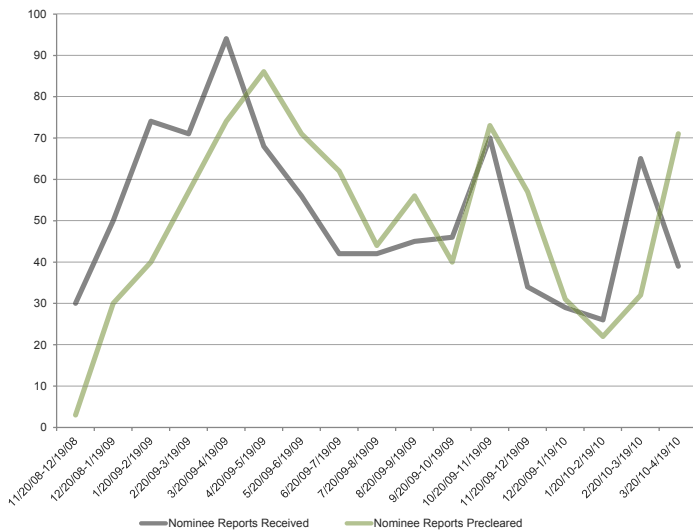


- Walter M. Shaub, Jr., Director, 202.482.9302, walter.shaub@oge.gov
- Shelley K. Finlayson, Chief of Staff, 202.482.9314 shelley.finlayson@oge.gov
- David J. Apol, General Counsel, 202.482.9205 david.apol@oge.gov
- Deborah J. Bortot, Chief, Presidential Nominations Branch, 202.482.9227, deborah.bortot@oge.gov

WAYS OGE CAN HELP

- Briefings before and after the election
- Review of financial disclosure reports
- Consultations on prospective nominees
- "Blind" reviews of certain nominee reports
- Technical assistance with ethics initiatives
- Training and guidance on government ethics
- Training on *Integrity* (e-filing system)



TIMELINE

August
SCHEDULE AN OGE BRIEFING

September
Receive training on *Integrity*

October
Recruit ethics official

November
Collect financial disclosure reports

December
Increase volume of reports

PROCESS

- Provide Nominee Ethics Guide to nominee
- Initiate financial disclosure report in *Integrity*
- Release report to OGE and the agency
- OGE/agency work on report with nominee (multiple rounds over several weeks)
- OGE and agency draft ethics agreement
- OGE "preclears" report
- Senate holds hearings before Inauguration

ADDRESSING RISK FACTORS

• Risk: Too little time

Send OGE as many reports as possible in November and early December

• Risk: Slow responses from nominees

Emphasize the importance of responding promptly to questions about their reports

• Risk: Nominees' resistance to resolving conflicts of interest

Advise nominees early in the process that they and their spouses may be required to make changes to their financial interests

• Risk: Confidentiality concerns shorten timeframe for reviewing certain reports

Request an initial "blind" review by OGE

• Risk: Issues arising from the complexity of ethics rules and the nominee process

Detail an agency ethics official or hire an outside financial disclosure expert