

# A Vision for Ethics Program Management: *Benchmarking Success*

Karen Rigby

Jack MacDonald

Jorge Guzman

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



Preventing Conflicts of Interest  
in the Executive Branch

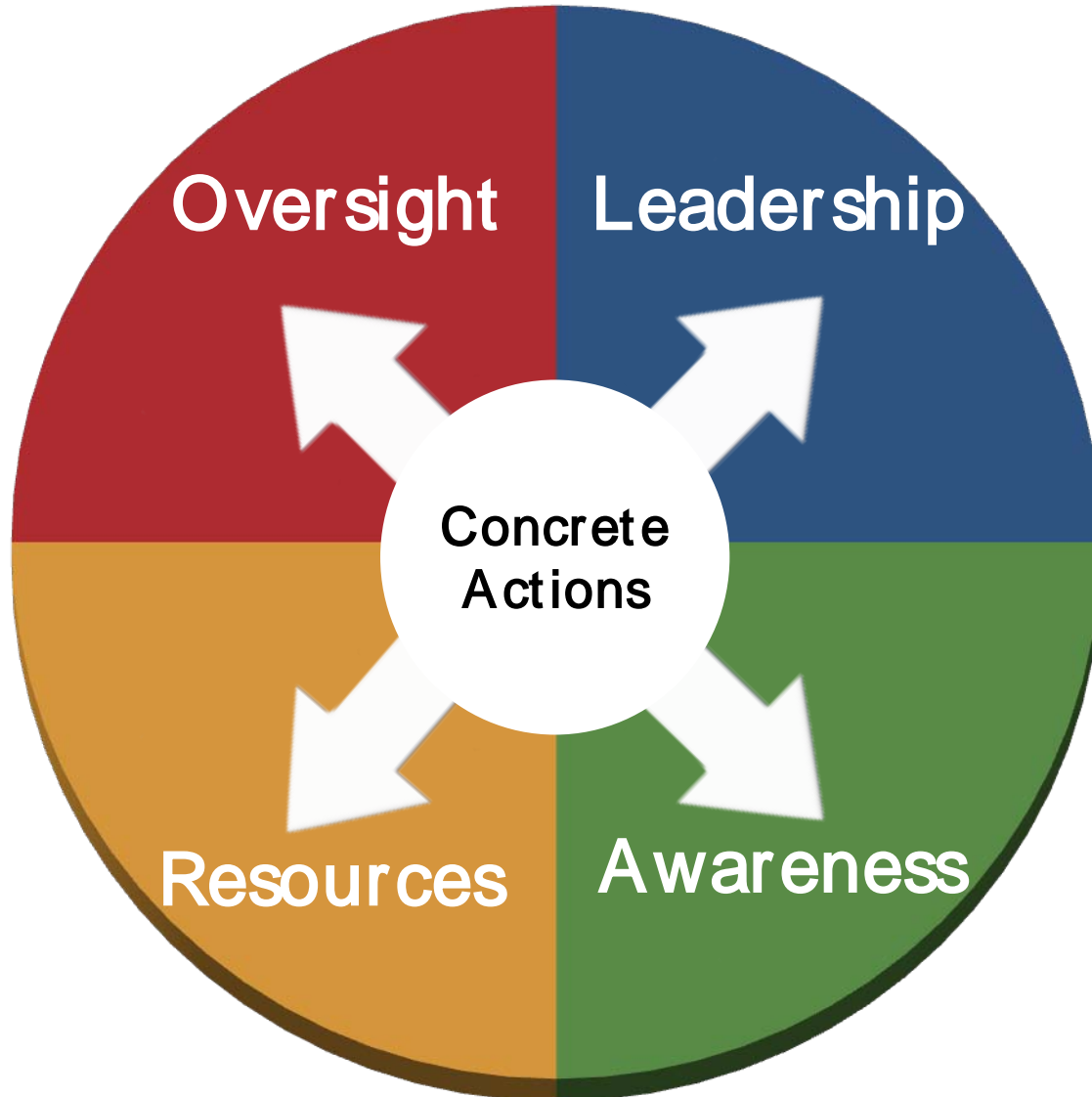
# Agenda

- I. Introduction and History of OGE's Benchmarking Projects
- II. What Do the Cabinet Agencies Look Like?
- III. Categories of Concrete Actions Taken by the Cabinet Agencies
- IV. What Do the Regulatory Agencies Look Like?
- V. Categories of Concrete Actions Taken by the Regulatory Agencies
- VI. Audience Self-Assessment Survey and Discussion

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

# Successful Ethics Program



# Self-Assessment Rankings

## Level 1

- Concrete actions are not taken or inconsistently taken to address the success factor.

## Level 2

- Concrete actions are consistently taken to address the success factor in one or two program elements, but not all three.

## Level 3

- Concrete actions are consistently taken to address the success factor in all three program elements.

# Benchmarking Projects

Developed Self-Assessment  
Questionnaire

Distributed Self-Assessment  
Questionnaire

Conducted Interviews and  
Compiled Data

Analyzed Results

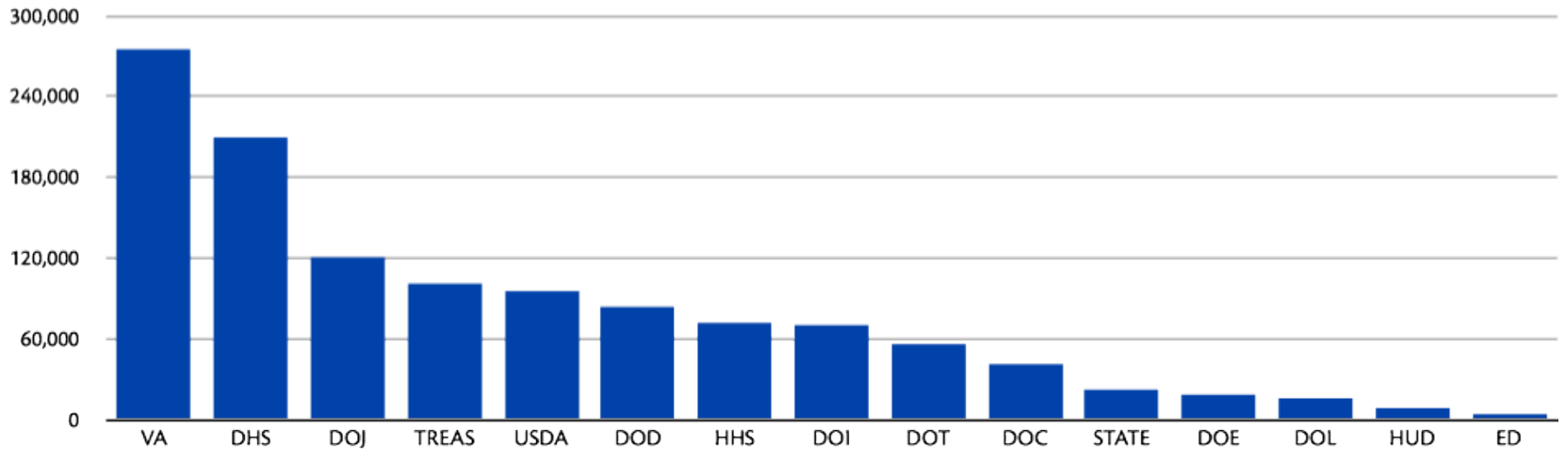
Issued Report

Consulted with Agencies

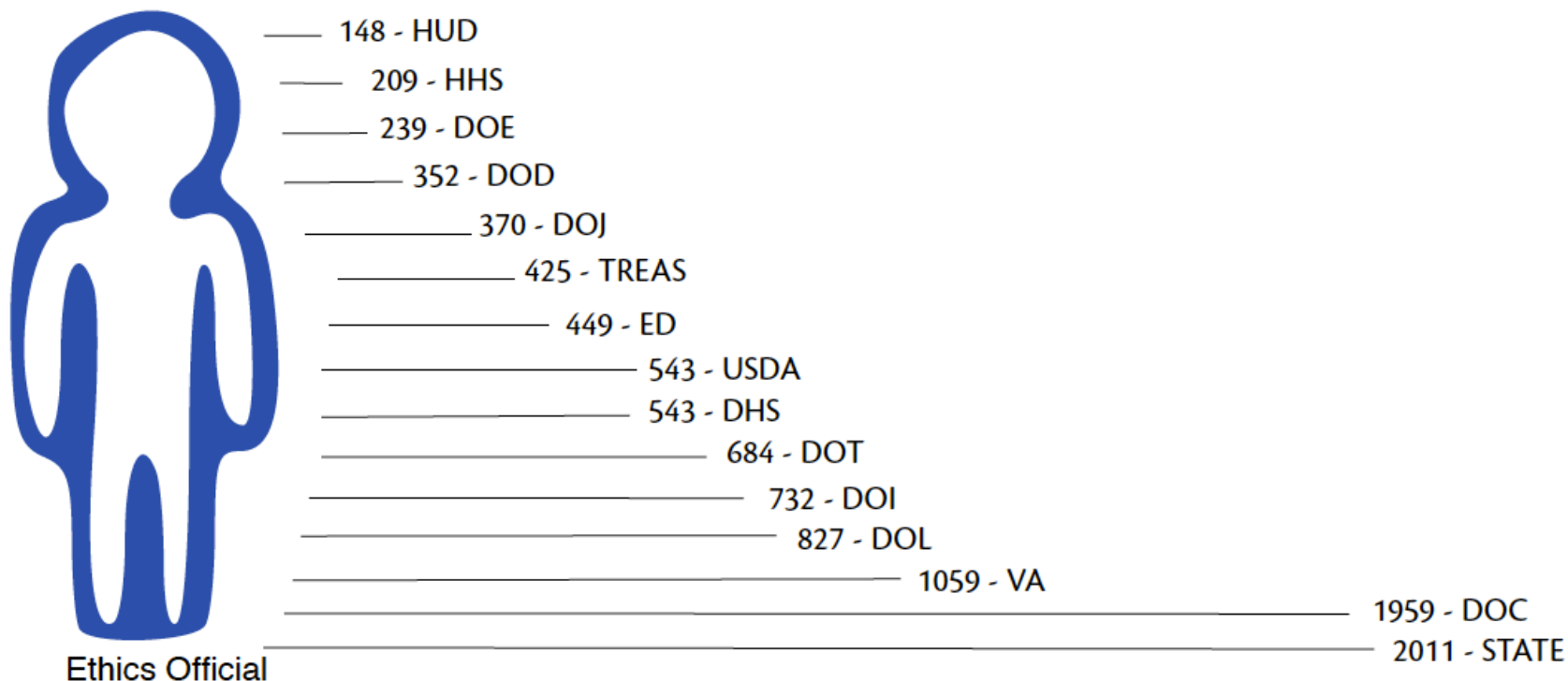
# What do the Cabinet Agencies Look Like?



# Number of Full-time Employees

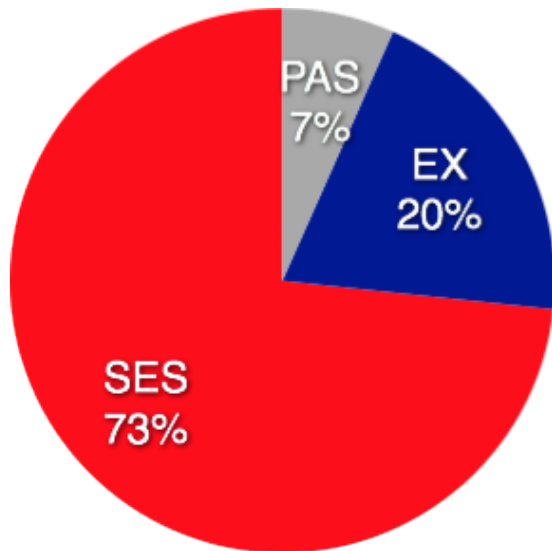


# Number of Employees per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)

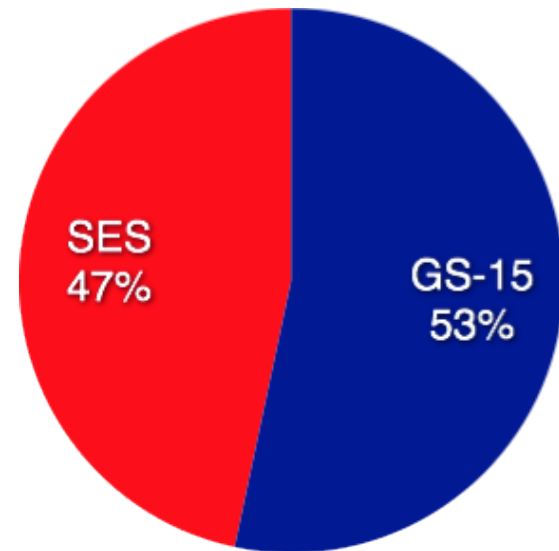




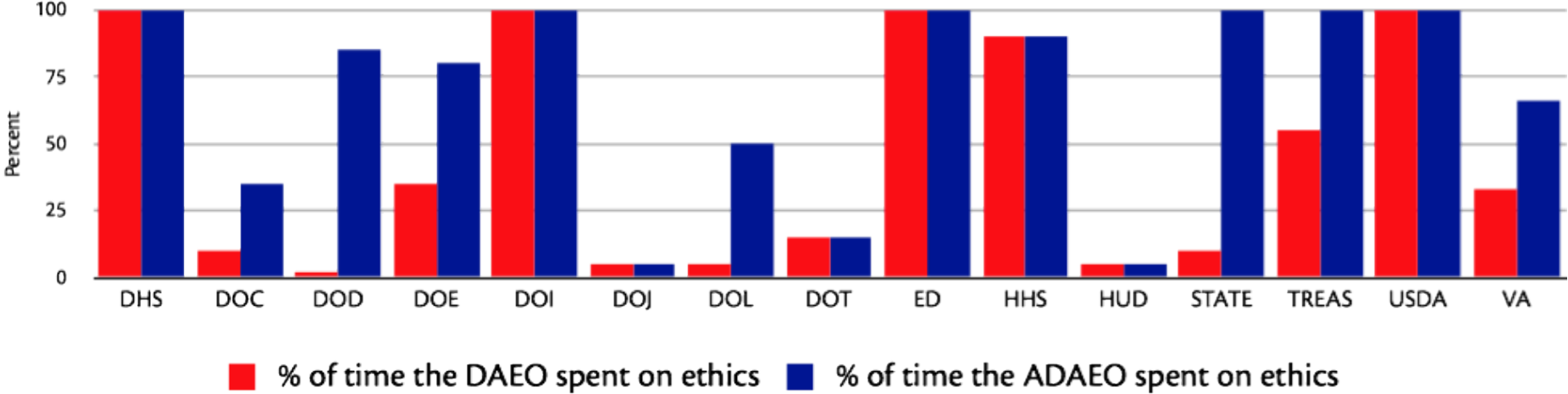
DAEO' s Grade Level



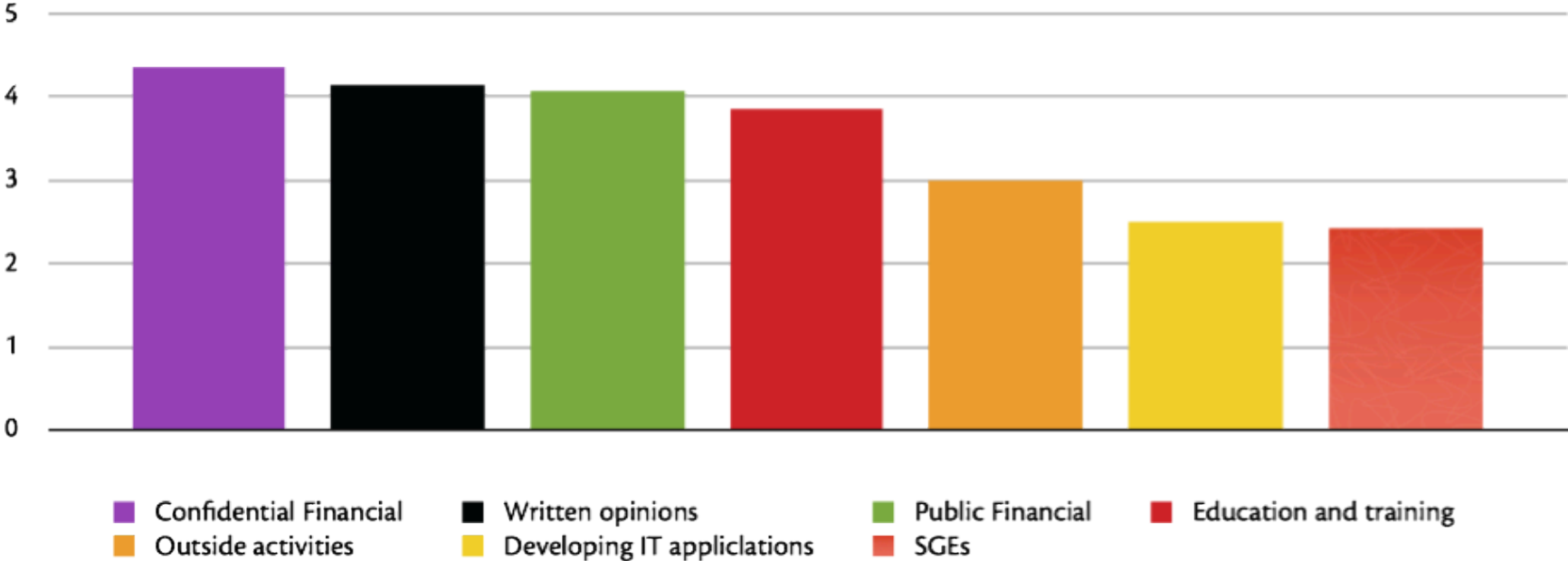
ADAEO' s Grade Level



# Percentage of Time DAEO and ADAEO Spends on Ethics



# Average Time Spent on Aspects of the Ethics Program



**Time Spent Scale:** 1= No time, 2= Limited amount of time, 3= Moderate amount of time, 4= Considerable amount of time, 5= Extreme amount of time.

# Cabinet Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
Visible Support	Distribution of Ethics-Related Information	Participation in Ethics-Related Events	Financial Disclosure and Training Tracking Systems
Access	Marketing the Ethics Program	Collaboration within the Ethics Community	Standard Operating Procedures
Involvement in Managing the Ethics Program	Training	Relationships within the Agency	Program Reviews
Budgetary Support		Searchable Advice and Counsel Databases	Peer Reviews
Awards and Ratings Linked to Compliance with Ethics Requirements		Electronic Filing Systems	Customer Feedback

# Cabinet Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
	Distribution of Ethics-Related Information	Participation in Ethics-Related Events	Financial Disclosure and Training Tracking Systems
Access		Collaboration within the Ethics Community	
Involvement in Managing the Ethics Program	Training	Relationships within the Agency	

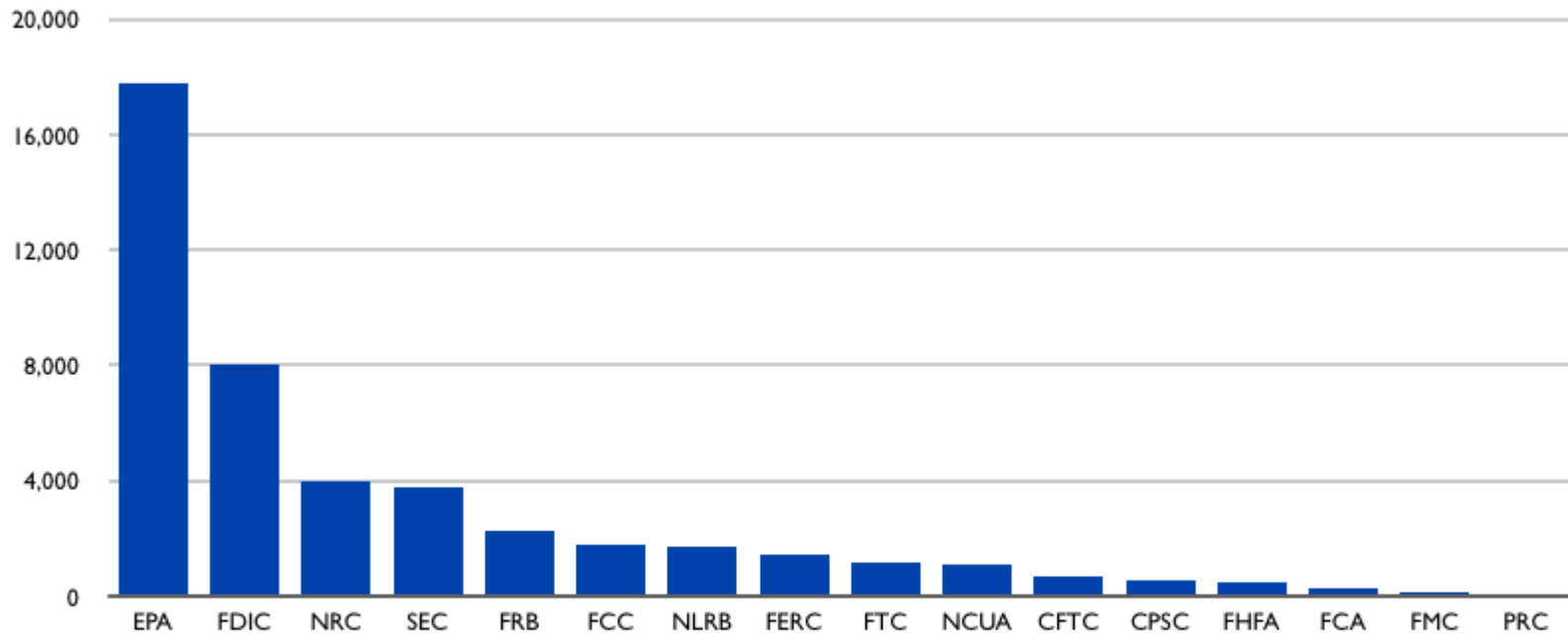
# Cabinet Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
	Marketing the Ethics Program		
			Program Reviews
Budgetary Support			
Awards and Ratings Linked to Compliance with Ethics Requirements			Customer Feedback

# What do the **Regulatory** Agencies Look Like?

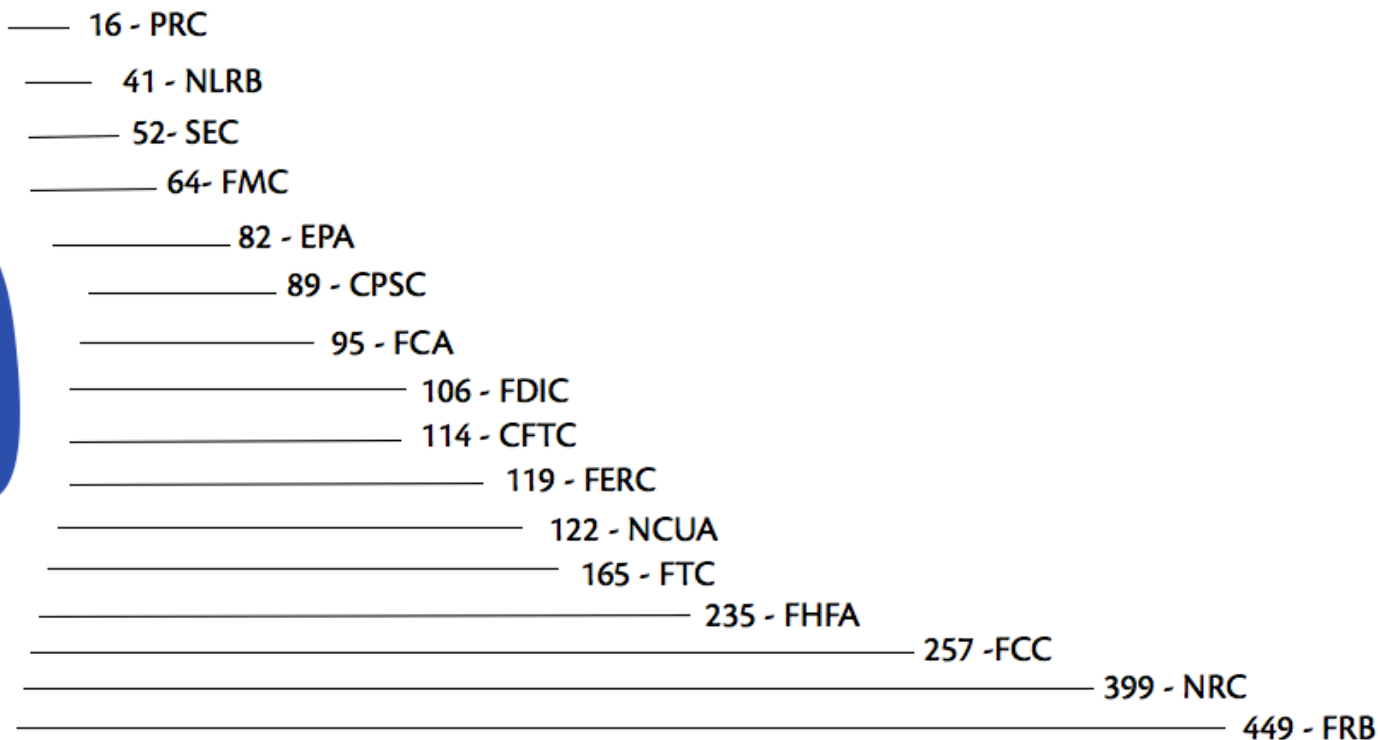


# Number of Full-time Employees

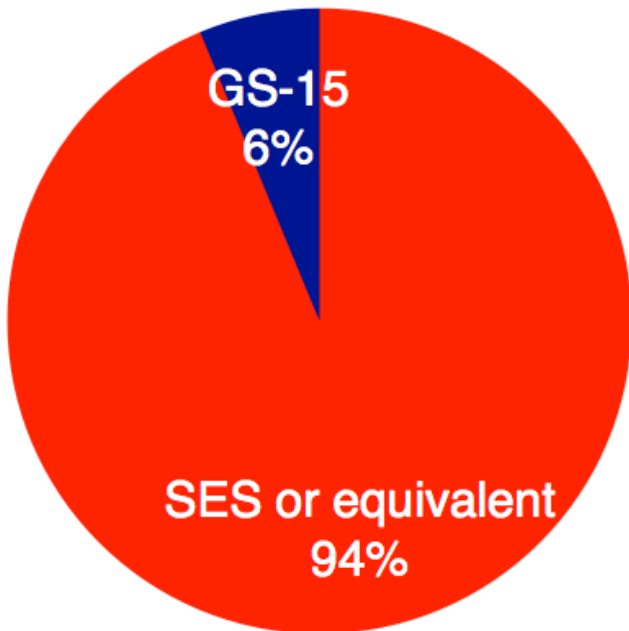




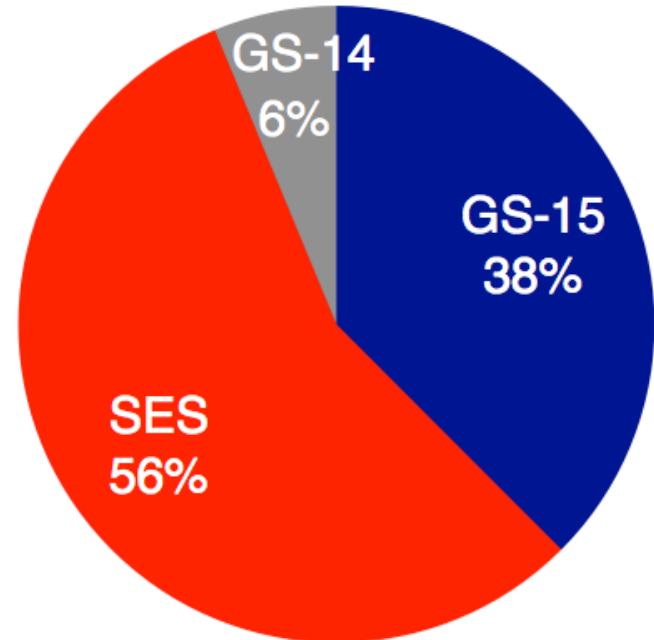
# Number of Employees per One Ethics Official (Includes Full-Time and Part-Time Ethics Officials)



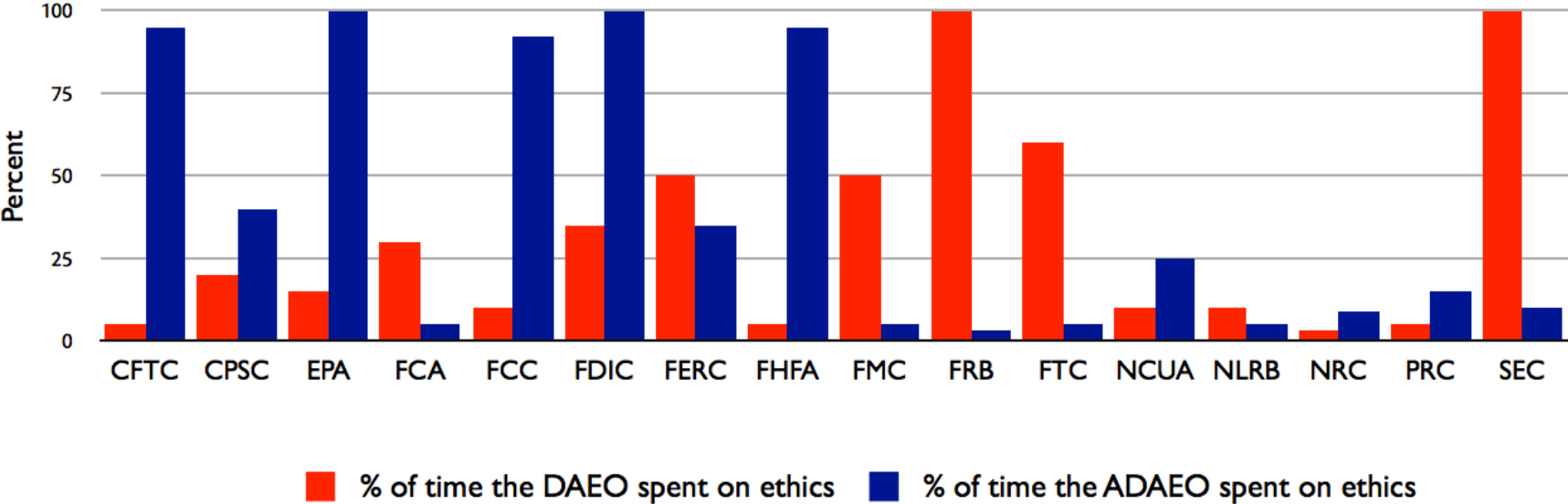
DAEO' s Grade Level



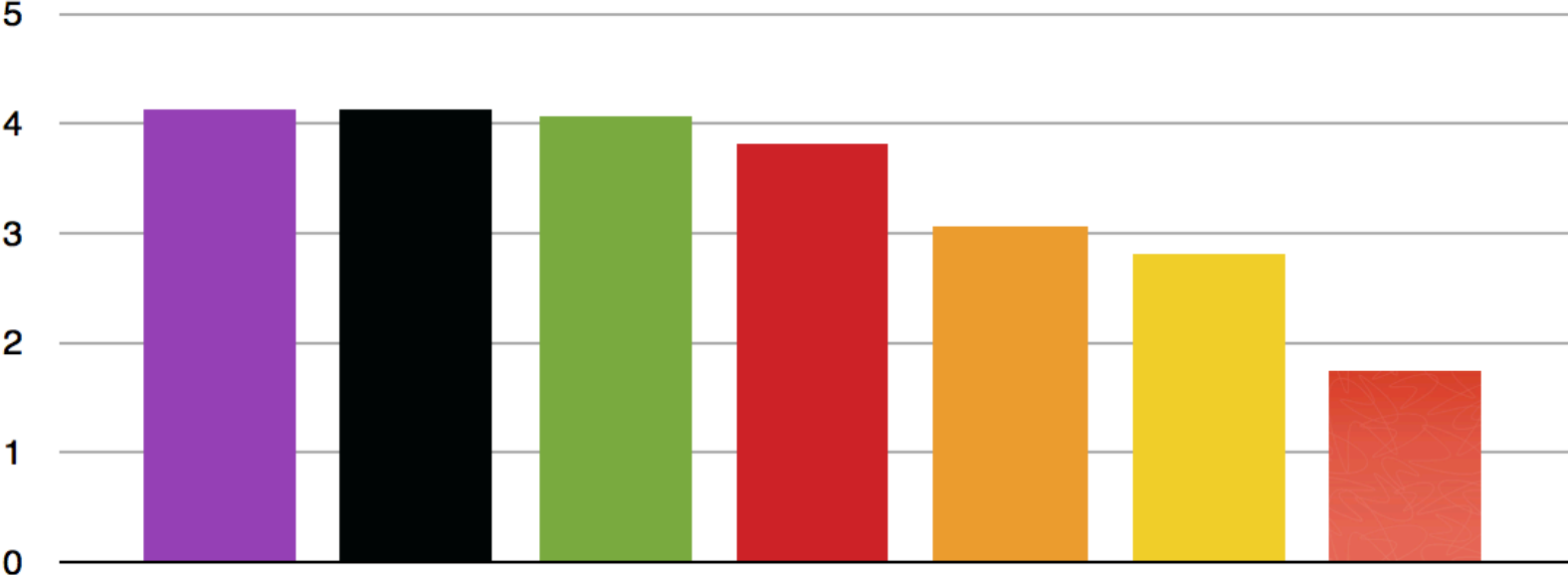
ADAEO' s Grade Level



# Percentage of Time DAEO and ADAEO Spends on Ethics



# Average Time Spent on Aspects of the Ethics Program



Written opinions      Public Financial      Confidential Financial      Education and training  
Developing IT applications      Outside activities      SGEs

**Time Spent Scale:** 1= No time, 2= Limited amount of time, 3= Moderate amount of time, 4= Considerable amount of time, 5= Extreme amount of time.

# Regulatory Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
Visible Support	Distribution of Ethics-Related Information	Participation in Ethics-Related Events	Financial Disclosure and Training Tracking Systems
Access	Marketing the Ethics Program	Collaboration within the Ethics Community	Standard Operating Procedures
Involvement in Managing the Ethics Program	Training	Relationships within the Agency	Customer Feedback
Budgetary Support		Searchable Advice and Counsel Databases	
Awards and Ratings Linked to Compliance with Ethics Requirements		Electronic Filing Systems	

# Regulatory Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
Visible Support	Distribution of Ethics-Related Information		Financial Disclosure Tracking Systems
Access		Collaboration within the Ethics Community	
Involvement in Managing the Ethics Program			
Budgetary Support			

# Regulatory Benchmarking Project Results

Leadership	Awareness	Resources	Oversight
Visible Support			Financial Disclosure and Training Tracking Systems
	Training	Relationships within the Agency	

# Summary



# Benchmarked Agencies Account for:

65% of public financial disclosure reports

52% of confidential financial disclosure reports

53% of all financial disclosure reports

Approximately 27% of all executive branch employees

# Self-Assessment Survey: LEADERSHIP

Rate your leadership's support and involvement in the **financial disclosure**, **ethics training** and **ethics counseling** elements of your ethics program.

## Level 1

- Concrete actions are not taken or inconsistently taken to address the success factor.

## Level 2

- Concrete actions are consistently taken to address the success factor in one or two program elements, but not all three.

## Level 3

- Concrete actions are consistently taken to address the success factor in all three program elements.

# Self-Assessment Survey: AWARENESS

Please rate efforts your agency has taken to build employee awareness of the ethics program and its role in personal ethics responsibilities through **financial disclosure process**, **ethics training** and **ethics counseling**.

## Level 1

- Concrete actions are not taken or inconsistently taken to address the success factor.

## Level 2

- Concrete actions are consistently taken to address the success factor in one or two program elements, but not all three.

## Level 3

- Concrete actions are consistently taken to address the success factor in all three program elements.

# Self-Assessment Survey: RESOURCES

Please rate efforts you have taken to leverage agency and ethics community resources to aid in the **financial disclosure process**, **ethics training** and **ethics counseling** elements of your ethics program.

## Level 1

- Concrete actions are not taken or inconsistently taken to address the success factor.

## Level 2

- Concrete actions are consistently taken to address the success factor in one or two program elements, but not all three.

## Level 3

- Concrete actions are consistently taken to address the success factor in all three program elements.

# Self-Assessment Survey: OVERSIGHT

Please rate efforts your agency has taken to establish internal controls in and oversight of the **financial disclosure**, **ethics training** and **ethics counseling** elements of your ethics program.

## Level 1

- Concrete actions are not taken or inconsistently taken to address the success factor.

## Level 2

- Concrete actions are consistently taken to address the success factor in one or two program elements, but not all three.

## Level 3

- Concrete actions are consistently taken to address the success factor in all three program elements.