

## **OGE Form 450**

### **Frequently Asked Questions**

#### **How is the information that I report used?**

The purpose of this report is to assist employees and their agencies in avoiding conflicts between official duties and private financial interests or affiliations. Your agency ethics official will use the information that you provide to determine whether any potential conflicts exist.

#### **Who may see my report?**

The primary person who will be reviewing your report is your agency ethics official. It is possible that a paralegal or an ethics specialist assisting the ethics official in reviewing OGE Form 450s will look at your form. Within the Department of Defense, your Supervisor also will review this report in accordance with the Joint Ethics Regulation. Other agencies may also require the filer's supervisor to review the form and sign it. The Privacy Act Statement lists other limited circumstances and persons who may have access to your report. In general, these reports are filed on a confidential basis and are required to be withheld from the public.

#### **How is my financial information protected?**

Your financial information is stored in this application and may be viewed by yourself, your supervisor, and the ethics counselors that support you. In addition, application administrators, in the course of administering the application and supporting its users, may view the financial data if necessary to maintain the application. Each application administrator is bound by Army regulation and a nondisclosure agreement to safeguard the information from unauthorized personnel.

If I have questions about completing my report whom do I contact for assistance?

The best person to contact is your ethics official or counselor.

#### **Special Government Employee**

##### **What report does a Special Government Employee (SGE) complete?**

All SGEs who are confidential filers complete a New Entrant report not only when they are initially appointed, but also upon each reappointment or redesignation as an SGE (5 C.F.R. § 2634.903(b)). This requirement includes SGEs who are serving on Federal advisory committees.

Note: SGE's appointed to serve on an advisory committee must file the new entrant report before rendering any advice, or no later than the first meeting. See 5 C.F.R. 2634.903(b)(3).

#### **Reporting Status**

##### **How do I know if I am an annual filer or a new entrant?**

You are probably an annual filer if last year you filed an OGE Form 450 (or an OGE Form 450-A).

You are a probably new entrant if you did not file an OGE Form 450 or an OGE Form 450-A last year.

Please check with your ethics counselor for verification.

## **Reporting Period**

### **What is the reporting period for an annual report?**

The reporting period for an annual report covers the preceding calendar year for which the report is due. For example, the reporting period is January 1, 200X through December 31, 200X for an annual report that is due by February 15, 200X + 1.

## **Appointment Date**

### **I am a new entrant. What is my date of appointment?**

Your date of appointment is the date that you began working in the position that requires you to file the OGE Form 450. It is not the date that you first began working for the federal Government unless that is when you started working in the position that requires you to file. If you are required to file the OGE 450 because of a recently assigned additional duty or accretion of duties (such as assignment to contractor officer representative duties), please enter the date that your supervisor decided that you needed to file an OGE 450 as your "date of appointment."

### **How will the ethics official use my appointment date?**

The ethics official must verify that you filed the report within 30 days of your appointment to the position or within 30 days of being informed that your position requires you file an OGE Form 450.

### **What if I have a break in service?**

A new entrant report is not required if, within 30 days of assuming your current position, you left another position in which you filed an OGE Form 450 or an OGE 278. A filer who filed a financial disclosure report previously should provide a copy of that report to the current agency.

## **Appointment Date (SGE)**

### **What report does a Special Government Employee (SGE) complete?**

All SGEs who are confidential filers complete a New Entrant report not only when they are initially appointed, but also upon each reappointment or redesignation as an SGE (5 C.F.R. § 2634.903(b)). This requirement includes SGEs who are serving on Federal advisory committees.

Note: SGE's appointed to serve on an advisory committee must file the new entrant report before rendering any advice, or no later than the first meeting. See 5 C.F.R. 2634.903(b)(3).

## **Pre-Populate Report**

### **Why should I use a previous report to pre-populate my new report?**

It facilitates the reporting process and provides for a consistent and accurate disclosure of information from one year to the next especially if there has been little change in the previously reported information.

## **Annual**

Is there an extension for service during a period of national emergency or in a combat zone?  
Yes. Consult with your ethics counselor for details.

**How do I request an extension?**

You should consult with your ethics officials or supervisor. Agencies may grant extensions of due dates for both new entrant and annual filers of up to 90 days for good cause (such as extended travel, significant illness, etc.).

**What happens if I do not file by the required due date?**

You may be subject to appropriate personnel or other action in accordance with applicable law or regulation for failing to file a confidential financial disclosure report, for filing such reports late, or for falsifying or failing to report required information. This may include adverse action under 5 CFR part 752, including suspension, reduction in grade, reduction in pay, etc.

**Are there any penalties for an incomplete or false report?**

Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

**New Entrant****What is the reporting period for a new entrant report?**

The reporting period for a new entrant report is the 12-month period preceding your filing of this form. Refer to your financial records for this 12-month period in order to provide the information requested on the form.

**Is there an extension for service during a period of national emergency or in a combat zone?**

Yes. Consult with your ethics counselor for details.

**How do I request an extension?**

You should consult with your ethics officials or supervisor. Agencies may grant extensions of due dates for both new entrant and annual filers of up to 90 days for good cause (such as extended travel, significant illness, etc.).

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**Non-Investment Income: Unknown, No Reportable Items, Reportable Items****What are some common mistakes I should avoid?**

Not listing the spouse's employer (if spouse is employed by an entity other than the Federal Government).

Using unexplained abbreviations and acronyms that do not fully identify the financial interest.

**My spouse works outside the home and earned \$75,000 during the reporting period. Do I have to list her employer on the form?**

Yes. Because your spouse earns more than \$1,000 from her employment, you must list her employer on the form.

**I am employed part-time as a professor at a local college. I'm paid only \$500 for teaching one class. Do I have to list the college on my report?**

Yes, if you earn more than \$1,000 from this part-time employment, you have to list it. In addition, you have to list it in the Outside Position section because your part-time employment as a professor is considered to be a reportable outside position.

**What non-investment income can I exclude?**

Do not report: Dependent child's earned income; Veterans' benefits; Federal Government salary; Social Security benefits.

**What are some examples of reportable non-investment income?**

Report fees, salaries, commissions, retirement benefits, honoraria, scholarships, prizes, and gambling income. For example: salary, Bryggadune University - former employer; spouse salary, Express Medical Clinic - employer; Association of Accountants - honoraria.

Example: A filer teaches a course at a local community college, for which she receives a salary of \$1,100 per year. She also received, during the previous reporting period, a \$1,100 award for outstanding local community service. She must disclose both.

Spouse salary example: A filer's husband has a seasonal part-time job as a sales clerk at a department store, for which he receives a salary of \$1,000 per year. He also received, during the previous reporting period, a \$250 award for outstanding local community service, and an honorarium of \$1,250 from the state university. The filer need not report either her husband's outside earned income or award because neither exceeded \$1,000. She must, however, report the source of the honorarium because it exceeded \$1,000.

**Do I have to report an honorarium donated to a charity?**

Yes, you must report any honorarium that you have received, even if it is donated to charity. If you specify or recommend that the payor give the honorarium directly to a charity, you still have "received" the honorarium and must report it.

What do I report if I made a donation to a charitable organization in lieu of an honorarium?

The name of the charity must be reported in addition to the name and location of the source.

**Non-Investment Income:**

**What are the instructions for this section?**

Report for yourself: (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, (2) honoraria greater than \$1,000, and (3) other non-investment income such as scholarships, prizes, and gambling income greater than \$1,000.

Report for your spouse: (1) all sources of salary, fees, commissions, and other earned income greater than \$1,000, and (2) honoraria greater than \$1,000.

Do Not Report: Federal Government retirement benefits, Thrift Savings Plan, certificates of deposit, savings or checking accounts, term life insurance, money market mutual funds and money market accounts, personal residence (unless rented), diversified mutual funds (e.g., ABC Equity Value Fund), US Government Treasury bonds, bills, notes, and savings bonds, money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child.

**What are some common mistakes I should avoid?**

1. Not listing the spouse's employer (if spouse is employed by an entity other than the Federal Government).
2. Using unexplained abbreviations and acronyms that do not fully identify the financial interest.

**My spouse works outside the home and earned \$75,000 during the reporting period. Do I have to list her employer on the form?**

Yes. Because your spouse earns more than \$1,000 from her employment, you must list her employer on the form.

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Example: A filer teaches a course at a local community college, for which she receives a salary of \$1,100 per year. She also received, during the previous reporting period, a \$1,100 award for outstanding local community service. She must disclose both.

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The name of the charity must be reported in addition to the name and location of the source.

**Asset and Investment Income: Unknown, No Reportable Items, Reportable Items****What are some common mistakes I should avoid?**

1. Not providing the complete or full specific name of each sector mutual fund, instead of listing the name of the fund family. For example: USAA Energy Fund instead of USAA Fund.
2. Not providing underlying assets of an investment (e.g., trust, 401(k), IRA, annuity, investment life insurance) or broker's account. Annual filers may use their end-of-year account statements to determine their reportable assets (e.g., those over \$1,000 or that earned over \$1,000 in income during the reporting period). New Entrants may ask their fund managers to provide an account summary for the 12 months prior to their appointment.
3. Not identifying the name and nature of business of all nonpublic partnerships, closely held corporations, and similar private business ventures.
4. Using unexplained abbreviations and acronyms that do not fully identify the financial interest.
5. Reporting assets that need not be reported. Do not report on your OGE Form 450 bank deposits, money market accounts and funds, and U.S. Government securities.
6. Not providing your or your spouse's non-Federal Government pension or retirement plan. If it includes only diversified mutual funds which are no longer required, to be reported note this in parenthesis in the Asset name with the plan provider. For example: "Mitre Corp Pension (only diversified mutual funds)".

**Do I have to report all assets that I owned during the reporting period and all investment income earned during this period?**

No, you have to report your assets (for example, stocks, sector mutual funds, bonds, and real estate) that are valued at more than \$1,000 at the end of the reporting period (e.g., December 31) OR that produced more than \$1,000 in income during the reporting period. For example, if you owned stock in ABC Inc. that was worth \$3,000 on December 31, you must list ABC Inc. on the form.

**I owned stock in a company this year, but I sold it before the end of the year. When I sold it, the stock was worth \$20,000, and it earned \$1500 in capital gains. Because I no longer own it, do I still have to report the name of the company on the OGE Form 450?**

Yes. Because the stock earned more than \$1,000 in income during the reporting period, you must report the name of the company on the form even though you did not own the stock at the end of the reporting period. Also, you must check the box in the "No longer held" column to indicate that you no longer own this stock.

**Do I have to report the value of the assets I report on the form or the amount of income that I or my spouse earns?**

No, you do not have to report this type of information.

**Do I have to report IRAs?**

Yes. Each asset that is in an IRA must be reported if it meets the reporting requirements. You may indicate that the assets are in an IRA if you wish, but you are not required to do so. And remember, it is NOT sufficient just to list "IRA" on the form. You have to report the underlying assets of the IRA.

Example: Suppose you have an IRA with five assets: \$1,500 in Vanguard Index 500; \$3,000 in Fidelity Magellan; \$2,000 Vanguard Health Care Fund; \$6,000 in IBM; and \$5,000 in Google. You must report the IBM and Google stock because they are each valued over \$1,000. You also must report the Vanguard Health Care fund because it is a sector fund, and its value is over the \$1,000 reporting threshold.

However, you do not have to report Vanguard Index 500 or Fidelity Magellan. Even though the value of each fund is more than \$1,000, they are exempt from disclosure because they are diversified mutual funds.

**I have only diversified mutual funds in my IRA. Do I have to report the IRA?**

In this case, you do not. Because all of the underlying assets in the IRA are diversified mutual funds and because diversified mutual funds do not have to be reported, you are not required to list your IRA assets (in the Assets section).

**I have a 401(k) with my former employer. Am I required to report the 401(k) on the form? If so, how do I report it?**

Yes, you are required to report the underlying assets in the 401(k). If you wish to indicate that the asset is in a 401(k), you may type "401(k)" next to the entry. You do not have to report an asset in the 401(k) if it is a type of asset that is exempt from the reporting requirements. Suppose you have the following assets in your 401(k): three diversified mutual funds, a sector mutual fund, and stock in two companies. You have to list the full name of the sector mutual fund and the names of the two companies. You do not have to list the names of the three diversified mutual funds because diversified mutual funds are no longer required to be reported.

**I have only diversified mutual funds in my 401(k). Do I have to report the 401(k)?**

You do not have to report the 401(k) in the Assets section but you do have to report this asset in the Arrangements and Agreements section.

List the 401(k) plan in Agreements or Arrangements because the plan is an agreement or arrangement with your former employer. In the Other Party box, list the name of your former employer (e.g., ABC Corporation) and the city and state in which it is located. In the Type of Agreement box, check the appropriate choice (e.g., Continuing participation in employee pension or benefit plan, Continuation of payments by former employer). In the Terms of Agreement or Arrangement box, describe the status and terms (e.g., ABC Corporation 401(k) plan will start paying out in 5 years).

**What assets can I exclude?**

Do not report:

Federal Government retirement benefits

Thrift Savings Plan;

Certificates of deposit, savings or checking accounts;

Term Life Insurance;

Money market mutual funds and money market accounts;

Your personal residence, unless you rent it out;

Diversified mutual funds, such as ABC Equity Value Fund or XYZ Large Capital Fund;

U.S. Government Treasury bonds, bills, notes, and savings bonds;

Money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child;  
Diversified funds within an employee benefit plan.

**What are some examples of reportable assets and investment income?**

Reportable assets include stocks, tax shelters, sector mutual funds, annuities, trust holdings, trades and businesses, investment life insurance, bonds, investment real estate, IRA/401(k) holdings, commodity futures, partnership interests, and collectibles held for investment.

Investment income includes dividends, rents and royalties, interest, and capital gains.

Example: A filer owns a beach house which he rents out for several weeks each summer, receiving annual rental income of approximately \$5,000. He must report the rental property, as well as the city and state in which it is located.

For example, a filer's investment portfolio consists of several stocks, U.S. Treasury bonds, several cash bank deposit accounts, an account in the Government's Thrift Savings Plan, and shares in sector mutual funds and diversified mutual funds. He must report the name of each sector mutual fund in which he owns shares, and the name of each company in which he owns stock, valued at over \$1,000 at the end of the reporting period or from which he received income of more than \$1,000 during the reporting period. He need not report his diversified mutual funds, U.S. Treasury bonds, bank deposit accounts, or Thrift Savings Plan holdings.

**What is a privately held trade or business and how do I report one?**

A privately held trade or business is one that is not publicly available or publicly traded. To report one, indicate the name in the Asset Name field and in the description field include the following: (1) nature of business and (2) location of the trade or business (city, state).

**What are sector mutual funds?**

A sector mutual fund is a mutual fund that concentrates its investments in an industry, business, or single country other than the United States or bonds of a single State within the United States such as ABC Electronics Fund or XYZ Canada Fund. Be sure to report the full name of the fund, not just the general family fund name. Consult with your ethics official if you have any questions.

**Do I report my spouse's assets if we are separated?**

If you are living apart from your spouse with the intent to divorce or separate permanently, you do not need to report your spouse's assets, income or liabilities. Otherwise, you must disclose your spouse's interests as required.

**Asset and Investment Income:**

**What are the instructions for this section?**

Report for Yourself, Spouse, and Dependent Child: Assets held for investment or the production of income with a value greater than \$1,000 at the end of the reporting period OR assets from which more than \$1,000 in income was received during the reporting period, including but not limited to: Assets such as stocks, bonds, annuities, trust holdings, partnership interests, life insurance, investment real estate, or a privately-held trade or business; Sector mutual funds: those funds invested in a particular industry, business, or location such as ABC Electronics Fund or XYZ Canada Fund (report the full name of the fund, not just the general family fund name); Holdings of retirement plans, such as 401(k)s or IRAs, investment life insurance, or variable annuities (list each holding except those listed under "Do Not Report" below); Defined benefit pension plans provided by a former employer (include the name of the employer).



Do Not Report: Federal Government retirement benefits; Thrift Savings Plan; certificates of deposit, savings or checking accounts; term life insurance; money market mutual funds and money market accounts; personal residence (unless rented); diversified mutual funds (e.g., ABC Equity Value Fund); US Government Treasury bonds, bills, notes, and savings bonds; diversified funds within an employee benefit plan; money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child.

**What are some common mistakes I should avoid?**

1. Not providing the complete or full specific name of each sector mutual fund, instead of listing the name of the fund family. For example: USAA Energy Fund instead of USAA Fund.
2. Not providing underlying assets of an investment (e.g., trust, 401(k), IRA, annuity, investment life insurance) or broker's account. Annual filers may use their end-of-year account statements to determine their reportable assets (e.g., those over \$1,000 or that earned over \$1,000 in income during the reporting period). New Entrants may ask their fund managers to provide an account summary for the 12 months prior to their appointment.
3. Not identifying the name and nature of business of all nonpublic partnerships, closely held corporations, and similar private business ventures.
4. Using unexplained abbreviations and acronyms that do not fully identify the financial interest.
5. Reporting assets that need not be reported. Do not report on your OGE Form 450 bank deposits, money market accounts and funds, and U.S. Government securities.
6. Not providing your or your spouse's non-Federal Government pension or retirement plan. If it includes only diversified mutual funds which are no longer required, to be reported note this in parenthesis in the Asset name with the plan provider. For example: "Mitre Corp Pension (only diversified mutual funds)".

**Do I have to report all assets that I owned during the reporting period and all investment income earned during this period?**

No, you have to report your assets (for example, stocks, sector mutual funds, bonds, and real estate) that are valued at more than \$1,000 at the end of the reporting period (e.g., December 31) OR from which more than \$1,000 in income was received during the reporting period. For example, if you owned stock in ABC Inc. that was worth \$3,000 on December 31, you must list ABC Inc. on the form.

**I owned stock in a company this year, but I sold it before the end of the year. When I sold it, the stock was worth \$20,000, and it earned \$1500 in capital gains. Because I no longer own it, do I still have to report the name of the company on the OGE Form 450?**

Yes. Because the stock earned more than \$1,000 in income during the reporting period, you must report the name of the company on the form even though you did not own the stock at the end of the reporting period. Also, you must check the box in the "No longer held" column to indicate that you no longer own this stock.

**Do I have to report the value of the assets I report on the form or the amount of income that I or my spouse earns?**

No, you do not have to report this type of information.

**Do I have to report IRAs?**

Yes. Each asset that is in an IRA must be reported if it meets the reporting requirements. You may indicate that the assets are in an IRA if you wish, but you are not required to do so. And remember, it is NOT sufficient just to list "IRA" on the form. You have to report the underlying assets of the IRA. Example: Suppose you have an IRA with five assets: \$1,500 in Vanguard Index 500; \$3,000 in Fidelity Magellan; \$2,000 Vanguard Health Care Fund; \$6,000 in IBM; and \$5,000 in Google. You must report the

IBM and Google stock because they are each valued over \$1,000. You also must report the Vanguard Health Care fund because it is a sector fund, and its value is over the \$1,000 reporting threshold. However, you do not have to report Vanguard Index 500 or Fidelity Magellan. Even though the value of each fund is more than \$1,000, they are exempt from disclosure because they are diversified mutual funds.

I have only diversified mutual funds in my IRA. Do I have to report the IRA?

In this case, you do not. Because all of the underlying assets in the IRA are diversified mutual funds and because diversified mutual funds do not have to be reported, you are not required to list your IRA assets (Assets section).

**I have a 401(k) with my former employer. Am I required to report the 401(k) on the form? If so, how do I report it?**

Yes, you are required to report the underlying assets in the 401(k). If you wish to indicate that the asset is in a 401(k), you may type "401(k)" next to the entry. You do not have to report an asset in the 401(k) if it is a type of asset that is exempt from the reporting requirements. Suppose you have the following assets in your 401(k): three diversified mutual funds, a sector mutual fund, and stock in two companies. You have to list the full name of the sector mutual fund and the names of the two companies. You do not have to list the names of the three diversified mutual funds because diversified mutual funds are no longer required to be reported.

**I have only diversified mutual funds in my 401(k). Do I have to report the 401(k)?**

You do not have to report the 401(k) in the Assets section but you do have to report this asset in the Arrangements and Agreements section.

List the 401(k) plan in Agreements or Arrangements because the plan is an agreement or arrangement with your former employer. In the Other Party box, list the name of your former employer (e.g., ABC Corporation) and the city and state in which it is located. In the Type of Agreement box, check the appropriate choice (e.g., Continuing participation in employee pension or benefit plan, Continuation of payments by former employer). In the Terms of Agreement or Arrangement box, describe the status and terms (e.g., ABC Corporation 401(k) plan will start paying out in 5 years).

**I am still not sure if I understand the difference between a diversified mutual fund and a sector mutual fund. It would be easier for me simply to list all of my mutual funds. Am I prohibited from listing all of my funds?**

No, you are not prohibited from listing diversified mutual funds and may do so if you choose to, or are not sure which funds are "diversified."

**How do I report my investment in TIAA-CREF?**

TIAA-CREF offers many investment options, such as annuities and mutual funds. First you must review your statements pertaining to your TIAA-CREF investments to determine exactly which investments you selected for your account. Then check the investments to determine if any fall into one of the categories of reportable information. For example, if your TIAA-CREF plan contains the TIAA Traditional Annuity, the CREF Stock Account, and the TIAA Real Estate Account, you are required to report the TIAA Traditional Annuity and the TIAA Real Estate Account, but you are not required to report the CREF Stock Account because it is a diversified mutual fund. In addition, you may need to report the TIAA-CREF plan in the Agreements or Arrangements section.

**What assets can I exclude?**

Do not report:

Federal Government retirement benefits

Thrift Savings Plan;

Certificates of deposit, savings or checking accounts;

Term Life Insurance;

Money market mutual funds and money market accounts;

Your personal residence, unless you rent it out;

Diversified mutual funds, such as ABC Equity Value Fund or XYZ Large Capital Fund;

U.S. Government Treasury bonds, bills, notes, and savings bonds;

Money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child;

Diversified funds within an employee benefit plan.

**What are some examples of reportable assets and investment income?**

Reportable assets include stocks, tax shelters, sector mutual funds, annuities, trust holdings, trades and businesses, investment life insurance, bonds, investment real estate, IRA/401(k) holdings, commodity futures, partnership interests, and collectibles held for investment.

Investment income includes dividends, rents and royalties, interest, and capital gains.

Example: A filer owns a beach house which he rents out for several weeks each summer, receiving annual rental income of approximately \$5,000. He must report the rental property, as well as the city and state in which it is located.

For example, a filer's investment portfolio consists of several stocks, U.S. Treasury bonds, several cash bank deposit accounts, an account in the Government's Thrift Savings Plan, and shares in sector mutual funds and diversified mutual funds. He must report the name of each sector mutual fund in which he owns shares, and the name of each company in which he owns stock, valued at over \$1,000 at the end of the reporting period or from which he received income of more than \$1,000 during the reporting period. He need not report his diversified mutual funds, U.S. Treasury bonds, bank deposit accounts, or Thrift Savings Plan holdings

**What are examples of "other" asset types?**

Use the "Other" category for items that do not fit specific categories. Report any asset having a fair market value over \$1,000 held by the filer at the end of the reporting period in a trade or business, or for investment or the production of income, including Livestock owned for commercial purposes; Commercial crops, either standing or held in storage; Antiques or art held for resale or investment; Accounts or other funds receivable; and Capital accounts or other asset ownership in businesses.

**What are sector mutual funds?**

A sector mutual fund is a mutual fund that concentrates its investments in an industry, business, or single country other than the United States or bonds of a single State within the United States such as ABC Electronics Fund or XYZ Canada Fund. Be sure to report the full name of the fund, not just the general family fund name. Consult with your ethics official if you have any questions.

**What should I enter for the "Asset Name"?**

Indicate the full name of each specific asset or investment. For example: Microsoft, MSFT; IRA: Smith Gold Fund. For stocks and sector mutual funds, you may add the ticker symbol after the full asset name.

**Should I enter a street address for a rental property?**

No, only city, state, and country are necessary. You should also describe its nature and location, such as "residential real estate, Wapakoneta, Ohio."

**What type of asset is a Real Estate Investment Trust (REIT)?**

When reporting a REIT, select "Sector Mutual Fund, Investment Fund, or Pool" as its Asset Type.

**Do I report my spouse's assets if we are separated?**

If you are living apart from your spouse with the intent to divorce or separate permanently, you do not need to report your spouse's assets, income or liabilities. Otherwise, you must disclose your spouse's interests as required.

**Liabilities: Unknown, No Reportable Items, Reportable Items****What are some common mistakes I should avoid?**

1. Reporting liabilities that need not be reported. Do not report on your OGE Form 450 personal auto loans, student loans, credit card debt, or loans from financial institutions that are generally available to the public and mortgages on the filer's personal residence.
2. Using unexplained abbreviations and acronyms that do not fully identify the liability.

**What liabilities can I exclude?**

Do not report:

Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public.

Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures.

Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child

**What are some examples of reportable liabilities?**

A liability over \$10,000 owed at any time during the reporting period, other than a loan from a financial institution or business entity granted on terms made available to the general public

A loan over \$10,000 from an individual, such as a friend or a business associate

Examples: John Jones (Denver, CO) - Personal loan from a friend; ANW Investment Company (San Francisco, CA) - Margin account (over \$10,000 borrowed during reporting period).

Another example of reportable liabilities.

Example: A filer owes \$2,500 to his mother-in-law and \$12,000 to his best friend. He also has a \$15,000 balance on his credit card, a \$200,000 mortgage on his personal residence, and a car loan. Under the financial disclosure reporting requirements, he need not report the debt to his mother-in-law, his credit card balance, his mortgage, or his car loan. He must, however, report the debt of over \$10,000 to his best friend.

Do I have to report revolving charge accounts?

No, you do not have to report revolving charge accounts (for example, a credit card account).

Do I have to report my home mortgage or home equity loan?

No, you do not have to report a mortgage or home equity loan secured by your or your spouse's personal residence.

My spouse and I own a house that we rent out for additional income. I reported the house as an asset because it produced more than \$1000 in income for the reporting period (and it is worth more than \$1,000). Do I also report the mortgage?

Probably not, as long as the mortgage is from a financial institution or business entity and the mortgage was granted on terms made available to the general public.

### **Liability:**

#### **What are the instructions for this section?**

Report for Yourself, Spouse, and Dependent Child: If you are a new entrant filer, a liability that exceeded \$10,000 at the end of the reporting period. If you are an annual filer, a liability that exceeded \$10,000 during the reporting period.

Do Not Report: Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public; Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures; or Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child.

#### **What are some common mistakes I should avoid?**

1. Reporting liabilities that need not be reported. Do not report on your OGE Form 450 personal auto loans, student loans, credit card debt, or loans from financial institutions that are generally available to the public and mortgages on the filer's personal residence.
2. Using unexplained abbreviations and acronyms that do not fully identify the liability.

#### **What liabilities can I exclude?**

Do not report:

Any liability, such as a mortgage, a student loan, or a credit card account, from a financial institution or business entity granted on terms made available to the general public

Loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures

Liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child

#### **What are some examples of reportable liabilities?**

A liability over \$10,000 owed at any time during the reporting period, other than a loan from a financial institution or business entity granted on terms made available to the general public

A loan over \$10,000 from an individual, such as a friend or a business associate

Examples: John Jones (Denver, CO) - Personal loan from a friend; ANW Investment Company (San Francisco, CA) - Margin account (over \$10,000 borrowed during reporting period)

#### **Another example of reportable liabilities.**

Example: A filer owes \$2,500 to his mother-in-law and \$12,000 to his best friend. He also has a \$15,000 balance on his credit card, a \$200,000 mortgage on his personal residence, and a car loan. Under the financial disclosure reporting requirements, he need not report the debt to his mother-in-law, his credit

card balance, his mortgage, or his car loan. He must, however, report the debt of over \$10,000 to his best friend.

**Do I have to report revolving charge accounts?**

No, you do not have to report revolving charge accounts (for example, a credit card account).

**Do I have to report my home mortgage or home equity loan?**

No, you do not have to report a mortgage or home equity loan secured by your or your spouse's personal residence.

My spouse and I own a house that we rent out for additional income. I reported the house as an asset because it produced more than \$1000 in income for the reporting period (and it is worth more than \$1,000). Do I also report the mortgage?

Probably not, as long as the mortgage is from a financial institution or business entity and the mortgage was granted on terms made available to the general public.

**Outside Positions: Unknown, No Reportable Items, Reportable Items**

I am on the Board of Directors of my condo association. Do I have to report that position even though it couldn't be a conflict with my job?

Yes. You must report any position where you serve as a Director of an entity.

**My husband is a partner in a local law firm and he is also the President of our son's PTA. Do these positions have to be reported?**

You don't have to report a spouse's positions. However, you must report as "non-investment income," the name of any person or entity that paid your spouse at least \$1,000 during the reporting period. Therefore, you must list your husband's law firm in the "non-investment income" section. In addition, if the spouse has a capital account in the law firm that account would be reported in the Assets section.

**What outside positions can I exclude?**

Do not report:

Any position with a religious entity, social entity, fraternal entity, or political entity;

Any position held by your spouse or dependent child;

Any position that you hold as part of your official duties;

**What are some examples of reportable outside positions?**

Examples of reportable outside positions are positions you hold as an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of:

(1) any corporation, company, firm, partnership, trust, or other business entity;

(2) any non-profit organization;

(3) any educational institution;

(4) any other organization outside the United States Federal Government, such as with state or local governments.

For example: Professor, Bryggadune University (Memphis, TN), educational institution; Trustee, Family Trust ISK Family Trust (Boynton Beach, FL); Member, Scenic Rivers Association (Nashville, TN), Non-profit environmental organization.

Example: A filer holds outside positions as the trustee of his family trust, the secretary of a local political party committee, and the "Chairman emeritus" of his town's Lions Club. He also is a principal of a

tutoring school on weekends. The individual must report his outside positions as trustee of the family trust and as principal of the school. He does not need to report his positions as secretary of the local political party committee or "Chairman emeritus" because each of these positions is exempt.

### **Outside Position:**

#### **What are the instructions for this section?**

Report for yourself: All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of any of the following: Corporation, partnership, trust, or other business entity; Non-profit or volunteer organization; Educational institution; State or Local Government. Do Not Report: Any position with a Religious entity; Social entity; Fraternal entity; Political entity; any position held by your spouse or dependent child; any position that you hold as part of your official duties.

#### **I am on the Board of Directors of my condo association. Do I have to report that position even though it couldn't be a conflict with my job?**

Yes. You must report any position where you serve as a Director of an entity.

#### **My husband is a partner in a local law firm and he is also the President of our son's PTA. Do these positions have to be reported?**

You don't have to report a spouse's positions. However, you must report as "non-investment income," the name of any person or entity that paid your spouse at least \$1,000 during the reporting period. Therefore, you must list your husband's law firm in the "non-investment income" section. In addition, if the spouse has a capital account in the law firm that account would be reported in the Assets section.

#### **What outside positions can I exclude?**

Do not report:

- Any position that you hold as part of your official duties;
- Any position with a religious entity, social entity, fraternal entity, or political entity;
- Any position that is solely of an honorary nature, such as those with an emeritus designation;
- Any position held by your spouse or dependent child.

#### **What are some examples of reportable outside positions?**

Examples of reportable outside positions are positions you hold as an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of:

- (1) any corporation, company, firm, partnership, trust, or other business entity;
- (2) any non-profit organization;
- (3) any educational institution;
- (4) any other organization outside the United States Federal Government, such as with state or local governments.

For example: Professor, Bryggadune University (Memphis, TN), educational institution; Trustee, Family Trust ISK Family Trust (Boynton Beach, FL); Member, Scenic Rivers Association (Nashville, TN), Non-profit environmental organization.

Example: A filer holds outside positions as the trustee of his family trust, the secretary of a local political party committee, and the "Chairman emeritus" of his town's Lions Club. He also is a principal of a tutoring school on weekends. The individual must report his outside positions as trustee of the family

trust and as principal of the school. He does not need to report his positions as secretary of the local political party committee or "Chairman emeritus" because each of these positions is exempt.

#### **Agreements or Arrangements: Unknown, No Reportable Items, Reportable Items**

**After I retire, I would like to work in a restaurant owned by a friend of mine. We have never talked about it, but I thought I'd approach him as I get closer to my retirement date. Do I have to report this prospective employment?**

Based on how you have described the situation, you don't really have a reportable arrangement or agreement for employment yet. However, once you have started discussions about possible future employment, you should get more specific guidance right away from your ethics official. You may have to report an agreement on next year's form.

#### **Do I report my 401(k)?**

Yes, you must list the 401(k) plan in Agreements or Arrangements because the plan is an agreement or arrangement with your former employer. In the Other Party box, list the name of your former employer (e.g., ABC Corporation) and the city and state in which it is located. In the Type of Agreement box check the appropriate choice (e.g., Continuing participation in employee pension or benefit plan, Continuation of payments by former employer). In the Terms of Agreement or Arrangement box, describe what will happen to the plan while you are a Government employee (e.g., I will keep my 401(k) plan with ABC Corporation).

#### **What agreements or arrangements can I exclude?**

Do not report:

Any agreement or arrangement related to your employment by the Federal Government;

Spouse's or dependent child's agreements or arrangements.

Continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions.

#### **What are some examples of reportable agreements and arrangements?**

Examples of reportable agreements and arrangements are:

1. Future non-Federal employment;
2. A leave of absence from private or other non-Federal employment;
3. Continuation of payments by a former employer other than the Federal Government (including severance payments);
4. Continuing participation in an employee pension or benefit plan maintained by a former employer other than the Federal Government.

Examples:

A filer plans to retire from Government service in eight months. She has negotiated an arrangement for part-time employment with a private-sector company, to commence upon her retirement. On her financial disclosure report, she must identify the future employer, and briefly describe the terms of, this agreement and disclose the date on which she entered into the agreement.

A new employee who has entered a position which requires the filing of a confidential form is on a leave of absence from his private-sector employment. During his Government tenure, he will continue to receive deferred compensation from this employer, and will continue to participate in its pension plan. He must report and briefly describe his arrangements for a leave of absence, for the receipt of deferred compensation, and for participation in the pension plan.



**Do I have to report my TIAA-CREF plan?**

TIAA-CREF offers retirement plans for employees of educational institutions and research organizations, and they offer retail mutual funds to the general public. If you invested in TIAA-CREF through your former employer such as a university, then you must report the TIAA-CREF plan because it is an agreement or arrangement with your former employer. Even if your TIAA-CREF plan contains diversified mutual funds only, you still must report the plan when you invested in the plan through your former employer.

**How do I report my TIAA-CREF plan from a former employer?**

In the Other Party box, list the name of your former employer (e.g., University of Maryland) and the city and state in which it is located. In the Type of Agreement box check "Other" and type in TIAA-CREF. In the Terms of Agreement or Arrangement box, describe what will happen to the plan while you are a government employee. If, for example, the University of Maryland is your former employer and you will keep your TIAA-CREF plan with them, you will make the following entry in the Terms of Agreement or Arrangement box: "I will keep my TIAA-CREF plan with the University of Maryland."

**Do I need to disclose severance agreements?**

Yes, you must report continuing payments from a former employer, including severances and payments not yet received from previous work.

**Do I need to disclose any arrangements or agreements with a future employer?**

You must report any arrangements and agreements for future non-Federal employment.

**Do I need to disclose my participation in a United States Government benefit plan?**

No, information concerning employment by the Federal Government, and payments or other benefits received from the United States is not reportable.

**Agreement or Arrangement:****What are the instructions for this section?**

Report Your Agreements or Arrangements for: Continuing participation in an employee pension or benefit plan maintained by a former employer; a leave of absence; future employment, including date you accepted employment offer; and continuation of payment by a former employer (including severance payments).

Do Not Report: Any agreement or arrangement related to your employment by the Federal Government or Spouse's and dependent child's agreements or arrangements; continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions.

After I retire, I would like to work in a restaurant owned by a friend of mine. We have never talked about it, but I thought I'd approach him as I get closer to my retirement date. Do I have to report this prospective employment?

Based on how you have described the situation, you don't really have a reportable arrangement or agreement for employment yet. However, once you have started discussions about possible future employment, you should get more specific guidance right away from your ethics official. You may have to report an agreement on next year's form.

**Do I report my 401(k)?**

Yes, you must list the 401(k) plan in Agreements or Arrangements because the plan is an agreement or arrangement with your former employer. In the Other Party box, list the name of your former employer (e.g., ABC Corporation) and the city and state in which it is located. In the Type of Agreement box check the appropriate choice (e.g., Continuing participation in employee pension or benefit plan, Continuation of payments by former employer). In the Terms of Agreement or Arrangement box, describe what will happen to the plan while you are a Government employee (e.g., I will keep my 401(k) plan with ABC Corporation).

**What agreements or arrangements can I exclude?**

Do not report:

Any agreement or arrangement related to your employment by the Federal Government;

Spouse's or dependent child's agreements or arrangements.

Continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions.

**What are some examples of reportable agreements and arrangements?**

Examples of reportable agreements and arrangements are:

1. Future non-Federal employment;
2. A leave of absence from private or other non-Federal employment;
3. Continuation of payments by a former employer other than the Federal Government (including severance payments);
4. Continuing participation in an employee pension or benefit plan maintained by a former employer other than the Federal Government.

Examples:

A filer plans to retire from Government service in eight months. She has negotiated an arrangement for part-time employment with a private-sector company, to commence upon her retirement. On her financial disclosure report, she must identify the future employer, and briefly describe the terms of, this agreement and disclose the date on which she entered into the agreement.

A new employee who has entered a position which requires the filing of a confidential form is on a leave of absence from his private-sector employment. During his Government tenure, he will continue to receive deferred compensation from this employer, and will continue to participate in its pension plan. He must report and briefly describe his arrangements for a leave of absence, for the receipt of deferred compensation, and for participation in the pension plan.

**Do I have to report my TIAA-CREF plan?**

TIAA-CREF offers retirement plans for employees of educational institutions and research organizations, and they offer retail mutual funds to the general public. If you invested in TIAA-CREF through your former employer such as a university, then you must report the TIAA-CREF plan because it is an agreement or arrangement with your former employer. Even if your TIAA-CREF plan contains diversified mutual funds only, you still must report the plan when you invested in the plan through your former employer.

**How do I report my TIAA-CREF plan from a former employer?**

In the Other Party box, list the name of your former employer (e.g., University of Maryland) and the city and state in which it is located. In the Type of Agreement box check "Other" and type in TIAA-CREF. In the Terms of Agreement or Arrangement box, describe what will happen to the plan while you are a government employee. If, for example, the University of Maryland is your former employer and you will

keep your TIAA-CREF plan with them, you will make the following entry in the Terms of Agreement or Arrangement box: "I will keep my TIAA-CREF plan with the University of Maryland."

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You must report any arrangements and agreements for future non-Federal employment.

**Do I need to disclose my participation in a United States Government benefit plan?**

No, information concerning employment by the Federal Government, and payments or other benefits received from the United States is not reportable.

**Gifts and Travel Reimbursements: Unknown, No Reportable Items, Reportable Items**

The instructions say to report gifts and travel-related reimbursements that I, my spouse, and my dependent child received during the reporting period. What does the term "dependent child" mean? A dependent child is a son, daughter, step-son, or stepdaughter who is either unmarried and under age 21 and living in the filer's house, OR considered dependent under the U.S. tax code.

The instructions inform me to report travel-related reimbursements and gifts totaling more than \$390 from any one source during the reporting period. They also instruct me that I do not have to report any item valued at \$156 or less, nor do I even include such an item in calculating the aggregation threshold. Where do these numbers come from?

These amounts are tied under the Ethics in Government Act and OGE regulations to the "minimal value" for reporting foreign gifts under the Foreign Gifts and Decorations Act. The General Services Administration redefines this value every three years. The last revision occurred in 2017. See <https://www.gsa.gov/policy-regulations/policy/personal-property-management-policy/foreign-gifts>.

**What gifts or travel reimbursements can I exclude?**

Do not report:

Anything received from relatives, the U.S. Government, D.C., State, or local governments;

Bequests and other forms of inheritance;

Gifts and travel reimbursements given to your agency in connection with your official travel;

Non-business gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises;

Anything received by your spouse or dependent child totally independent of their relationship to you.

**What are some examples of reportable gifts and travel reimbursements?**

Dee, Jones & Smith - Designer leather briefcase (Example of a gift totaling more than \$390 from one source).

CGH Culinary Institute - Airline ticket, hotel room, and meals incident to culinary seminar in Tokyo, Japan from May 1-5, 200X (Example of travel reimbursement).

A filer accepts a briefcase, a pen and pencil set, a paperweight, and an iPad from a community service organization he has worked with solely in his private capacity. He determines that the value of these gifts is:

Gift 1--Briefcase: \$1000

Gift 2--Pen and Pencil Set: \$35

Gift 3--Paperweight: \$5

Gift 4--iPad: \$275

The filer must disclose gifts 1 and 4 since, together, they aggregate more than \$390 in value from the same source. He need not aggregate or report gifts 2 and 3 because each gift's value does not exceed \$156.

Note: Do not report any gift with a fair market value of \$156 or less. You are required to report gifts on your financial disclosure report if you receive, during the reporting period, gifts from any one source having a total fair market value of more than \$390 beginning 1 January 2017. When you are determining if the gifts you received from a single source add up to more than \$390, you do not count any gift that has a fair market value of \$156 or less. For example, if you receive three gifts from the same source and each has a fair market value of \$100, you do not report any of them.

**Who qualifies as a relative for the purposes of exclusion?**

A relative is any individual who is your father, mother, son, daughter, brother, sister, uncle, aunt, great uncle, great aunt, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson, granddaughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, your spouse, your grandfather or grandmother, or your fiancé or fiancée.

**What qualifies as "personal hospitality" for the purposes of exclusion?**

Personal hospitality of any individual means hospitality extended for a non-business purpose by an individual, not a corporation or organization, at the personal residence of, or on property or facilities owned by, that individual or his family.

**Do I need to report all food and beverages given to me?**

Yes, unless the food and/or beverage falls into a gift exclusion or exception under the Federal rules.

Please consult with your ethics counselor. For events occurring after 31 Dec 2018, filers may no longer deduct the cost of food and beverages when determining the value of the event. The value of that gift is the face value of the ticket.

**Do I have to report travel gifts from a potential employer when I am looking for a job after my federal career?**

Yes, you must report gifts of travel received as part of a job interview process.

**Do I need to report gift items in the nature of communications to my office, like subscriptions to newspapers and periodicals?**

No, these types of gifts are excluded because they are not gifts to you personally.

**Do I need to attach a disqualification statement?**

A disqualification statement should only be attached after you have consulted with your ethics counselor, who has determined that this is the appropriate vehicle with which to alleviate a conflict of interest. If a disqualification statement has been signed, it must be attached.

## **Gift and Travel Reimbursement:**

### **What are the instructions for this section?**

Report for Yourself, Spouse, and Dependent Child: Travel-related reimbursements (items such as lodging, transportation, and food) totaling more than \$390\* from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip; Any other gifts totaling more than \$390\* from any one source during the reporting period.

\*If you received more than one gift from one source: 1. Determine the value of each item you received from that source 2. Ignore each item valued at \$156 or less 3. Add the value of those items valued at more than \$156; if the total is more than \$390 then you must list those items.

Do not report: Anything received from relatives, the U.S. Government, D.C., state, or local governments; Bequests and other forms of inheritance; Gifts and travel reimbursements given to your agency in connection with your official travel; Gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; Anything received by your spouse or dependent child totally independent of their relationship to you.

The instructions say to report gifts and travel-related reimbursements that I, my spouse, and my dependent child received during the reporting period. What does the term "dependent child" mean? A dependent child is a son, daughter, stepson, or stepdaughter who is either unmarried and under age 21 and living in the filer's house, OR considered dependent under the U.S. tax code.

**The instructions inform me to report travel-related reimbursements and gifts totaling more than \$390 from any one source during the reporting period. They also instruct me that I do not have to report any item valued at \$156 or less, nor do I even include such an item in calculating the aggregation threshold. Where do these numbers come from?**

These amounts are tied under the Ethics in Government Act and OGE regulations to the "minimal value" for reporting foreign gifts under the Foreign Gifts and Decorations Act. The General Services Administration redefines this value every three years. The last revision occurred in 2017. See <https://www.gsa.gov/policy-regulations/policy/personal-property-management-policy/foreign-gifts>.

### **How do I report a gift of travel?**

You must disclose the travel itinerary, the dates of travel, the nature of expenses provided; and a description of the gift. Reporting of the gift must include the identity of the source.

### **How do I report a travel reimbursement?**

You must disclose the travel itinerary, the dates of travel, the nature of expenses provided and a description of the reimbursement. Reporting of the reimbursement must include the identity of the source.

### **How do I report gifts from non-profit organizations accepted under 5 U.S.C. Section 4111?**

You must report that the gift was received pursuant to the Government Employees Training Act, 5 U.S.C. Section 4111. This authority allows a government employee to accept travel expenses from certain non-profit organizations for training or meetings, even though the trip is for official duty. In addition, the filer must disclose the following: the travel itinerary, the dates of travel, the nature of expenses provided and a description of the gift. Reporting of the gift must include the identity of the source.

**How do I report other kinds of gifts?**

You must identify the source of a gift and provide a brief description if all gifts that you received from that source exceed \$390. When calculating the aggregate value of reportable gifts from one source, you do not need to include any individual gift that is worth \$156 or less. If the aggregate value is \$390 or greater, you should report all individual gifts from that particular source that are worth more than \$156. If the aggregate value is no more than \$390, you do not need to report any gifts from that source, regardless of the value of the individual gifts.

For example: A filer received three gifts from the same source. Gift 1 was worth \$55; Gift 2 was worth \$255; Gift 3 was worth \$160. In this hypothetical situation, Gift 1 is not included in the aggregate value of gifts from the source because it is not worth more than \$156. The filer should add only Gift 2 and Gift 3 to determine the aggregate value of reportable gifts. In this instance the aggregate value is \$415 (\$255 + \$160). This aggregate value is greater than the \$390 reporting threshold. Therefore, the filer should report Gift 2 and Gift 3 on the OGE Form 450

**What are some examples of reportable gifts and travel reimbursements?**

Dee, Jones & Smith - Designer leather briefcase (Example of a gift totaling more than \$390 from one source).

CGH Culinary Institute - Airline ticket, hotel room, and meals incident to culinary seminar in Tokyo, Japan from May 1-5, 200X (Example of travel reimbursement).

A filer accepts a briefcase, a pen and pencil set, a paperweight, and an iPad from a community service organization he has worked with solely in his private capacity. He determines that the value of these gifts is:

Gift 1--Briefcase: \$1000

Gift 2--Pen and Pencil Set: \$35

Gift 3--Paperweight: \$5

Gift 4--iPad: \$275

The filer must disclose gifts 1 and 4 since, together, they aggregate more than \$390 in value from the same source. He need not aggregate or report gifts 2 and 3 because each gift's value does not exceed \$156.

Note: Do not report any gift with a fair market value of \$156 or less. You are required to report gifts on your financial disclosure report if you receive, during the reporting period, gifts from any one source having a total fair market value of more than \$390 beginning 1 January 2017. When you are determining if the gifts you received from a single source add up to more than \$390, you do not count any gift that has a fair market value of \$156 or less. For example, if you receive three gifts from the same source and each has a fair market value of \$100, you do not report any of them.

**What gifts or travel reimbursements can I exclude?**

Do not report:

Anything received from relatives, the U.S. Government, D.C., State, or local governments;

Bequests and other forms of inheritance;

Gifts and travel reimbursements given to your agency in connection with your official travel;

Non-business gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises;

Anything received by your spouse or dependent child totally independent of their relationship to you

**Who qualifies as a relative for the purposes of exclusion?**

A relative is any individual who is your father, mother, son, daughter, brother, sister, uncle, aunt, great uncle, great aunt, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson,

granddaughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, your spouse, your grandfather or grandmother, or your fiancé or fiancée.

**What qualifies as "personal hospitality" for the purposes of exclusion?**

Personal hospitality of any individual means hospitality extended for a non-business purpose by an individual, not a corporation or organization, at the personal residence of, or on property or facilities owned by, that individual or his family.

**Do I have to report gifts of travel, lodging, and/or meals?**

Gifts of travel for personal or unofficial purposes, and gifts of training under 5 U.S.C. § 4111 must be reported if they exceed \$390. Do not report travel expenses or meals accepted by the U.S. Government (e.g., travel payments accepted under 31 U.S.C. § 1353). Consult your Ethics Counselor if you have any questions.

**Do I need to report all food and beverages given to me?**

Yes, unless the food and/or beverage falls into a gift exclusion or exception under the Federal rules. Please consult with your ethics counselor. For events occurring after 31 Dec 18, filers may no longer deduct the cost of food and beverages when determining the value of the event. The value of that gift is the face value of the ticket.

**Do I need to report reimbursements for political trips?**

Yes, unless the trip must be reported to the FEC under Section 304 of the Federal Election Campaign Act of 1971

The following political travel-related reimbursements are not reported to the FEC and, therefore, must be disclosed:

Reimbursements paid by a State or local candidate;

Reimbursements paid by a State or local party committee or non-federal committee exclusively for a State or local election event;

Reimbursements paid by a "527" group exclusively for a State or local election event; and

Reimbursements paid by a "connected organization" for a PAC fundraising event that only members of the political committee or representatives of committee donors will attend.

**Do I have to report travel gifts from a potential employer when I am looking for a job after my federal career?**

Yes, you must report gifts of travel received as part of a job interview process in the same manner as you would report any other gift.

**Do I need to report mementos of a function at which I was honored?**

No, suitable mementos (items with little intrinsic value such as plaques, certificates, and trophies, which are intended primarily for presentation) are excluded.

**Do I need to report gift items in the nature of communications to my office, like subscriptions to newspapers and periodicals?**

No, these types of gifts are excluded because they are not gifts to you personally.

**Do I need to attach a disqualification statement?**

A disqualification statement should only be attached after you have consulted with your ethics counselor, who has determined that this is the appropriate vehicle with which to alleviate a conflict of interest. If a disqualification statement has been signed, it must be attached.

**Certify Report Contents****Re-Certify Report Contents****Report Ready for Submission (Report Condition)**

If I decide to review my report one last time, how do I get back here to submit it?

When you are ready to submit your report, click on eSign in the Report Data progress bar to get back to this page. Or, you can click Continue through the report to eSign.

**What happens if I do not file by the required due date?**

You may be subject to appropriate personnel or other action in accordance with applicable law or regulation for failing to file a confidential financial disclosure report, for filing such reports late, or for falsifying or failing to report required information. This may include adverse action under 5 CFR part 752, including suspension, reduction in grade, reduction in pay, etc.

**Are there any penalties for an incomplete or false report?**

Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

**How do I request an extension?**

You should consult with your ethics officials or supervisor. Agencies may grant extensions of due dates for both new entrant and annual filers of up to 90 days for good cause (such as extended travel, significant illness, etc.).

**How do I get back here to submit my report?**

Only the filer can submit his/her report; a filer's assistant cannot submit a report for a filer. When you are ready to submit your report, click on eSign in the Report Data progress bar to get back to this page. Or, you can click Continue through the report to eSign.

**Report Not Ready for Submission (Report Condition)****How do I get back here to submit my report?**

When you are ready to submit your report, click on eSign in the Report Data progress bar to get back to this page. Or, you can click Continue through the report to eSign.

**What are flags?**

Flags identify missing or incomplete information. Red flags identify required information that must be provided before the report is considered complete for filing (submission).



**How do I review my report's flags?**

To view the flags, click "Continue" on the "Report Not Ready for Submission" page. Or, click on the "Flags" menu item under the "My Reports" tab.

**What happens if I do not file by the required due date?**

You may be subject to appropriate personnel or other action in accordance with applicable law or regulation for failing to file a confidential financial disclosure report, for filing such reports late, or for falsifying or failing to report required information. This may include adverse action under 5 CFR part 752, including suspension, reduction in grade, reduction in pay, etc.

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Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

**eSign Report (Certify Report Contents)****What is the FDM e450?**

The FDM e450 is an electronic version of the OGE Form 450, Confidential Financial Disclosure Report, that OGE has approved for current FDM 450 filers.

**Are there any penalties for an incomplete or false report?**

Falsification of information or failure to file or report information required to be reported may subject you to disciplinary action by your employing agency or other authority. Knowing and willful falsification of information required to be reported may also subject you to criminal prosecution.

**How do I review my report's flags?**

To view the flags, click "Continue" on the "Report Not Ready for Submission" page. Or, click on the "Flags" menu item under the "My Reports" tab.

**Submit Confirmed****Review Filers Reviewer's Wrap Up****What am I determining when reviewing a Filer's financial disclosure report?**

Reviewers are checking the reported financial interests for completeness and to identify those financial interests that may conflict with the Filer's official duties and that the report is administratively accurate and complete. Before signing off on the report the reviewer must take appropriate steps to resolve any apparent conflicts of interest. Contact your ethics counselor or official for assistance.

**Flags****What are flags?**

Flags identify missing or incomplete information. Red flags identify required information that must be provided before the report is considered complete for filing (submission).

**Comments****What is the difference between a comment on a Report and a comment on a line item?**

A comment on a Report is a general comment that does not pertain to a specific line item. Comments on a Report can only be added, viewed, and edited from the Comments page. To get to the Comments page click on "Comments" located in the menu bar. Comments on a line item pertain to a specific line item. Comments on a line item can be added, viewed, and edited from the page that contains the line item.

**What is the OGE 450 of Record?**

The OGE 450 of Record is the official version of the filer's report. The OGE 450 of Record includes the OGE 450 and the attachments and comments that are designated as included in the OGE 450 of Record.

**Comments: Add/Edit****What is the OGE 450 of Record?**

The OGE 450 of Record is the official version of the filer's report. The OGE 450 of Record includes the OGE 450 and the attachments and comments that are designated as included in the OGE 450 of Record.

**When should a comment be part of the OGE 450 of Record?**

A comment should be part of the OGE 450 of Record if it is a substantive comment. A substantive comment provides additional information, a clarification, or a correction that materially affects the data reported on the OGE 450.

## **Attachments List**

### **May I submit my broker's statement instead of entering each stock and mutual fund separately?**

You may submit a broker's statement or other financial report only if it (1) includes all the information required to be reported; (2) covers the appropriate time periods completely; and (3) readily discloses the required information in a clear and concise manner. Consult your ethics official or counselor for assistance in adding a broker statement.

## **Add Attachment**

### **May I submit my broker's statement instead of entering each stock and mutual fund separately?**

You may submit a broker's statement or other financial report only if it (1) includes all the information required to be reported; (2) covers the appropriate time periods completely; and (3) readily discloses the required information in a clear and concise manner. Consult your ethics official or counselor for assistance in adding a broker statement.

## **Audit Trail**

## **View/Print**

### **What is the FDM e450?**

The FDM e450 is an electronic version of the OGE Form 450, Confidential Financial Disclosure Report, that OGE approved for current FDM 450 filers.

### **How do I adjust the appearance of a Web Page when it prints?**

Check your Browser's Help For Printing a Web Page or contact your Local Help Desk for assistance.

## **Review Status:**

### **What is the difference between Review Date and Signature Date?**

Review Date is the date on which a reviewer has completed their review of the report. Signature Date is the date that a reviewer has eSigned (electronically or digitally signed) the report. Signatures will appear on the face of the report, review dates will not. FDM allows more reviewers to review the report than are required to sign it.

### **What is the Amended date and how does it differ from the Submitted Date?**

The Submitted date is the original date of the filer's submission and is tied to the calculation of lateness. The Submitted date will never change. After a report has been submitted, the filer is allowed to amend their report during the initial review up until the time the report is completed. If the filer has amended their report, the Amended date would be displayed.

### **When should an Additional Reviewer be added?**

An Additional Reviewer may be added when someone not in the filer's current FDM organizational review chain needs to review a particular report. For example, where the filer has more than one immediate supervisor an Additional Reviewer may be added. Another example is to add a former supervisor or legal advisor (SLC) at the time of an earlier reporting period covered by a report being prepared later than normal because of a Combat Zone extension.

## Review Filers Reports List

### **What does it mean to "End Initial Review"?**

"End Initial Review:" You can enter the date on which you completed the initial review of the report. Note that an "initial review" means a full review of the report for both technical sufficiency and potential conflicts. Therefore, you do not complete this field if you are reviewing the report as a Supervisor or Screener. Complete this field only if you are performing the initial review for your Agency as an Ethics Official or Certifying Official. Choosing this option does NOT toll the 60-day period after the filer's esignature within which reports are to be certified (5 C.F.R. section 2634.605).

### **What does Amended mean?**

A financial disclosure report that has been changed and eSigned by the filer after the filer has submitted the report. Any financial disclosure report that is Under Review can be amended by the filer. Amending a report voids any eSignatures that were on the report when the filer amended it.

### **What does "Amendment in Progress" mean?**

Once a filer starts the amendment, FDM will automatically prevent others from ending their reviews until the filer has eSigned the amended report. A reviewer may continue to view the report, make comments or view the audit trail during this time.

### **How do I see the reports assigned to me if I have more than one role in FDM?**

You may use the "My Role" drop down box to select a specific role (e.g., 450 Certifier, SLC), change any other Search filters to narrow your display, then click "Go". Alternatively, simply scroll the list of reports and look for the "My Role: \_\_\_\_" title bar in the table list that groups reports based on your different roles.

### **What does "Complete" report status mean?**

Complete in FDM 450 indicates that the 450 Certifier (or a designee) has reviewed and certified the report. Normally this happens after the Filer and Supervisor (if any) have eSigned the report. Once complete the report data remains in FDM for six years.

## **My Reports Reports List**

### **What is the FDM e450?**

The FDM e450 is an electronic version of the OGE Form 450, Confidential Financial Disclosure Report that OGE has approved for current FDM 450 filers.

### **Why must I file this report?**

You have been designated by your agency to file the Confidential Financial Disclosure Report to avoid involvement in a real or apparent conflict of interest. Your agency made this decision based on the duties and responsibilities of your position.

### **How is the information that I report used?**

The purpose of this report is to assist employees and their agencies in avoiding conflicts between official duties and private financial interests or affiliations. Your agency ethics official will use the information that you provide to determine whether any potential conflicts exist.

**Who may see my report?**

The primary person who will be reviewing your report is your agency ethics official. It is possible that a paralegal or an ethics specialist assisting the ethics official in reviewing OGE Form 450s will look at your form. Within the Department of Defense, your Supervisor also will review this report in accordance with the Joint Ethics Regulation. Other agencies may also require the filer's supervisor to review the form and sign it. The Privacy Act Statement lists other limited circumstances and persons who may have access to your report. In general, these reports are filed on a confidential basis and are required to be withheld from the public.

**How is my financial information protected?**

Your financial information is stored in this application and may be viewed by yourself, your supervisor, and the ethics counselors that support you. In addition, application administrators, in the course of administering the application and supporting its users, may view the financial data if necessary to maintain the application. Each application administrator is bound by Army regulation and a nondisclosure agreement to safeguard the information from unauthorized personnel.

**What are the reporting rules for the OGE Form 450?**

Summary: OGE Form 450 Contents & Report Type. As indicated below, a filer must complete different parts of the report covering different time periods depending upon the type of report filed. For Annual reports, the period covered is all of the preceding calendar year.

**Report Part****Part I:**

Assets and Income New Entrant: See below

Annual: Preceding Calendar Year

Report for yourself, your spouse, and dependent child those assets held for investment with a value over \$1,000 at the end of the reporting period (or as of the date of filing if a new entrant filer) OR assets held for investment which if produced over \$1000 in income during the reporting period (or during the preceding 12 months if a new entrant filer) OR any source from which the filer or filer's spouse received more than \$1000 in earned income, honoraria, and other non-investment income during the preceding calendar year (preceding 12 months if a new entrant filer). Examples: These assets include, but are not limited to: stocks, bonds, annuities, trust holdings, partnership interests, life insurance, investment real estate, or a privately-held trade or business; sector mutual funds (those funds invested in a particular industry, business, or location such as ABC Electronics Fund or XYZ Canada Fund (report the full name of the fund, not just the general family fund name)); holdings of retirement plans (e.g., 401(k)s or IRAs (list each holding except for holdings listed below in the "Do not report these assets" section); and defined benefit pension plans provided by a former employer (include the name of the employer). Also filer reports all sources of salary, fees, commissions, and other earned income greater than \$1000, honoraria greater than \$1000, and other non-investment income such as scholarships, prizes, and gambling income greater than \$1000. Filer reports, for his or her spouse, all sources of salary, fees, commissions, and other earned income greater than \$1000 and honoraria greater than \$1000.

Do not report these assets: Federal Government retirement benefits; Thrift Savings Plan; certificates of deposit, savings or checking accounts; term life insurance; money market mutual funds and money market accounts; a personal residence (unless rented); diversified mutual funds (e.g., ABC Equity Value Fund); US Government Treasury bonds, bills, notes, and savings bonds; diversified funds within an employee benefit plan; money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child, dependent child; a dependent child's earned income; Veterans' benefits; Federal Government salary; and Social Security benefits.

**Part II:**

Liabilities New Entrant: See below

Annual: Preceding Calendar Year

Report for yourself, your spouse, and dependent child, any liability that exceeded \$10,000 at the end of the reporting period if you are a new entrant filer, and any liability that exceeded \$10,000 during the reporting period if you are an annual filer.

Do not report: any liability, such as a mortgage, student loan, or a credit card account, from a financial institution or business entity granted on terms available to the general public; loans secured by automobiles, household furniture, or appliances, unless the loan exceeds the purchase price of the item it secures; or liabilities that you owe to your spouse or to the parent, sibling, or child of you, your spouse, or your dependent child.

Part III:

Outside Positions New Entrant: Preceding 12 months

Annual: Preceding calendar year

Report for yourself all positions outside the US Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position.

Position Examples: officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of a corporation, partnership, trust, or other business entity, non-profit or volunteer organization or educational institution, or state or local government.

Do not report: any position with a religious, social, fraternal, or political entity; any position held by your spouse or dependent child, or any position you hold as part of your official duties.

Part IV:

Agreements and Arrangements

New Entrant: Preceding 12 months

Annual: Preceding Calendar Year

Report your agreements and arrangements for continuing participation in an employee pension or benefit plan maintained by a current or former employer; a leave of absence; future employment, including date you accepted employment offer; and continuation of payment by a current or former employer (including severance payments).

Do not report: any agreement or arrangement related to your employment by the Federal Government, spouse's/dependent child's agreements or arrangements, or continuing participation in a defined contribution plan, such as a 401(k) plan, to which an employer is no longer making contributions.

Part V:

Gifts and Travel Reimbursements New Entrants and SGEs: Not applicable

Annual: Preceding Calendar Year

Report for yourself, your spouse, and dependent child any gifts or travel-related reimbursements (e.g., lodging, transportation, and food) totaling more than \$390\* from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip for travel gifts and reimbursements.

\*If you received more than one gift from one source: 1. Determine the value of each item you received from that source. 2. Ignore each item values at \$156 or less. 3. Add the value of those items valued at more than \$156. If the total is more than \$390 then you must report those items.

Do not report: anything received from relatives, the US Government, and DC, state, or local governments; bequests and other forms of inheritance; gifts and travel reimbursements given to your agency in connection with your official travel; gifts of hospitality (e.g., food, lodging, entertainment) at the donor's residence or personal premises; or anything received by your spouse or dependent child totally independent of their relationship to you.

**Is there an extension for service during a period of national emergency or in a combat zone?**

Yes. Consult with your ethics counselor for details.

**How do I request an extension?**

You should consult with your ethics officials or supervisor. Agencies may grant extensions of due dates for both new entrant and annual filers of up to 90 days for good cause (such as extended travel, significant illness, etc.).

**What happens if I do not file by the required due date?**

You may be subject to appropriate personnel or other action in accordance with applicable law or regulation for failing to file a confidential financial disclosure report, for filing such reports late, or for falsifying or failing to report required information. This may include adverse action under 5 CFR part 752, including suspension, reduction in grade, reduction in pay, etc.

**If I have questions about completing my report whom do I contact for assistance?**

The best person to contact is your ethics official or counselor.

**Reports Not Started****Who could advise me if I have questions about the assigned report(s)?**

Contact your Ethics Official if you need more information. In the "Org Unit" column, click on the underlined org unit name and in the row for the "SLC" (DoD) or "DAEO" Role click on the name to see the email address of the assigned Ethics Official for that report.

**What information might help me prepare my report?**

You may find it helpful to have the following information to prepare your report.

A copy of your previous OGE 450 (if you have filed before)

Tax return

Brokerage and/or mutual fund statements

Rental agreements

Any agreements or arrangements from past, current or future employers

Loan statements (if over \$10,000)

**How is the information that I report used?**

The purpose of this report is to assist employees and their agencies in avoiding conflicts between official duties and private financial interests or affiliations. Your agency ethics official will use the information that you provide to determine whether any potential conflicts exist.

**Who may see my report?**

The primary person who will be reviewing your report is your agency ethics official. It is possible that a paralegal or an ethics specialist assisting the ethics official in reviewing OGE Form 450s will look at your form. Within the Department of Defense, your Supervisor also will review this report in accordance with the Joint Ethics Regulation. Other agencies may also require the filer's supervisor to review the form and sign it. The Privacy Act Statement lists other limited circumstances and persons who may have access to your report. In general, these reports are filed on a confidential basis and are required to be withheld from the public.

**How is my financial information protected?**

Your financial information is stored in this application and may be viewed by yourself, your supervisor, and the ethics counselors that support you. In addition, application administrators, in the course of administering the application and supporting its users, may view the financial data if necessary to maintain the application. Each application administrator is bound by Army regulation and a nondisclosure agreement to safeguard the information from unauthorized personnel.