

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



March 2, 2015  
PA-15-01

PROGRAM ADVISORY

TO: Designated Agency Ethics Officials

FROM: Walter M. Shaub, Jr.  
Director

SUBJECT: Implementation of *Integrity* and New Public Financial Disclosure Report Form

Under the Ethics in Government Act (EIGA), and the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act), the U.S. Office of Government Ethics (OGE) is responsible for establishing and supervising a financial disclosure program for the executive branch. OGE is implementing *Integrity*, the new executive branch-wide electronic filing system for public filers. This Program Advisory provides Designated Agency Ethics Officials (DAEOs) with information regarding *Integrity* and related data-submission requirements.

- I. The Launch of *Integrity*: Background on the development of *Integrity*.
- II. Implementation of *Integrity* in the Executive Branch: Information regarding the rollout of *Integrity*.
- III. OGE Form 278e: Introduction to the new public financial disclosure report form that replaces the OGE Form 278.
- IV. New Reporting Requirement: Instructions to agencies for submitting a new category of information to OGE on a recurring basis effective January 1, 2016.
- V. Requests to Continue Using Legacy Electronic Filing Systems: Description of OGE's process for considering agency requests to continue using electronic filing systems other than *Integrity*.
- VI. Data Call Regarding Tentative Plans of Agency Ethics Officials: Instructions to agencies for submitting certain information to OGE by July 1, 2015.
- VII. Additional Information: How to obtain additional information about *Integrity*.

Appendix 1 - Key Features of *Integrity*

Appendix 2 - Sample OGE Form 278e (with hypothetical filer information)

Appendix 3 - Alternate Excel Version of the OGE Form 278e for Paper Filing (Blank)

Appendix 4 - Specifications for Transmitting Required Data from an Authorized Legacy Electronic Filing System

Appendix 5 - Specifications for Transmitting Required Data from an Agency Collecting Public Financial Disclosure Reports in Paper Format

Appendix 6 - Non-Exhaustive Examples of the Types of Income and Assets that are Reported in Parts 2, 5, and 6 of the OGE Form 278e

Appendix 7 - Timeline

The aim of this Program Advisory is to provide agencies with as much information as possible regarding OGE's plan for public financial disclosure. As discussed at a recent quarterly DAEO meeting, OGE has decided to share this information now, rather than wait until all aspects of the plan are finalized. As such, the plan may change as needed, but OGE will promptly notify DAEOs of any changes.

## **I. The Launch of *Integrity***

On January 1, 2015, OGE launched *Integrity*, the web-based electronic filing system for executive branch public financial disclosure report filers mandated by the STOCK Act. *Integrity* significantly enhances the filing, review, and program management aspects of the executive branch public financial disclosure program. A combination of data-entry tables and context-dependent questions helps filers to identify all of their reportable financial interests and to disclose those interests correctly. *Integrity* also enables agency ethics officials to assign, review, track, and manage reports electronically. Appendix 1 to this Program Advisory lists a number of key features of *Integrity*. OGE has also developed a 14 minute introductory video that demonstrates many of these features. The video can be viewed online at the following address: [https://www.youtube.com/watch?v=FFGK-dDo\\_kE&feature=player\\_embedded](https://www.youtube.com/watch?v=FFGK-dDo_kE&feature=player_embedded).

The origin of *Integrity* dates back to April 4, 2012, when the President signed into law the STOCK Act. The STOCK Act established new requirements for the executive branch ethics program, ethics officials, and the thousands of federal officials who file public financial disclosure reports pursuant to the EIGA. In October 2012, Congress initially approved funding for the development of *Integrity*. OGE immediately started intensive work on a concept for the system and its user interface. Funding became available to OGE in mid-April 2013, at which time OGE commenced the contracting process. Requirements for the system later changed when Congress amended the STOCK Act in April 2013. The General Services Administration awarded

a development contract shortly thereafter, and a kickoff meeting with the contractors on July 11, 2013, marked the beginning of development in earnest.

From the start, OGE's two primary objectives for this project have been to increase the accuracy of public financial disclosure and to reduce the burden on filers. Toward these ends, a cross-divisional team of OGE analysts and attorneys with expertise in financial disclosure developed the content for *Integrity*, and OGE worked closely with a team of user-experience professionals to make the system user friendly. Throughout *Integrity*'s development, OGE collaborated with agency ethics officials, who provided input and tested the system extensively.

## **II. Implementation of *Integrity* in the Executive Branch**

*Integrity* is available to executive branch agencies at no cost. A Rollout Team comprised of OGE staff is working to set up agencies in *Integrity* and register their filers. In the two months since *Integrity*'s launch, 19 agencies have started using *Integrity* and more than two dozen others are actively working with OGE as the rollout expands throughout the executive branch.

OGE is not mandating that agencies use *Integrity* in calendar year 2015. Therefore, each agency may decide whether to require its public filers to use *Integrity* in calendar year 2015. Agencies have sole and exclusive authority to determine the means by which their employees must file their public financial disclosure reports, subject only to the authority of OGE as the supervising ethics office. 5 C.F.R. §§ 2638.101(c), 2638.203(b)(2). Accordingly, an agency that decides to use *Integrity* in calendar year 2015 may direct either all of its public filers or subsets of its public filers to file their reports through *Integrity*. Likewise, an agency may direct its public filers to file either all types of public reports or only certain types of public reports (e.g., new entrant reports, periodic transaction reports, etc.) through *Integrity* in calendar year 2015.

Beginning January 1, 2016, OGE will use *Integrity* to collect public reports of those Senate-confirmed appointees whose reports are submitted to OGE under 5 U.S.C. app. § 103 and the reports of all DAEOs, whose reports are also submitted to OGE. OGE is currently finalizing a processing sequence ("workflow") in *Integrity* for Presidential nominees whose public reports are submitted to OGE and is coordinating with appropriate officials regarding those reports. As of this time, OGE has not made a determination that other public financial disclosure reports must be filed through *Integrity* in calendar year 2016; however, executive branch agencies are strongly encouraged to use *Integrity* for all other public financial disclosure reports, except for reports covered by 5 U.S.C. app. § 105(a)(1) and (2), in calendar year 2016.

## **III. OGE Form 278e**

OGE recently redesigned the public financial disclosure report to support the two fundamental goals of the public financial disclosure system: preventing conflicts of interest and promoting transparency. The new report form, the OGE Form 278e (Executive Branch Personnel Public Financial Disclosure Report), replaces the old report form, the OGE Form 278. OGE has received approval to begin using the OGE Form 278e immediately. Through December 31, 2015,

executive branch public filers may use either the OGE Form 278e or the old OGE Form 278. Beginning January 1, 2016, executive branch public filers will use only the OGE Form 278e.<sup>1</sup>

Two samples of the OGE Form 278e are attached to this Program Advisory. The first sample demonstrates the formatting of the report as rendered by *Integrity*. See Appendix 2. The second sample is an alternate format for use by public filers in circumstances when electronic filing is unavailable. See Appendix 3. OGE has posted an Excel version of this alternate format in the “Forms Library” section of its website, *oge.gov*.

Both the OGE Form 278e and the old OGE Form 278 collect the same information. The information is merely organized differently. The following table cross-references the two forms.

<b>OGE Form 278e Sections</b>	<b>Corresponding OGE Form 278 Sections</b>
Cover Page	Cover Page
Part 1: Filer’s Positions Held Outside United States Government	Schedule D, Part I: Positions held Outside the U.S. Government
Part 2: Filer’s Employment Assets and Income	Schedule A: Assets and Income
Part 3: Filer’s Employment Agreements and Arrangements	Schedule C, Part II: Agreements or Arrangements
Part 4: Filer’s Sources of Compensation Exceeding \$5,000 in a Year	Schedule D, Part II: Compensation in Excess of \$5,000 Paid by One Source
Part 5: Spouse’s Employment Assets and Income	Schedule A: Assets and Income
Part 6: Other Assets and Income	Schedule A: Assets and Income
Part 7: Transactions	Schedule B, Part I: Transactions
Part 8: Liabilities	Schedule C, Part I: Liabilities
Part 9: Gifts and Travel Reimbursements	Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses

OGE reorganized the disclosure of information based on its experience that filers, particularly filers entering government service for the first time, occasionally forget to report financial interests related to employment. It is not uncommon for agency ethics officials to have to instruct filers to add these items to their reports. By segregating financial interests related to

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<sup>1</sup> A DAEO may grant an individual exception for a filer, such as a political appointee, who expects to separate from government service in the near future, provided that the filer’s report is not required to be forwarded to OGE pursuant to 5 U.S.C. app. § 103. Generally, exceptions should be limited to cases where the filer’s report is relatively long or where, in the opinion of the DAEO, circumstances warrant a time-limited exception for the departing political appointee. In addition, OGE may grant limited exceptions through June 2016 for public filers at an agency that is still in the process of converting a legacy electronic filing system to render the OGE Form 278e.

employment, the OGE Form 278e reduces the risk of inadvertent omission. This structure also promotes transparency by highlighting information of significant interest to the public.

Information regarding employment-related interests and retirement plans is collected in Part 2 (Filer’s Employment Assets and Income) and Part 5 (Spouse’s Employment Assets and Income). In these sections, filers will report the following three categories of financial interests:

- (1) Earned income,
- (2) Assets obtained from an employer or through employment, and
- (3) Retirement plans.<sup>2</sup>

The non-exhaustive lists in Appendix 6 provide examples of the types of interests reported in Parts 2, 5, and 6.

Agencies are not expected to be rigid in distinguishing “Employment Assets and Income” from “Other Assets and Income.” OGE has established this distinction with the goals of increasing accuracy and highlighting relevant assets for the interested public. While these goals are important, rigid enforcement is not required in every case. Thus, if an individual filer inadvertently reports an employment-related asset, such as an incentive stock option, in Part 6 (“Other Assets and Income”), the agency has discretion to either accept the entry or instruct the filer to move the asset to Part 2 or Part 5. Alternatively, reviewing ethics officials using *Integrity* can elect to move the asset to the appropriate section of the report, as *Integrity* allows reviewers to make changes for filers.

In addition to the reorganization of disclosures, the OGE Form 278e eliminates the antiquated grid format, which was developed long before modern computer technology was widely available. For example, where a filer would previously have entered an “X” in a column to signify that the value of an asset is in the range of \$50,001 to \$100,000, the new OGE Form 278e will produce the following text: “\$50,001-\$100,000.” As a result, the OGE Form 278e promotes transparency by being easier to read than the old OGE Form 278.

#### **IV. New Reporting Requirement**

Under 5 U.S.C. app. §§ 402(b)(3), (5), and (10), 403(a)(2), and 5 C.F.R. §§ 2638.102(a), 2638.601, OGE collects information and records from executive branch agencies in its capacity as the supervising ethics office for the executive branch. Under 5 U.S.C. § 403(a)(2), executive branch agencies are required to provide the requested information and records. Examples of OGE’s past use of this authority include the regularly scheduled reports OGE collects from all agencies and the documentation OGE collects in connection with its reviews of individual agency ethics programs. As OGE has explained at quarterly DAEO meetings over the past 18 months, the launch of *Integrity* provides OGE with a new opportunity to collect –in standardized format– pertinent information on agency ethics offices, which will enhance OGE’s oversight of the executive branch ethics program.

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<sup>2</sup> Although not always related to employment, OGE intends for individual retirement accounts (IRAs) and similar retirement vehicles to be reported in Parts 2 and 5.

Beginning in May 2016, OGE will collect status updates regarding each agency's financial disclosure program on a recurring basis. Specifically, OGE will collect the following aggregate data from each agency regarding its annual public financial disclosure reports, which are normally filed by May 15 each year:

- (1) The number of filers required to file annual public financial disclosure reports with the agency during the current filing cycle;
- (2) The number of annual public financial disclosure reports of filers identified in (1) that the agency has received as of the date of inquiry;
- (3) The number of annual public financial disclosure reports of filers identified in (2) for which the agency has completed its review, either by certifying the report or by denying certification and closing the report, as of the date of inquiry.

This data will enhance OGE's oversight of the executive branch ethics program by allowing OGE to monitor each agency's progress in administering its individual financial disclosure program. When consolidated with data from other agencies, this data will enable OGE to evaluate the strength of the overall executive branch-wide ethics program. It will also facilitate data-driven decisions in selecting agencies for program reviews.

How OGE obtains this information will depend on the means by which an agency collects annual public financial disclosure reports. If an agency uses *Integrity* to collect annual reports, OGE will obtain the required information automatically through *Integrity*, and the agency will not need to take any action. Note that, although OGE is collecting this aggregate data, OGE is not able to view the financial disclosure reports filed by individual agency employees through *Integrity*, except for those that are required to be filed with OGE under 5 U.S.C. app. § 103.

If an agency has been granted authority to continue using a legacy electronic filing system, the agency must automate transmission of the required information consistent with the specifications provided in Appendix 4. Ensuring the success of this automated transmission to OGE will be the responsibility of the agency.

If an agency does not use an electronic filing system, the DAEO will be responsible for ensuring that OGE receives the required information, consistent with the specifications in Appendix 5. OGE strongly recommends, however, that agencies discontinue the collection of public reports in paper format and instead adopt *Integrity*.

## **V. Requests to Continue Using Legacy Electronic Filing Systems**

In OGE DAEOgram DO-07-014 (2007), OGE for the first time permitted all executive branch agencies to develop their own electronic filing systems for public or confidential financial disclosure reports. Since that time, the STOCK Act and the launch of *Integrity* have changed the landscape of public financial disclosure. Therefore, OGE is rescinding its prior authorization and will no longer allow agencies to adopt electronic filing systems other than *Integrity* to collect

public financial disclosure reports, except as discussed in this Program Advisory. By precluding the implementation of new systems, OGE seeks to reduce fragmentation, eliminate the duplication of cost and effort, and increase the uniformity of public financial disclosure in the executive branch.

This rescission of authority to develop or use electronic filing systems other than *Integrity* is limited in scope. First, it applies only to public financial disclosure reports and does not apply to confidential financial disclosure reports. Second, it does not apply to agencies listed in 5 U.S.C. app. § 105(a)(1). Third, it does not apply to any agency that receives provisional authorization from OGE in 2015 to continue using a legacy electronic filing system.

An executive branch agency that, as of the date of this issuance, is actively using an electronic filing system other than *Integrity* for public financial disclosure reports may request provisional authorization to continue using that system.<sup>3</sup> OGE must receive the request by July 1, 2015. OGE will consider each request on a case-by-case basis. Because OGE's analysis is necessarily individualized and dependent on its assessment of the capabilities of the agency's ethics program, OGE will not consider requests submitted by groups of agencies or by third parties. Instead, the request must come from the agency, and OGE's approval will apply only to the requesting agency. Because OGE needs assurance that the agency's ethics and information technology staffs are coordinating with each other, the request must be signed by both the DAEO and the Chief Information Officer for the agency.

Upon receiving a request, OGE will consider the performance of the agency's ethics program. In addition, OGE will consider whether the request:

- (1) Is signed by both the agency's DAEO and the agency's Chief Information Officer;
- (2) Includes a satisfactory commitment that the agency will modify its legacy electronic filing system to generate the new OGE Form 278e, consistent with the version that *Integrity* produces, as illustrated by the sample at Appendix 2 (not the alternate paper version at Appendix 3);
- (3) Satisfactorily describes how the agency will ensure that filers are able to distinguish the employment-related assets and income of the filer, the employment-related assets and income of the filer's spouse, and other assets and income from one another (e.g., by using the instructions provided in the alternate paper format 278e at Appendix 3, by creating context-dependent questions as part of a "wizard," by including examples, etc.);
- (4) Includes a satisfactory commitment that the agency will accomplish the automated daily transmission of aggregate data as described in Appendix 4;

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<sup>3</sup> Because the rescission of authority for electronic systems does not apply to agencies listed in 5 U.S.C. app. § 105(a)(1), those agencies do not need to request authority. By January 1, 2016, however, those agencies need to modify any electronic filing systems to produce the new OGE Form 278e, unless OGE grants an extension.

- (5) Identifies an agency official at an appropriate level to serve as a point of contact for both the agency's request and any issues that arise in the future regarding the continued use of the legacy system;
- (6) Includes a satisfactory commitment that the agency will use *Integrity* to collect reports that are required to be submitted to OGE under 5 U.S.C. app. § 103;
- (7) Includes a satisfactory commitment that the agency will periodically meet with OGE, when requested, to assess the efficiency and effectiveness of the legacy system; and
- (8) Indicates whether the agency is likely to succeed in converting the legacy system to render the OGE Form 278e by the January 1, 2016, deadline or whether the agency will likely need to request one or two 90-day extensions.

Note that OGE will continue its practice of collecting information from agencies regarding their expenditures on electronic filing systems, as OGE has done in recent years in its Annual Agency Ethics Program Questionnaire.

## **VI. Data Call Regarding Tentative Plans of Agency Ethics Officials**

Pursuant to 5 U.S.C. app. §§ 402(b)(3), (5), and (10), 403(a)(2), and 5 C.F.R. §§ 2638.102(a), 2638.601, OGE is collecting information from executive branch agencies regarding their tentative plans for the collection of financial disclosure reports in calendar year 2016. By July 1, 2015, each agency must submit to OGE a written notice signed by the DAEO that describes these tentative plans.<sup>4</sup> In preparing the notice, DAEOs are encouraged to consult with their Chief Information Officers. The notice should include the following:

- (1) A description of the steps the agency will take to ensure that by January 1, 2016, reports required to be submitted to OGE under 5 U.S.C. app. § 103 are collected through *Integrity*;
- (2) Contact information for a point of contact regarding the steps described in response to item (1), above; and
- (3) An indication as to whether, and to what extent, the agency plans to use *Integrity* to collect other financial disclosure reports in calendar year 2016.

## **VII. Additional Information**

For more information about *Integrity*, OGE encourages agency ethics officials to view the "About *Integrity*" page on MAX.gov.<sup>5</sup> Currently, the page contains a detailed user guide, a variety of quick-help guides, and brief introductory videos targeted to filers, reviewers, and administrators. OGE is continuing to develop additional material for this page. OGE will work

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<sup>4</sup> Because OGE will work with them individually, agencies identified in 5 U.S.C. app. § 105(a)(1) and components of the Executive Office of the President are exempted from this data call.

<sup>5</sup> All MAX.gov users can access this page at <https://community.max.gov/display/OGEEExternal/About+Integrity>.

closely with agency ethics officials to implement *Integrity*, including OGE-conducted group presentations for reviewers and individualized training for personnel designated as *Integrity* administrators for their agencies.

Agency ethics officials with questions regarding *Integrity* may contact George Hancock at [integrity@oge.gov](mailto:integrity@oge.gov). Agency officials with questions regarding specifications for transmitting data to OGE from legacy electronic filing systems as discussed in Appendix 4 may contact Michael Hanson and Timothy Mallon at [integrity@oge.gov](mailto:integrity@oge.gov). Agency ethics officials with questions regarding other aspects of this Program Advisory or the new OGE Form 278e may contact their OGE Desk Officers through normal channels.

Attachments (7)

## KEY FEATURES OF INTEGRITY

*integrity.gov*

*Integrity* is a secure, web-based system for collecting and reviewing public financial disclosure reports in the executive branch. A combination of data-entry tables and context-dependent questions (“wizards”) helps filers to identify all of their reportable financial interests and to disclose those interests correctly. *Integrity* also enables agency ethics officials to assign, review, track, and manage reports electronically. Additionally, OGE has developed a 14 minute informational video that highlights some of *Integrity*’s key features. This video can be viewed online at [https://www.youtube.com/watch?v=FFGK-dDo\\_kE&feature=player\\_embedded](https://www.youtube.com/watch?v=FFGK-dDo_kE&feature=player_embedded).

*Key features for filers include:*

- **Pre-Population Tool:** *Integrity* allows a filer to “pre-populate” a financial disclosure report with data from a prior new entrant or annual report. *Integrity* can also import data from any number of previously filed periodic transaction reports (OGE Form 278-T), and the system specifically allows the filer to choose which periodic transaction reports to include or exclude.
- **Same-Page Data Entry:** Some executive branch electronic filing systems refer the filer to a separate screen each time a new item is entered, causing the filer to lose significant amounts of time transitioning back and forth between screens. *Integrity* solves this problem and saves filers time by collecting information about new items and displaying that information on the same page.
- **Filer Wizards:** *Integrity* improves accuracy by using wizards to prompt filers to provide information they might otherwise forget to report in an initial submission. Consistent with OGE’s goal of reducing the burden on the filer, however, OGE limited this targeted assistance to areas where filers make the most mistakes. In OGE’s experience, these areas involve financial interests related to the outside employment and retirement plans of the filer and the filer’s spouse. *Integrity*’s wizards are highly sophisticated and pose only those questions that are relevant to an individual filer.
- **Auto-Complete:** OGE has programmed the names of over 13,000 financial interests into *Integrity* and plans to add additional names in the future. The asset name auto-complete feature suggests possible matches for entries as a filer is typing. Another auto-complete feature will help filers with more complex holdings. For filers with private investment funds that do not qualify as excepted investment funds, *Integrity* allows the filer to report the underlying holdings of the funds and associate them with the “parent” asset. The auto-complete feature will suggest a list of possible parent

assets by drawing from the names of assets that the filer has already entered. The filer can use the same feature to disclose the underlying holdings of trusts.

- **Plain-Text Dollar Ranges:** *Integrity* eliminates the old fashioned data grids and boxes of the paper OGE Form 278. Instead of displaying an “X” in a column to represent a value or income range, *Integrity* renders the dollar range (e.g., “\$50,001-\$100,000”) neatly in the same row as the name of a financial interest.
- **Flexible Text Fields:** The space provided for the names of financial interests can expand to accommodate lengthy entries, which ensures that the printed report is clean and easy to read.
- **Comments and Endnotes:** Filers may use this feature to submit comments and questions to reviewers or add detailed public endnotes that are incorporated into the financial disclosure report to provide explanatory information about their assets.
- **Security:** *Integrity’s* security features include: 256-bit encryption, limited system access, role-based permissions, independent validation of security controls, and continuous security monitoring. *Integrity* authenticates users by leveraging the auto-authentication services of MAX.gov, an existing federal platform with over 100,000 users. *Integrity* is a web-based application housed at the U.S. Department of Agriculture’s National Information Technology Center (NITC). Both NITC and MAX are FedRAMP authorized (<http://cloud.cio.gov/fedramp>). *Integrity’s* interim Authority to Operate (ATO) is based on NIST 800-53 standards for the application, and the FedRAMP authorizations for the hosting facility and MAX authentication.
- **Easy Login:** To log into *Integrity*, users enter their existing MAX identity and password. At some agencies, filers can simply swipe their PIV or CAC cards. Other agencies have entered into federated login arrangements with MAX.gov, which means that filers are automatically logged into *Integrity* by virtue of having logged into their agencies’ networks.

*Key features for reviewers include:*

- **Comparison of Reports:** Normally, a filer will “pre-populate” the report with information from a previous report before adding, deleting, or revising entries. In that case, an agency ethics official assigned to review the report can use *Integrity’s* comparison tool to examine only items that have changed since the previous report. This tool significantly reduces the workload of agency ethics officials and makes their reviews more effective by highlighting items that have not previously been reviewed for conflicts of interest.
- **Editing Filers’ Entries:** *Integrity* allows an agency ethics official to edit a filer’s report, speeding up the review process where a filer has made obvious mistakes (e.g., failing to identify a readily identifiable mutual fund as an excepted investment fund, misspelling an asset name, etc.). *Integrity’s* audit trail carefully tracks all changes to a

filed report, noting the identity of the user who made each change and the timing of the change.

- **Public Annotations:** A reviewer may use this feature to add notes on the face of the publicly releasable version of the OGE Form 278e or the OGE Form 278-T. These notes are printed in a “Comments of Reviewing Officials” section at the beginning of the report.
- **Comments:** A reviewer may use this feature to instruct a filer to make corrections or supply additional information. By making a comment in-line, the reviewer can draw the filer’s attention directly to the item that needs correction or additional information.
- **Workflows:** *Integrity* contains a variety of workflow options in order to tailor the review process to the needs of individual agencies. The workflows govern the processing sequence as a report progresses from initial assignment to final certification.
- **Notices and Reminders:** *Integrity* can help ethics officials manage their agency’s financial disclosure program by sending a variety of notices and reminders to both filers and reviewers.

**SAMPLE OGE FORM 278e (WITH HYPOTHETICAL FILER INFORMATION)**

# Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

## Filer's Information

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Doe, John Q.

Deputy Assistant Secretary, Department of Technology

Date of Appointment: 02/22/2015

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Other Federal Government Positions Held During the Preceding 12 Months:

Senior Technology Specialist (8/2007 - 2/2015)

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Doe, John Q [electronically signed on 2/27/15 by Doe, John Q in Integrity.gov]

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Smith, Jane Q, Certifying Official [electronically signed on 2/27/15 by Smith, Jane Q in Integrity.gov]

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Other review conducted by

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U.S. Office of Government Ethics Certification

## 1. Filer's Positions Held Outside United States Government

#	NAME	CITY, STATE	ORG TYPE	POSITION	FROM	TO
1	The Alexandria Hypothermia Overflow Shelter	Alexandria, Virginia	Non-Profit	Director (uncompensated)	1/1999	Present

## 2. Filer's Employment Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	(401k) Wolftrap Special Performance Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
2	(401k) Meadowlark Diversified Gardens Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
3	(401k) Burke Lake Midcap Opportunities Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
4	(401k) Oronoco Park Real Estate Investment Trust (REIT)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
5	Mabry Information Technologies Corp., cash balance pension plan	N/A	\$50,001 - \$100,000		None (or less than \$201)

## 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR OTHER PARTY TO AGREEMENT/ARRANGEMENT	CITY, STATE	STATUS AND TERMS	DATE
1	Bortot, Jones & Mabry Technology Partners, LLP	Falls Church, Virginia	I will continue to participate in this defined contribution plan, but the plan sponsor no longer makes contributions.	4/1996
2	Mabry Information Technologies Corp.	Washington, District of Columbia	I will continue to participate in this cash balance pension plan, but the plan sponsor no longer makes contributions.	3/1990

## 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

None

## 5. Spouse's Employment Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Nonluecha Enterprises, Inc. (servo drive manufacturer)	N/A		salary, bonus	
2	Digital Digits, Inc.	N/A		director fees	
3	Nonluecha Enterprises, Inc., defined benefit plan (value not readily ascertainable)	N/A			None (or less than \$201)

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	X-Corp Information Technologies, Inc.	N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
2	Virginia 529 Plan (Piedmont Portfolio)	Yes	\$15,001 - \$50,000		\$201 - \$1,000
3	Montgomery Pendleton Natural Resources Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
4	Royal Fairfax Emerging Opportunities Growth Fund	Yes	\$50,001 - \$100,000		\$201 - \$1,000
5	Henry Patrick Small Cap Fund	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	Cameron Private Equity Strategies IV, LP	No	\$50,001 - \$100,000	Dividends	\$5,001 - \$15,000
6.1	Wolfe Widgets, LLC (widget manufacturer, Albany, NY)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
6.2	Prince Union Aquatics Corp. (aquarium supply retailer, Baltimore, MD)	N/A	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

#	CREDITOR NAME	TYPE OF LIABILITY	AMOUNT	YEAR INCURRED	INTEREST RATE	TERM
1	North Pitt Bank; Durham, NC	Student Loan	\$10,001 - \$15,000	1989	5.2%	30 years
2	Alfred Street Mortgage Co.; Alexandria, VA	Mortgage on Personal Residence	\$250,001 - \$500,000	2012	3.9%	20 years

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## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

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### Endnotes

PART	#	ENDNOTE
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# Summary of Contents

## 1. Filer's Positions Held Outside the United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

## 2. Filer's Employment Assets and Income

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

## 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

## 5. Spouse's Employment Assets and Income

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

## 6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregate the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## 8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## 9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

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**ALTERNATE EXCEL VERSION OF THE  
OGE FORM 278e FOR PAPER FILING (BLANK)**

**Should I Use This Form?**

Candidate: Yes, you should file your report using this form.

Other Category of Filer: In most cases, individuals will file their public financial disclosure reports through an electronic financial disclosure system. Do not use this form if you plan to file using an electronic financial disclosure system.

**When Must I File?**

Candidate: Within 30 days of becoming a candidate for nomination or election to the office of President or Vice President, or by May 15 of that calendar year, whichever is later, but at least 30 days before the election, and on or before May 15 of each succeeding year you continue to be a candidate

Nominee: No later than 5 days after nomination by the President

New Entrant: Within 30 days of assuming a covered position

Annual: No later than May 15 annually

Termination: Within 30 days of leaving a covered position

**Extensions**

The employing agency may grant you an extension of up to 45 days for good cause shown with the possibility of one additional extension of up to 45 days. Extensions for Candidates are granted by the Federal Election Commission.

**Late Filing**

You will be subject to a \$200 late filing fee if you file your report more than 30 days after the due date (including any extensions). A report is considered to be filed when it is received by the agency. Agencies may waive this fee if the delay was caused by extraordinary circumstances. Unless waived, the agency will collect the fee for deposit with the United States Treasury.

**Warnings**

Knowing and willful falsification of information, or failure to file or report information required to be reported by section 102 of the Ethics in Government Act of 1978, as amended (the Act), may subject you to a civil monetary penalty and to disciplinary action by your employing agency or other appropriate authority under section 104 of the Act. Knowing and willful falsification of information required to be filed by section 102 of the Act may also subject you to criminal prosecution.

**Applicability:** All filers complete Part 1.

**Reporting Period:**

Candidate, Nominee or New Entrant: Preceding two calendar years and current year to filing date

Annual: Preceding calendar year and current year to filing date

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

Report any positions that you held at any time during the reporting period (excluding positions with the United States Government). Reportable positions include those of an officer, director, trustee, general partner, proprietor, representative, employee, or consultant of any for-profit or non-profit organization (whether compensated or uncompensated).

**Exceptions:**

Do not report the following: (1) positions held as part of your official duties with the United States Government; (2) positions with religious, social, fraternal, or political entities; (3) positions solely of an honorary nature; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

In addition, you do not need to report service as a member of an advisory board or committee if the following criteria are met:  
(1) the advisory board or committee is that of a non-profit organization;  
(2) your service is unpaid; and (3) you have no fiduciary duties of the sort exercised by officers, directors, or trustees.

**Completing the Fields:**

Organization Name: Provide the name of the organization.

City/State: Provide the city and state in which the organization is located.

Organization Type: Describe the type of organization.

Position Held: Provide the title or a brief functional description of the position you hold or held.

From: Provide the month and year in which you began in the position.

To: Provide the month and year in which the position ended. If you still hold the position, write "present."

**Nothing to Report:** If you do not have anything to report, write "None."

**Applicability:** All filers complete Part 2.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

- Report each source of your earned and other non-investment income over \$200 during the reporting period (e.g., salary, fees, partnership share and other business income, honoraria, scholarships, and prizes).
- Report each asset related to your business, employment, or other income-generating activities if the value of the asset at the end of the reporting period exceeded \$1,000 or if the asset produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, anticipated payments such as severance payments, deferred compensation, and intellectual property such as book deals and patents).

**Exceptions:**

Do not include assets or income from United States Government employment. In addition, do not assets that were acquired separately from your business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in Part 6.

**Completing the Fields:**

Description: Provide a description sufficient to identify the asset or source being reported.

EIF: If you are reporting an investment vehicle that invests in assets of its own, you need to report each underlying asset that was individually worth more than \$1,000 at the end of the reporting period or that individually produced more than \$200 in income during the reporting period. As an exception to this requirement, however, you do not need to report the underlying assets of an investment vehicle that qualifies as an excepted investment fund (EIF). Indicate whether your entry qualifies an excepted investment fund. If your entry is not an investment vehicle at all, select "N/A."

Definition of "Excepted Investment Fund": An excepted investment fund is an investment fund that is (1) widely held; (2) either "publicly traded or available" or "widely diversified"; and (3) independently managed, meaning you neither exercise control nor have the ability to exercise control over the financial interests held by the fund. A fund is widely diversified if it holds no more than 5% of the value of its portfolio in the securities of any one issuer (other than the United States Government) and no more than 20% in any particular economic or geographic sector.

Value: Report the value of an asset by selecting the appropriate category.

*(Instructions continue on the following page.)*

Income Type:

**Nothing to Report:** If you do not have anything to report, write "None."

- (1) Income Less than \$201: Leave this field blank.
- (2) Asset Qualifies as an EIF: Leave this field blank.
- (3) Dividends, Interest, Capital Gains, or Rent or Royalties: Enter these types of income into the field.
- (4) Other Income: Provide an appropriate description (e.g., "salary").

Income Amount:

- (1) Income Less than \$201: Select "None (or less than \$201)."
- (2) Asset Qualifies as an EIF: Select the category that corresponds to the total amount of income produced during the reporting period.
- (3) Dividends, Interest, Capital Gains or Rent or Royalties: Select the category that corresponds to the total amount of income produced during the reporting period.
- (4) Other Cases: Provide the exact amount of income produced during the reporting period in the space provided.

**Instructions for Completing Part 3 of the OGE Form 278e: Filer's Employment Agreements and Arrangements**

**Applicability:** All filers must complete Part 3.

**Reporting Period:**

Candidate, Nominee, or New Entrant: As of the date of filing

Annual: Preceding calendar year and current year to filing date

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

Report any agreements or arrangements that you had during the reporting period for the following: (1) continuing participation in an employee welfare or benefit plan maintained by a former employer; (2) leave of absence; (3) future employment; or (4) continuation of payments by a former employer (e.g., severance payments).

**Exceptions:**

Do not report the following: (1) agreements and arrangements with the United States Government, such as your participation in the Federal Employees Retirement System or the Civil Service Retirement System; (2) agreements and arrangements of your spouse or your dependent children; (3) if you are a Presidential nominee, any agreement or arrangement that will end before you file your Nominee report; and (4) if you are filing a New Entrant report, any agreement or arrangement that ended prior to the beginning of your appointment to your current position.

**Completing the Fields:**

Employer or Party: Provide the parties to the agreement or arrangement, other than yourself. In most cases, the other party will be your employer.

City/State: Provide the city and state of the other parties.

Status and Terms: Briefly describe the type of agreement or arrangement, its terms (in particular, the timing and form of any payments), and its current status.

Date: Provide the month and year in which the agreement or arrangement began. In many cases, this will be when you joined the employer or otherwise became eligible for coverage under the agreement or arrangement.

**Nothing to Report:** If you do not have anything to report, write "None."

**Instructions for Completing Part 4 of the OGE Form 278e: Filer's Sources of Compensation Exceeding \$5,000 in a Year**

**Applicability:** Complete Part 4 if you are filing a Nominee or New Entrant report. Otherwise, leave this Part blank.

**Reporting Period:**

Nominee or New Entrant: Preceding two calendar years and current year to filing date

Other Reports: N/A

**Reporting Requirement:**

Report any source (except the United States Government) that paid more than \$5,000 for your services during any year of the reporting period. Report employers and any clients to whom you personally provided services. You must report a source even if the source made its payment to your employer and not to you. Do not report a client who paid your employer if you did not provide the services for which the client made the payment.

**Exception:**

In certain rare cases, you need not provide the identity of confidential clients. In those cases, indicate the number of confidential clients that have not been disclosed (e.g., "2 confidential clients not disclosed").

**Completing the Fields:**

Source Name: Provide the name of the source.

City/State: Provide the city and state in which this source is located.

Brief Description of Duties: Provide a brief description of your duties or the type of services rendered.

\* *Confidential Clients:* You do not need to report the identity of a client if the client's identity is protected by a court order or is under seal. In limited circumstances, the exception may also apply if the client is considered confidential because:

1. the client is the subject of a pending grand jury proceeding or other non-public investigation in which there are no public filings, statements, appearances, or reports that identify him or her;
2. disclosure is prohibited by a rule of professional conduct that can be enforced by a professional licensing body; or
3. a privileged relationship was established by a written confidentiality agreement, entered into at the time that your services were retained, that expressly prohibits disclosure of the client's identity.

A client will not be deemed confidential merely based on the filer's belief that the client would prefer not to be disclosed or based on the fame or social standing of the client.

**Nothing to Report:** If you do not have anything to report and you are filing a Nominee or New Entrant report, write "None."

**Applicability:** All filers complete Part 5.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

- Report each source of earned income, excluding honoraria, for your spouse over \$1,000 during the reporting period.
- Report each source of honoraria for your spouse over \$200 during the reporting period.
- Report each asset related to your spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents).

**Exceptions:**

Do not include assets or income from United States Government employment. In addition, do not include assets that were acquired separately from your spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in Part 6.

**Completing the Fields:**

Complete these fields using the instructions from Part 2 with two exceptions. First, you do not need to provide the exact amount of your spouse's earned income, other than honoraria. Instead, simply describe the type of income in the Income Type field and leave the Income Amount field blank. Second, the value and income amount fields include a category labeled "Over \$1,000,000." You may use this category or you may use the higher value and amount categories.

**Nothing to Report:** If you do not have anything to report, write "None."

**[Instructions for Completing Part 6 of the OGE Form 278e: Other Assets and Income](#)**

**Applicability:** All filers complete Part 6.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

Each asset held for investment or the production of income, not already reported in Part 2 or Part 5, that ended the reporting period with a value greater than \$1,000 or that produced more than \$200 in income during the reporting period. For purposes of the value and income thresholds, aggregate your interests with those of your spouse and your dependent children.

**Exceptions:**

Do not report any of the following: (1) a personal residence that you did not rent out during the reporting period; (2) retirement benefits from the United States Government, including the Thrift Savings Plan; (3) income from social security, veterans' benefits, and other similar United States Government benefits; (4) deposits in a single financial institution aggregating \$5,000 or less in money market accounts, certificates of deposit, savings accounts, checking accounts or other cash deposits; (5) shares in a single money market mutual fund aggregating \$5,000 or less; (6) loans made by you or your spouse to each other or to a parent, sibling, child, or grandchild; (7) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (8) interests of a former spouse or a spouse from whom you are permanently separated; and (9) payments from a spouse or former spouse associated with a divorce or permanent separation.

**Completing the Fields:**

Complete these fields using the instructions from Part 2 with one exception. The value and income amount fields include a category labeled "Over \$1,000,000."

You may use this category only for your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

**Nothing to Report:** If you do not have anything to report, write "None."

**[Instructions for Completing Part 7 of the OGE Form 278e: Transactions](#)**

**Applicability:** Complete Part 7 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

**Reporting Period:**

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

Report any purchase, sale, or exchange of real property or securities in excess of \$1,000 that was made by you, your spouse, or your dependent child during the reporting period.

**Exceptions:**

Do not report the following: (1) a personal residence, unless the personal residence was rented out at any point during the reporting period; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, notes, and bonds; (4) Thrift Saving Plan accounts; (5) an underlying asset of an excepted investment fund, an excepted trust, or a qualified trust; (6) transactions that you already reported in your periodic transaction report (OGE Form 278-T), unless your agency requires duplicate reporting; (7) transactions that occurred when you were not an employee of the United States Government; (8) transactions that occurred solely by and between you, your spouse, and your dependent children; (9) interests of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; and (10) interests of a former spouse or a spouse from whom you are permanently separated.

**Completing the Fields:**

Description: Provide the name of the asset.

Type: Specify the type of transaction as a purchase, sale, or exchange

Date: Provide the month, day, and year of the transaction.

Amount: Report the amount of transaction by selecting the appropriate category. You may use the "Over \$1,000,000" category only for transactions involving your spouse's or dependent child's assets. Do not use this category for your assets or assets held jointly with your spouse or dependent child.

**Nothing to Report:** If you do not have anything to report, write "None."

**Applicability:** All filers complete Part 8.

**Reporting Period:**

Candidate, Nominee, or New Entrant: Preceding calendar year and current year to filing date

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

**Reporting Requirement:**

Report liabilities over \$10,000 that you, your spouse, or your dependent child owed at any time during the reporting period.

**Reporting Exceptions:**

Do not report the following: (1) loans secured by a personal motor vehicle, household furniture, or appliances, provided that the loan does not exceed the item's purchase price; (2) revolving charge accounts, such as credit card balances, where the outstanding liability did not exceed \$10,000 at the end of the reporting period; (3) personal liabilities owed to a spouse, parent, sibling, or child of yours, your spouse, or your dependent child; (4) liabilities of a spouse living separate and apart with the intention of terminating the marriage or providing for a permanent separation; (5) liabilities of a former spouse or a spouse from whom you are permanently separated; and (6) obligations arising from divorce or permanent separation.

*(Instructions continue on the following page.)*

**Additional Exception for Certain Mortgages:**

- If you are not a nominee or appointee to a Presidentially-appointed, Senate-confirmed (PAS) position, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences.
- If you are a nominee or appointee to one of the three types of PAS positions listed below, you do not need to report a mortgage or home equity loan secured by your personal residence, unless you rented out the personal residence during the reporting period. However, you must report mortgages or home equity loans on properties that do not qualify as personal residences. The three types of PAS positions are:
  - (1) a position in which you will serve as a special Government employee (SGE); (2) a position as a Foreign Service Officer below the rank of ambassador; or (3) a position in the uniformed services for which the pay grade prescribed by section 201 of title 37, United States Code is O-6 or below.
- If you are a nominee or appointee to any other type of PAS position, you must report a mortgage or home equity loan secured by your personal residence as you would a mortgage on any other property.

**Completing the Fields:**

**Nothing to Report:** If you do not have anything to report, write "None."

Creditor Name: Provide the name of the creditor/lending institution.

Type: Identify the type of liability.

Amount: Select the appropriate category of amount or value. For revolving charge accounts, use the value of the liability at the end of the reporting period. For all other liabilities, select the category that corresponds to the highest amount owed during the reporting period. You may use the "Over \$1,000,000" category only for your spouse's or dependent child's liabilities. Do not use this category for your liabilities or a joint liability for you and your spouse or dependent child.

Year Incurred: Provide the year that the liability was incurred.

Rate: Provide the interest rate. Describing the rate in reference to a prime rate, such as "prime + 1," is also sufficient.

Term: Specify, in years or months, the time that the loan allows for repayment. If applicable, you may write "on demand" or "revolving."

## [Instructions for Completing Part 9 of the OGE Form 278e: Gifts and Travel Reimbursements](#)

**Applicability:** Complete Part 9 if you are filing an Annual or Termination report. Otherwise, leave this Part blank.

### **Reporting Period:**

Candidate, Nominee, or New Entrant: N/A

Annual: Preceding calendar year

Termination: End of period covered by last report to termination date

### **Reporting Requirement:**

- Gifts totaling more than \$375 that you, your spouse, and your dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that you, your spouse, and your dependent children received from any one source during the reporting period.

If more than one gift or travel reimbursement was received from a single source: (1) Determine the value of each item received from that source; (2) exclude each item valued at \$150 or less; and (3) add the value of those items valued at more than \$150. If the total is more than \$375, then you must report each item valued at more than \$150.

### **Exceptions:**

Do not report the following: (1) anything received from a relative; (2) bequests and other forms of inheritance; (3) suitable mementos of a function honoring you (e.g., retirement party); (4) food, lodging, transportation, and entertainment or reimbursements provided by a foreign government within a foreign country or by the United States Government, the District of Columbia, or a State or local government; (5) food and beverages not consumed in connection with a gift of overnight lodging; (6) anything given to your spouse or dependent child

totally independent of their relationship to you; (7) gifts in the nature of communications to your office, such as subscriptions to newspapers and periodicals; (8) gifts of hospitality (food, lodging, entertainment) on the donor's personal or family premises, as defined in 5 C.F.R. Part 2634; (9) any gifts and travel reimbursements received when you were not an employee of the United States Government; and (10) any reimbursements you received for political trips that were required to be reported under section 304 of the Federal Election Campaign Act of 1971 (2 U.S.C. § 434).

### **Completing the Fields:**

Source Name: Provide the identity of the source.

City/State: Provide the source's city and state of business or residence.

Brief Description: Describe the nature of the item or reimbursement received. For travel-related gifts and reimbursements, include a travel itinerary, the dates of travel, and the nature of the expenses. Although not required, it is helpful to specify your relationship to the source or note the basis on which you accepted the gift or reimbursement.

Value: Provide the fair market value of the gift(s) or travel reimbursement(s).

**Nothing to Report:** If you do not have anything to report, write "None."

Report Type:	
Year (Annual Report only):	
Date of Appointment/Termination:	



**Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)**

<b>Filer's Information</b>			
Last Name	First Name	MI	Position
			Agency
Other Federal Government Positions Held During the Preceding 12 Months:			
Name of Congressional Committee Consideration Nomination (Nominees only):			
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:			
Signature:		Date:	
Agency Ethics Official's Opinion – On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below)			
Signature:		Date:	
Other Review Conducted By:		Date:	
Signature:		Date:	
U.S. Office of Government Ethics Certification (if required):			
Signature:		Date:	
Comments of Reviewing Officials:			

[Instructions for Part 1](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number			
<b>Part 1: Filer's Positions Held Outside United States Government</b>					
#	Organization Name	City/State	Organization Type	Position Held	From To
1.					
2.					
3.					
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[Instructions for Part 2](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number			
<b>Part 2: Filer's Employment Assets and Income</b>					
#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
4.					
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[Instructions for Part 3](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number		
<b>Part 3: Filer's Employment Agreements and Arrangements</b>				
#	Employer or Party	City/State	Status and Terms	Date
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
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11.				
12.				

[Instructions for Part 4](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number	
<b>Part 4: Filer's Sources of Compensation Exceeding \$5,000 in a Year</b>			
#	Source Name	City/State	Brief Description of Duties
1.			
2.			
3.			
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10.			
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[Instructions for Part 5](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number			
<b>Part 5: Spouse's Employment Assets and Income</b>					
#	Description	EIF	Value	Income Type	Income Amount
1.					
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3.					
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[Instructions for Part 6](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number			
<b>Part 6: Other Assets and Income</b>					
#	Description	EIF	Value	Income Type	Income Amount
1.					
2.					
3.					
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[Instructions for Part 7](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number		
<b>Part 7: Transactions</b>				
#	Description	Type	Date	Amount
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
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[Instructions for Part 8](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number					
<b>Part 8: Liabilities</b>							
#	Creditor Name	Type	Amount	Year Incurred	Rate	Term	
1.							
2.							
3.							
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[Instructions for Part 9](#)

**Note: This is a public form. Do not include account numbers, street addresses, or family member names. See instructions for required information.**

Filer's Name		Page Number		
<b>Part 9: Gifts and Travel Reimbursements</b>				
#	Source Name	City/State	Brief Description	Value
1.				
2.				
3.				
4.				
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## Summary of Contents

### 1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation. This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

### 2. Filer's Employment Assets and Income

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

### 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

### 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period. The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

## **5. Spouse's Employment Assets and Income**

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

## **6. Other Assets and Income**

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children. This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## **7. Transactions**

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period. This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## **8. Liabilities**

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period. This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## **9. Gifts and Travel Reimbursements**

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## **Privacy Act Statement**

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## **Public Burden Information**

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

## **SPECIFICATIONS FOR TRANSMITTING REQUIRED DATA FROM AN AUTHORIZED LEGACY ELECTRONIC FILING SYSTEM**

This appendix describes the specifications for automated transmission of the data required by section IV of this Program Advisory. These specifications apply only to those agencies that OGE authorizes in 2015 to continue using legacy electronic filing systems. After OGE authorizes the use of a legacy system, OGE will provide the agency's designated point of contact with further instructions. Agency officials with questions regarding these specifications may contact Michael Hanson and Timothy Mallon at [integrity@oge.gov](mailto:integrity@oge.gov).

Note that the data required by section IV of this Program Advisory relates only to annual reports and combination annual-termination reports. It does not relate to new entrant reports, nominee reports, periodic transaction reports, or termination reports.

An authorized legacy electronic filing system must automatically transmit the required data to OGE either each day or, at a minimum, each business day. The automated transmission must be sent by email to an address that OGE will provide to the agency's designated point of contact. The transmitting agency will need to register its source email address with OGE before commencing automated reporting. OGE must receive the email between 12:01 a.m. and 6:00 a.m. each day or each business day.

The email transmission will be machine read and must strictly adhere to the following data formatting requirements:

- The authorized legacy electronic filing system must transmit data to OGE using a single line delimited string in the subject line of an email message.
- The format for the delimited string is: AGENCY NAME~REPORTING YEAR~REFERENCE DATE~NUMBER OF FILERS~NUMBER OF REPORTS FILED~NUMBER OF REVIEWS COMPLETED.
- The following is an example of a properly formatted delimited string: DEPARTMENT OF TECHNOLOGY~2016~02/10/2016~564~335~224.
- The delimiting character is "~".
- All letters in the delimited string must be displayed in capital letters.
- "Agency name" is the name exactly as displayed by OGE in the 2014 Agency Ethics Program Questionnaire.

- “Reporting year” is the year in which the report is due. For example, a “2016” annual report is a report that covers calendar year 2015 and is due to be filed in 2016.
- The “reference date” is the date for which all of the data in the delimited string was compiled. All items in the delimited string must use the same reference date, which means that the information reported for each item must accurately reflect the status of the item as it existed at the end of the day on the reference date. The reference date must be displayed in the following format: MM/DD/YYYY. For example, May 16, 2016, must be displayed as 05/16/2016.
- “Number of filers” is the number of agency employees who are required to file annual public financial disclosure reports, including combination annual-termination reports, in the reporting year. The value must be a positive integer or “0” (zero) and cannot be omitted.
- “Number of reports filed” is the number of annual public financial disclosure reports for the reporting year that have been filed by the employees who are required to file public financial disclosure reports in the reporting year. The value must be a positive integer or “0” (zero) and cannot be omitted.
- “Number of reviews completed” is the number of required reports for the reporting year that the agency has either certified or closed after declining certification. The value must be a positive integer or “0” (zero) and cannot be omitted.

**INSTRUCTIONS FOR TRANSMITTING REQUIRED DATA FROM AN AGENCY  
COLLECTING PUBLIC FINANCIAL DISCLOSURE REPORTS IN PAPER FORMAT**

OGE strongly recommends that agencies discontinue collecting public financial disclosure reports in paper format and adopt *Integrity* instead. Nevertheless, this appendix provides specifications applicable to agencies that continue to collect public financial disclosure reports in paper format (“paper-format agencies”) in the 2016 annual filing cycle, which begins January 1, 2016. These specifications address manual transmission of the data required by section IV of this Program Advisory. Agency officials who have questions regarding the specifications in this appendix may contact Michael Hanson and Timothy Mallon at [integrity@oge.gov](mailto:integrity@oge.gov).

Note that the data required by section IV of this Program Advisory relates only to annual reports and combination annual-termination reports. It does not relate to new entrant reports, nominee reports, periodic transaction reports, or termination reports.

The DAEO of a paper-format agency will be responsible for transmitting the required data manually to OGE once per month. The DAEO will use a web-based application on an External Portal that OGE has established to receive information from federal agencies. (This portal is located where the 2014 Agency Ethics Program Questionnaire was hosted.) Before January 1, 2016, OGE will establish a separate area at that location for a web-based application to enable manual entry of the required data. OGE will notify agencies once the web-based application has become active. At that time, agencies planning to use the web-based application will need to request an account and password from their OGE Desk Officers.

The required data must be transmitted not later than the last day of each calendar month and must reflect the status at the end of the 15<sup>th</sup> day of the month. If the last day of the month falls on a weekend or holiday, the transmission deadline will be the last business day of the month. The table below lists the deadlines in calendar year 2016. It does not include dates after December because OGE anticipates that agencies will have certified all annual reports by the end of the calendar year. In the case of an agency that has not completed the annual reporting cycle by the end of the calendar year, OGE may require the agency to establish a weekly or daily reporting schedule in early 2017 until the agency has completed the 2016 annual filing cycle.

<b>DATA MUST BE SUBMITTED TO OGE BY THE FOLLOWING DATE:</b>	<b>FOR THE FOLLOWING REFERENCE DATE:</b>
May 31, 2016	May 15, 2016
June 30, 2016	June 15, 2016
July 29, 2016	July 15, 2016
August 31, 2016	August 15, 2016
September 30, 2016	September 15, 2016
October 31, 2016	October 15, 2016
November 30, 2016	November 15, 2016
December 30, 2016	December 15, 2016

The web-based application will have formatting controls to ensure that reports are transmitted to OGE using the same data formatting requirements applicable to automated reporting through authorized legacy electronic filing systems, which are described in Appendix 4 to this Program Advisory. Additionally, after an initial report has been entered, a “certify unchanged” button will be available for quick confirmation that none of the data previously entered has changed, as may be the case when an agency’s last report indicated completion of the annual filing cycle. The application will be used exclusively for aggregate data, and DAEOs are responsible for ensuring that no personally identifiable information whatsoever is entered into the application. OGE will use the aggregate data submitted through the application to retrieve an automated report.

The data fields in the application on the External Portal will be the same as the data fields used by agencies with authorized legacy electronic filing systems for public financial disclosure reports. Those data fields are, as follows:

- Agency Name: The application will include a drop down list for the agency’s name.
- Reporting Year: The “reporting year” is the year in which the report is due. For example, a “2016” annual report is one that covers calendar year 2015 and is due in 2016.
- Reference Date: The “reference date” is the date for which the data was compiled. As explained above, the reference date is the 15th day of the month for which the data is submitted. Thus, on June 1, the agency will report the status of its processing of annual financial disclosure reports as of the close of business on May 15, and the reference date will be May 15. The reference date must be displayed in the following format: MM/DD/YYYY. For example, May 15, 2016, must be displayed as 05/15/2016.
- Number of Filers: The “number of filers” is the number of agency employees who are required to file annual public financial disclosure reports, including combination annual-termination reports, in the reporting year. The value must be a positive integer or “0” (zero) and cannot be omitted.
- Number of Reports Filed: The “number of reports filed” is the number of annual public financial disclosure reports for the reporting year that have been filed by the employees who are required to file public financial disclosure reports in the reporting year. The value must be a positive integer or “0” (zero) and cannot be omitted.
- Number of reviews completed: The “number of reviews completed” is the number of required reports for the reporting year that the agency has either certified or closed after declining certification. The value must be a positive integer or “0” (zero) and cannot be omitted.

**NON-EXHAUSTIVE EXAMPLES OF THE TYPES OF INCOME AND ASSETS  
THAT ARE REPORTED IN PARTS 2, 5, AND 6 OF THE OGE FORM 278e**

*Examples of Items Reportable in Part 2, “Filer’s Employment Assets and Income”*

- Filer’s bonus
- Filer’s consulting fee
- Filer’s deferred compensation
- Filer’s defined benefit pension plan
- Filer’s defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account)
- Filer’s director’s fee
- Filer’s employee stock ownership plan
- Filer’s employee stock purchase plan
- Filer’s employer stock obtained through employment (e.g., by exercising a stock option)
- Filer’s farming income
- Filer’s fee for serving as a trustee or as an executor or administrator of an estate
- Filer’s honorarium
- Filer’s incentive stock option
- Filer’s individual retirement account (IRA)
- Filer’s investment fund created by an employer solely for employees
- Filer’s law firm income
- Filer’s LLC income
- Filer’s long-term incentive plan
- Filer’s money purchase pension plan
- Filer’s partnership distribution
- Filer’s partnership distributive share
- Filer’s phantom stock
- Filer’s restricted stock
- Filer’s restricted stock unit
- Filer’s salary
- Filer’s self-funded defined benefit plan
- Filer’s severance payment from an employer
- Filer’s solo legal practice income
- Filer’s split-dollar life insurance
- Filer’s stock appreciation right

*Examples of Items Reportable in Part 5, “Spouse’s Employment Assets and Income”*

- Spouse’s bonus
- Spouse’s consulting fee

- Spouse's deferred compensation
- Spouse's defined benefit pension plan
- Spouse's defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account)
- Spouse's director's fee
- Spouse's employee stock ownership plan
- Spouse's employee stock purchase plan
- Spouse's employer stock obtained through employment (e.g., by exercising a stock option)
- Spouse's farming income
- Spouse's fee for serving as a trustee or as an executor or administrator of an estate
- Spouse's honorarium
- Spouse's incentive stock option
- Spouse's individual retirement account (IRA)
- Spouse's investment fund created by an employer solely for employees
- Spouse's law firm income
- Spouse's LLC income
- Spouse's long-term incentive plan
- Spouse's money purchase pension plan
- Spouse's partnership distribution
- Spouse's partnership distributive share
- Spouse's phantom stock
- Spouse's restricted stock
- Spouse's restricted stock unit
- Spouse's salary
- Spouse's self-funded defined benefit plan
- Spouse's severance payment from an employer
- Spouse's solo legal practice income
- Spouse's split-dollar life insurance
- Spouse's stock appreciation right

*Examples of Items Reportable in Part 6, "Other Assets and Income"*

- 529 plan (college savings plan or prepaid tuition plan)
- American depositary receipt
- annuity (fixed or variable) purchased on the market
- bank account
- beneficial interest in a trust
- brokerage account
- collectible item
- common trust fund of a bank
- corporate bond (not acquired through employment)
- equity index-linked note
- exchange-traded fund

- foreign exchange position (forex)
- futures contract
- government agency security
- investment fund unrelated to employment
- life insurance (universal, variable, or whole)
- loan made to another party
- managed account
- money market account
- money market mutual fund
- mutual fund
- oil, gas, or other mineral rights lease
- put or call option not acquired through employment
- real estate
- real estate holding company (e.g., REIT)
- short sale
- stock (not acquired through employment)
- sweep account
- Treasury security
- Uniform Gifts to Minors Act account
- Uniform Transfers to Minors Act account
- unit investment trust

## TIMELINE

January 1, 2015:

- *Integrity* launched
- Public filers not using *Integrity* may use either OGE Form 278e or OGE Form 278 through December 31, 2015

March 2, 2015:

- PA-15-01 issued
- 19 agencies currently using *Integrity*

July 1, 2015:

- Deadline for each DAEO to submit a notice regarding tentative plans for collecting public financial disclosure reports in calendar year 2016 (Note: Agencies listed in 5 U.S.C. app. § 105(a)(1) and components of the Executive Office of the President are excluded from this data call because OGE will work with those entities individually)
- Deadline for DAEOs and CIOs to submit any requests to continue using legacy electronic filing systems for public financial disclosure reports

January 1, 2016:

- *Integrity* required for (a) Senate-confirmed appointees whose reports are submitted to OGE under 5 U.S.C. app. § 103 and (b) DAEOs
- Public filers must use OGE Form 278e, unless an exception applies
- OGE will start collecting data on agencies' processing of annual public financial disclosure reports through *Integrity*
- Deadline for agencies using authorized legacy electronic filing systems to modify those systems to produce the new OGE Form 278e, unless OGE has granted an extension

March 30, 2016:

- End of an extension, if granted by OGE, for an authorized legacy electronic filing system to produce the new OGE Form 278e

May 31, 2016

- Agencies authorized to continue using legacy electronic filing systems will begin daily data transmissions on their agencies' processing of annual public financial disclosure reports through *Integrity*
- Agencies continuing to collect public financial disclosure reports in paper format will begin manually transmitting data on the processing of annual public financial disclosure reports on a monthly basis through December 31 each year and, in the cases of agencies that have not completed the annual filing cycle by that date, on a weekly or daily basis thereafter.
- (Note: No action required on the part of agencies using *Integrity* for all public reports.)

June 30, 2016:

- End of an extension, in those limited cases in which OGE determines that a second extension is warranted, for an authorized legacy electronic filing system to produce the new OGE Form 278e