

**JOB AID: PUBLIC FINANCIAL DISCLOSURE (PFD) REVIEW SEASON: CHALLENGES AND TOOLS/SOLUTIONS
THIS CHART IS A RESULT OF DISCUSSIONS WITH ETHICS OFFICIALS DURING THE 2022 PFD WORKSHOPS IN
PREPARATION FOR THE PFD FILING SEASON.**

CHALLENGES	TOOLS/SOLUTIONS
Identifying Filers	
Knowledge of filer status change i.e. promotions, incoming, terminations, details, acting	<ul style="list-style-type: none"> ▪ Create excel spreadsheets and automated notification systems to track employee movement, jointly monitored by ethics office and HR ▪ Send biannual request to supervisors about personnel changes and changes to filing status
High turnover in HR	<ul style="list-style-type: none"> ▪ Assign specific ethics staff as HR POC responsible for employee movement
Filers unaware they have to file	<ul style="list-style-type: none"> ▪ Collaborate with HR to distribute list of promotions to affected departments with information on filing status ▪ Use SOPs to ensure that filing requirements are included in job announcements
<i>OGE Resource</i>	Designating Filing Positions
Training Reviewers	
Keeping up with current agency conflicts of interest (COI)	<ul style="list-style-type: none"> ▪ Create a Contractor/Prohibited sources list ▪ Partner with contracting and procurement staff to review for potential conflict of interest
Preparing new reviewers to analyze complex reports	<ul style="list-style-type: none"> ▪ Establish mentorships between experienced and newer reviewers ▪ Schedule open house hours for reviewers to ask questions ▪ Develop SharePoint and intranet resources with on demand training for new reviewers ▪ Use OGE/IEG training materials ▪ Review all Ethics Agreements prior to reviewing reports ▪ Conduct small group (quarterly and annual) reviewer training for staff managers and section leaders
Analyzing new and emerging financial instruments	<ul style="list-style-type: none"> ▪ Provide reviewers with a financial terminology guide ▪ Keep up with mergers and acquisitions of/by companies in sectors regulated by your agency
<i>OGE Resource</i>	Public Financial Disclosure Review Curriculum
Communication Strategies with Filers	
Apprehensive filers that don't reply in a timely manner	<ul style="list-style-type: none"> ▪ Establish an ethics email Inbox dedicated for questions filer may have ▪ Distribute annual prosecution surveys to emphasize importance of compliance
Uncomfortable conversations with filers	<ul style="list-style-type: none"> ▪ Schedule one-on-one consultations
Agency Communication Plan not comprehensive	<ul style="list-style-type: none"> ▪ Distribute preseason communication plan checklist to ethics staff ▪ Create a monthly newsletter that uses practical examples of potential conflicts of interest ▪ Engage leadership and encourage their participation in the kick-off to filing season ▪ Initiate early notifications of 278 due dates and follow-up weekly with courtesy notices/reminders
<i>OGE Resource</i>	Strategic Communications Planning - New Leadership