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.
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):**

<table>
<thead>
<tr>
<th>DAE0</th>
<th></th>
</tr>
</thead>
</table>
| a.  Vacant (as of December 31, 2017) | □ Yes  
□ No (go to #3c) |
| b.  When did the position become vacant? | Month/Year (skip to #4) |
| c.  Name |  |
| d.  Title |  |
| e.  Time in current DAE0 position | □ Less than 1 year  
□ 1 - 4 years  
□ 5 - 9 years  
□ 10 or more years |
| f.  Total years performing ethics duties |  |
| g.  Grade level | □ Executive Schedule  
□ SES or equivalent  
□ GS 15  
□ GS 14 and below |
| h.  Percent of time spent on ethics | □ 0-25%  
□ 26-50%  
□ 51-75%  
□ 76-100% |
| i.  Was the DAE0 eligible to retire as of December 31, 2017? | □ Yes  
□ No |
| j.  Is the DAE0 a career employee or a political appointee? | □ career employee  
□ political appointee |
| k.  Has OGE been provided a copy of the DAE0’s designation letter? | □ Yes  
□ No |

*(response required only for DAE0s who have served less than 1 year in the current DAE0 position)*
4. Information about the Alternate Designated Agency Ethics Official (ADAEO)

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

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

*FTE = Full Time Equivalent

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

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

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.
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

<table>
<thead>
<tr>
<th>Item</th>
<th>No Time</th>
<th>Limited</th>
<th>Moderate</th>
<th>Significant</th>
<th>Very Significant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advice and counseling</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Confidential financial disclosure program</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Disciplinary process for violations</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Education and training</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Outside activity approval</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Public financial disclosure program</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Special Government Employee activities</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Other (specify)</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
</tr>
</tbody>
</table>

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
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.

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

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

________________________________________________________________________________
________________________________________________________________________________
________________________________________________________________________________

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)
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? ________________
### Required Annual Ethics Training

<table>
<thead>
<tr>
<th>Type of covered employees (Include SGE filers)</th>
<th># Required</th>
<th># Received (of those required)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public filers (OGE Form 278e) – Executive Schedule Level I or Level II</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public filers (OGE Form 278e) - Non—Executive Schedule Level I or Level II</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Confidential filers (OGE Form 450, 450A, and OGE-approved alternative confidential financial disclosure forms)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________


PART 7. ADVICE AND COUNSELING

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

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

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
  - [ ] 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.

_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
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

<table>
<thead>
<tr>
<th>OGE Form 278e Reports</th>
<th>PAS²</th>
<th>Non-Career SES³</th>
<th>Career SES³</th>
<th>Schedule C</th>
<th>Other⁴</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nominee/ New Entrant</td>
<td>Required</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Filed</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Annual</td>
<td>Required</td>
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<td></td>
<td>Filed</td>
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<td>Termination</td>
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<td></td>
<td>Filed</td>
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</tr>
<tr>
<td>Combination¹</td>
<td>Required</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Filed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>Required</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td>Filed</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

¹ Includes reports filed to satisfy both annual and termination requirements, as well as new entrant and termination requirements.
² Presidential appointees confirmed by the Senate.
³ Senior Executive Service, Senior Foreign Service, Senior Cryptologic Service, Defense Intelligence Senior Executive Service, etc.
⁴ 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*.

<table>
<thead>
<tr>
<th>Number of OGE Form 278e Reports</th>
<th>Granted filing extension</th>
<th>Granted waiver of late filing fee</th>
<th>Paid late filing fee</th>
</tr>
</thead>
</table>

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*:

<table>
<thead>
<tr>
<th>Number of OGE Form 278 T Reports</th>
<th>Granted filing extension</th>
<th>Granted waiver of late filing fee</th>
<th>Paid late filing fee</th>
</tr>
</thead>
</table>

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:_____

19
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.

_____________________________________________________________________________________

_____________________________________________________________________________________
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:

<table>
<thead>
<tr>
<th>Type of Report</th>
<th># Required to File (by December 31)</th>
<th># Filed</th>
</tr>
</thead>
<tbody>
<tr>
<td>OGE Form 450</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OGE Form 450</td>
<td></td>
</tr>
<tr>
<td></td>
<td>OGE Form 450A</td>
<td></td>
</tr>
<tr>
<td></td>
<td>OGE-approved alternative form</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.
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.
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.*

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.)*

<table>
<thead>
<tr>
<th>Number of Full-Time Non-Career Appointees</th>
<th>Type of Full-Time Non-Career Appointees by Category</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PAS</td>
</tr>
<tr>
<td>Appointed 01/01/2017 – 12/31/2017</td>
<td></td>
</tr>
<tr>
<td>Signed the Ethics Pledge</td>
<td></td>
</tr>
<tr>
<td>Did not sign the Ethics Pledge</td>
<td></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Rationale for Not Signing the Ethics Pledge</th>
<th>Number and Type of Full-Time Non-Career Appointees Who Did Not Sign the Ethics Pledge</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PAS</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Paragraph 1</th>
<th>Number of Ethics Pledge Waivers Granted By Pledge Paragraph</th>
<th>Name(s) of Individual(s) Granted Ethics Pledge Waivers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paragraph 2</td>
<td></td>
<td></td>
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<tr>
<td>Paragraph 3</td>
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<td>Paragraph 4</td>
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<td>Paragraph 7</td>
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<td>Paragraph 8</td>
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<tr>
<td>Paragraph 9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>(explain below)</td>
<td></td>
</tr>
</tbody>
</table>

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:

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

*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

<table>
<thead>
<tr>
<th></th>
<th>Granted filing extension</th>
<th>Granted waiver of late filing fee</th>
<th>Paid late filing fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of OGE Form 278e Reports</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

_____________________________________________________________________________________
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:
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________

30