



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

U.S. Office of Government Ethics  
250 E Street, SW., Suite 750  
Washington, D.C. 20024  
Attn: Nicole Stein

*Via email*

Re: Comment of Citizens for Responsibility and Ethics in Washington in response to *Solicitation of Input From Stakeholders Regarding the U.S. Office of Government Ethics Strategic Plan (FY 2026-2030)*, U.S. Office of Government Ethics, 90 Fed. Reg. 30937 (July 11, 2025)

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully submits this comment in response to the Office of Government Ethics’ (“OGE” or “the Agency”) July 11, 2025 solicitation of comments regarding OGE’s [Fiscal Year 2026 - 2030 Strategic Plan](#) (“Strategic Plan”). CREW is a nonpartisan government watchdog organization committed to ensuring an ethical and accountable government and, to that end, frequently relies on public financial disclosure reports and other information obtained under the Ethics in Government Act (EIGA). CREW appreciates the dedicated work of OGE staff and their commitment to upholding the public trust in their critical role as public servants. We look forward to this opportunity to collaborate with OGE as it develops a strategic plan to ensure it upholds to the best of its ability the continuity and adherence to the ethics laws and principles that are showing signs of failure in the current political environment and particularly this administration’s actions thus far.

CREW respectfully notes that [its previous comments](#) submitted in 2021, as OGE prepared its current FY 2022 - 2026 strategic plan, raised a number of the same concerns noted below, reflecting that the threats that had emerged by that time have not only remained but been exacerbated since. With the escalation of these threats to the ethics compliance and oversight regime given the realities of political pressure and politicization of federal programs, CREW encourages OGE to focus its work on upholding current ethics laws and maintaining meaningful engagement with the executive branch ethics community, Congress and the public to support and preserve ethics norms against the ongoing erosion of ethical standards.

As threats to the integrity of our democracy continue, CREW urges OGE to remain focused on the critical element of transparency in representative government. Each of OGE’s operations and goals should focus not only on compliance with gathering and making available required information about agency programs and officials potential conflicts of interest but also on conveying any obstacles to those ends and any trends of noncompliance to Congress for appropriate oversight and to the public, including reflecting its expert analysis of any notable issues that pose a threat to the public trust. Given the fragility of the current ethics regime, OGE must consider innovative ways to

[info@citizensforethics.org](mailto:info@citizensforethics.org) 202.408.5565

[CITIZENSFORETHICS.ORG](https://CITIZENSFORETHICS.ORG)

achieve its mission and elevate concerns that the community it leads so clearly understands for more effective public awareness of the nature and significance of ethics violations.

While we understand OGE has limited legal authority to compel recalcitrant executive branch officials to comply with the current ethics regime, it nonetheless remains uniquely positioned to coordinate the gathering and dissemination of information of the threats to that regime and the community that it leads. This is particularly true after the current administration [fired Inspectors General](#) across the executive branch who were partners in OGE's [efforts to uphold the integrity](#) of government programs.

### **CREW Suggestions**

- **OGE should include specific information addressing the actual and apparent ethics violations by the president and those who report to him, including relevant responsive steps that OGE will take to fulfill its mission as an independent agency responsible for leading the oversight of ethics programs in the executive branch.**

CREW understands that holding the president accountable for ethical violations presents some complicated constitutional questions, but nonetheless it is an issue that OGE must unfortunately contend with. We suggest that OGE develop a direct response to the systemic problem of executive branch culture such a situation presents, and support the suggestion that, at the very least, OGE begin program reviews of the White House and Vice President's ethics offices. More specifically, OGE must improve Strategic Goal I: Help Top Executive Branch Officials Resolve Conflicts of Interest and Meet their Ethics Responsibilities. The draft's current strategies focus on reviewing senior financial disclosure filers' disclosure reports and resolving potential conflicts of incoming senior leaders, as well as encouraging senior leaders' support of the ethics program. But the performance indicators reflect the limits of these strategies through measuring the speed of the process of financial disclosure report reviews and quantifying the number of contacts made with senior leaders. This approach is deficient when the goal must be to strive for qualitative improvement in ethics culture and meaningful measures to address potential conflicts, and responsiveness to resolution rather than mere timing.

Given current political divisions, [public distrust of political leaders](#), including the president, reflects a paramount need to build accountability at the most senior levels of government. Doing so is a critical step in avoiding a cycle of distrust that undermines democratic institutions and equal and fair representation, preventing ongoing cycles with future administration changes that senior leaders can follow separate sets of rules and undermine public trust generally. To illustrate, in 2017, President Donald Trump entered office with the [most significant and flagrant conflicts of interest](#) in the history of our country, and in 2025, those [unprecedented violations](#) have [grown even more egregious in scope and number](#). Critically, his unwillingness to ameliorate those conflicts undermined the entire executive branch ethics program. OGE's Strategic Plan is not sufficiently responsive to that reality.

OGE's current plan proposes to measure the effectiveness of its support to campaigns and transition teams by the timeliness of its actions, quantity of resources provided and satisfaction of recipients. But the Trump-Vance transition team's [refusal to adhere to the ethics requirements of the transition process](#) after the election reflects that OGE's efforts and compliance with its duties do not

fully reflect the adequacy of the executive branch ethics program as a whole. In other words, OGE should include performance indicators not only about the success of its staff in meeting their statutory requirements but reports about the success or failure of the administration counterparts in meeting its requirements to engage as well.

Given the precedent set during President Trump's first term, private discussions with and referrals to the president related to his and his administration's [repeated ethical violations](#) were nearly meaningless tools in the fight to ensure compliance and accountability. We urge OGE to consider how it may highlight such violations for the public and their representatives in Congress in the future in a way that precludes these violations from being mooted after being referred. One potential solution may include compiling a list of referrals and responses for public posting, documenting the work that OGE and executive branch ethics officials are doing to ensure the American public that its government is working for them and not for their own private interests. Another may be to commit to preparing an annual public risk assessment report to Congress detailing the administration's level of compliance with the ethics program, the specific failures in agencies and high level officials and a section detailing how to bring the administration fully into compliance. Additionally, OGE should also consider publicly addressing the risks presented when senior administration officials and advisors [do not take a salary](#) and are not formally recognized in roles subject to ethics regulation.

To this end, CREW appreciates Strategic Goal IV: Use Transparency to Further Oversight of the Executive Branch, but urges OGE to include clear objectives that will broaden public engagements, beyond generic “public-friendly, explanatory content.” Informing the public to foster an engaged electorate should incorporate the benefit of OGE expertise to provide objective analysis of the information being conveyed, set in context of precedent, to meaningfully illustrate what the data being provided means. One of the primary shortcomings of the EIGA has been its lack of enforcement mechanisms, particularly for senior officials, with very few, if any, repercussions for violations by the president. Traditionally, the weight of public pressure against bad behavior by the administration was sufficient to overcome the lack of enforcement mechanisms against the president and the discretion given to the president for remediation of violations by his senior staff. To the extent OGE can leverage its ability to report out—to Congress and the public—the information that others are disregarding and even silencing, this would be an important step toward the accountability that is desperately needed to prevent corruption from continuing.

- **OGE should commit to developing a more qualitative and normative review of agency ethics programs that acknowledges the changes in program staffing and resources, including politicization of ethics office leadership and the loss of expertise of career officials, to inform its own assessment of the sufficiency of agency programs as well as Congress, stakeholders, and the public.**

Strategic Goal II [sic (should be III)]: Hold Executive Branch Agencies Accountable for Carrying Out an Effective Ethics Program reflects some of the critical issues the agency faces in light of the [assault on and intended transformation of the federal workforce](#) over the past six months, but CREW encourages OGE to address specifically the impacts that underscore this goal. OGE's strategies for monitoring compliance and addressing ethics risks continue to rely on its current methods of program review without acknowledging that the size and formulation of the federal workforce

requires an updated approach to capture the nature and scope of programmatic risks and the consequences.

The current process of OGE review of executive branch agency ethics programs consists of an annual questionnaire completed by each respective agency and a more in-depth program inspection conducted by OGE on a rotating basis over several years. The annual questionnaire provides the most frequent snapshot of an ethics program's compliance, reporting data about agency ethics officials and technical compliance with deadlines and processes required under OGE regulations. But these documents, which provide key data points on program compliance in light of the many staffing and resource changes, will not be available to the public likely until the Spring of 2026, and if OGE's previous practice remains in place, it will provide a summary report that reflects no more than a literal summation and effective data dump. That quantitative approach serves the public only in a very limited way because it does not give any context and should be expanded to require agency ethics programs to provide more qualitative information about the risks presented to their agency and their actual or attempted resolutions. We urge OGE to leverage its bird's eye view of agency programs in total to reflect upon the trends they observe in the risks faced by agency programs and individual officials as well as the successes and shortcomings of current authority and implementation of ethics programs.

OGE's strategies, methods and measures of performance reflect an approach that has not sufficiently adapted to the seismic shift in the executive branch landscape. The complexity of the federal government—both in number of agencies and amount of staff—means that raw data about quantitative compliance is particularly difficult to interpret without additional context from experts. Moreover, the sudden and drastic changes implemented over the past six months have made clear that the current systems of review are insufficient in providing timely insight into the efficacy of ethics programs. [Politicization of leaders in the workforce](#)—including both in ethics programs and resource partners like HR and IG—coupled with [the decimation in numbers of career staff across executive branch agencies](#), create unique challenges for the objective enforcement of the ethics regime as it has been administered. The administration's composition of [“the wealthiest set of Cabinet nominees and White House appointments in history”](#) has brought unfathomable complexity to the process of financial disclosure review. Their complexity was exacerbated by the delays in President Trump's willingness to engage in the legal requirements to begin the transition process and demonstrated the heaviest [burdens placed on OGE and agency ethics officials](#) in memory. The administration's changes to convert HR leadership positions to political appointments, implement [Schedule F](#) to remove civil service protections to remaining senior career employees and its recent announcement of [Schedule G](#) to expand the political workforce to fill vacancies during the presidential term, undermine the objectivity that has been inherent in the administration of the federal ethics program. This increase of politicized positions, coupled with the reduction in agency staff through the administration's reductions in force, deferred resignations and attrition over the past six months, supports the presumption that ethics offices are increasingly being turned over to political appointee leadership and have lost wide ranging expertise of ethics law as well as agency precedent in risk identification and assessment.

We believe OGE must commit to incorporating more qualitative data gathering and consider methods to publish information more efficiently where possible. One solution might be to reflect staffing by agency—including up to date vacancies in DAEO and ADAEO positions, the length of time such vacancies have been unfilled, whether those positions are held by political appointees, and

vacancies in each agency ethics office. This information may be gathered as part of a quarterly data call aligned with branch-wide leadership meetings and posted with minor tweaks to the existing chart of agency program contact information. This information, especially if presented with OGE's analysis of its observations of the effect of political leadership in ethics programs, would be particularly helpful to Congress and stakeholders in determining how to ensure that ethics is administered effectively and objectively without regard to the political administration in power.

- **OGE should include more specific commitments recognizing the breadth and depth of support that will be needed to facilitate effective adherence to federal laws and the system of conflict of interest identification and resolution in light of the loss of expertise in the ethics community as well as the complex and novel issues presented by the financial interest and associations of Executive Branch officials.**

With the transformation of the workforce discussed above, OGE's commitment to provide support to the challenges faced by agency ethics officials under Strategic Goal II: Advance a Strong, Consistent Executive Branch Ethics Program will mean a panoply of different needs to be addressed. Risk assessments require specialized knowledge of both the ethics laws and regulations as well as agency specific operations, which will be a hard combination of knowledge to replace, if and when the [hiring freeze](#) is lifted and programs could be permitted to right-size their staff appropriately.

We also recognize that the task of supporting agencies in rebuilding expertise will be exacerbated by OGE's own losses of personnel and institutional knowledge lost as an agency. We encourage OGE to engage in meaningful outreach and dialogue with nonpartisan public interest resource partners and stakeholders through appropriate channels and legal authority to assist as appropriate under federal law and we would be happy to be a part of that process of rebuilding knowledge. To this end, we support the suggestion that OGE reconvene in-person ethics conferences to provide resources to strengthen the ethics community through knowledge sharing and partnership building.

In addition to the need to support growth and professional development of ethics officials regarding ethics law and programmatic process, OGE must be seriously engaged in novel issues that have emerged as part of federal conflicts of interest compliance, such as the use and investment in cryptocurrency. The cryptocurrency industry and its related interests are evolving by the day and are not commonly understood within the ethics community nor the public at large. It will be a critical function of OGE to provide training to the executive branch ethics community to understand how potential conflicts can arise based on these assets and what reporting and compliance is appropriate. In addition, this administration has openly promoted, supported and engaged in cryptocurrency matters in which the president and his top advisors are inextricably connected to through their business dealings and financial holdings. These matters have included the president's [memecoin dinner](#) that gave [top holders](#) White House access; [direct financial interests](#) in the cryptocurrency industry; and ownership of assets being [proposed for holding in a national reserve](#). OGE not only needs to ensure that the ethics community has the expertise to understand how these assets work, but also to adequately inform Congress and the public of the relevant risks and significance to potentially corrupt government officials as well as to potentially manipulate markets.

## **Conclusion**

Despite OGE's continued adherence to implementing the federal ethics regime and the dedication of career ethics officials throughout the executive branch ethics community, the shortcomings of the current system require improvements. Disregard for and attacks on the fundamentals of ethical governance have undercut the nearly five decades that shaped the government ethics regime that Congress put in place to respond to a previous attack on the integrity of government institutions following President Nixon's actions in the wake of the Watergate scandal. In light of the decidedly more brazen attacks on that regime, OGE must use its current authority to raise attention to modern day threats that require immediate attention for improvements and overhaul for stronger mechanisms to prevent corruption by the highest government officials and within government programs.

OGE cannot be singularly responsible for repairing the damage caused by attacks on the ethics regime, but it must be proactive in its mission, particularly to ensure that [public service is a public trust](#) requiring that government officials place loyalty to the Constitution, laws and ethical principle above private gain, even in situations where there is an appearance of a violation of the laws or ethical standards. This comment reflects CREW's initial suggestions as you revise this plan to be innovative in leading a path forward to restoring and strengthening our systems of ethical governance. CREW welcomes the opportunity to collaborate with you through this process.