Financial Disclosure

Standards of Conduct Office
Office of General Counsel
Department of Defense

2020

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Handy References

- SOCO Website: https://dodsoco.ogc.osd.mil/ (New!)
  - EC Deskbook – NOT to be cited. “Hornbook” style compilation
  - Advisories
  - Handouts, Guides & Samples
- OGE Website: https://oge.gov/
  - Public Financial Disclosure Guide
  - Confidential Financial Disclosure Guide
  - Advisories
  - Learning Modules

FINANCIAL DISCLOSURE: Purpose

Primary Purpose:

Serve as a tool for employees, supervisors and ethics officials to identify & prevent potential conflicts of interest.

Benefits:

- Maintain public confidence in DoD
- Provide evidence if violations occur

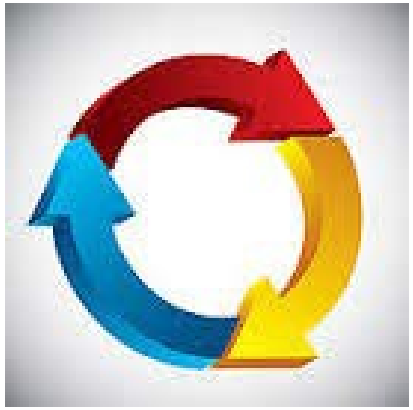
Ethics Counselor's Role

- EC responsibility is to review financial disclosure reports for compliance with all applicable ethics laws and regulations and identify potential conflict of interest or impartiality concerns.
- EC responsibilities do not include:
  - Determining the underlying legality of a particular company's business practices.
  - Assessing the effect of a particular holding on other Federal requirements, such as security clearances.

FINANCIAL DISCLOSURE: Process

Program Management

- Meet program deadlines
- Identify filers
- Notify and educate filers and supervisors
- Record keeping



Disclosure Review

- Technical review
- Conflict of interest analysis
- Remedies, as warranted
- Certification/Signature

FINANCIAL DISCLOSURE: Electronic Filing

- Electronic filing (FDM or Integrity) is mandatory for ALL disclosure reports (278 & 450)
  - DAEO or designee may except for OGE 450s where not feasible (e.g., filers with no CAC or no DoD computer access)
  - OGE 278 – DSD Memorandum "Mandatory Electronic Filing of Public Financial Disclosure Reports", November 25, 2015
  - OGE 450 - DSD Memorandum "Mandatory Electronic Filing of Confidential Financial Disclosure Reports", July 19, 2016

FINANCIAL DISCLOSURE: Electronic Filing

Benefits of Electronic Filing:

- Ethics Officials –
  - Properly entered data feeds annual OGE questionnaire.
  - Data Tracking - Easily track filing and review status
  - Automated routing to supervisor and PGE certification (public filers)
  - Commenting & Attachment functions – provides continuity & avoids duplication
- Filers –
  - Pre-population makes subsequent filing a breeze
  - Reporting wizard and instructions for each screen

FINANCIAL DISCLOSURE: Electronic Filing

Programs:

- Financial Disclosure Management (FDM) system – OGE 450s only
  - Army is Executive Agent
  - CAC access
  - Will still serve as repository for OGE 278s previously filed in system

- Integrity system – OGE 278s only
  - OGE system but uses OMB Max for authentication
  - CAC enabled, but not required.
  - Filers can make spouses, accountants, or others “Designees”
  - With filer permission, reviewers can make changes to reports without being Designee or returning for amendment
  - Entries can be moved between parts (vice deleted and re-entered)
  - OGE 278T – filer self-assigns and can pre-populate annual or term

FINANCIAL DISCLOSURE: Electronic Filing

Tips:

- Maintain Notice Templates for use in FDM and/or Integrity (New entrant, annual, termination, supervisory, delinquencies, etc.)
- Ensure accurate data entry
  - Filer type
  - Appointment dates
  - Proper use of “override due date” vice “record an extension”
  - Proper use of “Delete report” vice “Admin close” – removal of assignment
- Use commenting & attachment functions!
- Use Management Reports!

PUBLIC FINANCIAL DISCLOSURE

OGE 278
&
OGE 278-T

PUBLIC FINANCIAL DISCLOSURE

(OGE Form 278, dated Jul 2020)

OGE Form 278e (Updated July 2020) (Expires 12/31/21)
U.S. Office of Government Ethics; 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001)

Report Type:	
Year (Annual Report only):	
Date of Appointment/Termination:	

UNITED STATES OFFICE OF GOVERNMENT ETHICS
Preventing Conflicts of Interest in the Executive Branch

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information				
Last Name	First Name	MI	Position	Agency

Other Federal Government Positions Held During the Preceding 12 Months:

Name of Congressional Committee Considering Nomination (Nominees only):

Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:	
Signature:	Date:

Agency Ethics Official's Opinion – On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below)	
Signature:	Date:
Other Review Conducted By:	
Signature:	Date:
U.S. Office of Government Ethics Certification (if required):	
Signature:	Date:

Comments of Reviewing Officials:

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OGE Form 278: Assistance

- Public Financial Disclosure Guide – Online Interactive or .pdf

  https://www.oge.gov/Web/278eGuide.nsf

- Employment Assets & Income AND Retirement Accounts (Parts 2 & 5)
  - "Employment Related" = all "active" non-investment assets or income acquired or maintained through a current or former employer or through activities other than passive investing. Income includes salary, bonuses, fees, prizes, winnings, and honoraria.
  - "Retirement Accounts" - Includes all retirement accounts, whether or not acquired through an employer, such as pensions, 401K, 403B, IRAs, etc.
  - "Income" – Does not include income in deferred tax retirement accounts unless distributions received.

OGE Form 278: Who Files?

- Generals & Admirals (O-7 and above)
- Senior Executive Service (SES, career and non-career) & Senior Level (SLs)
- Non-GS employees (including IPAs, and SGEs) with basic rate of pay 120% + of GS 15, step 1 ($131, 239 as of January 2020)
- PAS (Presidential Appointees with Senate Confirmation)
- Political Appointees (Schedule C) (regardless of income, unless OGE excepted)
- Civilians formally detailed to positions covered by 2, 3, & 5 above
- Reserve and National Guard officers (O-7 and above) if they served on active duty 61 + days/CY

Exception: If expected to work *less than 61 days/CY*

OGE Form 278: Who Files?

Detailees & General/Flag Officers on JDA:

- Supervisory and EC review is best done where filer is currently working, but ownership of reports and responsibility for compliance tracking is home organization.
- *Example:* GO/FO serving as agency head for Defense Agency, the Defense Agencies would review, certify and issue any cautionary/remedial guidance. But, filer resides within Military Service filing system org structure. Each service has set up JDA orgs in Integrity, with primary JDA ECs assigned in all roles. The primary at the JDA must then assign ethics roles (e.g., alternates and supervisors) at the local level.

OGE Form 278: PGE Certification

- OGE 278 filers must certify that:
  - They are aware of disqualification and employment restrictions; and
  - They have not violated them
  - Also provides required cooling off period notice.
  - FDM & Integrity provide as part of e-signing/submission.

OGE Form 278: Extensions

- Agency Extension: 90 days total.
  - Initial - up to 45 days; granted by DAEO (or designee), for “good cause shown.”
  - Additional Agency Ext – like above, up to 45 days; granted by DAEO (or designee), but must be in writing, for “good cause shown.”
- Combat Zone: Automatic extension for 180 days after return from deployment in war zone, or release from hospital.

OGE Form 278

New Entrant Filing Deadline, Timelines & Info

Deadlines:

- New Entrants: Within 30 days of assuming duties*
- SGEs: Within 15 days of 61st day of duty
- Nominees: Between nomination and 5 days after transfer of nomination to Senate

**Not applicable to employee leaving a covered position within last 30 days*

OGE Form 278: New Entrant

Part No.	Reporting Period	Report Data For:
1. Filer's Positions Held Outside United States Government	Preceding Two Calendar Years to Filing Date	You
2. Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*	You
3. Filer's Employment Agreements and Arrangements	As of Filing Date	You
4. Filer's Sources of Compensation Exceeding $5,000 in a Year	Preceding Two Calendar Years to Filing Date	You
5. Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year to Filing Date*	Your Spouse
6. Other Assets and Income	Preceding Calendar Year to Filing Date*	You, Your Spouse, and Dependent Children
7. Transactions	N/A – Leave this Part blank	N/A – Leave this Part blank
8. Liabilities	Preceding Calendar Year to Filing Date*	You, Your Spouse, and Dependent Children
9. Gifts and Travel Reimbursements	N/A – Leave this Part blank	N/A – Leave this Part blank

OGE Form 278:

Annual Filing Deadline, Timelines & Info

Deadlines:

- Due Date: No earlier than January 1 and no later than May 15.
- Not Required for anyone appointed after November 1 of the previous CY

OGE Form 278: Annual

Part	Reporting Period	Report Data For
1. Filer's Positions Held Outside United States Government	Preceding Calendar Year to Filing Date	You
2. Filer's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year	You
3. Filer's Employment Agreements and Arrangements	Preceding Calendar Year to Filing Date	You
4. Filer's Sources of Compensation Exceeding $5,000 in a Year	N/A – Leave this Part blank	N/A – Leave this Part blank
5. Spouse's Employment Assets & Income and Retirement Accounts	Preceding Calendar Year	Your Spouse
6. Other Assets and Income	Preceding Calendar Year	You, Your Spouse, and Dependent Children
7. Transactions	Preceding Calendar Year*	You, Your Spouse, and Dependent Children
8. Liabilities	Preceding Calendar Year	You, Your Spouse, and Dependent Children
9. Gifts and Travel Reimbursements	Preceding Calendar Year*	You, Your Spouse, and Dependent Children

OGE Form 278:

Termination Filing Deadline, Timelines & Info

Deadlines:

- May be submitted up to 15 Days prior to departure. (PA-16-06)
- Due Date: NLT 30 days after termination — after expiration of all permissive and terminal leave.
- Combined annual/termination report permissible if employee leaves between May 15 and Aug 13.
- Not required for employees assuming another OGE Form 278 filing position within 30 days.

OGE Form 278: Termination

Part	Reporting Period	Report Data For:
1. Filer's Positions Held Outside United States Government	End of Period Covered by Last Report to Term Date	You
2. Filer's Employment Assets & Income and Retirement Accounts	End of Period Covered by Last Report to Term Date	You
3. Filer's Employment Agreements and Arrangements	End of Period Covered by Last Report to Term Date	You
4. Filer's Sources of Compensation Exceeding $5,000 in a Year	N/A – Leave this Part blank	N/A – Leave this Part blank
5. Spouse's Employment Assets & Income and Retirement Accounts	End of Period Covered by Last Report to Term Date	Your Spouse
6. Other Assets and Income	End of Period Covered by Last Report to Term Date	You, Your Spouse, and Dependent Children
7. Transactions	End of Period Covered by Last Report to Term Date*	You, Your Spouse, and Dependent Children
8. Liabilities	End of Period Covered by Last Report to Term Date	You, Your Spouse, and Dependent Children
9. Gifts and Travel Reimbursements	End of Period Covered by Last Report to Term Date*	You, Your Spouse, and Dependent Children

OGE 278-T: Periodic Transaction Report

- Who: All OGE 278 filers
- When:
  - Covered as soon as assume filing position.
  - Must file earlier of (1) 45 days after the transaction; or (2) 30 days after notification of the transaction.
- What: All individual transactions of securities for filer, spouse, and dependent child that meet reporting threshold (valued >$1,000).

OGE 278-T: Periodic Transaction Report

- Exclude (278-T Only):
  1. Individual transactions of securities for filer, spouse, and dependent child below reporting threshold (valued <$1,000).
  2. Cash accounts
  3. Real estate
  4. Excepted investment funds & underlying holdings thereof
  5. Qualified blind or diversified trust, or an excepted trust
  6. Treasury bills, notes, and bonds;
  7. Life insurance or annuities;
  8. Assets in a Federal retirement program (e.g., TSP).

NOTE: *Must still report transactions for Items 1, 4, & 6 on next Annual OGE 278 report if they meet the reporting threshold*

OGE 278-T: Periodic Transaction Report

- Extensions:
  - Permissible. Same as OGE Form 278.
  - Unique to Ts - can grant before or after deadline (see OGE LA 12-04).

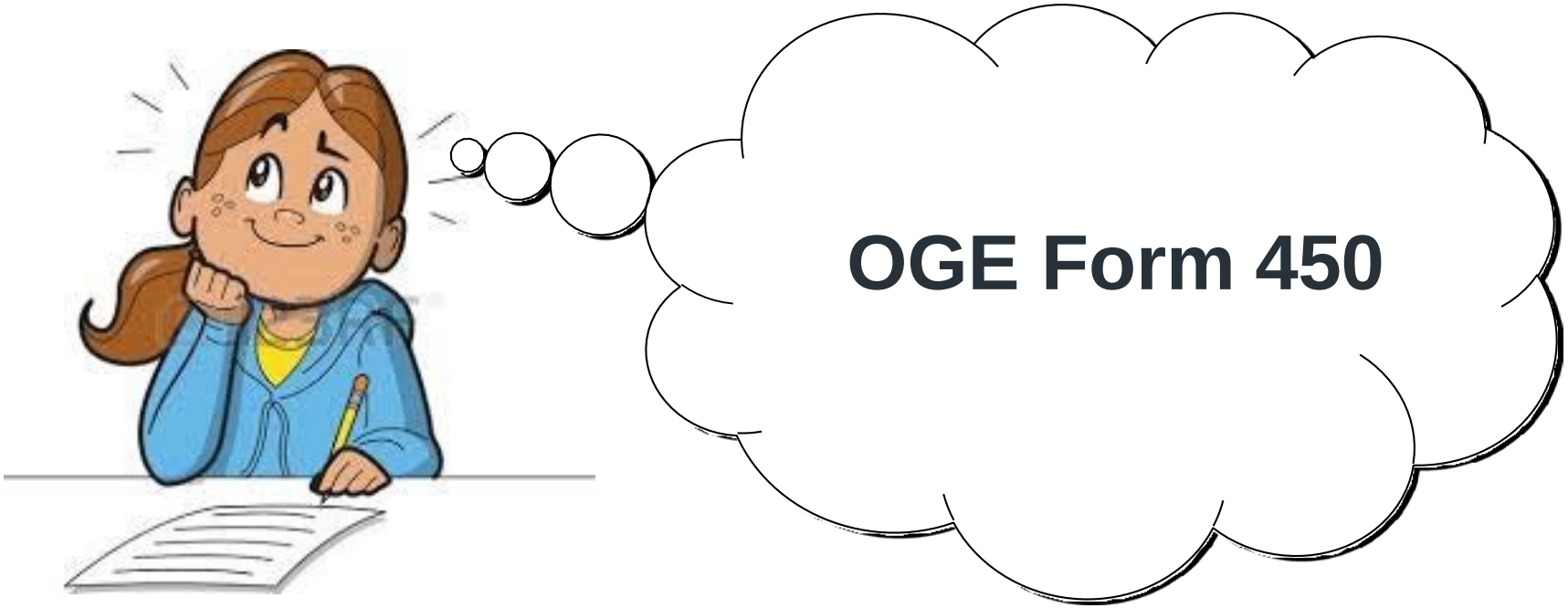
OGE Form 278: Release of Reports

- All OGE certified OGE 278 reports (e.g., PAS & DAEO) are accessible via OGEs website.
- Access to reports requires submission (manual or online) of an OGE Form 201.
  - Note: Form 201 must be properly completed and signed, to include providing names of filers for whom reports are requested.
- Reports are releasable 30 days after submission, regardless of whether perfected or certified.
  - Drafts and reports still within the first 30 days of submission are not releasable.
  - You can ask requester if they would like to wait for the final report – most will.

OGE Form 278: Enforcement

- 30 Day Grace Period is not an automatic extension.
- Personal $200 fee for late filing
- Notice and Waiver
- Agency debt collection
- Worse…referral to DOJ (required) & $50,000 + fine.

CONFIDENTIAL FINANCIAL DISCLOSURE



CONFIDENTIAL FINANCIAL DISCLOSURE

(OGE Form 450, dated Aug 2020)

OGE Form 450, 5 CFR Part 2634, Subpart I
U.S. Office of Government Ethics (Aug. 2020)
Expires 11/30/21

Form Approved
OMB No. 3209-0006

Date Received by Agency	Page Number

CONFIDENTIAL FINANCIAL DISCLOSURE REPORT

Executive Branch

Employee's Name (*Print last, first, middle initial*)		**E-mail Address**
Position/Title		**Grade**
Agency	**Branch/Unit and Address**	
Work Phone	**Reporting Status** New Entrant ☐ Annual ☐	**If New Entrant, Date of Appointment to Position (*mm/dd/yy*)**
Check box if Special Government Employee (SGE) ☐	An SGE is an executive branch officer or employee who is retained, designated, appointed, or employed to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for a period not to exceed 130 days during any consecutive 365-day period.	
If an SGE, Mailing Address (*Number, Street, City, State, ZIP Code*)		

Step 1: Read the instructions for Parts I through V on the following pages.

Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	**Yes** ☐	**No** ☐
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	**Yes** ☐	**No** ☐
III. I have reportable outside positions for myself.	**Yes** ☐	**No** ☐
IV. I have reportable agreements or arrangements for myself.	**Yes** ☐	**No** ☐
NOTE: Statement V is for annual filers only. It does not apply to new entrants and SGEs. **V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children.**	**Yes** ☐	**No** ☐

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

Signature of Employee	**Date (*mm/dd/yy*)**

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CONFIDENTIAL FINANCIAL DISCLOSURE

PART	REPORTING PERIOD		INDIVIDUALS COVERED
	New Entrant	Annual	
PART I Assets and Income	12 Months Preceding the Date of Filing	Preceding Calendar Year	Filer, Spouse, and Dependent Children
PART II Liabilities	12 Months Preceding the Date of Filing	Preceding Calendar Year	Filer, Spouse, and Dependent Children
PART III Outside Positions	12 Months Preceding the Date of Filing	Preceding Calendar Year	Filer Only
PART IV Agreements or Arrangements	12 Months Preceding the Date of Filing	Preceding Calendar Year	Filer Only
PART V Gifts and Travel Reimbursements	Not Applicable	Preceding Calendar Year	Filer, Spouse, and Dependent

CONFIDENTIAL FINANCIAL DISCLOSURE

OGE Updates Public Financial Disclosure Regulations eff. January 2019

(LA 18-10)

- Revised threshold for reportable income from “over $200” to “over $1000”
- Removed requirement to report an agreement to participate in a defined contribution plan to which former employer no longer contributes
- Removed requirement to report diversified fund held in an employee benefit plan
- New Entrants – no longer need to report holdings below $1000 value even if generated over $1000 in income

OGE Form 450: Your Job

Manage the program

- Limit the number of filers!
- Review Reports
- Counsel and Remedy Conflicts

OGE Form 450: Program Notes

- Maintain filer list (by name/position)
- Conduct annual review of “covered positions”
- Utilize Action Officers (AO) / FDM POCs for processing
- Use new entrant, annual and late notices –Draft templates

OGE Form 450: Who Files?

RULE: Those not required to file OGE 278 but in a "covered position" (or detailees)

a) Military: COs, XOs, Heads/Deputy Heads of:

- NAVY: shore installations with more than 500 employees
- Army, Air Force, Marines: all bases, installations, and air wing activities

OGE Form 450: Who Files?

b) Special Government Employees: Consultants, or those on temporary duty for 130 days or less in any 365 day period, including reservists and Nat'l Guard.*

* *Army, Navy, and OSD have made separate determinations to exclude reservists from filing unless a supervisor determines that their duties trigger the filing requirement under 5 C.F.R. 2634.904(a)*

OGE Form 450: Who Files?

c)Military & Civilian Employees: GS-15 or below and military personnel below 0-7, when the following circumstances apply:

1.The Agency concludes they "participate personally & substantially" through decision or exercise of significant judgment, and without substantial supervision, in taking official action for:

- Contracting or procurement;
- Administering grants, subsidies or licenses;
- Regulating or auditing any non-Federal entity; or
- Other activities in which the final decision may have a direct and substantial economic impact on the interest of any non-Federal entity.

2. Supervisor determines position requires filing to avoid real or apparent conflicts of interest.

OGE From 450: Who Files?

d. Other Civilian Employees:

- Intergovernmental Personnel Act (IPA) appointees.
- Those not required to file OGE 278 but detailed to “covered positions” for more than 60 days.
- CORs – as determined by CO IAW DoDI 5000.72.

OGE 450: Who Files?

Exclusions:

- Agency heads may exclude positions with:
  - Remote possibility of conflict of interest; or
  - Low level of responsibility

OGE 450: Who Files?

Excluded Positions:

- OSD and the Military Services specifically exclude non-procurement personnel Govt purchase card holders who make annual purchases totaling less than the simplified acquisition threshold and whose duties would not otherwise require them to file.
- Army, Navy, and OSD have excluded Reservists unless the supervisor determines otherwise.
- No right to appeal agency filing determination beyond agency head or designee

OGE 450: New Entrant Reports

Who files?

- New employees
- Non-filer personnel whose duties change in a way that now requires filing
- Non-filer personnel promoted into filing position
- SGE (always New Entran*ts*)

Transfers within 30 days – just get a copy of their prior 450

OGE 450: New Entrant Reports

Filing Deadline, Timelines & Info

Deadlines:

- Must be filed within 30 days of assuming a designated filing position or for non-designated positions, notification that new duties now requiring filing
- SGEs must have reports filed prior to assuming duties
- Extensions (up to 90 Days - admin or Combat Zone)

Timelines & Information:

- Reporting Period: 12-month period prior to signature

OGE 450: Annual Reports

Filing Deadline, Timelines & Info

Deadlines:

- February 15 (or next business day)
- No automatic extensions
- Document all extensions
    - Admin Ext: Ethics Counselor (or designee) may grant extensions (90 days)
    - Combat zone ext: deployed or away from permanent duty station (90 days)

Timelines & Information:

- Must have been employed in covered position 60+ days during prior calendar year
- Reporting Period: previous calendar year
- If exception to FDM, use correct OGE Form 450 version
- No more OGE 450-A (Obsolete)

OGE 450: Enforcement

- No $200 Filing Fee
- Ultimate Threat: Reassignment / Removal
- If report is late, request administrative action
- Get command support / escalate up the chain
- OGE annual reporting requirements

FINANCIAL DISCLOSURE: Commonalities

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FINANCIAL DISCLOSURE: Common Rules

<u>Rules that apply to ALL financial disclosures</u>:

- New Entrant reports due 30 days after filer assumes position (except SGE/detailee)
- Extension for filing reports must be for “good cause” and cannot exceed 90-days. Extensions beyond 45-days must be in writing. Record in filing system.
- Due dates that fall on a non-business day roll to the next business day.
- Retain reports for 6 years from date of receipt (absent investigative/litigation hold).

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FINANCIAL DISCLOSURE: Reviews

- Reports ***must be certified within 60-days*** of agency receipt unless the reports require additional information or remedial action. *(PA-11-04)*
  - Use filing system functions to record events that "end initial review" by requesting additional information or requesting amendment
- Report should stand alone – make sure substantive information is in the report or documented in a manner that is part of the report ("of record" or "public" comments or end notes).
- Attach caution notices and/or DQs if no centralized filing system or for detailees & GO/FOs
- Educate filers:
  - Over-reporting is ill-advised and public reports may not be redacted before release.
  - Proper reporting helps them going forward (pre-populating future reports, transaction reporting).

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Financial Disclosure: Reviews

Review Process:

- Prompt supervisory review for conflicts
- Ethics office review:
  - Intermediate review for technical compliance (optional)
  - Ethics Counsel review
  - Obtain any required clarifications/information/amendments – this will end initial review. Be sure to use system functionality to record as evidence that 60 day requirement has been met. "End Initial Review"
  - Implement remedial action, if any (Caution, DQ, etc.)
  - Annotate report with all revisions, clarifications, remedial action taken- use filing system functions to record comments/memos and attach relevant document
  - Certify/sign report

FINANCIAL DISCLOSURE: Program

Good program tracking system is critical!

- Get monthly HR reports of:
  - New SES promotions, O-7 promotions (not frocking), and new employees at appropriate pay level for OGE 278 filing
  - Onboarding, transferring and terminating employees for all filer types

Good data tracking is critical!

- Electronic systems do this for you!
- Be sure you are using functions and entering data correctly
- Use Management Reports
- Purge reports after 6 years, unless investigative/litigation hold.

FINANCIAL DISCLOSURE: Program

- Offer training on filling out reports
- Include Supervisory review in AET
- Use software tools (e.g., FDM, Integrity)
- Be available for questions
- Maintain written procedures/templates
- Train legal support staff
- Enlist leadership support

FDM Management Reports – Disclosure Detail Report

Disclosure Detail Report

Export

Filter(s): Mode: Show My | Form Type: OGE 450 | Year: 2020 | Apply Filters

Show 25 entries

Year	Filer Name	Email	Org Unit	Filer Category	Report Type	Review Status	Extension Days	Current Due Date	Submission Date	Supervisor Signature Date	End Initial Review Date
2020	Ackerman, James B	lorren.e.hansen.ctr@mail.mil	Bug-5776		OGE 450 Annual	Draft	0	02/18/2020			
2020	ACOSTA, XAVIER	lorren.e.hansen.ctr@mail.mil	Demo Counters		OGE 450 New Entrant	Under Review - Filer Signed	0	06/06/2020	05/07/2020		07/08/2020
2020	AHERN, JAMES	lorren.e.hansen.ctr@mail.mil	Bug-5776		OGE 450 Annual	Draft	0	02/18/2020			
2020	Armstrong, JOSHUA S	joshua.i.robbins.ctr@mail.mil	estasdfsd		OGE 450 New Entrant	Not Started	0	03/19/2020			
2020	AUSTIN, STEVEN	thomas.a.berens.ctr@mail.mil	Steve Sub Org		OGE 450 New Entrant	Not Started	0	06/14/2020			
2020	AUSTIN, STEVEN	thomas.a.berens.ctr@mail.mil	Steve Sub Org		OGE 450 Annual	Not Started	0	02/18/2020			
2020	Beta, AIR-177	lorren.e.hansen.ctr@mail.mil	Beta Org		OGE 450 New Entrant	Under Review - Additional Information Requested	0	10/03/2020	09/03/2020	09/03/2020	09/03/2020
2020	Beta, Amended_179	ASD26.sec@us.army.mil	Beta Org		OGE 450 New Entrant	Under Review - Amendment in Progress	0	10/03/2020	09/03/2020		
2020	Beta, FS_175	ASD22.sec@us.army.mil	Beta Org		OGE 450 New Entrant	Under Review - Filer Signed	0	10/03/2020	09/03/2020		
2020	Beta, RFA_178	ASD25.sec@us.army.mil	Beta Org		OGE 450 New Entrant	Under Review - Amendment Requested	0	10/03/2020	09/03/2020	09/03/2020	09/03/2020
2020	Beta, SS_176	ASD23.sec@us.army.mil	Beta Org		OGE 450 New Entrant	Under Review - Supervisor Signed	0	10/03/2020	09/03/2020	09/03/2020	
2020	BIGGIN, WILBUR	lorren.e.hansen.ctr@mail.mil	Lorren Sub Org		OGE 450 Annual	Under Review - Amended	88	05/16/2020	07/06/2020		07/08/2020
2020	BIGGIN, WILBUR	lorren.e.hansen.ctr@mail.mil	Lorren Sub Org		OGE 450 New Entrant	Under Review - Filer Signed	0	08/09/2020	07/10/2020		
2020	Black, Lorrena D	lorren.e.hansen.ctr@mail.mil	Lorren Sub Org		OGE 450 Annual	Under Review - Filer Signed	0	03/03/2020	06/10/2020		06/22/2020
2020	BOTA, STEVEN	thomas.a.berens.ctr@mail.mil	Steve Sub Org		OGE 450 New Entrant	Not Started	0	04/25/2020			

Integrity Management Reports – Reports in System

Management Reports

REPORTS: List of reports in system
AGENCY: Department of Defense -- DAEO Agency
GROUP: Test
Go | Reset
INCLUDE SUB-GROUPS
ITEM: All
TYPE: All
YEAR: All
REVIEW STATUS: All
CREATED FROM
CREATED TO

Export to Excel | Customize Display
20 records per page | Search:

FILER NAME	ITEM	YEAR	GROUP	AGENCY CERTIFICATION / CLOSED DATE	OGE CERTIFICATION / CLOSED DATE	REPORT ASSIGNED DATE	EXTENSION	DUE DATE	TERMINATION DATE
Monday, Renee M	Periodic Transaction Report	2019	Test			11/20/2019		12/20/2019	
Henck, Harrold K	Periodic Transaction Report	2019	Test			11/21/2019		12/21/2019	
Henck, Harrold K	Periodic Transaction Report	2019	Test			11/22/2019		12/22/2019	
Monday, Renee M	New Entrant Report	2019	Test			10/23/2019		11/20/2019	
Henck, Harrold K	New Entrant Report	2019	Test			11/21/2019		12/21/2019	
Sheehan, Devon Romig	New Entrant Report	2019	Test			11/21/2019		12/16/2019	

QUESTIONS?

DoD Standards of Conduct Office:

- Comm: (703) 695-3422
- E-mail: osd.soco@mail.mil or osd.financialdisclosure@mail.mil
- Website: https://dodsoco.ogc.osd.mil (New!)

(*See informational slides below.*)

Public

v.

Confidential

OGE Form 450 v 278

OGE Form	450	278
Who Files	• Military - COs, XOs, Heads & Deputy Heads… • Civilian/Military - GS 15/O-6 and below with certain duties • Special Gov't Employees • Most IPAs/HQEs • Certain Reservists & National Guard	• Political Appointees • DAEO • SES • General Officers (O-7 & above, including reservists w/ 61+ days service) • SES/SL (and detailees) • Certain IPA/HQE • Senior Mentors

OGE Form 450 v 278

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Reports	• New Entrant (NE) • Annual (A)	• New Entrant • Annual (A) • Termination (Term) • Annual/Term (A/Term)
Deadlines	• NE: w/in 30 days • A: no earlier than 1 Jan, no later than 15 Feb. • Combat Ext: only 90-days	• NE: w/in 30 days • A: no earlier than 1 Jan, no later than 15 May. • Term: w/in 30 days of sep. • A/Term: w/in 30 days of sep but nlt 15 Aug • Combat Ext: 180 days

OGE Form 450 v 278

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Reportable Info	• No non-sector mutual funds • No values • No asset income amount	• All investment assets, including diversified mutual funds • Value ranges • Income amount & type
NE Reportable Periods	• NE: 12 months preceding assuming duties of covered position	• NE: Varies by Part - last 1-2 calendar years through date of filing

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Penalty	• Administrative action for failure to file	• Criminal, civil and administrative penalties for: failure to file, false information, etc.