



A MESSAGE FROM THE ACTING DIRECTOR

I am pleased to present the *Strategic Plan* of the U.S. Office of Government Ethics (OGE) for fiscal years 2018 through 2022. This *Plan* reflects OGE's commitment to its important mission of preventing conflicts of interest in the executive branch. Government leaders and employees take actions and make decisions every day that affect the wellbeing of citizens and people around the world. It is critical to our democracy that the people trust that those decisions are made based on the public interest rather than one's personal interests.

To that end, OGE commits to the important strategic goals of:

- Advancing a strong, uniform executive branch ethics program;
- Holding the executive branch accountable for carrying out an effective ethics program;
- Contributing to the continuity of senior leadership in the executive branch; and
- Engaging the public in overseeing government integrity.

Ensuring the impartiality of executive branch decisionmaking and enabling the public's trust in its government is imperative and our shared responsibility to our democracy. OGE looks forward to working with all of its stakeholders to make progress on these important goals toward accomplishing its mission.

Sincerely,

A handwritten signature in black ink that reads "David J. Apol". The signature is written in a cursive, flowing style.

David J. Apol
Acting Director and General Counsel

STRATEGIC PLAN



FISCAL YEARS
2018
—22

UNITED STATES
OFFICE OF
GOVERNMENT
ETHICS

MISSION

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

PART I – OGE’S MISSION

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

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

“Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.” 5 CFR § 2635.101

PART II – ORGANIZATIONAL STRUCTURE

Institutional Integrity in the Executive Branch

The Ethics in Government Act charges OGE with leading the effort to prevent conflicts of interest in the executive branch. OGE undertakes this important prevention mission as part of a framework comprising



Figure 1: Institutional Integrity

executive branch agencies and entities whose work focuses on institutional integrity. In addition to Government ethics, this framework includes merit system protections in the civil service; full and open competition in procurement; fiscal controls; transparency programs; investigation of waste, fraud, and abuse; and criminal, civil, and administrative enforcement. Potential violations of legal authorities

established under this framework, including Government ethics authorities, are primarily investigated by the thousands of Inspectors General staff members across the executive branch. In addition, the Department of Justice has enforcement authority that includes both civil and criminal penalties.

Within this framework, the ethics program works to ensure that public servants impartially carry out the governmental responsibilities entrusted to them, and that they serve as good stewards of public resources. Toward these goals, the mission of the ethics program centers on preventing conflicts of interest and the appearance of conflicts of interest that stem from financial interests, business or personal relationships, misuse of official position, official time, or public resources, and the receipt of gifts.

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

OGE and Executive Branch Agencies

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

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



Figure 2: OGE and the Executive Branch

How OGE Provides Leadership and Oversight

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

- Promulgates, maintains, and advises on enforceable standards of ethical conduct for the nearly 3 million employees in over 130 executive branch agencies, including the White House;
- Oversees a financial disclosure system that reaches more than 26,000 public and more than 380,000 confidential financial disclosure report filers;
- Ensures that executive branch agency ethics programs are in compliance with applicable ethics laws and regulations;
- Provides education and training to the nearly 5,000 ethics officials executive branch-wide;
- Conducts outreach to the general public, the private sector, and non-governmental organizations; and
- Provides technical assistance to the Congress, state, local and foreign governments, associations, and international organizations.

OGE's greatest resource is its multidisciplinary staff of attorneys, ethics and financial experts, and other key personnel. OGE is a lean organization, operating at fewer than its 80 authorized full-time equivalents. OGE is led by a Director who is appointed to a five-year term by the President and confirmed by the Senate. As shown in the organizational chart, in addition to the Office of the Director, OGE is divided into four divisions that work together to carry out OGE's mission.



Figure 3: OGE Organizational Chart

PART III – STRATEGIC GOALS AND 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, nine strategic objectives, and three management objectives.

OGE’s four strategic goals are (1) Uniformity; (2) Accountability; (3) Continuity; and (4) Engagement. 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.

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

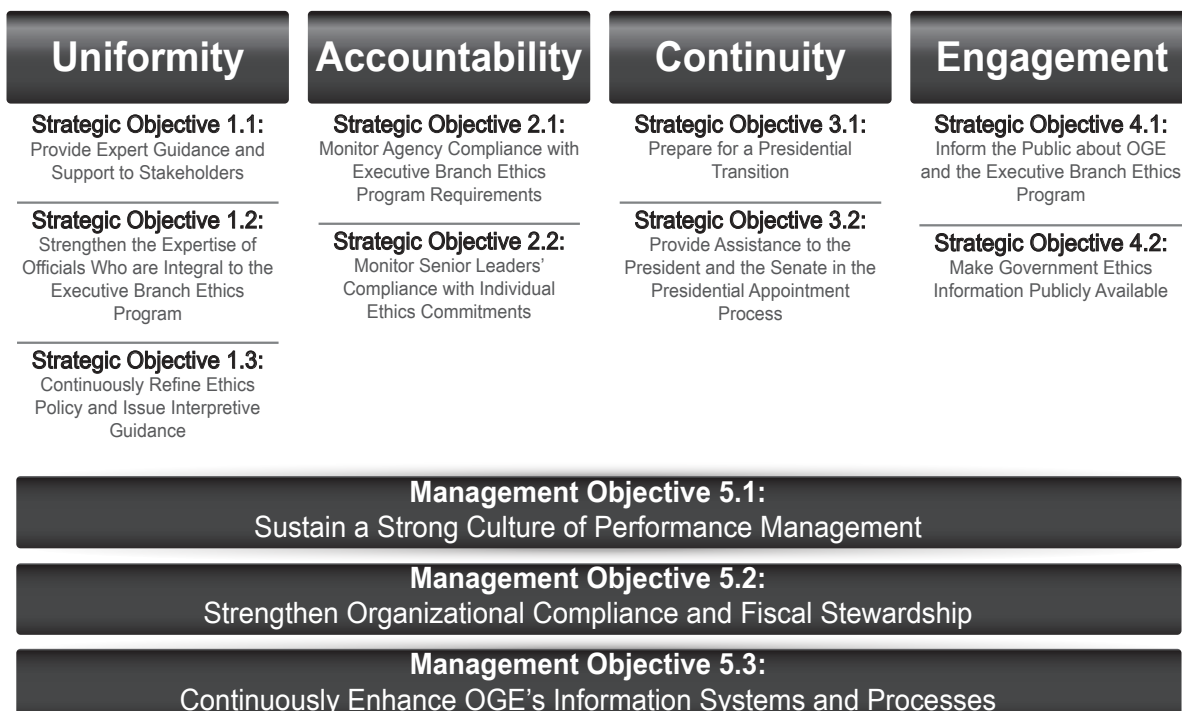


Figure 4: Strategic Goals and Objectives Framework

STRATEGIC GOAL

Advance a Strong, Uniform Executive Branch Ethics Program

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

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

These objectives are:

- (1.1) Provide Expert Guidance and Support to Stakeholders;*
- (1.2) Strengthen the Expertise of Officials Who are Integral to the Executive Branch Ethics Program; and*
- (1.3) Continuously Refine Ethics Policy and Issue Interpretive Guidance.*

STRATEGIC OBJECTIVE 1.1: ★

Provide Expert Guidance and Support to Stakeholders

OGE provides expert guidance and support to stakeholders to promote consistent interpretation and application of ethics laws and regulations across the executive branch. OGE will accomplish this objective through a variety of activities. Through its Desk Officer Program, OGE will continue to provide the nearly 5,000 agency ethics officials with instant access to expert advice in applying the ethics laws and regulations so that they may support the nearly 3 million federal employees in impartially carrying out their Government work. OGE will also continue to provide support to agencies and financial disclosure filers that use OGE's electronic financial disclosure system, Integrity, through orientations, training, and help desk services.

In addition to assisting executive branch ethics officials, OGE will continue to respond to requests for expert assistance and to direct outreach efforts toward other key stakeholders whose activities intersect with the ethics program. These stakeholders include the Congress, executive branch investigative and enforcement communities, and OGE's international counterparts.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 1.1.:

- Percent of ethics officials who believe OGE timely communicates ethics-related information
- Percent of ethics officials who believe OGE Desk Officer assistance helps them perform their job duties
- Number of requests for assistance from ethics officials and the number of requests for technical assistance from other stakeholders
- Percent of agency administrators satisfied with the support provided by OGE on its electronic public financial disclosure filing system

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 the executive branch ethics program. In addition to agency ethics officials who are directly tasked with ethics responsibilities, other officials such as agency leaders, Inspectors General, and human resources professionals each play a significant role in carrying out an effective ethics program.

To strengthen these officials' ethics expertise, OGE will continue to provide a variety of professional development opportunities. In particular, OGE will use high-return, low-cost methods of delivery, such as targeted intensive training, distance learning technologies, and the National Government Ethics Summit. Through these and other events, OGE will provide opportunities for ethics officials to collaborate with OGE and to learn from one another. In addition, OGE will continue to develop its library of ethics learning tools and provide insights on methods to improve program effectiveness.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 1.2.:

- Percent of ethics officials who believe, after participating in an OGE training event that they can more effectively perform their job functions
- Percent of ethics officials who believe, after using a learning tool provided by OGE that they can more effectively perform their job function
- 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

Executive branch ethics officials rely on OGE to provide clear policies and guidance on the laws and regulations, such as the criminal conflict of interest laws and Standards of Ethical Conduct for Employees of the Executive Branch, that serve as the building blocks of the executive branch ethics program. Therefore, OGE will continue to review its regulations for necessary revisions, refine its policies and guidance to address new requirements, respond to novel issues, and adapt to changes in the way government accomplishes its mission. OGE will also evaluate requests from agencies to tailor their ethics programs.

In addition, OGE will continue to work to ensure that its policies are sound and practicable, and that its guidance is understandable, clearly communicated, and disseminated widely. OGE will accomplish these objectives primarily through the publication of legal and program advisories, which provide necessary interpretive guidance on legal and program requirements.

EVALUATING PROGRESS

Examples of potential measures for Strategic Objective 1.3.:

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

STRATEGIC GOAL



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



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

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

These objectives are:

- (2.1) Monitor Agency Compliance with Executive Branch Ethics Program Requirements; and*
- (2.2) Monitor Senior Leaders' Compliance with Individual Ethics Commitments.*

STRATEGIC OBJECTIVE 2.1: ★ ★ ---

Monitor Agency Compliance with Executive Branch Ethics Program Requirements

OGE monitors agency compliance with executive branch ethics program requirements in order to mitigate program vulnerabilities at each agency and to identify executive branchwide trends. OGE will continue to evaluate agency ethics programs by conducting program reviews; and analyzing data collected annually from each agency about the administration of its ethics program.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 2.1.:

- Percent of cases in which a program weakness identified during an OGE program review results in improvements in the agency's ethics program
- Percent of agency ethics programs reviewed within established time frames

STRATEGIC OBJECTIVE 2.2: ★ ★

Monitor Senior Leaders' Compliance with Individual Ethics Commitments

OGE monitors senior Government leaders' compliance with individual ethics commitments to ensure that executive branch officials at the highest level conduct the Government's business impartially. OGE will continue working to ensure that executive branch leaders appointed by the President and confirmed by the Senate remain free of conflicts of interest after taking office. Specifically, OGE oversees the development of ethics agreements between agencies and nominees and tracks compliance with such agreements. OGE requires new senior leaders to certify in writing that they have taken actions to comply with their ethics agreements. After the appointee is nominated and confirmed, OGE also conducts second-level reviews of their annual, periodic transaction, and termination financial disclosure reports to ensure that agencies timely review these disclosures for conflicts of interest and that filers continue to comply with their ethics agreements.

EVALUATING PROGRESS

Examples of potential measures for Strategic Objective 2.2.:

- 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

STRATEGIC GOAL



Contribute to the Continuity of Senior Leadership in the Executive Branch



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

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

These objectives are:

- (3.1) Prepare for a Presidential Transition; and*
- (3.2) Provide Assistance to the President and the Senate in the Presidential Appointment Process.*

STRATEGIC OBJECTIVE 3.1: ★ ★ ★

Prepare for a Presidential Transition

OGE must prepare for the possibility of a full change in Administration after a Presidential election every four years. To prepare for a Presidential transition, OGE participates in federal transition councils, collaborates with other transition service providers, updates necessary resources, publishes legal advisories on relevant topics, and provides training on transition-related topics. OGE also works with representatives of Presidential candidates in connection with their financial disclosure reports and supports early transition efforts of a newly elected President.

EVALUATING PROGRESS

Examples of potential measures for Strategic Objective 3.1.:

- Actively engage and/or 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: ★ ★ ★ ---

Provide Assistance to the President and the Senate in the Presidential Appointment Process

Following a Presidential election and throughout an Administration, OGE continuously assists the President and the Senate in the Presidential appointment process. OGE provides an independent review of the financial disclosure reports of individuals being considered for the highest-level positions in the executive branch. OGE works with the White House and executive branch agencies to ensure that these individuals comply with the extensive requirements for financial disclosure under the Ethics in Government Act. OGE leverages its secure, web-based electronic filing system, Integrity, to improve the accuracy of the disclosures and the efficiency of the process. When potential financial conflicts of interest are detected, OGE identifies remedies to resolve them so that the President's appointees can carry out their duties free from those conflicts. Once this process is complete and the individual is nominated, OGE certifies the report and transmit the package of ethics documents to the Senate.

EVALUATING PROGRESS

Examples of potential measures for Strategic Objective 3.2.:

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

STRATEGIC GOAL

IV

Engage the Public in Overseeing Government Integrity



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

To achieve its strategic goal of engaging the public in overseeing Government integrity, OGE has developed two strategic objectives.

These objectives are:

- (4.1) Inform the Public about OGE and the Executive Branch Ethics Program; and*
- (4.2) Make Ethics Information Publicly Available.*

STRATEGIC OBJECTIVE 4.1: ★ ★ ★ ★

Inform the Public about OGE and the Executive Branch Ethics Program

OGE informs the public and other key stakeholders about OGE and the executive branch ethics program to raise awareness of and increase confidence in the systems in place to detect and resolve conflicts of interest. In support of this effort, OGE will refine its communication strategies, collaborate and engage with a broader array of stakeholders, timely respond to external requests for information and assistance, and provide relevant, understandable information to enable citizens to hold their Government accountable.

EVALUATING PROGRESS

Examples of potential indicators for Strategic Objective 4.1:

- 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

STRATEGIC OBJECTIVE 4.2: ★ ★ ★ ★

Make Government Ethics Information Publicly Available

OGE makes ethics information publicly available to increase public confidence in Government decisionmaking. Ethics information includes reports and data on agency ethics program compliance, the public financial disclosures and ethics agreements of senior leaders, and written policy guidance. OGE will direct its efforts toward improving existing datasets, identifying potential new datasets, streamlining the collection process of ethics information, posting documents timely, and making resources and information easy to locate and access. OGE will seek to improve stakeholders' understanding of the ethics resources and information available to them, as well as how to use these resource and information.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 4.2.:

- 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

MANAGEMENT OBJECTIVES



MANAGEMENT OBJECTIVE 5.1: *Sustain a Strong Culture of Performance Management*

OGE will sustain a culture of performance through continuous employee engagement and professional development, effective internal communication, creation and revision of necessary policies, employee and organizational accountability, process improvement, performance measurement, and quality human capital. OGE will strive to adapt and respond to ever-changing environments.

EVALUATING PROGRESS

Examples of potential indicators for Strategic Objective 5.1.:

- OGE's score on the Employee Engagement Index on the Federal Employee Viewpoint Survey
- Number of standard operating procedures updated or created

MANAGEMENT OBJECTIVE 5.2.: *Strengthen Organizational Compliance and Fiscal Stewardship*

OGE strengthens its organizational compliance and fiscal stewardship by continuously evaluating its practices and systems to identify areas in need of improvement. OGE will remain a responsible steward of taxpayer dollars as reflected by its existing track record of strong financial management. OGE will continue to pursue efficiencies, such as the economies of scale resulting from its use of shared service centers for a significant number of support services. OGE will also strive to remain compliant with the wide array of requirements applicable to federal agencies.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 5.2.:

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

MANAGEMENT OBJECTIVE 5.3.: *Continuously Enhance OGE's Information Systems and Processes*

OGE prioritizes its activities to continuously enhance and secure its information systems and processes. These systems and processes include OGE's executive branchwide electronic financial disclosure filing system, Integrity, as well as numerous internal applications, policies, and operating procedures. OGE will also maintain a strong, secure IT infrastructure, which is necessary to mitigate risk and to allow OGE to conduct its mission-critical work.

EVALUATING PROGRESS

Examples of potential measures and indicators for Strategic Objective 5.3.:

- Percent of downtime of Integrity, OGE's network, and website
- Results of Cybersecurity Risk Management Assessment
- Feedback from Integrity and website users

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. For example, prior to and immediately after a Presidential election, regardless of the outcome, OGE experiences a particularly large and varied workload, requiring it to shift resources to support the Administration in the Senate confirmation process. OGE must balance its vital role in ensuring that Presidential nominees for civilian positions requiring Senate confirmation are free of conflicts of interest with its mission-critical work that is not directly related to a transition. In addition, in fiscal 2017, OGE and the executive branch ethics program experienced a significant increase in stakeholder interest and resulting workload. It is uncertain whether these demands will continue in a manner that would affect the Plan.

OGE will use its available resources to make progress toward its objectives while navigating these and other external factors that may arise between 2018-2022.

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

PROGRAM COUNSEL DIVISION

The Program Counsel is the chief legal officer for the agency and the Chief of Staff with responsibility for managing all of OGE's operations and career personnel. The Program Counsel Division (PCD) is responsible for: (1) conducting outreach to OGE's stakeholders and the public; (2) overseeing executive branchwide strategic initiatives, such as the electronic filing system for financial disclosure; (3) directly supporting agency ethics officials through OGE's Desk Officers; (4) training agency ethics officials; (5) providing internal legal support to OGE; and (6) managing OGE's budget, performance, compliance, and legislative affairs programs.

The Legal, External Affairs, and Performance Branch (LEAP) provides agency-specific legal support to OGE. LEAP is responsible for strategic initiatives and manages OGE's budget, performance, compliance, and legislative affairs programs. LEAP oversees OGE's Freedom of Information Act, Privacy Act, and records management programs. LEAP also develops and delivers substantive government ethics training to agency ethics officials throughout the executive branch and to OGE's staff. In addition, LEAP conducts OGE's Annual Agency Ethics Program Questionnaire.

The Agency Assistance Branch (AAB) provides direct assistance 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 issues they encounter. In addition to responding to requests for advice, AAB Desk Officers actively communicate with the executive branch ethics community to address issues and challenges that are of common interest in order to arrive at and share collaborative solutions.

AAB also manages OGE's quarterly meetings with agency ethics program leaders and other forms of outreach to support agency ethics programs.

GENERAL COUNSEL & LEGAL POLICY DIVISION

The General Counsel is the chief legal officer supporting the Director with regard to the legal authorities for government ethics in the executive branch. The General Counsel and Legal Policy Division (GCLPD) is responsible for: (1) establishing and maintaining a legal framework for the executive branch ethics program through regulations and executive branchwide policy issuances; (2) providing interpretive guidance regarding Government ethics authorities to the executive branch; and (3) providing assistance to the President and Senate in the Presidential appointment process.

The Ethics Law and Policy Branch (ELPB) develops and issues the executive branch's ethics regulations. ELPB also reviews and authorizes agency-specific supplemental ethics regulations. ELPB publishes written guidance in the form of Legal Advisories, assists stakeholders in resolving complex ethics form of Legal Advisories, assists stakeholders in resolving complex ethics issues, and supports enforcement authorities—including the Department of Justice and Inspectors General—with regard to the consistent application of Government ethics laws and regulations. When appropriate, ELPB also drafts recommendations for changes in the conflicts of interest laws and other ethics statutes.

The Presidential Nominations Branch (PNB) works closely with the White House, the Senate, agency ethics officials, nominees, and nominees' representatives with regard to the ethics review of Presidential nominees for Senate-confirmed positions. PNB ensures compliance with financial disclosure requirements and assists in the resolution of potential conflicts of interest.

PNB carefully evaluates nominees' financial disclosure reports and works with agency ethics officials to prepare individualized ethics agreements. PNB also reviews new entrant disclosures by the most senior White House officials, as well as disclosures by major party candidates for the offices of President and Vice President.

COMPLIANCE DIVISION

The Deputy Director for Compliance is responsible for monitoring executive branch agencies for compliance with statutory and regulatory requirements for agency ethics programs. The Compliance Division (CD) monitors agency ethics programs to ensure compliance with applicable ethics requirements established by statutes, rules, regulations, Executive Orders, and policies. CD issues Program Advisories regarding the requirements for agency ethics programs. CD also conducts reviews of individual agency ethics programs and manages the executive branch-wide public financial disclosure program for Senate-confirmed Presidential appointees. In addition, CD evaluates requests from agencies regarding various discretionary program elements and serves as a repository for certain executive branch ethics documents.

The Program Review Branch (PRB) exercises systemic oversight of the executive branch ethics program through reviews of agency ethics programs. PRB's program review reports make specific recommendations to agencies for meaningful ethics program improvement, and PRB monitors agencies' implementation of those recommendations. PRB tracks individual compliance with ethics agreements and tracks criminal referrals to the Department of Justice. In addition, PRB makes determinations on requests for exclusions from public financial disclosure requirements and for alternate confidential financial disclosure procedures.

The Financial Disclosure Branch (FDB) ensures that senior government leaders are free of conflicts of interest by reviewing and analyzing their public financial disclosure reports following certification by agency ethics officials. These reports include new entrant, periodic transaction, annual, and termination public financial disclosure reports. In addition to reviewing these reports, FDB is responsible for releasing these reports to the public upon request and for publishing on OGE's website the reports of officials paid at Levels I and II of the Executive Schedule.

INTERNAL OPERATIONS DIVISION

The Associated Director for Internal Operations is responsible for providing overall technological, administrative and legal compliance support to OGE. The Internal Operations Division (IOD) is responsible for: (1) maintaining OGE's information technology systems, equipment, and security; (2) creating and operating network applications; (3) ensuring compliance with administrative requirements for agencies; (4) overseeing human resources functions; (5) purchasing and contracting; and (6) property management and other administrative programs.

The Assistant Director 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.

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.

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 government 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 utilized 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, the American public, and Government watchdog groups.

A preliminary draft of the Plan was posted on OGE's public website and a Federal Register notice was issued. The current Plan reflects feedback provided to OGE by these external stakeholders.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

www.oge.gov