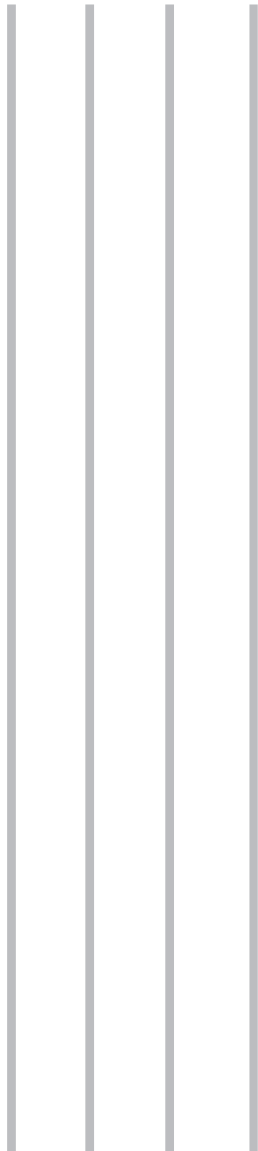


CONGRESSIONAL  
BUDGET JUSTIFICATION,

# ANNUAL

PERFORMANCE PLAN



PREPARED FOR THE  
COMMITTEES ON  
APPROPRIATIONS  
MARCH 2019

# 2020

UNITED STATES  
OFFICE OF  
GOVERNMENT  
ETHICS





## MISSION

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



## Table of Contents

<b>Section I – About OGE .....</b>	<b>1</b>
<b>Section II – Budget Request Overview .....</b>	<b>5</b>
<b>Section III – Fiscal Years 2019 and 2020 Performance Plan .....</b>	<b>9</b>
<b>Section IV – Conclusion.....</b>	<b>32</b>
<b>Appendix A – Fiscal Years 2019 and 2020 Performance Goals .....</b>	<b>33</b>



# UNITED STATES OFFICE OF GOVERNMENT ETHICS

## Section I – About OGE

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

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

### Institutional Integrity in the Executive Branch

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



Figure 1: Institutional Integrity

procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement. Potential violations of legal authorities established under this framework, including government ethics authorities, are primarily investigated by Inspectors General staff members across the executive branch. If they find evidence supporting a violation, they notify the Department of Justice, which has authority to prosecute individuals who violate ethics laws.

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

interest that stem from employees’ financial interests; business or personal relationships; misuse of official position; official time or public resources; and the receipt of gifts.

Taken together, the systems in place to identify and resolve conflicts of interest establish a foundation on which to build and sustain an ethical culture in the executive branch.

### OGE and Executive Branch Agencies

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



Figure 2: OGE and the Executive Branch

The agency head is also responsible for selecting a Designated Agency Ethics Official (DAEO), the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE. Usually, the support of additional professional ethics staff is necessary to effectively carry out ethics program responsibilities. Each agency’s employees, supervisors, human resource officials, and Inspectors General also play a significant role in maintaining the integrity of government programs and operations.

### How OGE Provides Leadership and Oversight

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

- promulgates, maintains, and advises on enforceable standards of ethical conduct for more than 2.7 million employees in over 130 executive branch agencies, including the White House;
- offers education and training to the more than 5,000 ethics officials executive branch-wide;
- oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers;
- operates and maintains *Integrity*, a public financial disclosure management application required by the Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge (STOCK) Act of 2012;



- monitors executive branch agency ethics programs and senior leaders compliance with applicable ethics laws and regulations;
- prepares for Presidential transitions and provides assistance to the President and Senate in the Presidential appointments process; and
- conducts outreach to the general public, the private sector, and non-governmental organizations; and makes ethics documents publicly available.



**Figure 3: OGE Organizational Chart**

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

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

## Long-Term Strategic Goals



**Figure 4: Strategic Goals and Objectives Framework**

The public can have greater confidence in the integrity of executive branch programs and operations when government decisions are made free from conflicts of interest. OGE’s four strategic goals for fiscal years 2018 through 2022 – uniformity,

accountability, continuity, and engagement – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. OGE’s budget priorities for fiscal year 2020 support achievement of these strategic goals.

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

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

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

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

Starting on page 9, this document describes the specific work OGE will undertake in fiscal years 2019 and 2020 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward achievement of its strategic objectives.

## Section II – Budget Request Overview

### Appropriations Language

OGE proposes the following appropriations language: “For necessary expenses to carry out functions of the Office of Government Ethics 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, 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, \$17,430,000.”

### Budget Request Overview Narrative

OGE’s newly confirmed Director publicly committed during his confirmation process to ensuring that OGE has adequate resources to effectuate its critical mission – a mission that is vital to the success of every executive branch agency and the public’s confidence in government decision-making. While OGE continues to achieve substantial savings in administrative costs through the use of numerous shared services, space consolidation, and more efficient operations, additional staff resources are essential for OGE to carry out its statutory mission. Therefore, OGE is submitting a request of \$17,430,000 to fund its indispensable work in fiscal year 2020.

The requested funding level of \$17,430,000 for fiscal year 2020 is required for OGE to effectively serve as the government’s executive branch ethics expert. OGE needs its full request to support the President and Senate in the presidential nominations process; oversee a financial disclosure system for more than 26,000 public and 380,000 confidential financial disclosure report filers; hold agency ethics programs and senior officials accountable for complying with applicable ethics laws and rules; provide expert advice and training to more than 5,000 ethics officials; ensure necessary transparency; and engage the public in holding government accountable. OGE’s past inability to fund critical vacancies and fully invest in its electronic financial disclosure filing system has impeded OGE’s ability to fully carry out its important work. OGE’s budget request enables OGE to make critical investments in the human and systems resources needed to strengthen both the agency and the overall executive branch ethics program.

*OGE requires additional human resources to carry out the agency’s mission-critical work*

OGE needs additional human resources throughout the agency to support the agency’s vital and unique role in: supporting the President and Senate in the Presidential appointments process; conducting ethics program oversight; providing critical support and expertise to support uniformity in the ethics program across the executive branch; and ensuring transparency and public engagement. To meet these critical needs, OGE is requesting funding for additional staffing resources as described more fully below.

To enhance its oversight and accountability responsibilities, OGE is requesting funding of \$146,000 to fill two ethics compliance positions. OGE conducts oversight of agency ethics programs through program reviews, and ensures accountability of senior agency leaders by reviewing their financial information and ethics agreements to identify, resolve, and monitor compliance with conflict of interest requirements and commitments. Increased staff resources for this program would enable OGE to conduct more frequent ethics reviews, thereby holding agencies accountable for having compliant ethics programs. Consistent oversight is vital to preventing conflicts of interest among front-line federal employees. Further, these additional staff resources would bolster OGE's efforts to ensure that senior government leaders timely comply with their ethics commitments, both as individuals and as heads of the ethics programs at their respective agencies.

To ensure that OGE retains an agile and knowledgeable staff for conducting complex financial disclosure reviews, OGE is requesting funding for an additional dedicated financial disclosure reviewer at \$88,000. OGE's financial disclosure staff are the foremost experts on executive branch nominee financial disclosure review – a process necessary to ensure that senior government leaders are free from financial conflicts of interest and understand their obligations both as individuals and as leaders in their organizations' ethics programs. Based on the continuing complexity and volume of financial disclosure work over the past two fiscal years, OGE has determined that an additional dedicated staff member is necessary to maintain an effective financial disclosure review program.

To provide critical support and expertise to support uniformity in the ethics program across the executive branch, OGE is requesting \$176,000 in fiscal year 2020 to fund critical vacancies in both its training and desk officer programs. OGE is responsible for providing expert advice and training to more than 5,000 ethics officials in more than 130 agencies across the executive branch. OGE's education program is essential to OGE's prevention mission. OGE is responsible for providing high quality ethics training and tools to both new and experienced ethics officials who, in turn, are responsible for training the more than 2.7 million federal employees in the executive branch. At the requested funding level, OGE would fill a training instructor position to fully staff OGE's education program, which has been under-resourced for several years. This investment would not only improve uniformity and strengthen the overall ethics program, it would also exponentially increase the resources available for ethics officials and other government officials throughout the executive branch. Similarly, OGE's desk officer program provides a unique service to support the executive branch ethics community, including on-demand, expert assistance in responding to questions and emerging ethics issues. The program supports uniformity of advice across the executive branch and provides support to ethics officials who, in turn, are responsible for providing guidance to executive branch employees at all levels. Based on increased and continuing public attention to ethics issues government wide, OGE must remain responsive to ethics officials who need guidance on the interpretation and application of the ethics laws and regulations.

Finally, to ensure transparency and support public engagement, OGE requests \$88,000 to increase its legal staff by one attorney. With the additional staff resources, OGE seeks to improve its open government initiatives, improve response times to Freedom of

Information Act (FOIA) requests, and increase expertise in the areas of Privacy Act compliance and awareness, which are all areas of heightened public interest. OGE must maintain the staff resources necessary to ensure that its programs remain transparent and responsive.

*OGE requires additional funding to securely maintain and upgrade its critical IT resources*

In addition to the requested increase in staff resources, OGE is also requesting additional funding to make necessary upgrades to its vital IT systems, as described more fully below.

OGE operates *Integrity*, the electronic public financial disclosure filing system currently used by over 17,000 of the highest level officials in the executive branch. OGE's secure, web-based electronic filing system, which has been fully adopted by the Administration, includes features that improve the accuracy of filing and review and create a fully paperless process. The system and OGE's support and expertise with the system have remained in high demand since the 2016 election. Demand will be further heightened after the 2020 Presidential election, when there is expected to be substantial turnover in Presidentially-appointed, Senate confirmed positions (PAS), irrespective of the outcome of the election. Accordingly, OGE will need to invest \$473,000 to ensure that the system continues operating securely and efficiently.

Transparency and public engagement is an important aspect of OGE's role as the leader of the executive branch ethics program. One of the main ways that OGE engages the public and provides transparency into the program is via its website. With continued heightened public interest in OGE and its work, it is imperative that OGE increase the functionality, capacity, and access to ethics information via its website. To that end, OGE requests \$20,000 toward a redesign of its website to improve public access to ethics documents, ethics officials' access to key resources needed to perform their jobs, and further ensure IT security.

### *Conclusion*

OGE requires \$17,430,000 to fund its indispensable work in fiscal year 2020. OGE's mission work of preventing conflicts of interest is vital to the success of every agency's mission and to the American public's confidence in its government. OGE respectfully requests the necessary increase in professional staff and systems resources in order to continue to advance a strong, uniform executive branch ethics program; hold the executive branch accountable for carrying out an effective ethics program; contribute to the continuity of senior leadership in the executive branch; and engage the public in overseeing government integrity. Approval of OGE's request signals visible support for the executive branch ethics program.

## 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)

		2018	2019	2020
	<u>Object Class</u>	<u>Enacted</u>	<u>CRA Level</u>	<u>Request</u>
11.1	Salaries	\$8,782	\$8,946	\$9,283
12.1	Benefits	\$2,626	\$2,766	\$2,861
21.0	Travel	\$10	\$3	\$5
22.0	Transportation (Freight)	\$2	\$2	\$1
23.1	Rental Payments	\$1,337	\$1,401	\$1,417
23.3	Communications and Utilities	\$114	\$122	\$120
24.0	Printing and Reproduction	\$66	\$62	\$87
25.2	Other Services	\$2,674	\$3,019	\$3,524
26.0	Supplies and Materials	\$93	\$84	\$87
31.0	Equipment	\$735 <sup>1</sup>	\$34	\$45
99.00	Subtotal	\$16,439	\$16,439	\$17,430
99.00	Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0	Totals	\$17,164	\$17,164	\$18,155
	FTEs	70	71	77

---

<sup>1</sup> Reflects four year cyclical replacement of IT infrastructure.

## **Section III – Fiscal Years 2019 and 2020 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. OGE then assesses its success in achieving these goals and objectives by measuring progress on its performance goals.

Organized by strategic goal and objective, this section describes OGE’s planned work for fiscal years 2019 and 2020. Information on how OGE will measure progress toward achieving its strategic goals can be found in Appendix A.

# STRATEGIC GOAL



## ADVANCE A STRONG, UNIFORM EXECUTIVE BRANCH ETHICS PROGRAM

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

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

- (1.1) Provide expert guidance and support to stakeholders;*
- (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program; and*
- (1.3) Continuously refine ethics policy and issue interpretive guidance.*





## Strategic Objective 1.1: Provide expert guidance and support to stakeholders

OGE provides expert guidance and support to stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. In fiscal years 2019 and 2020, 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 share 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.

### *Assist and support agency ethics officials*

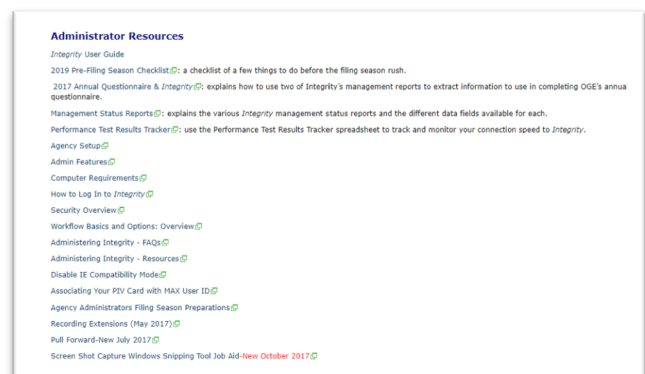
OGE will continue to provide necessary support to agency ethics officials so they can provide uniform and effective ethics guidance to nearly 3 million federal employees in the executive branch who serve the American people. This support includes timely, expert advice on applying the ethics laws and regulations, as well as other information ethics practitioners need to do their jobs effectively. On average, OGE Desk Officers respond to 1,800 calls for assistance per year, often with assistance from OGE's ethics policy lawyers (see page 15). Desk Officers also meet personally with agency ethics officials in order to increase their knowledge and build professional relationships.

### *Ensure ethics officials have up-to-date information*

OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date and consistent ethics information. OGE will post legal and program advisories and other guidance in a searchable format on its website, and provide notices of new guidance via the OGE listserv, which reaches approximately 3,500 ethics officials. OGE also will continue to host regularly scheduled quarterly meetings with senior agency ethics officials to ensure they have up-to-date information. In fiscal year 2019, OGE will begin a redesign of its website with a focus on improving usability of the site as a research tool (see page 32 for further discussion).

### *Integrity Support*

OGE will continue to support agencies' use of *Integrity*, OGE's executive branchwide electronic public financial disclosure filing system. To support the more than 25,000 users (filers, administrators, and reviewers) OGE will continue to provide centralized help desk services and user resources, such as written and online tools, to address user questions to ensure consistency and uniformity.



Additional information about *Integrity* can be found on page 31.

*Respond to requests for technical assistance*

OGE will also continue to provide substantive advice and analysis in response to external requests for government ethics expertise. OGE provides such assistance to a variety of external stakeholders, such as Congress, the Administrative Conference of the United States, professional associations, non-governmental organizations, academia, state and local governments, and employee groups. OGE's assistance builds a better, uniform understanding of the executive branch ethics program. In fiscal year 2018, OGE responded to over 200 requests for such assistance.

*Support the vital work of the ethics enforcement communities*

OGE will continue to support the vital work of the ethics enforcement communities, including Inspectors General and employee relations personnel, who are responsible for holding agency employees accountable for abiding by the ethics laws and rules. To support them, OGE will continue to respond to extensive requests for technical assistance, as well as participate actively as a member of the Council of Inspectors General on Integrity and Efficiency (CIGIE). Additional information on the training OGE provides to the enforcement communities is on page 14.

*Support United States foreign policy initiatives*

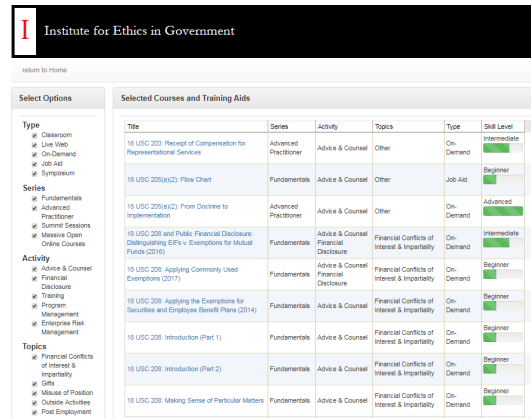
Finally, at the request of U.S. foreign policy agencies, OGE will continue to provide its expertise through participation in international programs designed to support and enhance U.S. foreign policy initiatives in the areas of anti-corruption and good governance. OGE also will continue to meet with State Department sponsored foreign delegations to provide information about U.S. implementation of ethics and good governance programs.

**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 officials who are integral to the executive branch ethics program. In addition to agency ethics officials who are tasked with ethics responsibilities, other officials such as agency leaders, Inspectors General, and human resource professionals each play a significant role in carrying out an effective program. In fiscal years 2019 and 2020, OGE will continue to provide professional development opportunities, encourage and support ethical leadership, and provide training to support an ethical workforce. Key highlights of OGE's planned work are described below.

## Professional development of ethics officials

In order to ensure consistency and uniformity in agency ethics programs, OGE provides intensive training for new DAEOs as well as a set of comprehensive education resources for ethics officials at all experience levels. OGE also supports the development of ethics officials by maintaining and growing an “Education Library” on its website. The library includes a variety of education resources designed for use by ethics officials, including archived recordings of web-based training presentations, slide decks, and job aids, which can be searched and sorted by topic, type, and complexity. Ethics officials are encouraged to use these resources to create self-paced curricula for their professional development.



The screenshot shows the 'Institute for Ethics in Government' website. It features a search results page for 'Selected Courses and Training Aids'. The page includes a sidebar with 'Select Options' for filtering by Type, Series, Activity, and Topics. The main content is a table with columns for Title, Series, Activity, Topics, Type, and Skill Level. The table lists various courses such as '18 USC 201: Receipt of Compensation for Representational Services' and '18 USC 205(a)(2): Flow Chart', with their respective series, activities, topics, and skill levels.

Title	Series	Activity	Topics	Type	Skill Level
18 USC 201: Receipt of Compensation for Representational Services	Advanced Practitioner	Advice & Counsel	Other	On-Demand	Intermediate
18 USC 205(a)(2): Flow Chart	Fundamentals	Advice & Counsel	Other	Job Aid	Advanced
18 USC 205(a)(2): From Doctrine to Implementation	Advanced Practitioner	Advice & Counsel	Other	On-Demand	Advanced
18 USC 208 and Public Financial Disclosure: Distinguishing EP's v. Exemptions for Mutual Funds (2016)	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Intermediate
18 USC 208: Applying Commonly Used Exemptions (2017)	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Beginner
18 USC 208: Applying the Exemptions for Securities and Employee Benefit Plans (2014)	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Beginner
18 USC 208: Introduction (Part 1)	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Beginner
18 USC 208: Introduction (Part 2)	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Beginner
18 USC 208: Making Sense of Particular Matters	Fundamentals	Advice & Counsel	Financial Disclosure	On-Demand	Beginner

OGE will continue to conduct orientations for new DAEOs, including targeted, intensive training for ethics officials in critical roles, and will hold workshops and similar events to create opportunities for ethics officials to share experiences and lessons learned.

## Encourage and support ethical leadership throughout the executive branch

Ethical culture begins with demonstrated ethical leadership throughout an organization. To advance a consistently strong program, OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will engage with senior leadership directly and indirectly through meetings, external communications, involvement in nominee financial disclosure reports and ethics agreements, as well as through publications, and educational offerings. For example, OGE’s Director will meet in-person with agency heads to discuss their role in setting an ethical culture at their agencies. OGE will also 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.



Finally, through ongoing research and partnerships with others, OGE will discover and share tools and tactics for leaders to use to effectively communicate the ethical expectations for their organizations.

## Hold the National Government Ethics Summit

In fiscal year 2020, OGE expects to hold its third National Government Ethics Summit (Summit). By leveraging federal space and expertise of ethics practitioners from within and outside government, OGE will continue its approach of providing an intensive, multi-day training

event at virtually no cost. OGE designed the Summit concept to advance a strong, uniform program by providing attendees with opportunities to deepen their knowledge of the ethics laws and rules, share lessons learned through extensive practical experience, listen to viewpoints from experts outside government, and build connections with ethics officials who can assist in resolving even the most complex ethics issues. Coming at the end of a full presidential transition, the Summit will bring together hundreds of executive branch ethics officials and external stakeholders, including officials from the legislative and judicial branches of the federal government, Inspectors General staff, members of the press, and advocates from good government groups to collaborate and share lessons learned and prepare for the next transition.



*Providing resources to support an ethical federal workforce*

OGE recognizes that maintaining consistent and 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 will continue to maintain a collection of training resources for new and current federal employees, share model practices for communicating about ethics within organizations, and leverage opportunities to directly discuss ethical standards with groups of federal employees.

*Provide training to enforcement and human capital communities*

In support of OGE's goal of a strong, uniform ethics program, OGE will continue to train and collaborate with members of the enforcement communities by providing training as part of the Inspector General Criminal Investigator Academy's Public Corruption Investigations Training Program. OGE also will continue to conduct outreach with the human capital community. OGE plans to invite members from these communities to participate in the next National Government Ethics Summit.

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

Executive branch officials rely on OGE to provide clear policies and guidance on the ethics laws and regulations. In fiscal years 2019 and 2020, OGE will continue to review, refine, and issue interpretive guidance on the ethics rules and regulations to ensure their continued relevance, consistency, and effectiveness. Key highlights of OGE's planned work are described below.

#### *Provide timely legal and program guidance*

In fiscal years 2019 and 2020, OGE plans to issue legal and program advisories, as needed, to provide interpretive guidance about the ethics laws and regulations. For example, OGE will issue further interpretive guidance concerning conflicts of interest analyses and the use of the gift exceptions. In fiscal year 2020, OGE plans to issue advisories and other interpretive guidance concerning commonly occurring issues surrounding a Presidential transition, such as post-government employment guidance.

In developing these advisories, OGE will continue to draw upon the expertise of agency ethics officials by consulting with key members of the ethics community. OGE's guidance enables ethics officials to provide more uniform implementation of the ethics program executive branchwide and provide consistent guidance to their employees, thereby reducing agency risk. OGE will use the OGE listserv, website, desk officers, and training broadcasts to ensure its guidance is disseminated widely.

#### *Publish final and proposed rules*

In fiscal year 2018, OGE finalized amendments to its regulations governing executive branch financial disclosure systems, the certification and use of qualified trusts, and the issuance of certificates of divestiture. The regulations become effective in fiscal year 2019. OGE will update the public and confidential financial disclosure forms, as well as relevant review guides to implement and reflect the updated regulations. OGE will also offer training to the executive branch ethics community to explain the updates.

In fiscal year 2019, OGE expects to continue its work to modernize the *Standards of Ethical Conduct for Employees of the Executive Branch* (the Standards) by publishing a proposed regulation. In addition, OGE also expects to begin the process of modifying the Standards by drafting an amendment to 5 CFR 2635 subpart B (Gifts from Outside Sources) addressing the conditions under which an executive branch employee may accept a gift of legal expenses. OGE expects to gather stakeholder input during fiscal year 2019 and publish a proposed regulation during fiscal year 2020.

In fiscal year 2019, OGE will continue its in-depth review of the existing regulations governing financial disclosure conflict of interest exemptions. In fiscal year 2019 and again in fiscal year 2020, OGE plans to publish a final rule implementing inflationary adjustments

to each of the five civil monetary penalties provided for in the Ethics in Government Act. Finally, in fiscal years 2019 and 2020, OGE will continue to consult with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs.

# STRATEGIC GOAL



## **HOLD THE EXECUTIVE BRANCH ACCOUNTABLE FOR CARRYING OUT AN EFFECTIVE ETHICS PROGRAM**

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

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

- (2.1) Monitor agency compliance with executive branch ethics program requirements; and*
- (2.2) Monitor senior leaders' compliance with individual ethics commitments.*



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

OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at each agency as well as to identify executive branchwide trends. In fiscal years 2019 and 2020, 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. Key highlights of OGE's planned work are described below.

### *Conduct program reviews*

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch, in fiscal years 2019 and 2020 OGE will continue to conduct program reviews through a combination of plenary reviews and inspections. The purpose of a review is to identify and report on the strengths and weaknesses of an ethics program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies and (2) ethics-related systems, processes, and procedures for administering the program.

OGE's review examines all elements of the 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 will conduct appropriate follow-up reviews to evaluate agencies' progress in implementing any recommendations made in OGE's program review reports.

### *Collect and publish required ethics program data*

Agencies are statutorily required to submit annual reports to OGE. This required program data is collected through the Annual Agency Ethics Program Questionnaire (Annual Questionnaire). With regard to this data set, OGE will continue to ensure 100 percent compliance and review individual agency responses as well as the compiled data. OGE will continue to build capacity to analyze trend data to identify areas of concern at individual agencies or across the executive branch. In fiscal years 2019 and 2020, OGE will also continue its practice of publishing a summary report and the full set of raw data on its website. Lastly, OGE will continue to encourage agencies to use the Annual Questionnaire as a self-assessment tool and to benchmark themselves against similarly situated agencies.

OGE will also continue to ensure compliance with the requirement for agencies to submit biannual reports (1353 Travel Reports) that document payments of travel accepted from non-Federal sources. As required, OGE makes these reports available on its website. Beyond the Annual Questionnaire and 1353 Travel Reports, OGE will, as necessary, continue to request ethics program data from agencies to address current issues that require oversight.



### *Collect information on potential ethics violations by executive branch employees*

Agencies are required to concurrently notify OGE's Director when any matter involving a potential violation by an executive branch employee of 18 U.S.C. §§ 203, 205, 207, 208, or 209 is referred to the Department of Justice. Agencies use OGE Form 202 (Notification of Conflict of Interest Referral) to submit these notifications and information regarding the disposition of the matter. OGE tracks and follows up on conflicts of interest referrals to the Department of Justice to ensure that agencies are considering disciplinary or other corrective action in the event of declinations of prosecution. OGE will also publish its annual survey of prosecutions involving the conflict of interest criminal statutes (18 U.S.C. §§ 202-209) and other related statutes for the period January 1, 2018 through December 31, 2018.

### *Develop a Program Management Guide*

In fiscal year 2019, OGE will develop a Program Management Guide for ethics officials. This document will serve as a comprehensive guide to the many elements of administering an ethics program, such as the authorities for the program, important compliance deadlines, key ethics rules applicable to employees, remedies for potential and actual conflicts of interest, the financial disclosure program, training requirements, advice and counsel responsibilities, program reporting and compliance components, and records management. The Guide will include practical tips and links to key advisories, job aids, and online resources that OGE has published over time.

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

OGE monitors senior leaders' compliance with individual ethics commitments to ensure that executive branch officials conduct the government's business impartially. This includes monitoring agency leaders' compliance with their ethics agreements and providing a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's planned work are described below.

#### *Monitor compliance with commitments made by incoming agency leaders to resolve conflicts of interest*

OGE will continue its role in ensuring that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office. OGE will continue to monitor the timely compliance by PAS officials with their commitments to resolve conflicts of interest as reflected in their ethics agreements. Recently, OGE strengthened the process for reporting and monitoring compliance with ethics agreements. This has resulted in a more uniform and transparent process. OGE developed a Certification of Ethics Agreement Compliance, which requires appointees to personally attest to their ethics agreement compliance. In an effort to make more ethics

documents available to the public, OGE will continue the practice started in fiscal year 2017 of posting these certifications on its website.

*Provide expert, second-level review of periodic and annual financial disclosure reports of appointees to highest-level executive branch positions*

OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements. OGE will continue to provide timely access to these disclosures on its website as described on page 27.

*Review requests for Certificates of Divestiture*

Executive branch agencies or OGE can direct an executive branch employee to sell, or otherwise divest, an asset in order to comply with a Federal conflict of interest statute, regulation, rule, or executive order. If selling the asset will result in a capital gain, certain individuals may be eligible for a Certificate of Divestiture (CD) to offset the tax burden. OGE will continue to review requests for CDs and make them available electronically through the OGE Form 201 request process.

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

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

# STRATEGIC GOAL



## CONTRIBUTE TO THE CONTINUITY OF SENIOR LEADERSHIP IN THE EXECUTIVE BRANCH

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

To achieve its strategic goal of contributing to the continuity of senior leadership in the executive branch, OGE has developed two strategic objectives. These objectives are:

- (3.1) Prepare for a Presidential transition; and*
- (3.2) Provide assistance to the President and the Senate in the Presidential appointment process.*



### Strategic Objective 3.1: Prepare for a Presidential Transition

OGE must prepare for the possibility of new executive branch leadership after a Presidential election every four years. To prepare for a Presidential transition, OGE participates in federal transition councils, collaborates with other transition service providers, updates necessary resources, publishes legal advisories on relevant issues, and provides training on transition-related topics. OGE also works with the representatives of Presidential candidates in connection with their financial disclosure reports and supports early transition efforts of a newly elected President. Key highlights of OGE's planned work are described below.

*Participate in meetings, develop training plans, and review resources*

#### Actively Participate in Meetings

In fiscal year 2019, OGE anticipates participating in working groups focused on how to prepare and improve future transitions. In fiscal year 2020, OGE will actively participate as a member of the Transition Service Providers Council.

#### Develop and Conduct Training

OGE will develop and implement comprehensive training plans for OGE staff and ethics officials.

With respect to OGE staff, OGE plans to build internal capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition. The plan is customized based on each employee's knowledge level and is designed to build the skills of intermediate and experienced reviewers as well as to train other staff members who do not currently review nominee reports to review them during a transition. In addition to classroom training, activities include hands-on practical exercises and assignments to reinforce learning. The plan also incorporates a mentorship program to complement the formal training and to enhance and accelerate learning.

With respect to ethics officials, OGE will also develop and implement a comprehensive plan for training on nominee financial disclosure. 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 the Presidential transition. Agency ethics officials must successfully manage the surge in financial disclosure filings related to a high volume of incoming nominees as well as provide each new agency employee with an initial ethics orientation. Further, agency ethics officials must educate those officials leaving government service about the various ethics rules that apply to seeking employment and post-government employment. In fiscal year 2020, OGE will provide resources and a variety of educational opportunities to ethics officials related to financial disclosure and these other important Presidential transition-related topics.

In addition, prior to and soon after the election, OGE will provide training to Congressional staff on OGE's role in the nomination process. OGE will also offer transition

teams training in nominee financial disclosure and using *Integrity*, OGE's executive branchwide electronic public financial disclosure system.

Update key resources for financial disclosure filers and reviewers

OGE will review and update key resources as described below:

<b>Public Financial Disclosure Guide</b>	The Public Financial Disclosure Guide is an interactive tool to assist individuals who file or review public financial disclosure reports (OGE Form 278e or OGE Form 278-T).
<b>Confidential Disclosure Guide</b>	The Confidential Financial Disclosure Guide is an interactive tool to assist individuals who file or review confidential financial disclosure reports (OGE Form 450).
<b>Ethics Agreement Guide</b>	The Ethics Agreement Guide is an extensive collection of guidance and model language for agency reviewers who draft ethics agreements.
<b>Transition Guide</b>	The Transition Guide is a resource for the Presidential Transition Team to prepare for the upcoming transition so that top leadership positions can be filled quickly and free from conflicts of interest.

As part of its review and update process, OGE will seek input from the ethics community on these resources. OGE will refine and streamline internal processes based on its experience from the 2017 Presidential transition. OGE also plans to issue legal advisories and other interpretive guidance concerning common issues surrounding a Presidential transition, such as post-government employment. Lastly, in fiscal year 2019, OGE will work with Presidential campaigns on candidate financial disclosure reports and offer them ethics briefings.

**Strategic Objective 3.2: Provide assistance to the President and the Senate in the Presidential Appointment Process**

Following a Presidential election and throughout an administration, OGE continuously assists the President and the Senate in the Presidential appointment process. OGE provides an independent review of the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed (PAS) nominees and candidates for the Offices of the President and Vice President. Key highlights of OGE's planned work are described below.

*Provide expert, second-level review of financial disclosure reports of nominees to highest-level executive branch positions*

In fiscal year 2019, OGE will continue to work with the White House and executive branch agencies to make sure that the President's nominees have complied with the extensive financial disclosure requirements under the Ethics in Government Act. OGE's review of nominee disclosures presents a critical opportunity to evaluate a nominee's financial interests for potential conflicts of interest and introduces top leaders to the importance of ethical leadership. When potential financial conflicts of interest are detected, OGE will work with agency ethics officials in drafting ethics agreements to remedy identified conflicts of interest. OGE will then monitor compliance with these ethics agreements after the nominees are confirmed (see page 19). In addition, OGE will continue providing agency ethics officials with guidance and instruction to improve their review of financial disclosure reports.

OGE will continue to successfully operate *Integrity*, its executive branchwide electronic public financial disclosure system. In fiscal year 2019, OGE will focus on ensuring stable system operations and high quality support for *Integrity*, as heavy use by incoming PAS nominees continues. *Integrity* produces high quality financial disclosures by helping filers report required information more easily and accurately. See page 31 for additional information about *Integrity*.

# STRATEGIC GOAL

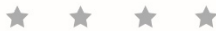
IV

## ENGAGE THE PUBLIC IN OVERSEEING GOVERNMENT INTEGRITY

OGE's prevention mission involves engaging the public to inform them about the systems in place to detect and resolve the conflicts of interest of their government leaders. This enables the public to oversee the integrity of its government.

To achieve its strategic goal of engaging the public in overseeing government integrity, OGE has developed two strategic objectives. These objectives are:

- (4.1) Inform the public about OGE and the executive branch ethics program; and*
- (4.2) Make ethics information publicly available.*



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

OGE informs the public and other key stakeholders about OGE and the executive branch ethics program to raise awareness of the systems in place to detect and resolve conflicts of interest. This enables the public to hold government officials accountable. In fiscal years 2019 and 2020, 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.

*Provide relevant, understandable information to enable citizens to hold their government accountable*

It is critical that the public have confidence in the impartiality of government decision-making. Therefore, OGE has a responsibility to communicate effectively about the ethics program to its stakeholders. OGE has a wide spectrum of external stakeholders ranging from the media and government watchdogs to its major federal partners and the public. In fiscal years 2019 and 2020, 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. For example, OGE has used Twitter to dispel misconceptions, explain how to access documents, illustrate how various ethics documents relate to each other, and outline the various roles and responsibilities of individuals within the ethics program.

When appropriate, OGE will also seek input from citizens on ways the agency can improve its communications efforts with a specific focus on the information found on its website.



*Timely respond to external requests for information and assistance*

OGE will timely respond to the expected 1,000 external requests for information and assistance received each year from the public, press, Congress, and various associations. Through such interactions, OGE aims to increase awareness and understanding of the ethics laws and regulations, and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationship and information



sharing with the media by responding to inquiries and publishing helpful information on its website.

*Collaborate with and engage a broader array of stakeholders*

Ethics in government is a shared concern across all segments of society. OGE sees value in sponsoring public forums where diverse stakeholders can openly discuss ideas and share information to help inform ethics program efforts. OGE plans to seek information from academic institutions conducting research in the areas of organizational behavior, risk management, and behavioral interventions to support OGE's ethics and education programs.

OGE will also continue 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 Counsel Forum. OGE will seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission, such as the Partnership for Public Service. Through meetings, presentations, and online forums, OGE will also continue to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. 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 through regular meetings.

**Strategic Objective 4.2: Make ethics information publicly available**

OGE makes ethics information publicly available to help the American public hold senior leaders accountable for making decisions that are based on the interests of the public rather than their own personal financial interests. Ethics information includes a wide variety of materials such as public financial disclosures, program review reports on agency ethics programs, and written policy guidance. Key highlights of OGE's planned work are described below.

*Make Ethics Documents Publicly Available and Accessible*

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2019 and 2020 OGE will continue to timely post a variety of critical ethics documents on its website. These documents include agency program review reports, policy guidance, information about each agency's ethics program, documentation of senior leaders' compliance with ethics commitments, and financial disclosure reports of high-level officials. OGE will also continue to remind agencies of their obligation to promptly make available ethics documents.

OGE will build on its efforts to inform the public about the availability and usability of this information by streamlining the process to access information and making it easier to navigate and view the data on its website. These efforts will include a review and

redesign of OGE's website to identify changes to improve the user's experience. OGE will also continue to identify new data sets that can be made publicly available on its website.

Finally, OGE will maintain a 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 interest in government ethics issues. To increase transparency and respond to this increased 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.

# MANAGEMENT OBJECTIVES



This section describes OGE’s planned work related to its management objectives and the steps OGE will take to maintain a culture of performance. Information on how OGE will measure its progress toward achieving its management goals in fiscal years 2019 and 2020 can be found in Appendix A – Fiscal Years 2019 and 2020 Performance Goals.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2019 and 2020 through several initiatives. OGE will continue to track its progress of its annual performance goals by holding mid-year strategic objective reviews and by conducting regular executive and senior staff meetings to discuss progress on agency goals and priorities as well as the status of program activities. OGE will continue to hold supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff. OGE will also continue to incorporate enterprise risk management in the agency’s performance management process.

## Management Objective 5.1: Sustain a Strong Culture of Performance Management

In fiscal years 2019 and 2020, OGE will work to sustain its strong culture of performance management. OGE maintains a culture of performance through extensive communication and policy, accountability, and performance mechanisms.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2019 and 2020 through several initiatives. OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings, conducting mid-year strategic objective reviews, holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of significant program activities, and holding supervisors accountable for ensuring ongoing communication regarding OGE goals and priorities with all staff.

OGE is committed to meeting its employees' professional development needs by providing significant education and training opportunities and support through the dedication of time and resources. 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. OGE will also continue to identify agency knowledge and skills gaps, and will use the EDP to train employees to fill those gaps. In addition, OGE will continue to provide internal and external training and development opportunities to its employees at all levels.

OGE will also continue to hold regular training sessions for new employees as well as other meetings for employees within the agency, to share information and to develop and improve their knowledge and skills. These actions, collectively, will ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

## Management Objective 5.2: Strengthen organizational compliance and fiscal stewardship

OGE will continue to strengthen its organizational compliance and fiscal stewardship by continuously evaluating its practices and systems to identify areas in need of improvement. OGE will remain a good steward of taxpayer dollars as reflected by its existing track record of strong financial management. In fiscal years 2019 and 2020, OGE will continue to pursue efficiencies, such as the economies of scale received from using shared service centers for a significant number of support services.

OGE also will maintain a robust records program. In fiscal years 2019 and 2020 OGE plans to: continue to update and seek NARA approval for OGE records schedules to bring them into compliance with NARA's revised guidance; continue to update and refine electronic file plans for individual OGE branches and divisions; cull records suitable for destruction or NARA preservation; and evaluate OGE's implementation of the OGE email preservation and CUI programs.

In fiscal years 2019 and 2020, OGE's privacy program will conduct and document cyclical reviews of the OGE Privacy Plan and supporting documents to ensure compliance with OMB guidelines; conduct annual privacy training; comply with annual FISMA privacy program reporting requirements; and engage with other small agency privacy program leaders to establish a community of practice.

In general, OGE will strive to remain compliant with the wide array of requirements applicable to federal agencies.

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

OGE will continue to prioritize its activities to continuously enhance and secure its information systems and processes. These systems and processes include OGE's maintenance of the executive branchwide electronic financial disclosure filing system, *Integrity*, as well as numerous internal applications. These efforts also include OGE's maintenance of previously redesigned and streamlined workflows for agency programs that increased the use of technology, enhanced management practices, and strengthened compliance activities.

*Successfully operate Integrity and use the system to review and analyze the financial disclosure reports submitted during the Presidential transition*

In fiscal year 2019, OGE will invest in a significant change in the architecture of *Integrity* to increase the capacity and speed of the system, as the number of users continues to increase. In fiscal year 2018, OGE sought feedback from the newly formed *Integrity* Advisory Council, composed of agency *Integrity* administrators, regarding suggested modifications to the system. In fiscal year 2020, OGE plans to develop some of their requested features and changes and will continue to regularly seek feedback from this community. OGE will strive to ensure that the system continues to run reliably for current filers and to efficiently manage the increased number and more complex filings of new PAS nominees, who are expected to use the system during the second half of the Presidential transition. OGE will also maintain its responsiveness to requests by the Administration for targeted enhancements as well as enhancements required to address evolving security requirements and to prepare for the 2020 election.

#### *OGE's Security program*

In fiscal years 2019 and 2020, 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 an accredited independent auditor; collaborate with DHS contractors to implement Phase 2 of the Continuous Diagnostics and Mitigation (CDM) Program

(Privilege Management); and develop a tool to provide online cybersecurity awareness and privacy training.

#### *Maintain Internal Applications and Streamline Data Collection*

OGE has regularly developed and/or redesigned numerous internal applications that streamlined workflows for agency programs, made data more retrievable, enhanced management practices, and strengthened compliance activities. In fiscal years 2019 and 2020, OGE will continue to devote resources toward maintaining these various applications, which have become critical to agency operations,, as well as develop new ones. These applications support internal operations such as requisition processing, budget formulation, and equipment tracking as well as major programs, such as the Desk Officer Program, the Annual Questionnaire, the records program, and financial disclosure tracking.

In addition, in fiscal year 2019 OGE will build on its efforts in fiscal year 2018 to identify ways to streamline and reduce inefficiencies in the collection and posting of ethics information. OGE will seek input from ethics officials on these initiatives. By modernizing the collection process, OGE will both increase efficiency and be in a position to better use the data in support of its oversight, education, and support roles.

#### OGE's Website

OGE's website is a key resource for ethics officials as well as OGE's other stakeholders including the media and general public. In fiscal year 2019, OGE will begin the process of redesigning its website. The goal of the redesign is to improve public access to ethics documents, ethics officials' access to key resources needed to perform their jobs, and further ensure IT security.

## **Section IV – Conclusion**

OGE will use its fiscal year 2020 budget request to support the agency's important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business impartially by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in its Annual Performance Report for 2018, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals. Further, as amplified in this justification, OGE will employ its fiscal year 2020 resources to make strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program; holding the executive branch accountable for carrying out an effective ethics program; contributing to the continuity of senior leadership in the executive branch; and engaging the public in overseeing government integrity. OGE will also utilize its fiscal year 2020 resources to advance its management objectives.

## Appendix A – Fiscal Years 2019 and 2020 Performance Goals

<b>Strategic Goal I: Advance a Strong, <u>Uniform</u> Executive Branch Ethics Program</b>			
<b>Strategic Objectives</b>	<b>Performance Goals</b>	<b>Fiscal Year 2019 Target</b>	<b>Fiscal Year 2020 Target</b>
1.1: Provide expert guidance and support to stakeholders	OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps officials perform their ethics job duties.	85%	85%
	Agency administrators are satisfied with the support provided by OGE on <i>Integrity</i> , its electronic public financial disclosure filing system.	70%	70%
1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program	After participating in an OGE training event, officials believe they can more effectively perform their ethics job functions.	90%	90%
	After using a learning tool provided by OGE, officials believe they can more effectively perform their ethics job functions.	85%	85%
1.3: Continuously refine ethics policy and issue interpretive guidance	Legal and Program Advisories help officials perform their ethics job duties.	80%	80%

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

Strategic Objectives	Performance Goals	Fiscal Year 2019 Target	Fiscal Year 2020 Target
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.	75%	75%
	Agency ethics programs are reviewed within established time frames.	Milestone: 20% of agencies	Milestone: 20% of agencies
2.2: Monitor senior leaders' compliance with individual ethics commitments	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE for second-level review are closed within established time frames.	90%	90%



<b>Strategic Goal III: Contribute to the <u>Continuity</u> of Senior Leadership in the Executive Branch</b>			
<b>Strategic Objectives</b>	<b>Performance Goals</b>	<b>Fiscal Year 2019 Target</b>	<b>Fiscal Year 2020 Target</b>
3.1: Prepare for a Presidential transition	Actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth presidential transitions.	Milestone: Actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth presidential transitions.	Milestone: Provide expertise and/or resources.
	Key transition-related resources are updated within established time frames.	<p>Milestones: Begin updating the Public Financial Disclosure Guide.</p> <p>Begin updating the Ethics Agreement Guide (guide to drafting ethics agreements for PAS nominees).</p>	<p>Milestones: Publish the Public Financial Disclosure Guide.</p> <p>Publish updated Ethics Agreement Guide (guide to drafting ethics agreements for PAS nominees).</p> <p>Publish the Transition Guide.</p> <p>Update the Nominee Ethics Guide and Appendix.</p>
3.2: Provide assistance to 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.	85%	85%
	Final financial disclosure reports of Presidential nominees for Senate-confirmed appointments are certified by OGE within seven business days of receipt from the agency.	90%	90%

<b>Strategic Goal IV: Engage the Public in Overseeing Government Integrity</b>			
<b>Strategic Objectives</b>	<b>Performance Goals</b>	<b>Fiscal Year 2019 Target</b>	<b>Fiscal Year 2020 Target</b>
4.1: Inform the public about OGE and the executive branch ethics program	In lieu of performance goals, OGE tracks a variety of indicators.	Indicators: - Twitter engagement rate - Number of ethics documents viewed - # of Public Inquiries - # of Outreach Activities	Indicators: - Twitter engagement rate - Number of ethics documents viewed - # of Public Inquiries - # Outreach Activities
4.2: Make ethics information publicly available	Ethics documents are posted within established time frames.	85%	85%

<b>Management Objectives</b>			
<b>Management Objectives</b>	<b>Performance Goals</b>	<b>Fiscal Year 2019 Target</b>	<b>Fiscal Year 2020 Target</b>
5.1: Sustain a Strong Culture of Performance Management	OGE's Employee Engagement Index score on the Employee Viewpoint Survey.	80%	80%
	Create or revise standard operating procedures for key agency programs.	4 per year	4 per year
5.2: Strengthen organizational compliance and fiscal stewardship	Percentage of OGE employees that take required training (i.e., records, security, privacy, ethics).	90%	90%
	Results of annual financial audit.	Unqualified opinion	Unqualified opinion
5.3: Continuously enhance OGE's information systems and processes	Percent of non-maintenance downtime of <i>Integrity</i> , OGE's network, and website.	<i>Integrity</i> = Establish Baseline Network and Website = <1.0%	Network and Website = <1.0%
	Results of Cybersecurity Risk Management Assessment.	Managing risk for majority of categories	Managing risk for majority of categories



UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**



Preventing Conflicts of Interest  
in the Executive Branch

[www.oge.gov](http://www.oge.gov)