

From: [REDACTED]
Sent: Saturday, June 01, 2013 2:32 PM
To: USOGE
Subject: OGE Form 450 paperwork comment

Recommended changes to the OGE 450 Form, both the current version and my proposed SGE and FTE versions

Dear OGE

What follows is in regards to OGE having published in the *Federal Register* a first round paperwork renewal notice requesting agency and public comment on its intention to submit to the Office of Management and Budget (OMB) for review and three-year renewal of approval under the Paperwork Reduction Act an unmodified OGE Form 450 Executive Branch Confidential Financial Disclosure Report. See 78 FR 29753 dated May 21, 2012. Feel free to post this in the *Federal Register* or elsewhere as necessary.

As a member of the public I provide the following comments and recommendations to improve the current OGE 450 Form.

Create a special version of the OGE 450 just for Special Government Employees (SGEs). It would be called the OGE 450 SGE would delete the last section, Part/Section V of it as it is not applicable to SGEs. Also have the "Reporting Status" selection blocks should read for new entrant (NE)/annual update. This would be a change from the current policy of having SGEs always filing a NE report even though many SGEs on advisory committees often have terms of three to five years and thus currently end up filing NE reports annually. The new SGE form would also specify at the relevant blocks that they are to put their FEDERAL position, not their regular nine to five job which is often with a university, hospital, or business and what blocks are to contain their personal or primary civilian job address/phone. SGEs frequently fill in the latter information instead of their federal SGE position, particularly SGEs on advisory committees.

In doing the above the current OGE 450 itself might need to be renamed to avoid confusion, such as calling it the OGE 450 Career or full time employee (FTE) version to differentiate it from the proposed SGE version.

Both the OGE 450 FTE and OGE 450 SGE forms should be changed ask under **Part I: Assets and Income** if an asset is "1. Over \$12,000? or 2. Over \$15,000?" or the like so reviewers know

if they need to caution to the filer to monitor and contact the ethics office if it goes over \$15,000 if it is between \$12,000 and \$15,000 and if over \$15,000 for the reviewer to do a conflicts of interest analysis. Making this modest change will reduce the amount of time ethics officials spend obtaining this information for OGE 450 filers.

A final idea might be to consider keeping a Part V for the OGE 450 SGE version but make it cover something else. Here is a possible different Part V for the OGE 450 SGE version:

“Possible” New SGE Version Part V

Research Support/Project Funding (grants, contracts, or cooperative agreements), and **Patent Royalties**.

Reporting Research Support/Project Funding: Report the source of any research or project funding available to you, your employing institution, or sponsoring entity, for direct support of your research endeavors through research or training grants, cooperative agreements, or contracts (even if below the \$1,000 asset threshold and the \$200 income threshold indicated elsewhere on the OGE Form 450). Reporting should also be made for funds that are available to a spouse, minor child, or general partner for research endeavors. If you have NO research support/project funding, check the NONE box below.

First column - Funding Organization
(Name, City, State)

Second column - Exact Title of Project. Include the amount of remuneration and the start and completion dates; Indicate whether funded through grant, cooperative agreement, or contract and your role (i.e., principal investigator, co-investigator, researcher, or other). If a federal agency grant, include the grant number. Example: E P A Grant #: "Health Effects of Long Term Exposure to Air Pollutants;" \$450,000; July 2009-July 2012; Principal Investigator.

Patent Royalties: Provide a list of all unexpired patents/patent applications in which you or your spouse have an ownership interest or are listed as an inventor, and in relation to which you or your spouse have a right or are entitled to share in royalties.

To give readers a better idea of what the OGE 450 “SGE” Form might look like I provide the below first page of the actual form with text changes **in red**, the first page of instruction would need to be changed too:

CONFIDENTIAL FINANCIAL DISCLOSURE REPORT **Special Government Employees (SGEs) Version**

An SGE is an executive branch 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 a period not to exceed 130 days during any consecutive 365-day period.

Executive Branch

Employee's Name (<i>Print last, first, middle initial</i>)		E-mail Address	
Your Federal SGE Position/Title			Grade
Federal Agency SGE With		Federal Branch/Unit and Address SGE With	
Home or Regular Work Phone	Reporting Status New Entrant Annual Update	If New Entrant, Date of Appointment to Position (mm/dd/yy)	
Check box if Special Government Employee (SGE)	An SGE is an executive branch 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 a period not to exceed 130 days during any consecutive 365-day period.		
Regular Work or Home Mailing Address (<i>Number, Street, City, State, ZIP Code</i>)			

Step 1: Read the instructions for Parts I through V on the following pages.
Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	Yes	No
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	Yes	No
III. I have reportable outside positions for myself.	Yes	No
IV. I have reportable agreements or arrangements for myself.	Yes	No
NOTE: Statement V is for <u>annual</u> filers only. It does not apply to new entrants and SGEs. V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children. Possible new text: V. I have reportable Research Support/Project Funding (grants, contracts, or cooperative agreements), and Patent Royalties .	Yes	No

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

To give readers a better idea of what the OGE 450 "FTE/Career" Form might IF a separate SGE version is created look like I provide the below first page of the actual form with text changes **in red**, the first page of instruction would need to be changed too:

CONFIDENTIAL FINANCIAL DISCLOSURE REPORT **Full Time Government Employees (FTEs) Version**

An FTE is an executive branch 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 a period **OVER** 130 days during any consecutive 365-day period. Special Government Employees (SGEs) are to use the OGE 450 SGE Form

Executive Branch

Employee's Name (<i>Print last, first, middle initial</i>)		E-mail Address	
Position/Title			Grade
Agency		Branch/Unit and Address	
Phone	Reporting Status New Entrant Annual	If New Entrant, Date of Appointment to Position (mm/dd/yy)	
Check box if Special Government Employee (SGE)	An SGE is an executive branch 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 a period not to exceed 130 days during any consecutive 365-day period.		
Mailing Address (<i>Number, Street, City, State, ZIP Code</i>)			

Step 1: Read the instructions for Parts I through V on the following pages.

Step 2: For each statement below, check Yes or No to describe your situation.

I. I have reportable assets or sources of income for myself, my spouse, or my dependent children.	Yes	No
II. I have reportable liabilities (debts) for myself, my spouse, or my dependent children.	Yes	No
III. I have reportable outside positions for myself.	Yes	No
IV. I have reportable agreements or arrangements for myself.	Yes	No
NOTE: Statement V is for <u>annual</u> filers only. It does not apply to new entrants and SGEs.	Yes	No
V. I have reportable gifts or travel reimbursements for myself, my spouse, or my dependent children.	Yes	No

Step 3: If you selected Yes for any statement, you must describe the reportable interests that you have in the corresponding Part (I, II, III, IV, or V) of the form.

Step 4: Sign and date the form.

Step 5: Submit the completed form to your ethics office.

I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.

END

The idea and views expressed above are those of the author and are not those of the federal government or any federal agency.

[REDACTED]

[REDACTED]

From: Santoro, Karen T. [<mailto:ksantoro@nsf.gov>]
Sent: Friday, July 05, 2013 10:07 AM
To: USOGE
Cc: [REDACTED]
Subject: OGE Form 450 paperwork comment

Respectfully request that OGE consider adding the following language (highlighted below) to enhance the quality, clarity, and utility of the information collected:

Part III: Outside Positions Report for Yourself:

• All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, consultant, editor, advisor, or committee member of any of the following:

- Corporation (including LLC), partnership, trust, or other business entity
- Non-profit or volunteer organization
- Scientific or professional society
 - Educational institution including foreign universities
 - Foreign Government

Thank you
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