



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

COMMISSION DIRECTIVE	PREVIOUS NO.	NO. 56
	RESCINDS: August 14, 2003	EFFECTIVE DATE: April 25, 2011
Procedures to Implement FEC Duties and Responsibilities Under the Ethics in Government Act of 1978, as amended, with Respect to Public and Confidential Financial Disclosure by Commission Employees		

The following are procedures that implement FEC duties and responsibilities under the Ethics in Government Act of 1978, as amended, as it pertains to the filing of public and confidential financial disclosure reports by Commission employees.

I. PUBLIC FILERS

A. Who Shall File

1. General

Unless expressly excluded, each officer or employee in the executive branch, including a special Government employee as defined in 18 U.S.C § 202(a), whose position is classified above GS-15 of the General Schedule prescribed by 5 U.S.C § 5332, or the rate of basic pay for which is fixed, other than under the General Schedule, at a rate equal to or greater than 120% of the minimum rate of basic pay for GS-15 of the General Schedule shall file public financial disclosure reports. 5 C.F.R. § 2634.202 (c).

2. Commission Staff

Any Commission employee who is described in section A.1. above, and who is not specifically excluded by section B below, as a public filer shall file a public financial disclosure report. This list will generally include the following positions:

- a. Commissioners;
- b. Staff Director;
- c. General Counsel;
- d. Deputy Staff Directors;
- e. Deputy General Counsel;
- f. Associate General Counsels;
- g. Chief Financial Officer; and
- h. Inspector General.

3. Nominees

- a. The DAEO or his or her designee shall coordinate with the Office of Government Ethics, the Office of White House Counsel, and the Senate with regard to the public financial disclosure form of any prospective or actual Presidential nominee to the Commission. 5 CFR §§ 2634.605 & 2638.203(b)(3).

B. Exclusions

1. Exclusion by Status

- a. The following individuals may be excluded from filing a report:
 - i. Individuals who have not or are not reasonably expected to perform the duties of a designated filing position for more than 60 days during the filing period. 5 C.F.R. § 2634.204.
 - ii. Individuals who have, within 30 days of assuming the filer position, left another position or office for which a public financial disclosure report was required to be filed. 5 C.F.R. § 2634.201(b)(2)(i). The individual must furnish the report to the Designated Agency Ethics Official (“DAEO”), or his or her designee, and update it if the DAEO determines that it is necessary.
 - iii. Individuals who have already filed such a report as a nominee or candidate for the position. 5 C.F.R. § 2634.201(b)(2)(ii). The individual must furnish the report to the DAEO, or his or her designee, and update it if the DAEO determines that it is necessary.

b. Procedures

Individuals designated as public filers in section I (A) who seek to be excluded from public reporting obligations by the criteria set forth in § I(B)(1)(a)(i) must submit a request with appropriate reasons stated to the DAEO within ten work days after receiving their notification to file. The DAEO will consider the request and make a determination on filer status within ten workdays of receipt of the request. If the DAEO denies the requested exclusion then the individual must file within the regular filing timeframe. See *infra* § I (C).

2. Special Waiver

a. Basis of Determination

In unusual circumstances, the Director of OGE may grant a request for a waiver of the public reporting requirements for an individual who is reasonably expected to perform the duties of an office or position for more than 60, but less than 130 days in a calendar year. 5 C.F.R. § 2634.205(a). The request will only be granted if the following criteria are met:

- i. the individual is a special government employee, as defined in 18 U.S.C. § 202(a), who performs temporary duties either on a full-time or intermittent basis;
- ii. the individual is able to provide services specially needed by the government;
- iii. it is unlikely that the individual's outside employment or financial interests will create a conflict of interest; and public financial disclosure by the individual is not necessary under the circumstances. 5 C.F.R. § 2634.205 (a)(1)-(4).

b. Procedures for a Special Waiver

Individuals who otherwise would be public filers pursuant to Section I(A) who seek a special waiver must submit a request to the DAEO within ten working days after the employee learns that he or she will hold a position which requires reporting and that he or she will serve in that position for more than 60 days in a calendar year or upon serving in such a position for more than 60 days, whichever is earlier. The DAEO will forward the request to the Director of OGE. The request shall consist of:

- i. a cover letter that identifies the individual and his or her position, states the approximate number of days in a calendar year that he or she expects to serve in that position, and requests a waiver of public reporting under this section.
- ii. an enclosure which states the reasons for the individual's belief that the conditions from § (I)(B)(2)(a)(i)-(iv) are met.

- iii. the report otherwise required by those designated as filers. The report shall bear the legend at the top of page 1: "CONFIDENTIAL: WAIVER REQUEST PENDING PURSUANT TO 5 C.F.R. 2634.205." 5 C.F.R. § 2634.205.

C. Filing Procedures for Public Disclosure Reports

1. Incumbents

Public filers must file the report with the DAEO by May 15 of every calendar year. 5 C.F.R. §§ 2634.201(a) and 2634.602.

The DAEO or his or her designee will provide notification of the filing requirement and distribute the public financial disclosure report form (SF 278) to all employees identified as public filers at least 30 days prior to the filing date. See Appendix A. The form may be made available earlier, either upon request of the DAEO or on his or her (or his or her designee's) initiative, in the interest of those persons who may desire more time to compile their records.

2. New Entrants

Individuals who are new entrants to the filer category must file their reports within 30 days of designation as a filer. 5 C.F.R. § 2634.201(b). The DAEO will provide the individual with notification and the report form upon commencement of employment in the position.

3. Extensions

Extensions for filing the reports may be requested in writing to the DAEO or his or her designee. Extensions of the filing period will be granted upon a showing of good cause. The DAEO is authorized to grant an extension not to exceed 45 days. The DAEO is also authorized to grant an additional extension not to exceed 45 days. 5 C.F.R. § 2634.201(f).

4. Custody of Reports

Filed public reports will be kept in a locked file by the DAEO. The reports will remain on file for six years, and after that time, will be destroyed unless they are needed for an ongoing investigation. 5 C.F.R. § 2634.604.

Thirty days after receipt of a report, the DAEO will make the report available to the public pursuant to a valid request. 5 C.F.R. § 2634.603(c). A valid request is one for which the requester has completed OGE Form 201. See Appendix B. If a request is not made on OGE Form 201, the requester will be provided with a copy of the form and asked to complete it. The FEC may charge a reasonable fee, established by agency regulation, to recover the direct cost of reproduction and mailing of a report.

FEC staff whose duty it is to review the reports to ensure compliance with applicable regulations, Federal Bureau of Investigation investigators

who are engaging in a criminal inquiry into potential conflicts of interest and OGE staff all shall have access to the reports without the Form 201 request.

5. Review of Reports

a. Initial Review

The DAEO will review the public reports within 60 days of receipt of the report. The Chair of the Commission will review the DAEO's report. The initial review of every report must determine whether:

- i. every portion of the report was answered;
- ii. any apparent conflicts of interest exist; and
- iii. the filer's interest or position discloses any apparent violation of ethics regulations. 5 C.F.R. § 2634.605(b)(1).¹

b. Further Review

If the initial review indicates that additional information is needed to clarify or complete certain entries in the report, the DAEO or his or her designee will request the information from the reporting individual. The subsequently received information will then become part of the report. If the DAEO determines that a possible violation or conflict exists, he or she may request further information from the filer to investigate this possibility. 5 C.F.R. § 2634.605(b)(3).

c. Certification of the Reports

If the DAEO determines that the report contains no apparent violation of the law, the DAEO will certify the report by signature and date. 5 C.F.R. § 2634.605(b)(2).

d. OGE Review

Following certification, the reports received from Commissioners and the DAEO will be forwarded to OGE. 5 C.F.R. § 2634.605.

6. Corrective Actions for Resolution of Conflicts or Violations

a. Procedures

In the event a report does not comply with applicable laws and regulations or the DAEO's review reveals a conflicting interest, the following actions will be taken:

¹ These regulations include: (1) any applicable provision of Chapter 11 of Title 18, U.S.C.; (2) The Ethics in Government Act of 1978, as amended and the implementing regulations; (3) Executive Order 12674, as modified by Executive Order 12731 and the implementing regulations; or (4) the Federal Election Campaign Act of 1971, as amended, or Commission regulations which govern the filer.

- i. the DAEO will notify the reporting individual in writing of the preliminary determination,
- ii. the filer will be given a reasonable opportunity to file a response,
- iii. the DAEO will then determine whether the report is non-compliant after a review of all available materials, including consultation with the employee's supervisor (where applicable) and OGE staff,
- iv. the filer will then be notified of the conclusion,
- v. the filer will be given an opportunity for personal consultation,
- vi. the DAEO will determine what corrective actions should be taken,
- vii. the DAEO will notify the filer of the corrective actions to be taken and time allotted for completing the corrective actions.

b. Available Corrective Actions

The following corrective actions are available:

- i. divestiture of a conflicting interest;
- ii. resignation from the non-federal entity that presents the conflict;
- iii. restitution;
- iv. establishment of a qualified blind or diversified trust;
- v. procurement of a waiver;
- vi. recusal from any particular matter or particular matter involving specific parties that presents a conflict; and
- vii. voluntary request for reassignment or limitation of duties. 5 C.F.R. § 2634.605(b)(5).

Except in unusual circumstances, corrective actions must be completed not later than three months from the date when the filer received notice that the action is required. *Id.*

7. Late Filing Fee

Any reporting individual who is required to file a public financial disclosure report shall remit a late filing fee of \$200 to the Commission, made payable to the United States Treasury, if such report is filed more than thirty (30) days after the later of:

- a. The date such report was required to be filed; or
- b. The last filing day of any filing extension period granted.

The DAEO may waive the late filing fee if he or she determines that the delay in filing was caused by extraordinary circumstances which made the delay reasonably necessary. Any request for a waiver of this filing fee provision must be made in writing and submitted with supporting documentation to the DAEO. The DAEO may consult with OGE prior to approving any waiver of the late filing fee. 5 C.F.R. § 2634.704(b).

The late filing fee supplements other sanctions which may be imposed for late filing (i.e., referral of cases to OGE, civil action, criminal action for supplying false information, and administrative remedies). See 5 C.F.R. § 2634.701. The late filing fee does not apply to confidential filers. 5 C.F.R. § 2634.704(e).

8. Failure to File and Falsified Reports

The DAEO will determine the names of individuals who have willfully failed to file a report or information necessary for a complete report or who have willfully filed false information, and will forward those names to the Commission with a recommendation for referral to the Attorney General. The Commission shall refer to the Attorney General the name of any individual when there is reasonable cause to believe the individual has willfully failed to file a public report or information required for the report, or has willfully falsified any information in the report. See 5 C.F.R. § 2634.701.

The Commission may take appropriate administrative action against any individual for failing to file a report, filing such a report late, or for falsifying or failing to report required information.

The Attorney General may pursue appropriate civil or criminal remedies.
Id.

D. Specific Responsibilities

The following shall constitute the various responsibilities of each FEC office pursuant to 5 C.F.R. § 2634 with respect to public financial disclosure reports.

The DAEO or his or her designee shall:

1. Determine, pursuant to 5 C.F.R. part 2634 and the provisions of this directive, which employees or positions are required to file public financial disclosure reports.
2. Notify all those employees designated as public filers of their responsibility to file a public financial disclosure report not later than 30 days prior to the date on which such report is due. For annual filers, the notification shall be made not later than April 15. As a part of the notification process, the DAEO or his or her designee will send a memorandum to each affected employee, with a SF 278 attached, informing them of their obligation to file a public financial disclosure report. This memorandum and attachment may be sent electronically.
3. Review, and make the appropriate determination, regarding all requests for extensions of time to file public financial disclosure reports and requests for waivers or exclusion from the filer category.
4. Maintain a record of the due dates for all public filers, along with the new filing dates under extensions which have been granted.
5. Upon receipt of the filed reports, mark each report received with the date of receipt.

6. Maintain custody of the reports in a file specifically designated for public financial disclosure reports.
7. Review the public reports within 60 days for actual or apparent conflicts of interest. Based upon this review, the DAEO shall either certify that the report contains no apparent violations, or, in the event an apparent violation has occurred, initiate corrective action pursuant to 5 C.F.R. § 2634.605(b)(5). If the initial review indicates that additional information is necessary, the DAEO or his or her designee will inform the filer of the need for the information and set a date for receipt of the information.
8. Advise filers, in writing, who have failed to file their reports within the time specified that:
 - a. If the financial disclosure report is more than 30 days overdue, a \$200 late filing fee will become due at the time of filing;
 - b. The filer is directed to remit to the Commission, with the completed report, the \$200 fee, payable to the United States Treasury;
 - c. If the filer fails to remit the \$200 fee when filing the late report, it shall be subject to Commission debt collection procedures; and
 - d. If extraordinary circumstances exist that would justify a request for a fee waiver, such request and supporting documentation must be submitted immediately.
9. Upon receipt from the reporting individual of the \$200 late filing fee, note the payment in his or her records, and shall forward the money to the Office of the Chief Financial Officer. If payment is not forthcoming, Commission debt collection procedures shall be utilized pursuant to 11 C.F.R. Part 8.
10. Provide the Office of Government Ethics with copies of reports received from Commissioners and the DAEO prior to July 29 for filers not receiving any extensions, prior to September 12 for those filers receiving one extension, and prior to October 28, for filers receiving two extensions.
11. Provide the Commission with the names of those who willfully failed to file a report or information necessary for the completion of the report, and of those who willfully filed false information, with a recommendation for referral to the Attorney General.
12. Notify the Director of OGE of referrals to the Attorney General.

The Office of Human Resources shall:

1. Provide a copy of the biweekly Staffing Report to the DAEO or his or her designee.

2. Provide the DAEO or his or her designee with notice when public filers end their employment with the agency. This notice should be provided as soon as possible, and in no case later than ten days after the employee's date of departure.
3. Insert a notice in job announcements for positions that have been previously designated as public filer positions that the position is a public filer position.

The Office of the Chief Financial Officer shall:

1. In coordination with the Office of General Counsel, collect any late fees and other fines assessed against filers.
2. Forward all collected funds to the United States Treasury.
3. Employ Commission debt collection procedures in the event that a fined individual has not paid the fine within an appropriate time frame.

II. CONFIDENTIAL FILERS

A. Who Shall File

The following persons shall file confidential financial disclosure reports:

1. Any officer or employee whose position is classified at GS-15 or lower if the employee participates personally and substantially through decision or exercise of judgment without substantial supervision in Government action concerning:
 - contracting and procurement; or
 - administering or monitoring grants, subsidies, licenses, or other federally conferred financial or operational benefits; or
 - regulating or auditing any non-federal entity; or
 - other activities in which the final decision or action will have a direct and substantial economic effect on the interests of any non-federal entity.

5 C.F.R. § 2634.904(a).

2. Any employee at GS-15 or lower if the employee's duties or responsibilities require the employee to file such a report to avoid involvement in a real or apparent conflict of interest. Id.
3. All special Government employees (as defined by 18 U.S.C. § 202(a) and 5 C.F.R. § 2634.105), including those on advisory committees, unless they are required to file public disclosure reports. 5 C.F.R. § 2634.904(b).
4. Any other employees who have been designated by the Commission as confidential filers.

As of the effective date of this directive as most recently revised, the positions covered by these criteria include:

- a. Director of Congressional Affairs;
- b. Director of Human Resources;
- c. Press Officer;
- d. Budget Officer;
- e. EEO Director;
- f. Administrative Services Manager;
- g. Assistant Staff Directors; ;
- h. Deputy Assistant Staff Directors;
- i. Audit Managers;
- j. Supervisory Information Technology Specialists;
- k. Data Coding Branch Manager;
- l. Special Counsel;
- m. Library Director;
- n. Assistant General Counsels;
- o. Executive Assistants;
- p. Legal Information Systems Manager;
- q. Director of Alternative Dispute Resolution;
- r. Reviewing Officer;
- s. Contracting Officer; and
- t. Any other office or position designated by the DAEO in accordance with § II(C)(1) (DAEO section).

B. Exclusions

1. General

An individual designated as a confidential filer may challenge the agency's determination of his or her filing designation by following the procedures below.

2. Procedures to Challenge Filer Designation

Individuals designated as confidential filers in section II(A) who seek to be excluded from confidential reporting obligations must submit a request with the appropriate reasons stated to the DAEO within ten workdays of receiving their confidential reporting form. The DAEO will review the request and submit it along with a recommendation to the Commission within ten work days of receipt of the request. The Commission shall consider the request and make a determination on filer status within ten work days of receipt of the request. If the Commission denies the requested exclusion then the individual must file within the regular filing timeframe. See *infra* II(C)(2). If the Commission approves the request, the individual does not have to file. The decision of the Commission shall be final. See 5 C.F.R. § 2634.906.

3. Basis for Exclusion Determination

An individual may be excluded from the confidential reporting requirement when:

- a. the possibility of a real or apparent conflict of interest is remote;
or
- b. the duties of a position involve such a low level of responsibility that the submission of a confidential financial disclosure report is unnecessary because of:
 - i. the substantial degree of supervision and review over the position; or
 - ii. the inconsequential effect of any potential conflict on the integrity of the Government. 5 C.F.R. § 2634.905;or
- c. the individual has not or is not reasonably expected to perform the duties of the filer position for more than sixty (60) days during the filing period; or
- d. the individual is a new entrant to a filing position who previously filed a report as required by a previously held position. The individual must see that the report is forwarded to the DAEO and must update it if the DAEO determines it is necessary; or
- e. the individual is a new entrant who previously filed a report as a prerequisite for applying to the position. The individual must update the report if the DAEO determines it is necessary.

C. Confidential Filing Procedures

1. Incumbents

- a. The DAEO or his or her designee will provide notification of the obligation to file and distribute the confidential financial disclosure report form (OGE Form 450) to all employees identified as confidential filers at least 30 days prior to the filing date. See Appendix C. The form may be made available earlier, either upon request of the DAEO or on his or her (or his or her designee's) initiative, in the interest of those persons who may desire more time to compile their records.
- b. Confidential filers must file the report with the DAEO prior to or on February 15 of the calendar year. 5 C.F.R. § 2634.602; § 2634.903(a).

2. New Entrants

Persons who are new entrants to the filer category must file their report within thirty days of designation as a filer. 5 C.F.R. § 2634.903(b). The DAEO will provide the individual with a report form upon commencement of employment in the position.

3. Extensions

Extensions for filing the reports may be requested in writing to the DAEO. Extensions for the filing period will be granted upon a showing of good cause. Filers may request extensions of up to ninety days. 5 C.F.R. § 2634.903(d)(1).

The DAEO may request that the Commission create blanket extensions in the case where there is a foreseeable agency-wide need to extend the filing period because of other agency deadlines or logistical problems. See DAEO-gram (Sept. 3, 1992) & 5 C.F.R. § 2634.903(d)(1). Employees may suggest to the DAEO when such an extension request would be appropriate by submitting a written recommendation to the DAEO.

4. Custody of Reports

Filed confidential reports will be kept in a locked file by the DAEO. The reports will remain on file for six years, and after that will be destroyed unless they are needed for an ongoing investigation. 5 C.F.R. § 2634.604. Confidential reports are not available to the public absent court order or as otherwise permitted under the Privacy Act. 5 C.F.R. § 2634.604(b). The confidential reports are not subject to release under the Freedom of Information Act ("FOIA").

FEC staff whose duty it is to review the reports to ensure compliance with applicable regulations shall have access to the reports.

5. Review of Reports

The DAEO or his or her designee will review the reports within 60 days of receipt of the report. 5 C.F.R. § 2634.605. The initial review of every report must determine: (1) if every portion of the report was answered; (2) if any apparent conflicts of interest exist; and (3) whether the filer's interest or position discloses any apparent violation of ethics regulations. 5 C.F.R. § 2634.605(b)(1).²

If the initial review indicates that additional information is needed to clarify or complete certain entries in the report, the DAEO or his or her designee will request the information from the reporting individual and will state by what date it must be furnished to the DAEO. The subsequently received information will become part of the report. If the DAEO or his or her designee determines that a possible violation or conflict exists, he or she may request further information from the filer to investigate the possibility. 5 C.F.R. § 2634.605(b)(3).

6. Certification of Reports

If the DAEO or his or her designee determines that the report meets requirements, he or she will certify it by signature and date. 5 C.F.R. § 2634.605(b)(2).

² These regulations include: (1) any applicable provision of Chapter 11 of Title 18, U.S.C.; (2) The Ethics in Government Act of 1978, as amended and the implementing regulations; (3) Executive Order 12674, as modified by Executive Order 12731 and the implementing regulations; or (4) the Federal Election Campaign Act of 1971, as amended, or Commission regulations which governs the filer.

7. Corrective Actions for Resolution of Conflicts or Violations

a. Procedures

In the event a report does not comply with applicable laws and regulations or review by the DAEO or his or her designee reveals a conflicting interest, the following actions will be taken:

- i. the DAEO or his or her designee will notify the reporting individual in writing of the preliminary determination,
- ii. the filer will be given a reasonable opportunity to file a response,
- iii. the DAEO or his or her designee will determine whether the report is non-compliant after a review of all available materials, including consultation with the employee's supervisor and OGE advisors,
- iv. the filer will then be notified of the conclusion,
- v. the filer will be given an opportunity for personal consultation,
- vi. the DAEO or his or her designee will determine what corrective actions should be taken,
- vii. the DAEO or his or her designee will notify the filer of the corrective actions to be taken and time allotted for completing the corrective actions.

b. Available Corrective Actions

The following corrective actions are available:

- i. divestiture of a conflicting interest;
- ii. resignation from the non-federal entity that presents the conflict;
- iii. restitution;
- iv. establishment of a qualified blind or diversified trust;
- v. procurement of a waiver;
- vi. recusal from the case that presents a conflict; and
- vii. voluntary request for reassignment or limitation of duties. 5 C.F.R. § 2634.605(b)(5).

Except in unusual circumstances, corrective actions must be completed not later than three months from the date on which the filer received notice that the action is required. *Id.*

8. Late Filers and Failure to File

The DAEO will determine the names of individuals who have filed their reports more than 30 days late or who have willfully failed to file a report or information necessary for the completion of the report and will forward those names to the Commission along with a recommendation for the appropriate administrative remedy. See 5 C.F.R. §§ 2634.701(d) and 704(e).

9. Falsified Reports

The DAEO will determine the names of individuals who have willfully filed false information and shall forward those names to the Commission with a recommendation for referral to the Attorney General. The Commission shall refer the name of any individual when there is reasonable cause to believe the individual has willfully filed false information in the confidential report. See 5 C.F.R. § 2634.701. The Commission may take the appropriate administrative or personnel action against any individual for filing false information in the confidential report.

The Attorney General may pursue the appropriate civil or criminal remedy upon receipt of the referral. *Id.*

D. Specific Responsibilities

The specific responsibilities of the various FEC offices with respect to confidential financial disclosure reports follows.

The DAEO or his or her designee shall:

1. Determine, before January 15, in coordination with the Office of Human Resources, the offices or positions that require the filing of confidential financial disclosure reports. The DAEO may modify the list from year to year as necessary to reflect the regulatory requirements. The DAEO will advise the Office of Human Resources of any determination to include a bargaining unit position within the coverage of this Directive.
2. Notify those individuals identified as confidential filers of the obligation to file thirty days prior to February 15. The notification will include the confidential financial reporting form OGE Form 450. This notification and OGE Form 450 may be provided electronically.
3. Grant extensions of time to file when appropriate.
4. Maintain custody of the confidential reports in one central location specifically designated for confidential reports. To ensure that the reports remain confidential, the DAEO will maintain the files in a secured area (i.e., locked file cabinet which is located in a secured room). Only those individuals specifically designated by the DAEO, for the purposes of reviewing and certifying the reports, will have access to the confidential files. Those persons shall be limited to DAEO, the Alternate DAEO, and their designees.
5. Review the reports for compliance with 5 C.F.R. part 2634 within sixty days from the date the reports were filed.
6. Certify that the report meets the requirements set forth at 5 C.F.R. part 2634.
7. Invoke corrective action in the event that a violation is discovered.

8. Provide the Commission the names of individuals who filed late reports or who willfully failed to file a report or information necessary for the completion of the report, with a recommendation for the appropriate remedy.
9. Provide the Commission the names of individuals who willfully filed false information, and recommend referral to the Attorney General.
10. Notify the Director of OGE of referrals to the Attorney General.

The Office of Human Resources shall:

1. Provide a copy of the biweekly Staffing Report to the DAEO or his or her designee.
2. Provide the DAEO or his or her designee with notice of new employees and/or newly created positions which may require the filing of a confidential financial disclosure report within ten days from the person's official starting date.
3. Provide the DAEO or his or her designee with notice of employees who were designated filers who end their employment with the agency as soon as possible, but not later than ten days after the employee's date of departure.
4. Insert a notice in job announcements for positions that have been previously designated as public or confidential filer positions that the position is a filer position.

This Directive was revised and adopted on April 25, 2011.



D. Alec Palmer
Acting Staff Director

6/1/11

Date

Appendix A -- Public Financial Disclosure Form (SF 278)

Appendix B -- Public Financial Disclosure Report Access Form (OGE Form 201)

Appendix C -- Confidential Financial Disclosure Form (OGE Form 450)