



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

June 15, 2004
DO-04-014

MEMORANDUM

TO: Designated Agency Ethics Officials, General Counsels
and Inspectors General

FROM: Jack Covalleski
Deputy Director for Agency Programs

SUBJECT: Filing Public Financial Disclosure Reports of
Executive Branch Officials with the Office
of Government Ethics

The public financial disclosure report SF 278s of Presidential appointees confirmed by the Senate (PAS) and Designated Agency Ethics Officials (DAEO) must be submitted to this Office for final review and certification. This year we are requiring that these SF 278s be submitted to OGE as soon as approved by your agency or department. This requirement is particularly important for the financial disclosure report of your agency head. As you know, their reports are among the most requested by the news media and public. Submitting these and all other PAS reports right after your review has been completed will make OGE's review and your follow up on any SF 278-related questions timelier.

In the past, OGE requested that all reports requiring little or no follow up be submitted no later than August 1, 2004. In instances where the report could not be approved by the agency and submitted to this Office by August 1, 2004, due to a filing extension, pending resolution of a conflict of interest, or the need for additional information or clarification, agencies were requested to submit the report no later than September 15, 2004. Over the years, OGE has found that this delay in receipt severely affects the timeliness of its review and requires ethics officials to gather additional information from filers on forms that were completed many months earlier. OGE believes that by changing the requirement from one that is date driven to one that is flow driven, these issues should be ameliorated.

Starting July 15, 2004, OGE will follow up monthly with agencies regarding the status of PAS SF 278s reports we have not received. As part of this follow-up, we will gather the following information:

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the names and positions of the officials whose reports have not yet been submitted, the status of the report (extension granted/report not yet due, report not yet received or report under review), and the date you expect to transmit the report to this Office.

If you have any questions, please contact Trish Zemple, Associate Director, Program Services Division, at 202-482-9286 or at pczemple@oge.gov.