



November 14, 2019
PA-19-13

PROGRAM ADVISORY

TO: Designated Agency Ethics Officials

FROM: David J. Apol
General Counsel

SUBJECT: Reminder of Deadlines and Procedures for Annual Public Financial Disclosure Reports Required to be Transmitted to the U.S. Office of Government Ethics (OGE)

The purpose of this Program Advisory is to remind agencies of annual public financial disclosure deadlines, to explain reasons why OGE may decline to certify a report, and to provide additional information on year-end status letters.

The end of the 2019 public financial disclosure filing season is fast approaching. As outlined in PA-19-06, Friday, December 13, 2019, is the final deadline for agencies to transmit reports to OGE which required additional information for agency certification. OGE may decline to certify any 2019 annual report for which OGE has not received sufficient information to certify the report by Friday, January 10, 2020. The agency is responsible for transmitting the report and any other information OGE may request sufficiently in advance to provide OGE enough time to review and certify the report by that date.

In addition to declining to certify due to a lack of sufficient information for certification, OGE may also decline to certify any 2019 annual report for other reasons, including unresolved conflicts, non-compliance with ethics rules, or continued non-compliance with the ethics agreement.

Accordingly, agency ethics officials may want to now take the opportunity to raise any potential concerns to leadership about any issues or lack of cooperation by any filer.

OGE will provide agency heads with year-end status letters regarding their agency's processing of 2019 annual reports not later than Wednesday, January 15, 2020. Copies of these letters will also be provided to DAEOs. In most cases, these year-end status letters will allow OGE to inform the agency head that the agency has successfully completed the 2019 annual filing cycle. If the agency has not completed the 2019 filing cycle, these letters will advise the agency head of any reasons why, including:

- 1) The agency has not transmitted all required reports to OGE; or



- 2) The agency has not provided OGE sufficient information to certify a report by January 10. [Note: OGE declining to certify a report neither removes a filer's obligation to provide the required information nor absolves the agency of the responsibility for collecting that information.]

The year-end status letters will name filers whose reports are still outstanding, unless OGE determines that identifying the filer is not in the interest of the executive branch ethics program (e.g., due to a pending investigation, a filer's incapacitation, OGE's subsequent receipt of a report needing little additional work, or OGE's receipt of an adequate response prior to issuance of the year-end status letter).

If you have any questions about this program advisory or the 2019 filing cycle, please contact Megan Granahan at 202-482-9204 or mvgranah@oge.gov.