



# *Ethics Program Reviews*



# *Review Measures*

- **Compliance**
- **Compliance+**



# *Additional Documents*

- **Available from the Office of Government Ethics**
  - **Checklist of Ethics Materials**
  - **Tips on Preparing for an Ethics Program Review**



## *Review Elements*

- **Enforcement**
- **Ethics Counseling**
- **Ethics Training**
- **Financial Disclosure**
- **Ethics Agreements**
- **Special Government Employees**



# *Enforcement*

- **Agency's system of enforcement**
- **Roles of ethics officials/OIG/other investigative offices**
- **Notification to OGE of referrals to DOJ/U.S. Attorney**



# *Ethics Counseling*

- **Counseling reviewed by OGE Desk Officer**
- **Accuracy – is the analysis correct?**
- **Timeliness -- self-evident**
- **Transparency – yes/no answer vs. analysis?**
- **Accountability – written responses?**
- **Consistency – Are you ensuring multiple responses to the same question are answered in a similar fashion? Coordination?**



# *Ethics Training*

## ■ **Initial Ethics Orientation**

- **May be many employees only exposure to the ethics program. IEO should not trivialize the importance of the ethics program.**

## ■ **Annual Ethics Training**

- **May be only continuing exposure to the ethics program that covered employees may have. Are you reinforcing criminal provisions? Highlighting recent headlines/prosecutions?**



# *Ethics Training*

## ■ **Model Practices:**

- **In person initial orientation/annual ethics training**
  - **Tracking systems**
  - **Annual ethics training provided to > covered employees**



# *Financial Disclosure*

- **Have written procedures been developed**
- **Have reports been collected and reviewed timely to ensure timely detection/prevention of ethics issues**
- **Have potential conflict-of-interest issues raised on reports been appropriately resolved**
- **Have reviewers been sufficiently trained**



# *Financial Disclosure*

## **Model Practices:**

- **Tracking system to monitor collection, review, and certification of reports**
- **Notifying filers when their reports have been reviewed and certified**
- **Developing a checklist and other review aids to standardize the review process**



# *Ethics Agreements*

- **System for ensuring employees have complied with ethics agreements**
- **Whether waivers have been properly granted**
- **Whether disqualifications have been properly structured**
- **Whether divestitures/resignations have been properly carried out**



# *Leadership Initiative*

**Commitment and action by agency leadership is the keystone for:**

**Ensuring the integrity of an agency's ethical culture**

**Fostering public confidence in the decision-making processes of Government**



# *Leadership Initiative*

## **Concrete Leadership Actions:**

- **Inviting ethics officials to participate in senior staff meetings**
- **Participating visibly in ethics-related events, such as annual ethics training**
- **Making announcements and speeches that reinforce the importance of ethics**
- **More concrete leadership actions can be found on OGE's Web site at:**

**[http://www.usoge.gov/ethics\\_docs/agency\\_model\\_prac/li\\_concrete\\_actions.pdf](http://www.usoge.gov/ethics_docs/agency_model_prac/li_concrete_actions.pdf)**



# *OGE Initiatives*

- **Report: Elements of a Successful Financial Disclosure Program. On OGE's Web site at:**

**[http://www.usoge.gov/ethics\\_docs/office\\_agency\\_prog/prd\\_rptfocused\\_0309.pdf](http://www.usoge.gov/ethics_docs/office_agency_prog/prd_rptfocused_0309.pdf)**

- **Self-Assessment**
- **Succession Planning**
- **Executive Order 13490 (Ethics Pledge)**



# *Wrap-up*

**Questions?**



**Thank you!**