

RESULTS FROM THE **ANNUAL** AGENCY ETHICS PROGRAM QUESTIONNAIRE

CY
2020



A
SNAPSHOT
OF THE EXECUTIVE
BRANCH ETHICS
PROGRAM

Contents

Section 1 – Introduction.....	2
Legal Requirement.....	2
Topics Covered.....	2
Changes to the Questionnaire	3
Methodology	3
Response Rate	3
Data Limitations.....	4
Section 2 – Key Highlights.....	5
Effects of the COVID-19 Pandemic	5
Ethics Officials & Resourcing.....	5
Financial Disclosure	6
Education & Training	8
Advice & Counsel.....	9
Ethics Pledge	10
Enforcement.....	11
Section 3 – Compilation of Agency Responses	12
Part 4. Program Resources and Administration.....	12
Part 5. Education and Training.....	17
Part 6. Advice, Counseling, and Remedies	21
Part 7. Financial Disclosure Program management and Electronic Filing Systems	23
Part 8. Public Financial Disclosure.....	25
Part 9. Confidential Financial Disclosure.....	29
Part 10. Enforcement of Standards of Conduct and Criminal and Civil Statutes	31
Part 11. Ethics Pledge Assessment.....	33
Part 12. Special Government Employees (SGEs).....	36
Appendix	39

Section 1 – Introduction

The United States Office of Government Ethics (OGE) leads and oversees the executive branch ethics program designed to prevent financial conflicts of interest.

Every year, each agency¹ within the executive branch is required to submit to OGE a response to the Annual Agency Ethics Program Questionnaire. Each questionnaire response provides a snapshot of that agency’s ethics program. In the aggregate, the responses also provide a picture of the executive branch ethics program as a whole.

OGE uses the questionnaire to conduct oversight of each agency’s ethics program and uses the resulting data to report on the executive branch ethics program to stakeholders, including the public, Congress, and the ethics community. OGE also uses the data to make informed decisions about its priorities and allocation of resources.

This report combines and summarizes the 137 agency responses for calendar year 2020. Individual agency responses are available on OGE’s website on the [Agency Ethics Documents Search Collection](#).

Legal Requirement

Executive branch agencies are required to submit an annual report to OGE pursuant to the Ethics in Government Act of 1978, as amended.² OGE collects the required report through the questionnaire.³

Topics Covered

OGE uses the questionnaire to collect information about the following aspects of each agency’s ethics program:

- Ethics Program Resources and Administration
- Ethics Education and Training
- Advice, Counseling, and Remedies
- Financial Disclosure Program Management and Electronic Filing Systems
- Public and Confidential Financial Disclosure
- Enforcement
- Ethics Pledge (contained in Executive Order 13770)

¹ For purposes of the questionnaire, the term “agency” refers to every entity that has a Designated Agency Ethics Official (DAEO). Each agency within the executive branch must have a DAEO. *See* 5 C.F.R. 2638.104(a). In addition, some entities, such as the Department of Defense (DoD) and the White House, appoint a DAEO to run the ethics program at the individual office or component level. Thus, several offices within the White House and many components within DoD each have separate DAEOs which manage the ethics program for their respective office or component. OGE treats each of these White House offices and DoD components as distinct ethics programs and requires a separate response to the questionnaire from each.

² *See* 5 U.S.C. app. § 402(e)(1).

³ *See* 5 C.F.R. 2638.207.

- Special Government Employees

Changes to the Questionnaire

OGE made three substantive changes to the 2020 questionnaire:

1. Agencies that lacked required written procedures were required to explain what steps they took to establish the written procedures.
2. Agencies were no longer asked to report the number of public financial disclosure reports of Presidentially appointed, Senate-confirmed nominee positions. OGE can produce this data from already existing records.
3. Agencies were asked whether they established education requirements beyond the standard training requirements identified in the regulation.

OGE also made a variety of non-substantive changes. These changes improved clarity, eliminated ambiguities, and removed outdated response options. Of note, OGE streamlined the questions regarding signatories of the Ethics Pledge (Executive Order 13770), but made no change to the substantive information requested.

OGE gave advance notice of these changes through its [Program Advisory 20-07](#), which includes a red-line version of the edits.

Methodology

The questionnaire covered agency ethics program activities that occurred in calendar year 2020. OGE provided an advance copy of the questionnaire to every Designated Agency Ethics Official on September 9, 2020. OGE opened the survey on January 4, 2021, and agency responses were due on February 1, 2021.⁴

OGE allowed only one response per agency; accordingly, each agency's response reflects the data for the entire agency, including agency components.

OGE used a custom application to collect each agency response. OGE followed up with individual agencies based on a pre-determined set of selection criteria, including large changes from the previous year's response, internal inconsistencies of responses, and narrative responses that were unclear or incomplete.

Response Rate

137 of the 140 agencies responded to the questionnaire. The following three agencies did not provide responses: the White House office (WHO), the National Security Council (NSC), and the Council of Economic Advisers (CEA). Under normal circumstances, OGE would require submission from these agencies. However, at the time the questionnaire was due – February 1, 2021 – the new presidential administration had taken over the ethics programs for the WHO, NSC, and CEA. The questionnaire covered the last year of the previous

⁴ See 5 C.F.R. § 2638.207(a).

administration, and none of these agencies retained career ethics staff from the previous administration to respond to the questionnaire. Accordingly, OGE was unable to collect a questionnaire response from these entities.

Data Limitations

When reviewing this report, it is important to keep in mind the following data limitations:

- OGE does not independently verify the information submitted by each agency. However, based on a set of criteria, OGE reviews agency responses for anomalies and, when necessary, requests clarifications from the agencies.
- Agency ethics officials may interpret the questions differently.
- The aggregate number for certain questions may actually be higher than reported, because when the requested information is classified agencies responded with a zero.⁵
- Confidential financial disclosure numbers are incomplete due to disruptions caused by the COVID-19 pandemic. The Department of Commerce was unable to provide data on the timeliness of review and certification ([Q42](#)) and both the Department of Justice and the U.S. Agency for Global Media provided estimates ([Q41](#) and [Q42](#)).
- The data regarding the Ethics Pledge (contained in Executive Order 13770) is incomplete. The ethics offices of the U.S. Agency for Global Media explained that they were not provided with information about non-career staff hired by the CEO.

⁵ Questions 2, 17, 18, 21, 34-38, 41-43, 54-59.

Section 2 – Key Highlights

This section highlights key data points from the aggregated responses of the 137 agencies that responded for calendar year 2020. Percentages represent the aggregate response. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in a 100% for an individual response or 101% when adding separate percentages. When calculating percentages, responses of “not applicable” were not included in the denominator.

Effects of the COVID-19 Pandemic

Calendar year 2020 was an unprecedented year for the federal government due to the global COVID-19 pandemic (pandemic). On March 13, 2020, the President declared a national emergency. Most federal physical offices closed down and, where possible, employees switched to telework. Despite the many disruptions caused by the pandemic, agencies quickly adapted their ethics programs and continued to achieve high rates of compliance, as demonstrated by the numbers below. Where applicable, the following sections include observations of how the pandemic affected agency programs.

Ethics Officials & Resourcing

The Designated Agency Ethics Official (DAEO) is the employee with primary responsibility for directing the daily activities of an agency’s ethics program and coordinating with OGE. The questionnaire responses show that in 2020 **most DAEOs (87%) were career employees**. Fifty-six percent (56%) of DAEOs had spent less than 5 years in their current positions, although 72% had 5 years or more of ethics experience, overall. **Seventy-nine percent (79%) of DAEOs spent less than 25% of their time on ethics.** ([See Q3](#))

Across the country, more than 7,800 employees supported the ethics program either through substantive work, such as reviewing financial disclosures, or administrative support, such as providing human resources or information technology services. Of these employees, **11%, or 867 individuals, performed ethics duties close to full time (31 to 40 hours a week).**⁶ The remaining 89% of employees supporting the ethics program worked on ethics anywhere from one (1) hour per week to 30 hours per week, as one component of other responsibilities. Therefore, when accounting for the reported number of hours worked per week by each individual, **there were 2,358 full-time equivalent positions that supported the ethics program across the executive branch.** ([See Q5](#))

Of the 137 reporting agencies, **57 (42%) reported needing more resources.** Agencies most frequently indicated needing additional resources in the area of human capital (48 agencies), followed by technology (43 agencies). ([See Q9](#))

⁶ Each agency is required to have a minimum of two ethics officials, the Designated Agency Ethics Official (DAEO) and the Alternate (ADAEO). *See* 5 C.F.R. 2638.104(a) and (d). Larger agencies may dedicate additional staff to ethics.

Effects of the COVID-19 Pandemic

Although few agencies commented about the effect of the pandemic on program resources, a handful of agencies reported that the pandemic affected staffing, for instance slowing the ability to backfill vacant positions and interrupting plans to bring on detailees.

Financial Disclosure

Disclosure of personal financial interests – such as assets, liabilities, and outside positions – allows ethics officials to help employees assess when personal interests might conflict with government responsibilities. The timely collection, review, and certification of public and confidential financial disclosures helps to ensure that the government’s business is conducted free from conflicts of interest.

Notification of Filing Status

OGE regulations require coordination between agencies’ human resources (HR) and ethics officials.⁷ Specifically, HR officials must notify ethics officials within specified time frames regarding the status of employees as financial disclosure filers. Prompt notification is necessary for timely disclosure and screening for potential conflicts of interest. Most agencies met the time frames ([See Q28](#) and [Q29](#)):

- **95% of agencies** reported that in all or most cases the human resources office(s) **notified the DAE0 of appointments to public financial disclosure positions** within the 15-day deadline (99 of 104 agencies to which the requirement applied).
- **91% of agencies** reported that in all or most cases the human resources office(s) **notified the DAE0 of appointments to confidential financial disclosure positions** within the 15-day deadline (95 of 105 agencies to which the requirement applied).
- **92% of agencies** reported that in all or most cases the human resources office(s) **notified the DAE0 of terminations from public financial disclosure positions** within the 15-day deadline (96 of 104 agencies to which the requirement applied).⁸

Filing Compliance

The 2020 questionnaire results demonstrate a high rate of employee compliance with the filing requirements⁹:

- **More than 99% of those required to file public financial disclosures did so:** 26,889 reports filed out of 26,974 required ([See Q35](#) and [Q56](#)).

⁷ See 5 C.F.R. 2638.105.

⁸ Confidential financial disclosure filers do not file a termination report. See 5 C.F.R. 2634.903(e).

⁹ For filing requirements, see 5 C.F.R. 2634.201 and 2634.903.

- **99% of those required to file confidential financial disclosures did so:** 392,605 reports filed out of 396,867 required ([See Q41](#) and [Q56](#)).

In addition to new entrant, annual, and termination reports, public filers must also report transactions of certain securities as they occur so that ethics officials can evaluate potential conflicts of interest in close to real time.¹⁰ In 2020, public filers submitted a reported **22,043 periodic transaction reports.** ([See Q37](#))

Timeliness of Review and Certification

Agencies should review reports promptly and must perform a technical review and conflict of interest analysis within 60 days of receiving a report.

- In 2020, agencies reported that they conducted **timely reviews for 92% of the reports certified** ([See Q36](#), [Q42](#), and [Q57](#))

If no additional information or remedy is required, agencies must also certify the report before the 60-day period expires. However, final certification may necessarily occur later, if the agency needs to seek additional information or to take remedial action.

- In 2020, agencies reported that they **certified reports 88% of reports within 60 days** ([See Q36](#), [Q42](#), and [Q57](#))

Public Availability

Transparency plays an essential role in strengthening trust in government. Agencies must make the financial interests of certain high-level officials publicly available.¹¹ Without this transparency, the public could not as meaningfully oversee the integrity of its government.

In 2020, agencies reported a total of **584 requests for public financial disclosure reports.** ([See Q40](#)) This number decreased significantly from 2019, likely due to the absence of White House Office data (see the discussion on “Response Rate” in Section I, above).¹²

In addition, in 2020, OGE processed requests from the public and the news media to inspect nearly 7,000 documents under the Ethics in Government Act, including public financial disclosure reports, periodic transaction reports, certificates of divestiture, Ethics Pledge waivers, and other covered records.¹³

Technology

¹⁰ See 5 C.F.R. 2634.201(f) and 2634.309.

¹¹ See 5 C.F.R. 2634.603.

¹² In 2019, the White House Office reported 1,642 requests, while all other agencies reported less than 30.

¹³ See OGE’s Annual Performance Report for FY 2020

([https://www.oge.gov/web/OGE.nsf/0/741023D866C9F0D08525865C006A0040/\\$FILE/OGE%20FY%202020%20Annual%20Performance%20Report%20\(Final\).pdf](https://www.oge.gov/web/OGE.nsf/0/741023D866C9F0D08525865C006A0040/$FILE/OGE%20FY%202020%20Annual%20Performance%20Report%20(Final).pdf)).

Agencies continue to use technology to support their financial disclosure programs. As required by regulation, **all 137 agencies responding used *Integrity*, OGE’s executive branch-wide electronic filing system**, for at least some of their public disclosure reports. In addition, 67 agencies reported using other electronic filing systems for other public reports and/or confidential reports. ([See Q30-Q31](#))

Effects of the COVID-19 Pandemic

Some agencies directly involved with responding to the pandemic noted that the prioritization of pandemic-related work created delays in administering their financial disclosure programs. In addition, many agencies reported that they encountered logistical difficulties during the adjustment to full-time telework. Delays in getting laptops to employees and ensuring the requisite access to agency systems impacted the financial disclosure program at various points: identifying new filers, notifying employees of filing requirements, and accessing electronic filing systems to file, review, and certify reports.

In addition, the switch to telework created particular challenges for the agencies that still use paper forms for their confidential financial disclosure system. Challenges ranged from employees not having printers or scanners at home to delays caused by sending forms via physical mail. In addition, many reports were filed right before the move to telework; those forms remained in the office, inaccessible to ethics officials, delaying review and certification in some cases. Lack of access to these forms also resulted in some agencies providing incomplete data or data estimates in response to the 2020 questionnaire.

Education & Training

An agency’s ethics education program increases employees’ awareness of their ethical obligations, helps them identify ethics issues that may arise in the work they perform, and provides employees with guidance and support for making ethical decisions.

Overall, the results from the questionnaire demonstrate a high rate of employee compliance with the core training requirements ([See Q17, Q18, Q21, and Q55](#))¹⁴:

- **97%** of new Presidentially Appointed Senate-Confirmed appointees **timely received their required initial ethics briefing** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).
- **93%** of **new employees timely received their required initial ethics training** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).
- **98%** of public and confidential financial disclosure **filers received their required annual ethics training** (excluding Special Government Employees expected to serve less than 60 days on a board, commission, or committee).

¹⁴ For training requirements, see 5 C.F.R. 2638 Subpart C.

- **94% of Special Government Employees** who were expected to serve on a board, commission, or committee **received their required initial ethics training** before or at their first meeting.

In addition, 30% of agencies established additional ethics education requirements, beyond the minimum required by regulation. ([See Q22](#))

With respect to assessing risk and effectiveness, **81%** of agencies **reported assessing risk** to determine the content, format, and/or timing of their ethics education and **78%** of agencies **reported assessing the effectiveness of their education programs**. (See [Q23](#) and [Q24](#))

Effects of the COVID-19 Pandemic

For the agencies that did not previously utilize a virtual platform for training, the switch to telework forced them to use virtual solutions. The switch to virtual created some logistical delays: employees needed to receive laptops and agencies needed time to create and test training. The switch to mandatory telework and all-virtual processes also impacted coordination with HR. As a result, some ethics office reported issues with notification and tracking of employees required to receive ethics training. Despite these challenges, as evidenced by the numbers above, agencies were able to provide training for most employees.

Advice & Counsel

The analysis and resolution of conflicts of interests are key to agencies and employees managing and minimizing the risk of ethical failure. A thorough analysis is the first step in ensuring that agencies and employees take appropriate steps to remedy a potential conflict of interest. By resolving potential conflicts before they happen, ethics officials help ensure that their agencies' decisions are made in the public's interest and are not unfairly influenced by personal financial interests. **Employees most frequently sought ethics guidance on: (1) financial disclosure reporting, (2) outside employment/activities, and (3) gift acceptance.** ([See Q25](#))

All employees must recuse from government matters that affect the financial interest of someone with whom they are seeking employment.¹⁵ Certain senior employees are also required to notify their ethics official in writing when they begin negotiating for employment with a non-government entity to help ensure that they receive timely advice.¹⁶ In 2020, these **senior officials filed 2,050 notifications regarding negotiations for employment.** ([See Q26](#))

¹⁵ See 18 U.S.C. § 208 and 5 C.F.R. 2635.604.

¹⁶ See Representative Louise McIntosh Slaughter Stop Trading on Congressional Knowledge Act, Pub. L. No. 112-105 § 17 and 5 C.F.R. 2635.607.

The criminal conflict of interest law at 18 U.S.C. § 208 prohibits an employee from participating in an official capacity in a particular matter in which the employee has a financial interest. The law is intended to be prophylactic, and its scope is quite broad. In order to mitigate the impact of section 208, Congress included two provisions that permit an agency to issue a waiver of the prohibition in individual cases. In 2020, **agencies issued 71 such waivers to regular employees and 338 such waivers to Special Government Employees serving on federal advisory (FACA) committees.** ([See Q27](#))

Ethics Pledge

Executive Order 13770 required certain individuals appointed to an executive branch agency on or after January 20, 2017, to sign an Ethics Pledge (“Pledge”).¹⁷ By signing the Pledge, these appointees committed to additional recusal obligations, post-employment restrictions, and a ban on accepting gifts from lobbyists or lobbying organizations.

Agencies reported **811 appointees in 2020**.¹⁸ Of those, **730 signed the Pledge**, which includes one (1) appointee who should have signed the Ethics Pledge in 2020 but signed in 2021. Seven (7) appointees who were required to sign the Pledge did not do so, for the following reasons ([See Q49](#)):

- The Federal Housing Finance Agency reported that they had erroneously understood that one (1) appointee had signed the Pledge at the appointee’s previous agency. When the agency discovered the mistake, Executive Order 13770 had already been rescinded.
- The Department of Energy reported that one (1) appointee incorrectly signed the Pledge from the Obama Administration (Executive Order 13490).
- The Department of Energy reported that, in the case of two (2) appointees, they were unable to confirm whether or not the appointees signed the Pledge because of limitations on accessing offices during the Covid-19 pandemic.
- The U.S. Agency for International Development reported that, in the case of three (3) appointees, it had no records of whether the appointees signed or not.

The **remaining 74 appointees were not required to sign**, for the following reasons ([See Q49](#)):

- 13 were appointed to an exempt, non-policymaking position;
- 60 were appointed without a break in service after serving in another position for which the Pledge had already been signed; and

¹⁷ Because the questionnaire covered calendar year 2020, agencies were asked to report on compliance with the Trump Ethics Pledge, contained in Executive Order 13770. On January 19, 2021, Executive Order 13770 was revoked by Executive Order 13983.

¹⁸ The following advisories, located on [OGE’s website](#), provide detailed guidance regarding the appointees subject to the Ethics Pledge: LA-17-03, DO-09-003, DO-09-005, DO-09-010, and DO-09-020.

- One (1) appointee who signed the Pledge was subsequently appointed to serve, concurrently, in another appointee position.

Additionally, Pledge data for the U.S. Agency for Global Media is unavailable; the agency's ethics office noted that they were not provided with information about non-career staff hired by the CEO. The ethics office explained that, for this reason, the ethics office was not able to administer the Pledge requirement, they did not have information about who did or did not sign the Pledge, and they did not have any way to obtain such information or complete the relevant section of the survey.

Appointees who were registered lobbyists during the two years prior to their appointment are required to recuse from certain activities related to their prior lobbying activities. Of the full-time non-career appointees in 2020, agencies reported that six (6) appointees **(1%) were registered lobbyists during the two years prior** to their appointment. ([See Q50](#))

The Executive Order provides a mechanism for the President or his designee to waive any of the restrictions contained in the Pledge. In 2020, **the White House granted waivers to 3 individuals from 3 different agencies.**¹⁹ In all three cases, the White House waived paragraph 6 of the Pledge, which requires appointees to recuse for two years from certain matters related to former employers or clients. ([See Q51](#))

Agencies reported zero **violations of the Pledge** ([See Q52-53](#))

Enforcement

Each agency is responsible for investigating and taking action against an employee who potentially has violated an ethics rule or law.²⁰ Agencies may take corrective or disciplinary action under applicable Government-wide regulations or agency procedures. If misconduct is potentially criminal, the agency must refer the matter to the Department of Justice.

Thirty-four (34) agencies reported taking **752 disciplinary actions based wholly or in part upon violations of the Standards of Conduct** (multiple actions could be taken for one individual). **Just over half (55%) of the disciplinary actions involved misuse of position.** ([See Q44](#))²¹

Twelve (12) agencies reported taking **17 disciplinary actions based wholly or in part upon violations of criminal or civil statutes** (multiple actions could be taken for one individual). **Just over half (53%) of those actions were for violations of 18 U.S.C. § 208,**

¹⁹ As noted above, in Section 1, the White House Office, National Security Council, and Council of Economic Advisers did not submit a response to the questionnaire. Accordingly, this summary does not include any waivers issued by the White House to employees of these entities.

²⁰ See 5 C.F.R. 2638.107(d).

²¹ Although the questionnaire does not provide an option for agencies to indicate that they do not know or do not track this information, agency comments from past questionnaires indicate that this is sometimes the case.

a criminal statute that prohibits taking official action that can affect a personal interest. ([See Q45](#))²²

Twenty-two (22) agencies reported a total of **44 referrals to the Department of Justice** concerning potential violations of the criminal conflict of interest statutes. ([See Q46](#))

Section 3 – Compilation of Agency Responses

For each question, the **bold red** number is the aggregated response for all 137 agencies that responded to the questionnaire. In parentheses is the percentage that the aggregated response represents. Percentages are not calculated for questions that allowed agencies to select more than one response. Percentages are rounded to the nearest whole number, except when the rounding would have resulted in a 100% for an individual response or 101% when adding separate percentages. When calculating percentages, responses of “not applicable” were not included in the denominator.

PART 4. PROGRAM RESOURCES AND ADMINISTRATION

1. Agency: **137 (98%)**
2. Number of full-time agency employees as of December 31, 2020: **3,622,654**
3. Information about the Designated Agency Ethics Official (DAEO):

a. Vacant (as of December 31, 2020)?	<input type="checkbox"/> Yes (<i>skip to #4a</i>) 6 (4%) <input type="checkbox"/> No 131 (96%)
b. Time in current DAEO position	<input type="checkbox"/> Less than 1 year 18 (14%) <input type="checkbox"/> 1-4 years 55 (42%) <input type="checkbox"/> 5-9 years 32 (24%) <input type="checkbox"/> 10 or more years 26 (20%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 8 (6%) <input type="checkbox"/> 1-4 years 28 (21%) <input type="checkbox"/> 5-9 years 29 (22%) <input type="checkbox"/> 10 or more years 66 (50%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 103 (79%) <input type="checkbox"/> 26-50% 14 (11%) <input type="checkbox"/> 51-75% 3 (2%) <input type="checkbox"/> 76-100% 11 (8%)

²² Although the questionnaire does not provide an option for agencies to indicate that they do not know or do not track this information, agency comments from past questionnaires indicate this is sometimes the case.

e. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 114 (87%) <input type="checkbox"/> political appointee 17 (13%)
f. Number of reporting levels between the DAEO and the agency head.	<input type="checkbox"/> 0 (the agency head is the DAEO) 2 (2%) <input type="checkbox"/> 1 101 (77%) <input type="checkbox"/> 2 24 (18%) <input type="checkbox"/> 3 4 (3%) <input type="checkbox"/> 4 or more 0

4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

a. Vacant (as of December 31, 2020)?	<input type="checkbox"/> Yes (<i>skip to #5</i>) 11 (8%) <input type="checkbox"/> No 126 (92%)
b. Time in current ADAEO position	<input type="checkbox"/> Less than 1 year 17 (13%) <input type="checkbox"/> 1-4 years 71 (56%) <input type="checkbox"/> 5-9 years 20 (16%) <input type="checkbox"/> 10 or more years 18 (14%)
c. Total years performing ethics duties	<input type="checkbox"/> Less than 1 year 8 (6%) <input type="checkbox"/> 1-4 years 31 (25%) <input type="checkbox"/> 5-9 years 27 (21%) <input type="checkbox"/> 10 or more years 60 (48%)
d. Percent of time spent on ethics	<input type="checkbox"/> 0-25% 65 (52%) <input type="checkbox"/> 26-50% 21 (17%) <input type="checkbox"/> 51-75% 8 (6%) <input type="checkbox"/> 76-100% 32 (25%)
e. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee 124 (98%) <input type="checkbox"/> political appointee 2 (2%)

5. Number of employees, including the DAEO and ADAEO, who performed ethics program duties in 2020 (e.g., financial disclosure, education and training, advice and counseling, and program administration).

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area	744	744	218	98	630	2,434 (31%)
	1,777	2,636	586	143	237	5,379 (69%)

b. Outside the D.C. Metro area						
TOTAL	2,521 (32%)	3,380(43%)	804(10%)	241(3%)	867(11%)	7,813

*FTE = Full Time Equivalent

6. In what areas did contractors support the ethics program? Select all that apply.

- Not applicable (no contractors supported the ethics program) **85**
- IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.) **45**
Please describe the IT support (optional):
- Administrative support (e.g., tracking filing or training requirements, sending reminders, data entry, etc.) **18**
Please describe the administrative support (optional)
- Substantive ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.) **5**
Please describe the substantive support (optional)
- Other (please describe) **3** [See Question 6](#)

7. Did your agency **receive** ethics services or support from another federal agency or federal entity? Do not include contractors, OGE support, or OMB support of MAX.gov.

- Yes **25 (18%)**
Please provide the name(s) of the federal agency or entity: [See Question 7a](#)
Describe the services or support received: [See Question 7b](#)
- No **112 (82%)**

8. Did your agency **provide** ethics program services or support for any board, commission, or agency that is independent of your agency?

- Yes **18 (13%)**
Please provide the name(s) of the board, commission, or agency: [See Question 8a](#)
Describe the services or support provided: [See Question 8b](#)
- No **119 (87%)**

9. Does your agency's ethics program need additional resources? Check all that apply.

- No additional resources needed **80**
- Human Capital **48**

- Technology **43**
- Other (specify) **10** [See Question 9](#)
10. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2020?
- Yes **94 (70%)**
- No **40 (30%)**
- Not applicable (specify why) **3**²³ [See Question 10](#)
11. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) evaluate any aspect of the ethics program in 2020 (5 C.F.R. 2638.104(c)(16))?
- Yes **85 (62%)**
- No (*skip to #14*) **52 (38%)**
12. To whom were the results reported? Select all that apply.
- Agency Head **42**
- DAEO **64**
- General Counsel **46**
- Inspector General **10**
- Other (specify) **25** [See Question 12](#)
13. What kind of changes resulted from the assessment?
- Programmatic changes (please describe) **65**
- Policy changes (please describe) **31**
- No changes resulted (specify why not) **12**
- Not applicable (specify why) **1**
- [See Question 13](#)
14. Of the following required written procedures, which did you have in place? Check all that apply:
- Financial disclosure program, including for the filing, review, and when applicable, public availability of public financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i)) **135**
- Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. 2638.303) **124**
- Provision of initial ethics training (5 C.F.R. 2638.304) **132**
- Issuance of ethics notice to new supervisors (5 C.F.R. 2638.306) **116**
- None. Explain what steps you are taking to implement the required written procedures: **0**

²³ The percentage calculations for this question exclude agencies that answered “not applicable.”

ADDITIONAL COMMENTS FOR PART 4. [See Part 4 Comments](#)

PART 5. EDUCATION AND TRAINING

15. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. 2638.303, provide the DAEO with the written confirmation required pursuant to 5 C.F.R. 2638.310?

- Written confirmation not required because my agency has less than 1,000 employees **77²⁴**
 - Written confirmation not required because the DAEO’s office is responsible for issuing ethics notices to prospective employees **4**
 - All of the offices provided written confirmation to the DAEO (*skip to #17*) **51 (91%)**
 - Some of the offices provided written confirmation to the DAEO (*explain why not all offices, then skip to #17*) **1 (2%)**
 - None of the offices provided written confirmation to the DAEO (*explain why not all offices, then skip to #17*) **4 (7%)**
- [See Question 15](#)

16. Did written offers of employment for positions covered by the Standards of Conduct include the information required by 5 C.F.R. 2638.303?

- All of the written offers included the required information **59 (86%)**
 - Some of the written offers included the required information (please explain why not all offers) **5 (7%)**
 - None of the written offers included the required information (please explain why not all offers) **5 (7%)**
 - Not applicable because no offers of employment were made **10²⁵**
 - Not applicable for another reason (please explain) **2**
- [See Question 16](#)

17. How many new agency leaders, as defined in 5 C.F.R. 2638.305(a), were required to receive ethics briefings by December 31, 2020? **Exclude** SGES that were expected to serve less than 60 days on a board, commission, or committee. **109**

a. How many new agency leaders received their briefing within 15 days of their appointment?	106 (97%)
b. How many new agency leaders received their briefing beyond the 15-day requirement?	3 (3%)
c. How many new agency leaders have yet to receive their briefing as of today?	0

If applicable, please explain why some of the leaders received their briefing beyond the 15-day requirement or have yet to receive their briefing. [See Question 17](#)

²⁴ The percentage calculations for this question exclude agencies that answered “written confirmation not required...”

²⁵ The percentage calculations for this question exclude agencies that answered “not applicable.”

18. How many employees, **including SGEs**, were required to receive Initial Ethics Training (IET) by December 31, 2020 (5 C.F.R. 2638.304)? Include employees who were excluded, under 5 C.F.R. 2638.304(a)(2), from the requirement to receive the interactive portion of the IET. **431,613**

a. How many of those employees received IET within the 3-month requirement?	403,365 (93%)
b. How many of those employees received IET beyond the 3-month requirement?	14,175 (3%)
c. How many of those employee have not received IET as of today?	14,073 (3%)

If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET. [See Question 18](#)

19. Did the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required written confirmation to the DAEO, pursuant to 5 C.F.R. 2638.310?

- Written confirmation not required because my agency has less than 1,000 employees **68**²⁶
- Written confirmation not required because all IET was provided by an office under the DAEO's supervision **41**
- All of the offices provided the written confirmation to the DAEO **26 (93%)**
- Some of the offices provided the written confirmation to the DAEO (explain why not all offices) **0**
- None of the offices provided the written confirmation to the DAEO (explain why not all offices) **2 (7%)**

[See Question 19](#)

20. Did the head of the agency complete either initial ethics training and/or annual ethics training in 2020?

- Yes **134 (99%)**
- No (specify why) **1 (1%)**
- Not applicable (specify why) **2**²⁷ [See Question 20](#)

²⁶ The percentage calculations for this question exclude agencies that answered "Written confirmation not required..."

²⁷ The percentage calculations for this question exclude agencies that answered "not applicable."

21. Required Annual Ethics Training

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)
a. Executive Schedule Level I or Level II public filers (OGE Form 278e)	49	47 (96%)
b. All other public filers (OGE Form 278e)	22,426	21,794 (97%)
c. Confidential filers (OGE Form 450 and OGE-approved alternative confidential financial disclosure forms)	343,652	338,138 (98%)
d. Other employees required by 5 C.F.R. 2638.307(a) (employees appointed by the President; employees of the Executive Office of the President; contracting officers; or, other employees designated by the head of the agency.)	31,270	30,620 (98%)
TOTAL	397,397	390,599 (98%)

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: [See Question 21](#)

22. Did your DAEO establish additional requirements for the agency's ethics education program, beyond those described in 5 CFR 2638.303-308? For example, did your DAEO establish specific government ethics training requirements for groups of agency employees?

- Yes **41 (30%)** (please describe): [See Question 22](#)
- No **96 (70%)**

23. If your agency assessed risk to help inform the content, format, and/or timing of ethics education and communications, select all that apply (see [PA-19-05](#) for reference):

- Reviewed advice logs for common issues **70**
- Discussed upcoming work and agency priorities with senior staff **72**
- Talked to program managers about risks inherent in their work **60**
- Conducted surveys to identify common and emerging ethics risks **16**
- Talked to employees about the ethics concerns they encounter in the workplace. **81**
- Other (please specify) **22** [See Question 23](#)
- My agency did not assess risk **26**

24. If your agency evaluated the effectiveness of your ethics education and/or communication, select all that apply (see [PA-19-05](#) for reference):

- Conducted self-assessments to ensure that required employees are receiving Training **75**
- Administered post-training evaluations to assess participants' perceptions of the Training **40**
- Reviewed advice logs for increased activity after training presentations and Communications **48**
- Held discussions with agency leaders and employees to evaluate whether the training and communications they received supported them in managing ethics risks **55**
- Other (please describe) **27** [See Question 24](#)
- My agency did not evaluate the effectiveness of ethics education **30**

ADDITIONAL COMMENTS FOR PART 5. [See Part 5 Comments](#)

PART 6. ADVICE, COUNSELING, AND REMEDIES

25. From the list below, select the three topics that your employees most frequently sought guidance on in 2020. Please rate them in order, so that the first topic is the topic on which employees sought guidance the most frequently.

Conflicting financial interests Most frequent topic: 21 agencies Second most frequent topic: 9 agencies Third most frequent topic: 13 agencies This topic was selected a total of 43 times
Gift acceptance Most frequent topic: 24 agencies Second most frequent topic: 21 agencies Third most frequent topic: 20 agencies This topic was selected a total of 65 times
Financial disclosure reporting Most frequent topic: 41 agencies Second most frequent topic: 38 agencies Third most frequent topic: 17 agencies This topic was selected a total of 96 times
Impartiality in performance of official duties Most frequent topic: 7 agencies Second most frequent topic: 12 agencies Third most frequent topic: 7 agencies This topic was selected a total of 26 times
Misuse of position, government resources, and information Most frequent topic: 0 agencies Second most frequent topic: 8 agencies Third most frequent topic: 7 agencies This topic was selected a total of 15 times
Outside employment/activities Most frequent topic: 37 agencies Second most frequent topic: 24 agencies Third most frequent topic: 28 agencies This topic was selected a total of 89 times
Post-employment restrictions Most frequent topic: 3 agencies Second most frequent topic: 17 agencies Third most frequent topic: 34 agencies This topic was selected a total of 54 times
Travel, subsistence, and related expenses from non-federal sources Most frequent topic: 3 agencies Second most frequent topic: 6 agencies

<p>Third most frequent topic: 6 agencies This topic was selected a total of 15 times</p>
<p>Other (specify) Most frequent topic: 1 agencies Second most frequent topic: 2 agencies Third most frequent topic: 5 agencies This topic was selected a total of 8 times</p>

- 26. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2020 (see 5 C.F.R. 2635.602(a)): **2,050**
- 27. Number of 18 U.S.C. 208 waivers granted in 2020:

	Number Granted in 2020	Number Sent to OGE
a. 208(b)(1) waivers	71	64 ²⁸
b. 208(b)(3) waivers	338	316 ²⁹

If applicable, please explain discrepancies between the number of waivers granted and the number provided to OGE. [See Question 27](#)

ADDITIONAL COMMENTS FOR PART 6. [See Part 6 Comments](#)

²⁸ OGE subsequently received all waivers required to be submitted.
²⁹ The Department of Health and Human Services (HHS) provides 208(b)(3) waivers to OGE in batches. Accordingly, some of the waivers issued by HHS during calendar year 2020 were provided to OGE in calendar year 2021.

PART 7. FINANCIAL DISCLOSURE PROGRAM MANAGEMENT AND ELECTRONIC FILING SYSTEMS

28. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. 2638.105(a)(1))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	56 (54%)	43 (41%)	2 (2%)	3 (3%)	33³⁰
b. Confidential Filers	51 (48.6%)	44 (41.9%)	8 (7.6%)	2 (1.9%)	32

If not applicable, specify why. [See Question 28 NA](#)

If “never” or “in some cases,” please explain further: [See Question 28 Some or Never](#)

29. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. 2638.105(a)(2))?

	In All Cases	In Most Cases	In Some Cases (specify why, below)	Never (specify why, below)	Not Applicable (specify why, below)
a. Public Filers	57 (54.8%)	39 (37.5%)	3 (2.9%)	5 (4.8%)	33³¹

If not applicable, specify why. [See Question 29 NA](#)

If “never” or “in some cases,” please explain further: [See Question 29 Some or Never](#)

30. Did your agency use an electronic financial disclosure filing system in calendar year 2020? *Note:* For example, this includes *Integrity*, but would not include a mere digital signature of a PDF fillable form.

- Yes **137 (100%)**
- No (*skip to Additional Comments for this Part*) **0**

31. Which system did your agency use?

- Integrity* ONLY (*skip to Additional Comments for this Part*) **70 (51%)**
- Integrity* **and** Other (specify) **67 (50%)** [See Question 31](#)

³⁰ The percentage calculations for this question exclude agencies that answered “not applicable.”

³¹ The percentage calculations for this question exclude agencies that answered “not applicable.”

32. Indicate for which forms your agency used the “Other” e-filing system. Check all that apply.

- Public Financial Disclosure (OGE Form 278e) **26**
Provide the name of the other system:
- Periodic Transactions (OGE Form 278-T) **20**
Provide the name of the other system:
- Confidential Financial Disclosure (OGE Form 450 or OGE-approved alternative form) **65**
Provide the name of the other system: [See Question 32](#)

33. Indicate your FY 2020 actual costs for using the e-filing system. *Note:* Because OGE does not charge fees to use *Integrity*, there are no reportable costs associated with the use of *Integrity*.

	Public (do not include <i>Integrity</i>)	Confidential	Total
a. Amount paid to a non-federal vendor in FY 2020	\$231,633 (9 agencies did not know or did not track)	\$3,978,779 (12 agencies did not know or did not track)	\$4,210,412
b. Amount paid to a federal agency in FY 2020	\$151,000 (7 agencies did not know or did not track)	\$2,365,720 (11 agencies did not know or did not track)	\$2,516,720
c. Amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2020	\$289,635 (17 agencies did not know or did not ask)	\$3,132,875 (28 agencies did not know or did not track)	\$3,422,510
Total FY 2020 actual costs	\$672,268	\$9,477,374	\$10,149,642

34. Indicate the number of filers who filed electronically in fiscal year 2020.

	Public (<u>excluding</u> filers in <i>Integrity</i>)	Confidential
Number of financial disclosure filers, not reports, who filed electronically in FY 2020	6,235	310,335

ADDITIONAL COMMENTS FOR PART 7. [See Part 7 Comments](#)

PART 8. PUBLIC FINANCIAL DISCLOSURE

35. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2020, **excluding SGEs**, and the number of reports actually filed (i.e., received) by December 31, 2020.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	Required	0	151	1,335	451	1,379	3,316
	Filed	0	149 (99%)	1,326 (99%)	446 (99%)	1,370 (99%)	3,291 (99%)
b. Annual	Required	631	747	9,105	1,280	9,082	20,845
	Filed	631 (100%)	747 (100%)	9,101 (99.9%)	1,279 (99.9%)	9,067 (99.8%)	20,825 (99.9%)
c. Termination	Required	87	170	864	258	883	2,262
	Filed	85 (98%)	167 (98%)	853 (99%)	256 (99%)	866 (98%)	2,227 (98%)
d. Combination ¹	Required	7	19	180	34	161	401
	Filed	7 (100%)	19 (100%)	179 (99%)	34 (100%)	160 (99%)	399 (99.5%)
Total	Required	725	1,087	11,484	2,023	11,505	26,824
	Filed	723 (99.7%)	1,082 (99.5%)	11,459 (99.7%)	2,015 (99.6%)	11,463 (99.6%)	26,742 (99.6%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another category in the chart, etc.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. [See Question 35](#)

36. Note the number of public financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude reports of SGEs.** Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605 and section 4.02 of the Public Financial Disclosure Guide.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. New Entrant	How many reports did your agency certify or close in 2020?	0	163	1,269	460	1,354	3,246
	Of those certified or closed in 2020, how many were initially reviewed within 60 days?	0	147 (90%)	1,197 (94%)	443 (96%)	1,255 (93%)	3,042 (94%)
	Of those certified or closed in 2020, how many were certified or closed within 60 days?	0	116 (71%)	1,007 (79%)	379 (82%)	1,051 (78%)	2,553 (79%)
b. Annual	How many reports did your agency certify or close in 2020?	629	744	8,817	1,285	8,716	20,191
	Of those certified or closed in 2020, how many were initially reviewed within 60 days?	571 (91%)	697 (94%)	8,197 (93%)	1,240 (96%)	8,138 (93%)	18,843 (93%)
	Of those certified or closed in 2020, how many were certified or closed within 60 days?	499 (79%)	592 (80%)	7,063 (80%)	1,123 (87%)	6,546 (75%)	15,823 (78%)
c. Termination	How many reports did your agency certify or close in 2020?	74	138	839	228	841	2,120
	Of those certified or closed in 2020, how many were initially	72 (97%)	128 (93%)	799 (95%)	224 (98%)	818 (97%)	2,041 (96%)

	reviewed within 60 days?						
	Of those certified or closed in 2020, how many were certified or closed within 60 days?	69 (93%)	122 (88%)	741 (88%)	218 (96%)	764 (91%)	1,914 (90%)
d. Combination ¹	How many reports did your agency certify or close in 2020?	8	21	170	35	151	385
	Of those certified or closed in 2020, how many were initially reviewed within 60 days?	8 (100%)	18 (86%)	157 (92%)	35 (100%)	143 (95%)	361 (94%)
	Of those certified or closed in 2020, how many were certified or closed within 60 days?	7 (88%)	18 (86%)	151 (89%)	33 (94%)	136 (90%)	345 (90%)
TOTAL	How many reports did your agency certify or close in 2020?	711	1,066	11,095	2,008	11,062	25,942
	Of those certified or closed in 2020, how many were initially reviewed within 60 days?	651 (92%)	990 (93%)	10,350 (93%)	1,942 (97%)	10,354 (94%)	24,287 (94%)
	Of those certified or closed in 2020, how many were certified or closed within 60 days?	575 (81%)	848 (80%)	8,962 (81%)	1,753 (87%)	8,497 (77%)	20,635 (80%)

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

² Presidential appointees confirmed by the Senate.

³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

⁴ Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), administratively determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another section, etc.

If applicable, please explain why some reports were reviewed more than 60 days after submission. [See Question 36 Review](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **59**
- remedial action was being taken **13**
- other (specify) **28** [See Question 36 Certify](#)

37. Number of periodic transaction reports filed, **excluding those filed by SGEs**: **22,043**

Note: Count the total number of periodic transaction reports filed. *Example 1:* If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the table above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12” in the table.

38. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports and periodic transaction reports, **excluding those for reports filed by SGEs**.

	Granted Filing Extension	Granted Waiver of Late Filing Fee	Paid Late Filing Fee
a. Number of OGE Form 278e Reports	5,245	321	40
b. Number of OGE Form 278-T Reports	374	401	100

39. Number of public financial disclosure filers reported in calendar year 2020 to the Attorney General for failure to file: **1**

40. How many requests for public financial disclosure reports did you receive in 2020? Count each OGE Form 201 as one request, even if it contains a request for documents for multiple individuals. **584**

ADDITIONAL COMMENTS FOR PART 8. [See Part 8 Comments](#)

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

41. Report the number of confidential financial disclosure reports required to be filed by December 31, 2020, **excluding SGEs**, and the number of reports actually filed by December 31, 2020.

	a. Required	b. Filed	
		OGE Form 450	324,513
		OGE-approved alternative form	40,556
Total	368,654		365,069 (99%)

Note: If a 450 filer leaves the filing position before the due date, the report is not required per 5 C.F.R. 2634.903(a).

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. [See Question 41](#)

42. Note the number of confidential financial disclosure reports certified or otherwise closed by your agency during the calendar year. **Exclude reports of SGEs**. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. “Initially reviewed within 60 days” means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605 and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	How many reports did your agency certify or close in 2020?	Of those certified or closed in 2020, how many were initially reviewed within 60 days?	Of those certified or closed in 2020, how many were certified or closed within 60 days?
a. OGE Form 450 and OGE-approved alternative	348,351	318,564 (91%)	306,890 (88%)

If applicable, please explain why some reports were reviewed more than 60 days after submission. [See Question 42 Review](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **56**
- remedial action was being taken **22**
- other (specify) **35** [See Question 42 certify](#)

43. Number of OGE 450 or OGE-approved alternative forms granted filing extensions in 2020. **9,485**

ADDITIONAL COMMENTS PART 9. [See Part 9 Comments](#)

PART 10. ENFORCEMENT OF STANDARDS OF CONDUCT AND CRIMINAL AND CIVIL STATUTES

44. Number of disciplinary actions taken in 2020 based wholly or in part upon violations of the Standards of Conduct provisions (5 C.F.R. part 2635) or your agency's supplemental Standards (if applicable). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: **752**

Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

- Subpart A (General Provisions) **278**
- Subpart B (Gifts from Outside Sources) **12**
- Subpart C (Gifts Between Employees) **3**
- Subpart D (Conflicting Financial Interests) **9**
- Subpart E (Impartiality in Performing Official Duties) **12**
- Subpart F (Seeking Other Employment) **2**
- Subpart G (Misuse of Position) **414**
- Subpart H (Outside Activities) **27**
- Agency's supplemental Standards of Conduct **13**

45. Number of disciplinary actions taken in 2020 based wholly or in part upon violations of the criminal conflict of interest statutes (18 U.S.C. sections 203, 205, 208, and 209), failure to file or filing false public financial disclosures (5 U.S.C. app. section 104 or 18 U.S.C. section 1001), civil matters involving outside earned income (5 U.S.C. app. section 501), or outside activities (5 U.S.C. app. section 502). For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: **17**

Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

- 18 U.S.C. section 203 (Compensation in Matters Affecting the Government) **1**
- 18 U.S.C. section 205 (Claims Against and Matters Affecting the Government) **0**
- 18 U.S.C. section 208 (Acts Affecting a Personal Financial Interest) **9**
- 18 U.S.C. section 209 (Supplementation of Salary) **0**
- 5 U.S.C. app. section 104 or 18 U.S.C. section 1001 (Failure to file or filing false public financial disclosures) **6**
- 5 U.S.C. app. section 501 (outside earned income) **0**
- 5 U.S.C. app. section 502 (outside activities) **1**

46. Number of referrals made in 2020 to the Department of Justice of potential violations of the conflict of interest statutes (18 U.S.C. sections 203, 205, 207, 208, 209), failure to file or filing false public financial disclosures (5 U.S.C. app. section 104 or 18 U.S.C. section 1001), civil matters involving outside earned income (5 U.S.C. app. section 501) or outside activities (5 U.S.C. app. section 502): **44**

DOJ Referral Status

- a. How many of those referrals were accepted for prosecution? **4**
- b. How many of those referrals were declined for prosecution? **34**
- c. How many of those referrals were pending DOJ's decision as of December 31, 2020? **6**

Agency Disciplinary Action Status

- a. Of the cases referred to DOJ, how many resulted in disciplinary or corrective action? **7**
 - b. Of the cases referred to DOJ, how many resulted in a determination not to take disciplinary or corrective action? **10**
 - c. Of the cases referred to DOJ, how many are pending a determination as to whether disciplinary or corrective action will be taken? **14**
 - d. Of the cases referred to DOJ, how many involved employees who left the agency before the agency determined whether or not to take disciplinary action? **10**
 - e. Of the cases referred to DOJ, how many involved 18 U.S.C. 207, such that there was no option for disciplinary action? **4**
47. Did your agency notify OGE of all referral(s) and disposition(s) of the referral(s) via OGE Form 202 (as required by 5 C.F.R. 2638.206(a))?
- Yes **22**
 - No (specify why) **3**³²
 - Not applicable because no covered referrals were made to DOJ **112**
 - Not applicable (specify why) **0**

ADDITIONAL COMMENTS FOR PART 10. [See Part 10 Comments](#)

³² Two of the three referrals were subsequently submitted to OGE. For the third referral, the agency is working with OGE on how to properly submit the form.

PART 11. ETHICS PLEDGE ASSESSMENT

48. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service ((SES), Schedule C, etc.) appointed to or by your agency from January 1 through December 31, 2020?

- Yes **61 (45%)**
- No (*skip to #51*) **76 (55%)**

Note: For guidance on what constitutes a full-time non-career appointee for purposes of the Ethics Pledge, see [LA-17-03](#), available at www.oge.gov.

49. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2020, and indicate the number who did and did not sign the Ethics Pledge.

Number of Full-Time Non-Career Appointees	Type of Full-Time Non-Career Appointees by Category					
	PAS	PA	Non-career SES	Schedule C	Other	Total
a. Appointed 01/01/2020 – 12/31/2020	65	9	150	511	76	811
i. Signed the Ethics Pledge in 2020	49	8	141	483	48	729
ii. Required to sign the Pledge in 2020 but signed in 2021	0	0	0	0	1	1
iii. Required to sign the Pledge, but did not sign (please explain)	0	0	0	4	3	7
iv. Not required to sign the Pledge because occupied an exempt non-policy-making position (Schedule C or other comparable authority)	0	1	0	6	6	13
v. Not required to sign the Pledge because appointed without break in service after serving in another	15	0	9	18	18	60

position for which the Ethics Pledge was already signed						
vi. Not required to sign for another reason (please explain)	1	0	0	0	0	1

For each appointee identified in line iii, please explain why that appointee did not sign the Pledge. [See Question 49 Table 1](#)

For each appointee identified in line vi, please explain why that appointee was not required to sign the Pledge. [See Question 49 Table 2](#)

If applicable, please explain discrepancies between the number appointed and the number who signed or did not sign the Pledge. [See Question 49 Table 3](#)

50. How many appointees appointed between January 1 and December 31, 2020, and subject to the Ethics Pledge were registered lobbyists during the two years prior to their appointment? **6 (1%)**
51. Section 3 of Executive Order 13770 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted to appointees in your agency in 2020, the names of those individuals granted waivers in 2020, and which of the Pledge paragraphs were implicated.

	Number of Ethics Pledge Waivers Granted By Pledge Paragraph	Name(s) of Individual(s) Granted Ethics Pledge Waivers
a. Paragraph 1	0	
b. Paragraph 2	0	
c. Paragraph 3	0	
d. Paragraph 4	0	
e. Paragraph 5	0	
f. Paragraph 6	3	William Barr Eugene Scalia Adam Gustafson
g. Paragraph 7	0	
h. Paragraph 8	0	
i. Paragraph 9	0	
j. Other (please explain)	0	

If other, please explain. [See Question 51](#)

52. Were there any violations of the Ethics Pledge during 2020?

Yes **0 (0%)**

No **137 (100%)**

53. Please provide information on enforcement actions taken in 2020 as a result of violations of the Pledge (regardless of whether the violation itself took place in 2020 or earlier). [See Question 53](#)

ADDITIONAL COMMENTS FOR PART 11. [See Part 11 Comments](#)

PART 12. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

54. How many Special Government Employees (SGEs) did your agency have, in total, during calendar year 2020? **34,609** (if zero, skip to Additional Comments for this Part)
55. How many SGEs who was expected to serve for 60 days or less on a board, commission, or committee were required to receive Initial Ethics Training (IET) by December 31, 2020 (5 C.F.R. 2638.304(b)(2))? **22,906**

a. How many of those SGEs received IET before or at the beginning of the first meeting?	21,408 (93.5%)
b. How many of those SGEs received IET after the first meeting?	88 (0.4%)
c. How many of those SGEs have not received IET as of today?	1,412 (6.2%)

If applicable, please explain why some SGEs received IET after the first meeting or have yet to receive IET. [See Question 55](#)

56. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2020, and the number of reports actually filed by December 31, 2020.

	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
a. Advisory Committee Members (FACA)	23,990	23,749 (99%)	14	14 (100%)
b. Advisory Committee Members (non-FACA)	406	391 (96%)	0	0
c. Experts/Consultants	2,003	1,992 (99%)	33	31 (94%)
d. Board Members	215	201 (93%)	17	16 (94%)
e. Commissioners	122	111 (91%)	9	9 (100%)
f. Other	1,477	1,092 (74%)	77	77 (100%)
TOTAL	28,213	27,536 (98%)	150	147 (98%)

Example for new entrant and termination reports: If an employee joined/depended the agency on December 15, 2020, and filed a new entrant/termination report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant/termination report, do not count that report in your required numbers. Instead, include the report in your 2021 questionnaire response to be filed in 2022.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. [See Question 56](#)

57. Note the number of SGE disclosure reports certified or otherwise closed by your agency during the calendar year. Of those reports, indicate how many were initially reviewed within 60 days and how many were certified within 60 days. "Initially reviewed within 60 days" means having completed a technical review and conflicts analysis. See 5 C.F.R. 2634.605, section 4.02 of the Public Financial Disclosure Guide, and the Certification Requirements section of the Confidential Financial Disclosure Guide.

	Confidential Reports	Public Reports
a. How many reports did your agency certify or close in 2020?	27,218	134
b. Of those certified or closed in 2020, how many were initially reviewed within 60 days?	27,015 (99%)	129 (96%)
c. Of those certified or closed in 2020, how many were certified or closed within 60 days?	26,519 (97%)	117 (87%)

If applicable, please explain why some reports were reviewed more than 60 days after submission. [See Question 57 Review](#)

If applicable, please explain why some reports were certified or closed more than 60 days after submission. Check all that apply.

- additional information was being sought **13**
- remedial action was being taken **3**
- other (specify) **16**

[See Question 57 Certify](#)

58. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. 2634.904(b): **21,641**

59. Extensions and late filing fees for SGE financial disclosure reports:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
a. Number of OGE Form 278e Reports	68	7	1
b. Number of OGE Form 450 or OGE-Approved Alternative Forms	989		

ADDITIONAL COMMENTS FOR PART 12. [See Part 12 Comments](#)

ADDITIONAL QUESTIONNAIRE COMMENTS: [See Overall Comments](#)

Appendix

Question 6

CSOSA had one contractor attorney who, when receiving ethics related question on her assigned helpdesk duty day, routed the ethics questions to the DAEO or ADAEO for disposition and follow up. The contract attorney transferred to an FTE position in July 2020, so there is no further contractor involvement in the agency's ethics program.
Presidential Transition
ATF: legal research, case review. USMS: contractor paralegal performs preliminary OGE Form 450 review.

Question 7a

Department of Defense
Department of the Army
Department of Justice Office of Inspector General (DOJ OIG)
Office of Administration (OA) White House Counsel's Office (WHCO)
Department of the Army
DoD Standards of Conduct Office
Department of Commerce
Department of Defense-Department of the Army
U.S. Army, Executive Agent for the Financial Disclosure Management (FDM) electronic filing system.
US Dept. of Army and FDOnline
Farm Credit Administration
General Services Administration
Department of Commerce
U.S. Department of State
Department of Treasury, Bureau of Fiscal Service
Department of the Army
DoD Standards of Conduct Office, NSA and ODNI
Bureau of Fiscal Services/Treasury
DOD and OA
CIA
White House Ethics Office
Army
We receive support from the Department of the ARMY to use their financial disclosure management system (FDM).
Office of Special Counsel (OSC)
The U.S. Department of Housing and Urban Development (HUD).

Question 7b

Ethics Counseling

The ASBCA's GS employees are hired via the Army's civilian personnel system. Army provides prospective employees with required ethics notices.
DOJ OIG provided supplemental legal services to the agency, including ethics services. During the reporting period, the ADAEO was an employee of DOJ OIG.
The Council on Environmental Quality (CEQ) is a component of the Executive Office of the President (EOP). These two other offices within the EOP provided general ethics support to CEQ in 2020.
Financial Disclosure Management (FDM)
Used as a sounding board for advice and provided personnel to assist with training on the Hatch Act prior to election season and the 2020 Presidential Election.
The Department of Commerce provided the review for the 1 financial disclosure for the PAS and also provided information regarding a few ethics questions throughout the year.
Financial Disclosure Management System
Provides FDM electronic filing system for Confidential Financial Disclosure reporting.
E-filing of OGE 450 reports.
The FCA ethics staff runs both the FCA and FCSIC ethics programs, through interagency agreement. We are housed in the same building, and FCSIC uses FCA for many of its services, such as Human Resources, Information Technology, Ethics, and FOIA.
Various questions answered relating to travel and attending events.
Public and Confidential Financial Filing support, General Advice support
IJC employees utilize the distance learning ethics training provided by the Department of State.
NARA uses a USG shared services provider (through an IAA) for certain Human Capital services. For example, the provider prepares and sends offer letters and includes ethics information in those letters.
NCUA uses the Army's FDM system for managing the agency's OGE 450 confidential financial disclosure reports.
Post-Government employment support and public financial disclosure reporting support
Provides ethics notices in offer letters to new hires.
DOD: provides information, tech & comms support to EOP OA: annual ethics training and Hatch Act training
Ethics Compliance Tracking System
certifies all Public Financial Disclosures of Commissioned Officers
Worked with Army to set up use of their Financial Disclosure Management (FDM) system for our confidential financial disclosure report filers in 2021.
We use their FDM system and they provide Help Desk support if we have problems with the FDM website or accessing the website. They don't provide any services related to the review of the reports.
We requested guidance on SGEs, and SGEs and the Hatch Act.
HUD's Ethics Office administers USICH's ethics program.

Question 8a

Federal Deposit Insurance Corporation (FDIC)
Defense Technical Information Center (DTIC) and Defense Standardization Program Office (DSPO)

Delta Regional Authority, Federal Mine Safety and Health Review Commission, and the Gulf Coast Ecosystem Restoration Council
The Army's Financial Disclosure Management (FDM) Program provided financial disclosure report filing support to the Office of the Secretary of Defense, Department of the Air Force, Department of the Navy, Armed Services Board of Contract Appeals, Defense Contract Audit Agency, Defense Counterintelligence and Security Agency, Defense Commissary Agency, State Department, Defense Finance Accounting Service, Department of Homeland Security, Defense Intelligence Agency, Defense Information Systems Agency, Defense Logistics Agency, Department of Defense Inspector General, Defense Threat Reduction Agency, National Credit Union Administration, National Geospatial-Intelligence Agency, Office of Government Ethics, Special Inspector General for Afghanistan Reconstruction, United States National Guard, Uniformed Services University of the Health Sciences, and the Veterans Administration.
National Assessment Governing Board & National Council on Disability
United States Interagency Council on Homelessness (USICH)
Council of the Inspectors General on Integrity and Efficiency (CIGIE)
Women's Suffrage Centennial Commission
Farm Credit System Insurance Corporation (FCSIC)
International Boundary Commission
Users' Advisory Group of the National Space Council for the White House Office.
Public Interest Declassification Board
DoD Standards of Conduct Office
Cost Accounting Standards Board
National Space Council
Social Security Advisory Board
FACA Committees - Board for International Food and Agricultural Development (BIFAD) and Advisory Committee on Voluntary Foreign Aid (ACVFA)
BBG Board of Directors until its dissolution in June 2020

Question 8b

The Bureau's Director serves on the Board of Directors for the FDIC. Prior to each FDIC Board meeting, the Ethics Office reviews all Board cases for potential ethics issues and provides ethics guidance to the Bureau Director in connection with her FDIC Board duties, as necessary.
Advice, training and financial disclosure reviews and certifications.
Technology
The Army's Financial Disclosure Management (FDM) Program provided financial disclosure report filing support to the Office of the Secretary of Defense, Department of the Air Force, Department of the Navy, Armed Services Board of Contract Appeals, Defense Contract Audit Agency, Defense Counterintelligence and Security Agency, Defense Commissary Agency, State Department, Defense Finance Accounting Service, Department of Homeland Security, Defense Intelligence Agency, Defense Information Systems Agency, Defense Logistics Agency, Department of Defense Inspector General, Defense Threat Reduction Agency, National Credit Union Administration, National Geospatial-Intelligence Agency, Office of Government Ethics, Special Inspector General for Afghanistan Reconstruction, United States

National Guard, Uniformed Services University of the Health Sciences, and the Veterans Administration.
Advice, counseling, ethics training, and financial disclosure review and certification.
HUD's agency ethics officials administer all portions of an ethics program for USICH.
OIG: Assistance with financial disclosure and consultations re: attendance and speaking at events.
FACA-related legal advice
The FCA ethics team serves as the ethics team for FCSIC. FCSIC is a small Federal corporation that shares many services with FCA.
Financial disclosure program and counseling.
Provided ethics program services including financial disclosure review, ethics training, and ethics advisory services for the Users' Advisory Group of the National Space Council.
NARA provides ethics support to the Public Interest Declassification Board, an independent board. The Information Security Oversight Office, which is part of NARA, serves as the Executive Secretariat for the PIDB and it can call on other NARA offices for support. NARA is authorized to expend its appropriations on PIDB activities, as PIDB does not receive any appropriations directly.
Employee detailed for six months
Addressed any potential ethics and conflicts issues with SGEs serving on Board. Provided specialized training to SGE's serving on Board.
Ethics reviews for proposed events
Initial financial disclosure review and ethics training.
ethics education and guidance
Ethics counseling, training and reviewing financial disclosure forms

Question 9

Budgetary.
Budgetary
Improved technology to support innovative ethics training.
Budgetary
Budgetary
Budgetary
Increase in budget for ethics program.
We continue to identify needs for which we need additional funding, such as converting legacy training modules and developing a replacement for the platform currently used for supporting the ethics travel forms.
We continue to evaluate options for an electronic filing system for confidential filers. We continue to develop our ethics personnel through in house training and OGE resources. Additional resources from OGE on topics for new employees and program management would be helpful. Four FTEs supported the ethics program throughout 2020, and a new administrative officer was hired in August 2020, who we continue to train to support the ethics program.
Budgetary

Question 10

Small agency with no ethics staff.
The Executive Director is one of two ethics staff.
The Agency consists of 5 SGEs, 1 FTE, and a few detailees.
USADF Ethics Office had on

Question 12

IT, Technology Investment Committee
Human Resources
OGE, ADAEO
ADAEO, Army Human Resources Leadership, Legal Advisors, Senior Leadership/Chain of Command of the organization assisted.
Ethics program review reports go to the following individuals at the reviewed component: the component head, Deputy Ethics Counselor (DEC), and Ethics Coordinator (EC). Our procedures also allow the DAEO to send the reports to the HHS Secretary as needed.
Other department leadership.
The ADAEO & HUD Ethics Program Staff.
Heads of Components, Deputy Designated Agency Ethics Officials, General Counsels within components, DEA: CFO.
Ethics Counselors for each Bureau and Office in the Department.
Component Chief Counsels, Deputy Chief Counsels, and Component Deputy Ethics Officials
KPMG conducts financial audit of one bureau.
Office of Chief Financial Officer - Internal Audit Committee
U.S. Government Accountability Office (GAO)
Audit of outside activity approval system was completed at the end of 2020 results will be reported to Agency Head, DAEO, and General Counsel.
ADAEO.
The Ethics program routinely reports certain program metrics through the agency's internal controls program.
CFO
The IG audited NSF's IPA conflict of Interest procedures and advice as part of a larger audit of the IPA program. The report has not been issued.
The DAEO, ADAEO, and an ethics official met with the Agency Deputy Director and other Agency senior leaders to review the Agency ethics program.
The ethics program is discussed with agency leadership in monthly meetings. The meeting includes agency leadership who report directly to the agency head. We also worked with internal controls staff to track any audit responses and regular reporting obligations.
Executive Director
OGE's Privacy Act attorneys
CHCO(HR)
We are currently being reviewed by OGE. While we were gathering the materials to send to OGE, it created the perfect opportunity to evaluate our program and find areas we think we can improve. All members of our ethics team are part of the Office of General Counsel, so we 'reported' to ourselves and the materials to OGE.
The Ethics Office did an ethics enterprise risk management assessment to help prioritize resources and target training.

Question 13

<p>New guidance was developed regarding outside activities--namely, outside writing and use of official title.</p>
<p>USADF's ADAEO met with USADF's Office of the President routinely to assess the Ethic Office's effectiveness and responsiveness to adapt to a newly remote work environment, including training modules.</p>
<p>Initial ethics briefing support utilization of electronic ethics briefings</p>
<p>Some upgrades in ethics IT programs (electronic financial disclosure) and proposed future upgrades to ethics IT programs</p>
<p>In calendar year 2020, the agency underwent an OGE Ethics Program Inspection, which evaluated all aspects of the CSB ethics program. The CSB did not have established procedures for initial ethics training or for issuing notices to prospective employees prior to June 2020. Newly established procedures include a provision that the DAEO is required to review the new procedures by January 31, each year.</p>
<p>Created individual spreadsheets for employees to track ethics counseling, waivers, and advice.</p>
<p>We will be changing our training program to develop individualized training for each of the Commission's Divisions. We have also begun the process of updating our invitational travel policy and our outside speaking policy.</p>
<p>The Ethics Office was reviewed as part of a Bureau-wide client customer satisfaction survey of the offices in the Bureau's Legal Division in late January 2020. The responses and comments directed at the Ethics Office staff and program were very complimentary and did not warrant any material changes.</p>
<p>In 2020, CEQ implemented additional ethics training for political appointees and expanded its off-boarding ethics training in anticipation of the Presidential transition.</p>
<p>The ethics office created a dedicated email address for ethics-related inquires and financial disclosures, and increased use of agency-wide emails, on topics such as Hatch Act/election season, seasonal gifts, etc.</p>
<p>The DeCA OGC completely revised its Ethics Standard Operating Procedure to ensure its ethics program meets all requirements under the CFR, that every procedure is captured in writing, and clearly setting for the interaction between OGC and DeCA HR in implementing all aspects of the program.</p>
<p>We have increased our time briefing the senior level staff and their deputies by providing more face to face training. Published more articles on our internal website and our Agency's TV/DISA Dateline website.</p>
<p>Instituted NIPR SharePoint tracking mechanism to track all incoming requests for ethics advice and opinions. Provided additional assistance by way of an additional attorney to assist with the workload.</p>
<p>Leaders participated with counsel in all the annual ethics training sessions. Also added a website for employees to access for information and forms. Included a video from the Director addressing ethics for our online interactive ethics training.</p>
<p>As a result of the evaluation, we are conducting a detailed review and revision of all of our ethics program policies and procedures. Specifically, we issued a new detailed policy on the processing of Presidential nominations, and we are in the process of drafting a new</p>

<p>policy/procedure governing the overall operations of the ethics program (e.g., required ethics trainings and notices).</p>
<p>Programmatic changes: We developed a new SOP between the GC Office and HR Department to ensure DTRA meets the regulatory notification requirements. Policy changes: All new employees are now notified that they need to complete live, instructor led training (via Skype) within their first 60 days, to ensure they meet the regulatory requirement for interactive ethics initial training within 90 days of their arrival.</p>
<p>The Commerce Ethics Office expanded the use of virtual training, and efforts increased to procure an electronic filing system for the OGE Form 450 reports.</p>
<p>Changes in Standards of Procedure, and engagement with HR offices.</p>
<p>Programmatic changes included additional staffing to improve rate of financial disclosure reviews, improved coordination with Army Human Resources offices, improved procedures for issuing cautionary notices, addition of ethics offices to in and out-processing checklists, better documentation of OGE 450 conflict of interest and extension documentation, clarification of initial ethics training procedures, and creation of electronic repositories of prior ethics opinions. Policy changes included increased HR support to Army ethics programs, incorporation of ethics notice to new supervisors into the new supervisor's final job offer, and Army-wide clarification of supervisor ethics notice issuance and initial ethics training procedures.</p>
<p>The Navy is undergoing an OGE Program Review and as a result updated its standard operating procedures for Initial Ethics Training, Issuance of notice of ethical obligations in written offers of employment, and issuance of ethics notices to new supervisors. Additional, several commands did internal reviews that resulted in updates to local policies on various topics such as training, and gift/coin tracking.</p>
<p>Programmatic changes: The DAO makes programmatic changes as needed during bi-weekly DAEO meetings. For example he requested ethics training presentations be identified on the GC calendar. Policy changes: The DAO makes policy changes as needed during bi-weekly DAEO meetings. For example all Ethics Program team members are either Agency or Alternate Agency Administrators in the INTEGRITY electronic filing system. This will ensure three personnel working INTEGRITY have permissions to add filers, assign new reports, and manage assigned reports in the system. Because DoD OIG/OGC has a policy to ensure at least one team member is on duty during the regular work week, there will always be someone available to administer INTEGRITY filer matters. This policy change was made in response to an OGE Ethics Program Inspection Report Comment.</p>
<p>Increased use of technology to track compliance data and utilize virtual training platforms. In process of updating DoD Joint Ethics Regulation and Federal Advisory Committee Act (FACA) Instruction.</p>
<p>Agency components continue to digitize and automate ethics programs for easy information storage, retrieval, and utilization. Examples include: improving the HHS ethics intranet site (with an overhaul in development), launching an electronic reporting system for outside activities, incorporating FACA SGEs into one component's electronic filing system, building out internal tracking systems, and creating dynamic forms. Additional program improvements may be recommended on a case-by-case basis, including increases in staffing and staff cross-training, among others. Additional agency components have added requirements for all of the component's employees complete annual ethics training, regardless of financial disclosure</p>

<p>filing status. Additionally the agency continues to update agency ethics policy based on regulatory updates and changes.</p>
<p>Identified financial disclosure oversight issues, addressed with expanded electronic filing for confidential financial disclosure. Expanded use of electronic filing resulted in updates to policy.</p>
<p>HUD modified its process for OGE-278 late filing fee assessment.</p>
<p>Programmatic: enhanced coordination with HR, updated ethics training, increased staff and hours spent tracking the ethics program, enhanced financial disclosure review. Policy: ethics training modifications, enhanced OGE Form 450 policies, ATF: updated policy on teaching, speaking and writing.</p>
<p>No changes were necessary based on results.</p>
<p>Use of "On the Move" Notice to Management Officials to update filers, reviewers, etc. twice a year. Set internal goal for certification of all PAS and other Financial Disclosure Reports prior to end of year. Set certification timeliness goals for individual ethics staff members. Forwarded delinquent annual filers of OGE--278 and OGE-450 filers to Human Resources for appropriate disciplinary action. Increased annual training reminders for OGE-278 filers.</p>
<p>Programmatic changes: As a result of ethics program assessments in 2020, the DEO improved external coordination with Human Resources officials and internal tracking. Ethics officials improved the process for special Government employees. Policy changes: In addition, and as a result of the assessments, the DEO revised internal policies and standard operating procedures to reflect any identified needs.</p>
<p>Agency-wide, DOT ensured the collection of 450s and the completion of ethics training in a virtual environment. One component added 450 reviewers. A second component adjusted the process of identifying 450 filers. A third component sent notifications of training requirements earlier in the calendar year.</p>
<p>At DO/HQ, refined process for pre-vetting new employees hired for specific duties and programs (e.g., CARES Act) examined OFR employment offer letters to ensure inclusion of additional OFR post-employment restrictions reviewed accuracy of Integrity filer "background" data (e.g., position, filer appointment type, etc.) and updated as appropriate and procedural changes for review and reporting of gifts. At one bureau, amplified written instructions for financial disclosure reviewers to provide additional guidance on when to add a reviewer's comment in connection with a reported outside activity encouraged one district to add reviewers to redistribute reviewer's workload. Policies were updated at one bureau new policies established at another bureau. At one bureau, no changes resulted because audit was not completed.</p>
<p>Working with VA's Office of Compliance and Business Integrity to leverage their staff as deputy ethics officials. This will increase availability of deputy ethics officials. Meeting regularly with DAEO, who is a member of the OGC Leadership team, to update staffing needs and program changes.</p>
<p>PROGRAMMATIC CHANGES: EPA implemented LEAN methods to streamline existing operations. The EPA Ethics Office identified two statutory deadlines (reviewing 278s and releasing 278s through OGE's 201 form) for improvement. We had moved to an electronic 450 filing process in January 2020, which was providential given the pandemic. Although our alternative confidential filing system for SGEs is not automated, the fact that DFOs and DEOs could not access hard copy files readily encouraged them to move to electronic filing instead of relying solely on paper filing. POLICY CHANGES: To meet the goals of our</p>

<p>ELMS measures, we focused on our 278 review and certification process. We increased the number of reviewers and emphasized the need for 278 filers to answer clarifying questions promptly so that we could finalize review. We instituted a more routine process for assessing late fees. For counseling, we continued to emphasize our shared mailbox (ethics@epa.gov) to channel questions so that we could better track and assign incoming questions. On the training front, we got the Agency to include our online Initial Ethics Training course as part of their mandatory curriculum for all new employees.</p>
<p>Program: Adoption of new Code of Business Conduct and Ethics all employees must acknowledge receipt and agree to abide by contents on an annual basis. Policy: Revised Conflicts of Interest and Financial Disclosure Policies, including requirement to notify the DAEO in writing of any recusals.</p>
<p>Our internal review resulted in a satisfactory review of the program. No changes were deemed necessary.</p>
<p>Our internal review resulted in a satisfactory review of the program. No changes were deemed necessary.</p>
<p>GAO reviewed the FDIC's post-employment counseling procedures in conjunction with a review of regulatory capture at financial regulatory agencies. GAO issued their report in September 2020. GAO made four recommendations to our agency related to managing the risk of regulatory capture, including revising examiner-departure processes. Our agency is currently implementing a process for identifying when to review the work papers of departing examiners to assess whether their independence has been compromised.</p>
<p>We continually seek to improve accessibility of our online Ethics training, with respect to disabled employees in particular. PASs are now routinely provided the option of in-person training in lieu of online training.</p>
<p>Proposed recommendation is to require employees to complete outside activity approval forms every 2 years, renewing or advising that they are no longer applicable.</p>
<p>The agency had adequate number of ethics officials and resources in spite of the disruption and teleworking caused by COVID-19.</p>
<p>We completed an internal audit of confidential financial disclosure filers and that audit resulted in changing some files and new policies and procedures between the ethics office and Human Resources regarding filer determinations and notifications of personnel actions (promotions, new duty assignments, etc.) that may affect the financial disclosure decision. We decided on a new format for the annual filer training and created new training program.</p>
<p>We evaluated and discussed how to continue with ethics training when we did not have a presence in the office. Most of our training was in person. We developed ways to include the discussions into team meetings and share other resources.</p>
<p>Due to COVID-19 virtual environment, ethics officials determined that additional training would be required to keep agency staff more in touch with the agency's ethics program. As such, increased staff briefings were instituted for the remaining parts of 2020 and two minute e-mail ethics clips were incorporated in the training agenda for 2021.</p>
<p>The IAF created an ethics inbox to streamline all agency ethics inquiries, added a Quarterly Ethics Newsletter that is distributed to the entire agency, developed instructional primers on different topical areas such as gifts, education, advocacy, and lobbying and changed the ethics instruction for our SGEs to live ethics training. The IAF drafted new ethics written procedures for the following: public financial disclosure issuing notices to prospective employees notices to supervisors initial ethics training confidential financial disclosure. We</p>

also updated the IAF' Commitment to Government Ethics, revised our outside activities forms and WAG form and revised our gift reporting processes.
We trained all employees in a live training via TEAMS, not just those required to file a 450 Confidential Financial Disclosure, and provided a booklet on Ethics to all employees the training content was also updated.
We have decided to move training closer to the beginning of the year, if feasible. We have decided to increase supervisor involvement when assessing outreach events to ensure easier filing of 1353 reports and more equitable assignment of outreach activities
Nom changes deemed necessary given small agency size and issues presented.
Improved ethics onboarding-offboarding procedures for public filers. Expanded protocol officer training. Working to clarify enterprise policy for certain HR notifications potentially implicated by agency-wide reorganizations. Ethics Program Tracking System (EPTS): Added enhanced conflict recognition capability identifying entries matching agency procurement and agreements lists. Updated filing tips communicated to filers to assist in correct data entry and conflict recognition. Added an indicator for reviewers reflecting for which forms a filer had nothing to report.
The program reviewed and updated certain processes as a result of transitioning to 100% telework due to the pandemic.
In March 2020, the NCUA Board voted to create the agency's Office of Ethics Counsel. The new office is led by a senior executive Chief Ethics Counsel who serves as the agency's DAEO. The Chief Ethics Counsel reports directly to the NCUA Board and is supervised by the NCUA Chairman.
Changes to the ethics programs and policies largely involved efforts to maintain existing structures in the face of operational changes occasioned by the pandemic.
No specific changes. A survey was conducted and shared with the Chairman to measure perceptions of the ethics program, it was agreed that the ethics program would continue to send out periodic updates and promptly review requests.
1. Ethics program changes - (1) Updated outside employment policy and reporting form and, (2) Heightened accountability for reporting OGE 450 filers' compliance with annual Standards of Conduct training requirements by supervisors. 2. Pending policy change - Department of Defense-wide efforts on-going to define the scope of the agency's annual financial statement audit and coordinating responses to independent audit agency's review of ethics program
Program Changes - Agency leadership agreed to allow employees from other NLRB offices to perform temporary details in the Ethics Office to support the ethics program and maintain a high level of customer service while the office was in the process of hiring permanent employees to fill existing positions. In addition, the Ethics Office was able to use an IT contractor to assist with the development of web-forms and to upgrade the Ethics Office's internal SharePoint page. Policy Change - The Ethics Office developed a new process for updating and managing the distribution of PAS recusal lists to ensure that appointees are properly screened.
Update Agency Ethics policy manual update New Hire/ New Supe. letter template sent by Dept. of Interior, the NMB's HR contractor. Ethics office now also reviews each proposed position description prior to posting to determine disclosure report filing status.
The final report has not been issued

<p>During the ethics meeting with senior leadership, the ADAEO proposed coordinated cascading messaging with leadership regarding financial disclosure reporting requirements to support messaging from OGC and enhance timely compliance. The ethics team is working to implement that coordinated messaging during the 2021 filing year.</p>
<p>We regularly evaluate our program for areas of improvement and have regular discussions with agency leadership about those efforts. We began regular meetings with human resources officials to improve the coordination between our offices. We continue to develop how we deliver and track our ethics advice. We conducted a survey of employees in advance of developing the 2020 AET. We also received positive and important feedback through an agency-wide survey following the 2020 AET. That information will help improve the development of our 2021 annual ethics training, targeted training opportunities, and employee advice.</p>
<p>Various modifications were made to support full time work at home due to ongoing public health emergency. Training was reformatted to support virtual completion. Additional agency-wide announcements and voluntary training sessions were made addressing the Hatch Act in advance of the Presidential election.</p>
<p>Continued development of ethics directives provided more specification of check-in/out processing</p>
<p>Written Ethics Program was updated during OGE audit of Ethics Program per OGE's recommendation - program and policy itself did not change, but procedures were more clearly spelled out. New employee offer letters (also for supervisors) were updated to include all required information.</p>
<p>Due to COVID, a lot of ethics services were switched from in-person to virtual offerings.</p>
<p>OGE's ethics program did a Privacy Act Impact Evaluation of its ethics program records and received no recommendations for changes.</p>
<p>Continuous process improvement, enhanced on-line ethics system, enhanced focus on groups of employees with complex ethics posture.</p>
<p>Moved from in person to online training due to the coronavirus pandemic.</p>
<p>updated guidance on ethics regulations and held ethics meetings for staff to attend</p>
<p>Supplemental ethics rule on prior approval for outside activities drafted.</p>
<p>In preparation for new ADAEO, written procedures and processes were reviewed and updated. Because of COVID, changes were made to create virtual initial and annual ethics training.</p>
<p>Ensured system that was made to better track aspects of our ethics program is still accurate and useful for staff</p>
<p>Using the OGE recommended questionnaire, we worked with management officials to conduct a review of all our OGE 450 filers. The review resulted in determinations that numerous, previous filers were no longer required to file. Overall, our list of OGE 450 filers was reduced from 396 to 240 individuals, which is a 39.4% reduction that removed 156 filers. We initiated the purchase of an online confidential financial disclosure management system from the Army. We began the process of bringing on a detail from OGE to assist us with our program. However, that has been temporarily derailed by the COVID-19 pandemic. We continue to work with HR to streamline our communications regarding ethics requirements for employees.</p>
<p>Nothing was reported to the DAEO re changes needed.</p>

needed to accept electronic signatures on financial disclosure forms and convert all training from live in-person to live WebEx due to COVID
We instituted continuous ethics briefings and training to Board Members based on issues that arose or latest guidance from OGE or White House. e.g. Hatch Act, Gifts.
Changes to how training is tracked.
PCLOB had its OGE ethics assessment this year, and the DAEO/ADAEO implemented all recommendations therefrom.
We are currently in preliminary stages of making adjustments based upon the assessment feedback. Changes have not yet been implemented.
We noticed some issues with the current Excel sheet we were using to track information. We decided the document was far too large and not saving our updates appropriately. We have developed a new Excel sheet for 2021 that is separate from our old sheet. This Excel sheet takes up less memory and we are hoping it will save our changes. We also switched to Integrity last year for 278 filers to avoid any issues we were having with FDM.
The ethics program was included in the agency's annual audit by KPMG. They found no discrepancies.
Annual ethics training topic scope and focus was adjusted to include areas of high risk for the agency and the implementation of electronic interactive tools during training, such as using interactive polls. Clarified and ensured procedures, practices, and policies were in writing. Modifications to ethics training procedures to include virtual learning environments and record keeping.
As the result of an OGE Ethics Audit, the USAID Ethics Office is currently rewriting the entire Ethics Policy document (ADS 109) with a particular focus on how the Ethics Office manages the identification of new Confidential Financial Disclosure filers and the identification of both new and termination report filers at the USAID Missions overseas.
Looking into technology to convert confidential financial disclosures from paper to online. Seems cost prohibitive for a small agency like ours.
The DAEO and ADAEO discussed the current ethics program's needs and evaluated what resources were needed, if any. At this time no additional resources are needed to administer the ethics program but the DAEO continues to monitor for future resource allocation.
We created brand new user friendly internal and external ethics websites. We created ethics posters for all facilities as well as "public service is a public trust" training for all employees. We are in the process of creating an ethics app for smartphones. We also made changes to our procedures regarding new entrant filers and updated to the notices for new employees.
The Ethics Office customized the content of live annual training (via Teams) to better target the different ethics challenges faced by agency employees resulting from their various official duties and functions.
General policy updates and clarifications including changes to SGE filing policies and practices.

Part 4 Comments

Question 3 - USADF's ADAEO (since 2017) served as Acting General Counsel, in turn becoming lead of the USADF Ethics Office. The USADF General Counsel/Ethics Office is planning for additional staff by mid-CY2021.
Question #14: In addition to written procedures selected via checkbox, the Access Board also has written procedures that address: STOCK ACT notices inclusion of ethics notices in

<p>employments offers to new employees disqualification from rulemaking (i.e., conflicts of interest).</p>
<p>Because only the agency head is required to file financial disclosure and there are no intermediate supervisors, BGSF does not maintain written procedures for these activities. Also, please note that in our 2019 annual questionnaire, in Part 4, Q3 f. should correctly read 1.</p>
<p>Question 2 - answer is classified. Question 3f - the DAEO is a PAS official who provides direct support to the Agency head. Question 5 - the employees identified as working "less than 1 hour per week" are those who support the financial disclosure program.</p>
<p>#11--Our agency underwent an OGE Ethics Program Inspection in Calendar Year 2020, and therefore, we reviewed and evaluated most aspects of our ethics program.</p>
<p>The CFA written procedures for Issuance of notice of ethical obligations in written offers of employment is currently in draft form and undergoing review.</p>
<p>Question #5: One Deputy Ethics Official retired in January. Another Deputy Ethics Official retired in June. In June, the program gained a full-time Supervisory Attorney-Advisor serving as ADAEO. The program currently is staffed with a DAEO, ADAEO, 2 Deputy Ethics Officials and an Ethics Program Specialist.</p>
<p>In regards to Question 1, reporting on this Annual Questionnaire also includes data from the Pretrial Services Agency (PSA) for the District of Columbia.</p>
<p>All written procedures called for in Q. 14 are contained in the agency's newly revised Ethics SOP. This new manual sets forth in detail every aspect of the ethics program process, including but not limited to the 4 topics above. DeCA continued with its model practice of publishing periodic ethics notices, known as DAEOGrams, noted and described in detail in DeCA's 2020 response.</p>
<p>Questions 5 & 9: DCSA is in the process of training and appointing additional employees to perform ethics program duties.</p>
<p>N/A</p>
<p>The GC regularly communicates the resource needs of the Office, to include the Ethics Program, to the Chief of Staff and Agency's Resource Board.</p>
<p>The agency head has retained the duties of the DAEO. The Chief of Staff engages in ethics for the DRA. While not a federal employee, he helps facilitate contacts between the federal employee, Department of Commerce, and OGE for provision of ethics advice, training, and review of financial disclosures reports.</p>
<p>Q. 12-The Department of the Navy policy requires each Admiral staff to conduct an annual ethics audit. Additionally, the Naval Inspector General or command Offices of the Inspector General conduct periodic command inspections. These inspections include the command's ethics program as an assessable unit.</p>
<p>During the initiation of telework operations for the COVID pandemic, ethics training presentations were originally provided via email and conference calls. Ethics presentations are now provided through video and audio communications platforms which include polling and survey functions used for interactive participation.</p>
<p>Question #5: One employee provides services to employees in Washington, DC, and is currently out-stationed outside of the DC area.</p>
<p>Q9. Technology: online OGE Form 450 system needed. Q10. DAEO meets with Agency Head designee.</p>

#8 Note: Our office provides support for the Fulbright Board, which is administratively housed in the Educational and Cultural Affairs Bureau at the Department of State.
Q2: 11,163 F/T seasonal employees are not included in above number. Q6: Some bureaus relied on IT support from contractors.
#3: Intention reduction of DAEO's time spent on ethics to next lower category compared to CY19. #14: Written Procedures for ethics notices to new supervisors not yet finalized. Notices did go out to all agency supervisors but written procedures for notify new supervisors still being discussed with officials in Offices of Human Capital
N/A
N/A
Question 11 - The Ethics & ADR Unit continued the review and update of our confidential financial disclosure procedures/filers as we finished our transition to the FDOonline financial disclosure filing system for our agency's supplemental forms.
N/A
Qu. 8, NASA is also collaborating with the US Department of Agriculture to develop an ethics training platform utilizing NASA robotic animation capabilities. Qu. 9, additional resources are not currently needed given expected hires. It is noted that a full-time senior ethics attorney left the agency at the beginning of the COVID-19 pandemic for which it took several months to backfill, and that an administrative support position vacated in 2020 is expected to be filled in 2021. Qu. 13 Also completed a regular update of agency-wide ethics program directives.
Question 7--NARA previously reported this as contractor-provided services but has corrected to report it as provided by another agency through an IAA. Question 14-The Agency has engaged with its shared services provider to begin issuance of the ethics notice to new supervisors.
Question #2- Data not included/is classified.
5b. 3 permanent full-time employees work outside the DC Metro area. The other 5 employees are field attorneys who were detailed to the Ethics Office. 4 were detailed for roughly 60 days during CY2020 and 1 for about 6 months. All performed both government and legal ethics work.
Based on a review of our procedures, the existing written procedures do not fully address the requirements of 2638.303. However, we do have a procedure in place that accomplishes similar goals. For each candidate receiving a tentative offer to join the agency, the candidate participates in an ethics intake. During the intake, the candidate provides information which would identify potential conflicts of interest. An agency ethics official describes the ethics program at the NTSB, the Standards of Conduct and criminal statutes that apply to all executive branch employees, and describes mitigation strategies if a potential conflict is identified. We also discuss the financial disclosure obligations that may exist for the position. We are working with the human resources group to update our procedures to satisfy fully the requirements of 2638.303.
With regard to question 9, we will need additional attorneys to support the anticipated growth in our ethics practice, particularly with the onboarding of many new staff and preparing for confirmation hearings of incoming appointees.
Question 10: Because we are a small agency, we do not have formal meetings to discuss our ethics program. However, the Special Counsel is in frequent contact with the DAEO and ADAEO regarding ethics matters.

The number of full-time employees as of December 31, 2020 is not publicly releasable information but can be provided to appropriately cleared OGE personnel upon request.
#10 - For purposes of ethics program administration, the Office Head is the Chief of Staff to the Vice President.
5. Previously, the General Counsel was our DAEO. When the number of direct hire staff at the agency dropped below 1,000, the DAEO position did not have to be filled by someone at the General Counsel level. So upon the General Counsel's departure, another Ethics attorney became the DAEO. Currently, we are a three-person team, consisting of a DAEO, ADAEO, and administrative specialist and each working on our Ethics program part time.
N/A
None
Question 2 - The increase in the number of employees is due to the activity generated as a result of the Pandemic.
RE question 2: The current number of full time agency employees include 703 FTE civilians and 1150 billeted active duty military personnel from the uniformed services. On previous reports we have only reported our federal civilian FTEs, however, in the interest of accuracy we have included our full time active duty.
We use GSA CABS to onboard new employees. This issue has been raised with OGE in the past. GSA CABS provides little to no ethics training or notice of ethical obligations when onboarding new staff for the client agencies which they serve.
N/A
Effective January 1, 2020, the Overseas Private Investment Corporation (OPIC) transferred all of its rights and obligations to the United States International Development Finance Corporation (DFC) under the authority of the Better Utilization of Investments Leading to Development (BUILD) Act of 2018, 22 U.S.C. § 9601 et seq. As a part of this process, all OPIC personnel transferred to DFC. Accordingly, readers should be aware that when comparing OPIC's 2019 numbers with DFC's 2020 numbers, the second set belongs to a separate and new agency.

Question 15

OHR is the only office responsible for reporting. OHR has been notified of the delinquency of this report and will submit a written determination pursuant to 5 C.F.R. 2638.310
The DAEO, on numerous occasions over the past several years has provided guidance, sample texts, and follow up reminders, regarding the information required by 5 CFR 2638.303 and the confirmation requirement in 5 CFR 2638.310 to USDA's Office of Human Resources Management (OHRM) and the Human Resources Offices for USDA component agencies. It is our understanding that most written offers of employment include the information required by 5 CFR 2638.303. However, USDA's Office of Human Resources has not provided the USDA Office of Ethics with specific confirmation that all of the issued written offers included the required ethics information in the format required by 5 CFR 2638.303. We believe that Human Resources Offices would be much more compliant with this regulatory requirement if OGE were to ask the Office of Management and Budget (OMB) Deputy Director for Management and/or the Director of the Office of Personnel Management (OPM) to remind Executive Branch Chief Human Capital Officers of their obligations under this regulation.
In calendar year 2020, HR offices were unaware of the requirement. However, beginning in September 2020, we started actively engaging with those offices to ensure that they were

aware of the requirement going forward, and they have complied with the requirement for the 15 Jan 2021 deadline.
The Director, Departmental Ethics Office (DEO), provides the DAEO with the required written confirmation.
Shouldn't this be YES? We do include this information in offer letters, I assume, and we did hire quite a few new employees.
Reorganization of NASA's human resources offices in 2020 resulted in reallocation of certain functions. Review of issuance and confirmation of prospective employee notices in the restructured organization is currently being conducted.

Question 16

There was only one offer of employment made in FY20. We are working with our HR provider to ensure written offers of employment include the information required by 5 C.F.R. 2638.303.
We believe the notice has been included but have been unable to confirm at this time.
Yes, our office SOP complies with the SOCO requirement.
The DAEO provided guidance and sample texts regarding the information required by 5 CFR 2638.303 to USDA's Office of Human Resources Management and the Human Resources Offices for USDA component agencies. It is our understanding that most written offers of employment include the information required by 5 CFR 2638.303. However, as noted in our comment above, the Office of Ethics has not received specific confirmation from USDA's Office of Human Resources that all of the issued written offers included the required information; As noted above in our response to Question 15, it is our understanding that most written offers of employment include the information required by 5 CFR 2638.303. However, USDA's Office of Human Resources has not provided the USDA Office of Ethics with specific confirmation that all of the issued written offers included the required ethics information in the format required by 5 CFR 2638.303. We believe that Human Resources Offices would be much more compliant with this regulatory requirement if OGE were to ask the Office of Management and Budget (OMB) Deputy Director for Management and/or the Director of the Office of Personnel Management (OPM) to remind Executive Branch Chief Human Capital Officers of their obligations under this regulation.
During an audit of our ethics program by OGE, we determined that the Office of Agency Services had a lapse in including the statements in offer letters for a short period of time. To remediate this issue, OAS established a policy to include the letter, and our ethics team initiated a periodic audit procedure for that process.
Ethics briefings were included in onboarding.
Only one offer during the year and, the notice was inadvertently omitted.
All written offers of employment for positions covered by the Standards of Conduct included the information required by 5 C.F.R. 2638.303.
In early March of 2017, the DAEO notified the then Director of the Office of Administration of the new requirement to provide written notices to prospective employees with the information required by 5 C.F.R. 2638.303. For reasons unknown to the DAEO, a written policy was never drafted, and the requirement was never implemented.
As described in the additional comments to Part 4, all of the candidates for potential employment with the NTSB participate in an ethics intake. Some of the information required by 2638.303 is described in the written materials provided with the tentative offer, and all of

the information is described during the initial intake. We continue to work with human resources officials to update the necessary language for the offer letters.
Offer letters for individuals required to file Public or Confidential Financial Disclosure Reports did not include information that those individuals would be subject to financial reporting requirements and that a new entrant report must be filed within 30 days of appointment. Offer letter templates have been updated to ensure that that information will be included, as applicable, in future offer letters. The template for new supervisor offer letters has been updated to include the text of 5 C.F.R. Â§ 2638.103.
the definition of agency in the Ethics in Government Act and applicable regulations does not include the Office of the Vice President
HRD was asked numerous times to comply with 5 C.F.R. 2638.303. HR is now including the required information in all offer letters.
Only two employees. Last hire was September 2020 and at that time GSA CABS provided no ethics information.
The standard offer of employment was revised to include all information required by 5 CFR 2638.303. The final change was implemented in October 2020.
Corrective action has been taken so this information will be incorporated moving forward.
HR services provided by HR LOB SSP and agency was not aware the SSP was not providing all notices

Question 17

Challenges associated with scheduling (packed daily agenda) and time zone coordination (new leader is stationed on opposite coast).
N/A
N/A
One Commission Member received their briefing 16 days after appointment. From March 2020, the Commission had one career staff person and was overwhelmed at the time.
N/A
The briefing was included as part of orientation which was schedule 16 days after swearing in.

Question 18

Scheduling conflicts.
One SGE was unable to complete ethics training within the 3-month deadline because he joined the Biden/Harris Presidential transition team and was barred by their Ethics Policy from speaking with the CFTC. Upon completion of his transition duties, he will complete ethics training.
Work and personal exigencies prevented some employees from completing the training within the 3-month window.
One employee's training was late by 2 days due to scheduling. Another was late by 1 month because the 90-day deadline overlapped with the onset of the pandemic and the related logistical delays.
Ethics is part of the New Employee Orientation Program and offered every quarter. Calendar Year 2020 was disrupted by COVID 19. The Agency's training department required additional time to migrate the training to a virtual setting.
Continue to work with HR on a more efficient tracking system.

New Employees receive link to training as part of New Employee orientation. DCAA TRAINEXT tracks training and Ethics Office sends reminders. Two employees were tardy in spite of reminders.
Some DCSA employees who were required to complete IET failed to do so within the 3-month requirement or have yet to receive the training because they were unable to access the agency's online ethics training (and other DoD websites) due to computer problems and issues with their newly issued DoD Common Access/PIV Cards. DCSA is continuing to its efforts to solve this and other connectivity issues. Additionally, there were a few employees who were terminated or left their DCSA positions within three months of their appointment. Beginning in October 2020, all new DCSA employees are required to attend a two-hour in-person initial ethics briefing presented by the DCSA Office of General Counsel as part of the agency's instructor-led New Employee Experience (NEX) onboarding program. All new employees are required to attend the NEX ethics briefing within two weeks of their entry on duty date.
During COVID all was done virtually, and HR changed a designation that caused the legal office to not know who the new employees were who had not yet taken the training. The problem has been corrected.
Two of the employees work in remote locations without Skype access to our training, so they were provided an alternate means and they completed interactive training 93 days after in-processing.
Despite regular reminders and follow up notices, approximately 6.3% of employees required to complete IET did so outside the 3-month window and an additional 8.9% did not complete the training. We will continue to follow up with those who did not complete the training.
Employees did not receive training because they failed to attend the virtual training offered. Staff follows up with the employee to remind them to take training.
Please see Additional Comments at the end of this Part
All employees who have not received IET as of today will receive this training within the next 60 days. The COVID pandemic was the main reason for late and missed 2020 initial entry training. Many offices that had previously performed this training in-person took time to adjust to virtual or on-line training methods. Contributing factors included untimely HR notice and HR coordination issues, personnel turnover, staffing issues, employees missing the first training session after their hire which put them outside of 90 day window, and seasonal employees on a leave without a pay status during the winter.
Extended telework due to the COVID-19 pandemic impacted some commands' IET programs including delays in new hire notifications as well as tracking timely training completion. Commands are aware of the delinquencies and are working on ensuring employees receive the required training.
Tracking lapse occurred during the transition of the Ethics Program Administrator.
One Defense Agency transitioned to a new system/process during which they lost track of over 180 new employees requiring training. They are currently remediating. Others are primarily due to issues relating to COVID and IT access.
Field Office. Due to COVID some employees did not have access to operating system, or were in remote areas. HQ. Two political appointees failed to attend training. Two employees on extended leave of absence.
Some employees left before the end of the calendar year but after the 90 day deadline. Some employees confused the IET requirement with the AET requirement. COVID-19 and

telework created many delays for onboarding employees, including delays related to obtaining computers and PIV cards, gaining access to the network and learning management system, complying with quarantine requirements, and recovering from illnesses. Other reasons include noncompliance with instructions, miscommunications between staff and the employee, delayed notification that new employees had onboarded, and extended leaves and deployments. SGEs were not permitted to conduct Department business until they completed it.

The majority of those who failed to complete initial ethics training in a timely manner were new employees of a component working frontline responsibilities. This was due in part to information technology being taken off line as well as a misunderstanding of the administering office that the training requirement was within 3 months rather than by the end of the year. Other issues arose from inaccurate records from human resources related to the timing of new employees' entrance on duty, as employee absence from the office due to the pandemic and other related causes, such as extended absence for medical or deployment reasons. Some late completions were due to a lapse in oversight. Each of these are being addressed to ensure greater compliance in future.

COVID safety measures required implementation of new training processes and created tracking and other administrative difficulties.

Reasons provided: Shared services not available and due to the COVID-19 Pandemic OSHA cancelled the CY 2020 training to the 1332 SGEs since the onsite reviews could not be conducted. Ten of the SGEs from the OSHA program received training before COVID-19 limitations.

The automated notification system used to identify and notify new employees of the requirement to complete Initial Ethics Orientation was not operational during the last 6 months of 2020. This issue has been resolved. There were technical difficulties with accessing the training module due to remote work because of COVID. Finally, The answer provided regarding the number of employees who received IET reflects employees who completed the Department's online IET course, but does not include employees who satisfied the IET requirement in different ways (such as through Foreign Service orientation or Civil Service orientation, which also include ethics components).

Many of the employees who have not received IET were appointed to seasonal, temporary, intermittent, field workers-only, or student trainee positions. Others are identified as being on unpaid leave, furlough, or suspension, and have limited access to office and IT equipment to complete training remotely due to the COVID-19 pandemic. In limited cases, employees were onboarded less than 90 days, in a non-pay status, or did not have access to government-issued equipment or the Department's training portal training. Ethics officials have taken several steps to improve compliance with IET requirements, including improved communication, providing alternate means to ensure timely completion of ethics training, and improving tracking.

Due to the pandemic, at one bureau, several employees were unable to access online training because they were not issued computers at another bureau, some employees had technical issues accessing training, and others were delayed despite reminders. At a third bureau, automated system designed by IT to assign new employees training worked well until a reassignment of IT duties caused miscommunication, and this process not to be reassigned to a new person in IT for several months. (The process has since been corrected.) All were provided ethics orientation materials.

<p>IET is assigned electronically, but some facilities opt to present it as part of the onboarding process at their local facilities. Because this local training does not get reliably entered into the electronic training records, these numbers may actually undercount the number of new employees who received IET, whether late or on time.</p>
<p>EPA did not convene many FACAs during 2020 so some SGEs did not need nor receive IET. For RGEs, some experienced delays in getting agency equipment during COVID had problems with the e-learning platform, including not finding or being assigned the IET in their onboarding training package, and not getting training completion accurately recorded or may not have been notified or reminded to take the training by their local DEOs. EPA Ethics determined that 78 of the employees identified as taking training beyond 3 months nevertheless did so within 14 days thereafter. The remaining 161 may not have been assigned the IET or took the annual training instead. We surmise that the 139 employees who did not take any ethics training during 2020 may not have been assigned the training or their local DEOs may not have communicated with them about the need. We rectified the problem by incorporating the IET as part of the overall EPA onboarding package instead of being assigned by a local DEO.</p>
<p>One employee completed IET within 5 months of her appointment date, another within 6 months. We lost sight of these employees during early COVID when EEOC transitioned to agency-wide teleworking. One employee completed IET within 3 months and 1 day. This employee mistook his due date. Two employees completed IET within 3 months and 3 days of their appointment dates. For these two employees, we had to create a new IET module after EEOC's Learning Management System, which contained its standard IET, was taken offline to ensure all training materials complied with Executive Order 13950 (09/22/2020), "Combating Race and Sex Stereotyping." This caused the two employees to miss the 3-month deadline.</p>
<p>N/A</p>
<p>An SGE who was a member of an FLRA Board was appointed in 2020. The Board, of which he was a member, did not meet at all in 2020. He received ethics training before the end of the year.</p>
<p>3 employees trained late due to administrative error.</p>
<p>Two were unable to attend our quarterly new entrant training due to work activity conflict</p>
<p>One employee is in a military leave without pay status. One employee was on maternity leave that delayed taking IET.</p>
<p>NARA transitioned to a new method of providing IET in 2020. Some employees who entered on duty between January 1 and March 14, 2020, did not complete the required training during this transition. All employees entering on duty after March 15th received both a live webinar training and information on accessing written materials.</p>
<p>Four employees were hired in CY 2020. Copies of Certificates of Completion for three of the four new employees were received shortly after their start date. A copy of the fourth employee's Certificate of completion could not be located although he did receive timely notice of the training requirement. When it became clear a Certificate of completion could not be located, the individual retook the initial ethics training. He has since also completed annual ethics training.</p>
<p>6 employees were assigned the training during the first week of employment with the Agency but did not complete the training within 90 days. 4 of these employees reported that their delay in completing the training was in part, a result of acclimating to mandatory telework</p>

and their new working environment due to COVID. All employees remedied this by completing the training as soon as our office inquired about the delay. To avoid similar issues in the future, we are fine-tuning our reporting process to identify those who are at risk of missing the 90-day deadline. The remaining 2 employees separated from the Agency within 90 days of their appointment.

When NSF moved to full-time telework in March, 2020, all training converted to on-line. Regardless of your status - supervisor, non-supervisor, rotator - there is a tremendous amount of training required to be completed by new employees. Most courses have a shorter length of time to complete - 30 rather than 90 days. "Due By" date determines the order the training is listed in the system. Therefore, the training that was due earlier took precedence in the system, and new employees took the training in order. The amount of training required, coupled with trying to learn a new job in a completely remote setting, had an effect on timely compliance with many of the requirements this past year. See addition comments for remaining explanation.

As a result of COVID-19, NSA made changes to its operating posture early in 2020 to protect its workforce and to support physical distancing in the workplace. These changes impacted the timely provision of IET to new employees as well as other aspects of NSA's ethics program (as explained in other comments). Ethics Officials in OGC did not fully return to the office until the end of July, and the Agency did not reconstitute until September. Thus, there was a period during which the availability of both ethics officials and new employees for IET was limited. Since returning to the office, ethics officials have worked to provide make-up IET for those requiring it. However, some new employees still remain out of the office due to their increased risk of severe complications from COVID-19 and have yet to receive IET.

Initial ethics training is a part of the new employee orientation training package. This package is administered by our training center. Two employees tried to take the training, but had technical difficulties in obtaining the certificate demonstrating completion. One employee had a record of the training, demonstrating completion within the three-month requirement. Another employee could not recall whether the training was completed and had no relevant records. Out of an abundance of caution, the second employee completed the initial ethics training once contacted by an ethics official, which is reflected in answer 18b.

All outstanding training requirements are being pursued through notifications to the individuals and their supervisors.

Due to the pandemic, many of OMB's new employees were onboarded remotely and did not obtain their laptops or access to OMB systems in a timely manner, which affected attendance within the 90-day timeframe. New employees and the OMB Ethics team also encountered difficulty using Skype to attend/present the training prior to the pandemic, OMB Ethics presented the training in person. In one instance, a new employee missed the 90-day timeframe and left OMB before receiving training. One public filer who was on extended medical leave of absence beginning very shortly after her arrival in 2019 and returned late in 2020 did not take new employee training.

Due to Covid restrictions, some employees have been on WSL, and have not had access to their email or our computer systems. One employee left prior to the 90 day deadline.

Those employees failed to attend the agency's required quarterly New Employee Onboarding (NEO) Phase II training. Employees have since received the training. Please note that all new PBGC employees are given the agency Ethics Handbook upon onboarding and may contact an ethics counselor for questions or guidance.

SBA Office Human Resources failed to assign some of the new employees an account in our HR system. The issue has been corrected.
Some scheduled trainings were postponed due to COVID changes and doing so pushed some employees sessions beyond the deadline. The 49 are scheduled to take the training in the next month.
Due to glitches in the learning management system, training was not assigned to the new employees and/or automated training notifications were not sent reminding employees of the requirement to complete the training. Also, see additional comments section.
n/a
Three employees were late receiving IET due to miscommunication between the human resources office and the ethics office regarding the employees' promotions.

Question 19

There was a breakdown in communication between HR and the DAEO's office when we went from live initial ethics training to computer-based interactive training, and, therefore, HR was unaware of the requirement.
The Director, Departmental Ethics Office (DEO) provides the required written confirmation to the DAEO.

Question 20

The Director did not complete the annual ethics training despite being given multiple reminders to complete an online training. All political appointees including the Director received an ethics briefing on July 2, 2020.
Pursuant to section 11(b)(2)(B) of the Inspector General Act of 1978, as amended, the Chairperson of CIGIE is elected from among the Inspector General members of CIGIE and, accordingly, receives his or her initial ethics and/or annual ethics training from his or her employing agency.
The head of the agency is the DAEO and is an appointed position and he did receive his ethics training upon appointment.

Question 21

One SGE was unable to complete training due to serious medical issues/extended hospitalization. In light of this, the DAEO provided an open-ended extension until the SGE able would be able to resume official duties and complete training.
Note 3 employees accounted for in 2019 retired in 2020 and one person changed jobs at AFRH. COVID-19 prevented in person training during 2020 and restrictions and required quarantines complicated matters.
One public filer left the agency prior to the dates scheduled for the annual ethics training. The other public filer was on leave during both sessions of the training, but completed a make-up training January 18, 2021. The "Other employee" was unable to attend either training session, but completed a make-up training January 16, 2021.
The 364 FACA SGE filers were not provided annual ethics training due to scheduling conflicts in the latter part of 2020. Additionally, there was turnover of senior staff just prior to the end of the year that created a lack of continuity in the Commission's ethics program. Corrective action will be taken to ensure that the regional programs office is provided guidance, training protocols, and materials to ensure that the FACA SGE filers are given

annual training for calendar year 2021. The Commission is working on improving its annual ethics training process.
Of the 397 employees who do not file financial disclosure forms but were required to take AET, one employee was on extended medical leave through the end of the calendar year.
The one public financial disclosure (OGE Form 278e) filer who did not attend annual training was on disability leave and continues to be on disability leave. Eleven confidential financial disclosure filers (OGE Form 450) had not completed training by the end of the calendar year. One of those eleven left the Bureau at the conclusion of the final pay period of 2020 on January 2, 2021. Another of those eleven employees separated in the first pay period of 2021, effective January 19, 2021. Two of those eleven have since completed training during the month of January. The remaining seven of the eleven filers have been and continue to be on maternity or other long term health-related leave. [See Additional Comments for Part 5 for continuation]
One OGE 450 filer did not receive notification of the annual training requirement and one OGE 450 filer did not complete the training by the end of 2020. We are following up with those 2 filers to complete the training.
19 Exceptions for deployment and long term sick leave.
Despite regular reminders and follow up notices, a small percentage of employees did not complete the training. We will continue to follow up with those who did not complete the training.
Some employees left the Department, were on extended leave or did not attend despite multiple emails.
Please see Additional Comments at the end of this Part
The COVID pandemic played a part. Ethics offices that had previously given this training in person had to adjust to on-line methods. Contributing factors include filers who departed the agency before the end of the year but were not removed from FDM, end-of-the-year new entrants, illness, deployments, and long-term leaves.
Extended telework due to the COVID-19 pandemic impacted some command's AET program including accessing electronic training and tracking completion. Commands are aware of the delinquencies and are working on ensuring employees complete the required training.
Of those not trained, most were deployed or on extended leave.
2 employees are non compliant. 3 employees are on Military leave. 1 employee on extended sick leave.
One filer on extended leave has since retired. Four employees (political appointees) were on detail outside of agency. We were told that they would provide certification of completion of training. We were unable to confirm certification that ethics training was completed. Eight employees on extended leave, and DAEO has followed up with management regarding three employees.
Some employees were transferred to another agency before the end of the year, others were on extended leave, others were activated for military service, some had access issues related to COVID-19 telework posture, and some were SGEs who did not participate in committee activity.
Several of these employees are on extended medical leave, suspended from duty, or retired as of end of year. Others have been referred to management for consideration of appropriate action to remedy non-compliance.

<p>HUD: Employees either completed the training after the 12/31/2020 deadline or did not self-certify training completion by the deadline. In an effort to obtain compliance, reminders of the requirement to take Annual Ethics Training were sent to employees and when necessary, non-compliance was brought to the attention of the DAEO and ADAEO to help achieve compliance. There is also a discrepancy because some employees left the agency before the deadline for completion and prior to completing their Annual Ethics Training. OIG: Technical issues resulted in a later than desired rollout date for online training tracking completion was also impacted by technical issues.</p>
<p>COVID safety measures required implementation of new training processes and created tracking and other administrative difficulties. Annual training was also affected by other COVID disruptions such as technology issues and administrative problems. Additionally, there was extended leave by employees subject to the training requirement, and some filers left before completing training.</p>
<p>Reasons provided: Employees on extended leave, employees on military leave, employees separated, employees died</p>
<p>There were technical difficulties with accessing the training module due to remote work because of COVID.</p>
<p>The discrepancies between the number of employees who were required to receive training and the number of employees who actually received training are attributable to employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status.</p>
<p>Nearly all of the employees that did not receive their required training were on extended medical or family leave, administrative leave, or military duty.</p>
<p>Employees on extended or admin leave employees left prior to completion technical issues</p>
<p>Executive Schedule I & II. Deputy Secretary left office before receiving 2020 annual ethics briefing. Those who did not receive training were unable to make one of the multiple scheduled or makeup training sessions sessions, or retired without taking annual ethics training.</p>
<p>PUBLIC FILERS: 2 public filers failed to complete annual training by 12/31/20, but nevertheless took the training in early 2021 (knowing it would not count for 2021). At EPA, annual ethics training is not required of all employees but rather only for those who file financial disclosure reports. Consequently, EPA's e-learning platform does not include ethics training on its menu of "mandatory training." Some employees failed to realize this and mistakenly concluded that they had fulfilled all of their training requirements. Some employees cited workload issues computer connectivity issues extended leave tracking completion errors and some newer DEOs may not have kept after employees. Nevertheless, many employees who failed to complete the 2020 annual training voluntarily did so in 2021, even knowing it would not count towards their 2021 training requirement. Those voluntary completions are not included in this report.</p>
<p>The single confidential filer who did not received annual ethics training has been on extended sick leave.</p>
<p>N/A</p>
<p>All employees required to receive annual ethics training received it timely with the exception of one employee who was on extended leave throughout the Fall and early Winter of 2020. This employee received the annual training as soon as the employee returned to duty within the first week of 2021.</p>

Eight employees who were required to complete annual training did not do so. Of the eight employees, seven employees were on extended medical leave and one employee was on military duty overseas.
Due to the COVID-19 pandemic and the associated mandatory telework, a public filer was unable to receive needed in-person assistance from FEC IT personnel to access and complete the training.
One PAS employee and three SES senior level filers left the Commission before the training. Also, some employees were on extended sick leave, military leave, maternity leave, retired and/or detailed to another agency.
One of the SES, public filers retired from federal service in November before the annual training occurred.
One employee was on extended medical leave. Others were detailed outside of the agency.
10 OGE Form 450 filers are on extended leave.
N/A
1 450 filer didn't complete annual training.
5 political employees who left the agency in January 2021 did not complete training in 2020. The other 4 Public filers completed training in Jan 2021. We are following up on the employees who missed training and some of the others were on extended sick leave, military leave, and extended personal leave.
2 OGE 450 filers did not complete annual training. One was on medical leave during the training period and one was unable to access the training, which was given in 2020 exclusively via webinars.
Two 450 filers are on administrative leave with no IT access. One 450 filer is on extended medical leave with no IT access. One 450 filer is on extended military leave. One 450 filer is in an AWOL status.
One confidential filer is away from the agency on long term sick leave. This filer will receive appropriate training upon their return.
2 OGE278 filers separated from the Agency and government service in January 2021 and did not complete the training prior to their departures.
2 filers were on extended medical leave and could not complete the training. One filer was supposed to retire in December but his retirement date was extended three months at the last minute. He did not complete the annual training by December 31, 2020, but completed it in January because his supervisor, who was notified, felt it important that all employees complete COI training.
The numbers reported above are percentages, rather than numeric counts of individuals who received training. Actual numbers are made available to cleared OGE personnel when required. Please also see Additional Comments for Part 5.
The NTSB requires all agency employees to receive live annual ethics training, with limited exceptions. Nine employees were unable to attend live ethics training, for reasons including medical leave of absence and conflicts with other official duties. Six of those employees received interactive training in 2020, and the remaining three received interactive training in 2021. As of January 14, 2021, all 413 employees have completed 2020 annual ethics training. Some discrepancy is due to employees being on annual or medical leave, or having separated from the agency before December 31, 2020. Any other outstanding training requirements are being pursued through notifications to the individuals and their supervisors.
One person was on a military leave and continues to be. One person was a medical leave.

<p>Prior to the pandemic, OMB Ethics presented the annual training in person. This year, due to the pandemic, the training had to be prepared, tested, and presented through OMB's virtual training systems, and was not available to employees until November 2020. Despite the delay, OMB leadership and OMB Ethics led an agency-wide push to complete the training within the shortened timeframe. Only two confidential filers who were on an extended leave of absence failed to take training in 2020, although one of them completed it upon his return in January 2021. One public filer who was on extended medical leave of absence beginning very shortly after her arrival in 2019 and returned late in 2020 did not take the 2020 annual training.</p>
<p>The Director did not complete the annual ethics training despite being given multiple reminders to complete an online training. All political appointees including the Director received an ethics briefing on July 2, 2020.</p>
<p>-</p>
<p>employees left USTR before 2020 training was offered</p>
<p>3 public filers were on leave in 2020 and made-up their ethics training live via WebEx in Jan. 2021. 1 public filer that was on maternity leave in 2020 will make-up her training during February 2021. 1 public filer stopped work in June 2020 and has been on extended leave since then. She will officially separate in 2021.</p>
<p>The two employees were both on extended leave and unable to complete the training.</p>
<p>c. One employee completed the training after 12/31/20</p>
<p>The employees were on extended sick, military or administrative leave.</p>
<p>We had two 278 filers out on extended leave. One was out for medical purposes and ended up leaving the agency before the end of the year. The other employee was on extended military leave and completed annual training January 2021 (for the 2020 year), when he returned from military leave.</p>
<p>See additional comments section.</p>
<p>Two 450 filers retired prior to the period offering annual ethics training. 1 450 was on an extended leave period during the training period and the filer did not return until early 2021.</p>
<p>One public filer not receiving annual ethics training to date was unavailable or unable to complete the training due to exceptional family member care needs exacerbated by the COVID-19 pandemic. There were eight confidential filers unavailable or otherwise unable to complete annual ethics training within the 2020 calendar year. One confidential filer was on, and continues to be on military deployment orders. To date, four of the eight confidential filers have completed their annual ethics training, and we are pressing the other four to complete the training.</p>
<p>Twenty-two postal 450 filers were sent several reminder emails to complete training but did not do so. The Ethics Office informed postal leadership of these employees' failure to take and record annual ethics training.</p>
<p>Former CEO Pack received initial ethics training but not annual ethics training. USAGM placed seven of its career SES on investigative leave starting in early August 2020 and they remained on leave throughout the 2020 calendar year. Acting CEO Chao brought them back in mid-February 2021. For this reason, 2020 annual ethics training is scheduled for late March 2021. Despite multiple requests from OGC, in 2020 our OCEO did not provide or permit HR to provide the Ethics Office with adequate information about names and status of its non-career staff for the Ethics Office to schedule or conduct annual training. Ninety-nine percent of USAGM's 450 filers participated in live ethics training via Teams. There are still</p>

six 450 filers who have not completed annual ethics training, including several out on extended sick leave and one whom the ADAEO deemed "exempt" from training due to extenuating circumstances.

Question 22

USADF Ethics Office has training for the agency's 20+ Country Program Offices, including specialized trainings for Country Partner Organizations (who receive funding via cooperative agreement grants) and Country Program Coordinators (Personal Service Contractors) to help them assess unique ethics issues they may face in African development. The Ethics Office had one new Partner in CY2020 and provided the organization with its Initial Ethics Training/Q&A via Zoom. USADF ethics training is highly encouraged for Washington D.C.-based contractors, and almost all of USADF contractors added the Annual Ethics Training for CY2020.

Ethics education required for non-federal employees of the agency.

Annual ethics training is required for all employees, including non-covered employees.

CORs (Contracting Officer's Representatives) received supplemental ethics training as part of COR training, and 1090 employees who do not file financial disclosure reports completed biennial non-filer ethics training.

The DAEO required all attorneys in the Office of General Counsel to complete AET.

The agency provided mandatory Hatch Act training for all agency employees, provided by Ana Galindo-Marrone, of the Office of Special Counsel.

At the recommendation of the DAEO, the Bureau Director required all Bureau employees who worked at the Bureau as of October 1, 2020 to attend annual ethics training. Additionally, while the DAEO did not mandate any additional requirements for the Bureau's ethics education program, the Bureau's Ethics Office did provide a training session specifically tailored for the Bureau's Office of Research to explain the role of the Ethics Office in implementing the Bureau's Independent Research Policy. Also, in recognition of the 2020 election season, the ADAEO hosted a number of voluntary sessions for employees to learn more about the Hatch Act's prohibitions on political activity in the workplace.

Agency ethics officials provide training for all Category Managers responsible for purchasing commissary product for resale.

The DAEO required all agency employees to attend live annual ethics training.

The DAEO established a requirement for annual continued education of all Army ethics counselors via OGE webinars or other applicable methods. Army leadership mandated Army-wide Political Activities Training (Hatch Act and Department of Defense policy) and Leader-Led Ethics Training for all agency leaders. Other Army officials mandated ethics training for senior official staffs, incoming commanders, government credit card holders, Inspector General personnel, and safety personnel.

Because of the DoD OIG oversight responsibilities, the Agency Head, with advice and counsel of the DAEO/GC, has determined it critical that all OIG employees receive annual ethics training.

Established Live, Leader Led, Values Based Annual Ethics Training as the primary methodology to be used.

The DAEO established ethics counselor training requirements for all ethics officials at the Department of Energy. Each ethics official must complete four hours of ethics training each

calendar year, whether it is through the Institute for Ethics in Government or another source that offers training relevant to providing ethics advice and counseling.
The DAEO holds quarterly training meetings required for all DEC's and EC's, and an annual day-long training workshop for all agency ethics officials. The DAEO has given the DEC's authority to require all employees in their components to complete AET. Many DEC's have done so. The DAEO did so for all components she served as DEC for. Due to COVID-19, the DAEO authorized the agency to provide live, real-time virtual AET for all political appointees instead of in-person training.
Many DOJ components require all employees to receive annual ethics training regardless of financial disclosure status. All DOJ attorneys must receive 4 hours of professionalism training of which 1 hour covers ethics. DEA hosts seminars for retiring employees which include ethics training on post-government employment ethics rules.
At DO/HQ: Non-mandatory seeking and post-employment briefing for all departing political employees at five bureaus, annual ethics training is mandatory for all employees, regardless of filing status.
All VA employees are required to have annual ethics training.
Agency head requires all EXIM employees to attend annual ethics training.
We required all FCC employees to complete ethics training.
Certain groups must receive annual ethics training regardless of their GS-levels and responsibilities (e.g., all staff who work in Commissioner offices). Managers throughout the FTC have also designated certain persons for mandatory annual ethics training based on the nature of their responsibilities, degree of independence, etc.
All GSA employees, including the covered employees above, were required to complete annual ethics training.
All IMLS Employees receive annual ethics training
The DAEO established live or virtual ethics training requirements for our SGEs as part of the IAF Board of Directors and Advisory Council annual meeting and for IAF's Personal Service Contractors. In addition, employees who are not required to file 450s or 278s also receive annual ethics training along with the rest of the agency.
The new DAEO required all employees to receive ethics training, live via TEAMS.
All employees who serve as evaluators for procurements are required to complete a training. In addition, starting in CY 2020 all agency employees were required to complete an annual refresher training course in a number of subjects critical to NARA's mission, including an ethics component. Finally, the Archivist's Management Team - approximately 20 senior officials - receives quarterly ethics briefings the content of these briefings is usually shared with all other 278 filers.
Annual ethics training was provided to all agency employees regardless of filing status.
It is our practice to send reminders that cover topics that are included in our required Annual Ethics Training to all Agency employees. This approach ensures continuity in our messaging concerning the Standards of Conduct and Criminal Conflict of Interest Statutes.
In coordination with Agency leadership, the DAEO is working to implement a plan for all Agency employees to receive ethics training once every five years. In the process of accomplishing this, the ethics team is developing a new ethics training intended to better serve the needs of the Agency. Rollout is expected in CY 2021.
We included Hatch Act training with our annual ethics training.
All OGE employees were required to attend annual ethics education sessions.

Paid interns are not required to file financial disclosure reports, but are required to take new employee and annual ethics training.
OSTP mandated ethics training for the entire OSTP staff and provided ethics training to all on-boarding and off-boarding staff members.
Overseas staff attending Overseas Staff Training (OST) are required to receive Ethics training focused on ethics issues they may encounter in an overseas environment. New personal services contractor staff at overseas posts are required to review Ethics materials upon entering on duty.
DAEO requires that employees that are non-filers receive live in-person ethics training (performed live via WebEx due to COVID in 2020).
Provided Integrity orientation training to all New Entrant 278 filers.
The Ethics Office extended mandatory annual training to the entire agency (including employees who were not required to file a financial disclosure form). The Ethics Office also trained all employees on the SEC's Supplemental Ethics Regulations, and provided specialized training on the Hatch Act to certain agency personnel in our Headquarters and Regional Offices.
We conduct live training for both New Hire training and Annual Ethics training. All SIGAR employee's received live training for both.
All TVA employees and staff augmentation contractors are required to take annual ethics training. Managed task contractors are not required but are strongly encouraged to take the training. In addition, TVA Supervisor/Managers and Officer/Executive-level employees are required to take an additional module as part of the annual online ethics training.
In addition to the financial disclosure filers that attended live ethics training during CY 2020, we also trained over 4,500 other non-filing employees.
In addition to public service is a public trust, conflicts of interest, impartiality, misuse of position, time, and property, gifts between employees, gifts from outside sources, outside activities, and seeking and post-employment, we also covered community service activities, endorsements, anti-nepotism, and the the Hatch Act.
DFC Ethics Training policy sets forth that all employees will be offered annual ethics training, however attendance will only be tracked for those who are required to take training.

Question 23

Assessed the content of ethics training instruction during ethics staff assistance visits, reviewed attorney outside practice of law requests to assess conflict of interest and representational violation risks, assessed risk of election year political activities and provided additional training, discussed common and emerging ethics risks with the Chief of Internal Review and Compliance and with the Chief of Management Employee Relations, created an ethics specific email mailbox, and reviewed internal investigations for trends.
Based on OGE guidance and the DAEO's own assessments of risks associated with the pandemic and mandatory telework, our office provided guidance covering a range of topics to include misuse of position and the Hatch Act.

<p>Considered ethics issues that could arise during the transition to telework and workplace changes due to the pandemic. We also provide ethics training directed specifically to Acquisition staff and other staff, primarily in the CIO's office, who work the most on high-dollar IT acquisitions. This training includes relatively more training on acquisition-specific topics like the Procurement Integrity Act than regular annual training.</p>
<p>Developed and scheduled leader-led values-based ethics training to coincide with the beginning of OGE 450 filing season. Periodic DAEO Grams to coincide directly with issues including federal elections, holiday functions and gift giving, and other seasonal "high risk" periods .</p>
<p>Discussed compliance program with Chief Risk Officer and senior management.</p>
<p>DoD and Agency Inspector General Reports that found ethical failures.</p>
<p>Ethics officials assessed risks to help inform the content of ethics education and communications.</p>
<p>Ethics staff meet regularly to discuss significant developments, trends, and issues that should be added to our annual ethics training, in addition to sending out periodic ethics announcements.</p>
<p>Hatch Act questions that arose due to Presidential Election, social media, social protests, telework, and the need for accelerated schedule for HLS programs and the acquisitions associated with them.</p>
<p>Identified risks and challenges associated with pandemic-related changes in work environment--e.g. full time telework for employees.</p>
<p>In light of the upcoming Presidential election and potential transition in 2021, the Bureau spent considerable time on the seeking/negotiating for non-federal employment rules, the post government employment restrictions, and the Hatch Act during annual training this past year. Additionally, as noted in response to question 22, the ADAEO hosted voluntary Hatch Act learning sessions to coincide with the 2020 election season.</p>
<p>In-house discussions on high priority issues.</p>
<p>Note that responses for this question differed among bureaus.</p>
<p>OIG annual audit during monthly training sessions for field ethics attorneys, solicited feedback on topics/issues encountered.</p>
<p>Regular discussion among ethics attorneys and paralegals to evaluate what issues to address.</p>
<p>Reviewed advice and questions from employees over the course of the year to look for emerging trends to incorporate into annual ethics training.</p>
<p>Reviewed advice for common issues.</p>
<p>The DAEO and ADAEO discussed the coming election year and reached out to OSC for Hatch Act guidance for SGEs.</p>
<p>The Department of the Navy's Business Operation Plan (BOP) includes a requirement to track the effectiveness of the ethics program, including ethics training.</p>
<p>The GC/DAEO meets weekly with the agency head. Current ethics issue are addressed during this meeting. The DAEO holds a bi-weekly meeting with the Ethics Program team to address programmatic and policy issues.</p>

We are a very small agency and the DAEO happens to be the general counsel as well. The DAEO is aware, often directly, about most agency actions and operations. So risk assessment about ethics and other issues is an ongoing process.
We talked and decided we wanted to add material regarding the Hatch Act because there was an upcoming election. With employee's all working from home, we wanted to address any questions before November.

Question 24

Consulted HR to determine and utilize the most effective and relevant training slides.
Some offices forwarded updated ethics training to directorate leaders and subordinate wing leaders. POCs often attend monthly HAF ethics briefs as well, monitor common issues, and push targeted training to address them.
Held discussions with Highly Qualified Expert Senior Mentor Filers on ethics areas about which they felt they needed more training.
The Department of the Navy's Business Operation Plan (BOP) includes a requirement to track the effectiveness of the ethics program, including training.
Reviewed training surveys provided by organizations responsible for training events in which the Ethics Program team participated.
Conducted survey of IG counsel services, including ethics advice provided. Also received feedback from employees following annual ethics training.
Held targeted ethics training sessions at the request of Senior agency leadership.
Evaluate feedback from training participants, obtain evaluation and recommendations for improved ethics training from supervisors.
Note that some bureaus did not evaluate effectiveness of their ethics education.
We collect information anecdotally: we received many emails from the learning community about their appreciation for the quality of the ethics training and counseling.
Employee feedback.
We actively evaluate and seek employee feedback and consider their comments, suggestions, criticism if any, and their complements.
Regularly review prior years' data from voting clickers to determine what topics are routinely difficult/misunderstood by employees.
DAEO discusses ethics training needs with agency managers/supervisors. Also during exit briefs, departing employees are asked to evaluate the effectiveness of the ethics training during their tenure. Employees are specifically asked to recommend changes that would assist IMLS employees to better carry out their ethics responsibilities.
Review of Federal Employee Viewpoint Survey (FEVS) agency-specific FEVS supplemental question use.
The Federal Credit Union Act requires the NCUA's board to have an independent audit performed as part of the GAO's government-wide financial audit. During this process, NCUA monitors the agency's annual ethics training compliance via an independent, external auditor.
Conducted survey to evaluate effectiveness of ethics program, including the resources published to NEH staff as part of it.
Due to workforce teleworking and COVID-19 safety measures, the agency restructured annual training for internet access and virtual training sessions on platforms such as Blackboard, Webex and conference calls.

Solicited feedback from field employees who rotated through our office on detail. This feedback was critical to the development of new training resources that we created during CY 2020.
NSF conducted a self- assessment to evaluate the effectiveness of ethics education of its Conflicts Officials by distributing a survey to evaluate whether the training and communications they received have supported them in managing ethics risk. Survey results overwhelmingly indicated that, as a result of the OGC Ethics Team training, the COI Officials became better aware of their ethical responsibilities. The usefulness of various methods of education were also evaluated. Individual advice from members of the OGC Ethics Team to the COI officials rated the highest for effectiveness. Survey results also indicated the desire to update the COI Officials SharePoint site to increase user friendliness.
We inform the training content by current events, eg, in 2020, we provided additional training sessions and informational materials addressing the Hatch Act.
Reviewed and updated initial and annual ethics training to ensure all required elements are covered
Informally received feedback from employees about the content, tone and relevance of the education sessions noted increase in the number and type of questions received post-training.
Our ethics team regularly discusses questions received during ethics training to identify patterns and improve training.
Held meetings with ethics staff to discuss increased activity after training presentations and communications.
NA
TVA tracks the number of “clicks” associated the monthly ethics articles published on the agency’s intranet site.
Noted the increased questions and requests for advice following training sessions as well as employee feedback following sessions.

Part 5 Comments

USADF ADAEO (preparer of this report) is not included in Question 21, as the lead and facilitator of USADF's annual ethics training.
Question 15: Because the Access Board is a micro-agency, written confirmation to DAEO not required. Nonetheless, the DAEO's practice is to still get such written confirmation.
Q21: Please note that in the 2019 Questionnaire response, the Q21 c. response should correctly read 0. The agency had 0 Confidential Financial Disclosure filers.
Question 15 - the office responsible for issuing ethics notices to prospective employees has complied with the 5 CFR 2638.303 obligation. The responsible office did not send written confirmation to the DAEO's office until after 15 January. Question 18 - answer is classified. Question 21 - answer is classified.
Supplemental narrative response to Q. 21: Six non-financial disclosure filers had not completed training by the end of the calendar year. Two of those six have since completed training during the month of January. One of those six has been and remains on active duty status with their reserve unit. The remaining three have been and remain on maternity or some other long term health-related leave.
16: Due to the pandemic, the ethics office did not receive copies of two offer letters however, agency staff reports that these records are in paper format located at our offices. 21: The number of employees listed requiring annual training includes both agency employees and

detailees assigned to the agency who file financial disclosure reports with the agency. The number does not include detailees assigned to the agency who filed financial disclosure reports with their detailing agency. Additionally, the number does not include employees who attended annual training but also received IET as reflected in response to 18.

N/A

#18: In-person IET is a part of the Agency's mandatory orientation for all new employees. 10 U.S. Code § 424 prohibits the disclosure of organizational and personnel information for specified intelligence agencies. DIA is one of the agencies listed.

Question 22 - As a supplemental Ethics training resource, USDA's DAEO updated the USDA Ethics App (available to the public for free by searching "USDA Ethics" on any Apple or Android smartphone's app store). USDA employees were informed that the updated USDA Ethics App now contains more Ethics Videos, electronic Ethics One-Pagers, and a new Ethics "Test Your Knowledge" Long-Distance Learning Game which traces the journey of a Federal employee from first day in Federal Service through retirement and all the various ethics issues that can arise at each stage. The USDA Office of Ethics also placed a new illustrated video, available to all employees and the public, on YouTube on compliance with the Hatch Act. This new video is titled: "The Hatch Act Illustrated and Explained" and was posted in February, 2020.

Q21: There is a fairly steep increase in the number of confidential financial disclosure filers that received annual ethics training this year. We believe that the number provided last year was artificially low, and would have been more consistent with the current numbers. We realized this year that not all offices rely on FDM to track their annual filers' training, and it was assumed that they did, so we relied on FDM's numbers last year. This year, as we now understand that is not the case, we have received the numbers throughout the Air Force, and believe that this is the most accurate count. Q18 How many employees, including SGEs, were required to receive Initial Ethics Training (IET) by December 31, 2020 (5 C.F.R. 2638.304)? Include employees who were excluded, under 5 C.F.R. 2638.304(a)(2), from the requirement to receive the interactive portion of the IET. (If applicable, please explain why some employees received IET beyond the 3-month requirement, or have yet to receive IET): -Lack of communication between HR offices and the legal offices that provide the training. -In the case of some employees, problems with email communications were the cause of their receiving the training beyond the three month requirement. All four eventually received training. -There were new/inexperienced ethics counselors who inadvertently overlooked the requirement. -Some offices perform the training quarterly, and there was an incident where the training had to be delayed one quarter, and some new employees went beyond the 90 day deadline. -Delays due to transitions from live training to virtual due to COVID-19. -Due to COVID-19 access restrictions on several installations/the move to teleworking for most employees, some new employees were not identified in a timely manner as not having received the training within three months. Others were unable to access the training online during the initial three months due to challenges with/availability of internet service from home. -In some cases, individuals were deployed shortly after being hired, and were not available for training until after the initial three months of employment. -Some employees departed the Air Force before three months had lapsed. -In some cases, employees were non-responsive to requests to complete training. -Some offices postponed trainings in the spring due to COVID-19, believing that the restrictions would be short-lived. Once they realized that was not the case, they developed a virtual training. -Some offices have refused to count the

training as completed unless the employee produces a certificate, however, there are problems with the current computer-based programs, and a certificate is not always generated. Moreover, although an employee may have been trained within 90 days, if they did not turn in the certificate before the 90 days was up, they were not counted as timely trained. -There was confusion as to whether onboarding employees who were already DoD employees needed to be trained again. -Due to the pandemic, a number of new hires did not have the requisite computer access to complete the training within 90 days. -Some new hires were sent on temporary duty to a training academy, and were delayed beyond the 90 days due to travel restrictions. -In 2020 there were transitions from live to computer-based interactive training. HR offices did not understand their obligation to notify new employees of their training obligation, so a substantial amount went untrained. However, those individuals are being contacted, and they will be trained ASAP. Q21 If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: -Some filers did not receive training due to significant illness, deployment, inability to access the materials due to technological difficulties. -Some filers ignored repeated requests for completion, or, despite making contact, would never follow through on promises to complete the training. -Some filers left the position (i.e., moved assignments, deployed, separated, retired) before the end of the year, without completing the training, and therefore, they are unaccounted for in the total trained. -There were a number of instances where it was suspected that the training was completed, but the employees could not be reached in time for this reporting to confirm, so they were counted as having not completed the training. -Due to the pandemic, there were a number of filers who had unreliable technological capabilities that impeded their ability to timely train. -There is an issue with 450 filers not understanding that there is no connection between the computer-based training system and FDM, which some offices use to track training. Those individuals tend to ignore requests for reporting completion, because they believe that the ethics counselors should be able to see it. The emails sent out have emphasized that there is no connection, and we do rely on them self-reporting, but there are a large number of filers who don't understand or appreciate that fact. -There were filers who were assigned a 450 report in December, but did not actually file in 2020, but they populate as requiring training in 2020 anyway.

Question 16 did not permit me to respond that all of the written offers of employment for positions covered by the Standards of Conduct included the information required by 5 C.F.R. 2638.303.

Q.21-In AEQ for CY2019 the Navy reported 70 employees received AET in accordance with 5 CFR 2638.307(a). This reporting was in error as the Secretary of the Navy has not established any additional training requirements beyond those in 5 CFR 2638.303-308.

#17. The one PAS position in DoD OIG has been vacant since 2015. The EPA IG is currently serving as Acting IG for DoD since April 6, 2020.

Q19 Most IET in DoD is developed and/or delivered under direction of ethics counsel. Those not providing the training indicated that they received the required confirmation. Q23 & 24 – One or more of these methods were utilized by most DoD DAEO Agency organizations/DDAEOs.

Q21: In past years we have included people in line d. who were not required by regulation or agency head to complete AET, but instead who were required by their respective DEC's. We have omitted those employees from this line, but we had at least 26,400 additional employees complete AET in 2020.

Question #22: No, the DAEO did not establish additional requirements for the agency's ethics education program, the Agency head did.
#16 - Standard templates for all offer letters includes the required language. The Ethics Office has not reviewed every offer letter issued in 2020. #21c - The data for Confidential Filers includes individuals who left a filing position after submitting an annual report. Typically, there are several hundred OGE-450 filers who leave the Department, change positions, or change duties by the end of any given year and are no longer in a filing position and therefore not required to complete annual ethics training.
Question 21: Additionally, certain DOI bureaus and offices are in the practice of training additional employees beyond the AET requirements. As a result, approximately 3,801 DOI employees received AET who were not covered employees or otherwise required by regulation or agency directive. Question 22: Please note that the DAEO collaborated with the DOI's Office of Human Capital to issue an updated Department-wide personnel bulletin establishing procedures for notifying new supervisors and prospective employees of ethics commitments and responsibilities.
Q16: At one bureau, some of the required ethics language was initially missing due to administrative error, but HR was notified and the error was swiftly corrected.
22. The Office of General Counsel amended its employee handbook to increase interaction when an OGC employee wants to engage in the compensated outside practice of law (not pro bono). An agency supplemental regulation is being circulated for internal agency concurrence process.
#21: The Agency presented five virtual sessions of live interactive mandatory annual ethics training to all employees. Employees were encourage to participate via a "chat box" and were able to submit questions in real time. Even with the challenges of 100% remote work due to COVID, the agency places a premium on live versus on-line training. In CY19, agency reported no 'other employees' in 21(d) but should have reported approximately 98 to be consistent with current year report.
N/A
N/A
Question 21 - We provided interactive training to 887 employees who were not required to receive annual ethics training.
#18 - Represents IMLS peer reviewers for 2020. Each year all peer reviewers must re-certify and if selected receive initial ethics training and complete a conflicts of interest statement. The increase in the number of peer-reviewers since 2019 reflects that in 2020, IMLS processed an additional cycle of grants pursuant to the government CARES Act.
Q. 19. Notification achieved through electronic systems. Beginning October 1, 2020, all offices providing initial ethics training reported to the DAEO. Q. 21. All the certified alternate filers were required to complete ethics training. In addition to annual ethics training provided to regular OGE 450 filers, NASA administers ethics training to peer reviewers each time the reviewer participates on a panel. In CY20, there were 1,776 instances of training provided to peer reviewers. This includes instances of individuals being trained more than once because they participated in more than one peer review panel, or because they additionally filed a regular OGE 450. Q. 22. Some offices required ethics training for all their personnel, which was supported by the DAEO. One NASA center required training for all their personnel. Q. 23 ethics education in response to risk assessment included Hatch Act questions that arose due to

<p>Presidential Election, social media, social protests, telework, and the need for accelerated schedule for Human Landing System programs and the acquisitions associated with them.</p>
<p>Question 18--Beginning in mid-March, all new employees received live briefing through webinar. Employees were also provided with access to written materials and supplemental information.</p>
<p>Please note that for question 18, the final tally is made up of the following: FT employees required to receive the IET = 14 * Arts Advisory FACA Committee = 658 * FACIE FACA committee = 6 * National Council on the Arts - there were no new members added in CY 2020, so there was no IET necessary * Members of these committees are classified as SGEs</p>
<p>Question #17- Data not included/is classified. Note: All new agency leaders received training within 15 days of appointment Question #18- Data not included/is classified. Note: All new employees received training within 30 days of onboarding Question #21- Data not included/is classified. Note: Standards of Conduct training is required mandatory annual training for all employees per NGA policy.</p>
<p>21d. NLRB Supervisors and Managers who are not financial disclosure filers are directed by leadership to complete the online version of the Annual Ethics Training by January 31st of each year. 22. We provide a customized onboarding ethics briefings for law students that are part of our summer intern program. Additionally, we provide PAS onboarding training to all PAS and their front office staff.</p>
<p>#18 continued: Once we realized that IEC was not being completed right away because of the 90-day deadline, we worked with LearnNSF to temporarily shorten the due date to 30 days to ensure the training was higher in the new employee's training queue. For 2021, we have a lot of "lessons learned" and are working to implement changes and provide guidance that will mitigate many of our remote work challenges and ensure all of our employees are better prepared to timely complete all of their requirements.</p>
<p>Question 21: NSA typically initiates its annual ethics training program early in the calendar year (CY). As a result of NSA's reduced workplace staffing, there were delays in the execution of the Agency's overall CY 2020 training program, just like there were for IET. As noted in the comment to Question 18, there was a substantial period during which the availability of both ethics officials and NSA personnel was limited. After returning to the office, ethics officials worked to ensure annual ethics training was received by those who required it. Of note, some new employees still remain out of the office due to their increased risk of severe complications from COVID-19. Finally, NSA's practice is for an organization external to the OGC ethics office to track compliance with all required annual training via a corporate tool, including but not limited to annual ethics training. That office encountered difficulties when it transitioned to a new system in September of 2020, which resulted in an inability to generate reports listing delinquent individuals. This lack of reports affected the ability to proactively take steps to remedy any delinquencies (e.g., escalating a failure to complete training up an employee's management chain). The ethics team is working with the responsible office to resolve these IT issues and does not anticipate a repeat problem in CY 2021.</p>
<p>Question 18: We require everyone who serves as an employee to receive initial ethics training. We meet with employees during their orientation to discuss initial ethics training, financial disclosure, annual ethics training, and the advice program. Question 24: We continue to assess our training needs. As part of our efforts in 2021, we will continue discussions with agency leaders and employees about developing targeted training to cover any areas that may benefit from additional education. General comment: We offered three additional trainings in 2020 on</p>

public and confidential financial disclosure filing and the Hatch Act. We also use the internal web portal to post information about emerging issues, including ethics during the pandemic, the Hatch Act, and financial disclosure reporting.
The difference between the numbers disclosed for employees taking training and employees filing financial disclosure reports occurs because the training data does not include employees that joined OMB on detail from elsewhere in the U.S. Government. Detailees to OMB are required to either provide a financial disclosure report from another agency or complete one at OMB.
The response to #21c is higher than in our 2019 questionnaire because we asked some of our incoming staff to file 450 forms.
#21 - The Office of the Vice President requires all employees to participate in annual ethics training. In addition, the Office of the Vice President provides initial and annual ethics training to detailees and assigned personnel from other agencies.
Question 21.d - per policy of DAEO - 17 employees that are non-filers received live WebEx ethics training.
None
During the pandemic-related telework period, the Ethics Office began providing voluntary “virtual coffee break” sessions twice a month, which covered specific items of ethics interest such as conflicts of interests regarding trusts, rules on accepting gifts, Hatch Act, seeking & post-employment restrictions, and fundraising. The format was generally a 20-25 minute presentation, followed by a short Q&A session.
18: We have all employee's receive live New Entrant training, regardless of their position or filing status.
Question 21: As of January 1, 2020, if an employee does not timely complete ethics training, network access is disabled. Access is reinstated only if training is completed. Information Technology (IT) is responsible for disabling access based upon reports generated by TVA's Learning Manager System (LMS). In September 2020, LMS was upgraded and IT underwent staffing changes. Following the upgrade, LMS did not generate reports to inform IT of accounts that were due to be disabled, and because of staffing changes, IT was unaware of the need to disable accounts. As a result, from September 6, 2020 to December 31, 2020, no employee had their network access disabled due to overdue training. In addition, the number of employees in delinquent status may be overstated because LMS has not consistently recorded employees' completion of training. Remediation efforts were begun immediately and starting February 1, 2021, IT will resume disabling network access for employees who do not timely complete training.
n/a
N/A
24. Although the DAEO did not seek evaluations of training session, several employees stated that the training was very good.

Question 25

N/A because we are so small
N/A because we are so small
Supplemental rules
Hatch Act
N/A because we are so small

Review auditor Independence and Threats to Independence under Generally Accepted Government Auditing Standards. This analysis mirrors the Appearance of Conflict of Interest, but is not dependent upon the OGE 450, because applies to all auditors, not only those auditors required to file. In addition, the Independence standard examines the appearance of bias in performing audit services, and is therefore specific to audit services.
Telework and pandemic related questions, including Hatch Act questions.

Question 27

The CIA does not provide copies of waivers because the substance of those waivers is classified and/or the information is protected by Section 6 of the CIA Act of 1949. The substance of all waivers received prior coordination with OGE before approval.
For one component, waivers are sent to OGE on a quarterly basis, thus the number of waivers sent in FY20 includes those from Q4 of FY19 and Q1 – Q3 of 2020.
These waivers were granted to faculty of the U.S. Merchant Marine Academy (USMMA) who wrote textbooks.
OGE was consulted on one waiver that was not issued because employee left.

Part 6 Comments

N/A
Q25. The frequency of ethics questions asked on these topics does not necessarily reflect the relative seriousness of ethics questions employees ask. Q26. There may be some additional statements that were submitted in hard copy, are stored in hard copy, and cannot be counted at this time due to COVID restrictions on physical access to those files.
27. The 208(b)(1) waivers were for VA Researchers.
N/A
N/A
N/A
Regarding question 25, item 2: the most common question involved questions about acting in an official vs. personal capacity, due to new requirements and asks of employees during the pandemic.
#26 - STOCK Act number reflects number of employees filing notice (some had several recusals listed). The Office of the Vice President requires all employees to file post government employment negotiation recusals although not required under the STOCK Act.
N/A
None
NA
N/A
n/a
N/A

Question 28 NA

No new appointments were made. In any event, the DAEO is involved in all hiring and promotions (as a member of the agency's senior leadership team), so the DAEO is always aware of when covered positions are filled without prompting by other staff.

Besides everyone becoming immediately aware of new hires and appointments (ours is a very small agency), the DAEO is also the person that coordinates with Department of the Interior for HR processing matters including hiring, on boarding, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date.
USADF had no public filing position appointments in CY2020.
No such new appointments occurred in 2020.
No appointments made during 2020.
Did not hire any staff in 2020 that were required to file public financial disclosures.
Because the Access Board is a micro-agency and does not have an in-house HR office, it is the General Counsel (acting in his/her capacity as DAEO) who determines which positions or duties have financial disclosure obligations and the type of disclosure required (i.e., confidential vs. public). Moreover, because we are a micro-agency, there is generally no need for HR staff to formally notify the DAEO or other agency ethics officers about new appointments. Our agency is small enough (i.e., about 30 employees) that all staff know when a new employees comes on board. In any event, it is standard agency practice for the supervisor of a new employee to send an agency-wide introductory email to all employees before he or she starts work, or, at the latest, upon his or her first day in the office -- either of which is well in advance of the 15-day maximum notice period.
USARC had no appointments
Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No new appointees.
The CSB is a small agency of 32 employees, currently. During the course of the last year, there were two new appointments to these positions. The HR office generally informs all staff when there will be any new appointment. The DAEO learned of the new appointments from these announcements.
CFA dos not have a Human Resources Office
We have one employee the PAS (Chairman) that is required to file financial disclosure. The one position was notified of his annual disclosure and it was completed.
We had no new appointments in 2020
Public and confidential financial disclosure filer positions are determined by the Office of Ethics according to title and grade IAW Agency policy. The Office of Human Capital does notify the agency ethics officials of all new hires within 15 days.
No relevant appointments made in 2020.
There were no appointments.
JUSFC is a nano agency with four FTEs. There is no internal HR provider. The DAEO is directly aware of every new hire.
The only such positions are the three Commissioners (PASs), for which prior notice and vetting requests come from the White House, the Executive Director and the DAEO.
No appointments made to public filer positions in 2020.
The DAEO is involved in the hiring process, so no notice from the external HRO would be necessary.
There were no public filers appointed during CY 2020.
No new appointees in 2020
No new appointments for Public filers in 2020
No public filers were appointed.

No new appointments to public filing positions were made in 2020.
No new employees
No appointments where made.
N/A because we are so small
The Board had no appointments in 2020 that changed an employee filing status. There were three promotions to new supervisory positions. Two were already supervisors, who remained 450 filers, and one promoted to supervisor, but remained a non-filer. All were provided supervisor ethics notices.
We had no new appointments requiring filing public financial disclosures in 2020. We just had our existing 6 filers from 2019.
GSA CABS does not make any recommendations or notifications of ethics related issues or need/requirement to file the 450 or 278. We had one new hire but GSA CABS does not provide any training or intro to ethics as part of their onboarding.
The Ethics Office pulls a report from the Human Resources database every two weeks.
No new appointments were made. In any event, the DAEO is involved in all hiring and promotions (as a member of the agency's senior leadership team), so the DAEO is always aware of when covered positions are filled without prompting by other staff.
Besides everyone becoming immediately aware of new hires and appointments (ours is a very small agency), the DAEO is also the person that coordinates with Department of the Interior for HR processing matters including hiring, on boarding, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date.
No such new appointments occurred in 2020.
No appointments made during 2020.
Did not hire any staff in 2020 that were required to file confidential financial disclosures.
Same response as portion of Question #28(a) above pertaining to confidential filers.
USARC had no appointments
Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant appointments.
No new appointees.
The CSB is a small agency of 32 employees, currently. During the course of the last year, there were not a significant number of appointments to these positions.
CFA dos not have a Human Resources Office
no new confidential filers during the reporting period.
This decision is made by the supervisor in accordance with the 2016 Confidential Filers Job Aid. Due to reorganizations and reassignments, the list of positions that actually file OGE 450s is malleable. All DISA Contracting Officer representatives are required to file 450s, other positions are at supervisory discretion.
Small agency with no confidential filers.
We had no new appointments in 2020
Public and confidential financial disclosure filer positions are determined by the Office of Ethics according to title and grade IAW Agency policy. The Office of Human Capital does notify the agency ethics officials of all new hires within 15 days.
No such appointments.
No confidential filers.
No relevant appointments made in 2020.

We have no confidential filers
There are no confidential filers.
JUSFC is a nano agency with four FTEs. There is no internal HR provider. The DAEO is directly aware of every new hire.
In an office of 13 employees no such notice is necessary. The DEAO is aware of all such appointments without such notice.
The DAEO is involved in the hiring process, so no notice from the external HRO would be necessary.
No new appointees in 2020
No confidential filers
No new employees
No appointments were made.
N/A because we are so small
No new appointments of Confidential Filers in 2020.
Our appointments are announced by the White House. The White House no longer has new appointments complete disclosures and the onus is on the agency to identify if there is a conflict AFTER the appointment has already been made. This is a change from previous administrations.
The Ethics Office pulls a report from the Human Resources database every two weeks.

Question 28 Some or Never

Please see Additional Comments at the end of this Part
All public filers and confidential appointments were ID'd to the DAEO by other means.
The agency is very small and it is widely known what appointments to public financial disclosure filing positions are made. I know, The HRO is required to provide the info but she doesn't.
The DAEO and Human Resources division work together to identify new employees and their public and confidential financial disclosure filing statuses as applicable.
HR notified the Ethics Office of the appointment of all career FTEs. The Ethics Office receives this information from HR on a biweekly basis. However, HR was not permitted to notify the Ethics Office of the appointment of most non-career filers, as the OCEO deemed this "confidential personnel information."
Please see Additional Comments at the end of this Part
Individual HR office reluctance or ignorance of OGE/DoD/Army directive to provide this information to the relevant ethics offices.
The Department of the Navy has a decentralized ethics program and commands establish different procedures for identifying new entrant OGE 450 filers that meet the needs of their organization. For example, at some commands, the ethics counselors are notified of new entrants through the check-in process vice directly from Human Resources.
The confidential financial disclosure program in DOJ is decentralized. HR is not necessarily the primary source of information to ethics officials as to confidential filers. HR does not track or implement confidential financial disclosure, or collect reports.
EPA is still working on incorporating this notification into our standard practice.
The Peace Corps Ethics Program was notified with lists of new employees and monthly staffing reports but not always within the 15-day deadline for staff moving internally into filing positions.

Notifications of onboarding active duty military personnel for fills of covered 450 positions must go through different offices, so notices and communications are not streamlined to ensure covered active duty positions filled are received by the ethics program on all occasions. Program is addressing this by periodic queries to the military personnel offices for onboarding lists.

Notification of local hires by the 50+ field offices around the world have not always been relayed to the ethics office. The Agency is in the process of changing its processes to remedy this.

Question 29 NA

No new terminations occurred. In any event, the DAEO (as a member of the agency's senior leadership team) is always aware of when covered positions terminate without prompting by other staff.

Besides everyone becoming immediately aware of new hires and appointments (ours is a very small agency), the DAEO is also the person that coordinates with Department of the Interior for HR processing matters including hiring, on boarding, and terminations. So the DAEO is always aware of new hires and appointees well before their start date or end date. And post-employment briefings are specifically part of our termination procedures.

USADF had no public filing position terminations in CY2020.

No such terminations occurred in 2020.

No terminations during 2020.

No employees departed the agency in 2020.

For the reasons noted in responses to Question #28 (above), agency ethics officers (both DAEO and ADAEOs) are personally aware of all staff departures, so no notifications required by contracted servicing personnel office. (Note: The Access Board only has about 28 full-time employees.)

USARC had no terminations

Due to the structure, independence, and small size of the ASBCA, the DAEO and ADAEO are the first to know about relevant terminations.

No terminations.

The CSB is a small agency of 32 employees with only a few public filers. The DAEO was typically aware of the upcoming departures at the same time as the Human Resources office. As to PAS filers, the DAEO was aware of the end of the term for each Member.

CFA does not have a Human Resources Office

There is only one position (the DAEO) required to file disclosure. No termination in 2020.

We had no terminations in 2020

No terminations in 2020.

No terminations in 2020

No relevant terminations in 2020.

We have no such positions

There were no terminations.

JUSFC is a nano agency with four FTEs. There is no internal HR provider. The DAEO is directly aware of every termination or separating from service.

In an office of 13 employees no such notice is necessary. The DEAO is aware of all retirements or other such terminations without notice.

The DAEO would be involved in the termination process, so no notice from the external HRO would be necessary.
No public filer positions were vacated during CY 2020.
The Commission's human resources was handled by a different federal agency, and the other federal agency was not required to notify the commission.
No terminations
No terminations.
There were no terminations from such positions in 2020.
No terminations were made.
N/A because we are so small
There were no terminations of public financial disclosure filers in 2020.
We had no public filers terminate in 2020.
GSA CABS does not know anything about who at our Agency is a non-filer, 450 filer or a 278 filer. The DAEO would track this independently of the HR office (GSA CABS).
The Ethics Office pulls a report from the Human Resources database every two weeks. We also receive announcements of the appointment of new officers.;N/A

Question 29 Some or Never

Please see Additional Comments at the end of this Part
Ethics officials most often have knowledge of these departures beforehand, or learn of terminations from filers themselves when they seek ethics advice on seeking employment or they are briefed on post-government employment restrictions. Some components request enhanced HR communication on this.
During the first three quarters of CY 2020, timely notice was not given. This error was corrected by the fourth quarter, and timely notice has been given in all cases since then, and has continued into CY 2021.
In 2020 the acting DAEO terminated from her public financial disclosure filing position when the new DAEO started. For this reason OGC was already aware of the termination and did not need our equivalent of the human resource office to notify the DAEO.
The Peace Corps Ethics Program was not consistently notified by HR within the 15-day deadline for terminations of public financial disclosure filing positions.
All public filers terminations were ID'd to the DAEO by other means.
The agency is very small and it is widely known what appointments to public and confidential financial disclosure filing positions are made. I know, The HRO is required to provide the info but she doesn't.
The DAEO and Human Resources division work together to identify employees who are required to file a termination report.

Question 31

FDM
internally developed e-filing system for confidential financial disclosure reports
CIA's e-filing system
FDOnline
FDOnline

Ethics Management and Tracking System.
FDOOnline
FDOOnline
The agency used the FDOOnline system for 450 report filing.
Financial Disclosure Management System
US Army Financial Disclosure Management (FDM)
The U.S. Army's Financial Disclosure Management (FDM) system.
DoD Financial Disclosure Management
DoD Financial Disclosure Management (FDM) system for all filers except the DAEO and SES/HQEs that files in Integrity.
Financial Disclosure Management (FDM) System
Financial Disclosure Management System (FDM) run by the Army.
Financial Disclosure Management (FDM) System
FDOOnline
Financial Disclosure Management System (FDM).
Financial Disclosure Management (FDM)
Department of Defense-Department of the Army Financial Disclosure Management System.
Financial Disclosure Management (FDM)
Financial Disclosure Management (FDM) system
1. Electronic Financial Disclosure System (EFDS) 2. NIH: NIH Enterprise Ethics System (NEES) 3. CDC: Ethics Program Activity Tracking System (EPATS) and 4. CMS: CATS
FDOOnline, Army's FDM, and CBP's HRBE OGE 450 e-filing systems.
FDOOnline
BOP: FDOOnline ATF: SharePoint USMS: e-filing system for OGE Form 450s.
The Financial Disclosure Management System (FDM) OGE-450, confidential Financial Disclosure Forms.
FDOOnline (for confidential financial disclosure reports)
FDOOnline
Internally developed systems at DO/HQ + 3 bureaus (OGE 450 filing via ethics DB Disclosure (Salesforce appl.) Ethics Management System e-filing system created in SharePoint.)
Army Financial Data Management system (FDM)
EPA Business Application Platform
FDOOnline (Intelliworx)
SharePoint for OGE 450 and Confidential Conflicts of Interest forms
SharePoint for Confidential Conflicts of Interest forms
Financial Holdings and Disclosures (FHD) (SharePoint based system for OGE 450filing)
FDIC's National Employee Ethics Tracking System (NEETS II) for FDIC supplemental financial disclosure reports was used for employees until October 2020 (the FDIC officially retired the system in November 2020). Beginning in October 2020, FDIC began using FDOOnline for all FDIC supplemental financial disclosure reports. So, as of October 2020 FDOOnline was are only financial disclosure system for both OGE Form 450 reports and FDIC supplemental financial disclosure reports.
Intelliworx/FDOOnline
We save Forms 450 on our internal computer systems.
FDOOnline Filing System

The Agency created an electronic OGE Form 450 system.
FDOonline electronic filing system
Ethics Program Tracking System (EPTS).
FDM
FDOonline.
NGA uses Integrity for public financial disclosures and FDM for confidential financial disclosures
FDOonline
NSF eFile
NSA's Financial Disclosure Reporting System (FDRS)
Ethics Gateway
A confidential financial disclosure filing system that our IT built.
Army FDM
OMB uses a SharePoint based system developed internally for completion, review and storage of 450 filings.
Those employees that were not required to have their forms submitted to OGE were allowed to use the OGE 278e and submit to the DAEO.
CIA's electronic financial disclosure system
Senate staff who are required to file do so using Senate FD
FDOonline for OGE Form 450 filings.
Confidential Financial Disclosure System (CFDS)
FDOonline
FDOonline
ARMY Financial Disclosure Management (FDM)
FDOonline
Financial Disclosure Management System (FDM): https://www.fdm.army.mil/
an electronic OGE-450 filing system developed in house that uses the 450 PDF but electronically routes the PDF to reviewers and a completed copy to the filer upon certification.
Financial Disclosure System (FDS)
FDOonline/HRWorx

Question 32

FDM
internally developed e-filing system for confidential financial disclosure reports
CIA's e-filing system
FDonline
FDonline
Ethics Management and Tracking System.
FDOonline
FDOonline
The agency used the FDonline system for 450 report filing.
Financial Disclosure Management System
US Army Financial Disclosure Management (FDM)
The U.S. Army's Financial Disclosure Management (FDM) system.
DoD Financial Disclosure Management

DoD Financial Disclosure Management (FDM) system for all filers except the DAEO and SES/HQEs that files in Integrity.
Financial Disclosure Management (FDM) System
Financial Disclosure Management System (FDM) run by the Army.
Financial Disclosure Management (FDM) System
FdOnline
Financial Disclosure Management System (FDM).
Financial Disclosure Management (FDM)
Department of Defense-Department of the Army Financial Disclosure Management System.
Financial Disclosure Management (FDM)
Financial Disclosure Management (FDM) system
1. Electronic Financial Disclosure System (EFDS) 2. NIH: NIH Enterprise Ethics System (NEES) 3. CDC: Ethics Program Activity Tracking System (EPATS) and 4. CMS: CATS
FDOnline, Army's FDM, and CBP's HRBE OGE 450 e-filing systems.
FDonline
BOP: FDOnline ATF: SharePoint USMS: e-filing system for OGE Form 450s.
The Financial Disclosure Management System (FDM) OGE-450, confidential Financial Disclosure Forms.
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FDonline (Intelliworx)
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Intelliworx/FDonline
We save Forms 450 on our internal computer systems.
FDonline Filing System
The Agency created an electronic OGE Form 450 system.
FDonline electronic filing system
Ethics Program Tracking System (EPTS).
FDM
FDonline.
NGA uses Integrity for public financial disclosures and FDM for confidential financial disclosures
FDOnline
NSF eFile
NSA's Financial Disclosure Reporting System (FDRS)
Ethics Gateway

A confidential financial disclosure filing system that our IT built.
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CIA's electronic financial disclosure system
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FDonline for OGE Form 450 filings.
Confidential Financial Disclosure System (CFDS)
FD Online
FDonline
ARMY Financial Disclosure Management (FDM)
FDOnline
Financial Disclosure Management System (FDM): https://www.fdm.army.mil/
an electronic OGE-450 filing system developed in house that uses the 450 PDF but electronically routes the PDF to reviewers and a completed copy to the filer upon certification.
Financial Disclosure System (FDS)
FDOnline/HRWorx

Question 33

Using time and attendance software, our agency tracks employee time spent on Ethics generally, but not on financial disclosure, ethics training, or any other aspect of Ethics, specifically, and therefore the internal costs associated specifically with operating FDOnline cannot be calculated.
We do not track the amount of all internal costs associated with operating an e-filing system. We do not track the number of FTEs or any overhead costs of operating the electronic filing systems.
We had a total of 6 ethics officials who utilized the FDOnline system to review OGE 450 confidential disclosure forms. We do not track the associated FTE/overhead costs.
Electronic Disclosure is covered by the DoD's general budget and is not charged to DFAS.
We don't pay anyone so we don't track.
Ethics program does not track.
We use Integrity and FDM run by the Army.
FDM is managed by DoD.
All USDA Office of Ethics employees are involved with the use of our e-filing systems to a certain extent but we do not track the percentage of time spent on such responsibilities.
The Air Force utilizes the Army's system, FDM, for confidential filing. While the Army has informed us this year that the total cost for the Air Force was \$534,090.06 for CY2020, it appears that Army paid the cost. Moreover, we do not have a further breakdown of that cost.
FDM financial information regarding the 21 remaining Federal agencies serviced by FDM will be sent separately to OGC, Ms. Pond.
The amount in 33.c. was paid by the U.S. Army, Office of General Counsel, DoD Executive Agent for the FDM electronic filing system. The Executive Agent provided proportioned cost based upon number of filers in DoD OIG for the purpose of answering this question.

Army is the DoD Executive Agent for the FDM filing system and all funding for DoD users is from Army appropriations.
ATF: part time assistance from 2 FTEs and 1 contractor
For the OGE-450, the Army created and maintains FDM. The Department does not have information on the operating costs of this program from the Army.
DOT does not require employees to track time by task.
It is not possible to break out filing costs from ethics database/tracking costs.
VA does not break out FTE and associated costs for e-filing.
Only identified costs would be pro rata share of manhours of five ethics officials, which is not tracked. No identified significant overhead costs beyond de minimis.
Our IT support creates SharePoint pages for our OGE 450 and Confidential Conflicts of Interest pages. They do not track time spent specifically on our projects.
Our IT team provides these services without tracking specific project costs.
This information may be proprietary. We don't know whether it may be publicly released, and we need to consult with the vendor prior to making a public disclosure.
Not applicable to the agency.
We do not track the costs for using e-filing system.
N/A
NASA does not break down the costs associated with the different reports. The costs reflect the cost it takes to run and maintain the Ethics Program Tracking System.
The FDM system is managed by DOD. NCUA staff time allocated to contract administration and tech support were not independently tracked.
We do not have insight into the internal cost associated with the acquisition of the FDOonline web application.
The total cost for public and confidential is \$59,432 for CY 2020. Since both types of filers use the same system, there is no way of breaking out the cost.
The funding for NSA's Financial Disclosure Reporting System is not controlled or managed by OGC. Of note, costs are not the driver for the use of this system. Rather, the protection of information regarding Agency personnel is the impetus.
It was a simple system we were trying out. It was internally made and internally used.
OMB does not keep track of this information.
The Confidential Financial Disclosure System (CFDS) is one application that is part of a larger web-based platform used by the agency. The costs associated with maintaining each application housed on the larger platform are not individually tracked. The amount listed in Q.33a&c only covers developmental costs specific to CFDS in FY2020.
This was SIGAR's individual cost as one of the DOD stakeholders who uses FDM.
Their system is used for more than OGE-450 filing and therefore costs cannot be limited solely to the confidential financial disclosure program.
N/A
The contract does not separate expenses for confidential and public filings.

Part 7 Comments

Due to USADF's employee size of less than 50, USADF currently accepts electronic submissions via secured email and physical submissions of OGE Form 450 and 450a.
Question 34 - answers are classified.

All OGE 278 Filers filed in Integrity
In 2020, DCSA had two Special Government Employee OGE Form 450 filers who were unable to electronically file their reports in the FDM system because they did not have Common Access Cards needed to access the system. The employees filed their reports using a hard copy OGE Form 450.
<p>Q28 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. 2638.105(a)(1))? (If “never” or “in some cases,” please explain further): [Response covers both public and confidential filers] -Many HR offices dispute that they have a responsibility to do so. -Some HR offices have explained that many organization’s PDs do not specify that the position requires 450 filing. Supervisors determine the need for filing on a case-by-case basis. -Due to position movements, most, but not all, confidential filers were identified within 15 days. -Some installations brief all of the new hires on financial disclosure within two weeks of onboarding, which is how they identify them without HR assistance. - Supervisors are not making the determination as to whether an employee should file in a timely manner, and when they do, they frequently neglect to inform legal of their decision. - Some wings are small enough that they can check in with the units on a regular basis to monitor incoming 450 filers, so HR involvement is not as necessary. -Even when they do acknowledge responsibility, HR offices are frequently inconsistent with notifications, particularly since the pandemic began. -HR has not implemented a system to ensure that notifications are routinely provided to legal offices, nor have they created a checklist for potential filers. -Some installations have established online, self-paced onboarding since the pandemic hit, and that has reduced communication between the HR and legal offices. Q29 How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. 2638.105(a)(2))? (If “never” or “in some cases,” please explain further): -In some cases there were no terminations for the year. -In some cases, the ethics counselors have close working relationships with the filers, and would naturally know when they are terminating, so notification is not necessary. - Some HR offices have declined to provide information to legal offices when personnel are departing filing positions. -There are also announcements for retiring/separating Senior Leaders each week, and you will see their names there, and can then reach out. However, that announcement can be inconsistent about the timing for each individual’s retirement.</p>
Q28 & 29 Most organizations reported receiving the notices in all cases. Of the few reporting never or N/A, most reported that the ethics office does their own tracking via communications with front office staff and including the ethics office as part of in-processing procedures. Q34a Termination filers departing prior to May 15th were permitted to pre-populate and file in FDM.
Question 31. Agency began using FDOonline for 450 filers on December 7, 2020.
Q28 & 29: HR does not notify the DAEO of onboarding political appointees. The DAEO is notified of these new public filers by the White House Liaison’s Office. Q33: Components with legacy filing systems do not break down costs between report types, so all costs are reported as confidential. Additionally, one component reports total combined cost for maintaining entire electronic filing system. This entire amount is reported under internal costs.
For questions 33 and 34, in 2020, several agency components procured licenses to use FDOonline for electronic filing of confidential financial disclosure reports. The system went live in late December 2020, and the first filings submitted for these components in FDOonline

<p>occurred in 2021. One agency component, the Federal Aviation Administration, already utilized FDOonline and accounts for all FDOonline electronic financial disclosure reports for calendar year 2020.</p>
<p>Q30: Most bureaus use Integrity only.</p>
<p>N/A</p>
<p>N/A</p>
<p>Question 33 - In 2020, we had expenses for two financial disclosure filing systems. We had the ongoing maintenance of our existing financial disclosure filing system (NEETS II) and the annual maintenance costs of our newer launched financial disclosure filing system (FDOonline). Question 34(b) - Please note only 4,415 were required to file in 2020, as 25 of those whose filed had due dates in 2021.</p>
<p>18 confidential financial disclosure filers emailed their responses to our office.</p>
<p>N/A</p>
<p>#30-34: Integrity was used for our three public filers (new entrant, annual, and termination filers). A Google Drive tracker system was also used to track whether public and confidential filings were completed.</p>
<p>Q. 34 - Paper reports were received for some termination filers, IPA new entrant and SGE reports. Additionally, all alternate OGE 450 form filers submitted reports electronically through the NASA Solicitation and Proposal Integrated Review and Evaluation System (NSPIRES).</p>
<p>Question #34- Data not included/is classified.</p>
<p>28. We are notified by OHR about individuals who have been hired or promoted to a filing position within each pay period. However, the Ethics Office is not always notified about assignments to acting positions within 15 days. When this occurs, we communicate with the individual as soon as we are aware of the assignment and proactively issue extensions and offer assistance so that we can prioritize the completion of the report within reporting timelines.</p>
<p>Question 34: The numbers reported above are percentages, rather than numeric counts of filers. Actual numbers are made available to cleared OGE personnel when required. The Agency uses Integrity only for filers whose forms are required to be certified by OGE (the DAEO and one PAS employee).</p>
<p>Question 27: The agency utilizes a notification system to alert relevant agency staff about the on-boarding and departure of employees. The human resources group manages this system, which includes the ethics officials. This system has worked very well for employees occupying positions that require a 278 report. Improving from last year, HR reported all new employees entering a 450 position.</p>
<p>#34 - Certain Senate paid OVP employees file both the OGE 278 and the corresponding Senate form.</p>
<p>28(b) & 29. We will talk to the Acting CHCO to implement solutions to these breakdowns in communication. There is now a new exit checklist in place that has improved the timeliness of our knowledge of individuals leaving the agency. 31. We did work with Army in 2020 to prepare for the use of their Financial Disclosure Management (FDM) system for Confidential Financial Disclosure Reports in the 2021 filing season. We will report our usage of it in next year's annual questionnaire.</p>
<p>N/A</p>
<p>None</p>

34a: All of our Annual 278 reports were filed in Integrity. However, we had four, 278 filers use FDM to file their Termination reports. 32. We switched to Integrity in 2020 and used Integrity for all Annual filings. We had a handful of filers who left at [t]he beginning of 2020 however who used FDM to file their termination reports. As they were leaving the agency, it seemed easier to have them use a system that they were familiar with.
n/a
Question 34: all other public filers filed in Integrity for 2020, as shown in Part 8, below.
N/A

Question 35

We are working with one employee who has had difficulty gathering and submitting information for her annual report. We will likely assess a late fee given the amount of time she has had to file her report.
Due to personnel turnover in the HR department, the GC ethics counselor did not receive the notification that a GS employee was promoted to SES. As a result, one new entrant report was not completed until 2021.
Some filers were deployed, some failed to comply before the end of the year.
One mid-year new entrant has yet to file: we are ensuring he does so soon. The Army's numbers for this question do not include Army officials assigned to non-Army units. This category includes one career new entrant who was required to file but did not 14 "other" new entrants required to file who indeed filed 13 career employees required to file annual report who indeed filed 88 "other" employees required to file annual reports, one of whom did not one career employee required to file a termination report who indeed filed and seven "other" employees required to file termination report who indeed filed.
Two required filers did not submit their reports until after December 31, 2020.
Of the few agencies/commands with discrepancies, these were primarily attributed to issues accessing/using Integrity, difficulty contacting/assisting filers due to COVID, and ethics personnel turnover/staffing.
1 non-compliant annual filer. (Other) Did not file her annual report until January 2021.
Two filers filed in 2021, and we continue to work with two employees.
Some filers left without notice and the Department is trying to obtain those reports.
Discrepancies in required and reports filed in part to priorities for pandemic work, extended leave or employee suspension, or ongoing criminal case investigation.
Follow up on the 3 outstanding reports underway.
New Entrant filer did not submit report on time. The report was submitted in CY 2021
Our office uses personal email addresses and certified mail to contact filers who have left the Department to remind or have failed to file a final OGE-278 reports. If we are unable to contact the employee using a personal email address, we will use the certified mail process. Due to the Covid-19 virus and our agency's leadership requesting most employee's telework, it has been difficult to send certified mail. This is due in part to the sporadic mail pickup from offices during this time. Our office will continue to reach out to these employees to the best of our ability. For those employees who have not submitted their New Entrant Reports, they have been notified and we will escalate their non-compliance to their leadership until the reports have been submitted.
The reports that were not filed were incomplete. Ethics officials continue working with these filers to obtain certifiable reports.

A filer passed away prior to submitting his annual report.
N/A
One Career and one SL did not file an annual report for 2020. One Schedule C Termination and one SL filed their required 2020 report in January 2021. The agency is addressing the two that have not submitted their annual 2020 reports.
The numbers reported above are percentages, rather than numeric counts of filers. Actual numbers are made available to cleared OGE personnel when required. Some filers remain out of the office due to their increased risk of severe complications from COVID-19, and therefore do not have access to NSA's electronic filing system. Most filers in this category have submitted PDF reports outside of the FDRS system, but the ethics team continues to work with filers to ensure those who are not in the office and have not submitted a PDF report satisfy their reporting obligations.
One employee received late notification of her filing requirement and left the agency shortly after. Filer did submit an OGE-450 during this time period.
One career employee retired and did not complete a termination report. One required termination report was file in January 2021.
One former employee seems to have left during the pandemic without filling out a termination report. We are attempting to contact him now.
One employee plead guilty to misuse of position and did not file his termination report.
Filers are deceased, on extended sick or military leave
35a: We had one employee out on extended military leave, so he was unable to complete his annual report until recently. 35c: We had one employee pass away.
Not all bureaus and field offices were aware that GS-15/equivalent or below employees assigned to superior positions or acting in such positions for more than 60 days must file 278 reports the Agency began remedying this in late 2020/early 2021, hence the discrepancy.
N/A
The USAGM Ethics Office was unable to obtain from the Office of former CEO Pack or OHR the names and/or filing status of some non-career SES, Schedule C and other consultants hired by CEO Pack during his tenure. When the Ethics Office obtained the names of some OCEO staff, typically on an ad hoc basis, we assigned New Entrant reports for them. Some of the non-career staff completed the reports and some did not. A consultant hired to support CEO Lansing whom CEO Pack subsequently terminated also did not file his New Entrant (which the Ethics Office assigned in an untimely manner) or Terminations Reports. Finally, our DAEO (who indicated that he had Integrity access issues while on extended leave from the agency) has not yet filed his 2020 Annual Report.
The missing report was not assigned as the Ethics Office did not receive notice of the departure and was unable to obtain contact information for the employee after separation

Question 36 Why Review not timely

COVID-19 resulted significant lockdowns of retirement home campuses employees were also subjected to periods of quarantine (the termination report occurred before significant COVID-19 lockdowns and was a paper file)
The number of 278e reports collected, their complexity, and insufficient number of ethics officials to process the reports, contributed significantly to extended review times. However, the review times for 2020 were significantly improved in comparison to 2019 as a result of implementing streamlined review processes, and we will seek further timeliness improvements

<p>in 2021. Additionally, the Ethics team plans to onboard an additional attorney in the first quarter of CY2021.</p>
<p>As noted below, USDA's Office of Ethics is, proportionally, one of least resourced and smallest Ethics Office of any Cabinet-level Department. At current staffing levels, each OGE 278 financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly 100 OGE-278e reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This large report volume combined with a large client population (~5,000 employees per advisor) and a significantly under-resourced Ethics Program makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics Officer for every 5,000 USDA employees, USDA's Office of Ethics has suffered from under-investment and is one of the least resourced Ethics Offices of any Executive Branch Department. •</p>
<p>Some filers did not respond when additional information was needed.</p>
<ul style="list-style-type: none"> •There was some confusion as to which certifier was responsible for a particular attorney. •Reports were not being assigned efficiently, and some certifiers were not given adequate time to review the report. •Simple oversight. •Pressing assignments made it difficult for undermanned offices to keep up with the volume of reports.
<p>The transition from FDM to Integrity is the main reason for the lengthened Army processing times. The COVID pandemic played a contributory role as well. The responses to Question 36 do not include Army officials assigned to non-Army units. These officials include 12 “other”new entrant reports certified in 2020, of which 7 were initially reviewed and certified within 60 days 13 career annual reports certified, of which 12 were initially reviewed and certified within 12 days 87 “other”annual reports certified in 2020, of which 68 were initially reviewed and certified within 60 days 1 career termination report certified in 2020 which was initially reviewed and certified within 60 days and 7 “other”termination reports certified in 2020, all of which were initially reviewed and certified within 60 days.</p>
<p>The Department of Defense requires that supervisors review reports in addition to the command ethics counselor and DAEO. The multiple levels of review may delay the ethics counselor's initial review. Furthermore, it is likely that some of the ethics counselors completed their initial reviews within the required time frame but failed to end initial review in Integrity. While the Office of the Assistant General Counsel (Ethics) advised the command ethics counselors on how to end initial review in Integrity, it is the first year that Navy has used the system for all OGE 278e filers.</p>
<p>Of the few agencies/commands with discrepancies, these were primarily attributed to issues accessing/using Integrity, difficulty contacting filers due to COVID, and ethics personnel turnover/staffing.</p>
<p>Reviews more than 60 days after submission due to the challenges of the COVID-19 global pandemic, and the addition of new ethics staff and attendant learning curve. Reports were certified or closed more than 60 days after submission due to the challenges imposed by the COVID-19 global pandemic and attendant delays cause in obtaining additional information from filers.</p>
<p>Staffing shortage and transition to mandatory telework due to COVID-19.</p>
<p>One component had staffing changes within its ethics office which led to some delays. There were some late notifications of temporary appointments to filing positions in acting capacities.</p>
<p>Final certification was delayed due to priority pandemic legal requirements</p>
<p>Workforce disruptions due to COVID.</p>

Office staff had shifting priorities and significant work burdens. In some cases initial review by management officials was delayed. Technical glitches meant some reports did not appear in reviewers' queues, and dislocation due to COVID slowed reviews, particularly in the spring and summer. For PAS reviews, most significant factor was waiting for filers to provide additional information.
Turnover in one component led to some delay and training of new 278 reviewers in a second component led to some delay. This has now been resolved.
New workstream stemming from CARES/pandemic implementation staffing/workload issues, including new reviewers and parental leave of a primary reviewer departure of ethics officials administrative oversight in part due to PIV card issuance delays to new employees.
Reviewer's caseloads.
Note that of 563 filed, 547 were reviewed within 60 days and 524 were closed within 60 days. EPA Ethics reviewed 97% of all 278s within 60 days, despite adjusting to COVID working conditions.
One filer submitted nearly two months prior to due date before agency began prioritizing reviews the 2nd filer had complicated holdings requiring significant edits, amendments, and ultimately a CD request.
Required additional information from the filer to complete review
One Schedule C employee was required to file an annual report, but based on erroneous guidance from OGE, did not file.
N/A
COVID-19 pandemic response, work environment, unplanned sick leave, and temporary responsibilities supporting an enterprise reorganization under which all ethics offices now report to the DAEO implicated financial disclosure review turnaround time. One work location did not document timely visual review prior to certification so that the certification date was counted as both the initial and final review date.
additional information was being sought
At the start of 2020, the NTSB had several 278 reports for 2019 (covering CY2018) to close out. Those reports explain the higher number of reports certified in 2020 compared to the number of 278s that employees were required to file in 2020 (see question 35). The introduction of max telework in response to the pandemic required significant adaptation in the ethics program and the agency's work generally. We were required to adjust our review protocols in the virtual environment for our 450 reports because those were submitted as paper reports. This adjustment extended the time for review for the 450 reports, which impacted our ability to review the 278 reports within the required timeframe.
Ethics staff members shortages.
A very small number of reports were not reviewed and certified within 30 days of submission because additional information was needed from filer or discussions were required.
One annual report was filed in June 2020 and reviewed and certified in October 2020.
As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports.
Workload
Administrative oversight or working with employee to develop information.
36b: The 3 reports that were certified outside the 60 day window were asked follow-up questions regarding their reports which ended up extending outside of the 60 day review period.

36c: The filer completed their termination report by the due date, but I was out on maternity leave at the time, so it was certified the week I returned back to work.
One career SES was granted an extension and filed during her extension period.
Lack of manpower and untimely access to new hire information.

Question 36 Why Cert not timely (other)

Additional extension granted for USADF only public filer, USADF President and CEO.
members needed more time in light of COVID-19 restrictions etc.
See explanation provided in Question #36.
Volume of reports per reviewer.
•For many filers, it was the first time filing in Integrity, and they were confused by the format, and some differences in instructions, which resulted in increased requests for additional information. •The COVID-19 shifts in duty location created widespread difficulties in accessing reports in a timely manner to respond to questions, and to certify the reports. •Turnover in staff and leadership, and other manpower deficiencies, overwhelm undermanned offices (even if temporarily undermanned).
Difficulty in accessing senior leaders to review reports - the Department of Defense Joint Ethics Regulation mandates supervisory review of all financial disclosure reports.
The Department of Defense requires that supervisors review reports in addition to the command ethics counselor and DAEO. The multiple levels of review may delay the DAEO's final certification.
Due to COVID-19, some filers had difficulty obtaining additional information from their financial institutions. One component had staffing changes within its ethics office which led to some delays. There were some late notifications of temporary appointments to filing positions in acting capacities.
Final certification was delayed due to priority pandemic legal requirements
Workforce disruptions due to COVID. Responses from filers to requests for additional information were delayed more than usual due to COVID. Some certifying officials left, requiring re-designation and training of new certifying officials. Increase in number of filers in one component combined with shortage of reviewers and COVID disruptions on logistical operations delayed review and certification.
COVID-19 Pandemic Counsel for Ethics was on extended leave, then retired.
See above.
new workstream stemming from CARES/pandemic implementation staffing/workload
Filers not responding timely to questions or requests for clarification
One filer one medical leave one filer awaiting OGE approval of waiver to report certain gifts.
Executive Director retires on December 3, 2020 60 days from submission has not yet expired and thus cannot certify that DOC Ethics office as
Due to COVID-19 Agency Director could not obtain a PIV card to certify DAEO report. Agency worked with OGE (Integrity Help Desk) to change the Security Level which added administrative time to the overall certification process.
Needed more time
Timeliness of final certifications generally was implicated by factors noted in the comment box immediately above. In this context, one PAS form required clarification following initial review. One work location documented timely initial review contemporaneous with initial

screening and written comments, but final certification timeliness was implicated by factors in the comment box immediately above.
Responses to follow-up information was delayed because of family illnesses and deaths as well as long term medical leave of one filer.
In addition to obtaining additional information from filers, the adaptation to the pandemic, as discussed above related to the review of 450 reports, also caused some delays in the certification of reports.
Five reports were certified on the 61st day. Schedules were very tight due to Covid restrictions.
As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports.
Report of former OIG Deputy Asst. Inspector General of Investigations was requested to provide additional information and that request was fulfilled after the 60 day requirement.
Delay was due to illness (filer) and unresponsiveness from filer
Admin error: 1 FDM filed termination report remained "open" longer than 60 days. All PGE guidance was issued timely for this filer and initial review had been closed prior to 60 days.
There are only two employees at USCPAHA. One employee (the ADAEO) left in March 2020. She certified the report prior to leaving. However, the report kept bouncing back to the DAEO (the 278 Filer) to certify their own report. This was brought to OGE's attention repeatedly. It wasn't until the new employee (hired in Sept) was made the ADAEO and went through minimal training so that she could certify the report and send it on to OGE for review.
see prior answer
Agency workload

Part 8 Comments

Question 35 - the CIA financial disclosure database does not differentiate between career SES and SES officers who are term, non-career. We count all as career SES except for our one (1) PA position, which we count as non-career SES. Numbers are classified. Question 36 - the CIA financial disclosure database in 2020 did not track with precision dates of "initial review." Numbers in rows reflect informed conclusions based on database functionality at the time. We anticipate greater precision in tracking the "initial review" in 2021 due to upgrades to the database functionality. Numbers are classified. Question 38 - granted 45-day extension to all annual filers of the OGE Form 278e to account for the pandemic quarantine. The number identified for "granting filing extension" is the number of officers who requested additional time beyond the initial 45-day extension.
For #40, our agency received one FOIA request for the 278 filings of 2 public filers. We received no 201 forms, however.
Question #38: One filer was assessed a late-filing penalty for four (4) transactions. Two of those transactions were waived and a late-filing penalty of \$400 assessed for the remaining transactions. That penalty will be collected from filer upon his return to the office from the pandemic work-from-home mandate.
In regards to question 38, extensions were granted for one termination report in which there was an inadvertent error in notification of termination, and for an annual 278 filing where the filer was on extended medical leave. In both cases, the filer completed before the extension(s) period expired.

N/A
Question 37 does not include 40 periodic transaction reports filed by Army officials assigned to non-Army units. Question 39 does not include 3 late fee waivers for OGE 278 reports filed by Army officials assigned to non-Army units, and 1 late fee waiver for a periodic transaction report filed by an Army official assigned to a non-Army unit.
Q.37: 2020 was the first year that Department of the Navy filers submitted their OGE 278T reports electronically. The increased number of OGE 278T filings in 2020 is likely due in part to the electronic filing and ease of tracking the reports.
Question 38.a) Due to COVID-19, the DAEO granted an initial 45-day filing extension for all annual OGE Form 278e reports, so the number reported includes all annual reports plus extensions granted on any other report type.
To resolve the certification issue all of the DOL public filers were input into the Integrity system by the end CY 2020.
Question 35: All required reports were filed in 2020, but we note that the total number of reports increased in 2020 as a result of a comprehensive public financial disclosure filer audit and reconciliation undertaken by ethics officials. This audit resulted in a number of reports for prior years, including 2019, being filed in 2020. As reflected in the response to Question 38, those prior years' reports also resulted in an increase of late filing fee waivers and payments, as appropriate. Questions 35 and 36: The difference in the number of reports filed in 2020 and the number closed in 2020 is the result of certain reports submitted at the end of 2020 and which were still under review and not certified or closed by December 31, 2020.
Q35 & 36: At DO/HQ, Integrity numbers from the data pull may not be entirely accurate so we also relied on internal data. Q38: Integrity may reflect differences in late fee numbers for 278s and 278-Ts because these may have been incorrectly categorized—i.e., waivers for a 278-T were noted on a 278 that was timely filed. Filers were not always required to file separate 278-T reports after already reporting the transactions on their 278e reports.
#35: Reported numbers do not match Integrity Annual Data extract due to filers misreporting their category, one filer in FDOnline, and non-filer reports created for testing purposes (which agency did not realize could not be deleted from system once created).
N/A
N/A
Questions 35 and 36 - (1) Please note that the filing and review report numbers listed in Integrity are not accurate for our agency. Filers inadvertently selected Non-Career SES or Career SES employee categories. The FDIC does not have any non-Career SES or Career SES employees.
N/A
#38: Our President/CEO and DAEO initially submit their 278-T transaction reports on a spreadsheet via email to OGC which is then reviewed by the AGC. Once reviewed by the AGC the transactions are uploaded into Integrity and subsequently certified by the GC (or OGE for the DAEO). The dates that 278-T reports are submitted via email are kept in a Google drive tracker. The 3 Late Filing Fee waivers were granted because OGC was conducting a review of whether the President/CEO and DAEO's transactions qualify for monthly reporting.
Comment for No. 35: NCUA's senior-level employees are not appointed as SES. Rather, they are appointed as Senior Staff Positions (NCUA's SES-equivalent). For CY2021, NCUA's

Office of Ethics Counsel is updating options in Integrity to ensure technical consistency of the filers' respective appointment category.
Per question 40: an outside group filed 3 OGE 201 forms seeking information on the same filer. Information was not provided because we were unable to locate the disclosure, which was not submitted in Integrity and filed under unusual circumstances that were disclosed in previous questionnaires. This was undertaken in consultation with OGE. Despite logistical difficulties occasioned by the pandemic and staff turnover, when we located the report we promptly disclosed the information to the 201 requester. One other OGE 201 was filed and disclosed in due course.
Questions #35, #36, and #37 - Data not included/is classified
Re: 36. - One annual report was not certified in 2020. There was a technical issue with the eFile system. The task linked to the employee's prior report did not process properly because of a workflow error. Therefore, when the employee filed the annual report, the prior task that never reached the "certified task" library blocked the annual task from processing the report. The report was in limbo until the problem was discovered the last week of December. Once IT re-ran the prior task's workflow successfully, the annual report moved to the eFile pending review folder. Technically, the employee filed the annual report on 7/29/20, but the system did not fully process her submission until 12/30/20. The report was reviewed and certified the first week of January, 2021. Re: 38b. - Waivers - Most waivers were granted because a spouse did not provide timely transactions for their accounts to the employee. Others were granted because deaths/illness of family members delayed filing timely reports.
Comments for Part 8: Question 36: The numbers reported in this question are percentages, rather than numeric counts of reports reviewed. Actual numbers are made available to cleared OGE personnel when required. The reduction in NSA staffing (see comment for Question 18) occurred shortly after the 2020 annual filing deadline for OGE450 reports and continued through the deadline for OGE278e reports. During this time, access by OGC ethics officials to NSA's internal filing system was limited. These ethics officials did not fully return to the office until the end of July, and the Agency did not reconstitute until September. Thus, most reports filed before this timeframe were not timely reviewed. Since returning to the office, the ethics team has worked to complete their reviews while also addressing COVID-19-related issues within the Administrative Law & Ethics purview. Question 38: The numbers reported in response to this question are percentages, rather than numeric counts extensions and waivers. Actual numbers are made available to cleared OGE personnel when required. Due to the reduced NSA staffing resulting from COVID-19 (see comment to Question 18), many filers of the OGE278e report were not in their offices and did not have access to NSA's internal filing system. The DAEO worked to ensure filers had the ability to comply with the applicable filing deadline including granting extensions of that deadline consistent with 5 C.F.R. § 2634.201.
#40 - Any requests for a Commissioned Officer's financial disclosure, including those employed by the OVP, are handled by White House counsel.
N/A
None
38a: Both filers granted an extension did not have to pay a late fee, as they were granted a filing extension for health reasons and extended military leave. A waiver was not necessary, as they filed within the timeframe we discussed with them. 38(b): We are currently working with Treasury and our payroll office to get the fines paid. The filers have been notified and we are just figuring out the best way to accomplish them paying the fine.

n/a
Numbers in tables for questions 35 and 36 indicate Integrity data as well as 2 Termination reports filed in FDM.
N/A
Q40 - We received a single request that we were unable to process due to a lack of sign-off on release by CEO Pack's Office.

Question 41

One filer, serving as a consultant, was notified of the filing requirement and was given an extension of time in which to file his report. Filer notified the Ethics Office of his intent to leave the agency and left before filing his report. One filer occupied a Public Financial Disclosure filing position and changed to a position within the CFTC that required filing the OGE-450. In lieu of collecting a new entrant OGE-450, we accepted her OGE-278e Termination Report as permitted by 5 C.F.R. 2634.903(b)(2)(i).
The list of personnel required to file in 2020 had some erroneous entries. Personnel were assigned reports with no actual need to file determined by submission of the Job Aid to all filers and their supervisors.
Not clear why one was never filed.
Some employees failed to file due to transfers to other agencies, leaving government, or long term leave. A small number of employees simply failed to submit their reports despite being on duty and receiving more than 20 past due filing notices from the USDA Office of Ethics.
193 confidential financial disclosure reports were not filed due to many reasons. There was a mandatory telework policy for all Commerce employees from March-December, 31, 2020 and some employees did not have home computers or printers to print paper reports. Some employees were on medical leave due to Covid-19 illnesses or serious medical illnesses, or on military duty which did not allow them to use their Commerce laptop to print and send their reports. Ethics staff mailed reports to filers homes and picked up mail from the building that remains in Phase 1 operating status.
Please see Additional Comments at the end of this Part
Assignment error, transfers and departures inaccurately noted in FDM, combat zone extensions.
The Department of the Navy has a large mobile population stationed around the globe. It is likely that some of the outstanding reports are the result of filers and ethics counselors leaving positions through out the year. In late 2020, the FDM team added a new Disclosure Detail Report that identifies the ethics counselor/OGE 450 Certifier assigned to a given report. The DDR update will allow the DDAEOs to better monitor the OGE 450 program and ensure reports are timely submitted and certified.
Primarily IT and staffing issues, most of which arose due to COVID.
3 employees on military leave and 1 employee on extended sick leave. 1 employee did not have access to records in order to file the report.
Nine filers are on leave due to extenuating circumstances. Nine reports received prior to COVID and paper form in office. 17 reports require follow up.
Some filers were on extended medical leave some new entrant filers are still within extended deadlines.
All were new filers who either left government without filing or whom were referred for compliance at end of year.

OIG: One filer received multiple extensions while on extended leave/deployment and remains on extended leave.
Extended leave, including military and sick, administrative errors, program disruptions due to COVID. Note: line Assistant United States Attorneys (AUSAs) are required to file the OGE-approved alternative GCO-1 form for each matter/case assigned, The actual # of forms is not tracked as they are retained in each case file. There are approximately 5,766 AUSAs, and we counted 1 alternative form as required and filed for each AUSA, although they may be assigned to more than one case per year, to reflect the # of AUSAs who complied with the confidential financial disclosure reporting requirements. Similarly, Antitrust Division has 153 filers who filed an alternate form, a Certification of No Conflict of Interest, in individual matters/cases, and we counted 1 alternative form as required for each of those 153 filers.
Reasons provided: COVID-19 Pandemic employees on extended leave, employees on military leave, notifications not received due to the unavailability of the shares services
#41. The most significant factors this year were disruption and dislocation due to the COVID pandemic, which interrupted communications between managers, the ethics office, and filers around the word. This made it more difficult to update filing status and confirm whether individuals were required to file this year based on their duties. And dislocation made difficult in many cases to access the on-line filing system. Almost all the reports that were not filed in 2020 were from overseas, with a very high percentage pertaining to locally-employed staff.
The discrepancies between the number of employees who were required to file confidential financial disclosure reports and the number of employees who actually filed are attributable to employees on extended administrative leave, FMLA leave, military deployment, or placement in leave without pay status.
Most of these employees were on FMLA/LWOP/extended sick leave/military leave.
Filers on extended leave filers who were promoted were not timely notified (since corrected)
Although our records show that 532 filers did not file a confidential report, it may be that a significant number of these were not actually required to file, for example because the report was assigned late in the year such that the due date fell in 2021, or because the individual left the filing position before the report was due.
In year 2 of electronic filing for 450s, we experienced some notification errors. The system failed to send filing notifications to a number of employees (that glitch has since been repaired). We also learned that some DEOs (particularly those new to the role because of reorganization or change in duties) apparently failed to follow up with their filers. Other DEOs report that some filers were on extended medical leave experienced difficulty with the e-filing system but did not resubmit their forms left the office or EPA or retired prior to filing date.
The single employee who did not file has been on extended sick leave.
Two recently discovered new entrant filers, should have been required to file in CY20 but not added to system until Jan 2021.
One Employee was on extended sick leave, another employee was detailed to another agency and the other three employees retired before February 18, 2020.
Four reports could not be verified as received until we return to facilities. Two employees file in January 2021.
N/A
One filer did not meet the deadline for submitting the confidential financial disclosure due to workload issues and has been directed to submit the report as soon as possible.
One report was outstanding at the end of the year.

30 did not submit a report for which follow up was delayed due to COVID-19 response demands and is being pursued in conjunction with the present 2021 filing cycle.
One filer is away from the agency due to a long term sick leave. She performed no work for the agency during this calendar year, and a disclosure will be sought upon her return to work to ensure that no conflicts have emerged in the interim. Another filer did not timely file a Confidential Financial Disclosure. After communicating with the filer, the agency was able to obtain a report that covered the new entrant time period.
The OIG office at NSF has an ethics attorney that is responsible for review and collection of OGE Form 450s. OIG has been filing paper reports, but OGC worked with OIG and our IT team to transition them to the NSF eFile system. Per OIG, one NE report was not filed in 2020. This occurred in October 2020 during the transition to eFile and while OIG employees were teleworking full time. The filer will submit an annual report, which will be carefully reviewed for conflicts or other issues. See also response to question 42 for further explanation.
Question 41: The numbers reported in this question are percentages, rather than numeric counts of reports filed. Actual numbers are made available to cleared OGE personnel when required. Some filers remain out of the office due to their increased risk of complications from COVID-19, and therefore do not have access to NSA's electronic filing system. Because those filers remain out of the office, they are not performing their work roles that implicate the filing of the OGE450.
One employee entered the agency in June 2020. He was designated as a filer. Despite initial follow up with the employee to file in June 2020, we did not receive a new entrant report. Upon discovering this in January 2021, we immediately contacted the employee. The employee has filed a new entrant report. Additionally, during our preparation for the 2021 450 reports, we identified six employees who entered filing positions before 2020 but were not categorized as filers. These employees are completing new entrant reports.
One filer is on extended medical leave and has no current estimated return date.
One individual's filing requirement was overlooked as she was moving between positions. Two did not file by December 31st. For one individual, we were asked not to pursue their fulfillment of the requirement as there were extenuating circumstances regarding their ongoing employment.
A New Entrant was not added to the 450 filer list.
Employees were on extended leave.
NA

Question 42 Why review not timely

Question 42: The numbers reported in this question are percentages, rather than numeric counts of reports reviewed. Actual numbers are made available to cleared OGE personnel when required. The reduction in NSA staffing (see comment for Question 18) occurred shortly after the 2020 annual filing deadline for OGE450 reports and continued through and after the deadline for OGE278e reports. During this time, access by OGC ethics officials to NSA's internal filing system to complete reviews was limited. These ethics officials did not fully return to the office until the end of July. We note that 85% of OGE450 reports filed were reviewed and certified by September 18, which is 60 days after the ethics team fully returned to the office.
Ethics staff member shortages.

Some reports required additional discussion with the filer and the addition of information prior to certification. The answer to question 42b (number of certified reports that received an initial review within 60 days) understates the actual answer. Some OMB 450 reports were certified without separately providing an initial review date which, in virtually all cases, would have been within 60 days. Changes have been made to the 450 system to rectify this reporting issue.
One report required rework, and most employees were out of the office for prolonged period due to Covid restrictions.
N/A
N/A
See comments below in response to "other" category.
Additional information required. Remedial action relating to filer. Extended leave and systems errors.
Administrative oversight or working with employee to obtain information.
42a: Two new filers completed their New Entrant reports at the end of the year, so the 60 day certifying window extends to 2021. The reports aren't late and haven't been certified late. 1 filer completed her New Entrant report on time, however she had a lot of issues with FDM trying to amend her report. As she was trying to access the system, I went on maternity leave and her issues couldn't be fixed until I came back. She was able to finally fix the problems upon my return, but the report went outside the 60 day window. Her report was also initially reviewed timely. 42b: same reason as above. The 60 day window extended to 2021. 42c: Those reports were asked follow-up questions. Also, FDM does not allow us to certify a report until the supervisor has reviewed the report.
n/a
We unexpectedly lost one of two ethics specialists who handled the bulk of the 450 reports
Additional information was being sought
Due to pandemic, some hard copy files were not available after the office was in 100% Telework status. Also Litigation deadlines impacted ability to review files after they were available.

Question 42 Why cert not timely (other)

Staffing challenges in the midst of the pandemic quarantine.
Report was originally submitted in paper format and was initially reviewed within 60 days however, due to pandemic, original submission could not be certified within that time period. Digital copy was requested and certified after 60 days.
Some reports were not certified within 60 days because the reviewing official had to wait for the filer's supervisor to review and sign the report before it could be certified (paragraph 7-306 of the DoD Joint Ethics Regulation, DoD 5500.07-R, requires that all OGE Form 450 reports must be reviewed and signed by the filer's supervisor). Additionally, a few reports were not timely certified due to a bug in the FDM system which disabled the function that allows reviewers to search for reports requiring action. These reports were immediately reviewed and certified upon discovery of the issue.
Waiting for supervisor review as required addition DoD ethics regulations.
Filers added during the season and reviewers not properly checking their requirements to certify. We are working to ensure all ethics counselors routinely review the FDM system for outstanding reports.
Volume of reports per reviewer.

We had to re-assign some reports due to a staff member with a serious medical illness.
Please see Additional Comments at the end of this Part
COVID-necessitated transition to telework and related issues, supervisory review delays (the Department of Defense Joint Ethics Regulation requires supervisory review of all financial disclosure reports), illnesses, personnel turnover, high operational tempo, and ethics personnel shortages.
The Department of Defense requires that supervisors review reports in addition to the command ethics counselor. The dual level of review may delay the ethics counselor's final certification.
Unaware report was in FDM Manage Exceptions folder.
Administrative error and database instability.
Reports filed on paper review delayed due to COVID.
One component with almost 900 filers was still using a paper-based filing system, and many of the forms were inaccessible or difficult to move to certifying officials once that component moved to 100% telework due to COVID-19. That component is switching to an electronic filing system this year. Other delays were due to technical issues, staffing shortages, and slower processing times due to COVID-19 telework and new staff who were being trained. Some pending reports are still within review timeframes.
Program disruptions due to COVID and administrative errors.
Reasons provided: COVID-19 Pandemic personnel on extended leave
See above.
Due to the public health emergency and rapid shift to telework, some reports were left physically within the office and not certified or closed within 60 days.
Pandemic delays, including manual review of physical copies of reports and files at one bureau. Once access to files was restored, majority of reviews were completed and certified within 30 days. That bureau is transitioning to an electronic review method for 2021. At another bureau, administrative oversight in part due to PIV card issuance delays to new employees other delays include staffing/workload issues (training new reviewers and parental leave of a primary reviewer departure of ethics officials).
We had made a significant change to move away from paper filing, which created a learning curve for filers and approvers alike. We experienced notification errors (e.g., reviewers were not automatically notified by email when a form was submitted for their review). EPA Ethics had to directly notify DEOs to check the system, which exacerbated delays. The notification glitch is now fixed. Another development problem occurred because of the type of software licenses EPA held. The system would remove ethics official permissions if they hadn't logged in over the previous 90 days. When this happened, the ethics official would need to have their access re-provisioned, and all of the forms in the ethics official's queue would need to be re-shared with them. In some cases, ethics officials were unaware that forms needed to be re-shared, so they didn't know there were forms in their queues awaiting approval, delaying reviews.
As discussed above, all report certification were late due to higher priority tasks of reviewer once reviewed, reports were certified promptly.
See above explanation.
Hundreds of reports are reviewed and certified by supervisory managers in offices and divisions throughout the FTC. Despite repeated reminders from the Ethics Team, inevitably a small number of managers fail to timely review and certify reports.

The agency rolled out a new financial disclosure system and experienced various technical issues. System error caused some reports to be reviewed and certified late.
#One (1) Filer report was certified beyond 60 days due to an administrative/ technical system access issue.
Approximately 175 filers were added due to a major procurement activity requiring additional individually focused ethics opinions/discussions that delayed final certification of reports. Alternate forms identifying situations where an individual was unable to serve were accordingly not certified. Extended medical leave also implicated review staffing levels.
One form was initially reviewed but the filer left NARA before certification could be completed. One form was not initially reviewed or certified during the reporting period due to administrative oversight.
The reports were received in a timely manner and initially reviewed for ethical issues prior to closure of the NCPC office due to the covid pandemic. Upon initiation of a mandatory work-from-home order by the Executive Director in early March, the reports were left in locked file cabinet drawer in the office and could not be retrieved until early May when staff was again allowed back in the office for a limited period of time. Once retrieved, all reports were again reviewed and certified.
The majority of delays were due to unanticipated work demands and challenges due to the COVID-19 pandemic. Other delays were due to requesting additional information from filers and technical issues with the 450 filing system.
One NE report, a paper 450, was filed in March 2020 while OIG employees were working at home during the pandemic, and was not certified in 2020. Also, as explained above, one NE report was not filed in 2020 as it should have been while OIG employees were working at home, and during the transition to electronic filing. OIG is taking the following steps: (1) full transition to eFile (2) eliminating supervisory review of reports and (3) strengthening internal processes to identify new filers and ensure timely filing of NE reports.
Please see the above response explaining why some reports were reviewed more than 60 days after submission.
The NTSB has traditionally received paper Form 450s. The pandemic disrupted our normal ability to review these reports. Although initially reviewed in 60 days, nearly all of the reports that were not certified within 60 days required additional follow up with the employees. For the 2021 reports, we are requiring employees to file electronic PDFs to ease the maintenance and review of records.
As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports. In addition, we are now implementing the use of an electronic financial disclosure management system to improve this aspect of our ethics program going forward.
N/A
Most of the reports certified after 60 days were certified within 1 or two additional days. The majority of those certified later than that were returned by the reviewers to the filer because additional information was being sought. Occasionally competing work demands contributed to initial reviews or certifications beyond the 60 day timeframe.
1 employee needed to make amendments and I went on maternity leave, so I couldn't re-review and certify until I was back in November. 1 filer wasn't showing up while conducting a search in FDM for completed reports. 1 filer had been initially reviewed, but not certified until 61

days and the other filer completed her report early in January, but FDM failed to send out a notification email that the report had been submitted.

Does not apply

Agency workload

Part 9 Comments

Question 43. One filer did request an extension but did submit public financial disclosure by the original deadline.

Question 41 - numbers are classified. Question 42 - the CIA financial disclosure database in 2020 did not track with precision dates of "initial review." Numbers in rows reflect informed conclusions based on database functionality at the time. We anticipate greater precision in tracking the "initial review" in 2021 due to upgrades to the database functionality. Numbers are classified.

#43--The CSB does not have any OGE-approved alternate forms.

In regards to Questions 41 and 42, one filer was on extended family medical leave and did not submit a Form 450 until the end of CY 2020 it was reviewed within 60 days, which took place during 2021.

N/A

Q41 If applicable, please explain discrepancies between the number of (450) reports required to be filed, and the actual number of reports filed: -There is sometimes a breakdown in communication in reporting who needs to be added or removed as a filer when they come on board or leave, or begin/discontinue duties that require filing. -Many offices had personnel turnover and a lack of oversight of their 450 programs during the gaps in personnel, which was compounded by the upheaval of the COVID-19 crisis. -Reports have been assigned in 2020 that were not due to be filed until 2021, or had extensions granted that moved their due date into 2021. -Filers repeatedly ignored requests to complete their reports, even when their supervisory chain was notified. -Filers deployed, departed, became ill, or had other serious life events, which interfered with their ability to file. -Disagreements over whether an employee should file happen, and the determination that the employee should not file is made, but the report is not always removed as it should be. Thus, the superfluous report continues to be reflected in the number required. -Particularly in situations where the filer has managed accounts, it can sometimes take time for them to gather all of their financial information from the manager, and that may push them into the next year if it is close to the end of the year. - Failure to update email address in FDM results in not receiving notifications that filing is required. -Some filers contested filing, and those matters were not resolved before the end of the calendar year. Q42 (part 1) If applicable, please explain why some (450) reports were reviewed more than 60 days after submission: -Supervisors failed to review and sign the report within 60 days, and FDM does not permit Ethics Counselors to certify in the absence of that review. -Pervasive issue with FDM not accurately and consistently including un-reviewed reports in the list of reports that require review. -Some New Entrants added less than 30 days before the end of the year, and, therefore, the submission due date and/or the certification due date extend beyond the end of the year, giving the appearance that more reports were filed than certified. -The volume of reports overwhelms undermanned teams, particularly when ethics is not their only portfolio. -There have been reorganizations that have resulted in filers being shifted without attorneys realizing it. -Some organizations had personnel shortages, and undermanned offices had particular difficulty recovering from the upheaval of the COVID-19

<p>crisis, making it difficult to review within 60 days. -Misunderstanding as to who was the reviewing official. -High turnover in some offices have made it difficult for new attorneys to come in and quickly turn over reports that were coming due for certification. -FDM recently changed some of the functionality, and now a certifier cannot mark a report as initially reviewed unless there are questions or amendments requested, so there is no way to account for the fact that there was an initial review that took place but the supervisor has failed to timely review. So, in some instances, the reports truly were reviewed within 60 days, but the system does not reflect that. -Occasionally, it was simple oversight. -Certifiers have been deployed, and back-ups are not in place, so the reviews do not take place within 60 days. -New entrant reports that are filed outside of the annual filing season are sometimes overlooked, as attention becomes diverted to other major timelines. -Prioritization of taskers/coverage for novel COVID-related matters. Q42 (part 2) If applicable, please explain why some (450) reports were certified or closed more than 60 days after submission (Checked "other (specify)": -For many filers, it was the first time filing in Integrity, and they were confused by the format, and some differences in instructions, which resulted in increased requests for additional information. -The COVID-19 shifts in duty location created widespread difficulties in accessing reports in a timely manner to respond to questions, and to certify the reports. - Turnover in staff and leadership, and other manpower deficiencies, overwhelm undermanned offices (even if temporarily undermanned). -There are two screens you must click through to certify, and if you are not careful to certify through the second screen, to confirm certification, the report will not be certified, though it was intended to be, and would have been, if not for the user error.</p>
<p>Q42: The agency certified more reports than it received in 2020 because one component was resolving a backlog of 2019 annual reports. Because of the partial government shutdown and staffing shortages, that component certified/closed approximately 3000 2019 reports in 2020. That component has cleared its backlog.</p>
<p>General Part 9 Comments: Due to the COVID pandemic, DOJ's responses to Part 9 reflect best estimates based upon the information available. The pandemic presented several challenges with respect to the confidential financial disclosure program because it necessitated, on short notice, maximum telework of DOJ personnel and increased workload on certain components. These changes caused disruptions in report assignment, submission, review, and certification processes, and ongoing difficulties tracking and gathering the information requested in this Part. Q42: In addition to the challenges presented by the pandemic, the report review and certification timeliness was not able to be precisely calculated in this manner, due to the decentralized structure of DOJ's confidential financial disclosure program. The response to Q42 reflects best estimates based upon the information available.</p>
<p>Questions 41 and 42: The difference in the number of reports filed in 2020 and the number closed in 2020 is the result of certain reports submitted at the end of 2020 and which were still under review and not certified or closed by December 31, 2020.</p>
<p>Q42: DO/HQ cannot be certain about numbers for the 60-day review and the accuracy of tracking. The DO OGE 450 e-filing does not have the capability to record an initial review date. This capability requires significant expense in modifying electronic form.</p>
<p>N/A</p>
<p>N/A</p>
<p>N/A</p>

Question 42 notes one more financial disclosure than is noted in question 41. One political appointee was appointed in late 2019, and their report was certified during this calendar year.
Question #41- Data not included/is classified Question #42- Data not included/is classified. Note: All confidential financial disclosure reports were reviewed within 60 days. A percentage was closed after 60 days for the reasons selected above.
Question 43: The numbers reported in this question are percentages, rather than numeric counts of extensions granted. Actual numbers are made available to cleared OGE personnel when required.
N/A
None
NA
n/a
Regarding questions 41 and 42: These numbers include 2019 New Entrant reports that were assigned after December 15, 2019 but due/filed after January 1, 2020. 2 New Entrant reports not due until January 2020 were filed early in December 2019, therefore, the 99 required/filed and 101 were certified by the agency in 2020. The 2 2019 reports filed at the end of 2019 were not reviewed/certified until CY2020.
43. All confidential filers were granted an extension due to a lack of sufficient staffing resources to initiate the reporting process in January-February 2020.
N/A
We are not able to compile this information, as we do not have access to the certified 450 forms due to Covid-based teleworking.

Question 47

Parts 1 and 2 of the OGE Form 202 were provided to OGE. Part 3 of the form is complete. However, we are evaluating how to transfer that appropriately to OGE.
Typically, DoD IG/Investigators submit OGE 202 as they make the referral to DoJ, usually without the knowledge of ethics counsel. However, it appears that due to changeover in personnel, this may not have occurred in this case. IG is still verifying whether a form was submitted, but if not, we will ensure that is corrected.
Form 202 to be submitted in February 2021.
Did not submit any referrals.
CEQ made no referrals to DOJ in 2020.
We had no referrals in 2020
No referrals were made.
No referrals were filed.
There were no referral(s) and disposition(s) of the referral(s) via OGE Form 202 (as required by 5 C.F.R. 2638.206(a))
No referrals sent.
Not applicable because no such referrals were made.
No Referrals or dispositions
No referrals were made.
There were no referrals.
We didn't have any referrals.
Not applicable because there were no need to submit referrals to OGE.

Part 10 Comments

N/A
Q45: It was ultimately decided that there was not sufficient evidence of a 18 USC 208 violation to warrant a DOJ referral. The employee was disciplined with a five-day suspension for the activity that brought 208 into question, and other charges accounted for in Q44.
In 2020, the ADAEO issued a policy mandating that Question 45 responses include only those reports of disciplinary action that were explicitly based on violations of ethics provisions.
Q.46: There are 3 cases pending with DOJ that were reported on the Department of the Navy's AEQ for CY2019.
Question 44. There were two investigations total. Of those two investigations, one of them involved alleged violations of both 5 CFR 2635 and 5 USC app. Section 104 or 18 USC section 1001. Same employee who violated outside activity in 502.
Question 47: Please note that the Department's Office of Inspector General sent three additional notices of referrals to OGE in 2020 to provide notice of referrals made in prior years.
46) The case pending a determination has been returned to the Office of Inspector General, but has not yet been referred back to the component for action.
N/A
N/A
N/A
Question 46 Per the Counsel to the IG: "We submitted two OGE 202 part II forms for cases that concluded in 2020, but for which the DOJ referrals were made prior to 2020 (both cases were ultimately declined in 2020 - one was referred to the agency and is pending disciplinary action, and in the other case the employee left the agency during the investigation)." The DAEO received one OGE 202 Part III during 2020 and submitted the completed form in January 2021 after the agency proposed disciplinary action.
Question #46 - Referred case involved 18 USC 207 so no option for disciplinary action to former senior employee. However, in light of remaining post-government employment (PGE) restrictions, corrective action was considered and implemented by Agency DAEO providing direction and counseling on PGE matters to the former senior employee.
N/A
None
NA
n/a
N/A

Question 49 Table 1 (did not sign)

One political appointee required to sign the Trump pledge, inadvertently given the Obama pledge to sign. Due to maximum telework we were unable to confirm other two ethics pledges were signed at this time.
Mistakenly thought employee had signed at his prior agency. Discovered after Pledge had been rescinded by prior administration.
No record of having received a signed copy
The Ethics Office was not provided with information about non-career staff hired by the OCEO. For this reason, the Ethics Office was not able to administer the Pledge requirement.

We have no information about who did or did not sign the pledge and have no way to obtain such information or complete this section of the survey.

Question 49 Table 2 (not required to sign)

N/A
NA
n/a
#1. After being Presidentially Appointed and Senate Confirmed, Sean W. O'Donnell, was sworn in as the Inspector General of the U.S. Environmental Protection Agency on January 27, 2020. His ethics pledge was handled through EPA GC/DAEO. Mr. O'Donnell joined the DoD OIG on April 6, 2020 after being appointed to concurrently serve as Acting DoD IG. While Mr. O'Donnell leads DoD OIG, his ethics obligations are managed by EPA GC/DAEO.
N/A. Please note that two appointees transferred from other agencies without a break in service but ethics officials were unable to obtain a copy of their signed pledge, so they re-signed upon appointment to the Department.
N/a
N/A
N/A
See above

Question 49 Table 3 (explain discrepancies)

N/A
NA
n/a
One signed the Obama pledge. Due to maximum telework we were unable to confirm other two ethics pledges were signed at this time. Seven transferred from other agencies where the ethics pledge was signed.
N/A
N/a
N/A
Mistakenly thought employee had signed at his prior agency. Discovered after Pledge had been rescinded by prior administration.
Not required to sign the pledge because appointed without a break in service after serving in another position for which the Ethics Pledge was already signed.
N/A
NA
See above

Question 51

Not applicable
N/A
NA
N/A
N/A
N/A

N/A
There were none.
N/A
N/A
N/A
NA
N/A

Question 53

No enforcement actions were taken since no violations occurred.
No violations or enforcement actions.
Not applicable - no violations.
N/A
There were no violations.
None taken.
N/A
none
N/A
0
There were no violations of the ethics pledge, therefore no actions were taken.
N/A
N/A
There were no enforcement actions taken.
None / NA
N/A
n/a
N/A
No enforcement actions were taken because there were no violations.
There were no violations of the ethics pledge that required enforcement action.
N/A
Not Applicable
N/A
None
None. AS STATED ABOVE WE HAVE NO PAS EMPLOYEES SUBJECT TO THE PLEDGE
N/A
N/A No employees at DFAS were required to sign the ethics pledge
N/A
N/A.
N/A
None
N/A
No enforcement actions taken as there were no violations.
There were no enforcement actions taken in 2020
N/A

none
NA
n/a
N/A
There were no enforcement actions taken in 2020 as a result of pledge violations.
None
none
No violations of the ethics pledge in 2020.
None.
N/A
N/A
No violations
No, violations of pledge
There were no violations of the Pledge.
N/A
N/A
N/A
na
we have nothing to report.
N/A
No violations of Ethics Pledge reported
N/A
N/A
N/A
N/A
N/A
N/A
N/A
n/a
N/A
N/A
None.
N/A
None
N/A
There were no violations of the Ethics Pledge during 2020.
There were no violations of the Ethics Pledge during 2020.
N/A
n/a
N/A
N/A
There were no enforcement actions taken in 2020 as a result of violations of the Pledge
There were no enforcement actions
There were no violations - see answer to question 52.
N/A
There were none

None
None
Not Applicable.
N/A
N/A
There were no violations and no enforcement actions taken.
N/A
N/A
NA
No enforcement actions took place.
There were no violations in 2020
None
N/A
n/a
N/A
n/a
No Violations
n/a
N/A
n/a
n/a
None
No violations occurred in 2020.
N/A
There were no violations of the Ethics Pledge in 2020.
none n/a
N/A
N/A
N/A
NA
NA
N/A
N/A
N/A
N/A
None.
N/A
N/A because we are so small
We have had no violations in 2020 or any previous year.
NA
No enforcement actions were taken.
N/A
None necessary because no violations.
NA
There were no violations, and therefore no actions necessary.

N/A
n/a
Not Applicable.
N/A
N/A
N/A
N/A
N/A
N/A
N/A
No known violations
We are aware of no pledge enforcement actions taken by USAGM in 2020.
N/A

Part 11 Comments

N/A
Q.50 - the ethics office does not track this data.
Q. 49. DHS had two PAS confirmed in 2020. One was already a PAS official but confirmed for a new position so he did not need to sign the Pledge anew. One was appointed in a different capacity prior to confirmation to a PAS position and thus had already signed the Pledge.
Question 52: The DOI Office of Inspector General (OIG) issued reports in 2020 that described instances where certain DOI employees did not comply with the requirements of the Ethics Pledge. Please see the OIG’s website at www.doioig.gov for additional information.
N/A
N/A
N/A
N/A
N/A
NA
N/A
N/A
NA
n/a
N/A
We have inadequate information to complete question 52.

Question 55

SGE's were sent training platform but did not complete the training.
One SGE was unable to complete ethics training within the 3-month deadline because he joined the Biden/Harris Presidential transition team and was barred by their Ethics Policy from speaking with the CFTC. Upon completion of his transition duties, he will complete ethics training.
One FACA never met in 2020.
A FACA board DFO mistakenly believed that another agency was overseeing the IET requirement for the Presidential appointees to the board.

OSD is continuing its efforts to revise the FACA process, particularly for identifying members due for renewal and ensuring that ethics requirements are met at that time. A revision to the DoD FACA Instruction is in process and several changes have been made to appointment and renewal processes.
These members were appointed after the first meeting was held.
Some new SGEs have not completed the IET yet one SGE is on medical leave. SGEs who have not completed IET did not participate in agency business.
Administrative error
Due to the COVID-19 pandemic, the CY 2020 training sessions for the OSHA SGEs were cancelled for the 1332 OSHA SGEs. Since this program requires onsite reviews and none would be conducted in CY 2020, OSHA decided to cancel the training.
For most SGEs who received IET after the first meeting of the year, the delay was due to a misunderstanding of the regulatory requirements for SGEs appointed to multi-year appointments resulting in delivery of annual ethics training by the end of the calendar year. In addition, ethics officials were unable to provide training to a number of SGEs and are working with staff at the Department to address this challenge going forward.
The three that did not receive the training have not participated in any activities with the committee for several years.
One SGE was late in undertaking their ethics training and submitting a certification of completion.
OMB had one SGE that was considered an SGE on 1/1/2020, but never served or did any work during 2020. During 2020 her SGE status was terminated.
The 2 SGEs are the same people and have been on the Commission for more than their 5-year term and receive annual ethics training every year.

Question 56

Two are new members on-boarded later in the year (one of them has finished his particularly long and complex filing it is awaiting his signature). And the third one is a member whose home and tribe has been affected by the wildfires in California and COVID. I expect to have financial disclosures from all three within a month.
One Board member was unable to file a Form 450 due to serious medical issues/extended hospitalization. In light of this, the DAEO provided an open-ended extension until the SGE's health improved sufficiently to resume official duties and prepare disclosure report.
In 2020, the Commission had 463 FACA SGEs. All of them should have completed and submitted Form CCR 17, but instead, only the FACA SGE's sitting on State Advisory Committees that took up new projects were required to complete financial disclosure forms. Those FACA SGEs (95 total) were given the Ethics Project Certification Checklist in place of Form CCR 17. Thus, because not all State Advisory Committees selected new projects in 2020, only a subset of the total (95 out of 463) were required to fill out the form. Of the 95 who were required to complete the Ethics Project Certification Checklist, 80 returned their completed forms to the Regional Programs Manager.
The SGEs on the FACA committees are appointed for multiple years but serve less than 60 days each year. On the anniversary of their appointment the SGEs are required to file a new entrant OGE-450 and repeat ethics training. One FACA SGE resigned before filing the OGE-450 on his anniversary. Six SGEs completed their subcommittee work prior to the time for filing however, the Federal Designated Official ("FDO") for the committee was unable to

determine whether the six SGEs would be needed for the next meeting. While this decision was pending, the Ethics Office granted filing extensions to the six FACA SGEs. Via email dated January 6, 2021, the FDO notified the Ethics Office that the consulting services of the six FACA SGEs were no longer required and would not be returning to the committee. Therefore, the six SGEs OGE-450 reports were no longer required.
This was an oversight and failure to assign the SGE a report. He worked a total of 40 hours last year as a Senior Mentor. The error is currently being corrected.
Despite repeated filing notices and follow ups from OE leadership, some SGEs failed to complete their OGE 450 reports as required.
One SGE joined the Advisory Committee late and did not file. Another report was lost in the mail. Other members did not participate in meetings in 2020.
Problems obtaining information from the filers.
3 SGEs were granted extensions.
OSD is continuing its efforts to revise the FACA process, particularly for identifying members due for renewal and ensuring that ethics requirements are met at that time. A revision to the DoD FACA Instruction is in process and several changes have been made to appointment and renewal processes.
2 independent board members were not compliant.
Three reports filed in 2021, remaining reports following up with DFOs.
SGEs who have not filed reports were not permitted to participate in any agency meetings or business.
One FACA field reports in December 2019, with change of DFO and ethics attorney, there was a miscommunication and the December 2020 reports were not collected but are currently being collected. The advisory committee was effectively inactive for much of 2020, in part, resulting in this discrepancy.
Due to COVID, 3 people were unable to submit their reports. Collection is underway.
These three filers were reminded repeatedly to submit their financial disclosure reports, but failed to do so.
The discrepancies are a result of a breakdown in coordination, communication, and tracking for SGEs. In 2020, the DEO revised the process for appointing SGEs and now requires financial disclosures upon appointment.
One FACA member's responsibilities ended prior to them submitting an OGE 450 report. A second SGE previously on inactive status began work after 11/1/2020 and did not file within 30 days. The supervisor was contacted, and the report was received in early January 2021. A third filer attempted to submit an Adobe digital signature and did not have a PIV card for a digital signature. The component notified the filer to submit a "wet signature," but mail delays and the pandemic have delayed receipt of the 450. The non-signed report has been reviewed and no conflicts were identified.
One bureau did not receive 4 reports this year. Please note that the subpanel for which two of these members participate did not meet during CY 18, 19 nor 20. After repeated attempts and reminders two active panel members never submitted the form.
The 55 SGEs whose reports were not filed were on committees that did not meet.
One office reported that three former confidential filers returned to their office under the "emeritus" program as SGEs. The DEO did not realize that they had to file the EPA 3110-48 as SGEs.

The individual who did not file was an SGE serving on a board that did not meet in 2020. The individual informed the FLRA that he had filed a Form 450 for another agency before the pandemic hit, that it was in his office, and that he would send the FLRA a copy of that report when he returned to his office. He did not return to his office by the end of 2020.0
Two FACA Committee SGEs did not file a report due to medical and technical issues, but will do so before their first meeting in 2021. The status of one expert/consultant who did not file in 2020 is being reviewed.
Although NSF has years of experience running virtual panels, NSF Directorate AC meetings are always in-person. The pandemic moved these meetings to virtual, resulting in instances of collection, review, and certification delays. 12 AC reports were filed and saved on a program assistant's r:drive. NSF is migrating all staff to one drive, and staff were instructed to move documents from r: drive to one drive. The assistant left NSF prior to moving her r:drive. Upon departure, NSF subsequently wiped out her r:drive. The DFO is working with IT to restore the information. One advisory committee staff member requested five alternate disclosure reports which were not received. Two alternate disclosure forms were not filed were due to administrative staff error. Because the alternate disclosure form is a paper only form, AC members without printers or scanners were challenged in completion and submission of the forms. The Ethics Team has requested IT to find an electronic solution.
Question 56: The numbers reported in this question are percentages, rather than numeric counts of SGE filers. Actual numbers are made available to cleared OGE personnel when required. Financial Disclosure Reports were filed by all NSA SGEs that were expected to perform any duties for the Agency in the 365-day period.
One confidential filer's report was in draft form when the filing period was closed and the draft report did not save. We are working with the filer to resubmit the 2020 report.
Public Reports: The filer rejoined the agency soon after her departure and was not notified to file a new-entrant report. We are still working to determine what, if any, financial disclosure report she may be required to file.
Our building has issues receiving mail. SGEs are encouraged to ALWAYS use FedEx with a tracking number. However, of the 4 reports missing, Members say they sent them but we never received them at our building. The 4 missing reports were initially granted extensions until 3/15/2020. This was at the start of the pandemic and their CFDs, if sent, never made it to the Commission office. All 4 have said they initially sent in the CFD. Copies have been requested but not yet received.
One SGE has not responded to requests for the report. The DAEO will continue to try to contact the SGE.
N/A

Question 57 Why not review timely

Prior to onboarding with the CFTC, one (1) SGE filer submitted his new entrant OGE-450. Despite numerous requests from the Deputy Ethics Official reviewing his report, the filer did not timely provide responsive information regarding assets contained in his OGE-450.
At current staffing levels, each financial disclosure reviewer in the Office of Ethics is responsible for reviewing an average of nearly 900 OGE-450 reports each year, in addition to providing ethics advice and training to their clients (OE advisors perform all three functions.) This large report volume combined with a large client population (~5,000 employees per advisor) makes 100% timely review of reports very challenging. With a ratio of only 1 Ethics

Officer for every 5,000 USDA employees, USDA's Office of Ethics is one of the least resourced Ethics Offices of any Executive Branch Department.
<ul style="list-style-type: none"> •Tracking was difficult due to the upheaval during the transition to full time telework status. •SGE filings tend to be out of sync with annual filers, and can therefore slip through the cracks, particularly in undermanned offices.
One DDAEO organization reported delays due to staffing issues/turnover.
There were some technical difficulties related to changes in submission procedures due to COVID-19, some offices experienced delays due to staffing changes, and some pending reports are still within the review timeframe.
One paper filed report could not be certified until someone went into the office. The report was filed in early 2020, right before the home quarantining started. End initial review and legal advice was provided within the regulatory timeline.
#57b and c. Some reviewers were waiting on additional information from filers. Reviewers were experiencing difficulty in getting filers to response promptly to their requests. In one particular case, the filer had to be mailed the documents due to the pandemic. Since he did not have computer equipment at his home this made reviewing and certifying within 60 days difficult. In addition, since this office reviews all financial disclosure reports, the workload of the staff was another reason why all reports did not meet the 60 day review and certification timeline.
N/A
Delays were due to evacuation orders as a result of the pandemic.
na
N/A
One SGE mailed paper copies of his report to our office at a time when all staff members in the office were working remotely. He included with his report paper statements of all of his and his wife's financial holdings (including items he was not required to report). Once members of our office began working in the office some days during the week we were able to review and process the documents, including redacting information from those documents that were not relevant to the conflicts review.
N/A
FACA - Intermediate review was conducted by the committee Designated Federal Officer (DFO) after the 60 days, so the reports were not certified within the 60 days. One committee had a change in DFO during the filing season which caused additional delay for that committee. Some required additional information. Two expert/consultant reports did not get reviewed within 60 days.
The reports were received in a timely manner and initially reviewed for ethical issues prior to closure of the NCPC office due to the covid pandemic. Upon initiation of a mandatory work-from-home order by the Executive Director in early March, the reports were left in locked file cabinet drawer in the office and could not be retrieved until early May when staff was again allowed back in the office for a limited period of time. Once retrieved, all reports were again reviewed and certified.
Review and certification issues were the result of untrained admin staff, untrained DFO designees, and problems signing a non-fillable form. For example, NSF did not initially allow staff to connect our government laptops to personal printers, and the building was closed to all staff. Since these are confidential forms, they could not be sent to an unsecure personal accounts to be printed on a personal computer. This delayed certification of forms. We believe

the corrective measures outlined in the additional comments for Section 12 will address many of these issues.
The numbers reported in this question are percentages, rather than numeric counts of reports reviewed. Actual numbers are made available to cleared OGE personnel when required. The reduction in NSA staffing (see comment for Question 18) occurred shortly after the 2020 annual filing deadline for OGE450 reports. During this time, OGC ethics officials did not have access to NSA's internal filing system to complete reviews of reports filed. The ethics team did not fully return to the office until the end of July. Thus, most reports filed before that date were not timely reviewed. In addition, once ethics officials did return to the office, there were immediate and increased demands resulting from COVID-19.
Ethics staff member shortages.
As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports. In addition, we are now implementing the use of an electronic financial disclosure management system to improve this aspect of our ethics program going forward.
None
N/A
N/A
N/A
Some reports were not available after the pandemic was declared because they were in hard copy. Also, agency resources for completing reviews has been difficult. Both SGE reports have been certified as of date of questionnaire.

Question 57 Why not cert timely (other)

Three reports were certified a few days after the 60 day deadline due to extended leave of the ADAEO.
Due to COVID-19, there were difficulties moving paper forms between reviewers and some technical difficulties related to changes in submission procedures. Some offices experienced delays due to staffing changes, and some pending reports are still within the review timeframe.
See above
Due to COVID-19 Pandemic, delayed transmission to certifier.
See the response above.
pandemic
na
Due to transitioning to all remote work in March 2020 under COVID-19 restrictions and determining what was available electronic, certification was delayed for an additional 6 days beyond the 60 day deadline.
All four SGE financial disclosure reports were timely submitted, received and reviewed (within 60 days). An administrative error occurred as the reports were being finalized, which resulted in our failure to certify three of the reports immediately after the review (we recently realized this error and all four reports are now certified).
One SGE mailed paper copies of his report to our office at a time when all staff members in the office were working remotely. He included with his report paper statements of all financial holdings he and his wife possessed (including items he was not required to report). Once members of our office began working in the office some days during the week we were able to

review and process the documents, including redacting information from those documents that were not relevant to the review.
N/A
A senior ethics attorney who worked with many of the FACA committees left the agency at the beginning of the COVID-19 pandemic response, and the position was not backfilled for several months.
The reports were received in a timely manner and initially reviewed for ethical issues prior to closure of the NCPD office due to the covid pandemic. Upon initiation of a mandatory work-from-home order by the Executive Director in early March, the reports were left in locked file cabinet drawer in the office and could not be retrieved until early May when staff was again allowed back in the office for a limited period of time. Once retrieved, all reports were again reviewed and certified.
Review and certification issues were a result of untrained admin staff, untrained DFO designees, and problems signing a non-fillable form - e.g., Initially, NSF did not allow staff to connect our government laptops to personal printers, and the building was closed to all staff. Since these are confidential forms, they could not be sent to an unsecure personal account to be printed on a personal computer. This delayed certification of forms. We believe the corrective measures outlined in the additional comments for Section 12 will address many of these issues.
See above explanation of the reasons why some reports were not reviewed within 60 days.
N/A
As noted above, we have a human capital issue. There is only one attorney reviewing these, and they have significant additional duties outside their ethics responsibilities. We are working to better prioritize a timely review of these reports. In addition, we are now implementing the use of an electronic financial disclosure management system to improve this aspect of our ethics program going forward.
N/A
Reports filed are approved alternative 450 reports and were filed as hard copies in March 2020 prior to an implementation of 100% telework of non-essential staff. The reports could not be converted to electronic scanned copies for electronic review/final signature until after 60 days from receipt.
N/A
N/A
See above response.

Part 12 Comments

Q56: ACUS SGE's are not required to file the Form 450 or 278e. They are required to notify the chairman of any financial or other conflicts of interest based on the requirements outlined in ACUS's bylaws.
Question #54: Of the 15: 6 were SGEs who were replaced during 2020 6 were their replacements 1 came into a slot that had been vacant for years and 2 were SGEs that were retained.
USADF had no new Board Members in CY2020 for the purposes of Initial Ethics Training, however all five (5) USADF Board Members received their annual training in CY2020. This USADF-created training specifically for its Board Members focus on the Board Members

ethics duties and the ethics issues the Board Member of a nonprofit/development agency may encounter. USADF has no other SGEs for the purposes of Part 12.
N/A
There is a delta between the total number of SGEs in 2020, and the number of reports required and filed, despite the fact that there were no SGEs that were exempt from the filing requirement. This is because there were SGEs that departed service before their next report was due, and therefore, they were not required filers.
Q.54-56: One FACA and two subcommittees did not have appointed SGE members in 2020. Q. 58: There are 12,794 reserve officers that are excluded from the SGE financial disclosure filing requirement unless their job duties require that they complete an financial disclosure report.
Q58: One component maintains a pool of SGEs ready to serve on FACA committees. Beginning in 2020, these SGEs are exempt from confidential financial disclosure filing requirements until they are actually placed on a committee. This explains the increase in exempt SGEs. Other exempt SGEs are primarily employed through the National Disaster Medical System to respond to major disasters.
Please note all four (4) SGE were new appointments in CY20 and members of a FACA Advisory Committee
N/A
N/A
N/A
#56(f) - IMLS, as a federal grant -making agency, operates a peer-review system. Peer-reviewers, as SGEs, complete ethics training and submit an OGE approved conflicts of interest form.
#60: Our Agency determined that the 15 Advisory Council members are not required to submit a Form 450, however we provide them with an annual ethics certification letter which they must sign indicating they are aware of ethics requirements under 18 USC 208, 203, and 205
Question 55 PIDB did not have enough members to operate until late in the year, so training not provided during the calendar year to new SGE board members.
Please see comments to Part 5 for a breakdown of agency SGE committees.
#56 We have taken the following actions to correct these issues: 1. NSF CMO, FACA attorney, and the Office of Integrative Activities were notified. 2. Division of Information services is converting the alternate 450 to an electronic format. 3. A checklist for support staff - step by step instructions on what needs to be done to run an AC meeting was drafted by CMO, FACA attorney, and ethics staff. 4. The ethics team will be notified of all federal register notices of upcoming AC meetings to allow timely reminders of the COI requirements. 5. A training session for support staff and DFOs NSF-wide will be held prior to spring AC meetings.
54.-57. The numbers reported above are percentages, rather than numeric counts of filers. Actual numbers are made available to cleared OGE personnel when required.
Please note that there is an error in #55a that the system would not let me correct. That should be a 0.
58. Two of these excluded filers had already completed annual 450 reports for their previous, full time positions.
N/A

None
Extensions were for late 278-T filings listed in 278e. 278e filings not late.
NA
n/a
For question 61, filing extensions are necessary to coordinate submission of reports for in-person meetings. This was the regular practice prior to COVID-19. Extensions are also needed for the additional time required to coordinate through a Designated Federal Officer with appropriate instructions.
N/A

Overall Comments

Most of this questionnaire remains irrelevant to a nano-sized agency like the USARC, and it's an administrative burden to complete it each year. I would prefer to respond to a questionnaire written expressly for small agencies.
N/A
This year has been exceptionally challenging due to the COVID-19 pandemic, which is reflected in some of the fluctuations in our data. However, we believe that the talented and dedicated ethics counselors and support staff throughout the Air Force have done a commendable job keeping the program on track despite the upheaval. We are constantly moving towards improvement, and we appreciate OGE's assistance and guidance in running the most effective ethics program possible.
In calendar year 2020, the DOI ethics program has continued its efforts to improve the efficiency, consistency, and accountability of the ethics services provided to all DOI employees in every Bureau and Office. To that end, the Department has increased regulatory compliance for public and confidential financial disclosure collection and review improved regulatory compliance with initial and annual ethics training, including improvements to delivering training for temporary and seasonal employees and taken steps to improve ethics services to special Government employees.
N/A
N/A
N/A
The Arts Endowment is a mandatory telework agency. As such, ethics staff were unable to view Arts Endowment paper files during the preparation of this year's questionnaire. While we have confidence in the accuracy of our electronic records, cross-checking those records against paper records is a standard part of our annual review under normal circumstances to ensure validity. Upon a return to an in-office work environment, we plan to cross-check our electronic records against our paper records and promptly communicate any discrepancies to OGE.
1. Please be more consistent with the "explanation" and "additional comments" box sizes. Having half a box with only a few visible lines for the "explanation" box hampers my ability to track the explanation - especially when interrupted. 2. Please change the due date of the report. The original due date did not interfere with the annual confidential report requirement because they were due September 30 each year. Sending out the requirement, keeping up with review, and gathering information from 40+ offices to complete the report is a strain on resources. When the year is also a transition year, it is extraordinarily difficult for many agencies. 3. Please provide a "save" button that does not require that I close out the form - and

keeps track of where I am - so that I do not have to constantly get out of the document just to save it. I would suggest imbedding a save button with each heading - so that we do not have to scroll down to the bottom to save the content. 4. Add a "questionnaire check" workflow, so that individuals who are inputting the information for review by their supervisor can run a check to determine if they have missed completing anything. This is a LONG questionnaire, and when you have to coordinate and receive information from 40+ offices, it is very easy to skip over a question for which you have not received all of the required information.
N/A
None
NA
n/a
N/A
Effective January 1, 2020, the Overseas Private Investment Corporation (OPIC) transferred all of its rights and obligations to the United States International Development Finance Corporation (DFC) under the authority of the Better Utilization of Investments Leading to Development (BUILD) Act of 2018, 22 U.S.C. § 9601 et seq. As a part of this process, all OPIC personnel transferred to DFC. Accordingly, readers should be aware that when comparing OPIC's 2019 numbers with DFC's 2020 numbers, the second set belongs to a separate and new agency.

Addendum

This report was revised on August 31, 2021, as follows:

Section 2 – Key Highlights

- Page 5, second paragraph. The original version incorrectly stated that the President declared a national emergency in 2021. The sentence now correctly refers to 2020.
- Page 6, the Financial Disclosure section heading now has the blue heading background, consistent with the other headings in the section.

Throughout

- Minor spacing corrections made in several locations.
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This report was revised on January 10, 2022, as follows:

Section 2 – Key Highlights

- Starting on the bottom of page 8, the bulleted list regarding training compliance was updated to more clearly state which types of SGEs were excluded for each metric.