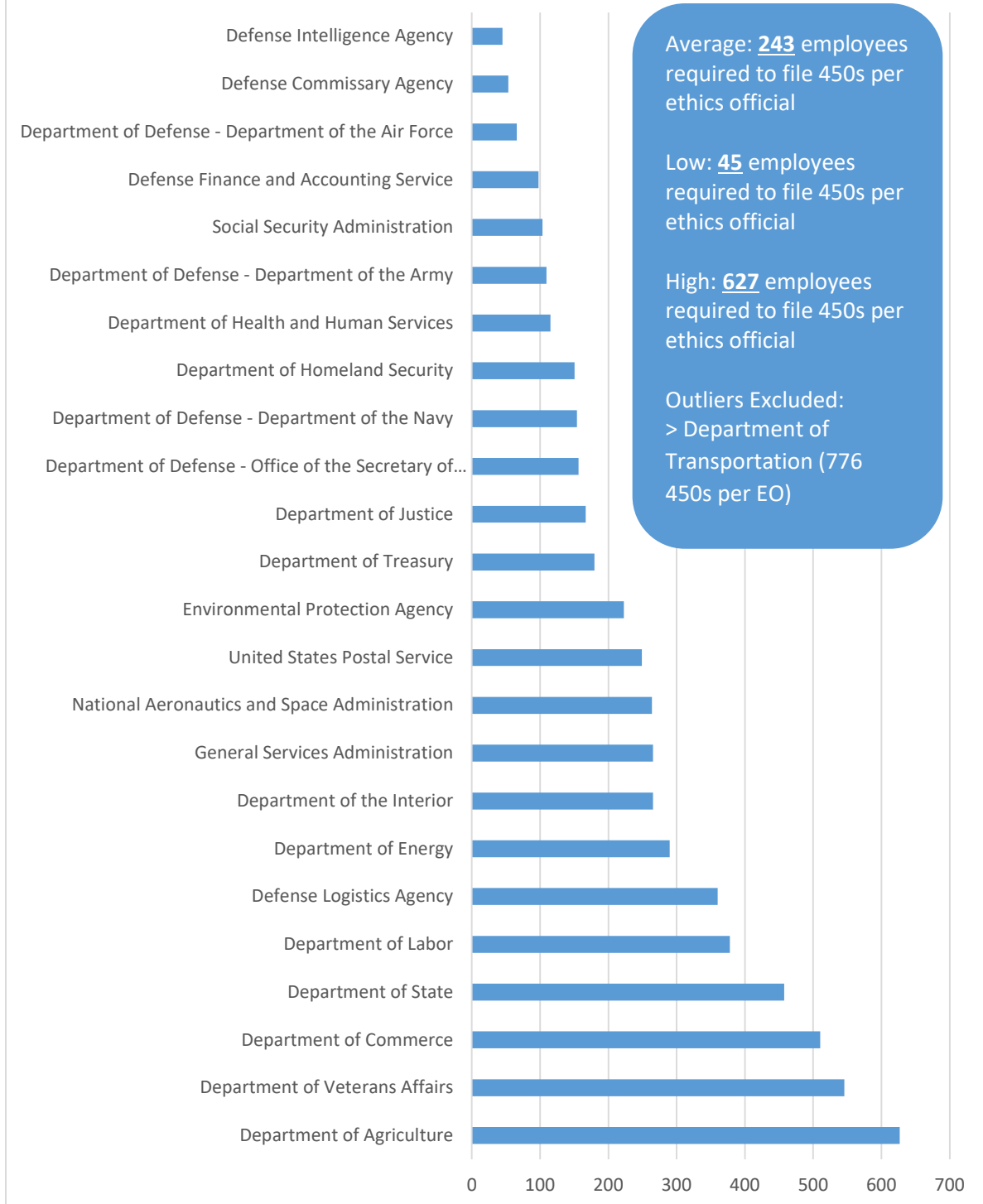
Agencies with 10,000 or More Full Time Employees: Ratio of Full Time Employees per Ethics Official



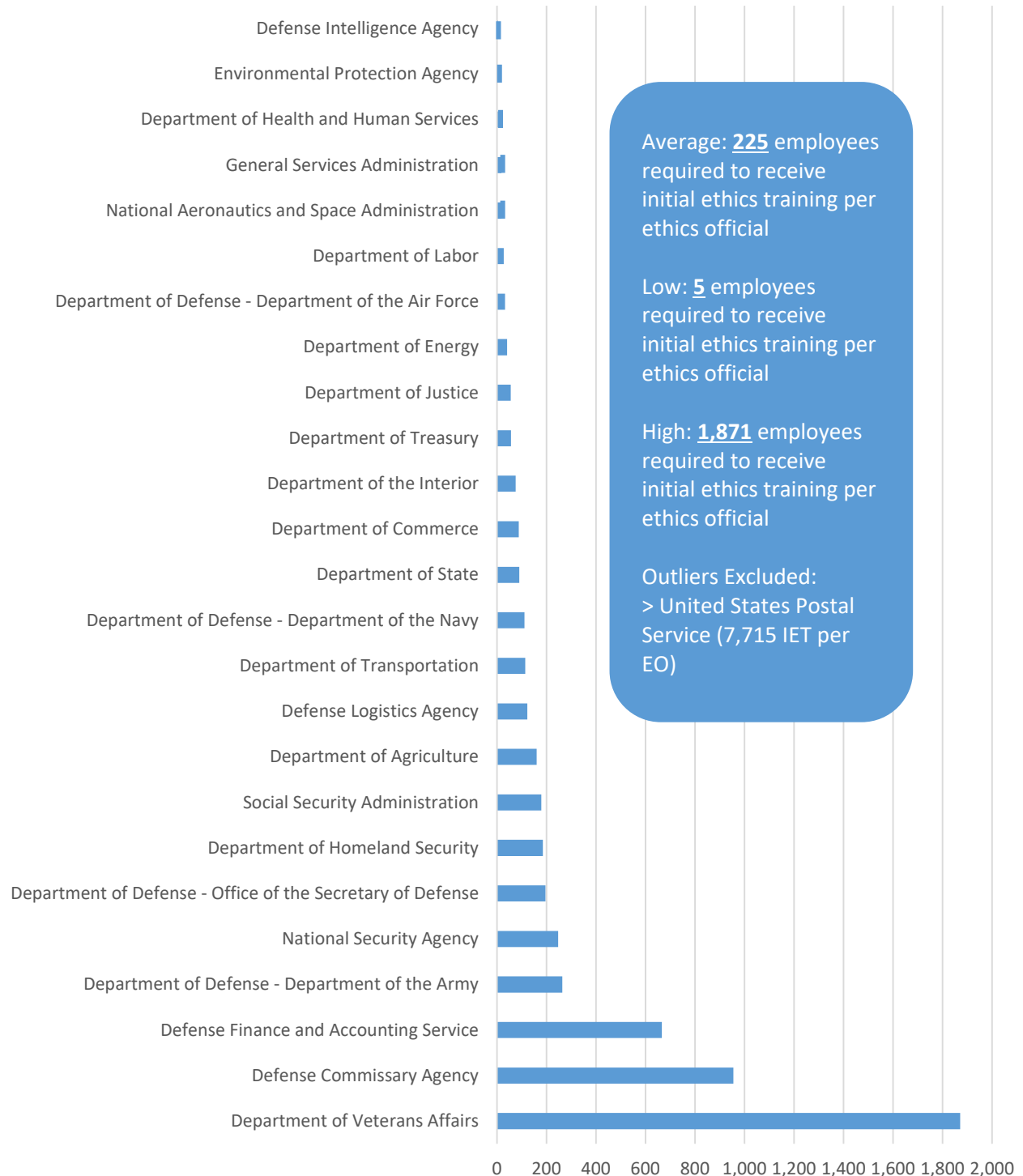
Agencies with 10,000 or More Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



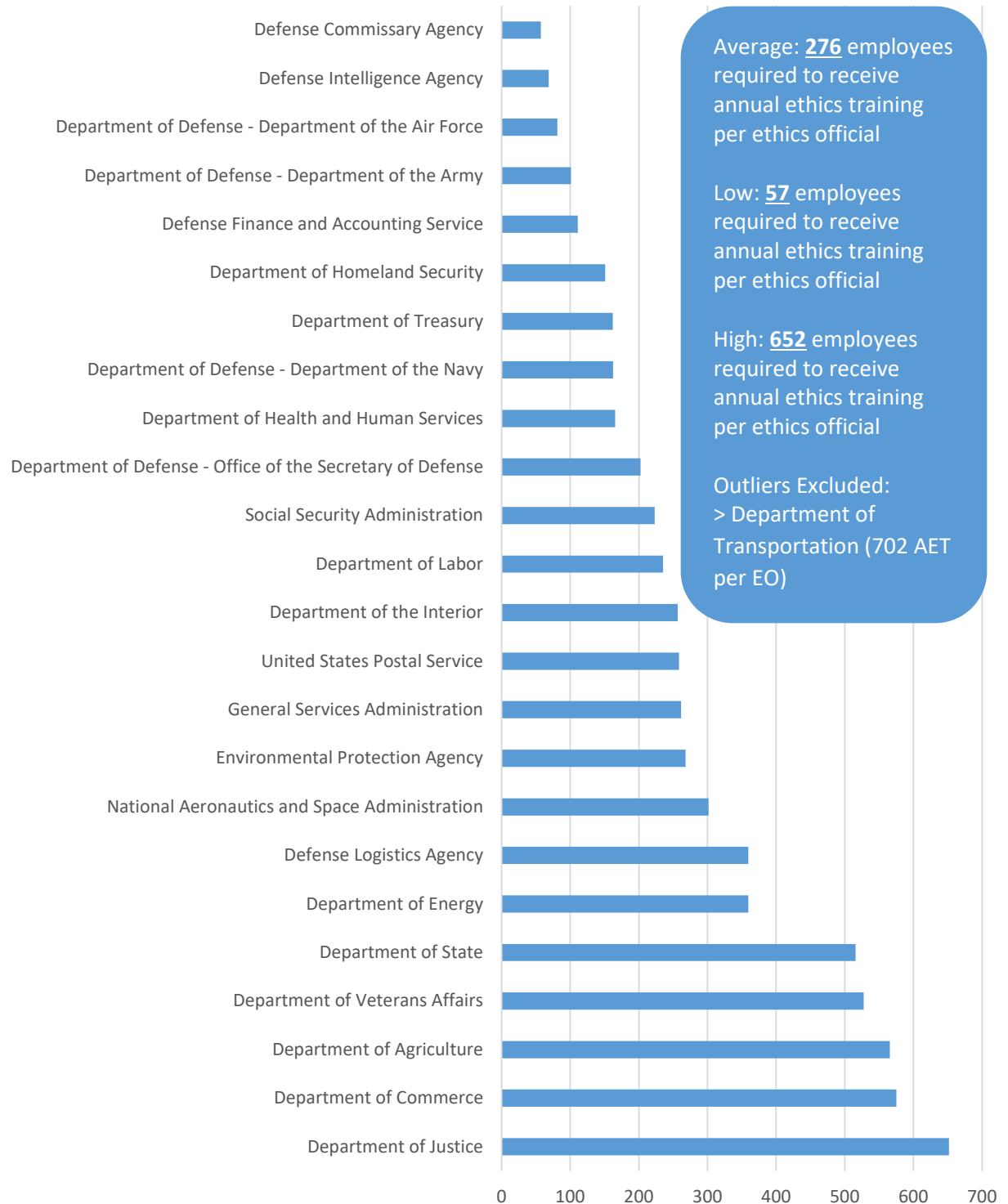
Agencies with 10,000 or More Full Time Employees: Ratio of Required Confidential Financial (450) Reports per Ethics Official



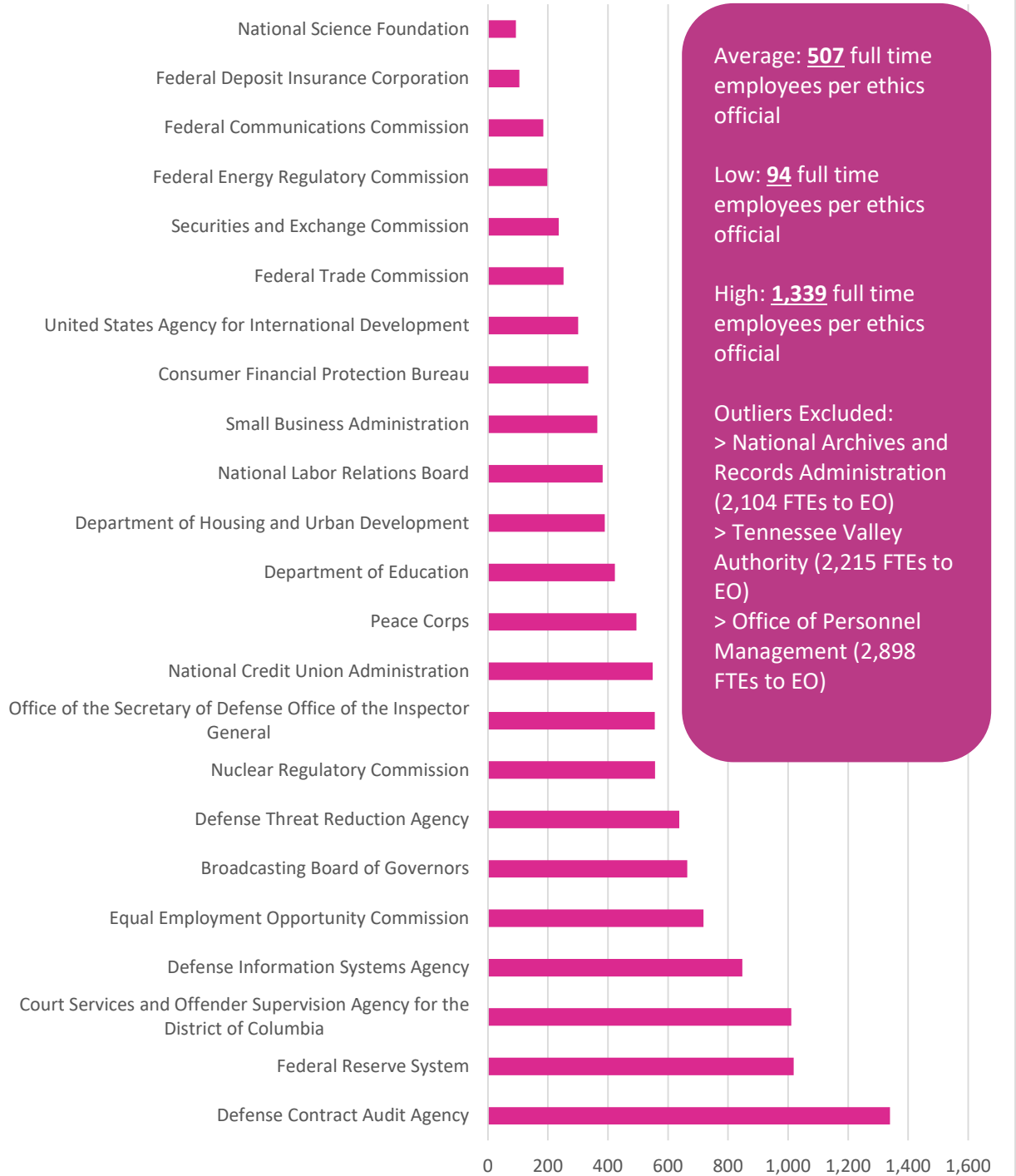
Agencies with 10,000 or More Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



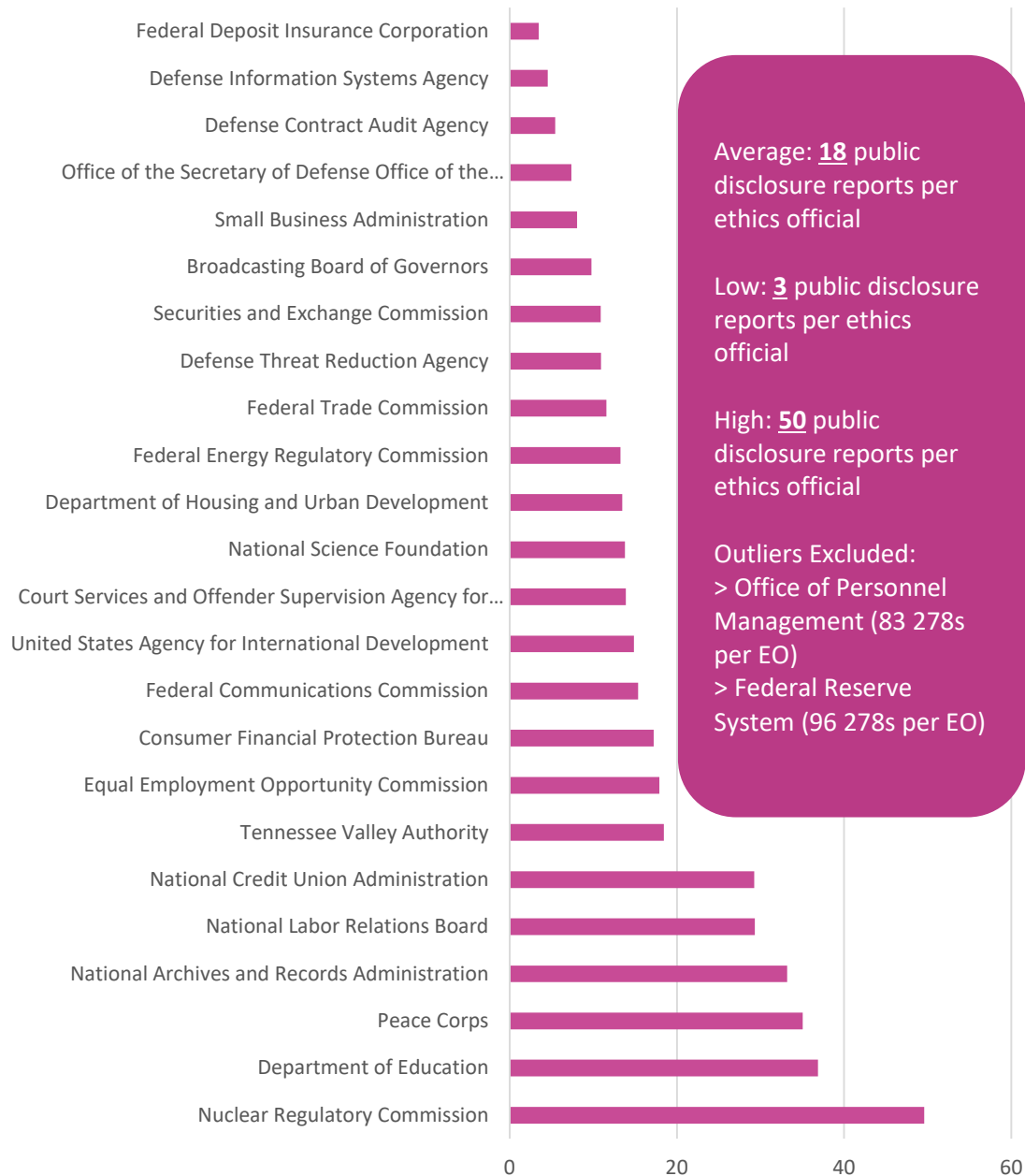
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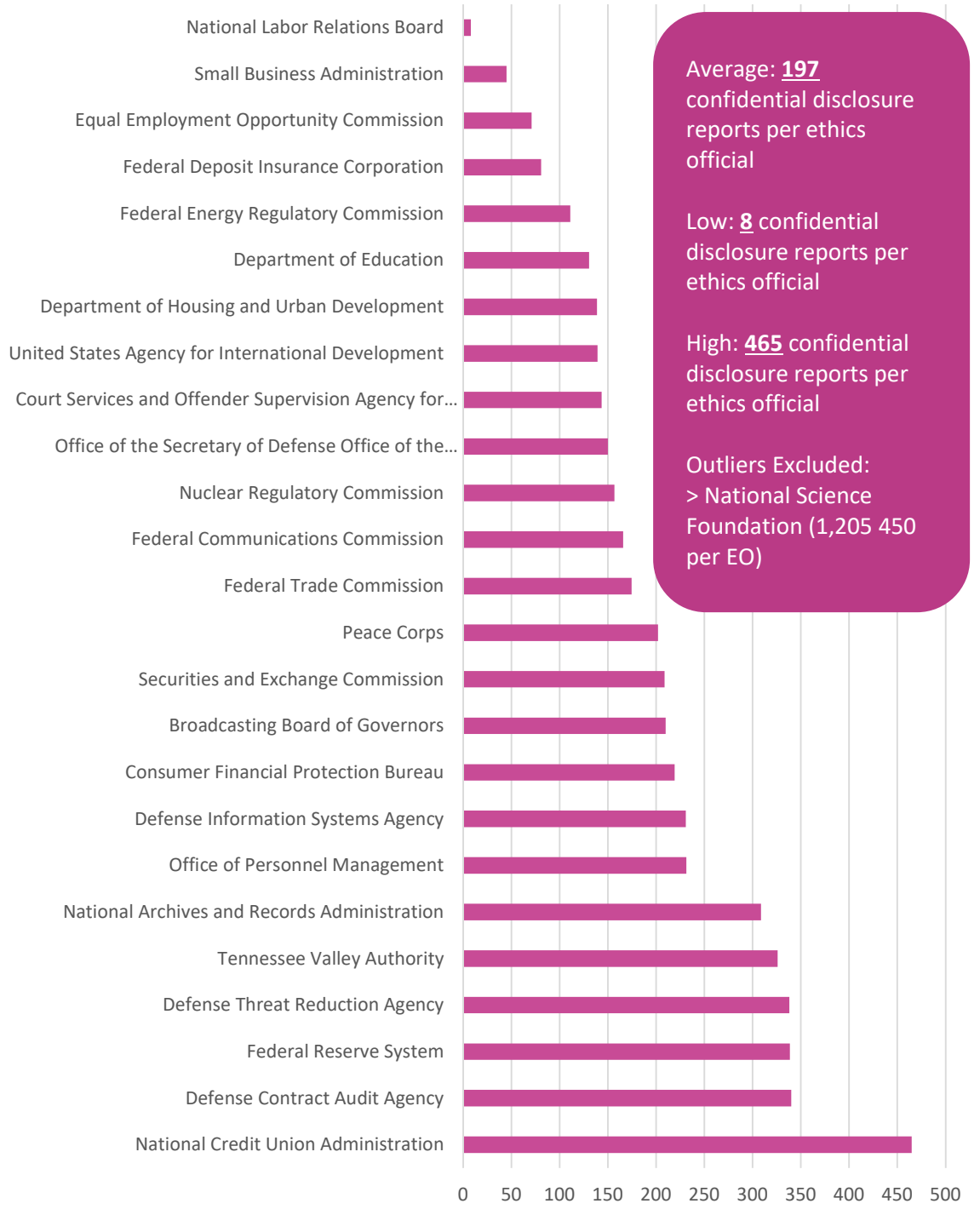
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Full Time Employees per Ethics Official



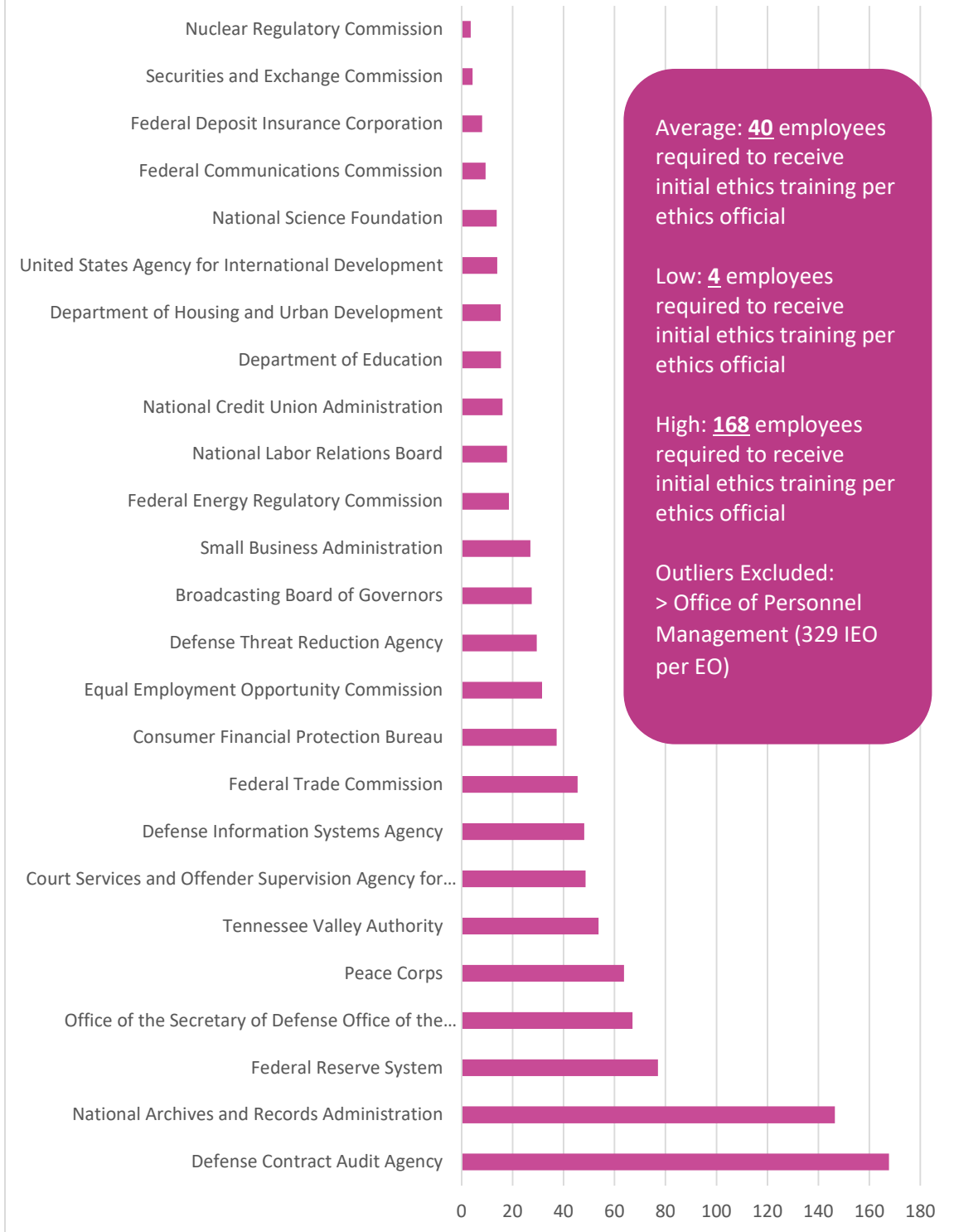
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



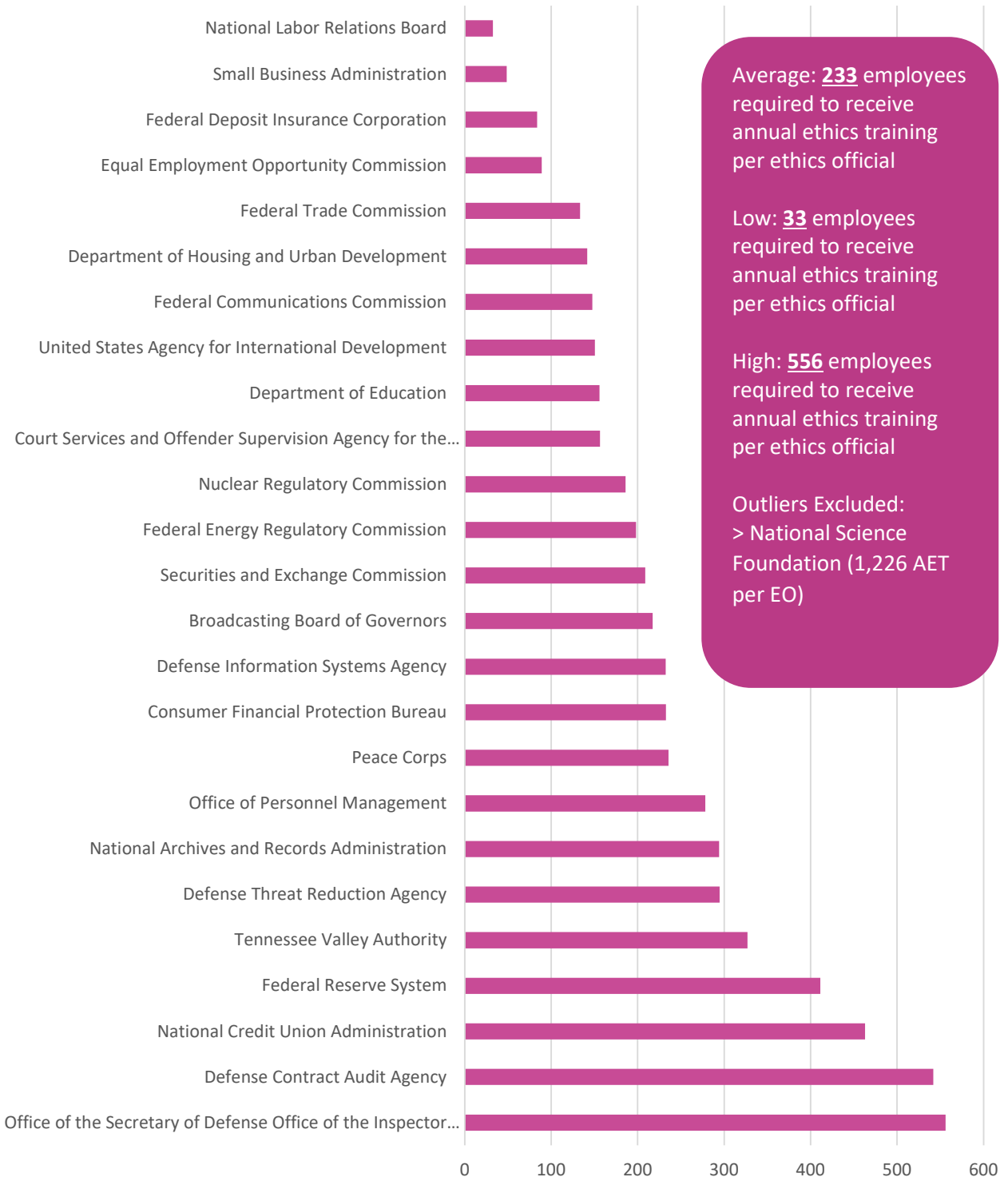
Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



Agencies with 1,000 to 9,999 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



Agencies with 100 to 999 Full Time Employees: Ratio of Full Time Employees per Ethics Official



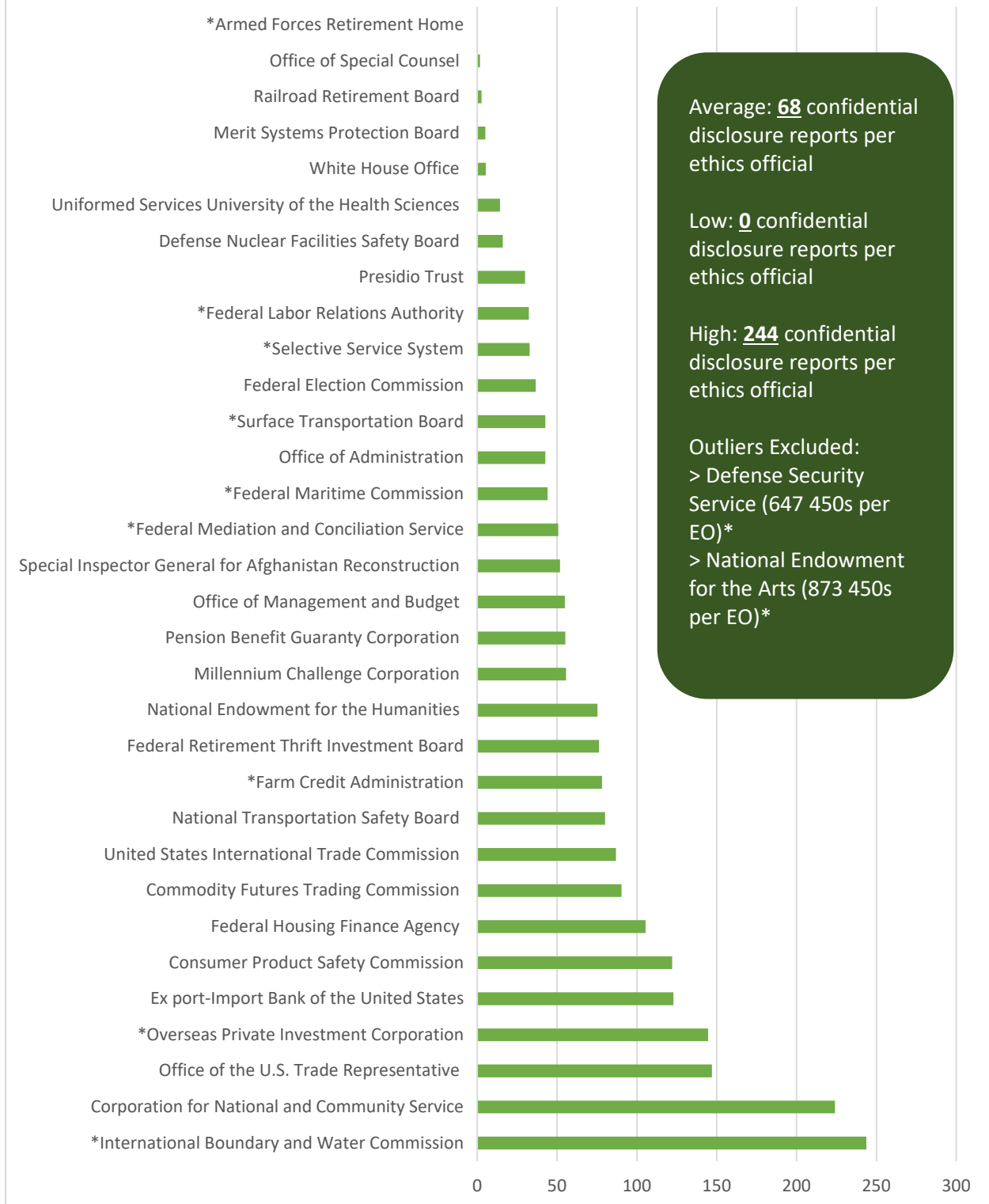
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agencies with 100 to 999 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



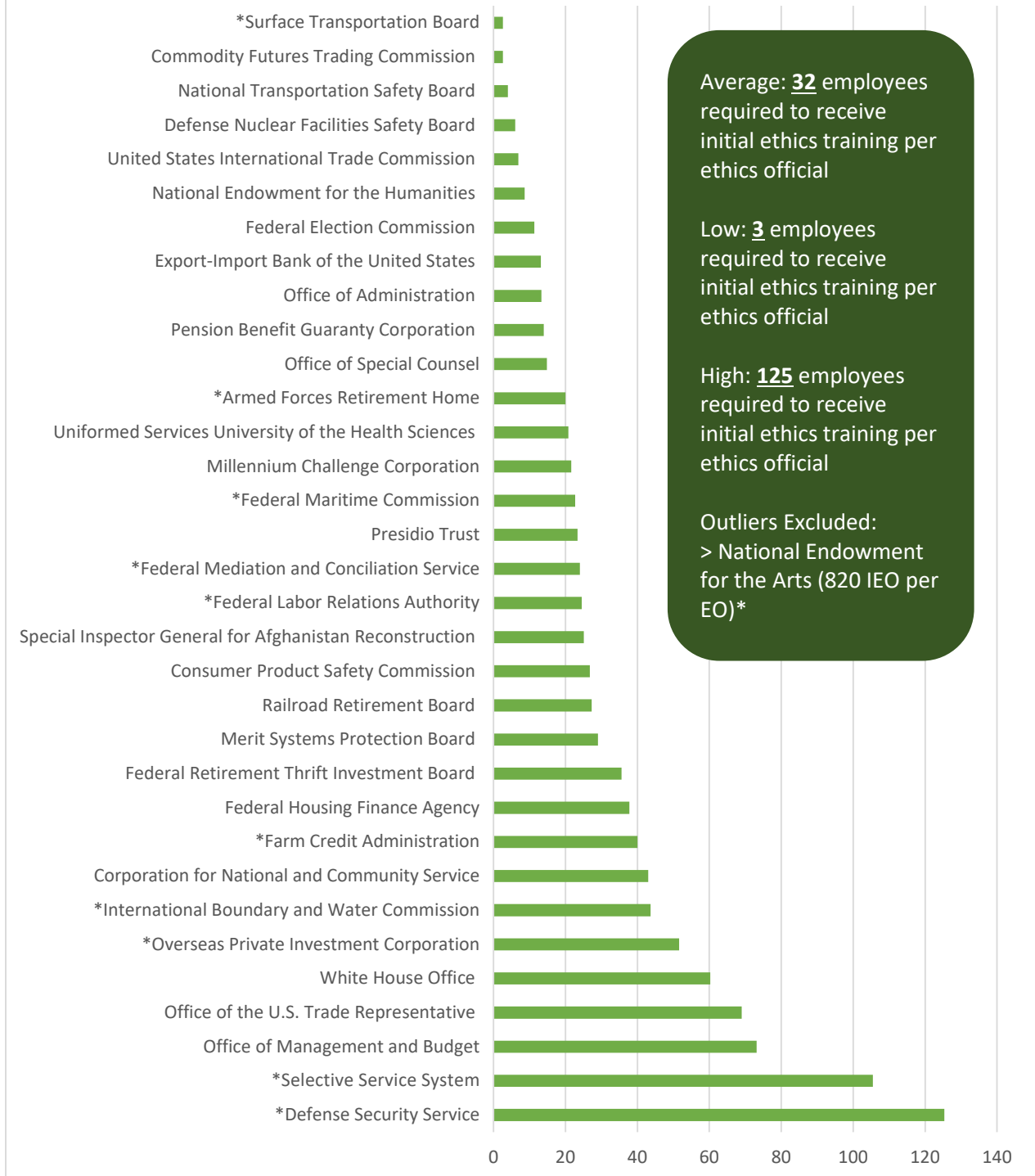
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of 278 reports per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agencies with 100 to 999 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of 450 reports per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agencies with 100 to 999 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



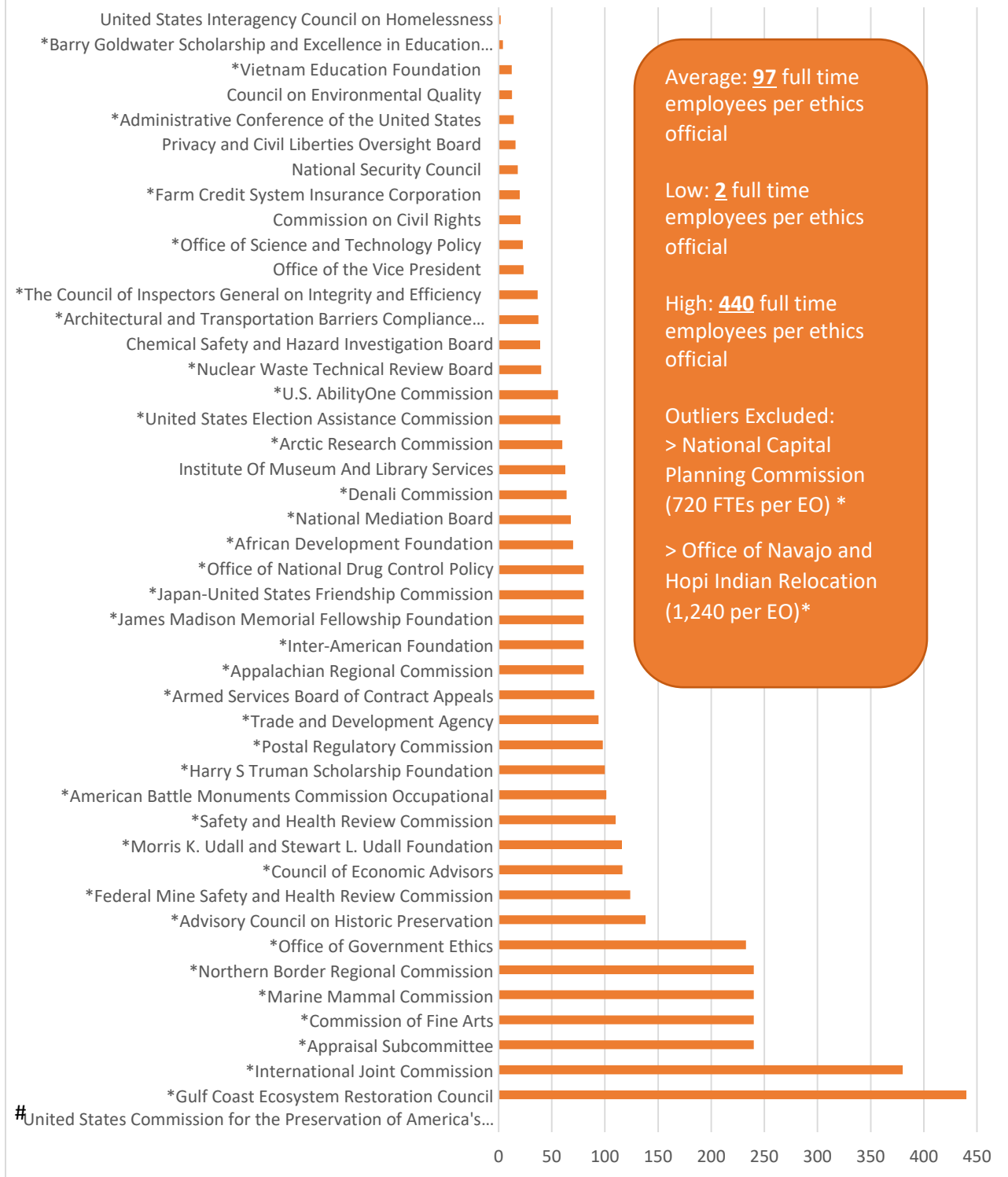
* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive initial ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agencies with 100 to 999 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive annual ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

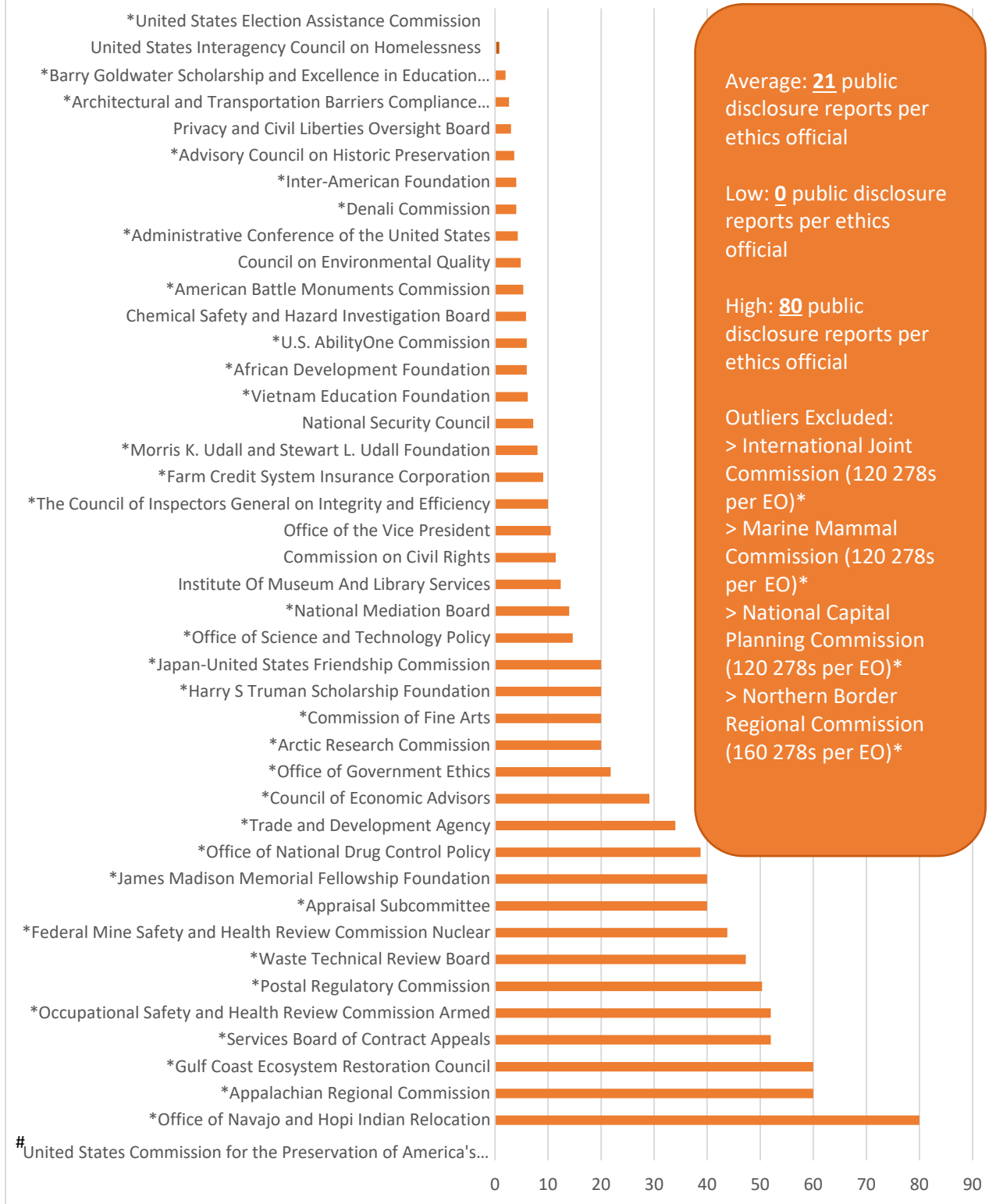
Agencies with Less Than 100 Full Time Employees: Ratio of Full Time Employees per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of full time employees per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official

Agency reported zero ethics officials in 2017.

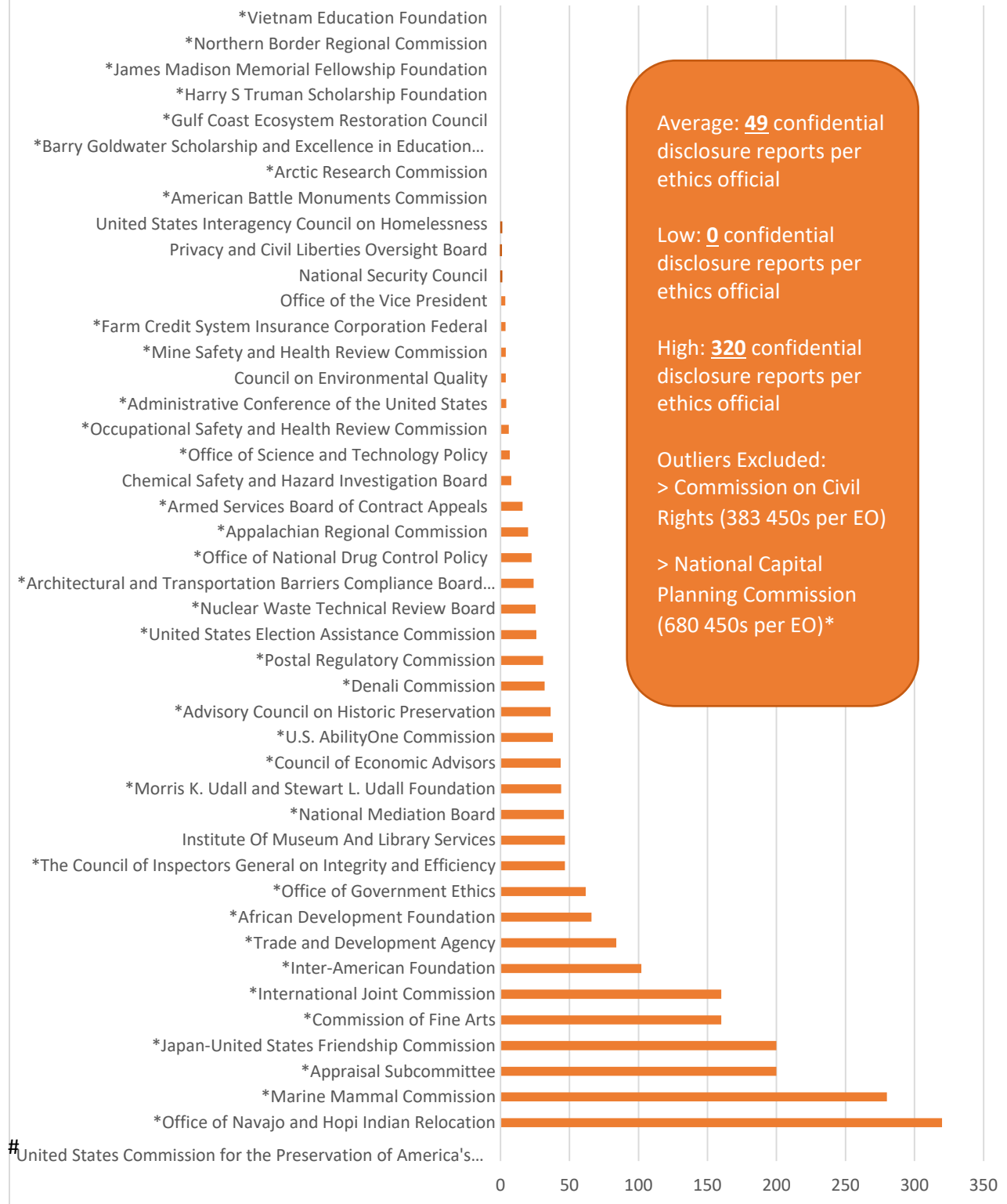
Agencies with Less Than 100 Full Time Employees: Ratio of Required Public Financial (278) Reports per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of 278s per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agency reported zero ethics officials in 2017.

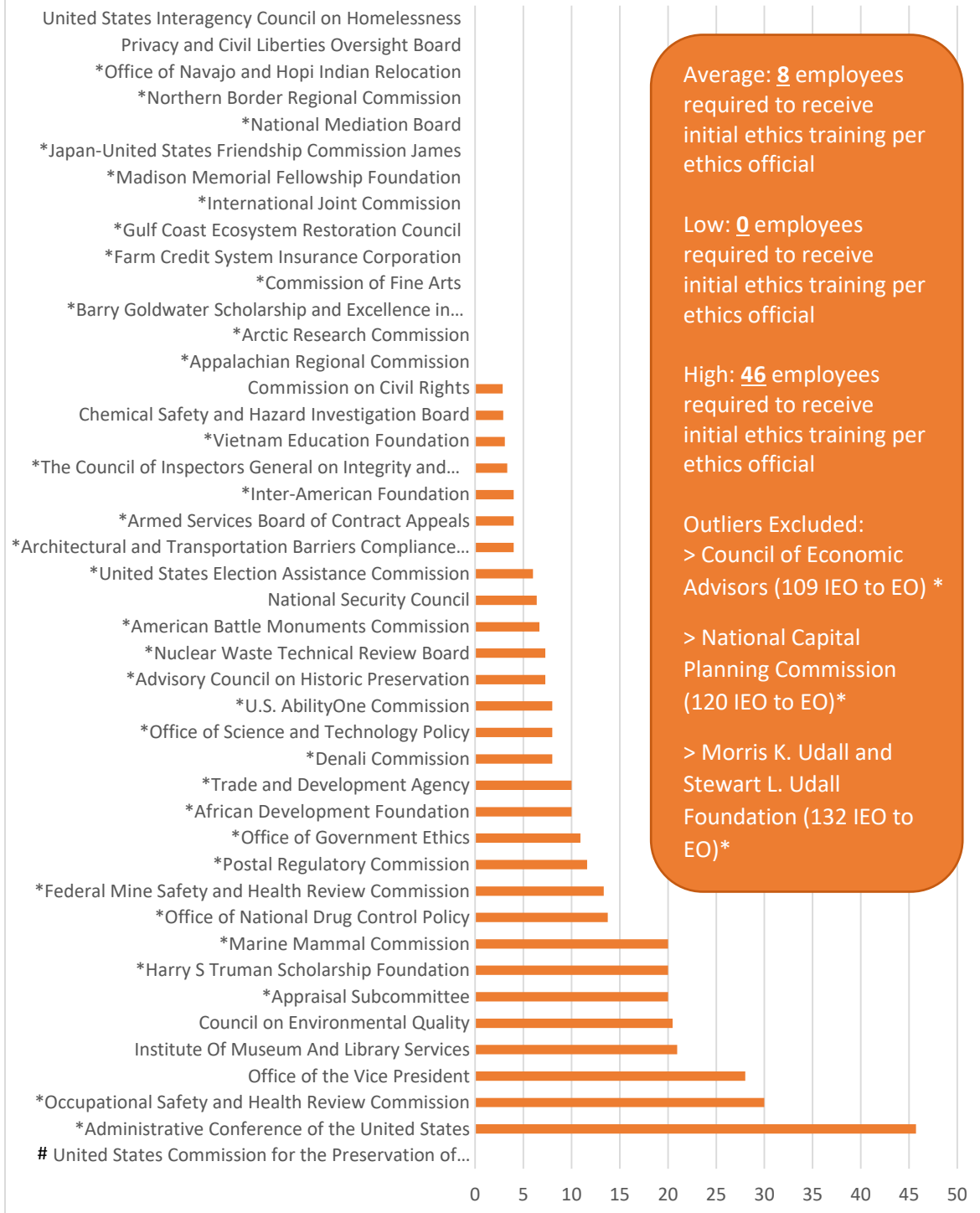
Agencies with Less Than 100 Full Time Employees: Ratio of Required Confidential Disclosure (450) Reports per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of 450s per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agency reported zero ethics officials in 2017.

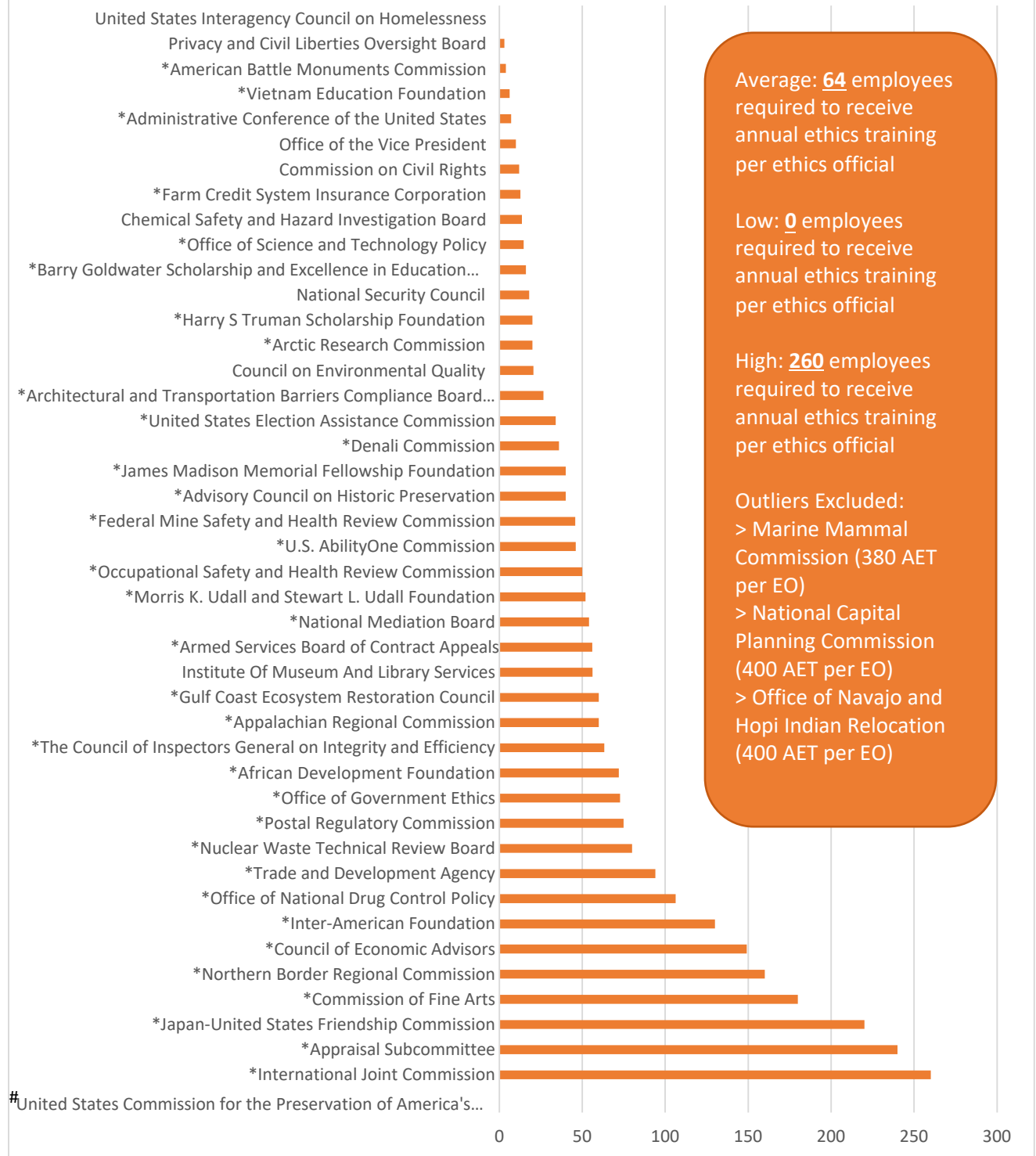
Agencies with Less Than 100 Full Time Employees: Ratio of Employees Required to Receive Initial Ethics Training per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive initial ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agency reported zero ethics officials in 2017.

Agencies with Less Than 100 Full Time Employees: Ratio of Employees Required to Receive Annual Ethics Training per Ethics Official



* Agency has less than one full time equivalent (FTE) ethics official. Accordingly, the ratio does not reflect the *actual* number of employees required to receive annual ethics training per FTE ethics official, but rather the *proportional* amount, were the agency to have one FTE ethics official.

Agency reported zero ethics officials in 2017.

Ethics Official Full Time Equivalent for All Agencies

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Administrative Conference of the United States	0.7000	0 to 99
Advisory Council on Historic Preservation	0.2750	0 to 99
African Development Foundation	0.5000	0 to 99
American Battle Monuments Commission	0.7500	0 to 99
Appalachian Regional Commission	0.0500	0 to 99
Appraisal Subcommittee	0.0500	0 to 99
Architectural and Transportation Barriers Compliance Board (United States Access Board)	0.7500	0 to 99
Arctic Research Commission	0.0500	0 to 99
Armed Forces Retirement Home	0.5000	100 to 999
Armed Services Board of Contract Appeals	0.5000	0 to 99
Barry Goldwater Scholarship and Excellence in Education Foundation	0.5000	0 to 99
Broadcasting Board of Governors	2.2500	1,000 to 9,999
Central Intelligence Agency	16.7500	classified
Chemical Safety and Hazard Investigation Board	1.0250	0 to 99
Commission of Fine Arts	0.0500	0 to 99
Commission on Civil Rights	1.7500	0 to 99
Commodity Futures Trading Commission	5.7500	100 to 999
Consumer Financial Protection Bureau	4.8750	1,000 to 9,999
Consumer Product Safety Commission	3.2500	100 to 999
Corporation for National and Community Service	2.0000	100 to 999
Council of Economic Advisors	0.2750	0 to 99
Council on Environmental Quality	1.0250	0 to 99
Court Services and Offender Supervision Agency for the District of Columbia	1.1500	1,000 to 9,999
Defense Commissary Agency	1.5000	10,000 and above
Defense Contract Audit Agency	3.5000	1,000 to 9,999
Defense Finance and Accounting Service	1.7500	10,000 and above
Defense Information Systems Agency	7.0250	1,000 to 9,999
Defense Intelligence Agency	11.0000	10,000 and above
Defense Logistics Agency	16.2500	10,000 and above
Defense Nuclear Facilities Safety Board	1.5000	100 to 999
Defense Security Service	0.7500	100 to 999
Defense Threat Reduction Agency	2.7500	1,000 to 9,999
Denali Commission	0.2500	0 to 99

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Department of Agriculture	21.0000	10,000 and above
Department of Commerce	20.0000	10,000 and above
Department of Defense - Department of the Air Force	417.1250	10,000 and above
Department of Defense - Department of the Army	412.2000	10,000 and above
Department of Defense - Department of the Navy	240.9750	10,000 and above
Department of Defense - Office of the Secretary of Defense	108.8500	10,000 and above
Department of Education	9.0000	1,000 to 9,999
Department of Energy	25.8250	10,000 and above
Department of Health and Human Services	296.3000	10,000 and above
Department of Homeland Security	101.4750	10,000 and above
Department of Housing and Urban Development	21.3000	1,000 to 9,999
Department of Justice	116.8750	10,000 and above
Department of Labor	13.1250	10,000 and above
Department of State	13.5000	10,000 and above
Department of the Interior	41.7250	10,000 and above
Department of Transportation	27.9250	10,000 and above
Department of Treasury	66.4750	10,000 and above
Department of Veterans Affairs	17.5000	10,000 and above
Environmental Protection Agency	38.4250	10,000 and above
Equal Employment Opportunity Commission	2.8500	1,000 to 9,999
Export-Import Bank of the United States	2.5000	100 to 999
Farm Credit Administration	0.5500	100 to 999
Farm Credit System Insurance Corporation	0.5500	0 to 99
Federal Communications Commission	8.0000	1,000 to 9,999
Federal Deposit Insurance Corporation	58.2500	1,000 to 9,999
Federal Election Commission	1.5000	100 to 999
Federal Energy Regulatory Commission	7.2500	1,000 to 9,999
Federal Housing Finance Agency	2.2750	100 to 999
Federal Labor Relations Authority	0.7750	100 to 999
Federal Maritime Commission	0.7500	100 to 999
Federal Mediation and Conciliation Service	0.7500	100 to 999
Federal Mine Safety and Health Review Commission	0.5250	0 to 99
Federal Reserve System	2.7500	1,000 to 9,999
Federal Retirement Thrift Investment Board	1.3500	100 to 999
Federal Trade Commission	4.5000	1,000 to 9,999
General Services Administration	24.9000	10,000 and above
Gulf Coast Ecosystem Restoration Council	0.0500	0 to 99

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Harry S Truman Scholarship Foundation	0.0500	0 to 99
Institute Of Museum And Library Services	1.0500	0 to 99
Inter-American Foundation	0.5000	0 to 99
International Boundary and Water Commission	0.2750	100 to 999
International Joint Commission	0.0500	0 to 99
James Madison Memorial Fellowship Foundation	0.0250	0 to 99
Japan-United States Friendship Commission	0.0500	0 to 99
Marine Mammal Commission	0.0500	0 to 99
Merit Systems Protection Board	1.0000	100 to 999
Millennium Challenge Corporation	2.5000	100 to 999
Morris K. Udall and Stewart L. Udall Foundation	0.2500	0 to 99
National Aeronautics and Space Administration	43.8250	10,000 and above
National Archives and Records Administration	1.3250	1,000 to 9,999
National Capital Planning Commission	0.0500	0 to 99
National Credit Union Administration	2.0500	1,000 to 9,999
National Endowment for the Arts	0.7500	100 to 999
National Endowment for the Humanities	1.5000	100 to 999
National Geospatial Intelligence Agency	4.0250	classified
National Labor Relations Board	3.7500	1,000 to 9,999
National Mediation Board	0.5000	0 to 99
National Science Foundation	15.2500	1,000 to 9,999
National Security Agency	6.0000	10,000 and above
National Security Council	2.5000	0 to 99
National Transportation Safety Board	2.5000	100 to 999
Northern Border Regional Commission	0.0125	0 to 99
Nuclear Regulatory Commission	5.5250	1,000 to 9,999
Nuclear Waste Technical Review Board	0.2750	0 to 99
Occupational Safety and Health Review Commission	0.5000	0 to 99
Office of Administration	3.0000	100 to 999
Office of Government Ethics	0.2750	0 to 99
Office of Management and Budget	1.7500	100 to 999
Office of National Drug Control Policy	0.8000	0 to 99
Office of Navajo and Hopi Indian Relocation	0.0250	0 to 99
Office of Personnel Management	1.8750	1,000 to 9,999
Office of Science and Technology Policy	0.7500	0 to 99
Office of Special Counsel	1.7500	100 to 999
Office of the Director of National Intelligence	3.2500	classified

Agency	Ethics Official Full Time Equivalent	Number of Full Time Employees
Office of the Secretary of Defense Office of the Inspector General	2.8500	1,000 to 9,999
Office of the U.S. Trade Representative	1.0000	100 to 999
Office of the Vice President	2.0000	0 to 99
Overseas Private Investment Corporation	0.7750	100 to 999
Peace Corps	2.0250	1,000 to 9,999
Pension Benefit Guaranty Corporation	3.5000	100 to 999
Postal Regulatory Commission	0.7750	0 to 99
Presidio Trust	1.5000	100 to 999
Privacy and Civil Liberties Oversight Board	1.0000	0 to 99
Railroad Retirement Board	1.1000	100 to 999
Securities and Exchange Commission	19.0000	1,000 to 9,999
Selective Service System	0.2750	100 to 999
Small Business Administration	19.0000	1,000 to 9,999
Social Security Administration	16.0000	10,000 and above
Special Inspector General for Afghanistan Reconstruction	1.2750	100 to 999
Surface Transportation Board	0.7750	100 to 999
Tennessee Valley Authority	4.5000	1,000 to 9,999
The Council of Inspectors General on Integrity and Efficiency	0.3000	0 to 99
Trade and Development Agency	0.5000	0 to 99
U.S. AbilityOne Commission	0.5000	0 to 99
Uniformed Services University of the Health Sciences	5.0000	100 to 999
United States Agency for International Development	30.7500	1,000 to 9,999
United States Commission for the Preservation of America's Heritage Abroad	0.0000	0 to 99
United States Election Assistance Commission	0.5000	0 to 99
United States Interagency Council on Homelessness	9.0000	0 to 99
United States International Trade Commission	2.7500	100 to 999
United States Postal Service	8.5000	10,000 and above
Vietnam Education Foundation	0.3250	0 to 99
White House Office	7.0000	100 to 999