



September 30, 2020

The Honorable Raja Krishnamoorthi
United States House of Representatives
115 Cannon House Office Building
Washington, DC 20515

Dear Congressman Krishnamoorthi:

This responds to your letter dated August 28, 2020, regarding certain stocks owned by the Vice President's Chief of Staff and requesting details related to the U.S. Office of Government Ethics' (OGE) oversight role.

With respect to your first and second questions, in conducting oversight of agency ethics programs and to ensure agencies are properly administering their ethics programs, OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at each agency, as well as to identify executive branch-wide trends. OGE reviews agency programs to identify and report on the strengths and weaknesses of the program by evaluating (1) agency compliance with ethics requirements as set forth in relevant laws, regulations, and policies, and (2) ethics-related systems, processes, and procedures for administering the program. All program reports are available on OGE's recently redesigned website, which allows for all reports to be filtered by type and agency.¹ OGE most recently issued a report in 2015 for the Office of the Vice President (OVP).²

As part of OGE's oversight role and to ensure agencies are properly administering their ethics programs, agencies are also statutorily required to submit annual reports to OGE.³ OGE collects this data through its Annual Agency Ethics Program Questionnaire. In addition to publishing a report of the aggregate data, OGE also posts individual agency responses on its website to increase transparency and oversight, including the most recent response from OVP earlier this year.⁴

OGE also maintains a desk officer program to support agency ethics officials when they need assistance resolving novel or unusually complex ethics issues. As part of this program, OGE regularly provides advice to employing agencies and ethics offices upon request. OGE also contacts agency ethics officials when OGE becomes aware of potential concerns to ensure that the agency or office is analyzing and taking appropriate actions regarding the issues raised.

¹ *OGE.gov: Agency Ethics Documents Search Collection* (2020), <https://bit.ly/3cmVPZK>.

² OGE Report No. 15-591F, *Office of the Vice President Inspection Follow-up Report* (9/21/2015), <https://bit.ly/3cto49q>; OGE Report No. 15-16I, *Office of the Vice President Inspection Report* (3/6/2015), <https://bit.ly/36kKBEv>.

³ 5 U.S.C. app. § 402(e)(1).

⁴ *CY19 Annual Questionnaire for the Office of the Vice President* (2/3/2020), <https://bit.ly/3mRI3Dk>.



With regard to its role in individual senior leaders' disclosures, OGE provides expert, second-level review of financial disclosure reports for the highest-level executive branch positions. OGE also relies on transparency to enable the public to hold senior leaders accountable for making decisions that are based on the interests of the public rather than their personal financial interests. To increase transparency, OGE's new website also includes an upgraded portal listing executive branch officials' individual disclosures that allows results to be filtered by name, title, type and date.⁵

With respect to your third and fourth questions, OGE's most recent review of OVP's ethics program was published in 2015, and the program is not currently under review.⁶ Ethics questions that arose were detailed and addressed in that report.⁷ As stated above, OGE continuously provides support and guidance to agency ethics officials on an ongoing basis when they need assistance. OGE also works with OVP in conducting a second level review of financial disclosure reports for certain employees.

With respect to your final questions (1-4) related to records, all program reports are available on OGE's recently redesigned website, which allows for reports to be filtered by type and agency.⁸ All OVP ethics program reviews are available on OGE's website,⁹ as well as all responses from OVP to OGE's Annual Agency Ethics Program Questionnaire.¹⁰

I hope these responses and resources are helpful to you. If you require additional information or have questions, please contact OGE's Chief of Staff, Shelley K. Finlayson, at 202-482-9314.

Sincerely,

Emory A. Rounds, III
Director

⁵ *OGE.gov: Officials' Individual Disclosures Search Collection* (2020), <https://bit.ly/2RZ4Sa7>.

⁶ OGE Report No. 15-59IF, *Office of the Vice President Inspection Follow-up Report* (9/21/2015), <https://bit.ly/3cto49q>; OGE Report No. 15-16I, *Office of the Vice President Inspection Report* (3/6/2015), <https://bit.ly/36kKBEv>.

⁷ *OGE.gov: Agency Ethics Documents Search Collection* (2020), <https://bit.ly/3cmVPZK> (filtering for "Office of the Vice President" details OVP specific documents).

⁸ *OGE.gov: Agency Ethics Documents Search Collection* (2020), <https://bit.ly/3cmVPZK>.

⁹ OGE Report No. 15-59IF, *Office of the Vice President Inspection Follow-up Report* (9/21/2015), <https://bit.ly/3cto49q>; OGE Report No. 15-16I, *Office of the Vice President Inspection Report* (3/6/2015), <https://bit.ly/36kKBEv>.

¹⁰ *CY19 Annual Questionnaire for the Office of the Vice President* (2/3/2020), <https://bit.ly/3mRI3Dk>; *CY18 Annual Questionnaire for the Office of the Vice President* (3/15/2019), <https://bit.ly/3mS1vQm>; *CY17 Annual Questionnaire for the Office of the Vice President* (2/1/2018), <https://bit.ly/2G7L6qb>; *CY16 Annual Questionnaire for the Office of the Vice President* (2/1/2017), <https://bit.ly/307aQKq>; *CY15 Annual Questionnaire for the Office of the Vice President* (2/1/2016), <https://bit.ly/2Hx5IsK>; *CY14 Annual Questionnaire for the Office of the Vice President* (2/2/2015), <https://bit.ly/3kHMMpk>.