

NEW OGE PROGRAM REVIEWS

NEW APPROACH TO CONDUCTING REVIEWS 2- PRONGED

- Three levels of reviews (one size doesn't fit all)
- Review of quality, value, effectiveness, etc., in addition to compliance

PURPOSE OF NEW APPROACH

- Evaluate ethics programs more effectively
- Make better use of OGE's and agencies' time

BACKGROUND

■ Historically, reviews were:

For compliance of systems with ethics laws, regulations, and policies

Of one size regardless of the ethics program

Focused on financial disclosure

BACKGROUND (continued)

■ “Reality checks” along the way to revision:

Why emphasis on compliance over quality, etc., and on financial disclosure?

Why surveys indicating we were totally missing the mark?

What if we said a program was bad and it was really good (and vice-versa)

Were ethics officials being reviewed rather than the program?

LEVELS OF REVIEW

- Level 1 -- Limited 1-3-day review of a regional office or military installation
- Level 2 -- Review in depth of 1 or more program elements or sub-elements
- Level 3 -- Full-blown review

NEW REVIEW STEPS

- Steps addressing quality, value, effectiveness, etc.
- However, more rigorous compliance steps (e.g., enforcement and ethics agreements)

BEEFED UP PRE-REVIEW

- Employee survey
- Scoping to gather more extensive information than before
- Decision on conducting review and, if so, level of review
- Separate determinations on periods of time covered and numbers of documents examined

ETHICS PROGRAM REVIEW ELEMENTS

- Enforcement
- Ethics Agreements
- Written Advice/Counseling
- Education and Training
- Public Financial Disclosure

ETHICS PROGRAM REVIEW ELEMENTS (continued)

- Confidential Financial Disclosure
- Agency-Specific Ethics Prohibitions, Restrictions, and Requirements
- Travel Payments under 31 U.S.C. § 1353
- SGEs
- Independent Boards and Commissions