From: Catherine Dennis
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 5:28:06 PM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional;
2) Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
3) Remove the offensive example involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Why do I write with these comments? Well, let's see here: I am a disabled, semi-retired former English college instructor and professor. For close to 30 years, I worked in traditional higher education, and towards the end of my career, I worked specifically in developmental education and adult education. I suppose, then, by the logic recommended in these fund regulations, or lack thereof, I should've just let my students comply with my University, college, high school, and GED testing requirements as they desired or felt impelled from any sense of their own morality. In fact, why should I have even bothered to enact or enforce any policy on the part of the institutions for which I worked, if, after all, I tend to distrust the power of institutions such as higher education where federal funding is concerned? I could have simply opted to do what I wanted and let plagiarizes plagiarize, cheaters cheat on tests, and on and on. But ah, then, you see my dilemma.

Quash and revise this nonsensical approach to what should be or become a non-partisan, transparent, openly ethical office and set of regulations. I am committed to becoming an ethical human being and expect my government to reflect and represent such.