

*United States
Office of Government Ethics*

2018 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 to OGE's Annual Ethics Program Questionnaire (the Questionnaire) serves 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, 2019**. (5 C.F.R. 2638.207(a)). However, because of the government shutdown, OGE has extended the deadline to March 15, 2019.

PART 2. INSTRUCTIONS

Your response to this Questionnaire should reflect the 2018 calendar year (i.e., 1/1/2018 through 12/31/2018), 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 2017 report. After OGE has reviewed your Questionnaire submission, you may be contacted for follow-up.

FAQs:

Which Internet browser should I use?

How do I save a draft of my response?

How do I access my saved draft and edit the Questionnaire?

Why is the field highlighted yellow?

How do I save a copy of my Questionnaire for my records?

I submitted the Questionnaire but then realized I made an error. Can I still edit my response?

The font is small, can I increase the size?

Can more than one person work on the Questionnaire response?

I accidentally created more than one agency response. Which one should I use?

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 not 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. PROGRAM RESOURCES AND ADMINISTRATION

1. Agency: _____
2. Number of full-time agency employees as of December 31, 2018: _____
3. Information about the Designated Agency Ethics Official (DAEO):

a. Vacant (as of December 31, 2018)?	<input type="checkbox"/> Yes (<i>skip to #4a</i>) <input type="checkbox"/> No
b. 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
c. Total years performing ethics duties	<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
d. 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%
e. Is the DAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <input type="checkbox"/> political appointee
f. Number of reporting levels between the DAEO and the agency head.	

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

a. Vacant (as of December 31, 2018)?	<input type="checkbox"/> Yes (<i>skip to #5</i>) <input type="checkbox"/> No
b. Time in current ADAEO 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
c. Total years performing ethics duties	<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
d. 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%
e. Is the ADAEO a career employee or a political appointee?	<input type="checkbox"/> career employee <input type="checkbox"/> political appointee

5. Number of employees, including the DAEO and ADAEO, who performed ethics program duties in 2018 (e.g., financial disclosure, education and training, advice and counseling, program administration).

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area						
b. Outside the D.C. Metro area						
TOTAL						

*FTE = Full Time Equivalent

Example: The table below provides an example of an agency with 13 employees that performed ethics program duties in 2018.

Duty Station	Number of employees by hours worked each week					TOTAL
	Less than 1 hour per week (up to .025 FTE*)	1-10 hours per week (up to .25 FTE*)	11-20 hours per week (up to .5 FTE*)	21-30 hours per week (up to .75 FTE*)	31-40 hours per week (up to 1 FTE*)	
a. D.C. Metro area	1	0	2	2	1	6
b. Outside the D.C. Metro area	1	3	3	0	0	7
TOTAL	2	3	5	2	1	13

6. In what areas did contractors support the ethics program? Select all that apply.
- Not applicable (no contractors supported the ethics program)
 - IT services (e.g., developing or supporting electronic filing systems, applications, websites, and/or databases, etc.)
 - Administrative support (e.g., tracking filing or training requirements, sending reminders, data entry, etc.)
 - Substantive ethics support (e.g., providing training, initial review of financial disclosures, drafting advice for further review, etc.)
 - Other (please describe)
7. Did another federal agency or federal entity provide ethics services or support to your agency? Do not include contractors, OGE support, or OMB support of MAX.gov.
- Yes (please provide the name of the federal agency or entity and describe the services or support provided) _____
 - No
8. Does your agency's ethics program need additional resources? Check all that apply.
- No additional resources needed
 - Budgetary
 - Human Capital
 - Technology
 - Other (specify) _____
9. Did the agency head meet with the ethics staff to discuss the strengths and weaknesses of the ethics program in 2018?
- Yes
 - No
 - Not applicable (specify why) _____
10. 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 2018?
- Yes
 - No (*skip to #13*)
11. To whom were the results reported? Select all that apply.
- Agency Head
 - DAEO
 - Inspector General
 - Other (specify) _____

12. What kind of changes resulted from the assessment?

- Programmatic changes (please describe) _____
- Policy changes (please describe) _____
- No changes resulted (specify why not) _____
- Not applicable (specify why) _____

13. Of the following required written procedures, which did you have in place? Check all that apply:

- Collection of confidential financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i))
- Collection of public financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i))
- Follow up with delinquent confidential financial disclosure filers (DA-09-03-92)
- Follow up with delinquent public financial disclosure filers (DA-09-03-92)
- Public availability of public financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i))
- Review/evaluation of confidential financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i))
- Review/evaluation of public financial disclosure reports (5 C.F.R. 2638.104(c)(8)(i))
- Issuance of notice of ethical obligations in written offers of employment (5 C.F.R. 2638.303)
- Provision of initial ethics training (5 C.F.R. 2638.304)
- Issuance of ethics notice to new supervisors (5 C.F.R. 2638.306)
- None

ADDITIONAL COMMENTS FOR PART 4. Please indicate the question number to which the comment corresponds. *(not required)*

PART 5. EDUCATION AND TRAINING

14. Did all of 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?

- All of the offices provided the certification to the DAEO
- Some of the offices provided the certification to the DAEO (explain why not all offices) _____
- None of the offices provided the certification to the DAEO (explain why not all offices) _____
- Not applicable because my agency has less than 1,000 employees
- Not applicable because the DAEO's office is responsible for issuing ethics notices to prospective employees

15. How many new agency leaders, as defined in 5 C.F.R. 2638.305(a), were required to receive ethics briefings by December 31, 2018? _____

- a. How many of those leaders received their briefing within 15 days of their appointment? _____
- b. How many of those leaders received their briefing beyond the 15-day requirement? _____
- c. How many of those leaders have yet to receive their briefing as of today? _____

If applicable, please explain why some of the leaders received their briefing beyond the 15-day requirement or have yet to receive their briefing. _____

16. How many employees, *including SGEs*, were required to receive Initial Ethics Training (IET) by December 31, 2018 (5 C.F.R. 2638.304)? Include employees who were excluded, under 5 C.F.R. 2638.304(a), from the requirement to receive the interactive portion of the IET. _____

- 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: If an employee started at the agency on December 15, 2018, and the employee completed IET prior to the end of the calendar year, include the employee in your required and received numbers. If, on January 1, the employee has not completed IET, do not count that employee in your required numbers. Instead, include the employee in your 2019 Questionnaire response in 2020.

17. How many non-supervisory positions at or below the GS-8 grade level, or the equivalent, were excluded from the requirement to receive the *interactive* portion of their initial ethics training during 2018, pursuant to 5 C.F.R. 2638.304(a) (i.e., they received only *written* materials)? _____
18. Did all of the office(s) delegated the responsibility for providing initial ethics training (IET) provide the required certification to the DAEO, pursuant to 5 C.F.R. 2638.310?
- All of the offices provided the certification to the DAEO
 - Some of the offices provided the certification to the DAEO (specify why) _____
 - None of the offices provided the certification to the DAEO (specify why) _____
 - Not applicable because my agency has less than 1,000 employees
 - Not applicable because all IET was provided by an office under the DAEO's supervision
19. Did the head of the agency complete either initial ethics training and/or annual ethics training in 2018?
- Yes
 - No (specify why) _____
 - Not Applicable (specify why) _____

20. Required Annual Ethics Training

Type of covered employees (Include SGE filers)	# Required	# Received (of those required)
a. Executive Schedule Level I or Level II public filers (OGE Form 278e)		
b. All other public filers (OGE Form 278e)		
c. Confidential filers (OGE Form 450, 450A, and OGE-approved alternative confidential financial disclosure forms)		
d. Other employees required by 5 C.F.R. 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.)		
TOTAL		

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

21. Did you provide **annual** ethics training to other employees *not otherwise required by regulation to receive training* (i.e., any other employees not covered by the chart above)?

- Yes (please specify who) _____
- No

22. Did you provide additional, specialized ethics training during 2018 (i.e., beyond any required initial ethics training or annual ethics training)?

- Yes
- No (*skip to next Part*)

23. Which groups did you target for additional, specialized ethics training? Check all that apply.

- All agency personnel (including individuals not required by regulation to receive annual training)
- HR personnel
- IT personnel
- Procurement personnel
- Supervisors
- Other (specify all)

ADDITIONAL COMMENTS FOR PART 5. Please indicate the question number to which the comment corresponds. *(not required)*

PART 6. ADVICE, COUNSELING, AND REMEDIES

24. From the list below, select the three topics that your employees most **frequently** sought guidance on in 2018. Please rate them in order, such that the first topic was the topic on which employees sought guidance the most frequently.

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)_____

25. Number of notification statements of negotiation or recusal under section 17(a) of the STOCK Act submitted to the ethics office in 2018:_____
26. Number of public financial disclosure filers who, in 2018, took specific remedial actions (e.g., divestiture, resignation from outside position, written disqualification, 18 U.S.C. section 208 waiver, reassignment, etc.) because of information on a new entrant, annual, periodic transaction, or termination report (OGE Form 278e or 278-T):_____
- Don't know/don't track

27. Number of individual remedial actions taken in 2018 because of information on a new entrant, annual, periodic transaction, or termination public financial disclosure report:___

a. Recusals _____ Number
 _____ Don't know/don't track

b. Divestitures _____ Number
 _____ Don't know/don't track

c. Resignations from _____ Number
 outside positions _____ Don't know/don't track

d. Reassignments _____ Number
 _____ Don't know/don't track

e. Other not listed _____ Number
 (specify) _____ Don't know/don't track

If Other, specify _____

28. Number of 18 U.S.C. 208 waivers granted in 2018:

	Number Granted in 2018	Number Sent to OGE
a. 208(b)(1) waivers		
b. 208(b)(3) waivers		

If applicable, please explain discrepancies between the number of waivers granted and the number provided to OGE. _____

ADDITIONAL COMMENTS FOR PART 6. Please indicate the question number to which the comment corresponds. *(not required)*

PART 7. FINANCIAL DISCLOSURE PROGRAM MANAGEMENT AND ELECTRONIC FILING SYSTEMS

29. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of appointments to public and confidential financial disclosure filing positions (5 C.F.R. 2638.105(a)(1))?

	In all Cases	In Most Cases	In Some Cases	Never	Not Applicable (specify why, below)
a. Public Filers					
b. Confidential Filers					

If not applicable, specify why. _____

30. How often, within the 15-day deadline, did the human resources office(s) notify the DAEO of terminations from public financial disclosure filing positions (5 C.F.R. 2638.105(a)(2))?

	In all Cases	In Most Cases	In Some Cases	Never	Not Applicable (specify why, below)
Public Filers					

If not applicable, specify why. _____

31. Did your agency use an electronic financial disclosure filing system (e-filing system) in calendar year 2018? Note: This includes *Integrity*.

- Yes
- No (*skip to next Part*)

32. Which system did your agency use?

- Integrity* ONLY (*skip to next Part*)
- Integrity* AND Other (specify) _____
- Other ONLY (specify) _____

33. Indicate for which forms your agency used the “Other” e-filing system. Check all that apply.

- Public Financial Disclosure (OGE Form 278e)
- Periodic Transactions (OGE Form 278-T)
- Confidential Financial Disclosure (OGE Form 450, 450A, or OGE-approved alternative form)

34. Indicate your FY 2018 actual 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*.

	Public (do not include <i>Integrity</i>)	Confidential	
a. Amount paid to a non-federal vendor in FY 2018			
b. Amount paid to a federal agency in FY 2018			
c. Amount for all internal costs associated with operating an e-filing system (e.g., FTE, overhead, etc.) in FY 2018			
Total FY 2018 actual costs			

35. Indicate the number of filers who filed electronically in fiscal year 2018.

	Public (excluding filers in <i>Integrity</i>)	Confidential
Number of financial disclosure filers, not reports, who filed electronically in FY 2018		

ADDITIONAL COMMENTS FOR PART 7. Please indicate the question number to which the comment corresponds. *(not required)*

PART 8. PUBLIC FINANCIAL DISCLOSURE

36. Report the number of public financial disclosure reports (OGE Form 278e) required to be filed by December 31, 2018, *excluding SGEs*, and the number of reports actually filed (i.e., received in hand) by December 31, 2018.

OGE Form 278e Reports		PAS ²	Non-Career SES ³	Career SES ³	Schedule C	Other ⁴	TOTAL
a. Nominee/ New Entrant	Required						
	Filed						
b. Annual	Required						
	Filed						
c. Termination	Required						
	Filed						
d. Combination ¹	Required						
	Filed						
Total	Required						
	Filed						

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), administratively-determined positions, officials in the Executive Office of the President who do not otherwise meet the criteria of another section, etc.

Example for new entrant and termination reports: If an employee started/left the agency on December 15, 2018, and the employee filed a new entrant/termination report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant/termination report, do not count that report in your required numbers. Instead, include the employee in your 2019 Questionnaire response in 2020.

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

37. Number of periodic transaction reports filed, *excluding those filed by SGEs*: _____

Note: 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.

38. Extension and late fees for new entrant, annual, termination, and combination public financial disclosure reports and periodic transaction reports, *excluding those for reports filed by SGEs*.

	Granted Filing Extension	Granted Waiver of Late Filing Fee	Paid Late Filing Fee
a. Number of OGE Form 278e Reports			
b. Number of OGE Form 278-T Reports			

39. Number of public financial disclosure filers reported in calendar year 2018 to the Attorney General for failure to file: _____

40. How many requests for public financial disclosure reports did you receive in 2018? Count each OGE Form 201 as one request, even if it contains a request for documents for multiple individuals. _____

ADDITIONAL COMMENTS FOR PART 8. Please indicate the question number to which the comment corresponds. *(not required)*

PART 9. CONFIDENTIAL FINANCIAL DISCLOSURE

41. Report the number of confidential financial disclosure reports required to be filed by December 31, 2018, *excluding SGEs*, and the number of reports actually filed by December 31, 2018.

	Required	Filed	
		450	
		450A	
		OGE-approved alternative form	
Total			

Example for new entrant reports: If an employee started at the agency on December 15, 2018, and filed a new entrant report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, do not count that report in your required numbers. Instead, include the employee in your 2019 Questionnaire’s new entrant numbers in 2020.

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

42. Number of OGE 450, 450A, or OGE-approved alternative forms granted filing extensions in 2018: _____

ADDITIONAL COMMENTS PART 9. Please indicate the question number to which the comment corresponds. *(not required)*

PART 10. ENFORCEMENT OF STANDARDS OF CONDUCT AND CRIMINAL AND CIVIL STATUTES

43. Number of disciplinary actions taken based wholly or in part upon violations of the Standards of Conduct provisions (5 C.F.R. part 2635) or your agency's supplemental Standards (if applicable) in 2018. 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 (General Provisions)
- _____ Subpart B (Gifts from Outside Sources)
- _____ Subpart C (Gifts Between Employees)
- _____ Subpart D (Conflicting Financial Interests)
- _____ Subpart E (Impartiality in Performing Official Duties)
- _____ Subpart F (Seeking Other Employment)
- _____ Subpart G (Misuse of Position)
- _____ Subpart H (Outside Activities)
- _____ Your agency's supplemental Standards

44. Number of disciplinary actions taken based wholly or in part upon violations of the criminal conflict of interest statutes, 18 U.S.C. sections 203, 205, 208, and 209, in 2018. 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. section 203 (Compensation in Matters Affecting the Government)_____
- 18 U.S.C. section 205 (Claims Against and Matters Affecting the Government)_____
- 18 U.S.C. section 208 (Acts Affecting a Personal Financial Interest)_____
- 18 U.S.C. section 209 (Supplementation of Salary)_____

45. Number of referrals made to the Department of Justice of potential violations of the conflict of interest statutes (18 U.S.C. sections 203, 205, 207, 208, 209), failure to file or filing false public financial disclosures (5 U.S.C. app. section 104 or 18 U.S.C. section 1001), a civil matter involving outside earned income under 5 U.S.C. app. section 501, or outside activities under 5 U.S.C. app. section 502 in 2018: _____

DOJ Referrals

- 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, 2018 _____

Disciplinary Action

- a. How many of those referrals resulted in disciplinary or corrective action _____
- b. How many of those referrals resulted in a determination not to take disciplinary or corrective action _____
- c. How many of those referrals are pending a determination as to whether disciplinary or corrective action will be taken _____

46. 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 (specify why) _____
- Not Applicable (specify why) _____

ADDITIONAL COMMENTS FOR PART 10. Please indicate the question number to which the comment corresponds. *(not required)*

PART 11. ETHICS PLEDGE ASSESSMENT

47. 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, 2018?

- Yes
- No (*skip to #51*)

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.

48. For each category of appointee, provide the number of full-time non-career appointees appointed between January 1 and December 31, 2018, 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
a. Appointed 01/01/2018 – 12/31/2018						
i. Signed the Ethics Pledge						
ii. Did not sign the Ethics Pledge						

If applicable, please explain discrepancies between the number appointed and the number who signed or did not sign the Pledge. _____

If all appointees signed, skip to question 50

49. 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 (please explain)						

If other, please explain. _____

50. How many appointees appointed between January 1 and December 31, 2018 and subject to the Ethics Pledge were registered lobbyists during the two years prior to their appointment? _____

51. 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 to appointees in your agency in 2018, the names of those individuals granted waivers in 2018, and which of the Pledge paragraphs were implicated.

	Number of Ethics Pledge Waivers Granted By Pledge Paragraph	Name(s) of Individual(s) Granted Ethics Pledge Waivers
a. Paragraph 1		
b. Paragraph 2		
c. Paragraph 3		
d. Paragraph 4		
e. Paragraph 5		
f. Paragraph 6		
g. Paragraph 7		
h. Paragraph 8		
i. Paragraph 9		
j. Other (please explain)		

If other, please explain. _____

52. Were there any violations of the Ethics Pledge during 2018?

- Yes
- No (*skip to next Part*)

53. Please provide information on enforcement actions taken as a result of violations of the Pledge. _____

ADDITIONAL COMMENTS FOR PART 11. Please indicate the question number to which the comment corresponds. (*not required*)

PART 12. SPECIAL GOVERNMENT EMPLOYEES (SGEs)

54. How many Special Government Employees (SGEs) did your agency have, in total, during calendar year 2018? _____ *(if zero, skip to Additional Comments for Part 12)*

55. How many SGEs serving on a board, commission, or committee were required to receive Initial Ethics Training (IET) by December 31, 2018 (5 C.F.R. 2638.304(b)(2))? _____

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. _____

56. Report the number of SGE public and confidential financial disclosure reports required to be filed by December 31, 2018 and the number of reports actually filed by December 31, 2018.

Public Reports (OGE Form 278e)	Confidential Reports (OGE Form 450 or OGE- Approved Alternative Form)		Public Reports (OGE Form 278e)	
	Required	Filed	Required	Filed
a. Advisory Committee Members (FACA)				
b. Advisory Committee Members (non-FACA)				
c. Experts/Consultants				
d. Board Members				
e. Commissioners				
f. Other				
TOTAL				

Example for new entrant and termination reports: If an employee started with the agency on December 15, 2018, and filed a new entrant report prior to the end of the calendar year, include the report in your required and filed numbers. If, on January 1, the employee has not filed a new entrant report, do not count that report in your required numbers. Instead, include the employee in your 2019 Questionnaire response numbers in 2020.

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

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

58. Extensions and late filing fees for SGE financial disclosure reports:

	Granted filing extension	Granted waiver of late filing fee	Paid late filing fee
a. Number of OGE Form 278e Reports			
b. Number of OGE Form 450 or OGE-Approved Alternative Forms			

ADDITIONAL COMMENTS FOR PART 12. Please indicate the question number to which the comment corresponds. *(not required)*

ADDITIONAL QUESTIONNAIRE COMMENTS:

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 *(not required)*

Street:
City:
State:
Zipcode:

DAEO *(not required)*

Street:
City:
State:
Zipcode:

Chief Human Capital Officer *(not required)*

Street:
City:
State:
Zipcode:

Inspector General *(not required)*

Street:
City:
State:
Zipcode: