

HEARING BEFORE THE HOUSE COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM
SUBCOMMITTEE ON GOVERNMENT OPERATIONS

“MERIT SYSTEMS PROTECTION BOARD, OFFICE OF GOVERNMENT ETHICS,
AND OFFICE OF SPECIAL COUNSEL REAUTHORIZATION”

DECEMBER 16, 2015

TESTIMONY OF WALTER M. SHAUB, JR.
DIRECTOR, U.S. OFFICE OF GOVERNMENT ETHICS

Chairman Meadows and members of the Subcommittee, thank you for the invitation to appear today to talk about the reauthorization of the U.S. Office of Government Ethics (OGE). I would like to take this opportunity to discuss OGE’s important work in support of the executive branch ethics program and to highlight some of our accomplishments since our most recent reauthorization expired in 2007. I would also like to tell you about the critical role that OGE will play in the next Presidential transition. The Presidential transition will present both a significant challenge and an opportunity for OGE, with the objective of helping to ensure the continuity of government at a critical time when most of the government’s top leadership posts will be vacant.

I. The Executive Branch Ethics Program

Although the roots of the executive branch ethics program go back further, a key point in time was 1978, when sweeping civil service reforms in the post-Watergate era were enacted under the Civil Service Reform Act. That year, OGE was established by the Ethics in Government Act, which came out of the same committee in the same month as the Inspector General Act. Though initially established as part of the Office of Personnel Management, OGE became a separate agency on October 1, 1989.

Under the Ethics in Government Act, OGE is charged with the unique mission of supervising the government’s efforts to prevent conflicts of interest. OGE undertakes this important mission as one piece of a framework for institutional integrity that is coordinated among a variety of agencies and entities in the executive branch. This broad framework reaches beyond OGE’s purview and includes merit system protections in the civil service; fair competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement. With combined staffs of approximately 14,000 employees, the executive branch’s Inspectors General are well equipped to investigate potential ethics violations. Each agency has enforcement authority to address violations by imposing administrative penalties such as suspensions, demotions, and terminations. In addition, the Department of Justice has enforcement authority that includes civil and criminal penalties.

The Ethics in Government Act grants OGE responsibility for providing “overall direction of executive branch policies related to preventing conflicts of interest on the part of officers and

employees of any executive agency.” As the statutory language makes clear, the primary objective of the executive branch program is one of *prevention*.

This program works to ensure that public servants make impartial decisions based on the interests of the public when carrying out the governmental responsibilities entrusted to them and serve as good stewards of public resources. Toward this goal, the program’s mission centers on preventing conflicts of interest and the appearance of conflicts of interest that stem from: financial interests; business or personal relationships; misuses of official position, official time, or public resources; and the receipt of gifts. The systems in place to prevent conflicts of interest, including financial disclosure systems and training, establish a foundation on which to build and sustain an ethical culture in the executive branch.

OGE is the supervising ethics office over the decentralized ethics program established by the Ethics in Government Act. While the statute does not give OGE direct supervisory control over agency ethics officials, OGE issues ethics regulations and interpretive guidance that define the contours of their work. OGE oversees a financial disclosure program covering approximately 26,000 public filers and 380,000 confidential filers. OGE also provides ethics officials with training to promote consistency and uniformity in the application of these regulations to the workforce of 2.7 million federal civilian employees across the executive branch. In addition, OGE conducts program reviews to ensure that executive branch agencies have established appropriate procedures to implement the statutory and regulatory requirements.

Although specialized, the work performed by OGE’s 70-person staff covers a surprisingly wide range of activities for such a small agency. Speaking broadly, most of our work to achieve uniformity, continuity and transparency in the ethics program can be grouped into the following major categories: (1) Presidential nominations and support for Presidential transitions; (2) regulations and interpretive guidance; (3) oversight of agency ethics programs; (4) development of the electronic filing system for public financial disclosure required by the STOCK Act of 2012; (5) direct assistance to stakeholders; (6) ethics education; and (7) engaging senior leaders on the importance of compliance and ethical culture. I will tell you a little about our accomplishments in each of these areas of our work. I will also describe new approaches we have taken and ways in which we have innovated since I became Director in January 2013 to improve OGE’s effectiveness and efficiency in accomplishing its important mission.

1. Presidential Nominations and Support for Presidential Transitions

OGE provides an independent review of the financial disclosure reports of candidates for the highest level positions in the executive branch: Presidentially appointed, Senate-confirmed nominees and candidates for the Office of the President of the United States. OGE is not involved in recruitment, background investigations, or political vetting. OGE makes sure that the nominees and Presidential candidates have complied with the extensive requirements for financial disclosure under the Ethics in Government Act. These requirements are highly complex, and ensuring full compliance is labor-intensive. OGE’s goal with regard to a nominee’s disclosures is to ensure that the Senate receives a complete accounting of relevant financial interests in order to facilitate its advice-and-consent role in considering the President’s nominees. The goal as to a Presidential candidate is to provide the electorate with similar information.

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. We approach this function from the perspective of managing risk. To that end, we require nominees to reduce the potential for ethical issues to arise in the first place, and we prescribe mechanisms for addressing conflicts of interest if issues do arise. In evaluating the potential risks, we consult with agency ethics officials who are familiar with their agencies' programs and activities. Based on these consultations, we prepare an ethics agreement that describes the steps a nominee will take to avoid conflicts of interest. After confirming with the agency that there are no unresolved conflicts of interest, we then transmit the package directly to the Senate.

The nominee function is never more important than during a change of Presidential administrations. A Presidential transition is a critical time when the nation is vulnerable, with the potential for manmade, natural, or economic disasters to strike while the government's top leadership positions are vacant. OGE works expeditiously to make sure that prospective candidates are free of conflicts of interest, so that top leadership positions can be filled quickly. During a Presidential transition, the nominations going through OGE typically triple in volume and increase in complexity.

To manage this challenge, OGE must prepare for the possibility of a transition every four years. Starting two years before a transition, we begin training additional staff members to review nominee packages. One year out from the inauguration, we step up both our internal training and the training we provide to agency ethics officials. At that point, the training focuses both on reviewing nominees and on counseling outgoing officials on the legal restrictions applicable to them when they are seeking post-government employment and after they leave government. In the year after a Presidential election, we necessarily draw down on other program activities in order to commit additional resources to managing the volume of transition-related work. When a sitting President is reelected, the increased volume of work is challenging, due to the turnover of appointees between the first and second terms. When a new President is elected, however, the challenge is nothing short of extraordinary, and delivering on the promise of a smooth transition demands a full commitment of resources.

With an election coming in November 2016, OGE's transition preparations are already well under way. We are conducting extensive training of our own staff, and we have scheduled similar training for agency ethics officials. We have also streamlined our processes, and our nominee program is currently operating at an unprecedented level of efficiency. One innovation since the time of our last reauthorization is a comprehensive 75-page ethics agreement guide that has sped up the process of resolving potential conflicts of interest and increased the uniformity of nominee ethics agreements across the executive branch. This innovation, coupled with our ethics agreement tracking efforts, increases accountability for Presidential nominees coming into the government. We have also developed a highly complex workflow feature in our electronic filing system, *Integrity*, that enables us to review nominee packages electronically. We began using this feature in November, and we anticipate that it will help us greatly during the Presidential transition. In March 2016, we will also convene another National Government Ethics Summit, and the focus of that event will be the Presidential transition.

At the same time, we have been communicating with other service providers and stakeholders who will be our partners in the Presidential transition. We are working with the General Services Administration (GSA), the Office of Personnel Management (OPM), and the National Archives and Records Administration (NARA) to coordinate transition preparations. We have also been working closely with the Partnership for Public Service, a non-partisan group that has been active in promoting efforts to ensure a smooth transition. In this effort, we have obtained input from individuals who were active in Presidential transitions on behalf of President Bush and President Obama, respectively.

Finally, we have been working with representatives of Presidential candidates in connection with their financial disclosure reports and preparing to work with the Presidential transition team. We are currently finishing work on a guide that the Presidential transition team and later the new Presidential administration will be able to provide to their nominees, and we will create a booklet for use by members of the Presidential transition team. We are also contributing material for a similar guide being prepared by the Partnership for Public Service and for a transition website maintained by GSA. In addition, we are finalizing a completely overhauled online guide on financial disclosure that will support nominees and other filers, as well as ethics officials, in preparing and reviewing financial disclosure reports.

2. Regulations and Interpretive Guidance

The next major category of OGE's mission involves ensuring uniformity in the executive branch ethics program through interpretive guidance and regulatory work. OGE issues and administers regulations that are applicable to all executive branch agencies, including the Standards of Conduct for Employees of the Executive Branch and regulations implementing the conflict of interest laws, among others. The most significant regulatory development since OGE's last reauthorization is the issuance of a comprehensive regulation implementing revolving-door restrictions. In the past two years, OGE has also carried out a significant regulatory modernization project reevaluating and drafting updates to several other significant parts of OGE's regulations, including restrictions on gifts and seeking employment, in part to implement the STOCK Act. All of these recent regulatory activities have involved extensive consultations with agency ethics officials to capture the best thinking and expertise of the entire community of ethics officials. In addition, OGE oversees the establishment of supplemental ethics regulations requested by individual agencies to address agency-specific issues. Currently 52 agencies have established supplemental regulations with OGE's concurrence.

With regard to interpretive guidance, since the time of our most recent reauthorization, OGE has issued and made publicly available more than 100 legal advisories, 30 program advisories, a highly detailed financial disclosure guide, an ethics agreement guide, an updated ethics agreement guide, and dozens of summaries of key subjects related to government ethics. This guidance is used by ethics officials throughout the executive branch, as well as by outside entities that interact with the government. In addition, OGE has worked with agencies to develop or distribute materials addressed directly to the government employees who are covered by the ethics rules. Feedback on OGE's work has been highly favorable. For example, in response to a survey OGE conducted this year, 98.6% of Designated Agency Ethics Officials (DAEOs) and

Alternate DAEOs, as well as 95.9% of agency ethics officials who responded, indicated that OGE's legal advisories help them perform their jobs.

3. Oversight of Agency Ethics Programs

OGE's most significant oversight activities with regard to agency ethics programs include conducting agency ethics program reviews, issuing an annual executive branch-wide data call, examining financial disclosures of high level officials reviewed by the agencies, and monitoring compliance with ethics agreements by Senate-confirmed appointees.

As part of OGE's process of conducting program reviews, we routinely make specific recommendations for improving individual agency ethics programs, and we hold the agencies accountable by monitoring their efforts to implement our recommendations. I took a new approach to this work by establishing a methodology that allows us to more regularly and timely conduct these important reviews. We have also refined our review processes in order to provide increased support to agencies in making program improvements. This past year, OGE issued 59 reports on its reviews of agency programs and is on pace to review all executive branch agencies during my five-year term. We make every one of these program review reports available to the public on OGE's website.

The annual data call is a comprehensive questionnaire about the composition and activities of each agency's ethics program that provides invaluable oversight data. Recognizing the value of this material to a wider audience, in 2014 we published on OGE's website for the first time a summary of aggregate data from the agencies' responses. In 2015, we posted all of the raw data from agency responses in order to be even more transparent. Currently, we are working with the Merit Systems Protection Board to survey a statistically significant sample of federal employees throughout the executive branch to learn more about the strength of agency ethics programs.

OGE's review of the financial disclosure reports of hundreds of high level officials is another oversight mechanism. When I became Director, I focused on improving this important mechanism because timely review is necessary to detect and resolve conflicts of interest. Since my appointment, OGE has improved its efficiency by going paperless and reducing its average review time for annual and termination reports from over 180 days to less than 30 days. Notably, these improvements were achieved at a time when, due to new STOCK Act reporting requirements, OGE also received approximately 900 periodic transaction reports. OGE's second-level review is a quality control mechanism to ensure that agencies are timely reviewing these reports for conflicts of interest and to ensure the filers' compliance with their ethics agreements. In January 2015, we also began to issue year-end status reports to agency heads regarding the status of their agency's efforts to review the financial disclosure reports of Senate-confirmed appointees. These "report cards" have generally resulted in agencies getting annual filings to OGE earlier in 2015 than in prior years.

4. Development of the Electronic Filing System for Public Financial Disclosure Required by the Stop Trading on Congressional Knowledge Act of 2012

The STOCK Act created significant new legal requirements for OGE and the executive branch ethics program, resulting in a permanent increase in workload across all of OGE's functions. The most significant of these requirements tasked OGE with developing an electronic filing system for the approximately 26,000 executive branch public financial disclosure filers.

Although quite a significant undertaking for a small agency like OGE, I am pleased to report that on January 1, 2015, we successfully launched *Integrity*, a secure, web-based electronic filing system for the executive branch. OGE named its new electronic filing system "*Integrity*" to emphasize to users the importance of financial disclosure for preventing conflicts of interest. OGE contributed its own extensive financial disclosure expertise to develop a system that significantly enhances the filing, review, and program management aspects of the executive branch public financial disclosure program. A combination of smart data-entry tables and context-dependent questions helps filers disclose all of their reportable financial interests with increased accuracy. *Integrity* enables agency ethics officials to assign, review, track, and manage reports electronically. OGE also focused on ensuring the security of user access and maintaining data. Notably, *Integrity* is hosted in a secure government cloud and has successfully undergone a full, independent security assessment. Both *Integrity*'s authentication provider and host are authorized under GSA's Federal Risk and Authorization Management Program (FedRAMP). Using a shared-services model with operational funding in OGE's budget, OGE is continuing to make *Integrity* available to executive branch agencies without charge, thereby reducing duplication and fragmentation within the executive branch.

In less than a year, we have registered 88 agencies and nearly 10,000 filers in the system. Our first major test came during the 2015 annual financial disclosure cycle, and the results exceeded our greatest expectations. Based on feedback from current agency users, *Integrity* has already resulted in more accurate and complete public financial disclosures. We also received a 90% favorable rating from agency administrators who responded to a satisfaction survey.

5. Direct Assistance to Stakeholders

OGE provides direct assistance to stakeholders in the executive branch ethics community. The primary recipients of this support are agency ethics officials, who are responsible for providing ethics services to the 2.7 million civilian employees at the more than 130 executive branch agencies. OGE's Desk Officers assist agency ethics officials in evaluating complex issues, provide information about how other agencies are implementing ethics requirements, and give guidance on OGE's policies regarding program activities. The Desk Officers are also able to assist agencies in implementing the recommendations that OGE makes through its program reviews. To enhance OGE's staff expertise to perform this complex work, I launched an aggressive Employee Development Program. As a result, feedback about Desk Officer responses to the nearly 2,000 requests for assistance received this year was very favorable: 91% of respondents to OGE's executive branch-wide customer satisfaction survey indicated that the assistance provided by OGE's Desk Officers has been effective in helping them do their jobs. In addition, OGE leverages technology by using information collected through Desk Officer

interactions in order to make data-driven decisions about how best to serve agency ethics programs and identify agencies in need of special outreach.

OGE also actively supports the investigative and enforcement communities. For example, As Director of OGE, I serve as a statutory member of the Council of the Inspectors General on Integrity and Efficiency (CIGIE), the body that addresses integrity, economy and effectiveness issues across government, and aids in developing a professional and highly skilled workforce in Offices of Inspectors General. As Director of OGE, I participate in CIGIE's monthly meetings and have had the pleasure of making two presentations to the Council. As Director, I also serve as a statutory member of CIGIE's Integrity Committee, which investigates allegations against individual Inspectors General. On a day to day basis, OGE also works closely with Inspectors General who request assistance in interpreting the complex ethics laws and regulations in connection with investigations. In addition, OGE actively provides training for investigators in Offices of Inspectors General throughout the executive branch. OGE has provided similar assistance and training to prosecutors and the staffs of U.S. Attorneys, including occasions when investigations have led to prosecutions and civil penalty enforcement. Finally, with information provided by U.S. Attorneys, OGE publishes an annual prosecution survey to raise awareness of the consequences of violating ethics laws.

OGE responds to numerous contacts from other outside sources, such as non-governmental organizations, government contractors, the media, and individual members of the public. We also regularly provide technical assistance to Congressional committees in connection with legislation directly or indirectly related to ethics issues. Similarly, we provide support for the State Department's international anti-corruption work. Since OGE's last authorization, OGE has briefed hundreds of delegations comprised of thousands of foreign officials about the executive branch's ethics program at the request of the State Department. OGE also regularly provides the State Department with substantial support for the United States' participation in anti-corruption mutual evaluation mechanisms designed to monitor compliance with international anti-corruption standards.

In my time as Director, OGE has also undertaken a significant effort to improve stakeholder awareness and communications. Internal to the government, OGE has directed communications efforts toward officials whose activities intersect with the ethics program. OGE initiated a forum of ethics officials from the four supervising ethics offices of the three branches of the federal government, which now meets regularly to share expertise and address common issues. OGE also recently actively engaged with the employee relations community, who are key partners in the administrative enforcement of ethics violations. Externally, OGE has been focusing on ensuring that its communications through social media, its website, and the media are carefully tailored for our external stakeholders. These communications provide stakeholders with a greater understanding of OGE's work and help create opportunities for coalition-building and collaboration with key external partners such as government watchdogs and private sector compliance practitioners. In support of these efforts, I have personally posted 30 articles to educate the public about OGE's work in a section of our website called "Director's Notes."

6. Ethics Education

A fundamental way that OGE ensures uniformity and helps agencies prevent conflicts of interest and other ethics concerns is by training the community of roughly 4,500 executive branch ethics officials. This work is of vital importance and has been a focus of mine as Director. OGE teaches them how to review financial disclosure forms for conflicts of interest, provide advice and counseling on the ethics rules, train their agencies' employees on applicable ethics obligations, and promote an ethical culture within their organizations. For example, OGE faced the challenges of a large and geographically dispersed audience with limited resources. As a result, OGE pursued an aggressive reinvention of its approach to delivering training. Since I became Director, we have leveraged technology to steadily increase our reach from an average of about 1,400 registrations per year in the first five years after OGE's last authorization to more than 7,500 registrations in fiscal year 2015. In addition, OGE has innovated by helping agency ethics officials provide critical ethics training to the millions of employees in the executive branch. OGE hosts training development workshops to bring ethics officials together to create relevant, targeted, and effective ethics training products. We then share those and other agency and OGE-created products through a variety of means including our virtual training products library, and distance learning events. In turn, the approximately 4,500 agency ethics officials provide annual ethics training to approximately 450,000 federal employees, as well as ethics orientations to all new employees. This exchange improves the efficiency, effectiveness and uniformity of training while reducing redundancy and minimizing costs.

During my tenure, OGE has also found ways to reinvent its traditional training conference. By leveraging federal space and technical support offered by agency partners, we held our first National Government Ethics Summit in 2014 for approximately 500 in-person and 4,000 virtual attendees for only about \$10,000, or less than 1% of the cost of previous traditional ethics conferences. This event and many of our routine training efforts are also more transparent than ever. The National Government Ethics Summit and dozens of our regular training courses have been streamed live on our YouTube and Google+ channels, where they remain available as on-demand training courses to any ethics official or citizen with an internet connection. The Summit presentations alone have been viewed more than 5,500 times. Even in the area of traditional classroom instruction, OGE has found opportunities to increase efficiency. OGE has implemented a certification program that allows agency ethics officials, at no cost to their agencies, to teach OGE's courses to other ethics officials and to employees in their agencies. This program reduces redundant course and training material development while promoting accuracy and consistency in the ethics training across government.

We have not only expanded the reach of our ethics education program, cut costs, and enhanced transparency; we have also made sure that these educational efforts meet the highest standards of quality. More than 90% of respondents consistently report being better able to do their jobs as a result of attending our training events.

7. Engaging Senior Leaders on the Importance of Compliance and Ethical Culture

OGE has a unique role and responsibility in bringing visibility and awareness of the importance of ethics to the highest levels of leadership of the government. We accomplish this in

a number of important ways. Since I became Director, OGE has recognized the value of leveraging its work with nominees and supporting Presidential transitions to introduce incoming agency leaders to the executive branch ethics program. We continue to underscore with these leaders the necessity of a strong ethics program through our oversight activities, such as program reviews, as well as through direct communications, such as our annual reports to agency leaders on the status of each agency's annual financial disclosure program. But our work does not end there. During my tenure we have continued to seek new opportunities to engage leadership on ethics and to explore emerging trends. For example, I have offered to meet personally with new agency heads to encourage them to take an active role in their agencies' ethics programs and to inform them about the support OGE can provide in that endeavor. I have also tasked OGE's education group to continue creating innovative tools and products that can be used by agency ethics officials to reinforce the message with their leadership that an ethical culture must be supported at the very top echelons of government in order to be successful. OGE has also begun offering training that incorporates emerging trends in ethics, such as enterprise risk management and the role of a strong ethics program in reducing risk.

OGE helps to create a management culture across government that incorporates values-based decision making. For example, OGE has provided recommendations to the Office of Management and Budget to incorporate ethics and ethics officials in their guidance to agencies for establishing Enterprise Risk Management (ERM) frameworks. These recommendations have already created opportunities for ethics officials to engage with their agency leadership through the ERM process. Whenever we see these opportunities, we communicate them to senior ethics officials through a variety of means including traditional and distance learning events. OGE's two most recent distance learning events on ERM reached more than 250 ethics officials.

At its heart, the executive branch ethics program is a values-based program. The fourteen principles of ethical conduct, first set out by President George H. W. Bush in Executive Order 12674, are the shared values of public service that capture the spirit of public service in the nation. Building on these principles, OGE has actively promoted an ethical culture and public confidence through transparency and communications. OGE has consistently encouraged agencies to innovate in pursuit of stronger ethical culture and to share with the executive branch ethics community the results of their innovations. OGE has also conducted training sessions and live-streaming broadcasts to disseminate these innovations. Through collaboration, communication, and transparency, OGE aims to sustain a government in which ethical values are embodied by leaders, integrated into agency management, supported by organizational cultures, and safeguarded by enforceable rules.

II. Reauthorization

As you can tell from this discussion of our work, OGE is a small agency with a big mission of prevention. OGE's purpose is to bring uniformity, continuity and transparency to the executive branch ethics program through enforceable standards, financial disclosure, advice and counsel, education, and oversight. The agency's success in carrying out this wide range of activities is the product of hard work and exemplary dedication of our staff of 70 employees. At one point in its history, OGE's funding enabled it to carry out the same work with over 100 employees. Nevertheless, our more streamlined staff has excelled by taking on cross-functional

responsibilities that reach across branches and divisions. We deploy our resources to the functions needing the most attention. As with the financial disclosure cycle and the Presidential transition cycle, these shifting demands are often predictable and can be managed through careful planning. Other times, the ebb and flow of work is less predictable, but we have shown that we can adapt to changing circumstances. I think OGE's results speak loudly to that point.

With this background on OGE's important prevention work and the framework in which we operate, I ask that the U.S. Office of Government Ethics be reauthorized for a period of seven years, from 2016 through 2022. This seven-year timing would avoid the risk of the next reauthorization effort coinciding with a Presidential transition, a time when OGE's resources will be stretched thinnest. In addition, I ask that OGE be authorized such amounts as needed to carry out the Ethics in Government Act, as has been the case over the past two decades since 1996. OGE is also seeking a limited number of technical corrections to the Ethics in Government Act to more accurately reflect current law and practice. A draft of our proposed reauthorization bill and summary has been provided informally to your staff. I thank you for the opportunity to testify today about OGE's unique role and important work in preventing conflicts of interest in the executive branch. I am happy to answer any questions you may have.

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BIOGRAPHY OF WALTER M. SHAUB, JR.
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Walter M. Shaub, Jr.
Director, Office of Government Ethics

The Honorable Walter M. Shaub, Jr. heads the U.S. Office of Government Ethics (OGE). His five-year term as OGE’s Director began in January 2013. Prior to that appointment, he was a career member of the federal Senior Executive Service. He served in OGE as Deputy General Counsel from 2008 to 2013 and as the supervisory attorney responsible for OGE’s Presidential nominations program from 2006 to 2008. From 2004 to 2006, he worked as an attorney with the law firm Shaw, Bransford, Veilleux and Roth, P.C., where he focused on federal employment law. Previously, Mr. Shaub served as a staff attorney at several federal agencies, including OGE from 2001 to 2004, the Central Office of the U.S. Department of Veterans Affairs (VA) from 2000 to 2001, the Office of General Counsel of the U.S. Department of Health and Human Services from 1998 to 2000, and the VA’s Baltimore-Washington Regional Counsel’s office from 1997 to 1998. He earned his law degree, *cum laude*, from American University’s Washington College of Law, and he earned a Bachelor of Arts in History from James Madison University.