

*United States  
Office of Government Ethics*

**2017 AGENCY ETHICS PROGRAM QUESTIONNAIRE**

**PART 1. INTRODUCTION**

Executive branch agencies are required to submit an annual report to the United States Office of Government Ethics (OGE) concerning certain aspects of their ethics programs (Section 402(e)(1) of the Ethics in Government Act of 1978, as amended). Your response(s) to OGE's Annual Ethics Program Questionnaire (Questionnaire) serve as your annual report.

OGE uses the data collected through the Questionnaire in many ways, including sharing information about the entire executive branch ethics program with the public, Congress, and the ethics community. OGE also uses the information to carry out its oversight role, to gain knowledge about individual programs, as well as the overall ethics program, and to make informed decisions about resource allocations and priorities. OGE posts a summary of Questionnaire responses as well as each agency's unedited responses on OGE's website. Therefore, please ensure your responses are suitable for publication.

OGE encourages each agency to use the annual exercise of completing the Questionnaire as an opportunity to evaluate your ethics program.

**DUE DATE:** By regulation, the Questionnaire is due to OGE by **February 1, 2018**. (5 CFR § 2638.207(a)).

**PART 2. INSTRUCTIONS**

Your response to this Questionnaire should reflect the 2017 calendar year (i.e., 1/1/2017 through 12/31/2017), except where specified. The answers provided should reflect the aggregated numbers for **your agency in total**. OGE will only accept **one submission per agency**.

Throughout the Questionnaire you will be offered an opportunity to provide comments or explanations for your responses. Please use these comment sections to explain any discrepancies between levels of required activity and actual activity. These comment sections should also be used to explain significant changes from your 2016 report. After OGE has reviewed your Questionnaire submission, you may be contacted for follow-up.

**If you have any questions, please contact Wendy Pond at [wgpond@oge.gov](mailto:wgpond@oge.gov).**

### **PART 3. DEFINITIONS**

**Agency Head:** For purposes of this Questionnaire, in the case of an agency headed by more than one person, the chair or comparable member of such agency.

**D.C Metro Area:** For purposes of this Questionnaire, D.C. Metro Area means the District of Columbia, DC; Calvert County, MD; Charles County, MD; Prince George's County, MD; Arlington County, VA; Clarke County, VA; Culpeper County, VA; Fairfax County, VA; Fauquier County, VA; Loudoun County, VA; Prince William County, VA; Rappahannock County, VA; Spotsylvania County, VA; Stafford County, VA; Warren County, VA; Alexandria city, VA; Fairfax city, VA; Falls Church city, VA; Fredericksburg city, VA; Manassas city, VA; Manassas Park city, VA; Jefferson County, WV; and, Silver Spring-Frederick-Rockville, MD Metropolitan Division Frederick County, and Montgomery County.

**Full-time Agency Employees:** For purposes of this Questionnaire, the term “full-time agency employees” includes employees detailed to another agency. It also includes officers, but does not include enlisted members, of the uniformed services.

**Special Government Employee (SGE):** For purposes of this Questionnaire, the term “special Government employee” (SGE) means an 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 not more than 130 days during any period of 365 consecutive days. The term “SGE” does not include enlisted members of the Armed Forces. It does, however, include these categories of officers or employees:

- Part-time United States commissioners;
- Reserve officers of the Armed Forces and officers of the National Guard of the United States (unless otherwise officers or employees of the United States) while on active duty solely for training or serving involuntarily.

**PART 4. ORGANIZATION/RESOURCES**

1. Agency: \_\_\_\_\_

2. Number of full-time agency employees as of December 31, 2017: \_\_\_\_\_

3. Information about the Designated Agency Ethics Official (DAEO):

	DAEO
a. Vacant (as of December 31, 2017)	<input type="checkbox"/> Yes <input type="checkbox"/> No ( <i>go to #3c</i> )
b. When did the position become vacant?	Month/Year ( <i>skip to #4</i> )
c. Name	
d. Title	
e. Time in current DAEO position	<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1 - 4 years <input type="checkbox"/> 5 - 9 years <input type="checkbox"/> 10 or more years
f. Total years performing ethics duties	
g. Grade level	<input type="checkbox"/> Executive Schedule <input type="checkbox"/> SES or equivalent <input type="checkbox"/> GS 15 <input type="checkbox"/> GS 14 and below
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% <input type="checkbox"/> 26-50% <input type="checkbox"/> 51-75% <input type="checkbox"/> 76-100%
i. Was the DAEO eligible to retire as of December 31, 2017?	<input type="checkbox"/> Yes <input type="checkbox"/> No
j. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <input type="checkbox"/> political appointee
k. Has OGE been provided a copy of the DAEO's designation letter? ( <i>response required only for DAEOs who have served less than 1 year in the current DAEO position</i> )	<input type="checkbox"/> Yes <input type="checkbox"/> No

4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

	ADAEO
a. Position Vacant (as of December 31, 2017)	<input type="checkbox"/> Yes <input type="checkbox"/> No ( <i>go to #4c</i> )
b. When did the position become vacant?	Month/Year ( <i>skip to #5</i> )
c. Name	
d. Title	
e. Time in current ADAEO position (years)	<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1 - 4 years <input type="checkbox"/> 5 - 9 years <input type="checkbox"/> 10 or more years
f. Total years performing ethics duties	
g. Grade level	<input type="checkbox"/> Executive Schedule <input type="checkbox"/> SES or equivalent <input type="checkbox"/> GS 15 <input type="checkbox"/> GS 14 and below
h. Percent of time spent on ethics	<input type="checkbox"/> 0-25% <input type="checkbox"/> 26 -50% <input type="checkbox"/> 51-75% <input type="checkbox"/> 76-100%
i. Was the ADAEO eligible to retire as of December 31, 2017?	<input type="checkbox"/> Yes <input type="checkbox"/> No
j. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <input type="checkbox"/> political appointee
k. Has OGE been provided a copy of the ADAEO's designation letter? ( <i>response required only for DAEOs who have served less than 1 year in the current DAEO position</i> )	<input type="checkbox"/> Yes <input type="checkbox"/> No

5. Number of employees who performed ethics program duties in 2017; e.g., financial disclosure, education and training, advice and counseling, program administration.

Duty Station	Approximate amount of time spent each week performing ethics duties					TOTAL
	Less than 1 hour per week	1-10 hours per week	11-20 hours per week	21-30 hours per week	31-40 hours per week	
	(up to .025 FTE*)	(up to .25 FTE*)	(up to .5 FTE*)	(up to .75 FTE*)	(up to 1 FTE*)	
D.C. Metro area						
Outside the D.C. Metro area						
<b>TOTAL</b>						

\*FTE = Full Time Equivalent

Example: The table below provides an example of an agency with 13 employees that performed ethics program duties in 2017.

Duty Station	Approximate amount of time spent each week performing ethics duties					TOTAL
	Less than 1 hour per week	1-10 hours per week	11-20 hours per week	21-30 hours per week	31-40 hours per week	
	(up to .025 FTE*)	(up to .25 FTE*)	(up to .5 FTE*)	(up to .75 FTE*)	(up to 1 FTE*)	
D.C. Metro area	1	0	2	2	1	6
Outside the D.C. Metro area	1	3	3	0	0	7
<b>TOTAL</b>	2	3	5	2	1	13

6. Does the DAEO/ADAEO have supervisory authority over the employees identified in question #5?

- Yes (skip to #8)
- No (go to #7)
- Not Applicable (skip to #8)

7. Indicate which elements of the ethics program have been delegated outside of the supervisory chain of the DAEO or ADAEO. Check all that apply.

- Assessment of program performance
- Confidential financial disclosure program
- Ethics advice and counseling
- Ethics education and training
- Public financial disclosure program
- Other (specify) \_\_\_\_\_

8. Do contractors support the ethics program?

- Yes (*go to #9*)
- No (*skip to #10*)

9. Describe the extent of their support. \_\_\_\_\_

10. Identify the agency ethics officials who have ethics duties as a distinct element in their **performance standards**. Check all that apply.

- DAEO
- ADAEO
- All ethics officials (excluding DAEO/ADAEO)
- Some ethics officials (excluding DAEO/ADAEO)
- None

**ADDITIONAL COMMENTS FOR PART 4.** Please indicate the question number to which the comment corresponds.

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**PART 5. PROGRAM ADMINISTRATION**

11. Use the following scale to rate the amount of time your agency spends to administer each item. The first six categories exclude time devoted to SGEs.

**Time Spent Scale:** 1= No time 2=Limited amount of time 3=Moderate amount of time  
4=Significant amount of time 5=Very significant amount of time

	No Time	Limited	Moderate	Significant	Very Significant
Advice and counseling	1	2	3	4	5
Confidential financial disclosure program	1	2	3	4	5
Disciplinary process for violations	1	2	3	4	5
Education and training	1	2	3	4	5
Outside activity approval	1	2	3	4	5
Public financial disclosure program	1	2	3	4	5
Special Government Employee activities	1	2	3	4	5
Other (specify)_____	1	2	3	4	5

12. Please estimate the *percentage* of time your agency spends on administering the following:

- a. Confidential financial disclosure program \_\_\_\_\_
- b. Public financial disclosure program \_\_\_\_\_
- c. 201 Requests \_\_\_\_\_

13. Are additional resources needed for the ethics program? (e.g., budgetary, human capital, technology, etc.)

- Yes (*go to #14*)
- No (*skip to #15*)

14. Which additional resources are needed? Check all that apply.

- Budgetary
- Human Capital
- Technology
- Other (specify)\_\_\_\_\_

15. Describe one concrete action the head of your agency took in 2017 to support or strengthen the agency's ethics program:

\_\_\_\_\_

16. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2017?
- Yes  
 No
17. Which of the following tools did your agency use to ensure short- and long-term continuity of operations (succession planning) of its ethics program in 2017? Check all that apply.

**Professional Development**

- Competency/skills gap assessment  
 Developmental assignments (e.g., detail assignments, cross training, job rotation, use of agency developmental programs such as interns, fellows, or leadership development)  
 Individual development plans  
 Mentoring  
 Structured courses (e.g., classroom training, webinars, online modules, etc.)  
 Provided by OGE  
 Provided by my agency  
 Provided by another agency  
 Other (specify) \_\_\_\_\_  
 None

**Programmatic tools**

- Job Aids  
 Knowledge library (intranet, videos, shared drives, etc.)  
 Resources assessment (personnel and/or financial)  
 Written standard operating procedures  
 Other (specify) \_\_\_\_\_  
 None

18. Did your agency (e.g., ethics office, Inspector General, General Counsel, etc.) conduct a self-assessment to evaluate any aspect of the ethics program in 2017?

- Yes (*go to #19*)  
 No (*skip to #20*)

19. What did you assess? Check all that apply.

- Accuracy of advice and counsel  
 Timeliness of advice and counsel  
 Consistency of advice and counsel  
 Administration of confidential financial disclosure program  
 Administration of public financial disclosure program  
 Compliance with applicable ethics laws and regulations  
 Employee knowledge before training  
 Employee knowledge after training  
 Employee satisfaction with training offered  
 Employee perceptions about the agency's ethical culture



- Employee perceptions about the ethics program
- Employee knowledge of the ethics rules
- Knowledge and skills of ethics officials
- Other (specify) \_\_\_\_\_

20. Do you have written policies or procedures in place for the following? Check all that apply.

- Collection of confidential financial disclosure reports
- Collection of public financial disclosure reports
- Following up with delinquent confidential financial disclosure filers
- Following up with delinquent public financial disclosure filers
- Public availability of public financial disclosure reports
- Review/evaluation of confidential financial disclosure reports
- Review/evaluation of public financial disclosure reports
- Issuance of notice of ethical obligations in written offers of employment
- Provision of initial ethics training
- Issuance of ethics notice to new supervisors

21. Does your agency provide ethics program services for any board, commission, or agency that is independent of your agency?

- Yes (please provide the names of the board, commission, or agency) \_\_\_\_\_
- No

22. Please list any significant accomplishments your ethics program achieved in 2017.

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23. Please list the greatest challenges facing your ethics program in the short term (next 1-3 years).

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**ADDITIONAL COMMENTS FOR PART 5.** Please indicate the question number to which the comment corresponds.

**PART 6. EDUCATION AND TRAINING**

24. How many employees (excluding special Government employees (SGE)) were required to receive Initial Ethics Training (IET) by December 31, 2017? \_\_\_\_\_
- a. How many of those employees received IET within the 3-month requirement? \_\_\_\_\_
  - b. How many of those employees received IET beyond the 3-month requirement? \_\_\_\_\_
  - c. How many of those employee have not received IET as of today? \_\_\_\_\_

If applicable, please explain why some employees received IET beyond the 3-month requirement or have yet to receive IET. \_\_\_\_\_

*Example:* An employee came on board December 15, 2017. You do not need to count the employee toward the number of employees who were required to have received IET in calendar year 2017 because you have until March 2017 to provide the employee IET.

25. Did the office(s) responsible for issuing ethics notices to prospective employees, pursuant to 5 C.F.R. 2638.303, provide the DAEO with the certification required pursuant to 5 C.F.R. 2638.310? *(Response required only from agencies with more than 1,000 or more full-time employees – see Q2.)*

- Yes
- No (please explain)

26. Did any office not under the direct supervision of the DAEO provide initial ethics training, pursuant to 5 C.F.R. 2638.304? *(Response required only from agencies with more than 1,000 or more full-time employees – see Q2.)*

- Yes
  - Did that office provide the certification required pursuant to 5 C.F.R. 2638.310?
    - Yes
    - No (please explain)
- No
- Not Applicable

27. How many non-supervisory positions at or below the GS-8 grade level, or the equivalent, were excluded from the requirement to receive IET during 2017? \_\_\_\_\_

28. Did the head of the agency complete either initial ethics training or annual ethics training in 2017?

- Yes
- No (please explain)
- Not Applicable

29. Did the deputy head of the agency (e.g., Deputy Secretary, Deputy Administrator, etc.) complete either initial ethics training or annual ethics training in 2017?

- Yes
- No (please explain)

Not Applicable

30. How do you deliver IET to new employees? Check all that apply.

- Classroom instruction (in-person)
- Instructor-led web-based
- One-on-one briefings
- Satellite broadcast/videoconference
- Self-paced web-based
- Video
- Written materials
- Other (specify) \_\_\_\_\_

31. Who developed the IET training materials? Check all that apply.

- My agency
- OGE
- Another agency

How did you access the training materials? Check all that apply.

- OGE resource (e.g, OGE's page on MAX.gov, Desk Officer, etc.)
- Directly from the agency
- Other (specify)\_\_\_\_\_
- Other (specify) \_\_\_\_\_

32. How many new appointees were required to receive ethics briefings by December 31, 2017 (5 CFR 2638.305)? \_\_\_\_\_

a. How many of those appointees received their briefing no later than 15 days after the leader(s) appointment? \_\_\_\_\_

b. How many of those employees received their briefing beyond the 15 day requirement?

c. How many of those employees have yet to receive their briefing as of today?

If applicable, please explain why some appointees received their briefing beyond the 15 day requirement or have yet to receive their briefing. \_\_\_\_\_

33. Who provided the briefings to the appointees? \_\_\_\_\_

34. Required Annual Ethics Training

<b>Type of covered employees</b> ( <i>Include SGE filers</i> )	<b># Required</b>	<b># Received (of those required)</b>
Public filers (OGE Form 278e) – Executive Schedule Level I or Level II		
Public filers (OGE Form 278e) - Non-- Executive Schedule Level I or Level II		
Confidential filers (OGE Form 450, 450A, and OGE-approved alternative confidential financial disclosure forms)		
Other employees required by 2638.307(a) (employees appointed by the President; employees of the Executive Office of the President; Contracting Officers; or, other employees designated by the head of the agency.)		
<b>TOTAL</b>		

If applicable, please explain discrepancies between the number of employees who were required to receive training and the number of employees who received training: \_\_\_\_\_

35. How do you deliver annual ethics training to Executive Schedule Level I or Level II employees? Check all that apply.

- Classroom instruction (in-person)
- Instructor-led web-based
- One-on-one briefings
- Video
- Satellite broadcast/videoconference
- Written materials
- Other (specify) \_\_\_\_\_

36. How do you deliver annual ethics training to non-- Executive Schedule Level I or Level II public filers? Check all that apply.
- Classroom instruction (in-person)
  - Instructor-led web-based
  - One-on-one briefings
  - Self-paced web-based
  - Video
  - Satellite broadcast/videoconference
  - Written materials
  - Other (specify) \_\_\_\_\_
37. How do you deliver annual ethics training to confidential filers and other covered employees not required to file a public report? Check all that apply.
- Classroom instruction (in-person)
  - Instructor-led web-based
  - One-on-one briefings
  - Self-paced web-based
  - Video
  - Satellite broadcast/videoconference
  - Written materials
  - Other (specify) \_\_\_\_\_
38. Who developed the annual training materials? Check all that apply.
- My agency
  - OGE
  - Another agency
    - How did you access the training materials? Check all that apply.
      - OGE (e.g, OGE's page on MAX.gov, Desk Officer, etc.)
      - Directly from the agency
      - Other (specify) \_\_\_\_\_
39. Did you provide annual ethics training to other employees *not otherwise required by regulation* to receive training?
- Yes
  - No
40. Did you provide additional, specialized ethics training during 2017?
- Yes (*go to #41*)
  - No (*go to end of this section*)

41. Which groups did you target? Check all that apply.

- All agency personnel (e.g., including individuals not required by regulation to receive annual training)
- HR personnel
- IT personnel
- Procurement personnel
- Supervisors
- Other (specify) \_\_\_\_\_

**ADDITIONAL COMMENTS FOR PART 6.** Please indicate the question number to which the comment corresponds.

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**PART 7. ADVICE AND COUNSELING**

42. From the list below, select the three topics that your employees most **frequently** sought guidance on in 2017.

Conflicting financial interests
Gift acceptance
Financial disclosure reporting
Impartiality in performance of official duties
Misuse of position, government resources and information
Outside employment/activities
Post-employment restrictions
Travel, subsistence, and related expenses from non-federal sources
Other (specify)_____

43. Has your agency ethics program implemented any of the following practices? Check all that apply.

- Conduct customer satisfaction survey(s)
- Periodic supervisory review of advice given
- Guided discussion among staff
- Memorialize advice and counsel
  - All
  - Some
- Use advice and counsel templates
- Use a database Check all that apply:
  - to track timeliness
  - to conduct research
  - to identify topics for training
- Other (specify)\_\_\_\_\_
- None

44. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2017: \_\_\_\_\_

45. How do you make employees aware of the availability of post-employment counseling? Check all that apply.

- Part of out-processing
- Emails
- Training
- Regulation or policy
- Other (specify) \_\_\_\_\_
- None
- Not Applicable

**ADDITIONAL COMMENTS FOR PART 7.** Please indicate the question number to which the comment corresponds.

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## PART 8. PUBLIC FINANCIAL DISCLOSURE

46. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2017, *excluding SGEs*, and the number of reports actually filed (i.e., received in hand) by December 31, 2017.

### OGE Form 278e Reports Required to be Filed in CY 2017

OGE Form 278e Reports		PAS <sup>2</sup>	Non-Career SES <sup>3</sup>	Career SES <sup>3</sup>	Schedule C	Other <sup>4</sup>
Nominee/ New Entrant	Required					
	Filed					
Annual	Required					
	Filed					
Termination	Required					
	Filed					
Combination <sup>1</sup>	Required					
	Filed					
Total	Required					
	Filed					

<sup>1</sup> Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.

<sup>2</sup> Presidential appointees confirmed by the Senate.

<sup>3</sup> Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.

<sup>4</sup> Includes members of the Uniformed Services, Administrative Law Judges, Senior Level employees (SES Equivalent), etc.

*Example:* For new entrant and termination reports: If an employee starts/ leaves the agency on December 15, 2017, and s/he files a new entrant/termination report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant/termination report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 15. You instead would include the employee in your 2018 Questionnaire's new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. \_\_\_\_\_

47. Does the human resources office(s) notify the DAEO of all appointments to and terminations from public filing positions?
- Yes
  - No (please explain)
  - Not Applicable

48. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports, *excluding SGEs*.

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278e Reports			

49. Number of periodic transaction reports filed, *excluding SGEs*: \_\_\_\_\_

\* Note about counting: Count the total number of periodic transaction reports filed. *Example 1:* If two employees each file 5 periodic transaction reports during the calendar year, report “10” in the table above. *Example 2:* If an employee files one report each month, each report is counted separately. Report “12” in the table.

50. Extensions and late fees for periodic transaction reports, *excluding SGEs*:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278 T Reports			

51. Number of public financial disclosure filers reported in calendar year 2017 to the Attorney General for failure to file: \_\_\_\_\_

52. How many requests for public financial disclosure reports did you receive in 2017: \_\_\_\_\_

53. Does your agency use an automated system (e.g., Excel, Access, custom database) to track the administration of the financial disclosure program?

- Yes
- No

54. Did you receive timely notification of all employees required to file a new entrant financial disclosure report?

- Yes
- No

55. Does your agency require an intermediate review by someone other than ethics staff (e.g., supervisors and team leads) for public financial disclosure reports?
- Yes  
 No
56. What steps do you take to collect delinquent public financial disclosure reports? Check all that apply.
- Repeated reminders to the filer  
 Notify supervisor  
 Certified letter to the filer  
 Notify agency head or other senior official  
 Referral to Department of Justice  
 Other (specify) \_\_\_\_\_  
 None  
 Not Applicable
57. Does your agency use an electronic financial disclosure filing system (e-filing system)? Note: This includes *Integrity*.
- Yes (go to #58)  
 No (skip to end of this section)
58. Which system does your agency use? Check all that apply.
- Integrity* (if only *Integrity* is selected, go to Part 9)  
 Other (specify)\_\_\_\_\_ (if *Integrity* and Other or just Other are selected go to #59)
59. Indicate your fiscal year 2017 actual and fiscal year 2018 projected costs for using the e-filing system. Note: Because OGE does not charge fees to use *Integrity*, there are no reportable costs associated with the use of *Integrity*.
- a) total FY 2017 actual costs: \_\_\_\_\_
- b) total FY 2018 projected costs: \_\_\_\_\_
- c) amount paid to a non-federal vendor in FY 2017:\_\_\_\_\_
- d) amount projected to be paid to a non-federal vendor in FY 2018:\_\_\_\_\_
- e) amount paid to a federal agency in FY 2017:\_\_\_\_\_
- f) amount projected to be paid to a federal agency in FY 2018:\_\_\_\_\_
- g) amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2017:\_\_\_\_\_
- h) amount projected for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2018:\_\_\_\_\_

i) number of public financial disclosure filers who filed electronically in FY 2017:\_\_\_\_\_

j) number of public financial disclosure filers projected to file electronically in  
FY 2018:\_\_\_\_\_

k) number of confidential financial disclosure filers who filed electronically in  
FY 2017:\_\_\_\_\_

l) number of confidential financial disclosure filers projected to file electronically in  
FY 2018:\_\_\_\_\_

60. Indicate which forms your agency uses the e-filing system for. Check all that apply.

Public Financial Disclosure (OGE Form 278e)

Periodic Transaction (OGE Form 278-T)

Confidential Disclosure Forms (OGE Form 450, 450A, or OGE-approved alternative form)

**ADDITIONAL COMMENTS FOR PART 8.** Please indicate the question number to which the comment corresponds.

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**PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE**

61. Report the number of confidential financial disclosure reports required to be filed by December 31, 2017, *excluding SGEs*, and the number of reports actually filed by December 31, 2017.

Confidential financial disclosure reports required to be filed in CY 2017:

Type of Report	# Required to File (by December 31)	# Filed		
		OGE Form 450	OGE Form 450A	OGE- approved alternative form
OGE Form 450				
Total				

*Example:* For new entrant reports: If an employee starts the agency on December 15, 2017, and files a new entrant report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 16. You instead would include the employee in your 2018 Questionnaire’s new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. \_\_\_\_\_

62. Number of OGE 450, 450A, or OGE-approved alternative forms granted filing extensions in 2017:  
\_\_\_\_\_

63. What steps do you take to collect delinquent confidential financial disclosure reports?

- Repeated reminders to the filer
- Notify supervisor
- Certified letter to the filer
- Notify agency head or other senior official
- Other (specify) \_\_\_\_\_
- None
- Not Applicable

**ADDITIONAL COMMENTS PART 9.** Please indicate the question number to which the comment corresponds.

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**PART 10. REMEDIES AND ENFORCEMENT OF STANDARDS OF CONDUCT, CRIMINAL, AND CIVIL STATUTES**

64. Number of public financial disclosure filers who took specific remedial actions because of information on a new entrant, annual, or termination report (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. § 208 waiver, reassignment, etc.) in 2017: \_\_\_\_

Don't know/don't track

65. Number of individual remedial actions taken because of information on a new entrant, annual, or termination public financial disclosure (OGE Form 278e) report in 2017:

Recusals \_\_\_\_\_

Divestitures \_\_\_\_\_

Resignations from outside positions \_\_\_\_\_

Reassignments \_\_\_\_\_

Other not listed (specify)\_\_\_\_\_

Don't know/don't track

66. Number of public financial disclosure filers who took specific remedial actions because of information on periodic transaction reports (e.g., divestiture, resignation from outside position, written disqualification, U.S.C. § 208 waiver, reassignment, etc.) in 2017: \_\_\_\_\_

Don't know/don't track

67. Number of remedial actions taken because of information on a periodic transaction report in 2017:

Recusals \_\_\_\_\_

Divestitures \_\_\_\_\_

Reassignments \_\_\_\_\_

Other not listed (specify)\_\_\_\_\_

Don't know/don't track

68. Number of § 208(b)(1) waivers granted in 2017 \_\_\_\_\_

69. Number of § 208(b)(1) waivers provided to OGE in 2017\_\_\_\_\_

70. Number of § 208(b)(3) waivers granted in 2017 \_\_\_\_\_

71. Number of § 208(b)(3) waivers provided to OGE 2017 \_\_\_\_\_

72. Number of disciplinary actions taken based wholly or in part upon violations of the Standards of Conduct provisions (5 CFR part 2635) in 2017. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: \_\_\_\_\_

Of those, how many were disciplinary actions were taken wholly or in part upon violations of:

Subpart A \_\_\_\_\_

Subpart B \_\_\_\_\_

Subpart C \_\_\_\_\_

Subpart D \_\_\_\_\_

Subpart E \_\_\_\_\_

Subpart F \_\_\_\_\_

Subpart G \_\_\_\_\_

Subpart H \_\_\_\_\_

73. Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. §§ 203, 205, 208, and 209, in 2017. For purposes of this question, disciplinary actions include removals, demotions, suspensions, and written reprimands or their equivalents: \_\_\_\_\_

Of those, how many were disciplinary actions taken based wholly or in part upon violations of:

18 U.S.C. §203 \_\_\_\_\_

18 U.S.C. §205 \_\_\_\_\_

18 U.S.C. §208 \_\_\_\_\_

18 U.S.C. §209 \_\_\_\_\_

74. Number of referrals made to the Department of Justice of potential violations of the criminal conflict of interest statutes (including 18 U.S.C. §207) in 2017: \_\_\_\_\_

a. How many of those referrals were accepted for prosecution \_\_\_\_\_

b. How many of those referrals were declined for prosecution \_\_\_\_\_

c. How many of those referrals were pending DOJ's decision as of December 31, 2017 \_\_\_\_\_

d. How many of those referrals resulted in disciplinary or corrective action \_\_\_\_\_

e. How many of those referrals resulted in a determination not to take disciplinary or corrective action \_\_\_\_\_

f. How many of those referrals are pending a determination as to whether disciplinary or corrective action will be taken \_\_\_\_\_

75. Which individual(s) is responsible for filing the Notification of Conflict of Interest Referral (Form 202) with OGE? Check all that apply.

DAEO/ADAEO

General Counsel

Agency Head

IG

Other (specify) \_\_\_\_\_

76. Did your agency submit all referral(s) and disposition(s) of the referral(s) to OGE via OGE Form 202 (as required by 5 C.F.R. 2638.206(a))?

Yes

No

Not Applicable

**ADDITIONAL COMMENTS FOR PART 10.** Please indicate the question number to which the comment corresponds.

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**PART 11. ETHICS PLEDGE ASSESSMENT**

77. Were any full-time non-career appointees (e.g., Presidentially Appointed Senate Confirmed (PAS), Presidentially Appointed (PA), non-career Senior Executive Service (SES), Schedule C, etc.) appointed to or by your agency from January 1 through December 31, 2017?

- Yes
- No (*skip to #83*)

*NOTE: For guidance on what constitutes a full-time non-career appointee for purposes of the Ethics Pledge see [LA 17-03](#) available at [www.oge.gov](http://www.oge.gov).*

Please type comments in the box below.

78. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2017, and indicate the number who did and did not sign the Ethics Pledge. (*NOTE: Please include all appointees who did not sign, regardless of whether or not they were required to sign. Additional explanatory information is requested in the next question.*)

Number of Full-Time Non-Career Appointees	Type of Full-Time Non-Career Appointees by Category					
	PAS	PA	Non-career SES	Schedule C	Other	Total
Appointed 01/01/2017 – 12/31/2017						
Signed the Ethics Pledge						
Did not sign the Ethics Pledge						

If for any field above you are unable to provide a complete response, please explain in the box below. You may also add additional comments.

79. For each appointee who did not sign the Ethics Pledge, find the appropriate rationale(s) and indicate the total number of appointees who fit into that category.

Rationale for Not Signing the Ethics Pledge	Number and Type of Full-Time Non-Career Appointees Who Did Not Sign the Ethics Pledge					
	PAS	PA	Non-career SES	Schedule C	Other	Total
a. Occupy an exempt non-policymaking position (Schedule C or other comparable authority)						
b. Appointed without break in service after serving in another position for which the Ethics Pledge was already signed						
c. Other (explain below)						

If other, explain here. You may also use the box below to provide a complete response or to add additional comments.

80. How many appointees appointed between January 1 and December 31, 2017 and subject to the Ethics Pledge were registered lobbyists during the two years prior to their appointment?

**NOTE: If none, enter "0" in the box below**

Please type comments in the box below.

81. Section 3 of Executive Order 13770 provides a waiver mechanism for the restrictions contained in the Ethics Pledge. Indicate below how many waivers were granted; the names of individuals granted waivers by your agency in 2017; and which of the Pledge paragraphs were implicated.

	<b>Number of Ethics Pledge Waivers Granted By Pledge Paragraph</b>	<b>Name(s) of Individual(s) Granted Ethics Pledge Waivers</b>
<b>Paragraph 1</b>		
<b>Paragraph 2</b>		
<b>Paragraph 3</b>		
<b>Paragraph 4</b>		
<b>Paragraph 5</b>		
<b>Paragraph 6</b>		
<b>Paragraph 7</b>		
<b>Paragraph 8</b>		
<b>Paragraph 9</b>		
<b>Other</b> (explain below)		

If other, please explain here. Other comments may also be provided in the box below.

82. If applicable, please provide information on any violations of the Ethics Pledge and enforcement actions taken as a result.

**PART 12. ADVISORY COMMITTEES/ SPECIAL GOVERNMENT EMPLOYEES (SGEs)**

83. Does your agency have any FACA or Non-FACA advisory committees, boards, or commissions?

- Yes (go to #84)
- No (go to #88)

84. Number of FACA advisory committees: \_\_\_\_\_

85. Number of FACA advisory committee members: \_\_\_\_\_

86. Number of non-FACA advisory committees, boards, or commissions: \_\_\_\_\_

87. Number of non-FACA advisory committee, board, or commission members: \_\_\_\_\_

88. Does your agency have any SGEs (as of December 31, 2017)?

- Yes (go to #89)
- No (go to end of this section)

89. Number of special Government employees (SGEs) as of December 31, 2017: \_\_\_\_\_

90. Does your agency have written policies or procedures for designating SGE status?

- Yes
- No
- Not applicable (specify why) \_\_\_\_\_

91. Does the written policy or procedure include consultation with the ethics office?

- Yes
- No
- Not applicable (specify why) \_\_\_\_\_

92. How many SGEs serving on a board, commission, or committee were required to receive IET by December 31, 2017? \_\_\_\_\_

- a. How many of those SGEs received IET before or at the beginning of the first meeting? \_\_\_\_\_
- b. How many of those SGEs received IET after the first meeting? \_\_\_\_\_
- c. How many of those SGEs have not received IET as of today? \_\_\_\_\_

If applicable, please explain why some SGEs received IET after the first meeting or have yet to receive IET. \_\_\_\_\_

93. If yes, which office provides the training? \_\_\_\_\_

94. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2017 and the number of reports actually filed by December 31, 2017.

Financial disclosure reports required to be filed by SGEs in CY 2017:

Type of SGE	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
Advisory Committee Members (FACA)				
Advisory Committee Members (non-FACA)				
Experts/Consultants				
Board Members				
Commissioners				
Other				
<b>TOTAL</b>				

*Example:* For new entrant reports: If an employee starts with the agency on December 15, 2017, and files a new entrant report prior to the end of the calendar year, then you can include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, then you do not have to count that report in your required numbers, because it was not required to be filed until January 15. You instead would include the employee in your 2018 Questionnaire’s new entrant numbers in 2019.

If applicable, please explain discrepancies between the number of reports required to be filed and the actual number of reports filed. \_\_\_\_\_

95. Number of SGEs excluded from all or a portion of the confidential filing requirements per 5 C.F.R. 2634.904(b): \_\_\_\_\_

96. Extensions and late filing fees for SGE financial disclosure reports

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
Number of OGE Form 278e Reports			

97. Number of SGE OGE Form 450 Reports or OGE-Approved Alternative Forms granted filing extensions: \_\_\_\_\_

**ADDITIONAL COMMENTS FOR PART 12.** Please indicate the question number to which the comment corresponds.

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**Point of contact to answer OGE follow up questions regarding this Questionnaire:**

Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

What is the preferred mailing address for the Agency Head, Designated Agency Ethics Official, Chief Human Capital Officer, and Inspector General:

Agency Head

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DAEO

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Chief Human Capital Officer

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector General

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ADDITIONAL QUESTIONNAIRE COMMENTS:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_