

**JOB AID: CONFIDENTIAL FINANCIAL DISCLOSURE (CFD) REVIEW SEASON: CHALLENGES AND TOOLS/SOLUTIONS
THIS CHART IS A RESULT OF DISCUSSIONS WITH ETHICS OFFICIALS DURING THE 2021 CFD WORKSHOP IN
PREPARATION FOR THE CFD FILING SEASON.**

CHALLENGES	TOOLS/SOLUTIONS
Identifying Filers	
Ambiguous Position Descriptions	<ul style="list-style-type: none"> -Explore joint training opportunities between HR, supervisors, and the ethics office to reach consensus on filing requirements -Conduct regular position description audits with HR and distribute updates to reviewers -Designate filing status in position descriptions
HR and Agency Cooperation/Collaboration	<ul style="list-style-type: none"> -Develop, establish, and distribute SOP/ MOU between HR and the ethics office outlining the process to notify and track incoming/outgoing filers -Timely communicate employee movement (transfers, acting roles) between HR and ethics
Filer Compliance	<ul style="list-style-type: none"> -Communicate proactively and cyclically with filers -Publish and distribute agency ethics office POC list -Involve leadership (i.e., memo from supervisors to employees)
<i>OGE Resource</i>	Designating Filing Positions
Training Reviewers	
Competing Agency Training Requirements	<ul style="list-style-type: none"> -Obtain leadership engagement (i.e., a memo from the agency head) -Schedule multiple CFD reviewer training sessions
Keeping Reviewers Updated	<ul style="list-style-type: none"> -Start training reviewers early in November and December (highlight any changes from the previous year) -Create a conflicts of interest (COI) checklist (highlight known or recurring conflicts relevant to your agency) -Provide a link to OGE’s Institute for Ethics in Government (IEG) training curriculum via email and on internal agency ethics web page
Familiarize Reviewers with Complex CFD Requirements	<ul style="list-style-type: none"> -Distribute training aids, FAQs, and/or links to agency-specific and recurring filing questions -Provide virtual consultations on topics (i.e., train the trainer, issue spotting, analyzing COI)
<i>OGE Resource</i>	IEG Confidential Financial Disclosure Review Curriculum
Communication Strategies with Filers	
Filers Unresponsive to Emails	<ul style="list-style-type: none"> -Maintain records of notification attempts -Identify delinquent filers, and include supervisors and agency leaders on the emails and notifications to filers -Withhold administrative award recognition from individuals who do not comply with requirements
Leadership Engagement	<ul style="list-style-type: none"> -Allow the agency ethics team to attend leadership meetings -Enlist assistance from agency leaders to stress employee responsibility, importance of filing and timely compliance
Technical Issues	<ul style="list-style-type: none"> -Partner with Agency IT as part of the communication plan -Automate calendar reminders
Large Number of Filers	<ul style="list-style-type: none"> -Develop and distribute Listserv notifications for each type of filer (annual and new entrant)
<i>OGE Resource</i>	5 CFR § 2638.105; 5 CFR § 2634.701; Leadership Engagement