

**ETHICS PROGRAM REVIEW FOLLOW-UP REPORT**

Agency: Federal Housing Finance Authority (FHFA)

Follow-up to OGE Report Numbers: 25-35I

Report No.: 26-15IF

Date: March 4, 2026

UNITED STATES OFFICE OF  
**GOVERNMENT ETHICS**

  
Preventing Conflicts of Interest  
in the Executive Branch

As a result of its review of the Federal Housing Finance Authority’s (FHFA) ethics program, the Office of Government Ethics (OGE) issued four recommendations in its February 2025 inspection report. OGE conducted a follow-up review to assess whether FHFA had taken sufficient action to resolve the deficiencies underlying the recommendations. The results of the follow-up review are summarized below.

	<b>Recommendation</b>	<b>Agency Action and OGE Finding</b>	<b>Status</b>
1	Ensure FHFA has an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<p><u>AGENCY RESPONSE:</u> The Ethics Office plans to meet with FHFA’s Chief People Officer and the Chief of the Human Capital Client Services and Systems Branch to ensure an effective process is implemented for notifying prospective employees of the required ethics information with their written offer of employment.</p> <p><u>OGE FINDING:</u> OGE has examined the notification that was sent to the new employee of FHFA and found that the letter met required ethics information of a written offer of employment letter.</p>	Closed
2	Ensure FHFA OIG has an effective process for ensuring all covered employees receive the required information with their written offer of employment. <i>See</i> 5 C.F.R. § 2638.303.	<p><u>AGENCY RESPONSE:</u> FHFA-OIG ethics staff will work with the OIG Human Resources office and its outside servicer to build in processes and procedures that ensure prospective employees and supervisors timely receive the required ethics information.</p> <p><u>OGE FINDING:</u> FHFA-OIG has not hired a new employee during 2025 but have provided a template that will be used when they offer employment to a new prospective employee and new supervisor in 2026. OGE has examined the written offer of employment template and it meets all ethics language requirements.</p>	Closed

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3	Ensure FHFA OIG establishes written procedures for issuing notices to prospective employees. <i>See</i> 5 C.F.R. § 2638.303(c).	<p><u>AGENCY RESPONSE:</u> FHFA-OIG ethics staff will work with the OIG Human Resources office and its outside servicer to build in processes and procedures that ensure prospective employees and supervisors timely receive the required ethics information.</p> <p>FHFA-OIG have not established written procedures for issuing notices to prospective employees with its OIG Human Resources office and its external service provider. The use of the external service provider will terminate at the end of the fiscal year. FHFA-OIG is currently procuring a new Human Resources service provider and will address the procedures as part of the process.</p>	Open
4	Ensure FHFA OIG establishes written procedures for issuing notices to new supervisors. <i>See</i> 5 C.F.R. § 2638.306(b).	<p><u>AGENCY RESPONSE:</u> FHFA-OIG ethics staff will work with the OIG Human Resources office and its outside servicer to build in processes and procedures that ensure prospective employees and supervisors timely receive the required ethics information.</p> <p>FHFA-OIG have not established written procedures for issuing notices to prospective employees with its OIG Human Resources office and its external service provider. The use of the external service provider will terminate at the end of the fiscal year. FHFA-OIG is currently procuring a new Human Resources service provider and will address the procedures as part of the process.</p>	Open

Based on the results of OGE’s follow-up review, recommendations 1 and 2 are closed. OGE will conduct an additional follow-up review in approximately six months to assess whether FHFA-OIG has taken sufficient action to resolve the deficiencies underlying recommendations 3 and 4, which remain open.