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Government

Ethics Newsgram

Director's Column

In the two decades that have passed since the enactment of the Ethics in Government Act of 1978, we have seen the substantial growth and development of the executive branch ethics program. We should all share credit for the many accomplishments over the past 20 years. At the same time, we should continue to invest in and improve our program in order to meet the challenges of the 21st century.

Many of these future challenges are already with us today. The growth of partnerships and cooperative arrangements between government and the private sector has already presented thorny questions of independence and impartiality, of the proper role of government employees, and of understanding where the line between public and private interests must be drawn. Privatization and reinvention have been with us for some time now. We can expect these initiatives to continue to present tough questions in the future. In addition, downsizing and lean budgets will continue to challenge us to maintain and improve program quality within financial constraints.

As an ethics community, we do have resources that we can draw on to deal successfully with these challenges. There is a substantial body of experience that we can share with one another, experience in administering our program, experience in making financial disclosure systems work more efficiently, and experience in conducting more effective ethics training.

Ethics must be understood as something integral to the way an agency does business and not as an overhead expense.

We do this now by publicizing our "best practices" on the Internet, by sharing experience and expertise at our annual conference, and by regularly exchanging information at interagency group meetings. Not only can we continue to build on these activities within government, but we can also reach out to the private sector to expand the base of our experience. We can learn from the "best practices" of corporations, especially from their efforts to establish an ethical corporate culture. Although some of the improvements we make may be small, the accumulated effect can be tremendously beneficial for our ethics program.

We can also build on our current use of technology to support our program. This should be of particular use in training, in financial disclosure, and in communication

throughout the ethics community. While there may be technical hurdles that will need to be overcome, the investment we make in technological improvement should be repaid many times over.

Of course, we will need adequate financial resources to run our programs. We can help ensure that our individual agency ethics programs have sufficient resources by clearly articulating the importance of that program to the mission of the agency. Ethics must be understood as something integral to the way an agency does business and not as an overhead expense. An effective ethics program contributes to agency efficiency and effectiveness. A sound program means not simply that agency resources and leadership will not be consumed in correcting ethical problems but that a better decision-making process will take place. In this regard, it is absolutely key that agency heads demonstrate both personal commitment to, and agency financial support of, the ethics program.

If we show the commitment and leadership, if we cultivate innovation in our thinking, and if we build on our common experience, then I believe that we will see an even better ethics program in the future. We will see a program in which ethics is based on core values so that ethical principles infuse an agency's culture. We will see a program that is managed by a corps of ethics practitioners of an even higher professional caliber with even deeper experience and more comprehensive knowledge. We will see a program that is more user-friendly, more understandable, and more responsive to employees. We will see a program that is better able to measure its performance. Finally, we will see a program that will deservedly continue to be looked upon as a model by other nations throughout the world.

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Practical Guidance for Schedule C Filing Exclusions

Are you aware that all Schedule C employees are required to file Public Financial Disclosure Reports (SF 278), regardless of their position or grade? Did you know that OGE can grant exclusions from filing SF 278s for positions that meet certain criteria?

Schedule C positions are Federal positions that are excluded from the Federal Government's competitive employment system and are of a confidential or policy-making character. While 5 C.F.R. § 2634.202(e) mandates that all Schedule C employees file SF 278s, this regulation also allows the Director of OGE to exclude a Schedule C position from the SF 278 reporting requirement if he determines that the exclusion would not adversely affect the integrity of the Government or the public's confidence in the integrity of the Government. See 5 C.F.R. § 2634.203.

In order to qualify for an exclusion, the position must meet certain criteria. It must be classified at, or below, level 15 of the General Schedule, or in other pay schedules at a rate of basic pay which is less

than 120% of the minimum rate of basic pay fixed for GS-15. In addition, the position must have no policy-making or advising role with respect to agency programs.

When requesting an exclusion from OGE, agency ethics officials should provide a written request to the Director of OGE which includes the position title and grade and the incumbent's name. The agency should also submit a copy of the position description.

The exclusion of an employee from the reporting requirements is effective as of the time the agency files its request with OGE. Thereafter, the exclusion applies to all employees who fill that position unless and until the duties of that position change.

Agencies can submit a request to OGE for an exclusion at any time. However, if an agency hopes to avoid requiring that an employee submit an upcoming report, the ethics official should request the exclusion prior to the report's due date. If OGE determines that a position has been

improperly excluded, it will advise the agency and set a date for filing of the incumbent's report. Although Schedule C employees may be excluded from the SF 278 reporting requirements, they may still be required to file OGE Form 450 if they meet the filing criteria specified in 5 C.F.R. § 2634.904.

Government Ethics Newsgram

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We welcome any news and information related to Government ethics that you wish to bring to the attention of OGE and the executive agencies as well as your candid critiques and suggestions. Quoting or reprinting materials contained in this publication is strongly encouraged and may be done without seeking OGE permission.

The Director of the Office of Government Ethics has determined that the publication of this periodical is necessary to the transaction of the public business of OGE, as required by law.

1998 Annual Ethics Conference

The 1998 Annual Government Ethics Conference is scheduled for September 14-17, 1998, at the Williamsburg Marriott Hotel in Williamsburg, Virginia. The two and a half-day conference will begin with check-in on Monday evening, September 14. That evening, an informal reception will be held for all attendees. The formal program will begin on Tuesday morning, September 15, and continue through noon on Thursday, September 17.

Some highlights of this year's conference will include marking the 20th Anniversary of the Ethics in Government Act; a plenary session with all former OGE Directors; and new ethics training workshops.

An official conference announcement was sent to all Designated Agency Ethics Officials (DAEO) in March which provided relevant details and conference registration forms. The registration deadline for the conference was Friday, July 10.

Additional conference information can be obtained from the OGE Web site at <http://www.usoge.gov>, under "What's New in Ethics," or you can contact Sheila Powers, OGE Conference Coordinator, at 202-208-8000, ext. 1104.



Redesigning an Ethics Program in Lean Times

While OGE's Program Review Division identified a number of exemplary ethics programs in 1997, it also issued more Notices of Deficiency in a calendar year than had been issued since the regulation implementing OGE's corrective action authority was published in 1990. OGE found that the same factors—the availability and allocation of resources—affect both solid and weak programs. The availability of resources is dependent upon funding while the allocation of those resources is contingent upon planning. In an era of downsizing, making optimal and innovative use of existing resources and redesigning processes and procedures will enable agencies to meet the goal of administering an effective ethics program.

The following suggestions and insights are offered to ethics officials who are focusing on streamlining and improving their existing ethics programs. Keep in mind that the list is not exhaustive and that all of the suggestions will not necessarily be appropriate for a particular agency's ethics program.

Division of Labor

✓ Determine the specific skills necessary to perform each function within the ethics program, and ensure that employees are assigned the most suitable tasks. An attorney or experienced ethics official may most effectively provide ethics advice, while an administrative assistant may best maintain a data base. A personnel division official may be best equipped to identify new entrant filers, while the initial review of financial disclosure reports may most effectively be conducted by filers' supervisors.

Structure

✓ Develop an ethics program structure with ethics officials' responsibilities clearly delineated to prevent employees from "shopping for answers" and to promote good communication and coordination within the ethics program. Consider the costs and benefits of running a centralized or a decentralized program. For decentralized programs, maintaining a strong core

program with sufficient control over the decentralized parts is essential.

Communication

✓ Develop strong lines of communication throughout your ethics program, updating ethics officials on changes to ethics laws, regulations, and policies and making them aware of available ethics training opportunities and resources. Provide a forum, such as "round table" discussions, for ethics officials to voice suggestions and ask questions openly and routinely.

Technology

✓ Take advantage of technology available to you. Internet, intranet, e-mail, and teleconferencing have revolutionized communication. E-mail is an efficient means of disseminating ethics educational materials, announcing ethics training courses, following up with filers during the financial disclosure review process, and for communicating and coordinating actions within the ethics program. Several agencies, including OGE, have developed ethics Web sites. Some of the sites provide e-mail links to ethics officials while others provide guidance on ethics matters and access to ethics training materials, including the capability to download the OGE Form 450 and SF 278. OGE's Web site address is www.usoge.gov.

Organization

✓ Systematize your ethics program functions in a written document, so that the next step is clear and the program is less

vulnerable to staff changes. Such a document should address the updating of master lists throughout the year and prior to financial disclosure filing cycles; the creation of an effective financial disclosure filing system with cross-referencing, as appropriate, so that one individual's report may be easily located along with follow-up advice provided to that individual; tracking the receipt of ethics training; and monitoring the acceptance of travel from non-Federal sources.

Training

✓ Ensure that all ethics officials are adequately trained and kept abreast of ethics-related matters. Make resources available to them, such as OGE financial disclosure review guides, financial references, ethics training, and the Internet.

Ethics Regulations

✓ Review the confidential financial disclosure regulations at 5 C.F.R. §§ 2634.904 and 2634.905 to ensure that only those employees who meet the filing criteria are identified as filers. Examine OGE's training regulation at 5 C.F.R. § 2638.704 to determine whether its flexibility may benefit your "covered" employees. For example, for certain employees, ethics training may be most effectively accomplished using a computer-based training module or by disseminating written materials. However, take note of the increased emphasis in the regulation on tracking.

Resources

✓ Use available resources. OGE provides a range of services and materials to the ethics community. Training courses are offered throughout the country during the year. The Ethics Information Center at OGE houses ethics materials from other agencies as well as those OGE has developed. These include ethics publications and pamphlets, ethics training videos, and computer-based training modules. Finally, consult your agency's OGE desk officer to answer questions about ethics issues and administering your ethics program.

Be Our Guest

OGE wishes to inform readers that the Government Ethics Newsgram is open to submissions of ethics-related articles. If you are interested in submitting an article for consideration, please contact the Editor at 202-208-8000, ext. 1188.

PRD Year-End Summary

The year-end summary of Program Review Division's (PRD) accomplishments for 1997 produced a number of interesting findings about the effectiveness of agency ethics programs. Overall, the summary indicates that a growing number of agencies have developed stronger ethics programs. This positive trend, however, is offset by a record number of Notices of Deficiency issued, indicating a sharp decline among some agency programs.

A total of 44 program review reports were issued in 1997. Of those, 23 reports, nearly half, had no recommendations. In the previous two years, the number of reports without recommendations amounted to only a third of all reports issued.

While the number of reports with recommendations decreased, for those reports with recommendations, the average number per report rose to 4.6 from 3.2 last year. In total, 98 recommendations were issued in 1997 compared to 90 in 1996.

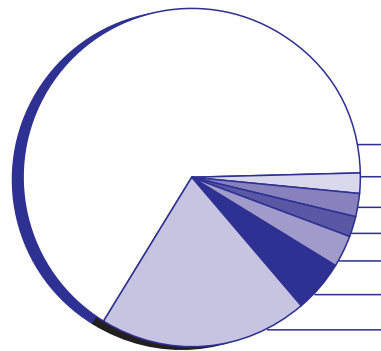
The discrepancy between these trends is partly explained by five Notices of Deficiency issued in 1997. For example, one agency received a Notice of Deficiency with 16 recommendations. The five Notices of Deficiency for 1997 surpassed the total of all such notices issued by OGE since the regulation implementing its corrective action authority was published in 1990.

Financial disclosure warranted the largest number of recommendations, followed by ethics training. These two areas amounted to 85% of all recommendations issued. The most common problem in the area of financial disclosure involved timeliness of filing and collection of reports. Forty percent of all recommendations concerning financial disclosure fell in this category. Other problem areas in the financial disclosure category included review and certification of reports, totaling 17% of the recommendations, and tracking systems, totaling 11% of the recommendations.

Fewer follow-up reviews were conducted in 1997 than in 1996. While 43 follow-up reviews were conducted in 1996, only 30 were conducted in 1997. At the end of 1997, seven follow-up reports had recommendations yet to be closed, two fewer than in 1996. In summary, the increasing

number of agencies demonstrating compliance with OGE guidelines represents a positive development in the ethics community. The data indicates that a significant number of agencies have developed stronger ethics programs within the last year, as shown by the increased number of reports issued without recommendations.

On the other hand, the increase in the number of recommendations issued per report and the record number of deficiency notices indicate that agencies with problems have more serious problems than in years past. OGE is committed to helping such agencies identify the roots of these problems and make the changes necessary in order to bring them into full compliance with their statutory responsibilities.



Recommendations Issued in 1997

Financial Disclosure 66%
Miscellaneous 2%
Travel Acceptances 2%
Outside Activities/Employment 2%
Counseling & Advice 3%
Supplemental Regulations 5%
Ethics Training 20%

OGE Publication Announcements

Informal Advisory Letters

OGE recently published its informal advisory letters that were issued during calendar year 1996. In addition to these opinions, the new materials include an updated index covering guidance issued from 1990 through 1996. The 1996 opinions and updated index may be purchased through the Superintendent of Documents or at the Government Printing Office's bookstores. The opinions may be viewed and downloaded from the OGE Web site at <http://www.usoge.gov/opinions/opinlib.html>. The OGE Web site also has on-line search capability for the opinions which are located at <http://www.usoge.gov/usoge006.html>.

Gifts Pamphlets

OGE has recently produced two pamphlets—"Gifts Between Employees" and "Gifts from Outside Sources" for agency use. Each pamphlet uses scenarios that frequently arise in the workplace to provide a brief overview of the gift rules in a conversational, question-and-answer format. These pamphlets are in Adobe Acrobat PDF file format on the OGE Web site at <http://www.usoge.gov>. If you would like a camera-ready copy of the pamphlets, contact Sonya Hall at 202-208-8000, ext. 1138.

Revised Standards Booklet

OGE is pleased to announce the publication of **The Standards of Ethical Conduct for Employees of the Executive Branch**, Revised as of September 17, 1997. This easy-to-read version of 5 C.F.R. part 2635 may be downloaded from OGE's Web site at <http://www.usoge.gov>. The booklet is also available through GPO, Superintendent of Documents' order line, 202-512-1800. The stock number is 052-003-01470-0, and the cost is \$7.00. Agencies that purchased the booklet riding OGE's order in May should have already received their copies.

Ethics in Action

Q: Richard is a GS-14 attorney at a National Labor Relations Board (NLRB) field office in Peoria, Illinois. Richard and his staff have been assigned to work on an unfair labor practice claim involving Gee-Whiz Corporation with whom Richard is currently negotiating for employment. Richard informs the regional director of his conflict, recuses himself from participation in the matter, and informs his staff that they are not to discuss the case with him. Several weeks later, Richard is offered and accepts a position with Gee-Whiz.

Can Richard now represent Gee-Whiz before the NLRB in the unfair labor practice claim?

A: No. Under 18 U.S.C. § 207(a)(2), for two years after his Government service terminates, Richard may not make, with the intent to influence, any communication to or appearance before an employee of the United States on behalf of another person (except the United States) in connection with a particular matter involving a specific party or parties, in which the United States is a party or has a direct and substantial interest, and which he knows or reasonably should know was pending under his official responsibility within a one-year

period prior to the termination of his employment with the United States.

In this case, the matter (the unfair labor practice claim) is a particular matter involving specific parties in which the United States has a direct and substantial interest, and it was actually pending under Richard's official responsibility during the last year prior to his termination from Government service. "Official responsibility" is defined in 18 U.S.C. § 202 as "the direct administrative or operating authority, whether intermediate or final, and either exercisable alone or with others, and either personally or through subordinates, to approve, disapprove, or otherwise direct Government action." As discussed in the OGE summary on post employment, dated November 4, 1992, "an employee's recusal from or other non-participation in a matter does not remove it from his official responsibility." "A matter was 'actually pending' under a former employee's official responsibility if the matter was in fact referred to or under consideration by persons within the employee's area of responsibility." Richard's staff was responsible for processing that claim, and therefore, the matter was actually pending under Richard's official responsibility.

Q & A

Ethics News Briefs

OGE Clarifies its Original Regulatory Intent as to 5 C.F.R. § 2634.906

OGE has published a final rule amendment of the executive branchwide financial disclosure regulation at 5 C.F.R. § 2634.906 to clarify its original regulatory intent that the review provided for therein by an agency head (or designee) is final for all purposes regarding employee complaints about designation of positions for confidential financial disclosure reporting, and that it constitutes the sole and exclusive means of such review. See 63 Federal Register 15273-15274 (March 31, 1998).

OGE Updates its Equal Access to Justice Act Rules

OGE has updated its internal administrative Equal Access to Justice Act rules, primarily to reflect certain changes to that statute. See 63 Federal Register 13115-13116 (March 18, 1998).

First Round Paperwork Notice for Updated Qualified Trust Model Certificates and Draft Documents

OGE has published an initial notice of its forthcoming request to the Office of Management and Budget for proposed renewal and clearance for an additional three years under the Paperwork Reduction Act for a total of twelve Ethics in Government Act updated model qualified blind and diversified trust certificates and draft documents. See 63 Federal Register 20411-20412 (April 24, 1998).

OGE's Latest Semiannual Regulatory Agenda Published

The most recent OGE semiannual regulatory agenda was published as part of the Spring 1998 executive branch Unified Agenda of Federal Regulatory and Deregulatory Actions. See 63 Federal Register 22804-22810 (part XXXIV) (April 27, 1998).

Enforcement Against Delinquent Filers

A number of agencies have asked for guidance on how to compel filers to submit financial disclosure reports when due. The regulation at subpart G of 5 C.F.R. part 2634 reflects the enforcement methods specified at 5 U.S.C. app. § 104. In addition to the civil remedy (monetary penalty up to \$10,000) and \$200 late filing fee for the public system, agencies should consider taking disciplinary action (such as reprimand, suspension, demotion, or removal) in accordance with personnel laws and regulations, against any individual for failing to file required public or confidential reports, or for filing such reports late.

OGE Calendar of Ethics Reports

Items Required without Specific Dates	Authority
1. Financial interest waivers considered/issued under 18 U.S.C. § 208(b)(1) and (b)(3).	E.O. 12674, § 301(d)
2. Copies of agency conflict of interest opinions.	5 U.S.C. App. § 403(2) 5 C.F.R. § 2638.313
3. Notice of conflict of interest referral (OGE Form 202).	5 U.S.C. App. § 402(e)(2) 5 C.F.R. § 2638.603(b)
4. Notification of disposition of referrals and any related disciplinary or remedial action.	5 U.S.C. App. § 402(e)(2) 5 C.F.R. § 2638.603(c)
5. Notice of actions taken to comply with ethics agreements of Presidential appointees confirmed by the Senate.	5 U.S.C. App. § 110 5 C.F.R. § 2634.804
6. Requests for Public Financial Disclosure Report (SF 278) exclusions for new entrant, annual, and termination filers.	5 U.S.C. App. § 101(f)(5) 5 C.F.R. § 2634.203(c)(1)
7. Requests for SF 278 extensions for new entrant, annual, and termination filers.	5 U.S.C. App. § 101(g) 5 C.F.R. § 2634.201(f)
8. Request for waiver of public SF 278 filing for senior level special Government employees (SGE) serving more than 60 but fewer than 130 days during the calendar year.	5 U.S.C. App. § 101(i) 5 C.F.R. § 2634.205
9. Requests for waiver of SF 278 late filing fee.	5 U.S.C. App. § 104(d)(2) 5 C.F.R. § 2634.704(b)
10. Requests for waiver of public reporting of personal gifts.	5 U.S.C. App. § 102(a)(2)(C) 5 C.F.R. § 2634.304(f)
11. Requests for agency separate component designation for 18 U.S.C. § 207(c).	18 U.S.C. § 207(h) 5 C.F.R. § 2641.201(e)
12. Requests for exemption from senior employee position designation under 18 U.S.C. § 207(c).	18 U.S.C. § 207(c)(2)(C) 5 C.F.R. § 2641.201(d)
13. Requests for OGE formal advisory opinions.	5 U.S.C. App. § 402(b)(8) 5 C.F.R. § 2638.304 & § 2638.312
14. Agency supplemental regulations to the interim OGE executive branch financial disclosure regulation.	5 C.F.R. § 2634.103
15. Agency supplemental regulations to OGE's executive branch standards of ethical conduct.	E.O. 12674, § 301(a) 5 C.F.R. § 2635.105
16. Requests for certificates of divestiture.	26 U.S.C. § 1043 5 C.F.R. § 2634.1002(b)(1)

OGE has revised its Calendar of Ethics Reports to help its readers keep track of the various required reports due to OGE (or to the executive agencies as noted). For this calendar, 5 U.S.C. App.

references are to the appendix containing the Ethics in Government Act of 1978. The full citation is 5 U.S.C. App. (Ethics in Government Act of 1978). Similarly, citations to Executive Order 12674, as

modified by Executive Order 12731, are cited as E.O. 12674. Finally, the regulations referenced in the Code of Federal Regulations (C.F.R.) are OGE's, unless otherwise noted.

Due Date	Report / Request / Action	Authority
2/1	Agency ethics program questionnaire for previous calendar year.	5 U.S.C. App. § 402(b)(10) & (e)(1) 5 C.F.R. § 2638.602(a)
May	Updated listing of Presidential appointees confirmed by the Senate and other persons, copies of whose SF 278s are required to be filed with OGE.	5 U.S.C. App. § 402(b)(10) 5 C.F.R. § 2638.601
5/15	Annual SF 278 Report filing deadline (to be filed with agencies).	5 U.S.C. App. § 101(d) 5 C.F.R. § 2634.201(a)
5/31	Semiannual report of travel payments accepted from non-Federal sources under 31 U.S.C. § 1353 from 10/1 to 3/31. <i>Negative reports required.</i>	31 U.S.C. § 1353(d) 41 C.F.R. § 304-1.9(a) (GSA regulation)
6/29	Requests for further 45-day OGE extensions to the annual SF 278 filing deadline, if already extended by agencies.	5 U.S.C. App. § 101(g) 5 C.F.R. § 2634.201(f)
8/15	Annual transmittal of reviewed separate confidential reports of payments to charities in lieu of honoraria (future requirement — not yet effective).	5 U.S.C. App. § 102(a)(1)(A) 5 C.F.R. § 2636.205(g)
9/15	Certified SF 278s from Presidential appointees confirmed by the Senate, Designated Agency Ethics Officials, and other specified individuals. Advise OGE if review takes longer.	5 U.S.C. App. § 103(c) 5 C.F.R. § 2634.602(c)
10/31	Annual Confidential Financial Disclosure Report (OGE Form 450) and Confidential Certificate of No New Interests (OGE Optional Form 450-A), if applicable.	E.O. 12674, § 201(d) 5 U.S.C. App. § 107(a) 5 C.F.R. § 2634.601(a), § 2634.903(a), & § 2634.905(d)
11/30	Annual update of current agency separate component designations for 18 U.S.C. § 207(c).	18 U.S.C. § 207(h) 5 C.F.R. § 2641.201(e)(3)(ii)
11/30	Annual update of positions previously exempted from senior employee designation under 18 U.S.C. § 207(c).	18 U.S.C. § 207(c)(2)(C) 5 C.F.R. § 2641.201(d)(3)(ii)
11/30	Semiannual report of travel payments accepted from non-Federal sources under 31 U.S.C. § 1353 from 4/1 to 9/30. <i>Negative reports required.</i>	31 U.S.C. § 1353(d) 41 C.F.R. § 304-1.9(a) (GSA regulation)

Unauthorized Use of OGE Form 450

Some agencies have inquired about using the standardized confidential disclosure form (OGE Form 450) to collect information from persons who are not Government employees, such as outside contractors or members of advisory committees who are appointed as representatives of outside interests. After consulting with agencies responsible for paperwork requirements and the Privacy Act, OGE has concluded that the OGE Form 450 should only be used by persons who are current or prospective Government employees. This is consistent with the controlling regulation at 5 C.F.R. §§ 2634.903 and 2634.904, and with our advice in a DAEOgram of December 13, 1995.

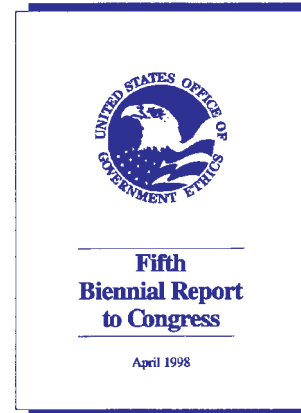
Use by others would exceed the Privacy Act and paperwork reduction purposes stated on the form, and would be outside the scope of the relevant Privacy Act system of records, the Ethics in Government Act, and Executive Order 12674.

Further, the purpose of confidential financial disclosure reports is to assist current and prospective employees in avoiding conflicts of interest under the

relevant criminal statutes and regulatory standards of conduct; that purpose is served for those who are subject to these conflict laws and regulations.

OGE Submits Biennial Report to Congress

OGE recently submitted its "Fifth Biennial Report To Congress," as required under current law. The report covers OGE activities from January 1, 1996 through December 31, 1997. The report, which summarizes developments and changes in the executive branch ethics program during this period, may be accessed and downloaded from the OGE Web site at <http://www.usoge.gov/usoge006.html>. It is located under the OGE Form and Publications section of the Ethics Resource Library.



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