



December 6, 2021

The Honorable Gary Peters  
Chairman  
Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, DC 20510

The Honorable Rob Portman  
Ranking Member  
Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, DC 20510

Dear Chairman Peters and Ranking Member Portman:

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-CFO Act agencies and made significant progress on improving data validity, security and privacy, data collections, and data visualization.

In 2021, OGE met all non-CFO Act agency requirements. Specifically, OGE employed a Chief Data Officer (“CDO”), maintained a Data Governance Board; and regularly participated in CDO Council meetings. In addition, in 2021 OGE advanced in the areas of data validity, security and privacy, data collection, and data visualization. Specifically, OGE continued to validate the data collected from its Annual Agency Ethics Program Questionnaire, put processes in place to review personally identifiable information (PII) in all of its new data collections, conducted several new data calls, and visualized two additional data sets. OGE’s progress in these areas is detailed below.

*Data Validity*

OGE improved data validity in 2021 by taking specific steps to promote data quality on its largest executive branchwide data collection: the Annual Agency Ethics Program Questionnaire (“questionnaire”). Specifically, OGE took the following steps to improve the quality of data it receives: 1) providing an advance copy of the questionnaire to agencies so that agencies have ample time to prepare complete and accurate responses; 2) automating validation in the survey tool so that invalid responses are flagged and agencies are required to correct the errors before submission; 3) analyzing certain agency responses and following 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) providing agencies with the ability to pull accurate data directly from OGE’s executive branchwide public financial disclosure system.

*Data Security and Privacy*

OGE improved its data security and privacy in 2021. Specifically, OGE required all employees to complete annual privacy and security training and introduced new privacy role-



based training for all supervisors, managers, and information technology professionals with enhanced access to agency information. OGE also fully implemented 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 change 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 users to implement the necessary controls.

### *New Data Collections*

In 2021, OGE conducted several new data collections. Specifically, OGE conducted surveys to support OGE's decision-making in implementing Safer Federal Workforce guidance and new executive orders on diversity, equity, inclusion, and accessibility (DEIA). OGE regularly surveyed its staff in 2021 to inform its workplace safety plan and to plan for employees return to its physical office space. OGE also surveyed its staff regarding its DEIA efforts. In addition, OGE conducted a [demographic survey](#) of ethics practitioners across the executive branch to inform its Equity Action Plan and to tailor the professional development opportunities it provides to ethics officials.

### *Data Visualization*

OGE improved data visualization in 2021 by adding two [new dashboards](#) to the suite of ethics information OGE makes available on its website. Posted quarterly, these dashboards provide insights into OGE's role in overseeing the executive branch ethics program. Specifically, one dashboard displays the categories of open recommendations OGE issues as part of its review of agency ethics programs, and the other displays information about the categories and number of potential violations of the criminal conflict of interest statutes. Both provide stakeholders with new information and insights into OGE's work and the executive branch ethics program.

Building on its successes in 2021, 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 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