



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

April 28, 2014  
PA-14-01

## MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Joseph E. Gangloff  
Deputy Director for Compliance

SUBJECT: 2014 Deadlines and Procedures for Public Financial Disclosure Reports of Executive Branch Officials Required to be Transmitted to the U.S. Office of Government Ethics

The financial disclosure system is a keystone of the executive branch's ethics program. Through the financial disclosure process, the U.S. Office of Government Ethics (OGE) and executive branch agencies assure the President, the Congress, and the public that officials at the highest levels of government are free from conflicts of interest.

Unless an extension is granted, annual public financial disclosure reports (OGE Form 278) must be filed with agencies no later than May 15, 2014. OGE's regulations, at 5 C.F.R. § 2634.605(a), require executive branch agencies to review these annual public financial disclosure reports within 60 days of receipt. Agencies must then promptly transmit to OGE the reports of Presidentially appointed, Senate-confirmed (PAS) officials and Designated Agency Ethics Officials (DAEO).

In order to ensure proper tracking of PAS and DAEO reports, OGE's Compliance Division will contact each DAEO to identify covered filers. Specifically, by April 30, 2014, the Compliance Division will send each DAEO an email with a list of individuals believed to be covered filers. OGE requests that the DAEO confirm the filing status of listed individuals; remove the names of individuals who are no longer filers, with an explanation as to reason for their change in filing status; add the names of any new filers; and correct any other errors. The due date for the DAEO's response will be May 30, 2014.

### **DEADLINES FOR THE 2014 FILING CYCLE**

The following table provides the relevant deadlines for filing annual reports, certifying annual reports, and transmitting the annual reports of PAS officials and DAEOs to OGE.

<u>Filing with Agency</u>	<u>Agency Certification Process Completed</u>	<u>Transmittal to OGE</u>
May 15 (no extension)	July 15	July 28
June 30 (45-day extension)	August 30	September 12
August 15 (90-day extension)	October 15	October 28

Although this chart shows that agencies may transmit some reports to OGE as late as October 28, 2014, the majority of reports are due to OGE by July 28, 2014. Additionally, DAEOs should transmit reports to OGE as soon as possible after agency certification. For its part, OGE is committed to completing its review of reports within 60 days of receipt. DAEOs are asked to help OGE accomplish this commitment by responding to any request for additional information regarding a report within 30 days of the request.

### **NEW THIS FILING SEASON: STATUS REPORTS**

Financial disclosure is the primary tool for identifying and resolving potential conflicts of interest on the part of executive branch officials. An agency's failure to collect and review PAS officials' reports, resolve all conflicts of interest, and obtain OGE's certification in a timely manner places filers at risk of violating criminal conflicts of interest laws. More broadly, it diminishes the credibility of the ethics program and undermines the public's confidence in the integrity of the agency's operations. For these reasons, OGE's Compliance Division will now provide each agency head with a year-end Status Report regarding the annual financial disclosure reports of the agency's PAS officials. Ideally, each Status Report will reflect that the agency has timely provided sufficient information to obtain OGE's certification of all of its PAS reports.

If an agency has not obtained OGE's certification of any PAS report, whether due to the PAS official's failure to file or the agency's failure to provide OGE with requested information, the Status Report will identify the name(s) of the PAS official(s) whose reports OGE has not certified. If the agency does not provide any missing reports and any information necessary to obtain OGE's certification within 30 days of the Status Report, OGE will write to the agency head again. In this second communication, OGE will request a written response within 30 days regarding the agency's plan to remediate the deficiency in its financial disclosure program. OGE will ask that the response be signed by either the agency head or an official at the PAS level who has direct supervisory authority over the highest ranking filer whose report remains unfiled or uncertified.

OGE's Financial Disclosure Branch is available to assist agencies in meeting the financial disclosure deadlines for PAS officials. DAEOs and Alternate DAEOs with questions about reviewing the financial disclosure reports of PAS officials may contact Barbara Mullen-Roth, Assistant Director for Compliance and Chief of the Financial Disclosure Branch, at *Barbara.Mullen-Roth@oge.gov* or (202) 482-9233. Ethics staff requiring assistance with regard to the transmission of reports to OGE may contact Lori Kelly, 278 File Room Manager, at *Lori.Kelly@oge.gov* or (202) 482-9306.