



November 25, 2024

The Honorable James Comer  
Chairman  
Committee on Oversight and Reform  
United States House of Representatives  
Washington, DC 20515

The Honorable Jamie Raskin  
Ranking Member  
Committee on Oversight and Reform  
United States House of Representatives  
Washington, DC 20515

Dear Chairman Comer and Ranking Member Raskin:

I write on behalf of the U.S. Office of Government Ethics (OGE) to submit the agency's report on its successful compliance with subchapter II of the Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act" or "Act"). I am pleased to report that OGE completed all activities required for non-Chief Financial Officer (CFO) Act agencies and made significant progress on improving data validity and data security and privacy, in addition to collecting and analyzing data and making data available to the public.

As noted above, in 2024, OGE met all non-CFO Act agency requirements. Specifically, OGE employed a Chief Data Officer, maintained a Data Governance Board, which met regularly, and participated in Chief Data Officer Council meetings. In addition, OGE continued to validate the data collected from its Annual Agency Ethics Program Questionnaire and maintained processes in place to review personally identifiable information (PII) in all of its new data collections. OGE's progress in these areas is detailed below.

#### *Data Validity*

OGE continued to focus on data validity in 2024 by taking specific steps to promote data quality in its largest executive branch-wide data collection: the Annual Agency Ethics Program Questionnaire (questionnaire). Specifically, OGE took the following steps to improve the quality of data it receives: 1) provided an advance copy of the questionnaire to agencies so that agencies had ample time to prepare complete and accurate responses; 2) automated validation in the survey tool so that invalid responses were flagged and agencies were required to correct the errors before submission; 3) analyzed certain agency responses and followed up on potential data entry errors, misunderstanding of the questions asked, failure to provide required information, and failure to provide clear and responsive explanations; and 4) provided agencies with the ability to pull accurate data directly from OGE's executive branch-wide public financial disclosure system.



## *Data Security and Privacy*

OGE maintained its data security and privacy practices in 2024. Specifically, OGE required all employees to complete annual privacy and security training and required privacy role-based training for all supervisors, managers, and information technology professionals with enhanced access to agency information. OGE also continued to actively use its Privacy Threshold Analysis (PTA) process, the agency's primary tool for ensuring that privacy considerations are integrated throughout the data life cycle. OGE requires a PTA to be completed before staff can develop, procure, or modify any information system. OGE's Privacy Officer reviews each PTA to identify whether the system contains personal information and, if so, what controls are required to protect it. The Privacy Team then works with OGE's Information Technology Division and/or the system owners to implement the necessary controls. This process resulted in the review of more than 11 new or existing information systems in calendar year 2024. Notably, OGE's Privacy Team revised one System of Records Notice (SORN) with executive branch-wide impact and drafted or revised 10 new Privacy Impact Analyses.

## *Data Collections and Analysis*

In 2024, OGE continued to collect and analyze data. For example, OGE conducted its annual survey of ethics practitioners across the executive branch to seek input about their satisfaction with certain resources provided by OGE. OGE also conducted its annual User Satisfaction Survey on *Integrity*, OGE's web-based system for public financial disclosure reports. Responses to these two surveys help OGE to better understand what it is doing well and where adjustments need to be made to better serve the ethics community. OGE also continued to use an evidence-based approach to its advisory formulation process. By using a variety of data sources to inform the topics of its written guidance, OGE can better mitigate risk and serve executive branch officials through its advisories.

## *Data Availability*

In 2024, OGE continued to make data available on its website. For example, OGE provides links to each agency's response to the Annual Agency Ethics Program Questionnaire, as well as a summary report compiling the responses from all 142 agencies. OGE also posted dashboards displaying the number of open program review recommendations at the end of each quarter and the number of referrals to the Department of Justice involving potential violations of the criminal conflict of interest statutes.

Notably, in 2024, OGE also began listing the names of individuals who have received a waiver under the criminal conflict of interest statute, 18 U.S.C. 208(b)(1). OGE lists this information in its Officials' Individual Disclosures Collection (Collection) on its website. Although these waivers were already required to be released upon request by the issuing agency using the process described in 5 U.S.C. § 13107, the public had no way to identify who had received a waiver, in order to submit such a request. Therefore, to effectuate the transparency and public access required under the statute, OGE began posting certain identifying information about individuals who receive waivers issued under 18 U.S.C. § 208(b)(1). The Collection lists the waiver recipient's first and last name, their official position if they are a political appointee, the type of waiver issued, and the name of the employing agency.



Building on its successes in 2024, OGE plans to continue to strengthen its data efforts by complying with any other deliverables required by the forthcoming OMB guidance on implementing Phase 2 of the Foundations for Evidence-Based Policymaking Act of 2018: Open Data Access and Management, required by Office of Management and Budget memorandum M-19-23.

Thank you for reviewing this report of OGE's recent actions under the Evidence Act. If you have any questions, please feel free to contact me at 202-482-9255 or [nstein@oge.gov](mailto:nstein@oge.gov), or Grant Anderson of OGE's Legislative Affairs staff, at 202-482-9318 or [grant.anderson@oge.gov](mailto:grant.anderson@oge.gov).

Sincerely,

Nicole E. Stein  
Chief Data Officer

