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Roles for Supervisors in Confidential Financial Disclosure

Why do we do financial disclosure?

Certification Statement
Confidential Disclosure
ONLY Purpose

What is a conflict of interest?

Government Work
Holdings and Other Interests

Why must we avoid conflicts?

- Introduce bias
- Harm our work
- Can result in challenges and investigations
- Some are crimes
What do I need to know to prevent conflicts?

- Employee’s position and duties (what your employees do at work)
- Employee’s financial holdings and business relationships (the stuff on the 450)

Who files a 450?

See 5 CFR 2634.904

- GS-15 (or equivalent) and below
- Responsibilities and duties affecting nonfederal entities
- As determined by the agency

How can I help ensure the right people file?
What gets filed?

- OGE Form 450 (2019 version)
- Alternative report format
What’s the process for review?

- What types of assignments might the employee participate in?
- Could any interests disclosed on the Form 450 be affected by those assignments?

Outside activities

1. Does the agency require prior approval? If so, did the filer obtain it?
2. Is the outside activity in any way related to the employee’s duties?
Part I – Common Entries

- Securities/Sector Funds
- Current / Prior non-federal employer
- Spousal non-federal employer
- Outside business/earned income

Reporable Information – Go to the last page to see examples of how to report assets and income.
Part III – Common Entries

Filer’s ONLY:

- Prior employer
- Outside employment
  - Including consulting
  - Including employee-owned business
- Certain outside activities
Part IV – Common Entries

Filer’s ONLY

- Agreements for outside employment
  - Including teaching, speaking and writing
- Retirement and other benefits from prior employer(s)
- Leaves of absence

What if I find a potential conflict?

- Contact ethics office ASAP
- Ask employee to stop working on anything that might pose a conflict
- Work with ethics office and employee to resolve the conflict
How else can I help prevent conflicts?

- Think about conflicts when assigning work
- Tell the ethics office about promotions, changes in roles, or transfers to new jobs
- Remind employees to avoid conflicts when starting new work, acquiring new assets, or engaging in non-federal activities (spouses, too)
- Tell the ethics office when you are thinking about hiring

Thank You