



United States  
**Office of Government Ethics**  
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DO-08-019

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Joseph E. Gangloff  
Deputy Director

SUBJECT: Review of Financial Disclosure Processes and Procedures

The Office of Government Ethics (OGE) is conducting a review to evaluate agencies' processes and procedures for collecting, reviewing, and certifying financial disclosure reports, including those filed by nominees for Presidentially-appointed, Senate-confirmed (PAS) positions. The review will consist of two parts. The first part will be a questionnaire to be completed electronically. The second part will be an on-site follow-up. Agencies selected to be included in the review will be contacted in the near future.

The review will focus on internal controls; the review is also intended to underscore the importance of ensuring accuracy, consistency, and timeliness in the processing of PAS nominee reports in anticipation of the next Presidential transition.

Financial disclosure serves to prevent conflicts of interest and to identify potential conflicts by providing for a systematic review of financial interests of both current and prospective officers and employees. Financial disclosure is intended to promote public confidence in the integrity of the Federal Government by demonstrating that high-level officials are able to carry out their duties without compromising the public trust.

To begin the review process, OGE will e-mail a questionnaire to agencies included in the review. The questionnaire addresses processes and procedures for handling both public (SF 278) and confidential (OGE Form 450) financial disclosure reports. The questionnaire does not address the financial disclosure reports filed by special Government employees (SGEs). Information gathered through the questionnaire and subsequent on-site follow-up visits will be used to develop model practices and recommendations to enhance the executive branch ethics program.