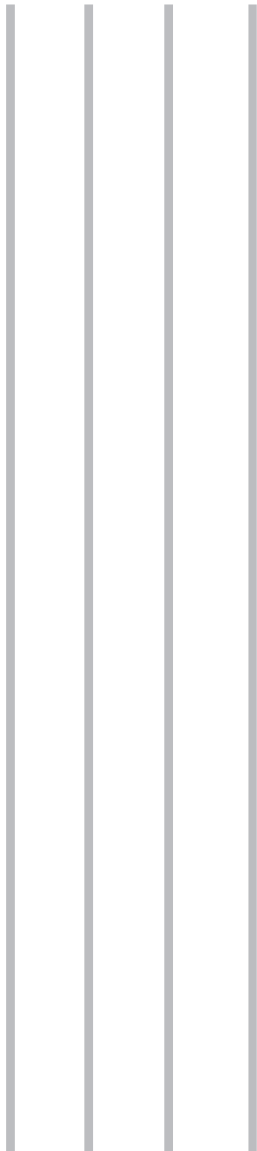


CONGRESSIONAL
BUDGET JUSTIFICATION,

ANNUAL

PERFORMANCE PLAN



PREPARED FOR THE COMMITTEE
OF APPROPRIATIONS

FEBRUARY 2018

2019

UNITED STATES
OFFICE OF
GOVERNMENT
ETHICS

MISSION

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

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UNITED STATES OFFICE OF GOVERNMENT ETHICS

Section I – About OGE

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

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

Institutional Integrity in the Executive Branch

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



Figure 1: Institutional Integrity

includes merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement. Potential violations of legal authorities established under this framework, including government ethics authorities, are primarily investigated by the thousands of Inspectors General staff members across the executive branch. In addition, the Department of Justice has enforcement authority that includes both civil and criminal penalties.

Within this framework, the ethics program works to ensure that public servants impartially carry out the governmental responsibilities entrusted to them, and that they serve as good stewards of public

resources. Toward these goals, the mission of the ethics program centers on preventing conflicts of interest and the appearance of conflicts of interest that stem from financial interests, business or personal relationships, misuse of official position, official time, or public resources, and the receipt of gifts.

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

OGE and Executive Branch Agencies

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



Figure 2: OGE and the Executive Branch

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

How OGE Provides Leadership and Oversight

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

- promulgates, maintains, and advises on enforceable standards of ethical conduct for the nearly 3 million employees in over 130 executive branch agencies, including the White House;
- oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers;
- ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations;
- provides education and training to the nearly 5,000 ethics officials executive branch-wide;

- conducts outreach to the general public, the private sector, and non-governmental organizations; and
- provides technical assistance to Congress, state, local and foreign governments, associations, and international organizations.



*The Program Counsel also serves as the Chief of Staff and is the designated First Assistant

Figure 3: OGE Organizational Chart

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

OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, and other key personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate.¹ As shown in the

¹ The position of Director of OGE is currently vacant. The General Counsel was appointed by the President to serve as Acting Director.

Long-Term Strategic Goals

When government decisions are made free from conflicts of interest, the public can have greater confidence in the integrity of executive branch programs and operations. The four strategic goals of OGE’s strategic plan for fiscal years 2018 through 2022 – uniformity, accountability, continuity, and engagement – reflect the long-term outcomes that OGE strives to achieve in order to prevent and resolve conflicts of interest. OGE’s budget priorities for fiscal year 2019 support achievement of these strategic goals.

In order to develop meaningful strategic goals, OGE sought feedback from internal staff, Congress, executive branch ethics officials, non-governmental organizations, and the public. OGE incorporated feedback received from these groups into its strategic plan and performance documents. OGE’s daily work is driven by the strategic objectives and performance goals established under each of the overall strategic goals set forth below.

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

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

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

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

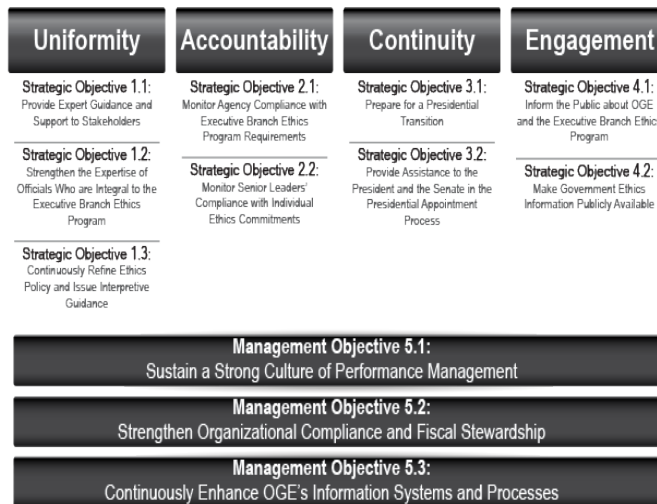


Figure 4: Strategic Goals and Objectives Framework

Starting on page 9, this document describes the specific work OGE will undertake in fiscal years 2018 and 2019 to achieve each of these long-term strategic goals. Appendix A describes the performance goals OGE will use to measure progress toward achievement of its strategic objectives.

Section II – Budget Request Overview

Appropriations Language

OGE proposes the following appropriations language: “For necessary expenses to carry out functions of the Office of Government Ethics pursuant to the Ethics in Government Act of 1978, the Ethics Reform Act of 1989, and the Stop Trading on Congressional Knowledge Act of 2012, including services as authorized by 5 U.S.C. 3109, rental of conference rooms in the District of Columbia and elsewhere, hire of passenger motor vehicles, and not to exceed \$1,500 for official reception and representation expenses, \$16,294,000.”

Budget Request Overview Narrative

In recognition of the budget constraints on available executive branch agency funding, OGE is submitting a budget request of \$16,294,000, a decrease over its fiscal year 2018 budget request. Despite significant increases in workload based on public and other stakeholders’ interest in its important work leading and exercising oversight of the executive branchwide ethics program, OGE’s request largely maintains overall fiscal year 2016 expenditure levels. Beyond this baseline, OGE is limiting its request to the funds necessary to modernize and staff the systems vital to OGE’s work to support the President’s constitutional duty to nominate Senate-confirmed appointees.

OGE’s work in support of the nominations process is among its most important. Based on the current pace of nominations and confirmations, OGE’s work in this area will continue to be in high demand well into fiscal year 2019. OGE’s accomplishment of this valuable work depends on its expert staff and well-functioning information systems. In particular, OGE requires the requested funds to implement necessary architecture upgrades to OGE’s *Integrity* application at \$347,000 and provide the needed personnel support required for continued efficient operations and OGE’s plan for succession at \$124,000. Without this new architecture and personnel support, *Integrity* will continue to degrade and become inadequate to support the needs of its users or to comply with evolving security and operational requirements.

At this funding level, OGE will carefully prioritize its mission work in order to ensure that its critical functions, in addition to its important work on the nominations process, are performed. OGE’s important statutory responsibilities include promulgating and maintaining enforceable standards of ethical conduct for the nearly 3 million employees in over 130 executive branch agencies and the White House; overseeing a financial disclosure system for more than 26,000 public and 380,000 confidential financial disclosure report filers; ensuring agency ethics programs are in compliance with applicable ethics laws and regulations; providing education and training to the more than 5,000 ethics officials; conducting outreach to the general public; and providing assistance to state, local, and foreign governments and international organizations. In fiscal year 2019, OGE will need the full complement of its requested resources to support these responsibilities,

recognizing that tradeoffs and shifts in mission priorities will still be necessary. OGE will continue to be a strong fiscal steward of taxpayer dollars, as evidenced by already having taken full advantage of the efficiencies and cost savings associated with the use of shared services, space consolidation, and streamlined operations. OGE will also continue to explore agency reforms with the goal of reducing burden, increasing efficiency, and improving operations.

Requested Funding is Necessary to Undertake Core Mission Work and to Ensure that *Integrity* Continues to Operate Securely and Effectively

In addition to its other mission-critical work, OGE expects to have an unprecedented nominee-related workload for the third year of an administration in fiscal year 2019, which will demand significant staff and system resources. The current pace of the Administration's recruitment of candidates for nomination to Senate-confirmed positions virtually ensures that OGE's work related to filling important administration positions will continue well into fiscal year 2019. In addition, a low rate of confirmations by the Senate results in a significant surge of re-nominations that further adds to OGE's workload. Moreover, the complexity of the financial interests of nominees and appointees significantly adds to the work of reviewing their financial disclosure reports and helping them resolve identified conflicts of interest. The only surge capacity that exists to do this highly sophisticated analysis is found within OGE's professional staff and in reliance on *Integrity*, OGE's executive branchwide electronic filing system.

Integrity, OGE's secure, web-based system for the collection and review of public financial disclosure reports developed pursuant to requirements in the STOCK Act of 2012, has been critical to Presidential transition efforts. The system has been seamlessly adopted and well-rated by the new Administration for its highest-level nominees. The system improves filing accuracy by eliciting commonly omitted information through context-dependent questions relevant to the filer. It also contains features that increase the efficiency of the review and certification of these publicly available reports. The system significantly improves OGE's ability to carry out its important responsibilities to support the President's constitutional duty to nominate and appoint officers to the highest positions in the executive branch.

In recognition of the significant resource constraints facing the government, OGE is reducing by 50% the operational staff maintaining *Integrity* in order to prioritize its request for resources to make necessary changes to the system's architecture and to fill a critical position that supports the system. However, in order to operate *Integrity* securely and efficiently across every agency in the executive branch, OGE requires \$347,000 in fiscal year 2019 to implement a new architecture of *Integrity's* system platform and \$124,000 to fill a critical system-related vacancy. The revised system architecture is necessary to increase the number of system servers. This prevents diminishing system speed, ensures reliable user access, and strengthens user authentication protocols to improve security and reduce risk. Funding the currently vacant position in direct support of the *Integrity* program is necessary to ensure there is a capable successor to the sole OGE employee with full-time responsibility for the system.

Notably, even with the requested funds, OGE must defer modifications and maintain only the minimum engineering support necessary to keep the system in an operational status. And, despite maximizing efficiencies through shared services, the baseline costs for the services OGE procures, including those for *Integrity*, continue to rise each year. In sum, the requested funds reflect significant tradeoffs and represent the minimum necessary to ensure the ongoing use, viability, and security of this executive branchwide system that directly serves the highest-level government officials and the President's constitutional appointment power.

CONCLUSION

OGE respectfully requests fiscal year 2019 funding of \$16,294,000 which is the minimum funding needed to ensure that OGE can carry out its basic functions and meet its important mission of preventing conflicts of interest in the executive branch. In particular, in fiscal year 2019 OGE must resource its mission-critical functions, including the staff and systems necessary to ensure that the complex financial disclosure reports of Presidentially appointed, Senate-confirmed (PAS) nominees are properly reviewed to identify and resolve financial conflicts of interest, and promptly delivered to the U.S. Senate for consideration so that critical leadership vacancies may be filled.

Budget Request by Object Classification

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

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

Object Class	2017	2018	2019
	<u>Enacted</u>	<u>Annualized CRA Level</u>	<u>Requested</u>
11.1 Salaries	\$8,873	\$8,782	\$8,946^a
12.1 Benefits	\$2,728	\$2,626	\$2,766
21.0 Travel	\$50	\$10	\$3
22.0 Transportation (Freight)	\$2	\$2	\$2
23.1 Rental Payments to GSA	\$1,323	\$1,337	\$1,351
23.3 Communications and Utilities	\$125	\$114	\$122
24.0 Printing and Reproduction	\$19	\$66	\$62^b
25.2 Other Services	\$2,829	\$2,674	\$2,924
26.0 Supplies and Materials	\$100	\$93	\$84
31.0 Equipment	\$41	\$277^c	\$34
99.0 Subtotal	\$16,090	\$15,981	\$16,294
99.0 Reimbursable	<u>\$725</u>	<u>\$725</u>	<u>\$725</u>
99.0 Totals	\$16,815	\$16,706	\$17,019
FTEs	68	70	71

^a Reflects 11% vacancy rate and no assumed pay raise.

^b Reflects expected printing and publishing of statutory and regulatory materials; and notices in the *Federal Register* for key strategic and mission-critical revisions to ethics regulations.

^c Includes partial funding toward a 4-year life-cycle information technology infrastructure replacement necessary for security and network reliability.

Section III – Fiscal Years 2018 and 2019 Performance Plan

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

Organized by strategic goal and objective, this section describes OGE's planned work for fiscal years 2018 and 2019. Information on how OGE will measure progress toward achieving its strategic goals in fiscal years 2018 and 2019 can be found in Appendix A.

STRATEGIC GOAL



ADVANCE A STRONG, UNIFORM EXECUTIVE BRANCH ETHICS PROGRAM

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

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

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



Strategic Objective 1.1: Provide expert guidance and support to stakeholders

In fiscal years 2018 and 2019, OGE will continue to provide quality Desk Officer services, and effective assistance to a wide variety of key stakeholders including Congress and Inspectors General. OGE will also continue to share relevant information and to create opportunities for ethics practitioners to engage with OGE and each other. Key highlights of OGE's planned work are described below.

Assist and support agency ethics officials

OGE will continue to provide necessary support to agency ethics officials so they can provide uniform and effective ethics guidance to nearly 3 million federal employees in the executive branch who, in turn, serve the American people. This support includes timely, expert advice on applying the ethics laws and regulations as well as other information ethics practitioners need to do their jobs effectively. On average, OGE Desk Officers respond to 1,800 calls for assistance per year often with the General Counsel and Legal Policy Division's assistance (see page 14). Desk Officers also will meet personally with agency ethics officials in order to strengthen their knowledge and professional relationships, on average visiting 20 agencies per year. OGE will continue to use its Agency Information Management System (AIMS) to gain insights about agencies' ethics support needs, and to better tailor the support OGE provides. For example, OGE will continue to use data in AIMS to identify the topics of agencies' questions in order to recommend and provide relevant OGE training offerings. AIMS data increases the ability of OGE to provide useful, consistent, direct support to executive branch agencies.

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

OGE will continue to ensure that ethics officials are aware of and have access to the most up-to-date ethics information. OGE will achieve this by posting legal and program advisories and other guidance in a searchable format on its website, and providing notices of new guidance via its listserv, which reaches approximately 3,500 recipients. OGE also will continue to host its regularly scheduled quarterly meetings with senior agency ethics officials.

OGE will continue to consult with agency ethics officials, non-governmental organizations, academic experts, and other stakeholders when developing new policy. Specifically, OGE will continue its practice of seeking input from the ethics community as part of the process of drafting legal advisories. Experience has shown that such outreach leads to the creation of more effective ethics guidance and fosters greater understanding and commitment on the part of the ethics community.

Integrity Support

OGE will continue to support agencies' use of *Integrity*, OGE's executive branchwide electronic public financial disclosure filing system. Use of the system is expected to expand beyond the more than 14,000 filers currently using the system and to continue to be fully

adopted for filing by the highest-level executive branch officials. OGE will continue to provide necessary help desk services and user resources including written, online tools, and live orientations and training. Additional information about *Integrity* can be found on page 29.

Respond to requests for technical assistance

OGE will also continue to provide advice and assistance in response to requests for government ethics expertise from a variety of stakeholders outside of the executive branch ethics community, such as Congress, professional associations, non-governmental organizations, academia, state and local governments, and employee groups, to build a better understanding of the executive branch ethics program. Last year, OGE responded to over 200 requests for such assistance.

Support the vital work of the ethics enforcement communities

OGE will continue to support the vital work of the ethics enforcement communities, which include Inspectors General and employee relations personnel, who are responsible for holding agency employees accountable for abiding by the ethics laws. To support them, OGE will continue to respond to requests for assistance. OGE also will continue to train and collaborate with members of the enforcement communities. OGE plans to invite members from these communities to participate in the next National Government Ethics Summit (see page 13 for additional information). OGE will also continue to provide training as part of the Inspector General Criminal Investigator Academy's Public Corruption Investigations Training Program. Further, OGE will continue to participate actively in the work of the Council of Inspectors General on Integrity and Efficiency (CIGIE).

Support United States foreign policy initiatives

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

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

In fiscal years 2018 and 2019, OGE will continue to focus on strengthening the expertise of officials who are integral to the executive branch ethics program. Key highlights of OGE's planned work are described below.

Professional development for ethics officials

OGE will also support the performance of ethics officials by maintaining and growing a library of on-demand training courses covering topics such as the ethics laws and regulations, ethics program management, enterprise risk management, and behavioral insights for ethics program leaders. OGE will additionally conduct targeted, intensive training for ethics officials in critical roles and will hold larger symposia and similar events to create opportunities for ethics officials to share experiences and lessons learned.

OGE will also provide tools to ethics officials to support ethical culture within their agencies. Through publications, distance learning events, in-person workshops, and symposia, OGE will share research, model practices, and techniques for developing and supporting ethics within organizational cultures. OGE will also share model practices for ethics officials' engagement with agency leaders, program managers, and staff. For example, OGE will effectively support agency ethics programs efforts to assist with agency risk management, performance planning, and measurement.

Encourage and support ethical leadership throughout the executive branch

Ethical culture begins with ethical leadership throughout an organization. OGE will seek more opportunities to engage agency leaders on the importance of ethics and to sensitize federal managers to ethics issues. OGE will engage with senior leadership directly and indirectly through its external communications, its involvement in nominee financial disclosure reports and ethics agreements, its publications, and its education program. For example, OGE will send a memorandum to agency heads about the importance of ethical leadership and will highlight examples "Leadership in Action" on its Twitter account. Through on-going research and partnerships with others, OGE will discover and share tools and tactics for leaders to use to effectively communicate the ethical expectations for their organizations.

Given that ethics is an integral part of how agency decisions are made and agency work is performed, OGE will work with ethics officials and program managers to ensure that program areas with heightened risk for conflicts of interest and other ethical concerns are adequately prepared to identify ethical risks. OGE will also support agency efforts to ensure that supervisors and managers are trained to assist in conflicts spotting and ethical awareness building within their organizational units.

Hold the National Government Ethics Summit

In fiscal year 2019, OGE expects to hold its third National Government Ethics Summit (Summit). By leveraging federal space and expertise of ethics practitioners from within and outside government, OGE will continue its approach of providing an intensive, multi-day training event at virtually no cost. OGE designed the Summit concept to strengthen the executive branch ethics program and provide attendees with opportunities to deepen their knowledge of the ethics rules, share lessons learned through extensive practical experience, listen to viewpoints from outside government, and build connections

with ethics officials who can assist in resolving even the most complex ethics issues. Coming at the end of a full transition, the Summit will bring together hundreds of executive branch ethics officials and external stakeholders, including officials from the other branches of the federal government, Inspectors General staff, members of the press, and advocates from good government groups, to collaborate and share lessons learned.

Providing resources to support an ethical federal workforce

OGE recognizes that maintaining ethical standards across the executive branch is the shared responsibility of every employee who takes the oath of office. To support the ethical service of all executive branch employees, OGE will maintain a collection of training resources for new and current federal employees, share model practices for communicating about ethics within organizations, and leverage opportunities to directly discuss ethical standards with groups of federal employees.

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

Ethics regulations serve as the building blocks of the executive branch ethics program. OGE reviews, revises, and issues interpretive guidance on the ethics rules and regulations to ensure their continued effectiveness and applicability to situations faced by employees in a 21st century government. In fiscal years 2018 and 2019, OGE will continue to work on modernizing its ethics regulations to ensure their continued effectiveness and applicability. OGE will also continue to issue supplemental agency ethics regulations in consultation with individual executive branch agencies and provide timely legal and program guidance. Key highlights of OGE's planned work are described below.

Provide timely legal and program guidance

Although OGE's primary focus during fiscal year 2018 will continue to be reviewing nominee financial disclosure reports and negotiating ethics agreements to support the Presidential transition, in addition to individual consultations, OGE plans to issue legal and program advisories, as needed, to provide further interpretive guidance about the ethics laws and regulations. In developing these advisories, OGE will continue to draw upon the expertise of agency ethics officials by consulting with key members of the ethics community. OGE's guidance enables ethics officials to provide more uniform implementation of the ethics program executive branchwide and provide consistent guidance to their employees, thereby reducing agency risk. OGE will use its email listserv, website, desk officers, and training broadcasts to provide information about new advisories.

Publish final and proposed rules

In fiscal year 2018, OGE expects to continue its work to modernize the Standards of Conduct by publishing a proposed regulation. In addition, pursuant to Executive Order

13770, OGE plans to issue a notice of proposed rulemaking extending the lobbyist gift ban to all federal employees in fiscal year 2018. In fiscal year 2019, OGE plans to finalize amendments to its regulations governing executive branch financial disclosure systems, the certification and use of qualified trusts, and the issuance of certificates of divestiture.

In fiscal year 2018, OGE will also begin an in-depth review of the existing regulation governing financial disclosure conflict of interest exemptions. OGE expects to draft and publish a proposed regulation modernizing these rules in fiscal year 2019. In fiscal year 2018 and again in fiscal year 2019, OGE plans to publish a final rule implementing inflationary adjustments to each of the five civil monetary penalties provided in the Ethics in Government Act. Finally, in fiscal years 2018 and 2019, OGE will continue to consult with agencies to publish agency-specific supplemental ethics regulations and separate component designations that tailor ethics program requirements to meet specific agency needs.

STRATEGIC GOAL



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

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

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

(2.1) Monitor agency compliance with executive branch ethics program requirements; and

(2.2) Monitor senior leaders' compliance with individual ethics commitments.

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

OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at individual agencies, as well as to identify executive branchwide trends. In fiscal years 2018 and 2019, OGE will continue to conduct reviews of agency ethics programs, collect data about each agency's program and the overall executive branch ethics program, monitor agency leaders' compliance with their ethics agreements, and provide a second-level review of the most senior officials' financial disclosure reports. Key highlights of OGE's planned work are described below.

Conduct program reviews

As part of OGE's strategy to maintain high standards of accountability and compliance with applicable ethics requirements throughout the executive branch, in fiscal year 2018 OGE will begin a new five-year cycle of conducting a program review of every agency in the executive branch. OGE plans to update its review procedures to ensure they incorporate recent regulatory changes governing how an agency ethics program should be administered.

In fiscal years 2018 and 2019, OGE will conduct program reviews through a combination of plenary reviews and inspections. Generally, OGE conducts plenary reviews at Cabinet-level departments and at the largest executive branch agencies. Inspections are largely limited to smaller agencies, but also serve as effective risk management tools for agencies of any size. If an inspection identifies systemic risks associated with an agency's ethics program, OGE will determine whether it is necessary to conduct a subsequent plenary review to further assess and mitigate those risks. OGE will conduct appropriate follow-up reviews to evaluate agencies' progress in implementing any recommendations made by OGE in its program review reports.

In fiscal years 2018 and 2019, OGE will continue to use the program review process to identify model practices. OGE will share these practices with the executive branch ethics community during program reviews, through the Desk Officer Program, and at the next National Government Ethics Summit. (For more information on the Summit, see page 13.) By sharing innovative strategies already in place at another agency, OGE can use the program review process to improve the executive branch program as a whole.

Collect and analyze program data from executive branch agencies

In fiscal years 2018 and 2019, OGE will continue to collect and analyze data about the executive branch ethics program. OGE will use information collected through responses to the Annual Agency Ethics Program Questionnaire to evaluate the executive branch ethics program. With regard to this data set, OGE will continue to share key highlights and the full set of raw data with the ethics community and the public on its website. Beyond the Annual

Questionnaire, OGE will, as necessary, continue to request ethics program data from agencies to address current issues that require oversight.

OGE will make efforts to analyze existing program data collected by OGE to understand the potential risks at an individual agency. This information could inform a program review and help target areas in need of evaluation.

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

OGE monitors senior government leaders' compliance with individual ethics commitments to ensure that executive branch officials conduct the government's business impartially. Key highlights of OGE's planned work are described below.

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

OGE will continue working to ensure that executive branch leaders appointed by the President and confirmed by the Senate (PAS) remain free of conflicts of interest after taking office. In fiscal year 2018, OGE anticipates a significant volume of ethics agreements resulting from the influx of new senior leaders due to the Presidential transition in 2017 and 2018. OGE will continue to monitor the timely compliance by PAS officials with their commitments to resolve conflicts of interest as reflected in their ethics agreements. In fiscal year 2017, OGE strengthened the process for reporting and monitoring compliance with ethics agreements by making it more uniform and transparent. OGE adopted a Certification of Ethics Agreement Compliance (Certification), which requires appointees personally to attest to their ethics agreement compliance. In an effort to make more ethics documents available to the public, OGE will continue the practice it started in fiscal year 2017 of posting these certifications on its website.

OGE will also continue to collect and review the annual, termination, and periodic transaction reports of PAS filers to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements. OGE will continue to use its Financial Disclosure Tracking System (FDTS), a critical tool in management of one of its core mission functions. This application enables OGE staff to access financial disclosure records, reports, supporting documentation, and correspondence relevant to a filer through a single application. OGE uses the application to monitor receipt, review, and retention of required public financial disclosure reports and related documents.

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

The primary criminal conflict of interest law, 18 U.S.C. § 208, requires an employee to be disqualified ("recused") from a particular matter if it would have a direct and

predictable effect on the employee's own financial interests or on certain financial interests that are treated as the employee's own, such as those of the employee's spouse or a prospective employer. In some cases, a waiver to these restrictions may be appropriate. OGE will continue to consult with agencies prior to the issuance of such waivers and collect copies of final waivers.

STRATEGIC GOAL



CONTRIBUTE TO THE CONTINUITY OF SENIOR LEADERSHIP IN THE EXECUTIVE BRANCH

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

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

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

Strategic Objective 3.1: Prepare for a Presidential Transition

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

Participate in meetings, develop training plans, and review resources

In fiscal years 2018 and 2019, OGE anticipates participating as a member of working groups focused on how to prepare and improve future transitions. OGE will develop and implement a comprehensive training plan for OGE staff to build internal capacity to handle the surge in volume of nominee financial disclosure reports associated with a transition. OGE will also develop plans for training agency ethics officials on nominee financial disclosure. In addition, OGE will review and update key resources such as the Nominee Ethics Guide, the Transition Guide, the Ethics Agreement Guide, and the Public Financial Disclosure Guide. As part of its review, OGE will seek input from the ethics community. OGE will refine and streamline internal processes based on its experience from the 2017 Presidential transition. Lastly, in fiscal year 2019, OGE will work with Presidential campaigns on candidate financial disclosure reports.

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

Following a Presidential election and throughout an administration, OGE continuously assists the President and the Senate in the Presidential appointment process. OGE provides an independent review of the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch: Presidentially appointed, Senate-confirmed nominees, and candidates for the Offices of the President and Vice President. OGE will continue to work with the White House and executive branch agencies to make sure that these individuals have complied with the extensive requirements for financial disclosure under the Ethics in Government Act. When potential financial conflicts of interest are detected, OGE will identify remedies to resolve them so that the President's appointees can carry out their duties free from those conflicts.

OGE's review of nominees' disclosures presents a critical opportunity to evaluate their financial interests for potential conflicts of interest and introduces top leaders to the importance of ethical leadership. OGE's staff approaches this function from the perspective of managing risk. To that end, OGE requires nominees to reduce the potential for conflicts in the first place, and OGE prescribes mechanisms for addressing conflicts of interest if issues do arise. In evaluating potential risks, OGE consults with agency ethics officials who

are familiar with their agencies' programs and activities. Based on these consultations, OGE and agency ethics officials prepare an ethics agreement that describes the steps a particular nominee will take to avoid conflicts of interest. After confirming with the agency that there are no unresolved conflicts of interest, OGE transmits the review package, consisting of the financial disclosure form and ethics agreement, directly to the Senate following a Presidential nomination. Key highlights of OGE's planned work are described below.

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

In fiscal year 2018, OGE will continue to use a substantial portion of its staff to analyze and resolve potential conflicts of interest of the highest-level, incoming executive branch leaders. OGE anticipates the volume of reports coming to OGE for review will remain high based on the pace of reports received during fiscal year 2017. OGE will work with agency ethics officials in drafting ethics agreements to remedy identified conflicts of interest. OGE will then monitor compliance with these ethics agreements after the nominees are confirmed (see page 18). In addition, OGE will continue providing agency ethics officials with guidance and instruction to improve their review of financial disclosure reports.

Enhance public financial disclosure process through continued, successful operation of OGE's executive branchwide electronic public financial disclosure system

In fiscal year 2018, OGE will focus on ensuring high quality system operation and support for *Integrity* as heavy use by incoming PAS nominees continues incident to the Presidential transition. *Integrity* produces high quality reports by helping filers report required information easier and more accurately. A combination of data-entry tables and context-dependent questions helps filers identify all of their reportable financial interests and disclose those interests correctly. This feature is particularly important for nominees who, in many cases, are unfamiliar with the financial disclosure reporting requirements. *Integrity* also enables agency ethics officials to more efficiently assign, review, track, and manage reports electronically. The system also allows for quick and easy retrieval of information by authorized users. In addition, because *Integrity* is web-based, users may access the system anywhere over the internet, making accessing the system convenient.

In fiscal year 2019, OGE is seeking fiscal resources to increase system capacity in order to continue with successful operations and to keep pace with increased demand with adequate processing speed and stability. If funded, OGE would migrate *Integrity* from a single server to a multi-server environment to support the projected expansion to as many as 26,000 public financial disclosure filers (over 30,000 total users, including filer designees, spouses, OGE staff, and agency reviewers and administrators). This change will significantly improve user experience across government through increased access speed and stability.

STRATEGIC GOAL

IV

ENGAGE THE PUBLIC IN OVERSEEING GOVERNMENT INTEGRITY

OGE's prevention mission involves engaging the public to inform them about the systems in place to detect and resolve conflicts of interests of their government leaders. This, in turn, allows the public to engage in overseeing the integrity of its government.

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

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

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

OGE informs the public and other key stakeholders about OGE and the executive branch ethics program to raise awareness of the important work of the program. In fiscal years 2018 and 2019, OGE will continue to maintain its external communications efforts to increase understanding of the executive branch ethics program generally and OGE's work, in particular. Key highlights of OGE's planned work are described below.

Communicate more effectively

It is critical that the public have confidence in the impartiality of government decision-making and the systems to detect and resolve conflicts of interest in the executive branch. OGE has a responsibility to communicate effectively about these systems to its stakeholders. OGE has a wide spectrum of stakeholders – from experienced ethics practitioners and government watchdogs to major federal partners and the public. In fiscal year 2018, OGE will continue to ensure that its communications are accurate, compelling, relevant, and tailored to the targeted audience, as well as delivered through effective communication channels. To do so, OGE will continue to use analytics to assess the effectiveness of its communications and to identify and remedy gaps in its outreach.

Collaborate with and engage a broader array of stakeholders

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

To share information and foster valuable collaboration, OGE will also continue to participate as a member of private sector, state, and local ethics organizations such as the Council on Governmental Ethics Laws (COGEL), in addition to federal interagency groups, such as the General Counsel Exchange. OGE will seek opportunities to reach out to and participate in other organizations and groups that share a common interest in OGE's mission, such as the Partnership for Public Service. Through meetings, presentations, and online forums, OGE will also continue to engage and share information with non-governmental organizations, such as good governance groups, watchdog organizations, the academic community, and professional associations. In addition, OGE will continue to collaborate with the most senior ethics practitioners from all three branches of government to discuss issues of common interest and to build valuable relationships among the three branches through regular meetings.

Timely respond to external requests for information and assistance

During fiscal year 2017, OGE saw a significant increase in the number of requests for information and assistance, driven in part by the public's interest in government ethics issues. OGE anticipates that the demand for this information will continue in fiscal years 2018 and 2019. Through such interactions, OGE aims to increase awareness and understanding of the ethics laws and regulations and to disseminate accurate information about the executive branch ethics program. In particular, OGE will further its relationship and information sharing with the media by responding to inquiries and publishing helpful information on its website.

OGE will continue to refine its procedures for responding to and tracking these public interactions. This effort will enable OGE to analyze trends and develop relevant, understandable information to share with stakeholders.

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

To assist the public in understanding OGE's and government ethics practitioners' efforts to support an ethical government, OGE will publish materials, deliver messages, provide data, and conduct training in ways that are more accessible to citizens. For example, OGE will post videos of education events, course materials, publications, and reports on its public website. OGE will provide plain English explanations of key terms and public-friendly content via social media and pages on its website. Where appropriate, OGE will also seek input from citizens on ways the agency can improve ethics outreach throughout government.

Develop and execute comprehensive communication plans

As needed, OGE will develop and execute comprehensive communication plans for significant OGE initiatives, including the planned National Government Ethics Summit (see page 13). The Summit will provide OGE with an opportunity to engage with its stakeholders about its important work, the executive branch ethics program, and the many laws and regulations that govern federal employee conduct. Therefore, it is critical that OGE consider which stakeholders will be interested in the content and how best to reach them.

Strategic Objective 4.2: Make ethics information publicly available

It is important that ethics information be publicly available to assure the American public that decisions made by senior leaders are based on the interests of the public rather than their own personal financial interests. Ethics information includes public financial disclosures, program review reports on agency ethics programs, and written policy guidance. Key highlights of OGE's planned work are described below.

Make Ethics Documents Publicly Available and Accessible

To ensure that ethics information is publicly available and to promote overall transparency in governmental decision-making, in fiscal years 2018 and 2019, OGE will continue to timely post a variety of critical ethics documents on its website. These documents include agency program review reports, policy guidance, information about each agency's ethics program, documentation of senior leaders' compliance with ethics commitments, and financial disclosure reports of high-level officials.

OGE will build upon the efforts made in fiscal year 2017 by directing its efforts toward informing the public about the availability and usability of this information, streamlining the process to access information, and making it easier to navigate and view the data on its website. This effort will include a review of OGE's homepage and other frequently viewed pages to identify changes that would improve the user's experience. Lastly, OGE will continue to identify new data sets that can be made publicly available on its website.

OGE will continue to maintain a strong FOIA program. OGE has experienced a significant increase in the volume of FOIA requests received, driven in part by the public's interest in government ethics issues, which is not expected to decline. To increase transparency and respond to this increased public interest, in fiscal year 2017 OGE began proactively posting on its website documents released in response to FOIA requests that were of particular interest to the public. OGE will continue this practice as part of its process of responding to FOIA requests in fiscal years 2018 and 2019.

Finally, in fiscal year 2018, OGE will publish its revised Open Government Plan. The plan is a public roadmap that details how OGE will incorporate the principles of transparency, participation, and collaboration, which form the cornerstone of an open government.

MANAGEMENT OBJECTIVES

This section describes OGE’s planned work related to its management objectives and the steps OGE will take to maintain a culture of performance. Information on how OGE will measure its progress toward achieving its management goals in fiscal years 2018 and 2019 can be found in Appendix A.

OGE will continue its efforts to maintain a culture of performance in fiscal years 2018 and 2019 through several initiatives. OGE will continue to track its progress toward annual performance goals by holding quarterly all-hands meetings, conducting mid-year strategic objective reviews, holding regular executive and senior staff meetings to discuss agency goals, priorities, and the status of program activities, and holding supervisors accountable for ensuing ongoing communication regarding OGE goals and priorities with all staff. OGE will also continue to implement its new enterprise risk management framework, which includes an agencywide risk assessment process, development of risk mitigation strategies, maintenance of an agencywide risk registry, the assignment of executive risk monitors and integration of risk monitoring into the agency’s performance management process.

Management Objective 5.1: Sustain a Strong Culture of Performance Management

In fiscal year 2018, OGE will continue to incorporate the requirements of the Employee Development Plan (EDP) into employees' performance standards. In this way, OGE solidifies its commitment to continuous learning and employee professional development. OGE will also continue to identify agency knowledge and skills gaps, and will use the EDP to train employees to fill those gaps. In addition, OGE will continue to provide internal and external training and development opportunities to its employees. OGE will also continue to hold regular training sessions for new employees, as well as "Issue Forums" and other meetings for employees within the agency to share information and to develop and improve their knowledge and skills. These actions collectively will ensure the ability of OGE and its employees to offer the highest quality products and services to its stakeholders.

Management Objective 5.2: Strengthen organizational compliance and fiscal stewardship

OGE will continue to strengthen its organizational compliance and fiscal stewardship by continuously evaluating its practices and systems to identify areas in need of improvement. OGE will remain a good steward of taxpayer dollars as reflected by its existing track record of strong financial management. In fiscal years 2018 and 2019, OGE will continue to pursue efficiencies, such as the economies of scale received from using shared service centers for a significant number of support services. As part of this effort, OGE will undertake a thorough evaluation of the cost and quality indicators for its existing agreements for shared services, with the goal of improving the price and quality of the services OGE procures. OGE will also maintain a robust records program and plans to review its various records schedules. In general, OGE will strive to remain compliant with the wide array of requirements applicable to federal agencies.

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

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

Refresh IT infrastructure

OGE must maintain a strong, secure IT infrastructure, which is necessary to allow OGE to conduct its mission-critical work every day. Therefore, OGE must timely upgrade this infrastructure to mitigate the risk of potential failure, to address evolving technology,

and to prevent security breaches. As potential security threats against automated systems grow and become more complex, OGE must remain proactive to ensure that any threats are reduced and mitigated, if not eliminated. In fiscal year 2018, OGE plans to complete a full life-cycle replacement of OGE's information technology equipment, as well as enhance its network security. This crucial effort includes upgrades to OGE's network infrastructure, laptops, and related peripherals and software. All of these services, equipment, and software are necessary for the security and efficiency of OGE's ongoing daily operations. In particular, OGE must ensure a safe and secure IT environment that protects the privacy and integrity of financial information provided to OGE by agency ethics officials and the most senior officials of the executive branch as part of the financial disclosure review process.

Conduct agencywide cybersecurity risk assessment and mitigation plan

In addition to a comprehensive replacement of OGE's IT infrastructure, OGE will undertake a complete assessment of the cybersecurity risks associated with the agency's network, website, and internal applications. OGE will use the results of this assessment to develop mitigation strategies that will be tracked and managed through a Plan of Actions and Milestones (POAM) process. Also, in fiscal year 2018, OGE will schedule an independent, third-party review of its systems and efforts at mitigation to ensure OGE meets cybersecurity compliance targets.

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

Fiscal year 2018 will be a time of significant demand for *Integrity*, and as a result, OGE's focus will remain on steady-state operations, bug-fixing and minimal enhancements. OGE will strive to ensure that the system continues to run reliably for current filers, and continues to efficiently manage the increased number and more complex filings of new PAS nominees who are expected to continue to use the system during the second half of the Presidential transition. OGE will also continue to be responsive to requests by the new Administration for targeted enhancements, and enhancements required to address evolving security requirements. In fiscal year 2019, OGE is requesting funding to invest in a significant change in the architecture of the system to increase the capacity and speed of the system as the number of users increases. (See page 6 for more details).

Maintain Internal Applications and Streamline Data Collection

In fiscal years 2016 and 2017, OGE developed and/or redesigned numerous internal applications that streamlined workflows for agency programs, made data more retrievable, enhanced management practices, and strengthened compliance activities. These applications supported internal operations such as requisition, budget formulation, equipment tracking, as well as major programs, such as the Desk Officer Program and financial disclosure. In fiscal year 2018, OGE will devote resources toward maintaining these various applications, which have become critical to agency operations.

In addition, in fiscal years 2018 and 2019, OGE will explore ways to further streamline and reduce inefficiencies in the collection and posting of ethics information. OGE will seek input from ethics officials on these initiatives. By modernizing the collection process, OGE will both increase efficiency and be in a position to better use the data in support of its oversight, education, and support roles. OGE is continuously looking for ways to leverage technology to improve its program.

Section IV – Conclusion

OGE will use its fiscal year 2019 budget request to support the agency’s important mission of providing leadership and oversight of the executive branch ethics program – a program designed to enable executive branch employees to conduct government business impartially by preventing and resolving conflicts of interest. As demonstrated by the significant accomplishments detailed in its Annual Performance Report for 2017, OGE will use its future funding responsibly to successfully achieve its priorities, objectives, and goals. Further, as amplified in this justification, OGE will employ its fiscal year 2019 resources to make strides toward achieving its strategic goals of advancing a strong, uniform executive branch ethics program; holding the executive branch accountable for carrying out an effective ethics program; contributing to the continuity of senior leadership in the executive branch; and engaging the public in overseeing government integrity. OGE will also use its fiscal year 2019 resources to advance its important management objectives, including mitigating risks and responsibly managing its key information technology resources that affect the executive branchwide ethics program.

Appendix A – Fiscal Years 2018 and 2019 Performance Goals

Strategic Goal I: Advance a Strong, <u>Uniform</u> Executive Branch Ethics Program			
Strategic Objectives	Performance Goal	Fiscal Year 2018 Target	Fiscal Year 2019 Target
1.1: Provide expert guidance and support to stakeholders	Ethics officials believe OGE timely communicates ethics-related information.	85%	85%
	OGE Desk Officer assistance helps ethics officials perform their job duties.	85%	85%
	Agency administrators are satisfied with the support provided by OGE on its electronic public financial disclosure filing system.	70%	70%
1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program	After participating in an OGE training event, ethics officials believe they can more effectively perform their job function.	90%	90%
	After using a learning tool provided by OGE, ethics officials believe they can more effectively perform their job function.	85%	85%
1.3: Continuously refine ethics policy and issue interpretive guidance	Legal and Program Advisories help ethics officials perform their job duties.	80%	80%

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

Strategic Objectives	Performance Goals	Fiscal Year 2018 Target	Fiscal Year 2019 Target
2.1: Monitor agency compliance with executive branch ethics program requirements	In cases in which OGE identifies a program weakness, OGE's program review results in improvements in the agency's ethics program.	75%	75%
	Agency ethics programs are reviewed within established time frames.	Milestone: 20% of agencies	Milestone: 20% of agencies
2.2: Monitor senior leaders' compliance with individual ethics commitments	Public financial disclosure reports (annual, termination, and transaction) required to be submitted to OGE for second-level review are closed within established time frames.	90%	90%

Strategic Goal III: Contribute to the <u>Continuity</u> of Senior Leadership in the Executive Branch			
Strategic Objectives	Performance Goals	Fiscal Year 2018 Target	Fiscal Year 2019 Target
3.1: Prepare for a Presidential transition	Actively engage and/or coordinate with agencies and organizations focused on preparing for and executing smooth presidential transitions.	Milestone: Attend Planned Meetings	Milestone: Attend Planned Meetings
	Key transition-related resources are updated within established time frames.	--	Milestones: Begin updating the Public Financial Disclosure Guide Begin updating the Ethics Agreement Guide (guide to drafting ethics agreements for PAS nominees)
3.2: Provide assistance to the President and the Senate in the Presidential appointment process	Initial comments on draft financial disclosure reports of Presidential nominees for Senate confirmed appointments are provided to the agency within established time frames.	85%	85%
	Final financial disclosure reports of Presidential nominees for Senate confirmed appointments are certified by OGE within seven business days of receipt from the agency.	90%	90%

Strategic Goal IV: Engage the Public in Overseeing Government Integrity			
Strategic Objectives	Performance Goals	Fiscal Year 2018 Target	Fiscal Year 2019 Target
4.1: Inform the public about OGE and the executive branch ethics program		<ul style="list-style-type: none"> - Twitter engagement rate - Number of ethics documents viewed - # of Public Inquiries - # of Outreach Activities 	<ul style="list-style-type: none"> - Twitter engagement rate - Number of ethics documents viewed - # of Public Inquiries - # of Outreach Activities
4.2: Make ethics information publicly available	Ethics documents are posted within established time frame.	85%	85%

Management Objectives			
Management Objectives	Performance Goals	Fiscal Year 2018 Target	Fiscal Year 2019 Target
5.1: Sustain a Strong Culture of Performance Management	OGE's Employee Engagement Index score on the Employee Viewpoint Survey.	80%	80%
	Create or revise standard operating procedures for key agency programs.	4 per year	4 per year
5.2: Strengthen organizational compliance and fiscal stewardship	Percent of OGE employees that take required training (i.e., records, security, privacy, ethics).	90%	90%
	Results of annual financial audit.	Unqualified opinion	Unqualified opinion
5.3: Continuously enhance OGE's information systems and processes	Percent of non-maintenance downtime of <i>Integrity</i> , OGE's network, and website.	Integrity = Establish Baseline Network and Website = <1.0%	Integrity = Establish Baseline Network and Website = <1.0%
	Results of Cybersecurity Risk Management Assessment.	Managing risk for majority of categories	Managing risk for majority of categories

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