



April 22, 2021
PA-21-02

PROGRAM ADVISORY

TO: Designated Agency Ethics Officials

FROM: David J. Apol
General Counsel

SUBJECT: Deadlines and Procedures for Annual Public Financial Disclosure Reports of Executive Branch Employees (2021 Filing Cycle)

This Program Advisory provides filing deadlines for the public financial disclosure reports of executive branch employees and procedures for the reports agencies are required to transmit to the U.S. Office of Government Ethics (OGE).

Deadlines for 2021 Annual Reports

Unless they receive an extension, public filers must file their 2021 annual reports with their agencies on or before **Monday, May 17, 2021**. Agencies must make filed reports available to the public, upon request, within 30 days of receipt.¹ Agencies must review reports within 60 days of filing.² Once an agency reviews and certifies a report, the agency must promptly forward the report to OGE if the report requires OGE review.

The deadlines for 2021 annual reports of public filers are listed below.

Monday, May 17 – deadline for filing the report without an extension

Thursday, June 17 – reports filed on May 17 must be released to the public upon request

Thursday, July 1 – deadline for filing the report with a 45-day extension

Friday, July 16 – deadline for reviewing reports filed on May 17 (such reports not requiring additional information should also be certified and forwarded to OGE by this date)

¹ 5 C.F.R. § 2634.603(c).

² *Id.* § 2634.605(a).



Monday, August 16 – deadline for filing the report with a 90-day extension

Friday, November 12 – final deadline for agencies to transmit reports to OGE

Declined Certification

OGE may decline to certify any 2021 annual report for which OGE has not received sufficient information to certify the report by **Monday, January 10, 2022**. The agency is responsible for transmitting the report and such other information as OGE may request sufficiently in advance to provide OGE enough time to review and certify the report by that date.

OGE may also decline to certify any 2021 annual report for other reasons, including the filer's unresolved potentially conflicting holding or position, non-compliance with applicable ethics rules, or continued non-compliance with the ethics agreement.

Year-End Status Letters

As soon as practicable, but not later than **Tuesday, January 18, 2022**, OGE will provide agency heads with year-end status letters regarding the processing of 2021 annual reports required to be transmitted to OGE.³ OGE will provide copies of these letters to Designated Agency Ethics Officials.

In most cases, these year-end status letters have allowed OGE to inform the agency head that the agency has successfully completed the annual filing cycle. These letters will advise each agency head, as appropriate, of any unresolved issues with any outstanding reports. The year-end status letters will normally name the filers whose reports are at issue, except when OGE determines that identifying the filer is not in the interests of the executive branch ethics program (e.g., due to a pending investigation, a filer's incapacitation, OGE's receipt of an adequate response prior to issuance of the year-end status letter, etc.).

If you have any questions about this Program Advisory or the 2021 filing cycle, please contact Megan Granahan at 202-482-9204 or mvgranah@oge.gov.

³ *Id.* § 2638.108(a)(11).