From: News and Info for Ethics Officials on behalf of Ethics Mailing List

To: OGE-ETHICSINFO@LISTSERV.GSA.GOV

**Subject:** Use OGE Public Financial Disclosure Resources this Filing Season

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Spring has arrived, and that means public financial disclosure season is here. You may already have public financial disclosure reports (OGE Form 278s) awaiting your review.

OGE supports agencies' public financial disclosure programs by creating and maintaining resources to help you develop the skills of new reviewers, hone your own skills, support your filers, and navigate the filing season effectively.

There are live training opportunities and other OGE resources available to assist you.

### **Live Training Opportunities Coming Soon:**

The Institute for Ethics in Government (IEG) will provide live training opportunities this filing season, including:

- A "Navigating to OGE's 278 Resources" demo to provide an overview of the OGE website and where to find public financial disclosure resources, which is tentatively scheduled for Wednesday, April 30 from 1 to 2pm EDT.
- Peer-to-Peer (P2P) Workshops on public financial disclosure, which are tentatively scheduled for Tuesday, May 6 from 1 to 2:30pm EDT and Wednesday, May 7 from 10 to 11:30am EDT.
- How-To Sessions for novice reviewers on analyzing unfamiliar and/or challenging entries reported in annual OGE Form 278s, which are tentatively scheduled for Thursdays, May 22 and June 5, from 1 to 2pm EDT. The entries IEG Instructors will analyze during each How-To Session will come directly from the ethics community. To share yours, please complete this one-question survey any time before Friday, May 23.

These opportunities will be announced via the OGE Listserv. Stay tuned to register and attend.

#### **On-Demand Courses and Training Materials:**

The courses and training materials linked to below can be found among many others in <u>the IEG's On-Demand Library</u>.

#### Public Financial Disclosure Review Curriculum (May 2020)

This curriculum includes videos to learn about and practice public financial disclosure review. Its <u>"Resources for Conducting Substantive Legal Review of 278e" document</u>, listed under the course materials, provides other resources for conducting substantive legal reviews of OGE Form 278s (e.g., web guides, job aids, training videos). These are organized by what filers are required to report: assets and income, liabilities, outside positions, agreements or arrangements, and gifts and travel reimbursements.

## Trusts: Financial Disclosure and Conflicts Analysis

This training provides an overview of the basics needed to discuss trust interests with employees. It also addresses the reporting and conflicts implications of various interests in trusts, as well as different types of trusts. Finally, this training outlines several ways for resolving conflicts arising from trust interests.

#### Additional Resources:

### Public Financial Disclosure Guide

This Guide is an interactive tool to assist in the administration and review of OGE Form 278s. It offers helpful instructions, illustrations of sample language, definitions of terms, and plain language answers to frequently asked questions. View the "For Ethics Official" section for comprehensive guidance geared toward ethics officials.

### **Analyzing Potential Conflicts of Interest**

This series of guidance documents provides conflicts analyses for various types of employment interests, investment interests, and liabilities.

## 2025 Calendar of Important Ethics Dates (PDF)

This calendar identifies key deadlines for executive branch ethics programs and is especially helpful for reminders related to the 2025 public financial disclosure season.

PA-25-01: Deadlines and Procedures for Annual Public Financial Disclosure Reports of Executive Branch Employees (2025 Filing Cycle) (PDF)

This program advisory (PA) reminds agencies of annual public financial disclosure deadlines and provides procedures for the reports agencies are required to transmit to OGE, including explanations for why OGE may decline to certify a report transmitted to it for review and information on the year-end status letters OGE provides to agency heads

regarding the processing of the previous year's annual reports transmitted to OGE.

FOR FILERS – Resources for Financial Disclosure Filers

This webpage contains helpful resources for filers, including filer aids that explain certain reporting requirements and the What to Gather Before You Start Your Public Financial Disclosure Report (2024) (PDF) one-pager, which provides a list of documents and information that filers need to collect before completing an OGE Form 278.

**INTEGRITY (Electronic Filing System) Resources:** 

**INTEGRITY News** 

This news page provides information *Integrity* users need to know, such as recent system updates and links to helpful tools and resources. These resources include opportunities to attend upcoming *Integrity* training events and access to training materials (e.g., slide decks).

**INTEGRITY Listserv Information** 

To stay informed, all agency ethics staff with a role in *Integrity* are invited to join its listserv. Send a blank email to <u>OGE-Integrity-subscribe-request@listserv.gsa.gov</u> to self-subscribe.

Help Desk Information\*

Email: <a href="mailto:INTEGRITY@oge.gov">INTEGRITY@oge.gov</a>

Hours: Monday through Friday from 8am to 4:30pm EDT

\*Please note that this Help Desk supports administrators and agency ethics officials.

# **Legal Advisories:**

The legal advisories (LAs) listed below were issued in the last two years and may be relevant to your review of OGE Form 278s. All of OGE's LAs can be found in its <u>Legal Research Search Collection</u>.

LA-24-10: Determining Whether a "Thematic" Fund is a Sector or Diversified Fund for Purposes of the Regulatory Exemptions Applicable to Mutual Funds

This LA provides guidance on when "thematic" mutual funds are "sector funds" for purposes of the regulatory exemptions to 18 U.S.C. § 208.

LA-24-04: Conflicts of Interest Considerations and Financial Disclosure Reporting Requirements for Managed Investment Accounts

This LA highlights the potential conflict of interest risks and financial disclosure reporting

challenges for employees who invest in managed accounts, including those managed by roboadvisors.

# LA-24-03: Release of OGE's Updated Public Financial Disclosure Guide

This LA discusses the changes in the updated Public Financial Disclosure Guide.

# LA-24-02: Bitcoin Exchange-Traded Products

This LA discusses the application of certain ethics rules to several Bitcoin exchange-traded products ("Bitcoin ETPs"). As described in the LA, these Bitcoin ETPs do not qualify for regulatory exemptions to the criminal conflict of interest law, 18 U.S.C. § 208. The Bitcoin ETPs do qualify as excepted investment funds for purposes of financial disclosure reporting.

LA-23-12: Identifying and Preventing Violations of 18 U.S.C. § 208 Arising from Digital Asset Ownership

This LA provides guidance on when an employee may have a disqualifying financial interest under 18 U.S.C. § 208 arising from ownership of digital assets.

LA-23-08: Increased Gifts and Travel Reimbursements Reporting Thresholds for Financial Disclosure Reports and Nonsponsor Widely Attended Gatherings Gift Exception Ceiling

This LA discusses the most recent amendments to the gifts and travel reimbursements reporting thresholds at 5 C.F.R. §§ 2634.304 and 2634.907(g) and the widely attended gatherings gift exception ceiling for nonsponsor gifts of free attendance at 5 C.F.R. § 2635.204(g)(3).

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