

CY15 Annual Agency Ethics Program Questionnaire Results



**A Snapshot View of the Executive
Branch Ethics Program**

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Section 1 -Introduction

This report summarizes data compiled from responses to the Annual Agency Ethics Program Questionnaire (Annual Questionnaire or questionnaire) for calendar year 2015. These responses were submitted by each executive branch agency to the U.S. Office of Government Ethics (OGE) in early 2016. This report provides a snapshot of the executive branch ethics program.

The first section provides a brief overview of the legal reporting requirement, OGE's survey methodology, and the limitations of the data collected. The second section provides highlights from the summary data. The third section contains the aggregate responses to each question. Finally, the Appendix contains 33 tables of additional comments taken from the individual agency responses to the questionnaire.

Legal Requirement

Pursuant to section 402(e)(1) of the Ethics in Government Act of 1978, as amended, executive branch agencies are required to submit an annual report to OGE. Pursuant to 5 C.F.R. § 2638.602, the report is due to OGE on or before February 1 of each year and covers the previous calendar year. OGE collects this information through its Annual Agency Ethics Program Questionnaire. Ethics officials are asked to provide information on the following topics:

- Organizational Structure
- Ethics Program Administration
- Advice and Counseling
- Education and Training
- Financial Disclosure (Public and Confidential)
- Enforcement
- Advisory Committees/Special Government Employees

Methodology

Each agency received an advance copy of the questionnaire in October 2015 and a hyperlink to the questionnaire in January 2016. A proprietary application collected each response. OGE Desk Officers followed-up with individual agencies for additional information or clarification based a select set of criteria. This summary report reflects the compilation of agency responses.

Response Rate: 100% (133 agencies)

Data Limitations¹

When reviewing this report, it is important to keep data limitations in mind. While OGE reviews certain agency responses for anomalies and follows up as necessary, OGE does not independently verify the submitted information. Further, OGE held focus groups in 2014, which resulted in revisions to the wording of certain portions of the Annual Questionnaire. Even so, questions are still open to differing interpretations by agencies, which may result in data variation.

¹ This report does not include classified information. Therefore, the aggregate number for certain questions may be higher than reported.

Section 2 - Key Highlights²

DAEO/ADAEO

- There are very few DAEO/ADAEO vacancies. (Q.3-4)
- 59% of DAEOs have less than four years of experience in the position. (Q.3)
- 64% of ADAEOs have less than four years of experience in the position. (Q.4)
- 92% of DAEOs spend less than 50% of their time on ethics. (Q.3)
- 73% of ADAEOs spend less than 50% of their time on ethics. (Q.4)
- A large majority of DAEOs (84%) and ADAEOs (94%) are career employees. (Q.3-4)

Resources

- There are approximately 6,727 individuals that support the ethics program. Of these, approximately 62% performed 2-30 hours of ethics duties per week, and approximately 8% performed 31 or more hours of ethics duties per week. (Q.5)
- 31% (2,098) of individuals performing ethics program duties are stationed within the D.C. metropolitan area, while 69% (4,629) of individuals performing ethics program duties are stationed outside the metro area. (Q.5)
- 29% of agencies reported needing additional resources. Similar to 2014, human capital was the most requested resource, closely followed by technology and then budgetary resources. (Q.12-13)
- 22% of ethics programs are supported by contractors. (Q.8) Agencies reported that contractors mostly provide clerical assistance or support the financial disclosure system. (Q.9)

Structure of the Program

- 69% of DAEOs/ADAEOs had supervisory authority over the ethics officials that support their agency's ethics program. (Q.6)
- Ethics education and training, ethics advice and counseling, and the confidential financial disclosure program, are most likely delegated outside the DAEO/ADAEO supervisory chain. (Q.7)

Program Administration

- 2015 saw no shift in where the most time was spent administering an ethics program. (Q.11)
Top 4 in 2014 and 2015: (1) Advice and Counseling; (2) Confidential Financial Disclosure (3) Education and Training; and (4) Public Financial Disclosure
- 58% of agencies reported conducting self-assessments. (Q.17)
- 17% (23) of agencies identified transitioning to an automated e-filing system as a potential challenge. (Q.22)

² Highlights are drawn from agency responses as reported in calendar year 2015, unless otherwise noted.

Leadership

- All but one agency reported that their leadership demonstrates support for their ethics program. (Q.14)
- 65% of agencies reported that ethics staff met with the agency head to discuss the strengths and weaknesses of the ethics program. (Q.15)

Succession Planning

- The majority of agencies conduct succession planning. The top two tools used to address succession planning were: (1) knowledge library (99 agencies) and (2) written standard operating procedures (92 agencies). (Q.16)
- The majority of agencies have professional development for their ethics officials. The top two sources for professional development were: (1) structured courses (104 agencies) and (2) mentoring (78 agencies). (Q.16)
- Most agencies have written procedures for financial disclosure, pursuant to 5 U.S.C. app. § 402(d)(1). (Q.19)
- 32% of “career” DAEOs are eligible to retire. 27% of “career” ADAEOs are eligible to retire. (Q.3-4)

Initial Ethics Orientation

- 73% of employees received Initial Ethics Orientation (IEO) within the 90 day requirement. (Q.23)
- An overwhelming majority (98%) of agencies conduct IEO as part of employee in-processing. (Q.24)
- One-on-one briefings and in-person classroom instruction continued to be the two most popular methods for delivering IEO. (Q.25)
- Most agencies (119) reported developing their own materials, while 53 agencies indicated that they used materials developed by OGE, and 22 indicated that they used materials developed by another agency. (Q.26)

Annual Ethics Training

- 98% of public and confidential financial disclosure filers received Annual Ethics Training (AET). (Q.27)
- In-person classroom instruction and self-paced, web-based instruction continued to be the two most popular methods for delivering AET. (Q.28)
- 74% of agencies provided annual training to persons not required by the regulation to receive training. (Q.30)
- Most agencies (117) reported developing their own materials, while 41 agencies indicated using materials developed by OGE, and 30 agencies indicated using materials developed by another agency. (Q.29)
- 74% of agencies provided additional, specialized training. Of those, 20% provided additional, specialized training to supervisors, and 17% did so for procurement officials. (Q.31-32)

Advice and Counseling

- The two topics that employees most frequently sought guidance on were: (1) gift acceptance (43 agencies ranked this #1) and (2) financial disclosure reporting (27 agencies ranked this #1). (Q.33)

Financial Disclosure

Note: #s reflect the number of reports submitted rather than the number of filers.

- 79% of agencies reported receiving timely notification of the appointment of new entrant employees required to file financial disclosure reports. (Q.44)
- 24,874 public financial disclosure reports (new entrant, annual, combination, and termination) were required to be filed in CY 2015; and agencies reported 24,490 reports filed. (Q.37)³
- Career SES represented the highest proportion (41%) of reports required to be filed. Out of these, agencies reported that 10,301 reports were required to be filed and that 10,702 reports (99%) were actually filed. (Q.37)⁴
- Termination reports had the lowest compliance rate (97% filed). (Q.37)⁵
- 11,226 periodic transaction reports were filed. (Q.39)
- Intermediate review of public financial disclosure reports conducted by someone other than an ethics official was utilized by 19% of agencies. (Q.45)
- When collecting delinquent public financial reports the most common step taken was sending repeated reminders to filers, followed by notifying the filer's supervisor. (Q.46)
- 99% of confidential financial disclosure reports required to be filed were filed. (Q.50)
- 7,283 filing extensions were granted to 450 filers. (Q.52)

Electronic Filing

- 80 (60%) agencies reported using some form of electronic financial disclosure system. (Q.47)
- 28 (21%) agencies reported using only OGE's *Integrity* system for their electronic financial disclosure system.⁶ (Q.48)
- 30 agencies (22%) reported using an electronic financial disclosure filing system other than OGE's *Integrity* system, at a cost of approximately \$7,916,621.00. (Q.47 and 49).

Remedies

- Recusals represented 61% of remedial actions taken in response to information regarding a conflict of interest reported on OGE Form 278. (Q.55)
- 104 § 208(b)(1) and 309 § 208(b)(3) waivers were granted. (Q.58 and 60)

³ This excludes numbers partially submitted for national security reasons.

⁴ This excludes numbers partially submitted for national security reasons.

⁵ This excludes numbers partially submitted for national security reasons.

⁶ Currently in CY2016 there are over 130 agencies using OGE's *Integrity* system.

Enforcement

- The number of disciplinary actions and referrals declined between 2014 (2,440) and 2015 (1,584). (Q.62-64)

Advisory Committees/Special Government Employees

- Agencies reported that there were 36,118 Special Government Employees as of December 31, 2015, a decrease of roughly 21% from 2014. (Q.73)
- Agencies reported 786 FACA committees with 30,879 members and 133 non-FACA committees with 1,454 members. (Q.68-71)

Section 3 – Compilation of Agency Responses

The information in this section represents a summary of the responses provided by the 133 reporting agencies.

ORGANIZATION/RESOURCES

1. Agency: **133 (100% Response Rate)**
2. Number of full-time agency employees as of December 31, 2015: **3,664,787**
3. Information about the Designated Agency Ethics Official (DAEO):⁷

	DAEO
a. Vacant (as of December 31, 2015)	<input type="checkbox"/> Yes (<i>skip to 3b and then 4</i>) 3 (2%) <input type="checkbox"/> No (<i>go to 3c</i>) 130 (98%)
b. When did the position become vacant?	Month/Year
c. Name	
d. Title	
e. Time in current DAEO position	<input type="checkbox"/> 10 or more years 25 (19%) <input type="checkbox"/> 5 - 9 years 28 (21%) <input type="checkbox"/> 1 - 4 years 50 (38%) <input type="checkbox"/> Less than 1 year 27 (21%)
f. Total years performing ethics duties	
g. Grade level	<input type="checkbox"/> Executive Schedule 13 (10%) <input type="checkbox"/> SES or equivalent 73 (56%) <input type="checkbox"/> GS 15 38 (29%) <input type="checkbox"/> GS 14 and below 6 (5%)
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 104 (80%) <input type="checkbox"/> 26-50% 16 (12%) <input type="checkbox"/> 51-75% 1 (0.8%) <input type="checkbox"/> 76-100% 9 (7%)
i. Was the DAEO eligible to retire as of December 31, 2015?	<input type="checkbox"/> Yes 42 (32%) <input type="checkbox"/> No 87 (67%) <input type="checkbox"/> Not Categorized 1 (0.8%)
j. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 110 (85%) <input type="checkbox"/> political appointee 19 (15%) <input type="checkbox"/> Not Categorized 1 (0.8%)

⁷ For the purposes of this aggregate summary, questions asking for responses that cannot be aggregated were omitted, as indicated by the strikethrough of the question text.

4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

	ADAEO
a. Position Vacant (as of December 31, 2015)	<input type="checkbox"/> Yes (<i>skip to 4b and then 5</i>) 3 (2%) <input type="checkbox"/> No (<i>go to 4c</i>) 130 (98%)
b. When did the position become vacant?	Month/Year
c. Name	
d. Title	
e. Time in current ADAEO position (years)	<input type="checkbox"/> 10 or more years 23 (18%) <input type="checkbox"/> 5 - 9 years 24 (18%) <input type="checkbox"/> 1 - 4 years 59 (45%) <input type="checkbox"/> Less than 1 year 24 (18%)
f. Total years performing ethics duties	
g. Grade level	<input type="checkbox"/> Executive Schedule 4 (3%) <input type="checkbox"/> SES or equivalent 36 (28%) <input type="checkbox"/> GS 15 58 (45%) <input type="checkbox"/> GS 14 and below 32 (25%)
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 73 (56%) <input type="checkbox"/> 26 -50% 22 (17%) <input type="checkbox"/> 51-75% 11 (8%) <input type="checkbox"/> 76-100% 24 (18%)
i. Was the ADAEO eligible to retire as of December 31, 2014?	<input type="checkbox"/> Yes 35 (27%) <input type="checkbox"/> No 94 (72%) <input type="checkbox"/> Not Categorized 1 (0.8%)
j. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 122 (94%) <input type="checkbox"/> political appointee 8 (6%)

5. Number of employees who performed ethics program duties in 2015; e.g., financial disclosure, education and training, advice and counseling, program administration.

Duty Station	Approximate amount of time spent each week performing ethics duties					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	2-10 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*)	
D.C. Metro area	595	704	252	100	447	2098 (31%)
Outside the D.C. Metro area	1413	2332	496	275	113	4629 (69%)
TOTAL	2008 (30%)	3036 (45%)	748 (11%)	375 (5%)	560 (8%)	6727

*FTE = Full Time Equivalent

6. Does the DAEO/ADAEO have supervisory authority over the employees identified in question #5?

- Yes (skip to #8) **92 (69%)**
- No (go to #7) **28 (21%)**
- Not Applicable (skip to #8) **13 (10%)**

7. Indicate which elements of the ethics program have been delegated outside of the supervisory chain of the DAEO or ADAEO. Check all that apply.

- Assessment of program performance **7**
- Confidential financial disclosure program **17**
- Ethics advice and counseling **17**
- Ethics education and training **17**
- Public financial disclosure program **6**
- Other (specify) 15 **Table 1**
- Not Categorized **100**

8. Do contractors support the ethics program?

- Yes (go to #9) **30 (23%)**
- No (skip to #10) **103 (77%)**

9. Describe the extent of their support. **Table 2**

10. Identify the agency ethics officials who have ethics duties as a distinct element in their **performance standards**. Check all that apply.

- DAEO **97**
- ADAEO **96**
- All ethics officials (excluding DAEO/ADAEO) **41**
- Some ethics officials (excluding DAEO/ADAEO) **32**
- None **13**

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. **Table 3**

PROGRAM ADMINISTRATION

11. Use the following scale to rate the amount of time your agency spends to administer each item. The first six categories exclude time devoted to SGE's.

Time Spent Scale: 1= No time 2=Limited amount of time 3=Moderate amount of time
4=Significant amount of time 5=Very significant amount of time

Advice and counseling 45 ranked this a 5 (1st)	1	2	3	4	5
Confidential financial disclosure program 24 ranked this a 5 (3rd)	1	2	3	4	5
Disciplinary process for violations 0 ranked this a 5 (8th)	1	2	3	4	5
Education and training 19 ranked this a 5 (4th)	1	2	3	4	5
Outside activity approval 4 ranked this a 5 (5th)	1	2	3	4	5
Public financial disclosure program 28 ranked this a 5 (2nd)	1	2	3	4	5
Special Government Employee activities 4 ranked this a 5 (5th)	1	2	3	4	5
Other (specify) 4 ranked this a 5 (5th)	1	2	3	4	5

12. Are additional resources needed for the ethics program? (e.g., budgetary, human capital, technology, etc.)

- Yes (go to #13) **39 (29%)**
 No (skip to #14) **94 (71%)**

13. Which additional resources are needed? Check all that apply.

- Budgetary **18**
 Human Capital **31**
 Technology **28**
 Other (specify) **6 Table 4**

14. My agency's leadership (e.g., the agency head, senior executives, and first-line managers) demonstrates support for the ethics program.

- Yes **132 (99%)**
 No **1 (1%)**

15. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2015?

- Yes **86 (65%)**
 No **47 (35%)**

16. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2015? Check all that apply.

Professional Development

- Competency/skills gap assessment **41**
- Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development) **51**
- Individual development plans **47**
- Mentoring **78**
- Structured courses (e.g., classroom training, webinars, online modules, etc.) **104**
 - Provided by OGE **92**
 - Provided by my agency **39**
 - Provided by another agency **22**
 - Not categorized **2**
- Other (specify) 24 **Table 5**
- None **18**

Programmatic tools

- Job Aids **50**
- Knowledge library (intranet, videos, shared drives, etc.) **99**
- Resources assessment (personnel and/or financial) **40**
- Written standard operating procedures **92**
- Other (specify) 12 **Table 5**
- None **18**

17. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) conduct a self-assessment to evaluate any aspect of the ethics program in 2015?

- Yes (*go to #18*) **77 (58%)**
- No (*skip to #19*) **56 (42%)**

18. What did you assess? Check all that apply.

- Accuracy of advice and counsel **43**
- Administration of confidential financial disclosure program **46**
- Administration of public financial disclosure program **50**
- Compliance with applicable ethics laws and regulations **47**
- Consistency of advice and counsel **46**
- Employee knowledge after training **21**
- Employee knowledge before training **12**
- Employee perceptions about the agency's ethical culture **19**
- Employee perceptions about the ethics program **23**
- Knowledge and skills of ethics officials **39**
- Employee satisfaction with training offered **36**
- Employee knowledge of the ethics rules **31**
- Timeliness of advice and counsel **44**
- Other (specify) **12 Table 6**

19. Do you have written policies or procedures in place for the following? Check all that apply.

- Collection of confidential financial disclosure reports **126**
- Collection of public financial disclosure reports **130**
- Following up with delinquent confidential financial disclosure filers **106**
- Following up with delinquent public financial disclosure filers **109**
- Public availability of public financial disclosure reports **92**
- Review/evaluation of confidential financial disclosure reports **108**
- Review/evaluation of public financial disclosure reports **113**

20. Does your agency provide ethics program services for any board, commission, or agency that is independent of your agency?

- Yes (please provide the names of the board, commission, or agency) **15 Table 7**
- No **118**

21. Please list any significant accomplishments your ethics program achieved in 2015. **Table 8**

22. Please list the greatest challenges facing your ethics program in the short term (next 1-3 years). **Table 9**

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. **Table 10**

EDUCATION AND TRAINING

23. How many employees (including Special Government Employees) were required to have received Initial Ethics Orientation (IEO) by December 31, 2015 **403,723**⁸
- a. How many of those employees received IEO within the 90 day requirement? **296,318 (73%)**⁹
 - b. How many of those employees received IEO beyond the 90 day requirement? **6,418 (2%)**
 - c. How many of those employees have not received IEO as of today? **100,328 (25%)**
24. Is IEO part of your agency's on-boarding process for new employees?
- Yes **131 (98%)**
 - No **2 (2%)**
25. How do you deliver IEO to new employees? Check all that apply.
- Classroom instruction (in-person) **82**
 - Instructor-led web-based **13**
 - One-on-one briefings **85**
 - Satellite broadcast/videoconference **24**
 - Self-paced web-based **42**
 - Video **16**
 - Written materials **70**
 - Other (specify) **24 Table 11**
26. Who developed the IEO training materials? Check all that apply.
- My agency **119**
 - OGE **53**
 - Another agency **22**
 - How did you access the training materials? Check all that apply.
 - OGE (e.g., OGE's page on MAX.gov, Desk Officer, etc.) **8**
 - Directly from the agency **14**
 - Other (specify) **3 Table 12**
 - Other (specify) **8 Table 13**

⁸ An agency indicated that its internal tracking mechanisms resulted in anomalies in its course completion data. As a result, the agency indicated that its responses to this question are an approximation.

⁹ An agency reported that one of its divisions inadvertently stopped giving initial ethics training. The agency indicated that it is taking corrective action.

27. Required Annual Ethics Training* (verbal and written)

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)	Compliance Rate
Public filers (OGE Form 278) – PAS	651	628	96%
Public filers (OGE Form 278) - non-PAS	20,858	20,241	97%
Confidential filers (OGE Form 450, 450A, and OGE-approved alternative confidential financial disclosure forms)	345,565	338,580	98%
Other employees required by 2638.705(a) (employees appointed by the President; employees of the Executive Office of the President; Contracting Officers; other employees designated by the head of the agency or his or her designee based on their official duties.)	95,650	104,459 (Note: OGE believes the number “received” is higher than the number required because some agencies included all employees that receive training but did not mark them as having been required to attend the training)	
TOTAL	462,724	463,908 (100.2%)	

* Note about counting: Only include those employees that were required by 5 C.F.R. § 2638.705 to receive annual ethics training, either verbal or written, during the calendar year.

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: **Table 14**

28. How do you deliver annual ethics training to employees required to receive training? Check all that apply.

- Classroom instruction (in-person) 99
- Instructor-led web-based 22
- One-on-one briefings 74

- Self-paced web-based **75**
- Video **28**
- Satellite broadcast/videoconference **30**
- Written materials **60**
- Other (specify) 14 **Table 15**

29. Who developed the annual training materials? Check all that apply.

- My agency **117**
- OGE **41**
- Another agency **30**
 - How did you access the training materials? Check all that apply.
 - OGE (e.g., OGE’s page on MAX.gov, Desk Officer, etc.) **10**
 - Directly from the agency **22**
 - Other (specify) **6 Table 16**

30. Did you provide annual ethics training to other employees not otherwise required by regulation to receive training?

- Yes **99 (74%)**
- No **34 (26%)**

31. Did you provide additional, specialized ethics training during 2015?

- Yes (*go to #32*) **79 (59%)**
- No (*go to #33*) **54 (41%)**

32. Which groups did you target? Check all that apply.

- All agency personnel **31**
- HR Officials **13**
- IT personnel **12**
- Procurement Officials **29**
- Supervisors **34**
- Other (specify) **52 Table 17**

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. **Table 18**

ADVICE AND COUNSELING

33. From the list below, select the three topics that your employees most **frequently** sought guidance on in 2015.

Awards	Selection 1: 2	Selection 2: 0	Selection 3: 0
Conflicting financial interests	Selection 1: 19	Selection 2: 8	Selection 3: 3
Gift acceptance (excluding awards and travel, subsistence, and related expenses from non-federal sources)	Selection 1: 43	Selection 2: 21	Selection 3: 16
Financial Disclosure Reporting	Selection 1: 27	Selection 2: 27	Selection 3: 15
Impartiality in performance of official duties	Selection 1: 4	Selection 2: 15	Selection 3: 5
Misuse of position, Government resources and information	Selection 1: 2	Selection 2: 4	Selection 3: 3
Outside employment/activities	Selection 1: 16	Selection 2: 35	Selection 3: 28
Post-employment restrictions	Selection 1: 14	Selection 2: 14	Selection 3: 25
Travel, subsistence, and related expenses from non-federal sources	Selection 1: 5	Selection 2: 6	Selection 3: 31
Other (specify)	Selection 1: 1	Selection 2: 3	Selection 3: 7

34. Has your agency ethics program implemented any of the following practices? Check all that apply.

- Conduct customer satisfaction survey(s) **17**
- Periodic supervisory review of advice given **61**
- Guided discussion among staff **79**
- Memorialize advice and counsel **115**
- Use advice and counsel templates **65**
- Use a database Check all that apply. **65**
 - to track timeliness **65**
 - to conduct research **34**
 - to identify topics for training **26**
- Other (specify) **10 Table 19**
- None **10**

35. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2015? **1,368**

36. How do you make employees aware of the availability of post-employment counseling? Check all that apply.

- Part of out-processing **117**
- Emails **59**
- Training **92**
- Regulation or policy **27**
- Other (specify) **20 Table 20**
- None **0**
- Not Applicable **4**

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. **Table 21**

PUBLIC FINANCIAL DISCLOSURE

37. Report the number of public financial disclosure reports (OGE Form 278) required to be filed by December 31, 2015, **excluding SGEs**, and the number of reports actually filed (i.e., received in hand) by December 31, 2015.

OGE Form 278 Reports Required to be Filed in CY 2015

OGE Form 278 Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	Total
Nominee/ New Entrant	Required	130	205	1,201	420	1,259	3,215
	Filed	130	202	1,277	411	1,236	3,256 (101%)
Annual	Required	676	1,179	8,726	1,143	7,507	19,231
	Filed	676	1,177	8,782	1,139	7,308	19,082 (99%)
Termination	Required	80	152	754	155	830	1,971
	Filed	78	151	813	150	802	1,994 (101%)
Combination ¹	Required	21	78	120	50	188	457
	Filed	21	72	218	50	185	546 (119%)
Total	Required	907	1,614	10,801	1,768	9,784	24,874
	Filed	905 (99.8%)	1,602 (99%)	11,090 (103%)¹⁰	1,750 (99%)	9,531 (97%)	24,878 (100%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc.

¹⁰ This result stems from certain information being nonreportable because that information is classified.

38. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports, **excluding SGEs***:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278 Reports	4,886	286	61

39. Number of periodic transaction reports filed, **excluding SGEs*** **11,226**

* Note about counting: Count the total number of periodic transaction reports filed. *Example 1:* If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the table above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12” in the table.

40. Extensions and late fees for periodic transaction reports, **excluding SGEs**:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278 T Reports	307	377	93

41. Number of public financial disclosure filers reported in calendar year 2015 to the Attorney General for failure to file: **4**

42. How many requests for public financial disclosure reports did you receive in 2015: **324**

43. Does your agency use an automated system (e.g., Excel, Access, custom database) to track the administration of the financial disclosure program?

- Yes **90 (68%)**
 No **43 (#32%)**

44. Did you receive timely notification of all new entrant employees required to file a new entrant financial disclosure report?

- Yes **105 (79%)**
 No **28 (21%)**

45. Does your agency require an intermediate review by someone other than ethics staff (e.g., supervisors and team leads) for public financial disclosure reports?

- Yes **107 (80%)**
 No **26 (20%)**

46. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply.
- Repeated reminders to the filer **104**
 - Notify supervisor **71**
 - Certified letter to the filer **15**
 - Notify agency head or other senior official **54**
 - Referral to Department of Justice **7**
 - Other (specify) **8** Table 22
 - None **1**
 - Not Applicable **26**
47. Does your agency use an electronic financial disclosure filing system (e-filing system)? Note: This includes *Integrity*.
- Yes (*go to #48*) **80 (60%)**
 - No (*skip to Part 9*) **53 (40%)**
48. Which system does your agency use? Check all that apply.
- Integrity* (*if only Integrity is selected, go to Part 9*) **28 (35%)**
 - Other (specify) **52 (65%)** (*if Integrity and Other or just Other are selected go to #49*)
49. Indicate your fiscal year 2015 actual and fiscal year 2016 projected costs for using the e-filing system. Note: Do not include costs to operate *Integrity*.
- a) total FY 2015 actual costs **\$7,916,621**
 - b) total FY 2016 projected costs **\$7,272,009**
 - c) amount paid to a non-federal vendor in FY 2015 **\$3,691,677¹¹**
 - d) amount projected to be paid to a non-federal vendor in FY 2016 **\$3,337,621**
 - e) amount paid to a federal agency in FY 2015 **\$3,678,369**
 - f) amount projected to be paid to a federal agency in FY 2016 **\$3,782,989**
 - g) amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2015 **\$4,353,959**
 - h) amount projected for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2016 **\$4,688,556**
 - i) number of public financial disclosure filers who filed electronically in FY 2015 **12,700**
 - j) number of public financial disclosure filers projected to file electronically in FY 2016 **13,702**

¹¹ The Department of the Army accounted for 78% of spending on contractors in FY 2015.

k) number of confidential financial disclosure filers who filed electronically in
FY 2015 **226,064**

l) number of confidential financial disclosure filers projected to file electronically in
FY 2016 **211,652**

50. Indicate which forms your agency uses the e-filing system for. Check all that apply.

- Public Financial Disclosure (OGE Form 278) **49**
- Periodic Transaction (OGE Form 278-T) **21**
- Confidential Disclosure Forms (OGE Form 450, 450A, or OGE-approved alternative) **50**
- Not Categorized **28**

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. **Table 23**

CONFIDENTIAL FINANCIAL DISCLOSURE

51. Report the number of confidential financial disclosure reports required to be filed by December 31, 2015, **excluding SGEs**, and the number of reports actually filed by December 31, 2015.

Confidential financial disclosure reports required to be filed in CY 2015:

Type of Report	# Required to File (by December 31)	# Filed	
		450	450A
OGE Form 450/450A	325,995¹²	268,002	40,571
OGE-approved alternative form	17,849	32,050	
Total	343,844	340,623 (99%)	

Note: Some agencies included the individuals that filed a 450A in the required to file a Form 450 column.

52. Number of OGE 450, 450A, or OGE-approved alternative forms granted filing extensions in 2015.
7,283¹³
53. What steps do you take to collect delinquent confidential financial disclosure reports?
- Repeated reminders to the filer **105**
 - Notify supervisor **79**
 - Notify agency head or other senior official **49**
 - Other(specify) **9 Table 24**
 - None **2**
 - Not Applicable **25**

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. **Table 25**

¹² Agencies may have included individuals in the required to file a 450 field who actually filed alternative forms.

¹³ This number is lower than the number reported in the 2014 Annual Questionnaire responses. According to the Department of the Army's 2014 Annual Questionnaire response, they experienced a glitch in FDM that caused a grant of blanket extensions.

REMEDIES AND ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL, AND CIVIL STATUTES

54. Number of public financial disclosure filers who took specific remedial actions because of information on a new entrant, annual, or termination report (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2015: **358**
- Don't know/don't track **27**
55. Number of individual remedial actions taken because of information on a new entrant, annual, or termination public financial disclosure (OGE Form 278) report in 2015:
- Recusals **391**
Divestitures **172**
Resignations from outside positions **58**
Reassignments **1**
Other not listed (specify) **17**
Don't know/don't track **27**
56. Number of public financial disclosure filers who took specific remedial actions because of information on periodic transaction reports (e.g., divestiture, resignation from outside position, written disqualification, U.S.C. § 208 waiver, reassignment, etc.) in 2015: **32**
- Don't know/don't track **27**
57. Number of remedial actions taken because of information on a periodic transaction report in 2015:
- Recusals **18**
Divestitures **9**
Reassignments **0**
Other not listed (specify) **6 Table 26**
- Don't know/don't track **26**
58. Number of § 208(b)(1) waivers granted in 2015 **104**
59. Number of § 208(b)(1) waivers provided to OGE in 2015 **71**
60. Number of § 208(b)(3) waivers granted in 2015 **309**
61. Number of § 208(b)(3) waivers provided to OGE 2015 **307**
62. Number of disciplinary actions taken based wholly or in part upon violations of the Standards of Conduct provisions (5 CFR part 2635) in 2015. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. **1,584**

a. Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

- Subpart A **439 (28%)**
- Subpart B **18 (1%)**
- Subpart C **9 (0.6%)**
- Subpart D **38 (2.4%)**
- Subpart E **24 (1%)**
- Subpart F **1 (0.06%)**
- Subpart G **948 (60%)**
- Subpart H **33 (2%)**

63. Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 207, 208, and 209 in 2015. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents. **22**

a. Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

- 18 U.S.C. §203 **0 (0%)**
- 18 U.S.C. §205 **0 (0%)**
- 18 U.S.C. §207 **0 (0%)**
- 18 U.S.C. §208 **20 (91%)**
- 18 U.S.C. §209 **0 (0%)**

64. Number of referrals made to the Department of Justice of potential violations of the criminal conflict of interest statutes in 2015: **56**

- a. How many of those referrals were accepted for prosecution **10 (19%)**
- b. How many of those referrals were declined for prosecution **38 (68%)**
- c. How many of those referrals resulted in disciplinary or corrective action **15 (27%)**

65. Which individual(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202)? Check all that apply.

- DAEO/ADAEO **89**
- General Counsel **39**
- Agency Head **12**
- IG **44**
- Other (specify) **6 Table 27**

66. Did you submit all referral(s) and disposition(s) of the referral(s) to OGE via OGE Form 202 (as required by 5 CFR 2638.603(c))?

- Yes **12**
- No **9**
- Not Applicable **112**

***ADDITIONAL COMMENTS FOR PART 10.** Please indicate the question number to which the comment corresponds. **Table 28**

ADVISORY COMMITTEES & SPECIAL GOVERNMENT EMPLOYEES (SGEs)

67. Does your agency have any FACA or Non-FACA advisory committees, boards, or commissions, or any SGEs (including those not on committees, boards, or commissions)?
- Yes (*go to #67*) **62 (47%)**
 - No (*go to end*) **71 (53%)**
68. Number of FACA advisory committees: **786**
69. Number of FACA advisory committee members: **30,879**
70. Number of non-FACA advisory committees, boards, or commissions: **133**
71. Number of non-FACA advisory committee, board, or commission members: **1,454**
72. Does your agency have any SGEs (as of December 31, 2015)?
- Yes (*go to #73*) **77 (58%)**
 - No (*go to end*) **56 (42%)**
73. Number of special Government employees (SGEs) as of December 31, 2015: **36,118**
74. Does your agency have written policies or procedures for designating SGE status?
- Yes **47 (61%)**
 - No **20 (26%)**
 - Not applicable **10 (13%)** (specify why) **Table 29**
75. Does the written policy or procedure include consultation with the ethics office?
- Yes **44 (57%)**
 - No **13 (17%)**
 - Not applicable **20 (26%)** (specify why) **Table 30**
76. Does the ethics office provide training to SGEs, who serve on committees or participate in board meetings, prior to attendance at their first committee or board meeting?
- Yes (*skip to #77*) **62 (80%)**
 - No (*go to # 78*) **5 (6%)**
 - Not Applicable (*skip to #78*) **10 (13%)**
77. Which office provides the training? **Table 31**

78. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2015 and the number of reports actually filed by December 31, 2015.

Financial disclosure reports required to be filed by SGEs in CY 2015:

Type of SGE	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278)	
	Required	Filed	Required	Filed
Advisory Committee Members (FACA)	25,523	23,140 (91%)	17	18 (106%)
Advisory Committee Members (non-FACA)	329	328 (99.7%)	0	0 (N/A%)
Experts/Consultants	1,988	1,988 (100%)	60	50 (83%)
Board Members	195	295 (151%)	48	48 (100%)
Commissioners	78	78 (100%)	10	10 (100%)
Other	198	198(100%)	26	26 (100%)
TOTAL	28,311	26,027 (92%)	161	152 (94%)

79. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. 2634.904(b). **24,000**

80. Extensions and late filing fees for SGE financial disclosure reports

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278 Reports	49	1	1

81. Number of OGE Form 450 Reports or OGE-Approved Alternative Forms filers granted filing exemptions. **223**

ADDITIONAL COMMENTS FOR PART 11. Please indicate the question number to which the comment corresponds. **Table 32**

ADDITIONAL QUESTIONNAIRE COMMENTS. Table 33

APPENDIX - Comments¹⁴

7. Indicate which elements of the ethics program have been delegated outside of the supervisory chain of the DAEO or ADAEO. Check all that apply. **Table 1**

The answer to question # 6 is as follows: One employee is subject to the DAEO's supervision. Another employee is not. The employee who is not subject to the DAEO's supervision is in the CSB's field office in Denver and helps out with training and other matters. So, nothing has been fully delegated outside of the DAEO's authority.
Timekeeper tracking SGE activities/days worked.
Senior management official, outside of the supervisory chain of the DAEO and ADAEO, serves as a deputy ethics official to correspond with OGE on program administration matters and to receive ethics inquiries in the event other ethics officials are unavailable. All ethics advice and determinations are coordinated with the DAEO or ADAEO.
The Attorney Advisor for the Pretrial Services Agency (PSA) handles all outside employment/activity requests from that agency. Although the DAEO and ADAEO do not have direct supervision of this employee, the ADAEO reviews and approves her decisions prior to submission to PSA staff.
While DOJ's DAEO has authority over all of these elements of the ethics program (and more), ethics program duties are performed by employees, many of whom are not in the DAEO's direct supervisory chain.
Approving certain requests to engage in outside employment.
Gifts to the agency under ONDCP's gift authority.
We have delegated ethics duties to three other OGC staff members to perform ethics duties outside of the DAEO and ADAEO. The title for one of these individuals is Deputy Ethics Official. The other two individuals are the OGC Policy & Program Analyst and the Administrative Specialist.
Classification of positions and compensations decisions and associated information that determine who are 278/450 filers.
Gift Travel From a Non-Federal Source.
DAEO/Office of the General Counsel provides governance and oversight of the ethics program. The Alternate DAEO and one Deputy DAEO are in the DAEO's supervisory chain. The Ethics & Employee Concerns organization (outside the DAEO's chain of command) is responsible for program administration, including day-to-day activities, advice and counsel, training, and financial disclosure reporting.
The Postmaster General has delegated to the Office of Inspector General (OIG) responsibilities relating to financial disclosure program, ethics advice and counseling, education and training, and the public financial disclosure program with respect to OIG employees.

9. Describe the extent of their support. **Table 2**

We use an IT support contract to provide a software platform for review of form 450.
<ul style="list-style-type: none">• Developing and conducting training• Maintaining, distributing, and collecting financial disclosure reports• Reviewing for technical completeness (but not certifying) financial disclosure reports• Preparing the draft version of written ethics advice or an advisory opinion, to be issued by an ethics official who is a Government employee and,• Maintaining ethics program records, including notifying OGE of criminal referrals to DOJ and notifying the DAEO or OGE of administrative action taken in response to an ethics violation.

¹⁴ Comments are unedited except for punctuation and capitalization (when indicated). Comments of "none" or "N/A" have been removed.

Assisting the Ethics Program Manager manage our financial disclosure reporting system (FDonline).
CNCS uses FDonline for its electronic financial disclosure system.
Contracting attorneys receive and provide advice on ethic inquiries that come through the Office of General Counsel helpdesk on their respective duty day.
Contract secretary tracks training, receives disclosure forms under cover, and provides forms to DAEO.
Primarily administrative type support and database management for financial disclosure and training programs.
Minor administrative processing functions at field locations.
They provide administrative support and do not perform any inherently governmental functions.
Financial disclosure support and other administrative support.
For HUD OIG, contractors are providing training and support for the Integrity & Compliance Program.
Some DOJ components utilize contractors to support the ethics program. The extent of the support includes IT needs such as utilizing databases and spreadsheets to help track financial disclosure and training, developing and maintaining ethics websites, tracking ethics program requirements, and other reporting and administrative duties. One component utilizes a contractor paralegal for additional program support including financial disclosure compliance, assistance with ethics opinions including review of approvals for employees, research and drafting opinions for the DDAEO, and preparing reports for OGE.
One administrative assistant assists with the Financial Disclosure Management System (FDM).
The National Guard Bureau uses contractors at its headquarters to provide ethics program support, FDM administration services, and training coordination.
Contractors support the technical review of OGE form 278s.
Filing, record keeping, administrative tasks, [and] A/V support for training.
IT Contractors help support our e-filing system for OGE Form 450's.
The IT Support team helps the ethics program by capturing and providing the data that reflect which FTEs have taken ethics training.
The Department of Commerce provided annual ethics training for the Commission.
Administrative support.
Agency has IAA with Dept. of Commerce OGC for ethics legal services.
Personal services contractors participate in ethics training and comply with ethics and regulations.
Contractors who work as Contract Specialists in the Contract Procurement Management Department are required to take the Ethics Training.
Some centers use contractors for administrative/clerical support functions. Additionally, at Glenn Research Center a contractor provides substantive support with preliminary review, tracking, the Ethics Program Tracking System (EPTS), and drafting WAGs and post-employment opinions. At the NASA Shared Services Center (NSSC), contractors provide information technology support to operate, maintain, and optimize EPTS.
Contractors provide financial disclosure eFile support.
Supports training and publicizes ethics services.
Currently, the OGC General Law & Ethics Group (GLE) has 3 full-time employees out of the office on temporary, long-term absences. Since September 2015, we have employed a contractor employee to assist in supporting the ethics program. In addition to other GLE matters, the contractor employee assists in providing ethics advice and reviewing speaking engagement forms. All advice/guidance is reviewed by the DAEO, ADAEO, or the GLE Assistant General Counsel.
We have a contractor that assists us in running our Personal Trading Compliance System which SEC employees use to clear trades.
Financial Disclosure Management support.
Financial Disclosure Systems Database (FDS) programming and maintenance.

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. **Table 3**

The DAEO has supervisory authority over ethics employees, based in Washington. DC. The ethics program is conducted chiefly within the main ethics office. In cooperation with the main ethics office, the Deputy DAEO(s) abroad are responsible for conducting ethics training, providing ethics advice, and reviewing OGE 450(s) at the overseas missions.
Question 6 - The ADAEO is under the supervision of the DAEO.
The DAEO's permanent position description currently does not specifically include ethics duties.
The responses to Questions 2 and 5 are classified and will be shared with cleared OGE personnel upon request.
If the question is speaking to a separate critical element, one deputy ethics official has a separate critical element. However, a few employees have ethics duties as part of a broader critical element.
Questions # 6 & 7 The DAEO oversees the Commission's ethics program and supervises the ADAEO. However, the DAEO has no supervisory authority over regional offices staff, who serve as Deputy Ethics Counselors (DECs). The DECs are supposed to perform ethics duties for all Federal Advisory Committee (FACA) members (a/k/a Special Government Employees or "SGEs"). Please see the Commission's responses to question #22 about the challenges of overseeing the regional offices ethics program.
6. The DAEO supervises the ADAEO. One employee tracks SGE activities for 4 SGEs, but DAEO does not supervise that employee. 7-10. No other staff works on Ethics issues. Rely on IT staff for IT assistance with training programs and to implement Integrity.
Question 6: DAEO is not the supervisor of record for employees but has authority to assign and review performance of all ethics duties.
The ADAEO is CEQ's Chief of Staff which is an "Administratively Determined" salary. "GS-15" was selected because that was the drop-down option that fit best for Question#4. This year, the DAEO has begun training a junior attorney on CEQ staff to assist with WAG authorizations and exit briefings for ethics, so Question #6 reflects that.
#5 - supervisory authority over individuals inside the DC Metro area but not outside the DC metro area.
7. No elements of the ethics program have been delegated outside of the supervisory chain of the DAEO.
10. The Office of Ethics is the centralized and consolidated Ethics Office for the entire Department of Agriculture. All 20 employees within the USDA Office of Ethics, including the DAEO and ADAEO have ethics duties as a distinct element in their performance standards.
Q8. Did not include indirect support, such as IT, HR, etc.
7. The Ethics Program is solely managed by the agency's Office of General Counsel.
For question #7, the above checked items have been delegated The Office of the Inspector General with regards to their staff.
With regard to Question #6, the DAEO/ADAEO have supervisory authority over 24 OGC Ethics Division employees in Question #5.
6/7 DOJ has 32 attorneys serving as Deputy DAEOs in its Components, Bureaus and Divisions, and in most of its Offices. In addition to the DDAEOs, as the Departmental Ethics Office (DEO) in the Justice Management Division (JMD) oversees the Department-wide ethics program and provides direct advice to DOJ's senior leadership offices, to JMD and to certain smaller offices. DEO's programmatic functions include issuance of Department-wide guidance, providing ethics information, advice and counsel to DDAEOs, preparation of training materials for use or adaptation by DDAEOs, delivery of ethics training, ethics program reporting, overall management of online public financial disclosure in Integrity, and retention of ethics documents including Pledges and certain financial disclosure records.
Item #6. The Confidential program is decentralized to component agencies. The IG was delegated authority to

conduct its agency annual training.
Qs 6 and 7: The DAEO and ADAEO exercise technical supervision over all Army attorneys regarding ethics program issues even though they are not in the rating chain of most Army attorneys.
Q2: This total does not include 14,509 F/T seasonal employees Q6: in DO, direct supervisory chain, but components generally report to bureau chief counsel, subject to oversight by DAEO. Q8: No for most but IT support for two bureaus.
7. All attorneys on the Ethics Specialty Team (EST) hold written delegation as deputy ethics officials.
10) Ethics officials in OGC have specific ethics responsibilities. Some assistant deputy ethics officials have ethics-related job elements in their performance standards.
Q6. DAEO and ADAEO have supervisory authority over some HQ employees identified in Q5.
#10 At FCA, all supervisors (i.e. rating officials) at grade 42 and above have an ethics performance standard as a distinct element in their performance evaluations. Because the DAEO and one DEO are not rating officials, ethics is not a distinct element in their performance evaluation. However, their performance in administering the ethics program is evaluated under each performance measure.
10. All supervisory officials above a certain grade level have a distinct element in their performance plan for ethics. The DAEO and one DEO do not have a distinct element because they are not supervisors. However, their performance in administering the ethics program is evaluated under each performance standard in their evaluation.
#7 The GSA Ethics Officials are located in the Office of General Counsel (OGC), the Civilian Board of Contract Appeals (CBCA) and the Office of Inspector General (OIG). The DAEO, ADAEO and most of the ethics officials are located in OGC and report to supervisors in OGC. The Heads of the CBCA and OIG have supervisory authority over the ethics officials in their organizations.
Ethics Program Administrator.
10. Because the agency is so small, there is only 1 attorney with ethics as part of the job responsibility.
Question 3(g): The ADAEO is a career Senior Level (SL) employee. Question 4: The ADAEO has served as NASA's ADAEO since Jan. 2007, but was selected for the new Senior Level (SL) position of Agency Counsel for Ethics in April 2015. The time period in Q. 4 now reflects time served as ADAEO. Question 5: Goddard Space Flight Center in Greenbelt, MD was not counted as being in the D.C. Metro Area because Goddard is administratively separate from NASA's Washington, D.C. Headquarters. Question 6: The DAEO is located at Headquarters and has supervisory authority over all employees at NASA HQ performing ethics duties, who are the personnel indicated as being in the DC Metro area, except for 2 NASA OIG employees who do 2-10 hours of ethics a week. Question 7: Ethics program management is substantially delegated to local NASA legal offices with some program management functions retained at HQ.
6. The ADAEO, who manages the ethics program, does not have formal supervisory authority over the regional deputy ethics officials, but they report to the ADAEO for purposes of their ethics duties. The central office deputy ethics officers and the ADAEO are under the supervision of the DAEO. 10. It is in the position descriptions rather than the performance standards for 5 of the ethics officials. They are part of our senior staff and all senior staff (including the DAEO) have the same performance standards.
The Office of the General Counsel (OGC) runs the NEH ethics program and NEH has not delegated any elements of the ethics program outside the supervisory chain of the DAEO or ADAEO.
Question #2: The total number of employees with this agency is classified due to the intelligence mission.
Question #3 After Margery Lieber retired in March of 2014, Lori Ketcham was named the Acting DAEO. A permanent DAEO has not yet been selected.
Question 1: The number of employees is limited to the number of direct-hire employees. The NSC staff is also supported by a large number of detailees for whom our ethics program provides advice and counseling on a daily basis. Question 5: The number of employees who performed ethics duties in 2015 includes 2 detailees who successively filled the role of ethics counselor during the year both subsequently returned to their home agencies. A new ethics counsel has since been detailed.
#4: The Associate General Counsel has served in the ADAEO position for over 10 years with break in service. He retired from government service on 12/31/15. The new ADAEO is Bernice C. Ammon, Assistant General

Counsel #6: The DAEO/ADAEO do not have supervisory authority for employees who perform ethics program duties outside the DC Metro area.

OA requires all Office of General Counsel employees to have uniform elements in their appraisals, so there is not a specific ethics element in appraisals. However, ethics duties are specifically included under work objectives for the ADAEO and Deputy Ethics Officials and performance of those duties is addressed in the narrative in each person's appraisal.

In 2015, while the ADAEO was on maternity leave (3.5 months), one assistant general counsel filled in for the ADAEO full time. And, another employee was detailed to assist for one month full time. The assistant general counsel who covered the ethics program full time while the ADAEO was on maternity leave now supports the ethics program about 30% of the time. Also, there is a paralegal who supports the ethics program about 50% of the time. Both employees have ethics duties listed in their performance expectations.

Only Dave Shull did not have ethics as a distinct element in his performance standards, but he handled a very narrow ethics issue (gifts to the agency) that is a small part of his job prior to his retirement from ONDCP in 2015.

In reference to question 6, the DAEO has supervisory authority over the ADAEO, but not over deputy ethics officials who serve in OSC's regional offices.

Question #2 is classified so we entered 0.

#5 - OVP has one Ethics Counsel position staffed by detailees. Accordingly, the 31-40 hours per week figure reflects 3 detailees that rotated sequentially through those positions. Additionally, OVP has 2 lawyer positions in our Counsel's Office that work on ethics matters, which, due to personnel turnover during the year, were filled by 4 lawyers during 2015. #10 - OVP does not have written performance standards. Full-time Ethics Counsel detailees are detailed from their home agencies pursuant to MOU, which identify ethics duties as the primary scope of work for each detailee. In addition, while there are no written performance standards for the lawyers in OVP's Counsel Office, the Counsel and Deputy Counsel to the Vice President are responsible for providing ethics advice to OVP.

Answer to question #5 includes the DAEO and ADAEO.

10. Standard performance elements are in the performance plans but the ethics duties are in the position descriptions and are rated as part of the performance evaluation.

Question 5: The total number included (3) includes the DAEO, ADEAO and one ethics official. The DAEO has supervisory authority over the ADEAO and ethics official.

#6: There is one ethics official that does not report directly to the ADAEO/DAEO.

#3 DAEO Level is PCES 1 #4 ADAEO Level is APS 01.

Please note that as Excepted Service employees, we do not have a grade, so cannot select any valid answer for questions # 3 and 4. I have selected GS 14 and below.

13. Which additional resources are needed? Check all that apply. **Table 4**

Additional training opportunities.

An electronic ethics tracking system. An e-filing for 450 filers.

Resources for in-house and in-person training.

Internal policies or supplemental regulation to address SGE's outside activities.

Training for the DAEO and ADAEO.

More training from OGE.

16. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2015? Check all that apply. **Table 5**

Professional Development

In-person training/counselling.
Important ethics opinions & training docs are available to all staff on a shared computer drive.
We deputized an official in our Denver office to assist. We also revamped our training program for 2016 and beyond. Our goal is to have at least three people capable of handling all ethics matters-the DAEO, ADAEO, and deputy ethics officials. After a difficult transition year, we will also devote time to improve records management so that critical information is available to the DAEO and ADAEO at all times in case one or the other is unable to exercise his or her duties for an extended period of time. By training deputy ethics officials in another location (Denver), we also improve our resilience as an organization in a worst case scenario. Denver is our coop site,
During CY 2015, before joining the agency, DAEO attended several structured courses offered by OGE.
[S]uccession planning of DDAEO and hiring a paralegal to assist the ethics program.
Staff Training Program Management Assignments.
E-mail updates, working group meetings, and intranet.
Other tools include training, IEC meetings, DEC meetings, OGE and OGC Ethics seminars and webinars.
FOnline.
Meetings with DEO and other ethics officials to cross train, training on the FAR.
OPD classes information papers on various ethics topics AMC Legal Conference.
In addition to weekly calls, EST had a 3 day training meeting at VA Central Office in 2015.
Interagency Ethics Council.
Monthly IEC meetings.
Interagency Ethics Council, Office of Government Ethics Training.
Classroom Training provided and materials created by Ethics Staff.
Virtual NASA ethics officials' face-to-face meeting in October 2015 on 2 afternoons for all centers.
The Deputy DAEO provided one-on-one coaching and support to ethics staff prior to her retirement.
Monthly status meetings.
Developing a desk book with written processes and policies.
#16 - OVP maintains various records to promote continuity of operations and consistency in program.
Attend monthly ethics sessions conducted by the Interagency Ethics Council.
In March we held an ethics summit for professional development.

Programmatic Tools

[M]odels from other agencies.
Legal Division Quarterly Performance Reviews includes DAEO, ADAEO, and Director.
To further enhance cross-training opportunities and enhance succession planning, the Office of Ethics developed a set of six innovative teams 1) Financial Disclosure Programs, 2) Training Programs, 3) Advice and Counsel, 4) Policy and Processes, 5) Outreach, and 6) Internal Training/ Staff Professional Development. OE employees serve on two of these six teams to collaboratively develop best practices and further enhance employee skillsets to the maximum extent practicable.
Some components utilize shared email accounts that are dedicated to ethics questions for ethics officials'

awareness of issues.
State[’s] Magazine has monthly section for Ethics. TIPs of the Day are seen frequently upon startup of computer.
Quick reference guides, information papers, [and] on-line training modules.
Drafted template language to be used for common ethics questions.
We copy all internal ethics opinions to an ethics email box. We also have a WAG email box. The ethics team meets bi-weekly to discuss ethics issues.
Tracking systems and shared drives.

18. What did you assess? Check all that apply. **Table 6**

Continued audit procedures to ensure all confidential SGE forms are collected.
Prepared for and received an OGE inspection of our program.
278/450 processes.
Ethical environment of the organization and employee knowledge of available resources.
Resource allocation.
Regular staff meetings provide ongoing assessment of ethics program.
The DoD Inspector General reviewed Air Force compliance with Section 847 (post Gov't employment).
CoE staff assistance visits by Division Counsel to assess, in part, Ethics Program Execution.
Annual Ethics Training.
OMB Cir A-123 Control Audit.
Employee Travel, gift acceptance procedures, [and] interoffice tracking. Added training to public filers.

20. Does your agency provide ethics program services for any board, commission, or agency that is independent of your agency? **Table 7**

Pretrial Services Agency for the District of Columbia.
Defense Technical Information Center.
The Office of Ethics provides ethics program services for the Federal Crop Insurance Corporation (FCIC) and the Delta Regional Authority (DRA). Separately, the Office of the Inspector General (OIG) provides services to the Council of Inspectors General for Integrity and Efficiency (CIGIE).
Caribbean Fishery Management Council Gulf of Mexico Fishery Management Council Mid Atlantic Fishery Management Council New England Fishery Management Council Pacific Fishery Management Council South Atlantic Fishery Management Council Western Pacific Management Council Gulf Coast Ecosystem Restoration Council.
National Assessment Governing Board National Council on Disability.
United States Interagency Council on Homelessness.
FirstNet Board, prior to their hiring of an ethics official.
OPIC.
1) Office of the Inspector General, 2) Advisory Committee [and] 3) Sub-Saharan Africa Advisory Committee.
We also administer the ethics program for the Farm Credit System Insurance Corporation.
International Boundary Commission.
MCC Board of Directors.
Public Interest Declassification Board.
President's Committee on the Arts and Humanities (PCAH).
Social Security Advisory Board and The Federal Old-Age and Survivors Insurance Trust Funds.

21. Please list any significant accomplishments your ethics program achieved in 2015. **Table 8**

Signed up to participate in Integrity as pilot agency developed ethics brochure for public Board members (SGEs) conducted in-person ethics training for Board members and all new agency staff.
Filed all annual and semi-annual OGE reports timely (i.e., ethics questionnaire, DAEO and PAS 278s, ethics pledge, [and] travel report). Also, collected 100% of SGE financial disclosure forms for two regular plenary sessions (forms are required when an SGE attends a plenary session).
As with previous years, the staff and members consult with the DAEO/ADAEO before taking any action they believe could potentially raise an ethics issue, and follow the advice given.
In-person ethics training for all Washington, D.C.-based staff, including U.S. Government direct hire employees and contractors, and for newly hired personal services contractors at USADF field offices in Africa.
Transitioned to Integrity e-filing system for the majority of our 278 filers. In addition to providing live ethics training our financial disclosure filers, we also provided live ethics training to thousands of non-financial disclosure filers. Together with OGE's General Counsel, we briefed approximately 30 members of the Mexican Government's Secretariat of the Public Service on a wide range of topics related to ethics, unjust enrichment, and financial disclosure.
- 100% compliance with financial disclosure reports. - On-boarding of new DAEO. - Hatch Act training to Commission and all staff.
None really. Am working with OGE Desk Officer and Integrity staff to get our agency set up to use Integrity for the 2015 Public Disclosures.
100% on-time filing of all financial disclosure reports.
Updated Ethics Handbook Successfully [and] vetted new non-career SES, Executive Secretary/President of Foundation.
- The agency's confidential financial disclosure program attained a 99.8% annual training rate. - The agency's public financial disclosure attained a 100% annual training rate for PAS and SES personnel. - The ethics program provided a full hour of live training to its new Chief Executive Officer and to all Governing Board Members.
Transitioning to the use of the 278e.
No significant ethics issues. Managed a difficult transition as the incumbent DAEO went on indefinite leave in June and retired in December. Complete the process for four new nominees. Prepared a wholly revised training plan for 2016. Completed all required filings for public and confidential filers. Conducted in depth training of several hours for four incoming PAS public filers. Completed transition to integrity.gov. Monthly participation by OGC personnel in OGE ethics training webcasts Successful relationship with OGE Desk Officer (Kim Kaplan), who is very responsive and helpful, and with the OGE staff who cover for her when she's on leave, etc.
All reports were received in a timely manner.
The Commission's significant accomplishments for 2015 are relating to training. For the first time in years, if ever, ALL full-time employees (financial disclosure report filers, as well as non-filers) received ethics training in 2015. All full-time employees except for one attended live ethics training and the remaining employee completed online training. This included all career headquarters and regional staff, as well as Schedule C political employees. Furthermore, in 2015, five out of eight Commissioners attended specialized live comprehensive ethics training, that covered: <ul style="list-style-type: none"> • Criminal laws • 14 Ethical Principles • Standards of Conduct regulations • STOCK Act, and • Safe Harbor provisions
This is an improvement over 2014, when only three out of eight Commissioners attended live ethics training,

<p>even though it was offered twice. Also, two Commissioners completed online training. As a result, all Commission staff, except for one Commissioner completed ethics training.</p>
<p>On-time completion of filing financial disclosure reports.</p>
<p>For the first time, the Ethics Office traveled to each of the CFPB's four regional offices' all-hands meetings (California, Louisiana, Illinois, and Pennsylvania) to provide in-person annual ethics training. In 2015, the Ethics Office provided live training for 97% of its new employees during New Employee Orientation and for over 96% of its employees on the CFPB's Supplemental Ethics Regulations. For the second year in a row, the Ethics Office provided annual ethics training by individual office, through live and interactive training sessions focusing on real life scenarios, and found that over 98% of respondents believed their level of awareness of ethics issues increased as a result of the training.</p>
<p>Underwent and inspection of our ethics program and received a favorable result on OGE's Ethics Program Inspection Report.</p>
<p>Increased the amount of targeted ethics training.</p>
<p>Successful transition between DAEOs with superb continuity of operations and assistance for staff.</p>
<p>Prior to October 1, 2015, all ethics program services were provided by an external agency. On October 1, 2015, a DAEO and ADAEO were formally designated. Shortly thereafter, the DAEO met with OGE to discuss the status of the ethics program and planned efforts to improve the program. Since October 1, 2015, ethics program staff prepared and delivered comprehensive in-person annual ethics training to all agency financial reporters (and over 90% of all agency staff members - both employees and detailees), made significant strides towards centralizing ethics recordkeeping, prepared and finalized a comprehensive ethics reference guide for agency employees and distributed the same, and reevaluated the scope of the agency's confidential financial reporting program in preparation for the 2016 filing season.</p>
<p>Live training provided to CEQ staff. Completed program inspection with OGE, which led to improvements in overall ethics program.</p>
<p>[R]egistered all agency public filers in the Integrity system and filed all 2015 annual and periodic reports through Integrity. Created an online ethics training module. [I]ncreased percentage of timely submitted OGE Form 450's from 78% to 98%.</p>
<p>Targeted Post-Government Employment Training to Category Managers and Buyers.</p>
<p>[I]nitiating process to hire a paralegal for the ethics program [and] prepared for OGE inspection.</p>
<p>100% completion of filing and training requirement for all OGE 450 and OGE 278 filers.</p>
<p>Accomplished significant outreach in ethics training, including providing live, in-person training at locations outside of headquarters, created an email account exclusively for ethics issues that will improve record keeping of ethics opinions and intake of ethics questions, added additional personnel to assist with handling the administration of the ethics program, and produced numerous publications on ethics issues for the workforce.</p>
<p>Completed OGE Audit follow-up review [and] hired Ethics Program Manager.</p>
<p>1. Provided values-based ethics training to the majority of DLA employees. This includes those employees required to receive annual ethics training and those to which it is recommended. 2. Provided live ethics training for OCONUS locations throughout the Pacific AOR. 3. Created online New Employee Ethics Training for all employees. 4. Commander's memorandum distributed to PLFA business unit directors reinforcing the importance of and methods for confidential financial disclosure report filing.</p>
<p>Promulgated Board Operating Procedure OP-621 (Administering the Public and Confidential Financial Disclosure Systems), all employees received ethics training, [and] processed three nominees.</p>
<p>In 2015, we developed written guidance for DSS employees concerning various ethics-related topics including gifts, use of Government motor vehicles and rental vehicles, conflicts of interest, outside employment, and post-government employment. We updated our agency's ethics webpage to include useful and easy to understand ethics information for our employees. We also provided 2-hour in-person ethics briefings for all new agency employees.</p>
<p>100% Annual Ethics Training Completion on time.</p>
<p>All OGE 450s were timely filed and reviewed.</p>

Despite its small staff, under the leadership of USDA's General Counsel, who has championed this Office, and with the strong support of the Secretary of Agriculture and the Deputy Secretary, the Office of Ethics (OE) has had numerous significant accomplishments in 2015. These accomplishments include: (1) Energetically enhancing and expanding the USDA Ethics Program's reach outside of the Beltway to more effectively reach supervisors and employees across the nation. This was cost-effectively implemented by systematically utilizing video teleconferences, conference calls, webinars and, in some instances, large group in-person trainings. As a result, this year, for the first time, OE staff conducted over 62 hours of live large group trainings for USDA employees outside of the Washington, DC area. The DAEO and Alternate DAEO led by example and furthered this outreach by personally leading group separate large group ethics training for supervisors and employees across the country by long-distance webinar and in person large group training. The DAEO also led an innovative inter-active ethics training session for APHIS' foreign veterinarians and other USDA employees stationed around world. (2) The DAEO expanded his creation and use of Ethics "One-Pagers," a cost effective Office of Ethics innovation, which are distributed at the Secretary of Agriculture's Sub-Cabinet meetings, Agency Head's Meetings, and eight other weekly senior management meetings at USDA Headquarters. All told, the DAEO has personally presented over 400 "Ethics Moment" ethics mini-trainings in 2015. In addition, the Alternate DAEO provides initial ethics orientation training for all incoming USDA political appointees and ensures that all incoming appointees sign the Ethics Pledge on their first day at USDA. (3) The Office of Ethics developed innovative new ethics training materials on the Ethics rules for FSIS meat inspectors and GIPSA grain inspectors. These materials and the DAEO's Ethics "One-Pagers" were requested and are used by the international Organization for Security and Economic Cooperation in Europe to train over 2,000 food safety inspectors in Serbia. (4) The DAEO personally developed and led a four-hour Ethics and Hatch Act training session for the unique needs of the Forest Service's Job Corps Directors which was presented at their national conference. (5) Because USDA's most complex ethics issues involve scientists, the Office of Ethics created the first ever USDA Ethics and Science Conference. This innovative two-day (no cost) Ethics conference brought together senior ARS Associate Area Directors from around the country and enhanced collaboration and communications among scientists and Office of Ethics staff. Building on the conference's success, the Office of Ethics instituted quarterly Ethics conference calls between Ethics staff and ARS officials on the latest ethics issues involving scientists. In recognition of this high level of collaboration, the Secretary of Agriculture awarded the Office of Ethics the Department's highest award for excellence and achievement. (6) USDA's Office of Ethics has led the creation and dissemination of effective ethics rules for the Department's Fed Feed Families Program. The Office of Ethics developed a "One-Pager" on ethics rules for the Feeds Feed Families campaign. This one pager has been widely distributed throughout USDA and has also been shared with other Federal agencies. (7) The DAEO created Ethics training on the overlay of State Bar Ethics rules and Federal Post-Employment Rules for Federal attorneys leaving government. This training was presented at USDA and was presented at the U.S. Office of Government Ethics' Institute for Ethics in Government's Advanced Practitioner's Webinar Series. This webinar was recorded and is on OGE's YouTube page. (8) To address the effects of years of under investment and the lowest level of staffing in the Office of Ethics in eight years (a 45% decrease to 20 employees in 2015 from 36 in 2008), The DAEO and Alternate DAEO led an innovative process improvement: The creation of six new Office of Ethics staff "action teams" to enhance collaborative team building, cross-training, and foster greater innovation in an era of diminished resources. As a group, we created six "action teams" in the areas of: a) Financial Disclosure b) Ethics Training c) Ethics Advice d) Client Outreach, e) Policies and Procedures, and f) Internal Professional Development. As a result, every Office of Ethics employee serves on two committees of their choosing. (9) To assess the quality of ethics services Office of Ethics staff provided throughout the Department, we revamped the customer service surveys that are included in every e-mail sent by OE staff. These actions made the surveys more noticeable and increased customer service feedback from USDA employees. The changes led to more than a 200% increase in the number of surveys received in 2015 as compared to the same point in 2014 (293 versus 91). Survey feedback has been overwhelmingly positive (98% positive). (10) The Alternate DAEO has led the effort providing live ethics training to a number of USDA's

Federal Advisory Committees. These committees provide advice to the USDA Secretary on topics ranging from bio-technology, food safety, to encouraging new farmers and ranchers to sustain the nation's food supply. (11) OE has taken steps working with OGE to successfully implement Integrity, a new electronic financial disclosure reporting system created by OGE. (12) The DAEO worked to assist the Federal ethics community by delivering a presentation, sharing with the Inter-Agency Ethics Council, USDA's innovative educational ethics training tools. (13) Finally, the Office of Ethics continues to have one of the most successful mentoring programs for its ethics officials. The environment at the Office of Ethics is one where "each one, teaches one" from the DAEO and Alternate DAEO on down, everyone learns from everyone else to become better, more finely honed, ethics experts.

Continued expansion of training provided to employees in other agencies, and completed administrative process to implement full Department use of the INTEGRITY electronic filing system.

- Leader-led in-person ethics training based on valued-based decision making. - Continued emphasis on values based decision making within the Department. - Finalizing updated supplemental regulations in coordination with OGE. - Robust training program for ethics counselors department wide. - Monthly coordinating group meetings open to ECs across the Department enables exchange of ideas and coordination among peers.

Certified or initially reviewed 99% of 405 OGE Form 450 reports within the OGE 60 day standard.

Drafted standard operating procedures for a number of program areas.

Transitioned approximately 90% of all OGE 278 filers to Integrity system.

We continued to successfully utilize the HHS Electronic Financial Disclosure System (EFDS), which facilitated the submission, review, and certification of public and confidential financial forms electronically. We provided in-person IEO and AET for non-career personnel. The agency's 2015 AET was developed and launched. Ensured continued compliance with the STOCK Act requirements. Undertook initiative expanding training program beyond the ethics community.

Continuous process improvement: 1. DHS Supplemental Regulation on Outside Employment and Activities approved. 2. Identifying and maintaining lists of 450 Filers through cross-divisional collaboration. 3. LMS used as a training vehicle for 450 training. 4. Initiative to create an Ethics Office within the Office of Chief Counsel at Secret Service (legislative proposal). 5. HQ DAEO office conducted "assist visits" to review component program compliance.

The Ethics Division provided two mandatory ethics trainings for all HUD employees presents a tip of the month and displays it on the agency's intranet and initiated a robust and ambitious program review of the regional and bureau offices. HUD OIG implemented the Integrity & Compliance Program completed a survey of the workforce on Integrity & Compliance published monthly OLC Newsletter and published resources, training, advice, publications, and informational topic papers on SharePoint for easy on-demand agency use.

DOJ successfully launched online public financial disclosure in Integrity, the brand new system developed and launched by OGE. DOJ was the first and largest Cabinet-level agency to successfully utilize Integrity. This initiative required significant devotion of DOJ resources in 2015, including ethics officials' time and other programmatic resources. There were unanticipated difficulties in using the new system, for both DOJ's filers and reviewers. For example, many DOJ filers had considerable difficulty with Integrity's reliance on MAX.gov to log in. DOJ helped its users navigate MAX.gov so that filers were timely with their annual submission. By way of another example, DOJ's programmatic structure for review and certification of reports was not reflected in Integrity's development. However, DOJ developed alternate ways to have reports reviewed and certified in Integrity, allowing the appropriate officials in DOJ to have access to and certify reports.

-Continued ethics presentations at the senior management meeting. -Increased ethics support to regional offices. -Implemented a monthly electronic DOL ethics newsletter -Development of agency specific multi-part ethics training.

Completion of all PAS reports prior to end of the calendar year. Increased ethics training. Increased senior level management involvement with ethics program.

We were successful in completing our overall mission goals and requirements despite budgetary and manpower limitations.

The Army increased the number of ethics training options available to Army personnel, and improved

enforcement and tracking of the annual ethics training requirement, resulting in an increase of filers completing the annual training requirement from 95% last year to approximately 97% this year. Many organizations across the Army reported 100% ethics training completion for the first time for their filers. The Army also made ethics training available to more non-filers than ever before. Various Army commands implemented a variety of new ethics training programs, to include ethics training for senior leaders and their spouses conducting scenario based ethics training for new, existing, and transitioning personnel and implementing an on-line IEO module on the Office of The Judge Advocate General's website for Army wide use by new personnel. An AMC unit provided live ethics training via a VTC and telephone conference call to 378 filers around the globe.

Both the Navy and Marine Corps conduct assist visits for subordinate level ethics programs. Incorporated Navy Core Values into ethics training.

Treasury focused on achieving full compliance with ethics training and filing requirements for covered employees and providing live, in-person ethics training, where possible, including to many non-covered employees at many of the bureaus. Headquarters deployed a new ethics database for program management and administration, and many bureaus implemented program improvements and enhancements.

Implementation of Integrity for Public filers. Use of Ethics Plan to develop metrics for ethics program.

Began the review and update of the filing exemptions for SGEs on FACA Committees. Adopted the Integrity program for new filers and will use for all PFD filers in 2016. As part of the reorganization of VA's Office of General Counsel, the Ethics Specialty Team moved from a staff group in the Office of General Counsel, responding to an Assistant General Counsel, to a direct report to the General Counsel, with the DAEO reporting directly to General Counsel. EST is now an integral part of VA's Public-Private Partnership program. Updated agency-wide annual ethics training required for all employees.

Ethics Training for all employees.

- EPA worked with OGE to pilot test INTEGRITY in anticipation of the government-wide roll-out in CY 2016. We provided significant input into helping OGE develop and budget the system.
- Using zero contract dollars, we produced annual ethics training that, once again, received rave reviews throughout the agency. This year's course focused on "Fundraising," and was taken not only by the financial disclosure filers but also by 80% of all EPA employees.
- For the last year of collecting paper 278s, we collected, reviewed and certified all 420+ forms before the end of the fiscal year.
- Concerned about whether individuals on Intergovernmental Personnel Act (IPA) assignments were receiving adequate ethics counseling, we now require that all proposed IPAs throughout EPA be reviewed by the EPA ethics team. Each candidate must take IPA ethics training and, if necessary, EPA Ethics writes an ethics agreement. We review the resumes and financial assets of every IPA person coming into EPA.

Ensuring that new employees receive initial ethics orientation in a timely manner.

1) All Agency Annual Ethics Training Program. 2) All Agency Lapse (prohibited/permitted functions) Training Program. 3) Political Hatch Act Training Program.

1. A new DAEO was designated by the Chairman and two new DEOs were named. 2. We migrated all hard copy 278 reports to Integrity. 3. We have begun training a new DEO.

Implementation of in-house agency e-filing application for OGE Form 450 and FCC Form A-54A. In-person live training of all 278 Filers. Successful transfer of financial disclosure duties to replace of retiree that handled the position for over 30 years. Use of OGE Integrity e-filing system for review of small number of 278 Filers making use of the new application.

Working with OGE we transitioned all FDIC public filers to the OGE Integrity filing system.

Deputy Ethics Official completed a six month detail with the Election Assistance Commission. Developed a reconciliation process to resolve ethics training tracking difficulties. As a result, OGE closed the recommendation from its March 2015 ethics program inspection report.

In 2015, we launched a successful well-received ethics training presentation. Provided Ethics training to at least 1300 employees in our agency. We also addressed frequently asked questions via by e-mail or phone

during our Ethics training.
Incorporated individual voting clickers in annual ethics training to provide real-time feedback from employees re: understanding of ethics rules. After completion of the training season, data was downloaded to determine agency strengths and weaknesses.
Successful completion of OGE Program Inspection. First live annual ethics training presented by agency ethics staff. Updated financial disclosure policy.
- Successful transition to Integrity for filing of public financial disclosure report. - Accomplished 100% annual training participation for both public and confidential filers.
TRAINING ALL EMPLOYEES IN ADDITION TO REQUIRED TRAINING.
The agency began using the INTEGRITY financial disclosure system, with approximately 30 percent of public filers participating.
We reviewed approximately 1100 financial disclosure forms, trained 375 new employees, made a presentation before the Interagency Ethics Council, hired a new ethics paralegal, and assisted OGE and the White House with two Board nominees.
In April of 2015, OGC hired an attorney who is largely dedicated to ethics work, [who] has been an asset in handling the number of ethics opinions requested by our growing Agency. OGC also successfully administered annual ethics training to all Agency employees and new employee ethics training within 90 days of each new employee's arrival (in most cases within 30 days). OGC revamped new employee ethics training in 2015 and updated annual ethics training to make it more relatable to employees.
We launched Integrity for all of our senior staffers (the use of the new system was mandatory and greatly reduced our review and certification process). We hired a new deputy ethics official (after losing a team member). We launched a new live training program for senior staff "Ethics Family Feud" which was well received (FTC vs. Commission). We provided live annual ethics training for GS 14-15 employees throughout the calendar year for the first time (instead of focusing on the fall/early winter). We created a new online ethics annual training program "Ethics Dash" for GS 14 and 15 employees (we even handed out trophies of intrinsic value to our top contestants at our agency's holiday party). We used an electronic survey to confirm timely completion of new employee ethics orientation with our new hires.
Conducted a Pilot program, where we began the process to transition from a paper based manual public financial disclosure system to the Integrity.gov online filing system.
The Council was established as a new independent federal agency, including the institution of formal ethics policies and procedures.
We quickly and efficiently on-boarded all new employees as well as any interns. We provided training to all employees and completed our Financial Disclosure reports in a timely manner.
This year the ethics office has: (1) Implemented a more comprehensive outside activities form (2) Developed new internal guidance for SGEs, and (3) revised written ethics guidance for IMLS interns, fellows and volunteers.
All employees completed their financial disclosures in a timely basis. The vast majority of employees completed their ethics training in a timely basis.
Ethics training of 100% of personnel and 100% of financial disclosure filers, improved training, improved initial ethics training response for new hires and new entrants, improved filing system, [and] successful follow-up inspection by OGE in 2015.
Timely compliance by filers with annual financial disclosure report requirements.
Developed an online ethics training program using the eLMS system. Improved the intranet ethics page. Implemented Integrity for all public filers.
Worked hand in hand with our personnel servicing agency to streamline our ethics program.
Secured clearance of a new Presidential nominee. Drafted the Commission's first 208(b)(3) waiver.
We started a new policy requiring employees to gain prior approval for any outreach activities (i.e. trainings, speeches, etc.) and set up a separate email account to collect and respond to each request.
100% of Employees received Ethics Training.
Ensuring everyone is trained.

Elevation of ADAEO position to a career Senior Level (SL) appointment, reflecting the priority NASA places on its ethics program. Obtaining approval from OGE to continue using NASA's Ethics Program Tracking System (EPTS) and timely implementing 278e filing capabilities per OGE standards. Holding a virtual face-to-face NASA ethics conference with 95 participants over the 2-day session, which included an OGE guest speaker. First known direct telephonic ethics advice provided by a U.S. Government ethics official to an employee in outer space.
Successful introduction of Integrity for OGE 278 filing.
We did 12 remote ethics training sessions for our 5 regional offices for approximately 800 employees during our new computer rollout. We were able to provide this live training which we normally do in alternate years during our national conferences. 2015 was a non-conference year. We also made much progress on our transition to Integrity.
In 2015, our agency switched to using Integrity for our filers whose 278s are reviewed and certified by OGE. We will have all our 278 filers on Integrity in 2016.
During 2015 NEH completed annual ethics training for all NEH employees (not only those required to file financial disclosure reports). In 2015, NEH also began sending monthly ethics e-mails to all staff. NEH also conducted a bi-annual ethics survey which provided feedback from staff to enable us to strengthen the NEH ethics program the feedback was overwhelmingly positive. This was our second year using an electronic financial disclosure filing program, FDOonline, and this system simplified the process for filers and increased reviewer efficiency.
-strengthening our accountability processes for OGE form filers.
The NLRB Ethics Office continued to provide timely and interesting topics to Agency employees through the Agency newsletter, Job Aids, and Ethics Advisory memos. These topics included the Hatch Act and Upcoming Elections, Speaking Engagements, Gifts, Lawyer Rules of Professional Conduct, Seeking Employment, Post Employment Restrictions, Participation on a Non-Federal Board of Directors, and Fundraising Activities. All documents were distributed to headquarters and field offices via email and posted to our Ethics webpage. These documents were developed to educate Agency employees about potential ethical pitfalls that they may face as an employee of the NLRB. Our efforts in this area have been well received by NLRB leadership and by the rank-and-file employees. Moreover, employees have expressed their appreciation for how we have provided ethics information in a way that is quick to read and easy to understand. We expect to continue to use this method of training in 2016.
1. 100% compliance with ethics training requirement 2. Significant update to eFile system to include 278e.
Provided live training sessions to assist Public Financial Disclosure filers in properly completing their 278s.
Teamed with White House Counsel to develop and conduct annual ethics training for EOP personnel.
Live training for all agency employees Pilot program of electronic fillable forms for Payment of Travel Expenses from a Non-Federal Source and WAGs.
New position created: Ethics Program Assistant. Trained two new Deputy Ethics Counselors. Maintained administrative logs to track data. Improved user functionality of certain facets of the agency's ethics electronic Ethics Management filing system. Streamlined process for coordinating filer designations between the Office of General Counsel and the Office of the Chief Human Capital Officer. Improved certain facets of program management processes for special Government employees.
No significant accomplishments to note.
We successfully set up the Integrity e-filing system for our 278 filers. Ten of our 24 filers used the system to complete their CY 2015 278s. We were able to offer live or video-conferenced annual training for all our employees through the Department of Commerce for the second year.
Improved E-filings for 450's, outside employment online training, Hatch Act training, upgraded forms for outside employment and gifts, administered intern ethics training.
1 Instituted policies and procedures for WAGs and impartiality determinations 2 Require supervisors to discuss the importance of ethics to their business units with new employees within 30 days of on-boarding
1. Closed 16 OGE recommendations following plenary program review. 2. OMB Director personally and specifically acknowledged the progress and development of the OMB Ethics Program. 3. Built an online

clearance form for seeking ethics guidance in connection with event attendance. We have exceptionally high volume in this area (WAGs and 1353, among others types) and this was a huge renovation in terms of organizing the requests, providing consistent guidance with use of a template, and storing the guidance in a single location. 3. Developed post-government employment advice log and outside activities/employment approval log (pursuant to agency supplemental regulation). 4. Training nearly all employees in person, by Division, on all of the conflicts laws and standards. This has generated a tremendous amount of volume in terms of advice and counseling. 5. For the 2015 filing cycle (covering CY2014), we moved completely to Integrity, and did first nominee report in Integrity.

Put in place new procedures regarding collection and review of both public and confidential financial disclosure reports. Continued to provide high-quality ethics guidance to ONDCP staff.

We not only have emailed Ethics Training to all staff several times during the year, but we also had a required Ethics Webinar that everyone was required to attend.

Successful OGE program review.

The agency's ethics team created user-friendly cheat sheets for staff to understand commonly encountered ethics issues in plain language.

(1) Financial disclosure filers complied with all OGE deadlines for submission of reports. (2) Provided timely and accurate advice to management and staff.

Sponsored two training events for Intelligence Community ethics attorneys led by the Office of Government Ethics on topics including gifts, outside activities, teaching, speaking, and writing and attended by over 40 ethics officials from approximately 7 agencies. Added ethics questions suggested by OGE for agencies to add to employee surveys which determined that 96% of respondents at ODNI know of the ethics rules and 92% know where to find an ethics official. Began small pilot of an electronic filing system for financial disclosure reports of senior employees

Successfully transitioned in a new DAEO, a new ADEO, and two deputy ethics officers while maintaining continuity of the program and providing timely, accurate ethics guidance. Also drafted detailed, individualized financial disclosure counseling memos for each of the office's 278 and 450 filers.

Our program was successfully reviewed by OGE.

This year our most significant accomplishment was implementing an official certification process with each of our overseas offices (approximately 60 offices) to verify all new Personal Service Contractors (PSCs) hired overseas by our Agency were reviewing the Standards of Ethical Conduct for Employees of the Executive Branch (Standards) within their first 90 days. This year through that new certification process we verified 431 PSCs were given at least one hour to review the Standards, provided the contact information for all Peace Corps ethics officials, and they were given summaries of the key ethics rules. Furthermore, in September 2015, we had the opportunity to present live training to several of our overseas Country Directors, Host Country National leaders, and Volunteer Recruitment & Selection (VRS)/Regional Official Managers at the Global Leadership Summit held in Shepherdstown, West Virginia. The live training was a mandatory 90 minute training session which discussed ethical dilemmas encountered by Peace Corps employees around the globe. The live session allowed Agency Leaders, who are the keystone for ensuring the integrity of our agency's ethical culture, to reinforce their knowledge of the ethical principles which they must adhere to and role model in our overseas and Regional offices. We also were able to present fun live training to the Africa Region Directors of Management Operations (DMO) for the first time recently at their Annual DMO conference. We revamped an available ethics training game, "Who Wants to be a Millionaire" by creating new categories and questions specifically for our DMOs. We were able to present live training to most of our Inter-America and the Pacific Region DMOs and most of our Directors of Programming and Training as well this year at their annual conferences.

1. Created annual ethics training and conducted in-person training for 333 employees (94% training rate) 2. Issued Hatch Act Advisory 3. Updated New Employee Ethics Training materials - 99% of new employees timely trained 4. Conversion of all 278 filers to Integrity from old electronic filing system, including "pre-population" of previous year filing.

In-person ethics training for all PRC employees Distribution of a monthly ethics dispatch for continuing

education Active ethics oversight over CFC related events Establishment of formal exit interview ethics briefing for departing employees.
Re-invigorated the ethics affirmation for Trust Board members.
100% Ethics Training Compliance.
Despite staff changes in the Office of General Counsel and certain time consuming projects, we completed all required ethics training timely and conducted ethics training for new field office managers.
We achieved 100% agency wide compliance with ethics training on our supplemental ethics regs.
Transitioned to Integrity.
Nothing out of the ordinary.
Provided ethics training nationwide to managers in our Operations component, our largest client. Provided in-person training to new agency employees nationwide. Provided customized ethics training to one of our regional management teams. Regularly briefed senior management during executive staff meetings. Provided agency-wide written Hatch Act and financial disclosure reminders/guidance. Created a professional responsibility workgroup. These activities have created greater awareness of ethical obligations.
-Timely completion of 450 Financial Disclosure Reports. -Successful Annual Ethics Training using different multi media.
1. Drafted written procedures for coordination between the Board's Office of Human Resources and the Board's Ethics Office. 2. Updated New Employee Orientation Materials. 3. Began preparation to move 278 filers to Integrity.gov.
1) TVA held its second annual Ethics Week in September 2015. 2) OGE completed its follow up review of TVA's Ethics Program and determined TVA successfully addressed the recommendations included in OGE's March 2015 inspection report. 3) Developed an annual ethics violation report for internal use. 4) Implemented a formal process for HR to report ethics violations to TVA's Ethics Program. 5) Created an annual editorial calendar for monthly ethics messages to workforce, managers/supervisors, and TVA officers.
Highly successful in person training conducted for those required to take annual ethics training. Transitioned DAEO filer to Integrity for 2016. Positive feedback from OGE after OGE Ethics Program Inspection.
Updates to FDS. Successful Plenary Review by OGE. Implementation of 'Your Smart Business Moments' initiative.
In 2015 the Office of General Counsel continued to provide in-person live annual ethics training to all federal employees. The training included interactive exercises and received positive responses from Agency employees.
Got all training and forms on time.
Annual Ethics Training was provided to the entire White House.

22 Please list the greatest challenges facing your ethics program in the short term (next 1-3 years). **Table 9**

Remaining vigilant for potential ethics/conflicts issues presented by outside activities of public Board members (SGEs).
Continuing to manage an unwieldy SGE financial disclosure program where the number of financial disclosure forms required varies based on the number of plenary sessions held in a given year and the number of plenary sessions attended by each SGE. Another challenge is ensuring compliance with 278T requirements since filers aren't always aware of reportable activity (i.e., they don't regularly check their statements, with their financial advisers or with their spouses).
There are no critical challenges. As in years past, the continuing challenge relates to the difficulties of running an ethics program where, due to limited staffing in the agency, the DAEO and ADAEO are the only ones carrying out ethics functions and can only do so as one of many secondary duties of their jobs.
Finding cost-effective ways to raise and reinforce ethics awareness among staff.
Transitioning our remaining paper 278 filers to Integrity. Continuing to improve our systems for tracking our employees' ethics training, and financial disclosure filings. Working to ensure a smooth transition for current

and future employees as a result of the upcoming election.
The DAEO, who originally planned to retire in December 2015, did put off retirement indefinitely. This person is eligible to retire and may do so in the next 2-3 years. The greatest challenge would be hiring a new attorney and training them for the job which would include ethics training.
AFRH has a facility in Gulfport, MS. The Administrator of that facility has retired and there has been a lot of employee turnover in the last year.
Assuring deadlines and compliance with any administration changes and OGE developments.
- Ensuring a strong culture of ethical behavior in a climate of declining budgets and official resources. - Adjusting to loss of key ethics personnel and internal reorganization. - Transitioning Public Financial Disclosure filers to OGE's Integrity System.
Transitioning to the 278e
The CSB is striving to increase training and improve the overall program with no increase in resources.
-Hiring new personnel -Training of 21 unpaid Commission Members spread throughout the country.
The ethics program faces major short term challenges related to (1) Transition and Leadership Changes, (2) Commissioners' Use of Title, Position, and Agency Letterhead, and (3) Regional Office Ethics Programs. These challenges are discussed in more detail immediately below in the ADDITIONAL COMMENTS section.
Having only five full-time staff on the entire Commission with 12 Commissioners and managing to implement an ethics program.
Implementing Integrity system.
One of the challenges facing our ethics program in the next year will be finalizing and implementing our agency's revised ethics regulations. Another challenge will be to train all of the CFPB's public financial disclosure filers on the new Integrity system.
Implementation of OGE's Integrity financial disclosure program.
Transition to the next administration and continuity within the ethics program. The DAEO will retire December 31, 2016.
Transition between Presidential Administrations and continuity of DAEO/ADAEO and ethics program during this time.
The most significant change to the ethics program from a broader staff perspective is the substantial increase in the number of confidential financial disclosure filers. Many employees who will be submitting a confidential financial disclosure report with the agency in 2016 have never done so before. It is anticipated that this transition will give rise to many concerns and questions, but will be an excellent opportunity to engage with agency staff on ethics awareness. Ethics program staff will continue to improve recordkeeping and the timeliness of complying with various requirements.
CEQ is a small agency with high turnover and does not have a dedicated full-time employee for the ethics program. CEQ is preparing for the Presidential transition.
Staff available to handle ethics request especially around OGE Form 450 filing season. the ADAEO who has Ethics as a distinct element of their performance standards also has other primary functions to perform.
Continuing to engage with employees world-wide and ensure they engage with the ethics advisors on a routine basis.
Temporary (less than 120 days) promotions to filing positions paralegal support.
Identifying new entrant OGE 450 filers.
Creating an effective SOPs hiring additional support personnel and updating the General Counsel's Ethics website and processes for outreach.
Adequate manpower and technical support to meet increased requirements.
1. Engaging supervisors in a continuous evaluation of job duties to ensure employees covered under 5 CFR 2634.904 fulfill their filing requirements. 2. Personnel turnover due to retirements, reassignments and downsizing of the Federal Government continues to challenge the Agency.
Amount of work required to support nominations of political appointees, staff departures.
DSS expects to grow in size over the next few years. As a result, we may experience challenges making sure

that we have sufficient resources to effectively manage the agency's ethics program.

Transition from Financial Disclosure Management System (FDM) to Integrity. Adding new filers due to transition of Joint Improvised-Threat Defeat Office (JIDO) under DTRA.

Application of 18 USC 208 to Commissioners (SGEs).

Among the most daunting challenges facing USDA's Ethics Program in the short term are issues related to the 2016 Presidential Election season and the Presidential Transition in 2016-2017. USDA's Ethics Program is very small -- with 20 FTE employees in December, 2015 (a 45% reduction in staffing, compared to the 36 FTE employees USDA's Ethics Program had during the 2009 Presidential Transition). To better illustrate the diminutive size of USDA's Ethics Program, USDA has only one Ethics Specialist for every 5,200 employees. With its resources so thinly stretched, USDA's Ethics Program will need to successfully manage three simultaneous, challenges: (1) Providing extensive ethics advice, training and timely financial disclosure reviews for all incoming appointees in the new Administration (2) Providing extensive ethics post-Federal employment advice and training to all departing appointees and retiring career employees and (3) Responding to the heightened demand for timely and extensive Hatch Act guidance and training for all USDA employees to ensure compliance with the rules limiting political activities for Federal employees during the 2016 Presidential, and 2016 and 2018 Congressional, State and local election seasons. With regard to providing ethics services for incoming appointees in a new Administration, OE will need to successfully conduct hundreds of new complex and time-sensitive Public Financial Disclosure Report (OGE-278e) reviews. USDA will be implementing OGE's Integrity system for all new entering appointees and career- SES and will need to provide extensive training and assistance to new OGE-278e filers. OE will also need to prepare necessary recusal documents, Ethics Agreements and -- for Senate-Confirmed Presidential Nominees (PAS) -- OE will need to conduct the necessary time-sensitive coordination with potential nominees, White House Counsel's Office, and the U.S. Office of Government Ethics, as well as ensuring timely 90-day follow up compliance reporting to OGE for all of USDA's incoming Senate-Confirmed Presidential Appointees. At the same time that USDA's Ethics Office will be working diligently on time-sensitive ethics issues related PAS nominations processing, the Office of Ethics will also be conducting ethics reviews for all incoming senior policy-making officials and other political appointees to USDA, including nearly 100 incoming senior policy-making political appointees serving in senior level positions (as FSA State Executive Directors and RD State Directors) within the 50 States. USDA is unique in that this Department has two senior political appointees in virtually every one of the 50 States, and these senior appointees all have backgrounds in farming and agriculture which necessitates extensive conflict avoidance vetting protocols. Simultaneously, the Office of Ethics' workload will increase dramatically with the need to provide ethics training and time-sensitive job search ethics counseling and post-employment ethics counseling to USDA's departing political appointees in Washington, DC and across the country, as well as retiring career-SES executives, GS-15 and GS-14 managers, procurement officials, IT technology systems experts, loan officers, grant-making officials, risk management insurance reviewers, appraisers, food safety inspectors, nutritionists, forest rangers, conservationists, researchers, scientists, veterinarians, and economists. During the 2016 Presidential and the 2016 and 2018 Congressional elections cycles, the Office of Ethics will be heavily tasked to provide timely Hatch Act advice and training for all USDA employees to minimize risks of political activity violations. As noted above, the Office of Ethics will be taxed to successfully navigate all three of these challenges because of its very small staff size and because the Office of Ethics must also allocate its scant resources to continuing to conduct the regular training and advice-giving provided to all 100,000 USDA career staff and numerous USDA Advisory Committees throughout the Department. Moreover, as a result of the long-term effects of staffing reductions and budget constraints, OE's small but dedicated and innovative staff will need to maintain the high level of quality and excellent customer service provided to all employees at one of the largest Departments in the Executive Branch. Finally, because USDA's Ethics Program is so small, it will need to face the challenge of retaining experienced ethics staff, a daunting problem because we have no "backbench." These problems are exacerbated and compounded by the fact that for the past several years, the DAEO, Alternate DAEO, and other Office of Ethics staff have been required to spend several hundreds of hours of time to assist and work with a substandard and lethargic human resources servicing office. Due to these challenges, USDA' Ethics Program is at risk of becoming a top

notch “finishing school” – successfully mentoring and training its staff to achieve very high levels of expertise where they can obtain higher paid ethics positions at other Executive Branch agencies.
Completing full implementation of the INTEGRITY electronic filing system, and conducting staff and employee training on use of the new system. Completing transition to new leadership within the Ethics Division. Ensuring a smooth transition from the current political employees departing and new ones entering the Department as a result of the Presidential election.
- Budgetary constraints, hiring freezes and/or reductions in staff, personnel turnover, migration to Integrity for public filers. - Ensuring adequate staffing and training for presidential transition.
We are always looking for effective ways to ensure employees hear what we are saying.
Complexity of financial investments held by senior leadership.
Retaining and recruiting qualified ethics staff continues to represent a major challenge for the HHS ethics community.
1. Transitioning to website for use by employees for information and forms. 2. Transitioning 450 and 278 filers to electronic systems. 3. Implementing the DHS Supplemental Regulation on Outside Employment and Activities.
Upcoming transition due to the Presidential changes. HUD OIG lists smooth implemented of electronic 450 filing system.
Transition of leadership. Succession planning: continuity of ethics programs with departure/retirement of senior ethics officials. Maximizing ethics program effectiveness with limited resources and increasing requirements. The continued increase in ethics programmatic requirements, including reporting, coupled with the increasing number and complexity of ethics issues that arise strain already limited ethics program resources. Obtaining and maximizing technology support. SGE/FACA identification, ethics training and financial disclosure.
-The next presidential transition. -Increased use of DOL electronic and social media to provide ethics advice/guidance. -Continued roll out of the OGE Integrity system/OGE 278e. -Post employment training for increasing number of termination personnel.
Rotation of ethics attorneys to other L offices. Upcoming Presidential Administration Transition. Managing the FDM and Integrity online filing programs.
Short-term/Long-term budget and manpower challenges, especially in light of the upcoming change in Administration.
Providing high quality ethics support and training despite the high turnover rate of both ECs and Army personnel. DoD has a much higher turnover rate than other Federal agencies. Ensuring Army ethics counselors are trained to perform their ethics program responsibilities, and ensuring Army personnel in general receive both initial and annual ethics training remains an ongoing challenge. Because of personnel and budget challenges, to include a shortage of administrative support, many Army organizations are severely challenged in managing their command ethics programs and meeting annual ethics training and financial disclosure report requirements. Regarding the Army’s Executive Agent oversight of FDM, if DoD transitions from FDM to Integrity.gov for all DoD OGE 278 filers, challenges will include: 1) ensuring the ability to transfer all OGE 278 data to Integrity.gov, 2) properly training OGE 278 filers and support staff on using Integrity.gov without the support of a robust helpdesk.
Review of complex instruments on financial disclosure forms Converting all 278 filers to electronic filing Ensuring part time ethics officials have sufficient training Maintenance of continuity when there is staff turnover in the program.
--Managing the Presidential transition period, given the large turnover of employees. --Fully transitioning to Integrity and employing other technologies to successfully manage the ethics program.
Presidential transition, Increased use of technology to support aspects of Ethics program.
Strengthening the government ethics oversight of the Veterans Health Administration Research and Development program.
<ul style="list-style-type: none"> • In June 2017, a stalwart member of our small ethics team will retire. He represents one-third of the total FTE, but is an expert in many facets: training, SGEs, financial instruments, INTEGRITY, strategic

planning. We will have to find a way to shore up our expertise and customer service with his departure.

- CY 2016 brings many additional challenges to a small group of FTE: presidential election, rolling out INTEGRITY to 420+ filers, an OGE program review (for the first time in ten years) and implementing several ethics regulations currently “in the works” at OGE.
- We continue to observe an increase in the number of complex ethics issues raised by employees and ethics officials. We also have seen an increase in the number of FOIAs to be answered by EPA Ethics.
- From a technology standpoint, EPA is moving away from a particular platform to a web-based environment which is creating accessibility challenges. We need to be able to figure out new solutions for organizing

Ensuring that new entrants file timely confidential financial disclosure reports.

1) Adapting to the new Integrity (278) Financial Disclosure Program 2) Incoming and Separating Political Appointees.

1. Training employees on the use of Integrity. 2. Training new DEO. 3. Providing one-on-one ethics training to a new expected Board Member.

1. Training employees on the use of Integrity. 2. Training new DEO. 3. Providing one-on-one training to a new expected Board member.

Continuation of success planning.

Continuing downsizing activities.

Assisting employees with the process of converting to Integrity. Developing a succession plan for the Ethics Program.

Our greatest challenge is transitioning to electronic filing and review of financial disclosure forms.

- Implementation and education of Integrity online filing system. - High volume of 278 filers.

- The Commission's former ADAEO, who had a long ethics experience, retired in October 2015. The Commission's DAEO and its newly appointed ADAEO discuss frequently to ensure the running of the Commission's ethics program without any interruption.

KEEPING EMPLOYEE INTEREST IN TRAINING AND PRINCIPLES.

Tracking outside activities of employees in satellite offices.

The greatest challenges will be implementing the new electronic filing system, Integrity.gov, and training our new ethics paralegal.

OGC's training efforts have been effective in encouraging employees to bring ethics questions to OGC, and sometimes we must give ethics opinions that are not what employees are hoping to hear. OGC's challenge is to avoid the potential chilling effect that could result from those opinions. OGC is also challenged to continue to grow our ethics program, such as by increasing proactive and targeted trainings, under the constraints of limited resources. Looking ahead to next year, the Presidential transition will likely result in new nominees to serve on the Agency's Board and OGC will take on the added responsibility of the nomination and confirmation process.

Managing competing priorities with a small staff continues to be challenging. No ethics team member is solely dedicated to federal ethics concerns. We continue to face challenges (monetary and otherwise) to adopt new procedures. We are still attempting to launch an electronic tracking system (to ensure timely notification of new hires, promotions, and other actions that trigger ethics-related requirements). We would like to acquire a free or low cost option for e-filing for 450 reports (we wish Integrity could be used for this purpose). We would like to have a more systematic approach of identifying potential conflicts of interest (e.g., develop a searchable, electronic database that allows program staff to efficiently identify involved/affected persons and entities). We also strive to ensure that all future employees have a full understanding of potential conflicts concerns (preferably before an offer is made and definitely before an offer is accepted).

The lack of a confidential financial disclosure electronic repository system. Also, while the laws/regulations do not change, it is a challenge to continue to develop fresh and engaging training each year.

The Council is a new independent agency with a small all-career staff (currently 15FTEs), ethics issues are limited and manageable at this time.

Devoting enough time to ethics in spite of the small size and constrained resources of our agency.
Training and transitioning IMLS public financial disclosure filers from the FDonline system into the new OGE Integrity on-line system. Also preparing agency ethics officials for the upcoming presidential election season which involves processing and training newly appointed agency board members.
Maintaining commitment to ethics.
Employee turnover--separations and retirements.
Providing relevant ethics training to staff.
Anticipated retirement of the ADAEO.
As always, our micro agency staff status - 3 FTE's and 1 PTE - and regular daily workload limits the time for the ethics program.
Developing new training materials.
A smooth transition in the use of Integrity.
Employee Turnover.
Only one truly knowledgeable person [and] turnover of Board of Trustees (required to file OGE 450 annually).
Heightened engagement with new companies with less developed compliance practices, and new opportunities for agency staff to seek private sector employment. This also includes heightened interest in agreements with commercial entities for which exposures to endorsement and related concerns, such as use of the NASA insignia, must be addressed. Responding to transition period demands. Ensuring field ethics attorneys remain fully engaged with the broader Federal ethics community in an era of less travel for training and meeting and more virtual communications. Managing the time required to manage the ethics program and provide ethics advice as the complexity of substantive and programmatic requirements increases.
Hatch Act, addressing the increasing number of OGE 450 filers and questions about whom should file.
Implementing the new Integrity System for our public filers [and] communication and ongoing compliance with remote staff.
One of the greatest challenges facing our ethics program is resources. The ethics practice is a significant part of our small office's workload and a bigger component of the workload for the DAEO and ADAEO. The challenge in the future will be balancing the ethics practice with the 18 other areas of law that our office handles on a regular basis. However, Integrity has helped streamline some of the financial disclosure work, which has been very helpful.
An ongoing challenge is balancing the ethics program with other demands of an OGC with a small staff. In 2016 two NEH employees will begin filing with Integrity (we had originally thought they would begin using Integrity in 2015).
-[M]aintaining relevancy to the workforce. -[E]ncouraging engaged participation in in-resident training.
Due to the directive from Agency Leadership to require all staff to receive approval from the Ethics Office for outside employment activities that involve participation on a Board of Directors, we have experienced a very significant increase in our workload. At the same time, the Agency's Deputy DAEO recently retired. We hope to have a budget that will allow us to hire and train additional ethics staff in 2016. Without additional staff it will be very difficult to keep up with our high standards of providing customized, timely, and comprehensive ethics guidance to all Agency employees. We will continue to support public financial disclosure filers as they become acquainted with using OGE's Integrity filing system. Supporting some filers who are not as technically inclined does require additional effort on our part but we feel that there will be time savings on the review of the annual and periodic reports going forward.
[W]orking with OGE re: implementation of Integrity.
Need line budget.
Implementing an automated financial disclosure system.
Turnover of detailees assigned to ethics counsel creates minor challenges regarding program continuity. These are alleviated to great extent by written guidance and job aids.
Improve overall program/process Issuing Supplemental Ethics Regulation.
Increasing number of employees requiring post-employment advice. Increased workload due to use of two

electronic filing systems (Integrity plus NRC's Ethics Management system for 450 filers.).
No significant challenges to note.
To continue to have funding to offer annual training to all our employees through the Department of Commerce.
Developing annual training and interesting training. Complete ethics training earlier in the year due to the 2017 Presidential transition.
1) Possible change in agency head; [and] 2) Presidential transition.
We have a tremendous amount of volume and it is very difficult to keep up. It is very hard to secure human resources to assist, whether in the form of detailees or a permanent hire. Also, due to the nature of the work of our employees, which is extremely diverse in terms of subject matter, analyzing conflicts is very time-consuming as it requires careful analysis each time. So, we need to make sure we spend the necessary time going through the issues and do not rush. This sometimes makes it hard for us to respond to other matters as quickly as expected by our clients and our leadership.
Transition to a new Administration.
I don't see any challenges.
Ensuring effective utilization of new OGE 278e and Integrity filing system where applicable.
With growth of agency staff, the ethics program's duties continue to expand. To address increasing ethics needs within the agency, the agency has sought additional support from fellows and detailees. The influx of new staff has increased the financial disclosure burden on the ethics team as reviewers of these reports, and increased the number of conflicts of interest held.
(1) Limited ability to perform proactive tasks because ADAEO has very diverse portfolio and DAEO serves as General Counsel having competing demands. (2) Transition to electronic records management system.
Agency has recently had its tenth anniversary. With this milestone and a presidential transition ahead, ODNI expects turnover of senior employees requiring substantial resources to be devoted to post-government employment counseling, nominee financial disclosure, and basic ethics training for new senior government employees. Resources to move confidential financial disclosure filers to an electronic system.
Because our Ethics Counsel are six-month detailees, we face continuous turnover in those positions. Locating qualified detailees for those positions remains a challenge. Additionally, the detailees lack of historical knowledge can pose some challenges.
Staying abreast of changes in ethics regulations and related matters.
- Locating resources to develop more comprehensive and engaging online training modules. - Developing more innovative training resources to address the unique nature of work performed by staff at the Peace Corps.
1. Training new attorneys 2. Succession planning 3. Increased role of Special Government Employees in PBGC matters 4. Transition to new Presidential administration 5. Continually finding new ways to train employees.
Updating supplemental ethics regulations.
The DAEO and ADAEO are new to their positions and the former DAEO was involved in a serious accident and he is no longer available for mentoring.
The PCLOB is a relatively new agency. We face challenges generally related to the maturation of a fledgling agency.
The possible retirement of our current Ethics Officials and training new Ethics Officials.
[K]eeping up with workload, implementing electronic filing of financial disclosures.
Utilizing Integrity.
Obtaining Agency funding or resources required to effectively launch and administer computerized Agency-wide initial ethics orientation and annual ethics training with an automatic tracking system.
Ensuring all agency employees are aware of the ethics regulations and resources. Receiving prompt notification from HR regarding new employees, new positions or retirements. Increasing interaction between the ethics program, labor and employment relations.
The possibility of switching to Integrity could take significant time and resources. As a temporary agency it

would be difficult to make a smooth transition.
1. Implementing Integrity.gov with Public filers. 2. Preparing comprehensive written procedures for ethics office. 3. Preparing a successor for the DAEO.
Implementation and transition to the new INTEGRITY e-filing system. Implementation and transition from OGE Form 278 to OGE Form 278e.
Integrity roll-out for all public financial disclosure filers. Manning due to 6 month detail and extended leave of ethics officials.
Interaction with Integrity System.
Challenges are those of a small agency, namely high demand in terms of requirements as compared to a limited number of staff.
SGEs not understanding the role of the DAEO and importance of the ethics rules.
Planning for the Presidential Transition.

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. **Table 10**

With regard to question 19, written policies were not in place in CY 2015. All applicable written policies are now in place.
For this filing year, CEQ will begin using Integrity for all of our financial disclosure filers to improve timeliness and to ensure that the appropriate forms are filed (public v. confidential).
Thanks to the OGE Audit Team for the coordination, professionalism, and practical recommendations for program improvements.
15. The General Counsel (DAEO) meets with the agency head bi-weekly. Ethics issues are sometimes discussed during these meetings. 17. OGC conducts ongoing assessment of the Ethics Program in biweekly DAEO meetings. The meetings are attended by the DAEO, ADAEO, Ethics Program Manager, Ethics Program Administrator, and Senior Associate General Counsel of the Employment Law Division. 19. DoD IG written policies are contained in DoD 5500.7R, Joint Ethics Regulation.
11. Other: Developing information technology applications for any aspect of the ethics program, and maintenance of the intranet web page. 16. Programmatic tools: Other tools include use of internal websites to dispense up-to-date ethics information, informational brochures, and HHS/OGC and OGE reference materials and training. 18. Other: To identify best practices or deficiencies, opportunities for improvement, and internal training systems and resources.
11. (cont'd) e.g. Bar rules, contractor issues, joint collaboration with nonfederal entities, speaking requests 21. Under expedited timeframes throughout 2015, DOJ worked extensively with OGE developers and contractors to help identify and develop solutions for Integrity difficulties, such that the vast majority of the Department's annual public filers, which numbered in excess of 1,800, were able to successfully submit their financial disclosure reports in Integrity. DOJ provides live, in-person verbal annual ethics training to all public financial disclosure filers every calendar year. Confidential financial disclosure filers receive their annual ethics training live and in-person every third year, with web-based or other training methods used in the interim two years. 2015 was a "live" training year in DOJ. With minimal exceptions, DOJ delivered live, in-person or verbal annual ethics training to the Department's nearly 80,000 confidential and public filers (cont'd at end)...
Q 21 (cont.): The Army also made on-line AET more widely available to non-filers, significantly increasing the number of Army employees who received annual ethics training in 2015. Within the CoE, several organizations initiated monthly or quarterly ethics newsletters or articles in organization newsletters. CoE ethics counselors also conducted ethics training for the first time at the Lockmasters Annual Meeting. The CoE also met the challenge of providing ethics support to its far flung jurisdictions. E.g., one CoE division successfully provided ethics support to 40 offices in 11 countries, while other districts supported multiple field offices. To improve its ethics training program, the CoE conducted multiple in-person classes at both district headquarters and field locations. It also implemented customer surveys in 2015. Within AMC, the Command

Counsel addressed ethics issues in his monthly newsletter to all AMC attorneys. Additionally, most AMC attorneys attended the AMC.
Q12: Generally, no, but two bureaus identified the need for more technology resources to manage ethics program requirements.
11. VA does not require advance approval of outside activities however, the Ethics Specialty Team does review and counsel employees on the government ethics aspects of outside activities. Employees are generally advised by their supervisors to contact EST for guidance on outside activities.
#19 - We currently refer to our Agency's regulations and OGE guidance regarding financial disclosures, however we are in the process of creating Policies and Procedures.
Question 19: We have no confidential filers.
Question 16: The exchange of best practices sharing at the NASA annual legal meeting and the local practice group meetings.
Question 19: NCPC has no written ethics policies in place.
Q.20. Q.20. Through an interagency agreement with the National Endowment for the Arts, NEH provides administrative support, including ethics program services, for two employees of the President's Committee on the Arts and Humanities (PCAH). Please note that NEH does not provide ethics program services directly to the PCAH as an organization, but only individual ethics advice to the two PCAH staff members who are NEH employees.
Question 15: the Agency Head met with the incumbent ethics counselor to discuss the program, among other things, in late December 2015, prior to the incumbent's detail to NSC.
#13: Technology needs: If OGE's Integrity system included confidential financial disclosure filings (OGE-450 & OGE-450A), the technology issues would be solved. #19: NRC utilizes OGE's guidance on financial disclosure reviews.
#15: Because we are a small agency, we do not have formal meetings to discuss our ethics program. However, our Chairman frequently is in contact with us regarding ethics matters.
Please note that OGE directed the agency to provide only the number of full-time employees directly employed by the agency in 2015.
Question 13: We are in the process of transitioning to a new internal electronic filing system for non-PAS 278 filers.
#15 - For purposes of Ethics Program administration, the Agency Head is OVP's Chief of Staff. #18 - Because OVP's small size as an agency and turnover of our ethics detailees, we continuously review and assess our ethics program, and gain first-hand feedback from employees on their views of our Ethics Program and their specific needs and questions.
#15 - New PBGC Director appointed in October 2015 #19 - While we have informal written procedures, we are in the process of developing formal SOP for the collection/review of financial disclosure reports.
Concerning #15, the ADAEO has periodic informal discussions with the Board's Chairman. Concerning #17, while informal, the General Counsel/DAEO has periodic discussion with the ADAEO about the Board's ethics program. (Note: At the Board, we are a collegial agency that tends to be friendly and informal -- for example, it is not uncommon for the Chairman to pop his head in the ADAEO's office to discuss ethics or other matters.)
#15 The DAEO, Michael Elston meets regularly with the Postmaster General. The Postmaster General attended the exit conference for the Plenary Review.

25. How do you deliver IEO to new employees? Check all that apply. **Table 11**

Employees are invited to ask questions of the DAEO/ADAEO once they have reviewed the written info.
DAEO personally introduces himself to new employees and provides ethics booklet.
Provide handouts to the new employee (including Standards of Conduct).
All new employees are given the Standards of Conduct and DAEO welcome letter during in processing.
For employees in the Denver office, the IEO may take place over the phone.

[T]elephonic (regional office).
E-mail.
USDA's Onboarding Portal, which is mandatory for all new employees, contains an Ethics Orientation Training module which employees are expected to view prior to their arrival at USDA. This onboarding requirement is mandated for all incoming employees by a USDA Departmental Regulation.
Teleconference.
We provide a summary of ethics rules to new employees. OIG has on-line links to ethics information.
Internal agency video-on-demand.
The annual DOL ethics summary is included in the EOD package.
We also provide all new employees with an Employee Ethics Manual.
One-on-one briefing by Office of HR as part of on-boarding process for new employees.
Weekly Teleconference to Regional Offices as needed.
The Foundation has an IAA with IBC/DOI for all personnel activities.
PAS receive in-person briefing.
Written materials mailed to SGE's home.
Talent Management System (online training and tracking system).
Printed materials such as pamphlets and factsheets.
Welcome e-mail with ethics materials attached. HR provides materials in their new employee handbook.
teleconference and computer link.
We also provide new employees with an electronic summary of the main ethics rules for reference.

26. Who developed the IEO training materials? Check all that apply. **Table 12**

Drawn from OGE and other agencies' materials.
Web-based training developed by private company.
Web-based training is provided by Skillport and administered by EEOC's Employment Development Center.
Written materials include statutes and OSC political activities pamphlet.
OGE Website.
We worked with an outside consultant several years ago to develop our web-based training.
Updated version of Federal Personal Guide. RRB is in the process of rewriting our own materials [for] CY16.

Who developed the IEO training materials? Check all that apply. **Table 13**

[W]eb-based training.
Department of Justice printed material.
Senate-produced video for Senate employees.

27. If applicable, explain **Table 14**

All SGEs received annual training as required. 4 staff members met only some training reqs.
AFRH is monitoring more closely that all employees are signing in and being trained as required. In CY16 thus far, we have trained more than half of the required staff. Also note that most of the employees that were not trained were physically located in a different state making more difficult to provide face-to-face training
The ASBCA provides annual ethics training to all employees, whether required or not.
- The Ethics Office is working with the delinquent employee's supervisory chain to complete training.
We lost our DAEO suddenly in the middle of the year, and struggled for the rest of the year to focus on a number of other program requirements. Another 278 filer was also on leave for several months. As for the 278 non-PAS filers and 450 filers, it is possible that one or more received the equivalent of one hour of

training by taking training outside of the annual program but we cannot verify that at this time. Most employees did receive the rough equivalent of one hour of training on the Hatch Act via distribution of information to review.
The number of confidential filers required to receive Annual Ethics Training does not include FACA members for the 2 regional offices that did not submit info for the report. Some of the discrepancy between the # of conf. filers req. to receive Annual Ethics Training and the # who actually received it may be due to the SGEs being included in the CCR's response to #23 re: new entrant ethics orientation. The ADAEO directed regional offices to use OGE's online SGE training for both the new entrant ethics orientation and annual ethics training but is unable to verify that regional offices used the online OGE training. New entrant SGEs who completed OGE's SGE web-based training would have fulfilled the requirement for both IEO and Annual Training (5 CFR 2638.705(c)(2)).
Two employees retired during CY15 and new hires started on or after 11/30/2015.
One public filer was on extended leave and four confidential filers were on extended leave or detail.
One person hasn't completed annual ethics training because she's been on detail to another agency.
278 filers either retired, resigned or transferred before training was offered. See below for 450.
One employee was on extended LWOP and the additional two employees did not take the online class.
[E]mployees who did not take the training were out of the office for an extended period of time (LWOP, military leave, maternity leave, etc.).
Record-keeping is done electronically and is not within the control of our office. We believe that these filers completed the training but were unable to confirm.
12 employees departed 5 employees deployed 1 employee on LWOP and 23 filers delinquent.
Employee was on extended leave.
Some filers left or retired from USDA before completing their annual Ethics training.
Discrepancies primarily attributable to employees departing prior to due date for ethics completion, extended sick leave, and deployments. Additionally, due to extended medical leave of their EC, one component was late in disseminating training to approximately 400 employees. The component is continuing to pursue obtaining confirmation of completion from approximately 200 employees.
One 278 filer is out on extended sick leave. Four confidential filers are on extended sick leave.
Due to extenuating circumstances. In addition, one office requires all employees to receive ethics training.
Some Filers left the agency despite having completed their Form 450s prior in the calendar year. Others were on extended sick leave or retired before the end of the calendar year.
Required filers were sent several notifications but failed to attend or watch the training.
Departure/detail prior to training, extended leave status, military deployment. DEA experienced a delay due to technology delays with their LMS which wasn't launched until Jan '16. See comments below for more info about training in 2015.
All filers received the annual written materials and many filers terminated before the end of year training.
These numbers represent the information provided by each bureau. There are still some bureaus which are verifying their ethics training information.
Data based on inputs from field offices around the world. Reasons vary from location to location.
Some filers failed to comply with the training requirement, lower commands failed to identify, [etc.]
The vast bulk of the discrepancy is account for by one activity that moved its HQ from DC to Norfolk
[M]ost employees [are] in extended leave status.
Employees on extended leave, detail assignments outside of agency, [and] left prior to annual training.
Public filers include termination reports. CFD filers include some who are no longer VA employees.
[V]arious leave status (maternity, extended sick, [or] annual leave), retirements, people on detail out of the agency, [and] follow up ongoing with employees who haven't yet taken the training.
7 public filers left EEOC prior to training. 4 non-public filers on extended sick leave.
2 employees on military duty [and] 1 employee on extended sick leave.
Employees did not complete training during the calendar year.

Employees who did not take the ethics training were on extended leave, detailed or left the Comm.
2 SGEs have received extensions of time. 7 others perform little work and are difficult to contact.
Due to separations extended medical leave retirement and detailed to another agency.
Some employees are on maternity/military or extended sick leave.
In 2015, 49 of 51 persons were trained. One filer terminated and one deceased before training date.
One Advisory Committee member was out of the country when the ethics training session was held. He has, however, received the required verbal training within the past three years.
Employees are completing AET by February 2016.
The two 278 filers left before the end of the year and three 450 filers left before (continued)
All but 1 employee left the agency before training delivered 1 employee on extended medical leave.
One employee who was on extended sick leave left the agency on 12/31/15 without completing training.
Numbers provided in received fields are completion percentages. Specific numbers available to OGE as required. Filers still in covered positions continue to complete the annual training after the 31 December 15 date. There are a variety of operational and administrative reasons the OGE450 and OGE278 filers did not complete the training on time.
For nine individuals, the training due date is not until early 2016. NRC is considering process imp.
Two employees are on administrative leave and one employee is on medical leave.
There were some employees we were not able to reach for training, despite repeated effort.
- For annual training (under question 27) we counted non-PAS employees and confidential financial disclosure filers who received either new employee initial ethics orientation (IEO) training or annual ethics training. - Peace Corps had 42 Public filers (OGE-278) non-PAS in 2015 with only 34 receiving Annual Ethics Training. The 8 Public Filers that did not receive training left Peace Corps for another federal agency or private/non-profit organization for employment. - There were 382 Confidential Filers to receive Annual Ethics Training in 2015. There are 17 discrepancies because 15 filers left during 2015 calendar year, 1 employee converted to a non-450 filing position during the 2015 calendar year and thus no longer required to have annual ethics training, and 1 employee is still within the first 90 days of employment and is expected to complete ethics training within the 90 days.
Did not attend any of the 9 in-person training sessions conducted by OGC. Make-up sessions pending.
278s: 2 didn't receive training due to medical conditions, 1 was on an extended absence, [and] 2 were late.
Prior to the end of the calendar year the Chairman retired, and his Schedule C employee left the Bd.
Illness, separation from the agency, [and] claims of technical difficulties. We continue to follow up with filers to ensure completion.
Our 450 filer was on extended maternity leave. The 278 filer left on extended emergency leave.
Some filers left agency, others were on extended leave, & others were not notified due admin error.
Due to scheduling & technical constraints, six employees completed the training during January 2016.

28. How do you deliver annual ethics training to employees required to receive training? Check all that apply. **Table 15**

SGEs received a memo detailing post-employment restrictions and how those restrictions specifically relate to their work with the agency. The memo also included the Federal Principles of Ethics.
[T]elephonic (regional office).
Recording of live training available for replay.
USDA utilizes AgLearn, a long-distance electronic learning tool which contains several videotapes of live ethics training sessions, ethics modules, and USDA's "Ethics Sweepstakes" an interactive ethics game (a competitive horse race).
Internal video on demand, Microsoft Lync and Skype for business.
Ethics attorneys are on call to answer questions that arise while employees are watching training video.
Personal Ethics Training Briefings.

GSA Online University [and] online instruction through a screen sharing program.
Classroom Instruction with power point. Employee participation is required. [In] 2015, we used the Jeopardy Game format.
In some years we do in-person ethics training or one-on-one briefings. This year, we provided self-paced written training materials via e-mail. In addition, the DAEO conducted in-person subject-specific briefings with senior staff.
Go-to-Webinar [and] Go-to-Meeting.
Recorded presentation.
Ethics Website and electronic employee newsletter.

29. Who developed the annual training materials? Check all that apply. **Table 16**

[M]odeled from DOJ training materials.
DoD Standards of Conduct Office Webpage.
Other agency website.
We contracted with Commerce to have two of its employees provide live training that we recorded.
Another office provided a web-based ethics training module for some staff.
Some OVP employees took annual ethics training form White House Counsel's Office.

32. Did you provide additional, specialized ethics training during 2015? **Table 17**

SGEs.
Presented an Ethical Leadership Course to managers at USAID/Pakistan. See additional comments.
CSB PAS Board Members. Contracting officers received procurement integrity training in order to maintain their certification.
Commissioners.
CFPB's administrative staff and the Director's Financial Analysts.
Research and Evaluation office staff. New employees in Corporation State Offices.
DAEO provided Hatch Act training to senior staff, and [is] planning to provide it to all staff in the coming months. DAEO also provided targeted training at Senior Staff meetings regarding job-seeking and post-employment ethics issues.
DLA Acquisition Workforce received training, regardless of financial disclosure filing status.
USDA Scientists, USDA Senior Executives, Forest Service Job Corps Directors, Farm Service Agency State Executive Directors and Administrative Officers, Food Nutrition Service employees in Regional Offices, [and] Animal and Plant Health Inspection Service staff.
All Bureau of Industry and Security employees.
As requested by clients. While not required for all DoD, some components require for all of their personnel.
Specialized training per principal office component request.
Political appointees, new supervisors, and mid-career and retirement eligible employees.
Other groups include contractors, grant specialists, grant officers, senior staff, administrative law judges, IPAs, fellows, and interns.
Flag Officers and Spouses, SES, Immigration Services Officers, FCF Keyworkers, [and] Op-Divs.
We encourage non-filers to attend annual training events and the webcast is available for all employees to view at their convenience.
Attorneys, JMD Finance Staff, users of Integrity, contracting staff, Advisory Committee/Boards, interns, PAS employees, retirement seminars, [and] overseas employees. FBI: Legal Attaches, [and] Lab Division staff BOP: Wardens, Chaplains, education staff, [and] prisoner re-entry staff.
-Attorneys. -Grant Managers. -Senior Department Officials. -Investigators.
Senior Leaders (SES/General Officers).

Army OGC provided focused ethics training to Congressional Liaison Fellows, Army Science Board Members, Civilian Aides to the SecArmy, Training with Industry personnel, General Officer Aides, and AMC Senior Commander spouses.
Flag and General Officers and their staffs.
For DO, sessions for specific offices were offered on financial conflicts of interest gifts outside activities Hatch Act. One bureau fulfilled a request to speak at a meeting of the Association of Government Accountants.
Chief Scientists, [and] FAA employees based overseas
New SES employees [and] VHA Non-profit research corporation staff
[P]olitical appointees, various branches or offices as requested FACA committees [and] LEGIS fellows
Chairman and Political Board Staff.
Commissioner's staff.
New supervisors and new Commissioners.
Out stationed Examiners.
Public filers using the INTEGRITY system were provided training materials on its use.
OIG staff, banking supervision and regulation staff.
#32 Provided in-person training at group staff meetings on various ethics topics. The groups requested additional information with an emphasis on how the topic related to the group's primary mission area. Also provided Hatch Act briefings where ethics was also discussed. We conducted numerous one-on-one seeking/post-employment briefings.
Special government employees, agency fellows, interns and volunteers.
One Center required all personnel to take ethics training, certain HQ offices and mission directorates were provided targeted training.
Some non-filers attended remote training sessions we did for our regional offices.
-Government Employees who work closely with contractors. - Post-Government Employment Training.
IG, new program officials, management, [and] departing officials.
Provided additional training to professional development program participants.
Office(s) that requested specialized ethics training, as appropriate.
Employees of the U.S. Digital Service, who are often on leave from a private sector employer, here for a short period of time (not SGEs, however).
OPM Federal Investigative Services Group.
[S]pecific components based on need.
Senior agency management officials received extra training on post-employment ethics requirements.
Trust Board members.
A class of new field office managers at a meeting in Indianapolis, [and] class of new supervisors at HQ.
Interns, National Women's Business Council Staff, Regional Administrators, Political employees, [and] Office of Advocacy employees.
ALJs, attorney advisors, public affairs specialist, and new SAUSA for the fraud program.
Agency Staff preparing for certain site visits.
Executives and TVA Board of Directors
Public Affairs & Communications, Operations, New Executives, and Special Situations in Field at request of Management.

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. **Table 18**

27. There were 87 OGE-450 filers, 40 non-PAS OGE-278 filers, and 3 PAS OGE-278 filers that separated prior to attending their 2015 annual ethics training. In addition to providing live ethics training to our 4,300+ financial disclosure filers, we also provided live ethics training to thousands of non-financial disclosure filers. Together with OGE's General Counsel, we briefed approximately 30 members of the Mexican Government's Secretariat

of the Public Service on a wide range of topics related to ethics, unjust enrichment, and financial disclosure. Agency did not provide training to Commissioners in 2015. Will rectify that this year.
Responses to Questions 23 and 27 are classified and will be provided to cleared OGE personnel upon request.
The Commission's response to Part 6 only includes data from headquarters and four of the six regional offices. Two regional offices did not respond timely to Ethics Staff's requests for 2015 ethics information regarding FACA/SGE members. Therefore, ethics data from those two regional offices is not included in this report. For additional information, please refer to the Commission's response to question #22 about the challenges of overseeing the regional offices ethics program.
I plan to do more training during the year and Hatch Act training early and during CY 2016.
Question 28: we provided annual ethics training this year to filers grouped by the office in which they work, and tailored the training to ethics issues that might arise specifically for those groups (based on job duties, interactions with the public, etc.). Question 32: We provided training focusing on social media and the Hatch Act at a "Lunch and Learn" session that was offered to all CFPB employees. We trained the Director's Financial Analysts on the seeking and post-government ethics rules, and provided an ethics refresher training to the CFPB's administrative staff.
#27 Two 450 filers missed training and 59 retired, resigned or transferred before training offered.
Question #17 - CEQ participated in an Program Inspection with OGE in 2015. In preparing for the inspection and as a result of the inspection report several improvements were made to CEQ's ethics program.
#32 – [W]e provide ethics training as part of a one-week course for new supervisors.
#23. Ethics Training is a part of DIA's mandatory orientation for all personnel (civilian and military) prior to receiving the required security, computer, and building access. Therefore, all required filers are captured and trained.
#27. DLA had one OGE 278 filer depart the agency after filing his annual report, but prior to completing Annual Ethics Training.
23 continued: We did not track the dates the employees actually received the training. We are in the process of changing our procedures to ensure we track this information in the future.
Special training was provided on political activities, contracts, procurement, and to all Bureau of Industry and Security (BIS) and the First Responder Network Authority (First Net) personnel per the Bureaus' request. Question #27: (1) Training was provided to 718 employees in the Washington, DC area who file the OGE Form 278. The remaining employees are not in the DC area and received training via written materials pursuant to 5 C.F.R. § 2638.704(e). The only exception is the one employee in DC who was unable to attend the training due to health issues. (2) Verbal, triennial training was provided to 1796 employees pursuant to 5 C.F.R. § 2638.705(c)(1). The remaining employees received training via written materials pursuant to 5 C.F.R. § 2638.705(c)(2) as they had received verbal training within the past three years.
29. The agency purchases web based training from SkillPort, a private company that produces training modules for government agencies. All DoD IG employees were required to take the SkillPort e-learning module entitled "Government Ethics" for the 2014 annual ethics training. The content of the training comports with the requirements of 5 CFR 2638.704(b). 30. All other employees have been designated by the head of the agency to take annual ethics training because of the agency's oversight responsibilities. 32. OGC provided an ethics briefing during the DoD IG New Supervisor's Course.
23. Components reported that some employees did not respond to reminders to complete IEO because they had technical difficulties in accessing HHS' Learning Management System (LMS) or were on extended absences. This past year, LMS recoded its system, which created unanticipated access issues to the online IEO training, that were greater than previously experienced in prior years. 27. All personnel that are required to receive AET are notified by email to take the online training module via LMS. As part of the sign-in process the employee was required to identify himself so the automated tracking system documents the completion of the AET. The employees in the "Others" category are from HHS components that required all employees to take AET. Components also reported that some employees were unable to take AET because they were on extended medical leave or administrative leave, detailed to another agency, lived overseas, left the agency, deceased, or were on military deployment.

32. Leadership development course attendees, new attorneys, and 450 reviewers.
25. Written materials alone for IEO are utilized only for employees who cannot attend live IEO, e.g. field personnel 27. Others: Most attorneys in DOJ are required to receive 1 hour of government ethics training every year as a component of Professionalism Training. The # of attorneys who received ethics training under this requirement in 2015 was approximately 9,800. Most attorneys at DOJ are financial disclosure filers, but not all are. Also, some components of DOJ require all employees to receive annual ethics training independent of their financial disclosure status. Those components include BOP, ATF, the Criminal and National Security Divisions, and the Offices of Information Policy and Public Affairs. The # of employees who received ethics training under this requirement in 2015 was approximately 55,000. Many of these employees are also financial disclosure filers, but not all are.
30 Some employees take the ethics training even if they are not filers. #32 Initial Reviewers Training for Supervisors required to review financial disclosure reports. Point of Contact (POC) for those HR or administrative staff selected to maintain lists of filers, supervisors who review reports.
Q23 cont.: written IEO materials to new Soldiers during their initial training. The IEO materials were formerly included in the "Blue Book" given to new personnel. In the new version of the "Book" TRADOC training personnel inadvertently omitted the IEO materials from the book because they did not understand IEO requirement. The TRADOC Staff Judge Advocate is working to remedy this problem by having TRADOC providing the IEO materials again to all new Soldiers during initial training. As before, new Soldiers will receive one hour to review the materials.
#23 We received from HR the names of 186 individuals who accepted employment with FERC. Of the 186, eight of them changed their minds after accepting an offer. As a result, the agency actually had 178 new employees in 2015, and each of them received IEO training. #27 PAS employee left the Commission before 2015 training launched.(Philip Moeller) SES employee is on extended leave.
We provided all Agency employees with Hatch Act training as well.
Q.30. New Staff Assistants to Political Appointees. All regional office staff.
#23c - We were recently advised that one of the individuals who did not receive training was still an employee. If status is confirmed, we will provide the training. #27 Although we only have two(2) PAS, one is counted in new employee training section and the other PAS is counted twice in the annual training section because she received annual training while in a SES position and then again when she moved to the PAS position. #29 As part of GSA's annual training for non OGE Form 278 filers, GSA also used OGE's video, Public Service Public Trust.
In regard to question 27, one confidential filer was on extended maternity leave and is expected to complete the training by 01.15.16. The other employee completed the training late on 01.07.16.
New Entrant Training: 2 employees trained beyond 90 days were interns. 10 of the 12 that did not get trained were interns. The Alternate DAEO who conducts the in person training was out of the office for bereavement reasons for two months. Review of ethics documents and the filing of a certificate of completion was required in place of the in-person training. The 10 students left the agency before the Alt. DAEO was able to follow up with them. The two permanent employees who have not yet received the training will receive it this month. They had been asked to attend the in-person training multiple times but they did not come.
All employees in the Contract Management Department take a Procurement session of Ethics Training created specifically for that department.
Question 23:(cont.) so if someone joined right before the date and did not make it to the 1st training, by the next session they were beyond the days. Other centers used online training and the new entrants are reminded of the 90 day requirement to complete the training. 96.6% of the new employees completed their initial training on time. Question 27: (cont.) training was scheduled eight 450 filers were on long term leave related to their or a family member's health and did not return before the end of the year. Six FACA committee members did not complete training, but will prior to participating in further committee meetings. Question 27: Pursuant to OGE's request in NASA's 2012 program review, NASA has instituted an abbreviated ethics training procedure for peer reviewers filing the alternative form could receive ethics training as part of the peer review process. Also, one center directed all personnel to attend annual ethics training.

23. & 24. Although IEO is part of on-boarding, in some offices the employees actually do the training on their own.
Q.27. The discrepancy between the number of employees required to receive training and those who did is because six employees left the agency before completing annual training. Before they left the agency, these employees did receive monthly ethics briefings and a post-employment ethics briefing. Q.30. NEH provided training to employees not required to receive training. NEH requires all staff, not only financial disclosure filers, to take annual ethics training. A total of 180 employees received ethics training. Q.32. NEH ethics officials frequently answer ethics questions from individual staff members and take these opportunities to provide on the spot training on specific issues.
Question 30: Annual Standards of Conduct/Ethics training is mandatory for all government employees in the agency. Question 23 and 27: Classified due to intelligence mission. Additional information available upon request in proper forum.
#31 - Continued to provide timely and interesting topics to all Agency employees through the Agency newsletter, Job Aids, and Ethics Advisory memos. These topics included The Hatch Act and Upcoming Elections, Speaking Engagements, Gifts, Lawyer Rules of Professional Conduct, Seeking Employment, Post Employment Restrictions, Participation on a Non-Federal Board of Directors, and Fundraising Activities.
Question 23: The NSC staff includes a significant number of detailees from other government agencies. We provide IEO to all new direct hires and all new detailees, typically on their first day at NSC. Questions 27 and 30: The NSC staff includes a significant number of detailees from other government agencies. We require annual ethics training for all NSC staff direct hires and all NSC staff detailees we encourage all contractor personnel to attend. The numbers reported in Question 27, however, reflect only NSC direct-hires.
#23: NRC is considering process improvements and is actively following up with the individual employees to compliance.
27. Three employees did not complete annual ethics training - 2 employees were on administrative leave and one employee was on medical leave. 31. OA provided in-person Hatch Act training to all political appointees, managers and supervisors. We also provided mandatory on-line Hatch Act training for the rest of OA staff, with questions at the end of the training that required staff to answer a certain number of questions correctly in order to complete the training.
One of our public filers left the agency before annual training was provided.
Most employees receive initial ethics training by ethics officials in the Office of Administration. However, political appointees and employees of the U.S. Digital Service receive in person ethics training from OMB ethics staff shortly after coming on board.
We provided specialized ethics training on seeking post-government employment.
#23 - Includes both EOP and Senate payroll employees. #30 - It is OVP policy to provide annual training to all OVP staff, as well as ensure that all detailees receive annual training either from OVP or from their home agency.
#23. This included 66 student interns who work on a temporary unpaid basis.
In 2015, in person specialized ethics training was provided to new overseas Medical Officers who attended training in DC, Personal Service Contractors (Host Country Nationals) who attended Overseas Staff training in DC, and all new Overseas US Direct Hire staff who were scheduled to attend Overseas Staff Training in DC, Volunteer Recruitment and Selection Recruiters managers were given Hatch Act training via teleconference in 2015. Live specialized ethics training was provided to all new Supervisors in 2015. Also, a short Hatch Act training was provided to all Senior Staff to refresh their knowledge of this important topic and we provided ethics training to all staff at three overseas Peace Corps posts.
#27 - OGC conducted 9 in-person training sessions for employees to fulfill the annual training requirement. Employees were provided with multiple reminders, including reminding the employee's supervisor about the training requirement. Make-up sessions are pending as OGC plans to train all employees required to complete annual training. Additionally, the numbers do not include employees who filed a report in early 2015 but departed PBGC by late 2015 when annual training was conducted. #31 - Provided Hatch Act training.
Question 27 - All Commission employees are required to attend yearly in person training. Office of Special

Counsel provided in person Hatch Act training to all employees as well.
10. For 450 filers, the Trust did a search of filers to receive the training notice and the 450 filers were omitted from the list. 30. The Trust does send memos to all employees covering ethics topics such as tax compliance, standards of conduct, and gifts.
[O]ur CORs are required to file 450s, so the COR 450 filers are contained in the 3335 number above rather than listed under "other".
We added information on the Hatch Act this year with the upcoming election. We obtained our information from OGE and the OSC.
Question 30: All TVA employees are required to take annual ethics training. Contractors are strongly encouraged, but not required, to take the training. TVA Officer/Executive-level employees are required to take an additional module as part of the annual online ethics training.
We provided training to our contractors in Hanoi, Vietnam through ethics training that I inherited in the office and have adapted to address specific issues.

34. Has you agency ethics program implemented any of the following practices? **Table 19**

Other practices include conferring with the designated Attorney Advisor, OGC, and HHS.
Historical files/archives/review email archives.
Most advice is memorialized.
Use of Ethics Attorney Mailbox by subject.
Sharing ethics advice between command legal offices to ensure consistency.
We archive our chron file electronically and can search by subject matter and individual.
List of activities and advice by month.
Use of OGE website.
Checklists that guide the employee on what information to provide the Ethics Office.
Peace Corps provides standard template questions for answering advice on WAGs, Travel/Gifts, and Outside Activities.

36. How do you make employees aware of the availability of post-employment counseling? Check all that apply. **Table 20**

All OGE 278 filers annually receive DoD SOCO's Summary of Seeking & Post-Government Employment Laws.
Agency TV and website notifications.
DSS Office of General Counsel's Ethics/Standards of Conduct intranet webpage.
Agency Ethics Website.
When our negotiation form is filed, during Initial Ethics Training, and by informational handouts.
Post government information is available online 24/7.
#6 Periodic briefings or use of the Ethics and Political Activities Webpage.
Ethics Newsletter & other outreach endeavors website.
We also addressed post-employment issues during new entrant and annual training for employees.
Because our office is so small and turn-over is very low, this is done on a one-on-one basis.
Send out EthicGrams. Employees are also informed during Initial Orientation.
Post-employment restrictions and POCs for requesting advice are available on NASA's ethics website.
Agency Newsletter and Ethics Webpage.
[I]nternal agency website.
In-person post-employment briefings with departing political appointees (Senior Staff).
PBGC intranet.
Advice and counseling.

Noted in the Ethics training for SGEs.

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. **Table 21**

The response to question 35 is classified and will only be provided to cleared OGE personnel upon request.
#35. [T]o the best of our knowledge. It might be best for OGE to cross check its records.
The Commission's response to Part 7 only includes data from headquarters and four of the six regional offices. Two regional offices did not respond timely to the ADAEO's requests for 2015 ethics information regarding FACA/SGE members. Therefore, ethics data from those two regional offices is not included in this report. For additional information, please refer to the Commission's response to question #22 about the challenges of overseeing the regional offices ethics program.
The Presidentially appointed Committee members from other agencies report through their other federal appointments.
Question 36: The written and oral guidance delivered to departing employees as part of off boarding process informs them that the ethics office continues to be available to them for ethics advice post-employment, and we regularly receive questions from former employees.
DAEO has also provided "mini-trainings" and made myself available for questions after our regular staff meetings.
Q. 33 Financial Disclosure and Impartiality Rules were tied for third among DDAEO organization responses.
36. Public filers in DoD IG receive annual post-employment counseling through the FDM electronic filing system. They certify acknowledgement of the counseling through FDM.
36. The Ethics Division held post-employment brownbag sessions that were available for interested HHS employees in 2015. Employees are also made aware of post-employment counseling through post-employment information letters, certified mail, blogs, newsletters, consultation, and phone calls.
Q33: Post-employment restrictions tied with Conflicts for third of topics for which advice is most frequently sought.
#35 There were 52 notification statement of Negotiation or Recusals submitted, covering 123 non-Federal entities.
34. We maintain a subject matter library on a closed ethics site available only to ethics officials. 36. We generally mention post-employment in initial orientation and we cover it in annual training. As part of out-processing for all 278 filers, we cover post-employment. We offer an in person post/seeking employment session for all PAS and their policy advisors near the end of their terms.
#34: We use an Excel spreadsheet to keep track of financial disclosure reports filed and training received.

46. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply.

Table 22

Periodic reminders to the filer's financial advisor.
Would notify the ASC Chair if needed.
Notify appropriate attorney.
Referral to OIG.
Division ethics officials are copied.
Direct discussion with the filer.
- In-person or telephone conversations with the filer.

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. **Table 23**

ACUS will begin using Integrity in 2016.
General comments: A number of members of our agency's board are the heads of other federal agencies and their designees. They file their financial disclosures at their home agencies. Since their home agencies handle the collection and review of their filings (as well as their training), their numbers are not reflected here. Regarding question 37: For some reason, we forgot to add the DAEO to the list of OGE 278 filers in last year's annual report. That is why last year's report reflected only 1 filer (the SES Executive Director), and this year reflects 2 filers (the Executive Director and the DAEO). Regarding question 44: The more accurate answer is "not applicable." We did not have any new employees required to file financial reports in CY 2015. Regardless, due to the small size of the agency, DAEO is always aware of all new employees (whether or not they need to file financial reports). Regarding question 47: The agency will begin to use Integrity this calendar year (2016).
47. Will be using Integrity for the 2015 Public Financial Disclosure.
The ASBCA will use Integrity for the filing of all of 278e and 278-T filers starting in January 2016.
Responses to Questions 37-42 and 49 are classified and will only be shared with cleared OGE personnel upon request.
49.g, h,: we are unclear as to how this should be calculated. So, we included only the cost of the system itself. If OGE can provide additional guidance, we can update the response.
#49 g) undeterminable h) undeterminable.
Will implement Integrity for Public Financial Disclosure filers in 2016.
Question 48: After November 1, 2015, we began using Integrity for new entrant reports for public financial disclosure filers. On January 1, 2016, we began using Integrity for all public financial disclosure reports.
Question #37 - Please note that all "others" listed were employees acting in filing positions - 1 acting Sched C and 3 acting career SES positions. Question #49(l) - 388 includes annual and new entrant filers.
49 g & h No internal costs calculated. 49 k some filed new entrant & annual.
Integrity will be used beginning in CY 2016.
All required financial disclosure reports for 2015 have been filed and certified as of the date of this submission. One Schedule C filer was granted a 90 extension, awaiting financial information, and then his mother passed away. He filed the report and it has been certified. Given the extraordinary circumstances, the DAEO waived the late fee. Two new entrants were granted 90 day extensions for good cause found based on press of duties, and then additional delay occurred as the DAEO attempted to determine whether they needed to file public or confidential disclosure reports pursuant to CEQ's policies and OGE regulations. Both reports have been filed and certified. Given that the filers were not responsible for the additional delay, the DAEO waived the late fees. CEQ will be using Integrity for the 2016 filing year, and therefore such issues will be addressed and remedied.
Question 44: All 278 filers are timely notified. Given the size of DLA, we cannot guarantee timely notification of all OGE 450 new entrant filers however we are able to confirm the vast majority of OGE 450 filers receive timely notification.
49(j): DAEO is expected to file 2016 annual OGE 278 report in Integrity.
Our agency began using INTEGRITY for a short time, but use was suspended pending a security review.
Q.44 - The vast majority are received timely. However, there are occasional oversights/miscommunications.
Q.46 - While no referrals were made, notices may advise filers that delinquencies may be referred to DOJ.
49. The Executive Agent for FDM is the Department of the Army. Costs for administering FDM are borne by the Department of the Army. The Department of the Army does not charge DoD IG for use of FDM.
All OGE 278e filers who filed in Integrity were automatically granted a 45-day extension to file their annual submission because all filers were required to file in Integrity for the first time.
37. Components reported that some employees transferred to other agencies or had become deceased. Components also had new entrant and termination filers with recent start and exit dates that are still within

the window to submit reports on time. 46. (Other) - Other steps include restricting official travel, meeting face-to-face, revoking computer access, and asking OGC for guidance. 48. HHS will use Integrity beginning in 2016 for all of its Presidentially Appointed Senate Confirmed (PAS) filers. It will transition a majority of its OGE 278 filers to Integrity, as well.

44. Ethics Officials in some components experience a delay in notification of new filers, in particular when employees serve in covered positions in an acting capacity. Components continue to work with their HR/Personnel offices to improve timely notification processes. 45. In some offices an intermediate review is performed by an official in the filer's supervisory chain. 48. EOUSA is unable to report these costs because they are included in the overall Case Management Budget which includes various systems, IT servers and other resources, and staffing. The internal system is being phased out and will be used only for Termination reports and historical records in 2016 due to transition to Integrity.

#50 Department of State uses e-forms for OGE-278-T Reports.

Note on response to Question 44: Given the size of the agency, we are able to confirm that Ethics personnel received timely notification of arrival of the vast majority of new entrants who need to file financial disclosure reports.

Q 37 Includes Nominee reports filed for nominees who were not confirmed. There was a decrease in the number of Flag Officers reported in the "other" column because in past years we reported officers detailed outside of Navy when their reports were certified by other DAEOs. Q 49. The Army runs FDM and includes all costs in their budget.

Q 47-50: Most Treasury bureaus did not fully implement Integrity in 2015, although some did and others used it among select filers. Note: DO began using an OGE 450 e-filing program linked to its ethics database in 2016.

Q49: The total projected costs and amount to be paid to a non-federal vendor in 2016 for FAA's use of FDOonline cannot be determined at this time due to changes in contract administration.

Beginning in 2016, VA uses Integrity for all public filers.

Q. 47. Use of Integrity was optional for 2015 and several filers used it. Those who did preferred it.

Costs associated with FCA's own e-filing system are negligible.

49. The cost of FCSIC's own e-filing system is negligible.

#50 We plan to implement e-filing for the OGE Form 278 filers this year.

With respect to question 45, only one division (OIG) requires intermediate review of public financial disclosure forms.

We used Integrity.gov as part of a pilot.

In calendar year 2015 IMLS used FDOonline to for filer 278s, 450s and transaction reports. In 2016, IMLS will use FDOonline for its 450 filers (only), All 278 filers will transition to the new OGE Integrity system in 2016.

The Agency is currently not using Integrity.gov, but is in the process of getting set up to use Integrity going forward in 2016-17.

2015 we only required OGC personnel to use Integrity. This year all public filers are required to use the system

Question 44: There were a few cases where the HR system and the EPTS did not sync properly so notification to the filer to file a new entrant report was delayed. Also, there was an instance of a discrepancy in an SES appointment effective date. Question 49, J and L: The numbers are approximations because the agency cannot project changes in the number of filers due to personnel changes.

46. No delinquent filers in that all filed within extensions granted. We did send repeated reminders as extension dates neared. 50. 278T forms were filed manually in 2015 as FDM does not allow for them. We have moved to Integrity for 278Ts in 2016 and we will use Integrity for 278 annual reports as well. We will continue to use FDM for all 450 filings.

Q.48 NEH employees did not file any reports using Integrity in 2015, but our PAS and DAEO employees are set up in and prepared to use Integrity starting 1/1/2016. Q.49(k). This number includes both full-time NEH staff and the 23 members of NEH's advisory committee, the National Council on the Humanities, who filed electronically in FY2015. One National Council member filed on paper. Please note that we answered this question, as asked, for the fiscal year. The other numbers in this report reflect the calendar year unless otherwise specified in the question.

Classified due to intelligence mission. Additional information available upon request in proper forum. Question 49: We are projected to have greatly reduced OGE450 numbers this year due to improved communication with workforce on who should file. Question 49 i-l: classified. additional information available on request in proper forum.
#40 - This individual had received extensions and late fee waivers in 2014. They were counseled in 2015 regarding timely reporting. However, they filed additional late reports in 2015 resulting in late fees. The individual is no longer with the agency. #44 - In question #44, we indicated that we did not receive timely notification of all employees required to file a new entrant financial disclosure report. This was indeed the case from January to July 2015. However, since July when we implemented the new procedures with HR we have received notification from HR each pay-period and have been able to notify all new entrants in a timely manner.
Q 44 - We are able to confirm that the ethics office has received timely notice of the vast majority of employees required to file a new entrant financial disclosure report in a timely manner. There is a system in place whereby HR officials notify the ethics office of newly hired and newly elevated employees required to file entrant financial disclosure reports. There are occasions where the correspondence from HR to the ethics office is not always completed in a timely manner.
Question 37. Nominee subsequently withdrew her nomination.
#39 & #40: Included in the periodic transaction report total are thirteen reports filed late. We waived the late filing fee for one filer's late filing because it was due to a miscommunication on the part of the filer's financial planner. We discovered the other filer's need to file his 278Ts only after reviewing his annual 278. We counseled him on the importance of filing his 278Ts on a timely basis, and we will continue to stress its significance to him and our other 278 filers.
Cost of electronic filing system cannot be quantified as it is an integrated system that is used for many different types of projects, not just the OGE 450 electronic filing program.
Our agency plans to start using Integrity in the future for OGE Form 278 and the 278-T.
Questions 49(a)-(d) and (g)-(h): the electronic financial disclosure databases we used in 2015 for both 450 and 278 reports are part of an agency-wide business system and costs for just the financial disclosure databases within the system are not reasonably separable for reporting purposes. We will continue to use this internal agency system for 450 reports in 2016, but are transitioning to a new electronic financial disclosure system in 2016 for 278 reports. Those costs are reflected in the answer to 49(e)-(f).
#37 - PBGC has two Schedule C filers who are required to file the 278. One of the Schedule C employees filed a new entrant report in December 2014 and was, therefore, not required to file an annual report in CY2015. #44 - OGC must rely on the Human Resources Department and employee supervisors to identify new employees who meet the requirements to file.
38. Paid late fee is pending.
Began using Integrity in 2016.
Concerning #43: While the Board does not have an automated system to track financial disclosure reports, the ADAEO tracks the Board's 40 filers on an Excel spreadsheet.

53. What steps do you take to collect delinquent confidential financial disclosure reports? **Table 24**

Notify appropriate attorney.
Notify Program Chief of Staff.
In one bureau, if a filer is late for 3 consecutive years, the filer is subject to administrative action.
After notifying first-line supervisors, will notify facility directors, then VA Chief of Staff.
We also notify Assistant Bureau Chiefs for Management in each Bureau/Office of delinquencies.
Notify the Administrative Officer.
In-person or telephone conversations with the filer.
Partnered with HR to emphasize the importance of submitting reports.

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. **Table 25**

Responses to Questions 51-52 are classified and will only be provided to cleared OGE personnel upon request.
52. to the best of our current knowledge.
52. Two new entrants started 11/30 and 12/14 and told to file by February 15.
Question 51 - of the 400, 42 were new entrant filers, 114 filed the annual 450, and 244 filed the 450A.
Due to logistical issues arising out of a change in external agencies for ethics program services, OGE Form 450s were not requested from or received by staff in 2015. These issues have been corrected for the 2016 filing season.
#51. Remainder of Agency - 4 retirements 12 reports not started/incomplete.
50. The agency uses the alternative format contained in the OGE approved Financial Disclosure Management (FDM) E-Filing System.
51. Components reported that some filers encountered difficulties completing their OGE Form-450 electronically or retired, resigned, or were transferred to other agencies. In addition, components reported that some filers were on extended medical leave or are still within the window to submit the report. 53. Other steps include restricting official travel, using the DEC POCs to email and contact supervisors and EOs, obtaining guidance from HHS and referring to the OGC Ethics Division.
Q:51 cont.: their filers, and may have counted filers who were no longer in a filing status on 31 Dec.
The reports are typically not delinquent and the agency head is able to procure them in a timely manner.
51. As noted we use FDM which prints out as an OGE 450 form.
Question 51: classified. additional information available on request in proper forum.
Q 51 - Number inserted in # Filed field is a percentage. Specific numbers available to OGE as required.
Question 52: Federal offices were closed on the due date (2/17/15) because of snow, so 4 people were granted one or two day extensions to complete their filing.
Question 51: One employee was hired in August 2015 who did not file by December 31, 2015 due to an oversight. The employee had completed a pre-hire ethics questionnaire that covered essentially the same items as the OGE-450 which was reviewed by an ethics official prior to the employee beginning government service.
450 filers who got New Entrant Training were not required to also do annual training.

57. Number of remedial actions taken because of information on a periodic transaction report in 2015.

Table 26

Conflict of Interest caution notice issued to filer.
PAS official converted a managed-stock account to a brokerage account requiring her trade approval.

65. Which individual(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202)? Check all that apply. **Table 27**

IG coordinates within the OGC Ethics Division when filing Form 202.
Director, Departmental Ethics Office.
Naval Criminal Investigative Service.
For IRS, Assistant Special Agent in Charge, Policy Team, Treasury Inspector General for Tax Administration.
Ethics Officials (Deputy Ethics Counselors).

ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds. **Table 28**

#65. The General Counsel is the DAEO.
54-57 In 2015, there were 12 public filers that executed 42 recusals (including 1 recusal from PAS employee). 1 Public filer granted a 208 (b)(1). waiver. While we do track the actions for filers (OGE 278 and OGE 450 Filers), and non-filers, we do not track whether the action was a result of a financial disclosure or 278-T review. We have worked hard to create an ethical culture at USAID (live training to over 8000 employees including over 4000 non-filers). We train our employees to recognize potential conflicts of interest so that we can address these issues at inception. Although some of our remedial actions may have been the result of financial disclosure, or periodic transaction reviews, the majority of these actions were executed as a result of issues brought to our attention following ethics training.
Sole referral to DOJ for failure to file was made by the State Department Office of the Inspector General.
Responses to Questions 54-64 are classified and will only be provided to cleared OGE personnel upon request. The IG is aware that the Form 202 must be filed with each referral and they will ensure that the form is submitted as appropriate.
64. Investigation referral was for another agency's former employee and is still pending. 65. Has not happened before.
Questions 54 - 57: We work closely with public filers concerning their financial disclosure reports so are aware of numerous instances where public filers have taken remedial actions based on our ethics advice due to information contained in a new entrant, termination, transaction, or annual report. We do not track specific numbers.
#64. Referrals are made by DoD IG. DLA receives notification after the fact.
Q.66 - IG is responsible for transmitting.
65. Per DoD 5500.7-R, Joint Ethics Regulation, the DoD Component's criminal investigative organization is responsible for filing the Form 202. For DoD IG, the responsible organization is the Defense Criminal Investigative Service (DCIS).
61. HHS provides waivers to OGE on a quarterly basis, so the waivers provided to OGE in CY 2015 include those granted in the 4th quarter of FY 2014 and quarters 1-3 of FY 2015. The waivers granted in the 4th quarter of FY 2015 were provided in January 2016.
54 through 57. DOJ components do not track remedial actions in this manner. 62. The violations may overlap with or involve more than one Subpart of the Standards of Conduct.
#62 and #63 - These numbers came from the Office of the Inspector General. Our office is still waiting on the Human Resources Office to respond to our inquiry.
Note on response to Questions 62a and 63a: The survey we sent to our field offices only asked for the total number of disciplinary actions taken at each location and did not ask for the specific Ethics provision(s) cited as the basis for the disciplinary actions. we will revise our survey for next year.
Q58: All four 208(b)(1) waivers were granted to MARAD Merchant Marine Academy professors based on small amounts of royalties earned for textbooks written by the professors that are used by the Academy.
62 - 64. The "0" is a placeholder. The Office of General Counsel does not centrally track the bases of disciplinary actions taken throughout VA. Disciplinary actions are handled by the Chief Counsel with jurisdiction over the facility where the employee is located.
65. FCSIC does not have an IG.
Questions 54 through 57: NASA did not have a vehicle to track specific corrective or remedial actions described in these items on an agency-wide basis for the 2015 reporting cycle.
54. and 56. We did not recommend any specific remedial actions, but do not track if filers took any action out of an abundance of caution. 62. There was one Letter of Reprimand and one Cautionary Memo (a lessor action). Both were placed in employee's personnel files. 65. General Counsel is the DAEO.
#64 - the NEA does not have disciplinary actions or criminal prosecutions to track as referrals to the DOJ.

Q.65. At NEH the DAEO is the General Counsel.
Question 62: this answer is subject to amendment with the breakdowns by code section.
#62 There were 7 investigations initiated by the NLRB IG in 2015. As a result of those investigations, 8 employees were disciplined for various violations of The Standards of Conduct. One employee violated both Subpart G and H.
Re: 59 - copies of waivers are being mailed to OGE.
58/59 - One 208(b)(1) waiver granted to 450 filer and one waiver granted to a non-financial disclosure report employee
[N]otification by letter.
Question 62: In 2015, the Ethics Program partnered with HR and the OIG to ensure timely notification of ethics violations. As a result, the number of violations reported on this year's annual questionnaire is significantly higher than 2014 questionnaire submitted by TVA. Question 66.: The U.S. Attorney's Office did not consider this matter to be an ethics case.
#62 One employee was disciplined for violating both subpart E and subpart G.

74. Does your agency have written policies or procedures for designating SGE status? **Table 29**

By statute.
All Commission Members are SGEs
SGE status granted by Presidential appointment.
The Commissioners were designated as SGEs when they were nominated for the position. We are a FACA Commission with half of the Commissioners appointed by the President, half by Congress.
Commissioners were determined to be SGEs by DOJ. No policy is needed.
All of the Commissioners and Committee members are part time employees that clearly meet the definition of SGEs. There is no need for written procedures or ongoing reviews other than to track the numbers of days worked, which we do on a bi-weekly basis.
SGE status is designated by enabling legislation, 201 USC C 66.
Designation of SGEs determined using guidance provided by OGE and pursuant to 18 U.S.C. §202.
By statute.

75. Does the written policy or procedure include consultation with the ethics office? **Table 30**

Public Board members are SGEs by statute.
All ACUS non-government members automatically become SGEs per agency bylaws.
By statute.
This does not apply to CECANF.
There is no written policy at this time, but ethics office determines SGE status.
The agencies do not employ SGEs other than Commissioners who have been determined as SGEs by DOJ.
Our agency does not have written policy or procedures.
There is not a written agency policy.
We have no written policy. Our SGEs are designated by Statute.
The General Counsel/DAOE is involved in reviewing the status of all Commissioners and Committee members relative to the 60 and 130 thresholds. No formal policy is needed.
SGE status is designated by enabling legislation, 201 USC C 66.
No written policy (follow OGE guidance), but SGEs are included in the agency's ethics program.
Since we do not have a written policy or procedure, this question is not applicable to OPIC.
No written policies/procedure for designating SGE status, but HR may consult with ethics office.
No policy/procedure.

By statute.
There is no written policy.

77. If yes, which office provides the training? **Table 31**

Office of General Counsel.
General Counsel/DAEO/ADAEO..
Office of General Counsel. All new SGEs get an annotated ethics booklet (annotations by OGC).
DAEO.
The ADAEO is responsible for disseminating/training of new SGEs, but we had none in 2015.
The agency's Ethics Office.
Contractor.
CECANF.
74. Designated by statute. 77. The DAEO has provided the ethics training (did not happen in CY2015).
OGC (DAEO).
General Counsel.
DTRA is currently developing training for SGEs who serve on committees or participate in board mtgs.
General Counsel.
The USDA Office of Ethics.
Ethics Law and Programs Division
Ethics office.
Ethics Staff
Ethics office.
Ethics Office.
Ethics office and appointing office.
Ethics office.
#76 There is online training available for SGEs.
The assigned legal advisor/Ethics counsel for each Board.
The legal office for the command or agency that oversees the committee or board.
The servicing ethics counselor.
Ethics.
Chief Counsel or Office of General Counsel.
[O]nline training.
EEOC provides SGEs with a written summary of the ethics restrictions.
OGC Ethics Department.
General and Administrative Law Office.
Ethics Office.
Ethics office and Office of Human Resources.
Office Of General Counsel (DAEO/Ethics Officials).
The General Counsel's Office.
The DAEO provides the training with guidance from the OGE desk officer.
Done by the DEAO.
Ethics Office.
General Counsel.
Attorneys from the Ethics Office.
Ethics office.
Office of General Counsel (General Counsel is the DAEO).
Office of General Counsel (DAEO is General Counsel and ADAEO is Assistant General Counsel).

Ethics Office/Office of the General Counsel.
Office of Legal Affairs.
Ethics Office provides written materials. Managing Program Officials provide verbal COI overview.
Administrative Law & Ethics Office.
Office of the General Counsel.
DAEO.
OGC.
Office of General Counsel.
DAEO/ADAEO.
The DAEO provides the training.
Office of the General Counsel.
Ethics office.
General Counsel.
Designated Agency Ethics Official and Alternate Designated Ethics Official conduct the training.
Office of General Counsel.
Ethics Office.
The DAEO provides training to SGEs at their orientation.
Ethics Office.

ADDITIONAL COMMENTS FOR PART 11. Please indicate the question number to which the comment corresponds. **Table 32**

None.

Table 32

ADDITIONAL QUESTIONNAIRE COMMENTS Table 33

It would be very helpful if this form was updated. The formatting is often cumbersome (especially the tables, where entry of zeros is mandatory for blank fields), better integration of skip logic, and some questions could be worded more precisely. (For example, on occasion, I could not tell if a question related to all agency staff, or only certain agency staff (such as SGEs). Thank you.
When the first answer in a question/chart is zero, it's absurd to then have to type in zeroes in the succeeding questions.
#67. Our Advisory Committee met in February 2015 and was terminated in April 2015 after it provided its final recommendations to our agency.
Responses to Questions 68-71 are classified and will only be provided to cleared OGE personnel upon request.
General: During the calendar year, the office lost the incumbent DAEO went on leave suddenly for several months and was unavailable. He then retired. The new DAEO, ADAEO, and a deputy ethics officials suddenly were thrust into the role of assuming ongoing responsibilities and piecing together information to respond to this questionnaire. The ADAEO coordinated this effort, and we believe we have answered these questions to the best of our ability. If we were unable or not sure how to respond based on a lack of information, we do indicated either in the response or in a supplemental comment. For example, questions 38 and 40 were answered to the best of our knowledge. question 6: DAEO has supervisory authority over one of the employees listed in response to question 5, but not the other. There was insufficient space to include full address. The final part of the address for the CSB address is: Washington, DC 20006 For the full address of the IG, call (202) 566-2391.
Question #22 - Additional comments will be submitted via email because they do not fit in the allotted space here. (1) Transition and Leadership Changes The Commission is a small agency with 44 employees. Political appointees make up 17 of the 44 positions, which is almost 39% of the agency. The political staff consists of

eight Commissioners (part-time term appointments), the Staff Director (a Presidential appointee, who is the administrative head of the agency), as well as eight Special Assistants (Schedule C employees), one for each Commissioner. During November and December 2016, four of the Commissioners terms will end at which time their four Special Assistants terms end too. At the end of the current Presidential administration in January 2017, the Staff Director's appointment will end. Therefore, within a year, nine out of 17 political positions will end. Accordingly, the Commission, including the ethics program, will face major transition.

Questions 67 to 70: In calendar year 2015, the CFPB was not subject to FACA, but as a best practice it adopted a policy to comply with the transparency and reporting provisions in most situations. During 2016, CFPB's advisory boards and committees will be subject to FACA as a result of a statutory change. Questions 76 and 77: Members of the CFPB's advisory boards and committees are not SGEs. Nevertheless, all committee and board members receive training, including ethics training, from the Legal Division, FOIA Office, and Records Management Office.

#23 comment section did not allow me to type in the complete explanation. CSOSA OHR Department reported that some employees did not attend their quarterly session so their enrollment rolled over to the next quarter. PSA reported that an error on their part did not assign some employees to their training, but the issue was resolved. One PSA employee resigned before their scheduled training.

Chief Human Capital Officer Mailing Address: Department of Commerce Office of the Secretary Office of Human Resources Management 1401 Constitution Avenue, N.W. Room 5026 Washington, D.C. 20230.

1. Mr. Glenn A. Fine Acting Inspector General Department of Defense 4800 Mark Center Drive, Suite 15G27 Alexandria, VA 22350-1500 2. Mr. Henry C. Shelley, Jr. General Counsel / DAEO DoD, Office of Inspector General 4800 Mark Center Drive, Suite 15K26 Alexandria, VA 22350-1500 3. Mr. Gary Brinner Director, Human Capital Management DoD, Office of Inspector General 4800 Mark Center Drive, Suite 10A26 Alexandria, VA 22350-1500 4. Mr. Glenn A. Fine Acting Inspector General Department of Defense 4800 Mark Center Drive, Suite 15G27 Alexandria, VA 22350-1500.

Agency Head: The Honorable Sylvia Mathews Burwell Secretary U.S. Department of Health and Human Services 200 Independence Avenue, SW Washington, DC 20201 DAEO: Elizabeth J. Fischmann Designated Agency Ethics Official Room 710-E, Humphrey Building 200 Independence Ave, SW Washington, DC 20201 Chief Human Capital Officer: John W. Gill Chief Human Capital Officer 200 Independence Ave., SW, Room 801 Washington, D.C. 20201 Inspector General: The Honorable Daniel Levinson Inspector General Department of Health and Human Services Room 5250 Cohen Building 330 Independence Avenue, SW Washington, DC 20201.

Part5/Q21 (cont.)Accomplishments: ethics officials staffing changes in 2015 occurred without a loss of service quality in advice. New ethics officials received in-depth training in the component and through DEO. Additional notable accomplishments: ATF: new Ethics Order [and] BOP: new Ethics Newsletter, DEA: new post-employment Questionnaire, significantly enhancing advice and training on post-government restrictions to departing employees, EOUSA: Conference for more than 100 ethics advisors with speakers from OGE & OSC,DEA & OJP: enhanced outside activity approval with new processes and tracking, USMS: new e-filing system for confidential financial disclosure, CRM: new independent monitor policy, enhanced training for overseas employees.

Many of the reports narrative boxes had a character limitation that prevented us from including all the information we wanted to present.

Inspector General, Department Of The Navy 1254 Ninth Street SE Washington Navy Yard, DC 20374-5006.

Agency Head: The Honorable Janet L. Yellen Chair, Board of Governors of the Federal Reserve System Mail Stop 45 20th St and Constitution Ave, NW Washington, DC 20551 DAEO: Cary Williams Designated Agency Ethics Official Board of Governors of the Federal Reserve System Mail Stop 3 20th St. and Constitution Ave, NW Washington, DC 20551 CHCO: Tameika Pope Chief Human Capital Officer Board of Governors of the Federal Reserve System Mail Stop K-146 20th St. and Constitution Ave, NW Washington, DC 20551 IG: Mark Bialek Inspector General Board of Governors of the Federal Reserve System Mail Stop K-300 20th St. and Constitution Ave, NW Washington, DC 20551.

#68/#69 At the end of CY 2015, we had only three (3) FACA advisory committees because one of them

Government wide Travel Advisory Committee (GTAC) terminated. Fifteen of the 64 advisory committee members were members of the GTAC.

The field for CHIEF HUMAN CAPITAL OFFICER is pre-populated with the data for the AGENCY HEAD, Charles F. Bolden Jr., and the submission system does not permit it to be changed. NASA's Chief Human Capital Officer is Lauren Leo, Associate Administrator for Human Capital, rather than Mr. Bolden.

ADAEO, Office of the General Counsel Office of Administration Executive Office of the President 725 17th St. NW Washington, DC 20503.

Many of the comment boxes appear to limit the number of characters, such as the box for the IG mailing address.