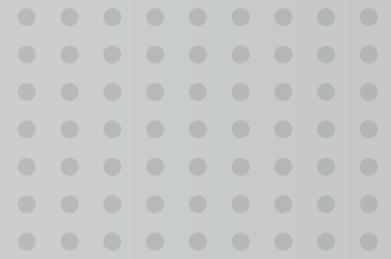


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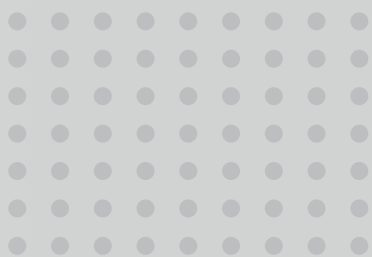
U.S. OFFICE OF
GOVERNMENT
ETHICS



STRATEGIC PLAN



FISCAL YEARS
2022-2026



DIRECTOR'S MESSAGE

I am honored to present the Strategic Plan for the United States Office of Government Ethics for 2022-2026. The trust of the American people is the foundation upon which our government's success depends. OGE's mission to detect and prevent conflicts of interest in the executive branch is vital to protecting the trust between the American people and their government. Our form of government requires that the public can be certain that government decisions are made in their interest and are not impaired by private financial interests.



To help ensure that the public can trust their government, OGE commits to advancing the following goals:

- **STRATEGIC GOAL 1: Advance a Strong, Consistent Executive Branch Ethics Program**
- **STRATEGIC GOAL 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program**
- **STRATEGIC GOAL 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership**
- **STRATEGIC GOAL 4: Use Transparency to Further Oversight of the Executive Branch**

OGE developed these goals and its plan based on feedback from its employees, ethics officials, NGOs, academia, and the public. Thank you to everyone who participated in the process. OGE looks forward to working with agencies across the executive branch to build and reinforce the trust between the American people and their government so that our nation may continue to thrive.

Sincerely,

A handwritten signature in black ink that reads "Emory Rounds". The signature is written in a cursive, flowing style.

Emory A. Rounds, III, Director

PART I

OGE'S MISSION

The U.S. Office of Government Ethics (OGE) was established by the Ethics in Government Act of 1978 to provide **“overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and employees of any executive [branch] agency.”**

As this statutory language makes clear, the primary objective of the executive branch ethics program is one of *prevention*.

Under OGE's leadership, thousands of ethics officials are engaged every day in preventing ethical lapses and protecting the impartiality of government decision-making by implementing ethics programs and applying the ethics laws and rules in the more than 130 agencies across the executive branch.

If these efforts at prevention fall short, agencies may be crippled by scandal, important work may be delayed or derailed, leaders may be forced from office, and ultimately the public's trust in government may be eroded.

“At its heart, the ethics program stands for the bedrock principle that public service is a public trust.”

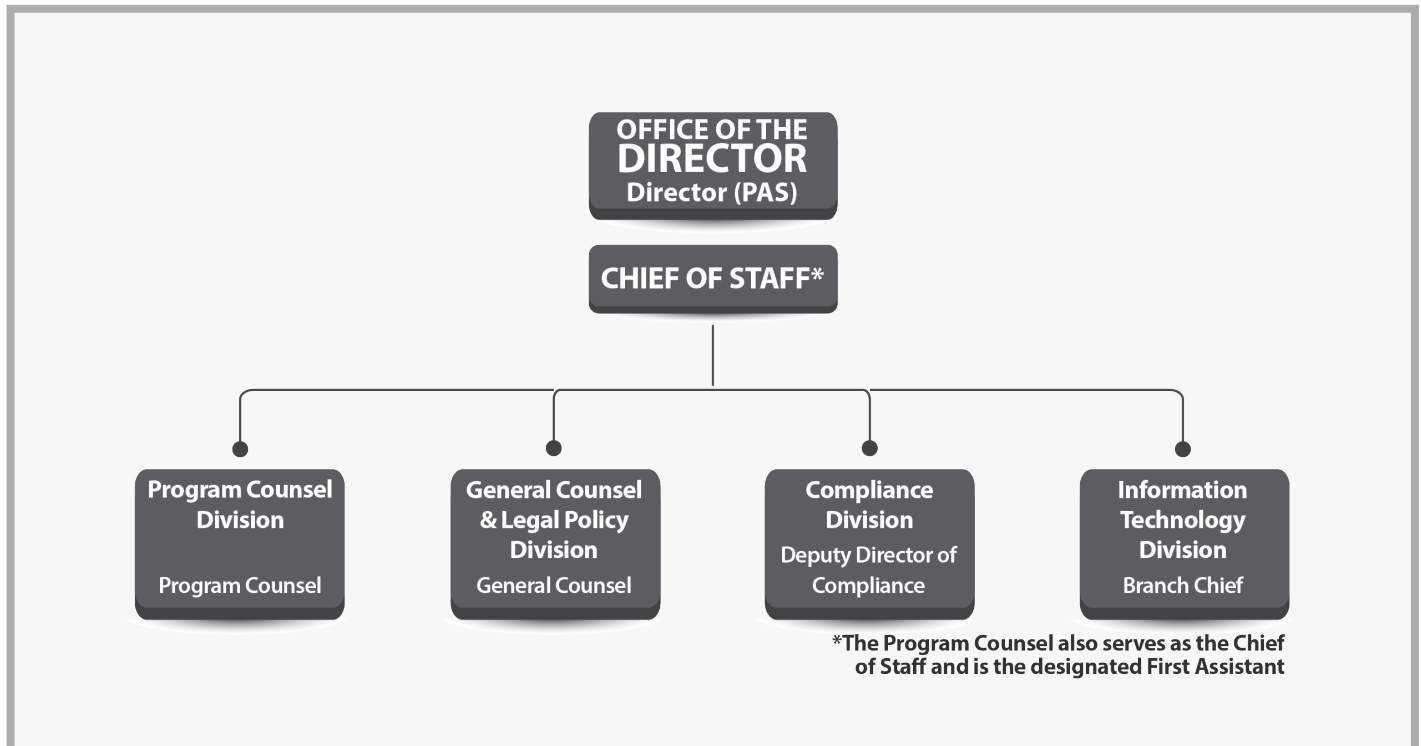


PART II

ORGANIZATIONAL STRUCTURE

Office of Government Ethics: A Small but Agile Agency

OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents (FTE). OGE’s greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, as well as other key personnel. OGE is headed by a Director who is appointed to a five-year term by the President. In addition to the Office of the Director, OGE is divided into four divisions, guided by OGE’s Chief of Staff and senior leadership, who work in concert to carry out OGE’s mission. [See page 32 for additional information.](#)



OGE and Executive Branch Agencies: A Shared Responsibility

Maintaining the trust of the citizens we serve is a shared responsibility between OGE and executive branch agencies. OGE ensures that the ethics program remains an effective prevention mechanism to guard against conflicts of interest and violations of ethical standards. As the supervising ethics office, OGE sets policy for the entire executive branch ethics program. This program involves a variety of key elements, including leadership support, financial disclosure, education and training, ethics counseling, remediation of conflicts of interest, and transparency.



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

The head of each agency is also responsible for selecting a Designated Agency Ethics Official (DAEO). The DAEO, with the support of professional ethics staff, is the employee with primary responsibility for directing the daily activities of an agency's ethics program and coordinating with OGE. Each agency's employees,

including supervisors, human resources officials, and the agency's Inspector General, play a significant role in maintaining the integrity of government programs and operations.

OGE, and the ethics officials across the government, are not alone in promoting trust in government. Other executive branch agencies and entities focus on additional areas of government integrity, such as 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.¹



¹ See, e.g., [28 U.S.C. §§ 501-599](#) (DOJ); [5 U.S.C. app. §§ 1-13](#) (IG Act); [5 U.S.C. §§ 1101-1105](#) (OPM); [5 U.S.C. §§ 1201-1206](#) (MSPB); [5 U.S.C. §§ 1211-1219](#) (OSC); [5 U.S.C. § 3110](#) (Employment of relatives); [41 U.S.C. § 3301](#) (Full and open competition); [5 U.S.C. § 552](#) (Public information); [31 U.S.C. § 1341](#) (Appropriations).

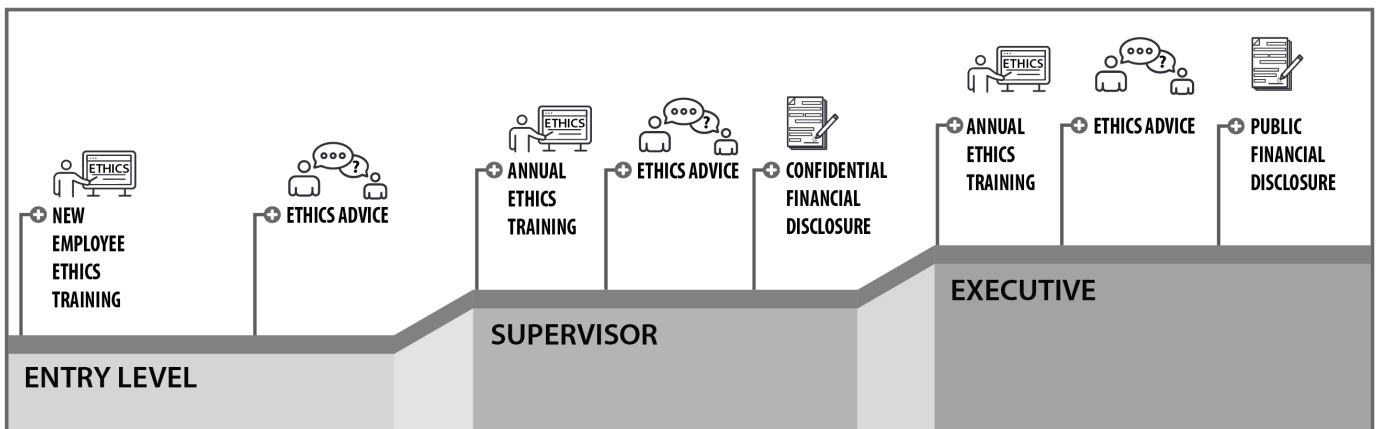
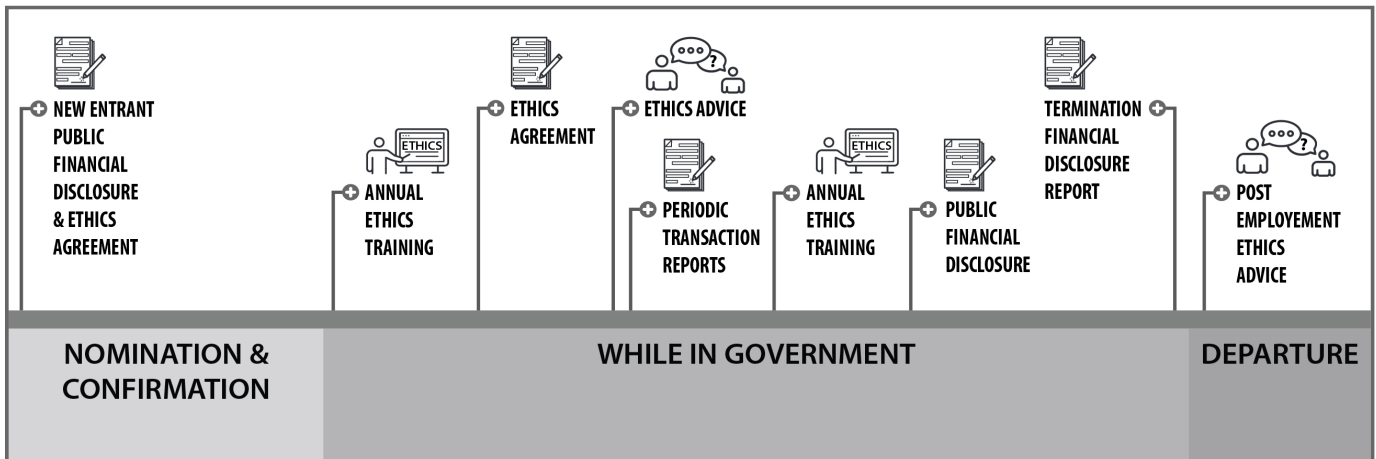
The Ethics Program Serves the Public by Serving Federal Employees

The public is better served by their government because the ethics program helps ensure that employees at all phases of their public service understand their ethical responsibilities and carry out the important work they do for the public with impartiality and without conflicts of interest.

Specifically, the program strives to ensure:

- Incoming employees are made aware of their ethical obligations and roles in creating an ethical culture in their organizations as they begin government service.
- Employees serving the public 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.
- Exiting employees and those seeking to leave the government avoid conflicts of interest and, after they leave government service, do not exercise undue influence over their former agencies on behalf of others.

ETHICS ALONG A CAREER PATH



PART III

STRATEGIC GOALS & OBJECTIVES

OGE’s Strategic Plan (Plan) establishes a framework for OGE to use when developing planned work to carry out its mission over the next five years. OGE’s Plan is structured around four strategic goals, twelve strategic objectives, one crosscutting objective, and three stewardship objectives.

OGE’s four strategic goals are:

- STRATEGIC GOAL 1: Advance a Strong, Consistent Executive Branch Ethics Program**
- STRATEGIC GOAL 2: Hold the Executive Branch Accountable for Carrying Out an Effective Ethics Program**
- STRATEGIC GOAL 3: Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership**
- STRATEGIC GOAL 4: Use Transparency to Further Oversight of the Executive Branch**

These goals reflect the broad, long-term outcomes OGE aspires to achieve in order to fulfill its mission of preventing conflicts of interest and its vision of achieving a high level of public confidence in the integrity of executive branch programs and operations.

Twelve strategic objectives and one cross-cutting objective encompass OGE’s key activities and describe the strategies OGE will take towards achieving each of the four strategic goals. In addition, three stewardship objectives reflect OGE’s management priorities and directly support OGE’s accomplishment of its mission.

STRATEGIC GOAL	STRATEGIC GOAL	STRATEGIC GOAL	STRATEGIC GOAL
I	II	III	IV
<p>Advance a Strong, Consistent Executive Branch Ethics Program</p>	<p>Hold the Executive Branch Accountable for Carrying Out an Effective Ethics</p>	<p>Help Top Executive Branch Officials Resolve Conflicts of Interest and Demonstrate Ethical Leadership</p>	<p>Use Transparency to Further the Oversight of the Executive Branch</p>
<p>Strategic Objective 1.1: Provide expert guidance and support to ethics officials and other stakeholders.</p> <p>Strategic Objective 1.2: Strengthen the expertise of officials who are integral to the executive branch ethics program.</p> <p>Strategic Objective 1.3: Continuously refine ethics policy and issue interpretive guidance.</p> <p>Strategic Objective 1.4: Lead the financial disclosure program and provide the executive branch e-filing system, <i>Integrity</i>.</p>	<p>Strategic Objective 2.1: Monitor agency compliance with executive branch ethics program requirements.</p> <p>Strategic Objective 2.2: Monitor senior leaders’ compliance with individual ethics responsibilities and commitments.</p> <p>Strategic Objective 2.3: Use OGE’s authorities to address known or potential ethics risks.</p>	<p>Strategic Objective 3.1: Carry out OGE’s statutory role in preparing for and supporting Presidential transitions.</p> <p>Strategic Objective 3.2: Assist the President and the Senate in the Presidential appointments process.</p> <p>Strategic Objective 3.3: Foster ethical leadership in senior officials.</p>	<p>Strategic Objective 4.1: Make ethics information publicly available.</p> <p>Strategic Objective 4.2: Reach a broader array of stakeholders.</p>
<p>Crosscutting Objectives 5.1: Advance equity in OGE’s programs and improve diversity, equity, inclusion, and accessibility in OGE’s operations.</p>			
<p>Stewardship Objective 6.1: Sustain a high-performing, cross-functional staff.</p> <p>Stewardship Objective 6.2: Leverage technology to increase efficiency and effectiveness.</p> <p>Stewardship Objective 6.3: Safeguard the government resources entrusted to OGE.</p>			

★ STRATEGIC GOAL I:

ADVANCE A STRONG, CONSISTENT EXECUTIVE BRANCH ETHICS PROGRAM

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

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

- (1.1) Provide expert guidance and support to ethics officials and other stakeholders;*
- (1.2) Strengthen the expertise of officials who are integral to the executive branch ethics program;*
- (1.3) Continuously refine ethics policy and issue interpretive guidance; and*
- (1.4) Lead the financial disclosure program and provide the executive branch e-filing system, Integrity.*

STRATEGIC OBJECTIVE 1.1:

PROVIDE EXPERT GUIDANCE AND SUPPORT TO ETHICS OFFICIALS AND OTHER STAKEHOLDERS

OGE provides expert guidance and support to ethics officials and other stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. Without OGE's expert guidance, agency employees and their leaders are left to guess at consistent solutions to complex ethical dilemmas, and ethics programs would be fragmented and inconsistently implemented.

STRATEGIES

- *Supply ethics officials with access to on-demand ethics expertise to respond to real-time questions from their agency's leaders and employees.*
- *Communicate helpful, written guidance that is disseminated widely.*
- *Respond to requests for expert advice from critical stakeholders, such as Congress, Inspectors General, government watchdogs, professional associations, non-governmental organizations, academia, state and local governments, and employee groups.*
- *Support the vital work of the ethics enforcement communities.*
- *Participate actively in U.S. government anti-corruption efforts.*

PERFORMANCE INDICATORS:

- Percent of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties
- Percent of ethics officials who believe OGE timely communicates ethics-related information
- Number of requests for assistance from ethics officials
- Number of requests for technical assistance from other stakeholders

STRATEGIC OBJECTIVE 1.2:

STRENGTHEN THE EXPERTISE OF OFFICIALS WHO ARE INTEGRAL TO THE EXECUTIVE BRANCH ETHICS PROGRAM

OGE seeks to strengthen the expertise of all officials who are integral to carrying out an effective executive branch ethics program, including ethics officials, agency leaders, Inspectors General, and human resources professionals. Without competent ethics officials, engaged leaders, informed investigators, and collaborative HR officials, the ethics program cannot succeed in implementing a consistent program that helps executive branch agencies mitigate risk.

STRATEGIES

- *Develop senior ethics officials (DAEOs & ADAEOs) so that they have the skills and knowledge to lead effective ethics programs.*
- *Prepare ethics officials at all levels to train, advise, and support their employees and further their agencies' missions.*
- *Improve the delivery and content of ethics education at agencies, including a focus on equity.*
- *Create opportunities for knowledge exchange and collaboration between ethics officials across executive branch agencies.*
- *Maintain an online learning library for ethics officials at all levels of experience to develop their skills and abilities.*
- *Educate other officials who are integral to the executive branch ethics program.*

PERFORMANCE INDICATORS:

- Percent of ethics officials who believe, after using a learning tool provided by OGE, that they can more effectively perform their job functions
- Percent of ethics officials who believe, after participating in an OGE training event, that they can more effectively perform their job functions
- Number of registrants for OGE courses
- Number of online views of OGE's courses and learning tools

STRATEGIC OBJECTIVE 1.3:

CONTINUOUSLY REFINE ETHICS POLICY AND ISSUE INTERPRETIVE GUIDANCE

Ethics challenges continually evolve. OGE continually adapts by regularly revisiting its rules, refining its policies, considering agency-specific needs, and establishing new processes to ensure the continued consistency and effectiveness of the executive branch ethics program. OGE is responsible for interpreting the statutes and rules that form the building blocks of the executive branch ethics program, including the criminal conflict of interest laws and Standards of Ethical Conduct for Employees of the Executive Branch, and must act to keep pace with evolving challenges to the consistency and strength of the program.

STRATEGIES

- *Review, refine, and publish ethics regulations and policies that address new requirements, respond to novel issues, and adapt to changes in the way government accomplishes its mission.*
- *Evaluate and respond to requests from agencies to tailor their ethics programs.*
- *Update and timely maintain the administrative materials (such as forms and records schedules) necessary to support a consistent executive branchwide program.*

PERFORMANCE INDICATORS:

- Milestones for regulatory revisions
- Percent of ethics officials who believe Legal and Program Advisories help them perform their job duties
- Number of Advisories issued

STRATEGIC OBJECTIVE 1.4:

LEAD THE FINANCIAL DISCLOSURE PROGRAM AND PROVIDE THE EXECUTIVE BRANCH E-FILING SYSTEM, INTEGRITY

OGE leads the executive branchwide disclosure systems, public and confidential, that serve to prevent conflicts of interest through a systematic review of the financial interests of both current and prospective employees. Without OGE's leadership of this program there would be inconsistent implementation of the confidential and public financial disclosure systems.

STRATEGIES

- *Operate Integrity, the executive branch e-filing system for more than 90% of public filers.*
- *Sustain uniform procedures and requirements for financial disclosure.*
- *Maintain and update uniform public and confidential disclosure forms.*
- *Provide guidance on confidential and public financial disclosure programs and reporting requirements.*
- *Evaluate and respond to requests from agencies to use alternative financial disclosure forms.*

PERFORMANCE INDICATORS:

- Percent of agency administrators satisfied with the support provided by OGE on its electronic public financial disclosure filing system, *Integrity*
- Approval of ethics forms timely renewed under the Paperwork Reduction Act
- Satisfaction with public and confidential financial disclosure resources
- Percent of downtime of *Integrity*
- Feedback from *Integrity* users

★ STRATEGIC GOAL II:

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

Today there is a functioning ethics program in each of the more than 130 agencies across the executive branch. 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. OGE holds the executive branch accountable for carrying out an effective ethics program, because when an ethics program fails or an individual fails to meet their ethical commitments, the executive branch is less able to deliver for the American people.

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

- (2.1) Monitor agency compliance with executive branch ethics program requirements;*
- (2.2) Monitor senior leaders' compliance with individual ethics responsibilities and commitments; and*
- (2.3) Use OGE's authorities to address known or potential ethics risks.*

STRATEGIC OBJECTIVE 2.1:

MONITOR AGENCY COMPLIANCE WITH EXECUTIVE BRANCH ETHICS PROGRAM REQUIREMENTS

The executive branch ethics program is decentralized and its success relies on each agency implementing the ethics program requirements established by OGE. OGE regularly conducts oversight of agency compliance with these requirements in order to mitigate ethics program vulnerabilities at each agency and to identify executive branchwide trends. Without this oversight, systemic problems may multiply and result in ethics program failures.

STRATEGIES

- *Identify program weaknesses (non-compliance) with ethics program requirements.*
- *Issue and publish recommendations requiring agencies to address program weaknesses and non-compliance with ethics program requirements.*
- *Follow-up on identified program weaknesses and non-compliance until resolved.*
- *Collect, evaluate, publish, and take action based on ethics program data.*
- *Collect, analyze, and publish information on potential ethics violations by executive branch employees.*

PERFORMANCE INDICATORS:

- Percent of cases in which a program weakness identified during an OGE program review results in improvements in the agency's ethics program
- Number of recommendations issued
- Percent of agency ethics programs reviewed within established time frames
- Publication of program reviews and responses to the Annual Agency Ethics Program Questionnaire

STRATEGIC OBJECTIVE 2.2:

MONITOR SENIOR LEADERS' COMPLIANCE WITH INDIVIDUAL ETHICS COMMITMENTS

Executive branch employees must endeavor to act at all times in the public's interest. They must avoid losing impartiality or appearing to lose impartiality in carrying out their official duties and comply with the requirements of government ethics laws and regulations. OGE monitors senior leaders' compliance with their individual ethics commitments to confirm that they keep the promises they made when entering government and continue to serve impartially throughout their service as government employees. If OGE does not monitor senior leaders' compliance with their individual ethics commitments, the public cannot be certain that government leaders are acting in their interest.

STRATEGIES

- *Collect and publish documentation of senior agency leaders' compliance with their individual ethics commitments.*
- *Conduct expert, second-level reviews of senior agency leaders' periodic and annual financial disclosure reports.*
- *Analyze, respond to requests for Certificates of Divestiture and make available to the public those approved/issued by OGE.*
- *Consult with agencies on waivers to the primary criminal conflict of interest law, 18 U.S.C. § 208, for their employees.*

PERFORMANCE INDICATORS:

- Percent of officials who comply with their ethics agreements
- Percent of public financial disclosure reports required to be submitted to OGE for second-level review that are closed within established time frames
- Number of disclosures and certificates of divestiture posted

STRATEGIC OBJECTIVE 2.3:

USE OGE'S AUTHORITIES TO ADDRESS KNOWN OR POTENTIAL ETHICS RISKS

Although limited by statute,² OGE uses its authorities and oversight role to address known or potential ethics risks that come to its attention. Without OGE's inquiry and intervention, ethics vulnerabilities may go unaddressed, undermining public confidence and impairing the operations of the executive branch.

STRATEGIES

- *Inquire and potentially intervene if an agency ethics program appears to OGE to be out of compliance with ethics requirements.*
- *Inquire and potentially hold the employing agency accountable for action when one of its employees appears to OGE to be out of compliance with ethics requirements.*
- *Order corrective action on the part of a non-compliant agency and notify the President if non-compliance continues.³*
- *Use transparency to hold agency leaders and ethics programs accountable.*

PERFORMANCE INDICATORS:

- Timely and consistently apply formal written procedures to determine when OGE conducts inquiries
- Timely and consistently apply formal written procedures to determine when OGE orders an agency to take corrective action
- Agencies' responses to OGE's inquiries, and if needed/recommended, agencies' actions related to inquiries

²The responsibility for investigating alleged wrongdoing and taking disciplinary or other action against an executive branch employee rest with the management of the employing agency, the relevant inspector general's office, or in the case of alleged crimes, the Justice Department. See 5 U.S.C. app. § 402. OGE cannot issue subpoenas, question witnesses, compel the production of documents, or take action against individuals who refuse to cooperate. When questions arise as to an appointee's compliance with ethics requirements, the law authorizes OGE only to make a recommendation that the employing agency look into the matter and consider taking appropriate action. If an agency were to decline the recommendation, OGE's only recourse would be to notify the President. See 5 U.S.C. app. § 402(f)(2)(A).

³See 5 U.S.C. app. § 402(b)(9).

★ STRATEGIC GOAL III:

★ HELP TOP EXECUTIVE BRANCH OFFICIALS RESOLVE ★ CONFLICTS OF INTEREST AND DEMONSTRATE ETHICAL LEADERSHIP

OGE has a vital role in supporting the President’s constitutional duty to nominate and appoint officers to the executive branch. OGE helps top executive branch officials resolve conflicts and demonstrate ethical leadership. Ethical culture begins with demonstrated ethical leadership throughout an organization.

To achieve its strategic goal of helping top executive branch officials resolve conflicts of interest and demonstrate ethical leadership, OGE has developed three strategic objectives. These strategic objectives are:

- (3.1) Carry out OGE’s statutory role in preparing for and supporting Presidential transitions;*
- (3.2) Assist the President and the Senate in the Presidential appointments process; and*
- (3.3) Foster ethical leadership in senior officials.*

STRATEGIC OBJECTIVE 3.1:

CARRY OUT OGE'S STATUTORY ROLE IN PREPARING FOR AND SUPPORTING PRESIDENTIAL TRANSITIONS

OGE has a unique and important statutory role in supporting Presidential transitions. Therefore, OGE actively prepares the agency and the executive branchwide program in advance of each Presidential election to be ready to carry out its important Presidential appointments work. Failure to effectively prepare to assist the President and the Senate in the Presidential appointments process can result in critical senior leadership positions remaining vacant for extended periods, putting the safety and security of the nation at risk.

STRATEGIES

- *Use decades of expertise and apply lessons learned from previous Presidential transitions to improve program efficiency and effectiveness.*
- *Support and hold accountable agency ethics officials in preparing for a potential Presidential transition.*
- *Develop and share key Presidential transition resources for a range of audiences.*
- *Engage and actively participate on government-wide transition councils.*
- *Train and support Presidential campaigns, the Presidential Transition Team, and the elected Administration.*

PERFORMANCE INDICATORS:

- Engage and coordinate with agencies and organizations focused on preparing for and executing a smooth Presidential transition
- Timely update key transition-related resources
- Provide internal and external training on financial disclosure

STRATEGIC OBJECTIVE 3.2:

ASSIST THE PRESIDENT AND THE SENATE IN THE PRESIDENTIAL APPOINTMENTS PROCESS

Whenever the government's top leadership positions are vacant, the nation is vulnerable in its ability to respond to potential human-caused, natural, cyber, or economic disasters. Therefore, OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointments process.

STRATEGIES

- *Conduct expert, second-level reviews of financial disclosure reports of nominees to the highest-level executive branch positions.*
- *Resolve potential conflicts of interest of incoming senior leaders.*
- *Work with agencies and filers to ensure compliance with the extensive requirements for financial disclosure under the Ethics in Government Act.*

PERFORMANCE INDICATORS:

- Initial comments on draft financial disclosure reports of Presidential nominees for Senate-confirmed appointments are provided to agencies within established time frames
- Final financial disclosure reports of Presidential nominees for Senate-confirmed appointments are certified by OGE within established time frames

STRATEGIC OBJECTIVE 3.3:

FOSTER ETHICAL LEADERSHIP IN SENIOR OFFICIALS

Ethical leadership and building an ethical culture are necessary components of the executive branch ethics program because organizational culture is one of the strongest drivers of employees' behavior. Therefore, OGE continually seeks opportunities to engage senior leaders on the importance of ethics and to sensitize federal managers to their ethics responsibilities.

STRATEGIES

- *Communicate directly with agency heads regarding their unique responsibilities under the ethics regulations.*
- *Encourage senior leaders' support of the ethics program.*
- *Maintain specific regulatory ethics standards for senior leaders and managers.*
- *Convey the importance of and techniques for leading ethical organizations to senior leaders.*
- *Educate senior leaders and managers on their personal and programmatic ethics obligations.*

PERFORMANCE INDICATORS:

- Federal Employee Viewpoint Survey scores
- Number of direct communications with senior leaders
- Number of trainings conducted
- Number of messages sent

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STRATEGIC GOAL IV:

USE TRANSPARENCY TO FURTHER THE OVERSIGHT OF THE EXECUTIVE BRANCH

Transparency plays an essential role in strengthening trust in government. OGE works hard to fulfill this responsibility by making ethics documents available and helping to make the American people aware that there are systems in place and mechanisms available to hold their government accountable. Without this transparency, the public could not meaningfully oversee the integrity of its government.

To achieve its strategic goal of using transparency to further oversight of the executive branch, OGE has developed two strategic objectives:

(4.1) Make ethics information publicly available; and

(4.2) Reach a broader array of stakeholders.

STRATEGIC OBJECTIVE 4.1:

MAKE ETHICS INFORMATION PUBLICLY AVAILABLE

OGE makes a wide array of ethics information publicly available to help the American public hold senior leaders accountable for making decisions that are based on the interests of the public rather than their own personal financial interests. If the public does not have the information it needs to ensure that government officials are free from conflicts of interest, their trust in government may erode, and they may become convinced that those officials are prioritizing private interests over the nation's interests.

STRATEGIES

- *Provide timely access to ethics information.*
- *Make ethics information understandable and easy to locate.*
- *Create public-friendly, explanatory content about ethics.*
- *Respond to requests for publicly available ethics materials.*
- *Maintain a responsive Freedom of Information Act (FOIA) program.*
- *Analyze available data to assess public interest in ethics information and evaluate the need for additional transparency.*

PERFORMANCE INDICATORS:

- Percent of ethics documents made available within established time frames
- Stakeholder feedback on the clarity of how to access and use ethics materials
- Number of ethics documents requested and released
- Number of Twitter impressions
- Number of website users and page views
- Percent of FOIA requests closed within established time frames

STRATEGIC OBJECTIVE 4.2:

REACH A BROADER ARRAY OF STAKEHOLDERS

OGE seeks to reach a broader array of stakeholders to raise awareness of the systems and processes in place to detect and resolve conflicts of interest. Without accurate information the public cannot make informed judgments about the integrity of their government. When the public feels that information is being withheld, they may become suspicious, and their confidence in the executive branch may erode.

STRATEGIES

- *Seek new opportunities to educate a variety of stakeholders.*
- *Create communications that are accurate, compelling, relevant, and tailored to each target audience.*
- *Deliver content through effective communication channels.*
- *Respond timely to external requests for information and assistance.*
- *Participate and collaborate with ethics practitioners across various segments of society.*

PERFORMANCE INDICATORS:

- OGE's Twitter engagement rate
- Number of page views and unique visitors to OGE's website
- Number of outreach activities
- Number of requests for assistance
- Feedback from website users

★ ★ ★ ★ ★ CROSSCUTTING OBJECTIVE V:

CROSSCUTTING OBJECTIVE 5.1:

ADVANCE EQUITY IN OGE'S PROGRAMS & IMPROVE DIVERSITY, EQUITY, INCLUSION, AND ACCESSIBILITY IN OGE'S OPERATIONS

OGE strives to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our government. By advancing equity within its programs and operations, OGE can create opportunities to better serve those who have been historically underserved.

STRATEGIES

- *Assess ethics policies and programs for barriers to equity.*
- *Reform ethics policies and programs identified as barriers to equitable opportunity.*
- *Evaluate and alter, as needed, OGE's procurement processes.*
- *Assess and alter, as needed, OGE's external communications.*
- *Adopt new approaches to stakeholder engagement.*
- *Review and revise, as needed, OGE's employment practices.*

PERFORMANCE INDICATORS:

- Completion of an equity assessment in each of the areas OGE is evaluating
- Number of webpages and communications reviewed and revised to remove barriers
- Number of Diversity, Equity, Inclusion, and Accessibility promising practices implemented
- Percent of employees who participate in DEIA trainings

★ ★ ★ ★ ★ ★ STEWARDSHIP OBJECTIVES VI:

To effectively lead in ethics, OGE must be a strong, well-run agency in order to carry out its critical mission of preventing conflicts of interests in the executive branch. Therefore, OGE endeavors to be a model agency with regard to its workforce, technology, and compliance. The agency invests in the development, diversity, and retention of its most valuable asset: its staff. OGE invests in its employees who work tirelessly to carry out the day-to-day work to accomplish the agency's vital mission. The agency leverages technology to amplify its impact by increasing the reach of its limited resources. OGE also strives to maximize every taxpayer dollar entrusted to the agency and to remain compliant with the wide array of requirements applicable to federal agencies.

In support of its mission and strategic goals, OGE has developed three stewardship objectives:

(6.1) Sustain a high-performing, cross-functional staff;

(6.2) Leverage technology to increase efficiency and effectiveness; and

(6.3) Safeguard the government resources entrusted to OGE.

STEWARDSHIP OBJECTIVE 6.1:

SUSTAIN A HIGH-PERFORMING, CROSS-FUNCTIONAL STAFF

OGE is able to successfully meet its mission because of its high-performing, cross-functional staff. Continued attention to the development and retention of staff is of critical importance to the agency's operations and successful performance of its mission activities.

STRATEGIES

- *Retain and build staff expertise, resiliency, and ability to adapt to new challenges.*
- *Recognize and reward outstanding performance by OGE employees and take steps to improve poor performance.*
- *Promote diversity and inclusion.*
- *Invest in the professional development of OGE staff at all levels.*
- *Communicate clearly across the organization and help employees collaborate to effectively achieve OGE's mission.*

PERFORMANCE INDICATORS:

- OGE's score on the Employee Engagement Index on the Federal Employee Viewpoint Survey
- Fulfillment of Employee Development Plans
- Implementation of employee recognition programs

STEWARDSHIP OBJECTIVE 6.2:

LEVERAGE TECHNOLOGY TO INCREASE EFFICIENCY AND EFFECTIVENESS

OGE leverages technology to increase its efficiency and effectiveness in all aspects of its work. Without strong, secure information systems and processes, the agency cannot carry out its executive branchwide mandates, operate effectively, or efficiently perform its mission-critical activities.

STRATEGIES

- *Identify and implement new technological solutions to address operational challenges and risks.*
- *Maintain up-to-date systems and equipment.*
- *Evaluate and enhance agency practices and procedures.*
- *Enhance the functionality of information technology tools, resources, and systems.*

PERFORMANCE INDICATORS:

- Number of new or modified applications
- Number of new or modified standard operating procedures
- Technological solutions implemented
- Percent of downtime of network and website

STEWARDSHIP OBJECTIVE 6.3:

SAFEGUARD THE GOVERNMENT RESOURCES ENTRUSTED TO OGE

In addition to its mission work, OGE brings to life the principle that “public service is a public trust” in the ways that it conducts its agency operations. OGE is a compliance organization that takes seriously its compliance with government-wide directives and their important policy objectives. Therefore, OGE carefully safeguards the government’s resources entrusted to the agency.

STRATEGIES

- *Implement sound financial management practices, including an annual, independent audit.*
- *Pursue efficiencies, such as the economies of scale available through shared services.*
- *Implement strong internal controls.*
- *Keep privacy protected information and records secure.*
- *Maintain a strong, secure information technology infrastructure.*
- *Comply with the wide array of requirements applicable to federal agencies.*
- *Train and provide resources to OGE employees to comply with government-wide requirements and mitigate risk.*

PERFORMANCE INDICATORS:

- Percent of OGE employees who take required training (i.e., records, security, privacy, ethics)
- Results of independent, annual financial audit
- Results of Cybersecurity Risk Management Assessment

PART IV

EXTERNAL FACTORS

OGE's Strategic Plan assumes adequate levels of fiscal and human resources. From experience, OGE knows that the agency will face certain external factors and, to the extent possible, has factored those into this Plan. The following external factors could cause OGE to incur costs, impede our mission, or necessitate reallocating staffing resources.

- ***Nominee Workload:*** Based on prior experience prior to and for two years after the election of a new President, OGE experiences more than a doubling of its workload for reviewing financial disclosure reports of nominees requiring Senate confirmation. The rate of confirmations by the Senate may also increase OGE's workload, if nominations are returned and must be re-reviewed, certified, and transmitted to the Senate because they have remained unconfirmed for an extended period.
- ***IT Threats:*** With a dispersed, virtual workforce, the availability of OGE's virtual network is more critical than ever and any unscheduled downtime has an even greater impact on operations. 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.
- ***Potential disruption and cost of relocation under a new lease:*** GSA's current lease for OGE's space ends February 2024. OGE is working with GSA to review its current space needs and will work with them on the negotiation of a new lease. Depending on the outcome of the lease negotiations, OGE could incur millions in additional costs and its work could be disrupted by being forced to relocate its staff.
- ***Integrity:*** OGE is responsible for the security and operational stability of *Integrity*, a system vital to the Presidential appointments process, senior leaders, and the executive branchwide ethics program. Although OGE actively manages risks, there are unanticipated critical failures that can occur to an IT system of its size. Therefore, OGE may need to divert resources to address those issues as they arise.

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- *Potential Legislative Reform:* OGE is the subject of significant and intense congressional and stakeholder interest. OGE is currently tracking more than 100 bills that would make significant statutory revisions to the Ethics in Government Act or the criminal conflict of interest statutes, or create entirely new ethics-related statutes. Passage of major ethics reform would present significant challenges for OGE.
 - *Future of Work:* OGE continues to prioritize employee health and safety, evaluate its personnel policies and work environments, and pilot new operating approaches and workplace innovations, while carefully considering trends related to the federal workplace.
 - *Workload and Unfunded Mandates:* OGE produces a remarkable amount with a small staff by carefully managing the cyclical nature of the agency's work and leveraging its highly cross-functional professional employees. Although agile, significant unanticipated changes in workload from such inter-agency mandates and government wide initiatives have impacts across programs.

PART V

EVIDENCE BUILDING

OGE has long understood the importance of using evidence and evaluation to measure the effectiveness of both the executive branch ethics program and OGE's mission activities in support of the executive branch ethics program. Historically, OGE has gathered evidence through direct feedback from executive branch agency ethics officials and stakeholders in written and verbal form, including:

- ■ ■ Conducting reviews of agency ethics programs;
- ■ ■ Surveying ethics officials annually to assess their satisfaction with OGE's guidance, training, and overall efforts;
- ■ ■ Surveying employees through the Merit Systems Protection Board employee surveys to assess their understanding of the executive branch ethics rules;
- ■ ■ Collecting information annually from each agency about their ethics program to gain insight into their operations;
- ■ ■ Collecting written evaluations from participants after OGE's training events to ensure that training is effective and useful;
- ■ ■ Conducting research on academic practices related to managing ethics programs;
- ■ ■ Analyzing requests for assistance from agency ethics officials and the public to identify trends;

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- Utilizing metrics gathered from OGE’s website to gauge public interest; and
 - Assessing responses by OGE employees to OPM’s Employee Viewpoint Survey to measure employee engagement, among other things.

OGE consistently looks for opportunities through its mission activities to gather valuable information and evaluate the effectiveness of its programs. OGE prioritizes work by continuously analyzing data sources and conducting outreach to the ethics community and other external stakeholders. OGE’s Data Governance Board (DGB) provides executive leadership and oversight for the development and implementation of the policies and processes which govern the collection or creation, management, use, and disclosure of OGE data. This approach ensures that OGE allocates its resources according to areas with the greatest demand, such as the need for additional guidance, support, education, oversight, or outreach.

APPENDIX I

ORGANIZATIONAL STRUCTURE

OFFICE OF THE DIRECTOR

The Office of the Director provides overall direction to the executive branch ethics program and is responsible for ensuring that OGE fulfills its congressional and Presidential mandates. The Director is appointed by the President and is confirmed by the Senate to a five-year term. The Director is a member of the Council of the Inspectors General for Integrity and Efficiency (CIGIE) and the Integrity Committee of the CIGIE, which reviews allegations of misconduct against Inspectors General. The Director also serves as a member of the Administrative Conference of the United States.

PROGRAM COUNSEL DIVISION

The Program Counsel Division (PCD) is responsible for (1) coordinating and conducting outreach between OGE and its many stakeholders, such as Congress, Office of Management and Budget (OMB), government watchdog groups, and the public; (2) developing and providing training to agency ethics officials; (3) carrying out initiatives that reach across executive branch agencies, such as e-filing; (4) providing agency-specific legal support to OGE; (5) managing OGE's budget, performance, and legislative affairs programs; and (6) supporting agency ethics officials, through its Desk Officer program, in carrying out the executive branch ethics program.

The Legal, External Affairs, and Performance Branch (LEAP) provides agency-specific legal support to OGE. LEAP manages OGE's strategic initiatives, including e-filing, performance management, budget, communications, and legislative affairs programs. LEAP serves as OGE's liaison to the Office of the Federal Register and the Office of Information and Regulatory Affairs within OMB, and oversees OGE's Freedom of Information Act, Privacy Act, and records management programs.

The Agency Assistance Branch (AAB) provides vital services and support to agency ethics officials throughout the executive branch. Through its Desk Officer program, AAB provides timely and accurate advice to ethics officials in response to questions regarding unique or emerging ethics-related issues. In addition to responding to requests for advice, AAB Desk Officers actively reach out to the ethics community to address issues and challenges that are of common interest, in order to arrive at and share collaborative solutions.

AAB, through OGE's Institute for Ethics in Government, also develops and provides substantive training to agency ethics officials and OGE staff to help them attain the knowledge and skills necessary to carry out the duties of their position.

GENERAL COUNSEL & LEGAL POLICY DIVISION

The General Counsel and Legal Policy Division (GCLPD) is responsible for (1) establishing and maintaining a legal framework for the executive branch ethics program, (2) providing assistance to the President and Senate in the Presidential appointments process; and (3) managing the incumbent public financial disclosure program.

The Ethics Law and Policy Branch (ELPB) develops, drafts, and issues all executive branch ethics regulations. ELPB also reviews agency-specific regulations supplementing executive branch ethical standards. When appropriate, ELPB drafts recommendations for changes in the conflicts of interest and ethics statutes. ELPB sets forth executive branchwide policy and interpretive guidance of the executive branch ethics laws and regulations.

ELPB also publishes written guidance in the form of Legal Advisories to promote consistent interpretation and application of the ethics laws, regulations, and policy guidance across the entire executive branch.

The Presidential Nominations Branch (PNB) works closely with the White House and agency ethics officials to help prospective Presidential nominees to Senate-confirmed positions comply with the extensive financial disclosure requirements of the Ethics in Government Act. PNB carefully evaluates a nominee's financial disclosure report and works with an agency ethics official to prepare an individualized ethics agreement to avoid and resolve potential conflicts of interest before a nominee enters government service. PNB also reviews the financial disclosure reports of the most senior White House staff members.

The Incumbent Financial Disclosure Branch (IFDB) ensures that executive branch leaders who have been appointed by the President and confirmed by the Senate, as well as Designated Agency Ethics Officials, remain free of conflicts of interest after they take office by collecting and analyzing their annual, termination, and periodic transaction public financial disclosure reports. IFDB reviews each report to ensure completeness and to resolve potential conflicts of interest. IFDB posts these reports to OGE's website.

COMPLIANCE DIVISION

The Compliance Division (CD) is responsible for (1) monitoring and reviewing agency ethics programs to ensure compliance with applicable ethics requirements established by statutes, rules, regulations, and Executive Orders; (2) managing elements of the public financial disclosure program; and (3) supporting OGE's administrative operations.

The Program Review Branch (PRB) exercises oversight of the executive branch ethics program through ethics program reviews. Ethics program reviews are designed to ensure consistent and sustainable ethics program compliance with established executive branch ethics laws, regulations, and policies, and to provide

recommendations for meaningful program improvement. To learn more about ethics program reviews, see Ethics Program Reviews.

PRB also monitors compliance with ethics agreements made by Presidential Appointees during their Senate confirmation process to ensure commitments made to resolve potential conflicts of interests are timely met and appropriately resolved.

Additionally, PRB is responsible for reviewing agency requests to institute alternative financial disclosure procedures and exempt Schedule C employees from public financial disclosure requirements.

The Administrative Operations Branch (AOB) is responsible for providing overall administrative and legal compliance support to OGE. AOB is responsible for (1) ensuring compliance with administrative requirements for agencies; (2) overseeing human resources functions; (3) purchasing and contracting; and (4) property management and other administrative programs. The Deputy Director for Compliance is supported by a Human Resources Officer and specialists in the Department of Treasury's Bureau of Fiscal Service and other agencies that perform services through interagency shared services agreements.

INFORMATION TECHNOLOGY DIVISION

The Information Technology Division is responsible for providing the cost-effective information technology infrastructure and services necessary to support the agency's mission while implementing appropriate security controls to protect the confidentiality, integrity, and availability of the agency's data and information systems.

APPENDIX II

DEFINITION OF STRATEGIC PLANNING TERMS

MISSION STATEMENT

A brief, easy-to understand narrative, usually no more than a sentence long. It defines the basic purpose of the agency and is consistent with the agency's core programs and activities expressed within the broad context of national problems, needs, or challenges.

STRATEGIC GOALS

Statements that articulate general long-term outcomes that an agency hopes to achieve for the major functions and operations of the agency. They should address the broader impact desired by the organization.

STRATEGIC OBJECTIVES

Statements that reflect the specific impact the agency aims to achieve under a certain goal. Objectives are tied to a set of performance goals and indicators established to help the agency monitor and understand progress.

CROSSCUTTING OBJECTIVES

A type of strategic objective that is not directly tied to a single strategic goal, but may be tied to several or none. In some circumstances agencies perform statutory or crosscutting activities that are not closely tied to a single strategic goal.

STEWARDSHIP OBJECTIVES

Statements that communicate improvement priorities for management functions such as strategic human capital management, information technology, sustainability or financial stewardship.

STRATEGIES

Statements that describe the approaches or practices an agency plans to employ to make progress on strategic objectives.

INDICATORS

Broad-based metrics that show whether desired outcomes are trending in the desired direction.

MEASURES

Metrics that help determine the impact or influence activities have on outcomes. Specific targets are associated with them. They can be quantitative or qualitative in nature.

EXTERNAL FACTORS

Situations and circumstances (environments) that can influence program results and outcomes, not within the control of the agency.

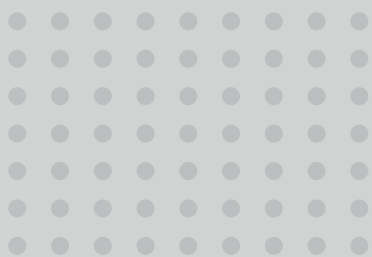
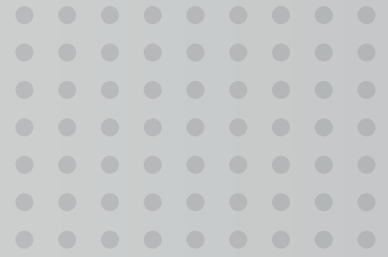
EXTERNAL PARTNERS

Foreign and domestic governments and private agencies, organizations, or entities that contribute to the achievement of an agency objective.

APPENDIX III

SUMMARY OF CONSULTATION EFFORTS

To develop the Strategic Plan (Plan), OGE used a participatory and inclusive process to develop the Plan that included input from a wide array of key stakeholders. The agency conducted focus groups with staff and senior leadership to develop the goals, objectives, and strategies in the Plan. The agency also sought feedback from the Congress, executive branch ethics officials, federal employee affinity groups, the American public, and government watchdog groups. A preliminary draft of the Plan was posted on OGE's public website, posted to Twitter and published in the Federal Register. Lastly, OGE also held a listening session open to the public. The current Plan reflects feedback provided to OGE by these internal and external stakeholders.



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch