



United States Office
of Government Ethics

Annual Performance Report

FY 1999

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The mission of the Office of Government Ethics:

The Office of Government Ethics exercises leadership in the executive branch to prevent conflicts of interest on the part of Government employees, and to resolve those conflicts of interest that do occur. In partnership with executive branch agencies and departments, we foster high ethical standards for employees and strengthen the public's confidence that the Government's business is conducted with impartiality and integrity.

The strategic plan for the Office contains four strategic goals. In our FY 1999 annual performance plan, OGE set forth additional performance goals for each of these strategic goals. This report provides a report on OGE's success at meeting those performance goals.

Strategic Goal I

OGE will provide overall policy direction to the executive branch ethics program.

The five Performance Goals supporting this strategic goal focus upon OGE's ability to develop, evaluate and promote ethics policies for employee conduct that protect executive branch processes from conflicts of interest, as well as appearances of conflicts of interest; ensure that these policies are consistent, reasonable, and understandable to employees; serve as the primary authoritative source of Federal executive branch ethics policy; and solicit the advice of agency ethics officials in policy-making processes.

■ Performance Goal

OGE will maintain a strong working relationship with OMB so that advice is sought and employed by them in 90% of legislative and policy issues having a substantial effect on the executive branch ethics program.

OGE believes we have successfully met this goal. OMB requested OGE views on 114 pieces of legislation or testimony during the fiscal year, a number we believe to be high for a small agency. On issues directly impacting the ethics program, OMB employed our input 100% of the time. On matters indirectly implicating ethics concerns, OMB incorporated our comments in some fashion 91% of the time. OGE respects the OMB clearance role and attempts always to comply with their deadlines. During this fiscal year we met those deadlines in every instance.

■ Performance Goal

OGE will speak at least monthly on a formal or informal basis to ethics officials, enforcement officials, the White House or Congress with regard to any recommendations for changes or additions to present policies or with regard to the recognition of any trends that serve as a precursor to a needed policy change. Within 6 months of formally identifying a needed policy change, OGE will draft a proposal to implement that policy.

OGE met with ethics officials on a formal and informal basis throughout the year. The Director held periodic brown bag lunches with ethics officials to discuss ethics program and policy issues, at least one OGE representative attended the monthly interagency ethics council meetings to listen to common concerns that raise policy considerations and we convened informal meetings on various subjects as the need arose. As a member of the PCIE and the ECIE, the Director was in a position to become immediately aware of any investigative trends focusing on employee conduct issues discussed within the investigative community and brought OGE staff to one meeting of each Council to discuss ethics issues. The Office continued annually to survey all U.S. Attorneys' offices and the Department of Justice's Public Integrity Section for information on prosecutions that they are conducting and to work closely with Public Integrity with regard to matters that were referred to them. All such input was and is taken into consideration in reaching conclusions about policy issues. When, during this fiscal year, OGE determined there was a need for a change or an addition to a regulation, a proposed regulation was drafted within 6 months although in some instances that 6-month period naturally extended into this fiscal year.

■ Performance Goal

Congress recognizes the expertise of OGE in the ethics field and takes its comments upon legislation into consideration 75% of the time.

Other than that in conjunction with OGE's reauthorization, Congress held no hearings and introduced no legislation directly affecting the ethics program. Consequently our ability to judge this Congress' recognition of our expertise through this method was limited. However, with regard to the reauthorization, we did testify at the one hearing and we did review an amendment to the criminal conflict of interest statutes that was added to our reauthorization by the House. Comments provided by us were incorporated into the amendment's text and the bill report language. With regard to other legislation where the ethics program was not directly affected but the ethics program would directly affect the ability of executive branch officials to carry out aspects of the bill if it were to become law, we believe that Congress did take into consideration all Administration comments either initiated by OGE or given by OGE; that consideration was reflected by changes made to provisions as a result of our comments.

■ Performance Goal

Within 6 months of identifying a needed statutory change, OGE has submitted it for clearance to OMB and, after clearance, pursues it to enactment within 18 months at least 75% of the time.

OGE submitted its legislative proposal for reauthorization in a timely fashion during the fiscal year but it was not enacted within the period covered by this performance report. While bills reauthorizing OGE for the same period of time have passed both the House and the Senate, the House bill contains an amendment to the criminal conflict of interest laws which was added in markup. The amendment was not an OGE proposal. To the extent that reauthorization did not occur before the last authorization lapsed, OGE was not successful in convincing Congress to meet that deadline but did receive an appropriation. However, OGE continues to pursue the legislation.

■ Performance Goal

OGE's technical assistance [to help U.S. foreign policy anti-corruption initiatives] results in a positive, tangible response from the recipients 75% of the time and in repeated requests for assistance by U.S. agencies or through programs of U.S. organizations sponsored by U.S. agencies 50% of the time.

Requests for the assistance of OGE as a source of information about prevention programs in anti-corruption initiatives of the U.S. and other international organizations of which the U.S. is a member steadily increased. During FY 1999, the number of repeat requests by foreign policy agencies/organizations for OGE briefings more than doubled our performance goal of 4. However, because we participated in a number of briefings of foreign officials in our offices in Washington, it was not as easy to determine if those countries, as opposed to those countries in which specific technical assistance was provided, had developed new programs or modified existing programs as a result of our assistance. For those which we provided specific technical assistance, we exceeded our performance goal of 75% positive tangible responses. For those who simply received briefings, we were unable to tell whether 75% of the recipients responded positively in some tangible way to our presentations when they returned to their countries. At the time of the briefings, they were appreciative of our efforts and the U.S. foreign policy agencies and organizations who hosted many of the delegations continued to request OGE briefings for subsequent delegations. To have systematically pursued whether a visiting delegation had taken something from an in-house presentation and engaged in some positive change within their own country would have required more personnel assets than we felt appropriate to devote. We believe the cost of determining whether we meet this goal outweighs this benefit of this information and we intend to amend this goal.

Strategic Goal II

OGE will support the President, executive branch agency ethics heads and employees in administering effective, fair, and consistent ethics programs within the branch and individual agencies.

The nine performance goals supporting this strategic goal focus upon OGE's ability to provide evaluations of agency ethics programs to agency heads and ethics officials which identify strengths and weaknesses of the program; make specific recommendations for program enhancement designed to help ensure integrity in Government operations; provide timely and accurate written and oral opinions and be available for informal consultations concerning matters involving the applications of the standards of ethical conduct, criminal conflict of interest statutes, and other related statutes and regulations; provide technical assistance to agencies in order to implement well-run and employee-helpful agency ethics programs; provide expert review and conflict of interest analysis of the new, annual and termination financial disclosure reports filed by presidential appointees requiring Senate confirmation to assist agencies in providing appropriate advice on and taking appropriate actions to prevent financial conflicts of interest by those appointees; evaluate follow-up by agencies and officials regarding ethics commitments made by nominees during the confirmation process; and promote the importance of the ethics program to department and agency heads and other Government officials in order to secure personal commitment and sufficient agency resources.

■ Performance Goal

Over a four year cycle, OGE will conduct ethics program evaluations in all Federal agencies focusing OGE's legal, educational and program assistance resources in assisting agencies in the development of better ethics system and the resolution of outstanding ethics issues. OGE will also evaluate major ethics issues during single issue reviews to determine whether OGE and agencies are effectively meeting intended objectives.

To meet this performance goal, OGE will conduct reviews in 55 agencies and conduct 2 single-issue reviews in FY 1999. OGE will make recommendations to improve the program when deficiencies are found in systems and procedures. OGE will also share with agencies the best practices and procedures found during program reviews. These will be shared with agencies during program reviews, and also publicized on OGE's Website and in Newsgram articles.

As a result of a generally fully staffed division supporting this role, OGE exceeded its annual goal of agency program reviews by 18%, conducting 65 reviews in FY 1999. This rate places it well on track to meet the four year cycle. As a result of recommendations made in the reviews, agencies corrected in a timely fashion the deficiencies found at a higher rate than anticipated. In addition, OGE shared best practices during the course of program reviews as well as on OGE's Web site and in Newsgram articles. OGE also conducted three single issue audits dealing with: (1) the utility of 18 U.S.C. § 208(b)(2) exemption regulations issued by OGE; (2) the confidential financial disclosure system; and (3) agency procedures for issuing timely requests for Certificates of Divestiture. Information from the first was helpful in developing revisions proposed by OGE. The results of the latter two reviews indicated general satisfaction with OGE procedures.

■ Performance Goal

OGE will track and monitor the ethics agreements of presidential appointees confirmed by the Senate concerning their financial interests and ensure that such agreements are completed within 90 days of confirmation or within time frames established during the confirmation process. Ethics agreements may consist of divestitures, qualified trusts, recusals, waivers of 18 U.S.C. § 208, or resignations from positions. OGE will take action to resolve cases where agreements have not been satisfied.

OGE found that a number of ethics agreements completed by nominee/appointees within the established time frames was less than we had anticipated but we were pleased that actual completion, though sometimes tardy, was quite high (95%). While we had standard follow-up procedures in place and we followed them in every instance, we are instituting, on a trial basis, new follow-up procedures to see if we can increase the timeliness of the compliance rate. We expect, however, that there will still be instances where appointees encounter unanticipated legal or technical difficulties in meeting a 90-day deadline, particularly where divestiture of a more unique asset is required.

■ Performance Goal

OGE will continually review major trade journals, attend major trade shows and conferences, and consult with Chief Information Officers (CIOs) and Information Resource Management (IRM) professionals of other agencies to keep abreast of and identify useful new technologies or adaptations of present technologies for use in support of OGE and agency ethics programs. At least once a quarter the CIO will report to the senior staff with regard to potential uses of new technologies. Use of a new technology or an adaptation of a present technology will be actively pursued within 60 days of agency approval and implementation schedules will be developed within 120 days. Latest innovations will be showcased by OGE for agencies at least once a year, primarily at the annual conference.

OGE determined to create a fillable SF 278 (the public financial disclosure form) and an SF 450 (the confidential financial disclosure form) and took steps to do so. Using the software available to us at the time, those forms were completed in time for the annual conference, where they were, but for the hurricane-shortened sessions, to have been showcased. Because the software was not as advanced as that available now, the forms are not easily completed and we believe that we must now adapt more recent technology to provide fillable forms that can be easily understood and completed by most filers on most systems. The steps necessary to do this have already begun. Before the weather cut short the conference, OGE was able to showcase an innovative, multimedia training course created by the Central Intelligence Agency (CIA) designed to enable CIA employees to complete required annual ethics training at their desks and provide easy access to ethics reference materials.

■ Performance Goal

Within a four year period, OGE will review, evaluate and include government approved electronic signature filing security requirements into computer software that will allow both public and confidential financial disclosure forms to be completed and filed electronically.

The Government Paperwork Elimination Act became effective October 21, 1998. That Act required OMB to provide agencies with guidance which was not received during FY 1999. Draft final guidance is now available and we are proceeding.

■ Performance Goal

Desk officers will respond to a large number of requests from agency ethics officials for advice on administering an effective agency ethics program, applying the standards of ethical conduct, the criminal conflict of interest statutes, financial disclosure regulations and other related rules and regulations. Desk officers will verify and coordinate advice given to agency ethics officials with the Office of General Counsel when necessary. The advice will be timely and adequate in 95% of the cases. Desk officers will provide information to agency ethics officials regarding the administration of their ethics programs when necessary and appropriate.

Desk officers responded to over 3700 requests during FY 1999. Questions were raised with their supervisors regarding the adequacy of their advice in less than 1% of the requests. For 96% of the requests, a response was provided the same day, and for 3% of the requests, information was provided the following day. This exceeded or met our performance indicators for adequacy and timeliness of ethics program information provided by the desk officers.

■ Performance Goal

The Office of the General Counsel will respond to a large number of requests from agency ethics officials, the DOJ, the White House, IG's, Congress, executive branch employees, and members of the public for interpretations of the standards of ethical conduct, the criminal conflict of interest statutes, and other related statutes and regulations. The interpretations will be adequate in 99% of the cases.

To meet these performance goals, the Office of General Counsel will establish a work tracking system that will quantify annually, the number of inquiries requiring interpretation of relevant statutes and regulations. In 90% of the cases, OGE attorneys will respond to requests for information and for oral statutory and regulatory interpretations within 2 workdays of obtaining the information necessary to respond. In 90% of the cases, OGE attorneys will respond to requests for written statutory and regulatory interpretations within 15 workdays of obtaining the information necessary to respond. In addition, in order to measure the adequacy of the responses, the Office of General Counsel will track the number of instances where a requester or other person contacts OGE questioning the adequacy of advice.

The tracking system established by the Office of General Counsel indicated that over 1100 substantive inquiries were handled by that Office's staff during FY 1999. The adequacy of the advice met our high expectations. In less than 1% of the inquiries the adequacy of the advice was questioned by the recipient. And the responses were provided in a timely fashion—98% received an oral response within two days of a complete request and 90% received a written response within 15 working days of obtaining the information necessary to respond. This exceeded or met our performance indicators for adequacy and timeliness of legal advice.

■ Performance Goal

OGE will respond in writing to agencies concerning exemptions, waivers, late filing fees and other administrative matters in relation to the public financial disclosure system within one week of a final decision made on the matter. Total response time including time for analysis and decision will not exceed 15 working days, except in cases where further information must be obtained from the agencies to act on their request.

OGE did not fully meet this performance goal. However, halfway through the fiscal year, a procedural problem affecting timeliness was identified, the process was changed, and that change significantly increased the timeliness of responses. While our goal was a 90% timely rate, the changes made mid-year brought us to an 80% timely rate. Currently following the new procedures we are reaching a 95% compliance rate. We are, however, finding that requests often require additional information in order to respond and as anticipated, that affects the actual time lapse between initial request and final response.

■ Performance Goal

The Director shall meet with all new agency heads within 6 months of their taking their positions in order to seek personal support of the program. The Director or a member of the staff shall meet with Members of Congress or their staffs on each OGE legislative initiative, on each bill which would amend or add to direct (core) ethics provisions, on each OGE appropriations bill and on at least half of bills seriously considered which contain agency specific ethics measures.

The Director shall meet with the head of each agency when the agency is to receive or has recently received a notice that the agency's ethics program is not properly performing. The Director shall inform White House Counsel of any findings by OGE when a letter has been sent to an agency head that the agency's ethics program is not properly performing.

OGE was very pleased that during the fiscal year we found no agency programs with problems rising to a level that required OGE to send a notice of deficiency. Thus the Director did not have to meet with any agency head for that purpose. Further, few new agency heads were confirmed and sworn in toward the end of the fiscal year and thus the Director was unable to meet with any of them within the few weeks left in this reporting period. He has met with two of the three new agency heads during the first part of this fiscal year and within the 6 month goal. With regard to legislation, the Director and/or his staff has met with Members of Congress or their staffs regarding all legislation proposed by OGE, legislation relating to core ethics provisions and appropriations. Staff of OGE contacted, within the strictures of the clearance process, Congressional staff on those legislative initiatives we knew to exist that contained agency specific ethics measures. However, we found that those contacts typically took the form of telephone conversations, not face-to-face meetings. Telephonic contact was accepted as more efficient by the Congressional staff receiving the calls as well as by OGE staff making them.

■ Performance Goal

Track, collect, review, and certify the nominee, annual and termination financial disclosure statements of approximately 1,000 presidential appointees confirmed by the U.S. Senate to assure Senate confirmation committees and executive branch agencies that appointees financial interests are free from conflicts of interest with the position to which they are appointed. OGE will assist filers in fashioning appropriate remedies to alleviate an actual or apparent conflict of interest. Filers may be advised to consider several different types of action for inclusion in ethics agreements, which are tailor-made to suit the circumstances. Actions may consist of divestitures, qualified trusts, recusals, waivers of 18 U.S.C. § 208, or resignations from positions.

OGE reviewed 271 nominee statements during the period and was able to certify and transmit 78% of them to the Senate within two weeks of nomination. With each transmitted statement, OGE sent an opinion letter indicating either that the statement disclosed no conflict of interest or when necessary, this letter set forth or referred to the steps the individual had agreed to take in order to avoid conflicts of interest in the position for which the individual had been nominated. This transmittal process did not meet our timeliness expectations of 95% within two weeks of nomination because we did not always receive the nominee's final certified form from the employing agency within the two week period. The performance indicator has been changed in FY 2000 to address this issue.

We also received 621 annual and termination statements. We conducted an initial review of 90% of these statements within 60 days of receipt in order to identify any problems requiring immediate attention.

Strategic Goal III

OGE will develop and make available to agencies innovative training and ethics education materials and promote and provide quality education and training experiences for agency ethics officials and employees.

The four performance goals supporting this strategic goal focus on OGE's ability to provide quality education and training courses for agency ethics officials; provide accurate, consistent, beneficial and cost effective materials for agencies to use in their ethics education and training programs for employees; and create opportunities for inter-agency educational programs to disseminate information and encourage the sharing of ideas and knowledge.

■ Performance Goal

Within the first quarter of FY 1999, the Education and Program Service Division (EPSD) will perform an annual ethics training and education needs analysis executive branch wide to: (1) identify subjects ethics officials feel need to be emphasized in training courses and educational products developed by OGE for employees and ethics officials; and (2) identify agencies' logistical needs, i.e., locations for conducting OGE ethics training courses and the types, media and distribution of educational products.

During the second quarter of FY 1999, EPSD will determine what topics and the types of courses and products it will begin to develop during the fiscal year. During the third and fourth quarters of FY 1999, EPSD will develop a plan and schedule to produce these courses and educational products and will follow that schedule.

During the first half of FY 1999, EPSD will be completing course development and educational products begun in the previous fiscal year.

By the beginning of FY 1999, EPSD will have developed a survey/questionnaire to evaluate each of OGE's available training courses and educational products. During the fiscal year OGE will administer the surveys/questionnaires a minimum of 10 times or each new training course conducted or new educational product developed by OGE. OGE will use the results of the surveys/questionnaires to monitor the effectiveness of the course/product and to improve the course or product as necessary.

OGE will maintain an Ethics Information Center (EIC) and will solicit copies of new ethics training products developed by other agencies three times per year. These training products will primarily be available to all executive branch agencies for use by them in developing their own ethics training programs and meeting the annual ethics training requirements.

During the first quarter of FY 1999, EPSD conducted an annual education and training needs analysis by soliciting responses to a short survey provided at the annual ethics conference in September 1998 and by holding a focus group to discuss with ethics officials the topics which they felt needed additional materials. Three major topics were identified: outside activities, gifts and post-employment. Materials addressing outside activities could be substantially affected by the outcome of pending litigation, and therefore OGE focused its attention on the remaining two. EPSD developed a training module and two pamphlets on gifts and the Office of General Counsel (OGC) developed an intermediate course on the post employment conflict of interest law. In addition, OGC developed two intermediate level courses on other aspects of the criminal conflict of interest statutes and a pamphlet on Certificates of Divestiture. EPSD continued to work on developing a course on disqualifying financial interests and began working on a web-based training module covering rules against misuse of position. OGE also began production on a video tape on the 14 Principles of Ethical Conduct. Agency ethics officials played an integral part in this video by identifying employees in their agencies to discuss their personal interpretation of the 14 Principles. A montage of these employees and their comments comprises the substantive portion of the video.

EPSD developed a questionnaire/survey for use in evaluating the effectiveness of OGE's training courses. In addition, OGE developed a short questionnaire for agency ethics officials to administer when they use an OGE training product to conduct their initial and annual training sessions. We were not able to meet our goal of administering the survey 10 times for each new training product because we were reliant upon agencies to use and collect that survey as they used the materials. We did receive 71 evaluations for three different products from agency employees. In general the employees reported that they found these products to be effective and to provide useful information. In order to more effectively meet this goal, we have a survey form that accompanies the newest video. New multimedia education products for employees available on our Web site will seek employee evaluations and we are sending OGE employees to observe employee training sessions conducted by agencies.

OGE maintained the Ethics Information Center (EIC) within its offices offering agencies a central repository where they could use existing training materials to develop their own annual training courses. Materials were solicited for inclusion in the EIC collection at each monthly meeting of the Interagency Ethics Council. In addition, the EIC began to undergo a transformation from a print-material-focused resource to an electronic-material-focused resource.

■ Performance Goal

OGE will complete a timely review of its experiences the previous year with any satellite broadcast or teleconference training and multimedia training, will complete any survey of agency interest in participating in or the availability of agency facilities to broadcast or receive such training, and will develop a schedule to follow in order that by the end of the fiscal year it will have substantially participated in one such broadcast or teleconference event, and/or developed one new multimedia training package.

As a personnel resource decision, OGE determined that it would not sponsor any satellite broadcast or teleconference training but that it would participate if requested when an agency or group of agencies joined to do so. OGE staff did participate in two satellite

broadcasts hosted jointly by the Departments of the Interior and of Agriculture. The audience was estimated by the Departments to be over 40,000 employees. OGE focused its efforts on developing a multimedia web-based training module for agency employees to use in meeting their annual ethics training requirement. Based on the results of the OGE Web site usage access reports this module was one of the most used products available to agencies via the Web site in Fiscal Year 1999. The module was placed on the Web site during the last half of the fiscal year and during those months received over 6,000 "hits."

■ Performance Goal

Annually OGE will develop, administer, and analyze an ethics program survey executive branch wide to determine the state of the executive branch ethics program identifying trends and areas of weakness/strength which it will incorporate into and address in its policy-making, interpretation and opinion function.

OGE sent surveys to 128 executive branch agencies, and with some encouragement, ultimately received completed surveys from all. The information from the surveys was compiled into a report, in part for purposes of identifying possible trends as well as providing a secondary needs analyses for additional training materials. The information from each agency was reviewed to determine if major changes had been taking place, what those changes were and if any early warning signals appeared regarding possible degradation of the agency's program. The surveys were also reviewed by analysts before beginning an agency review.

■ Performance Goal

OGE will plan, develop, host and conduct an annual ethics conference for approximately 450 executive branch ethics officials where attendees will have an opportunity to participate in working sessions on the most current and common ethics issues, receive updates from OGE on all aspects of the ethics program and hear from outside sources and each other on the administration of their ethics programs. Nine months prior to the conference OGE will determine the feasibility of broadcasting selected segments of the conference to off-site locations via satellite or teleconference technology. If broadcasting is feasible, OGE will solicit interest from agency ethics officials for participation in such a broadcast and will identify the most effective location to receive the broadcast. OGE will make all necessary arrangements for transmitting the broadcast.

OGE hosted an annual ethics conference in September, in Williamsburg, Virginia. The conference had 488 attendees registered. Conference attendance is limited by the facilities available so as in the past, the size of an agency's delegation was limited by OGE based on the agency's relative size. (All agencies are allowed at least one—even the smallest agencies). Seventy-seven percent of executive branch agencies were represented at the conference. Because of the number of micro agencies in the executive branch, we now realize our stated target goal of 90% of agencies represented was unrealistic; 75% would be more reasonable and that is the goal we intend to reach in this fiscal year (although the FY 2000 plan states a higher percentage). OGE determined that broadcasting the conference to off-site locations was not feasible and did not pursue that endeavor.

Rather, throughout the year, OGE took individual conference workshop sessions to the regions as a part of the regional training effort. In addition, while the conference was scheduled for 2 1/2 days, a hurricane required that we leave the conference facilities early; as a substitute OGE hosted in the months following the conference, but in this fiscal year, many of the cancelled sessions as individual large workshops here in Washington. Because these workshops were not competing with others as they would have on the conference schedule, much larger audiences have been able to attend each of the sessions. The conference, even shortened, was well received by the participants.

Strategic Goal IV

OGE will administer an effective outreach program.

The four Performance Goals supporting this strategic goal focus upon OGE's ability to foster a greater appreciation on the part of the public and future employees of the fact that there is a strong ethics program for employees of the executive branch and that the standards are enforced; and share the programmatic and policy development experiences of OGE with other governments, non-profits, corporations, professional and trade associations and institutions of higher education who are pursuing the development or enhancement of their own educational or ethics programs.

■ Performance Goal

OGE will seek to participate in 40 in-person or electronic presentations where the public will be able to hear about the executive branch ethics program and will pursue the publication of one article or speech by an OGE employee about the program with a publication with a circulation of at least 2000.

*OGE participated in 37 in-person or electronic presentations where the target audience was the public rather than employee groups. In addition, for two days, OGE participated in Public Service Recognition Week by distributing information about the Agency and Government ethics programs from a booth set up on the Mall. We believe these presentations and activities substantially achieved the goal of 40. An article by the Director was published in *ethikos*, a publication with circulation of over 1000 which examines ethical and compliance issues in business. The article focused upon the Director's perspective of the fight against international corruption.*

■ Performance Goal

By the end of FY 1999, OGE will have at least one educational product and one article in the Ethics Newsgram that will promote public service ethics in general.

OGE published two articles in the Newsgram about public service ethics and began production of a new video as the educational product. That video was not completed during the fiscal year but has subsequently been completed.

■ Performance Goal

OGE will maintain all of its publicly available material, including opinions, advisory letters, memorandums, pamphlets, training course modules, training videos, Newsgrams, etc, on the OGE Home page and on the World Wide Web. OGE will update this material on a monthly basis and review usage reports provided by the Government Printing Office (GPO) which hosts the OGE home page.

Except for its training videos, OGE made all publicly available materials produced by the agency available on its website www.usoge.gov. We were unable to place the videos on the Web because GPO did not have the capability to allow for that during the fiscal year. GPO is in the process of upgrading their capabilities. When that is complete we plan to take full advantage of the new opportunities that provides. We update materials on the OGE home page oftentimes on a daily basis, far exceeding our goal of monthly updates. Reports from GPO show that during the fiscal year OGE's Web site reached over 1,200,000 "hits" with a monthly average of approximately 106,000. We believe this has been a most valuable tool in both our outreach and education programs.

■ Performance Goal

OGE will establish target levels of responsiveness to requests for information under the Freedom of Information Act and the Privacy Act, as well as requests for public financial disclosure forms (SF 278), ethics agreements, waivers issued under 18 U.S.C. § 208(b), Certificates of Divestitures, blind trust documents, reports of agency acceptance of travel reimbursement under 41 U.S.C. § 1353, and OGE informational materials.

To meet this Performance Goal, OGE will establish internal response deadlines meeting or exceeding statutory deadlines in 90% of the cases.

Overall OGE was quite responsive to requests for public information. While we established an internal response deadline for FOIA requests at 10 days, and we met the 10-day deadline 72.5% of the time, the statutory deadline for FOIA was 20 days. We met that statutory deadline 97.5% of the time. Although the Privacy Act does not have a statutory deadline for responding to access requests, we were able to respond to 5 of the 6 Privacy Act requests within the 10 days and all 6 within the 20-day deadline set by the FOIA. For such documents as SF 278s, blind trust documents, and agency travel acceptance reports we met or exceeded our internal response deadlines. We did not receive requests for the other documents listed in the performance goal. We also did not establish a tracking system for supplying hard copies of our informational pamphlets. Rather we were able to respond to those requests much more quickly by directing requestors to our Web site where those materials might be accessed immediately.