

April 13, 2005 DO-05-009

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Jack Covaleski

Deputy Director for Agency Programs

SUBJECT: Due Dates for Public Financial Disclosure Reports of Executive Branch Officials

Required to File with the Office of Government Ethics (OGE)

Title I of the Ethics in Government Act of 1978, as amended, requires annual public financial disclosure reports (SF 278) to be filed with the appropriate department or agency no later than May 15. Each Designated Agency Ethics Official (DAEO) is to ensure that each report filed is reviewed within sixty days. The SF 278s of Presidential appointees confirmed by the Senate (PAS) must be submitted to this Office for final review and certification.

Last year we asked that you send in PAS reports as soon as they were certified, but no later than September 15, 2004. For those agencies that did not get their reports in by the due dates, we sent them a letter asking them to submit the reports immediately. For those reports that were not as yet certified by the agency, we requested they submit an uncertified report and a certified report shortly thereafter.

This year, all annual SF 278s for PAS officials and DAEOs filed by May 15, 2005 should be certified and submitted to OGE as soon as approved by your agency or department, but no later than August 1, 2005. If for some reason you cannot certify the report within this time frame, you must submit an uncertified report to OGE. The certified report must be submitted to OGE as soon as possible thereafter. If you submit an uncertified report, please make your OGE desk officer aware of the reason for the delay in certifying the report and the progress you are making towards certification. We will be happy to assist in any way we can to help you obtain the information needed to certify the report.

For those PAS officials for whom you have granted a filing extension, please see the table below for the appropriate certification and transmittal dates. In any event, we must have a report, preferably certified, for each of your PAS officials and the DAEO by the transmittal deadline. Our expectation is that you will certify all PAS reports within the sixty-day time frame

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set out in the statute. These reports are for the top executive branch officials and it is vital their reports be reviewed and certified by both our offices as soon as possible.

The new deadlines for the 2005 filing period are as follows:

Filing Deadline	Certification Deadline	Transmittal Deadline
May 16 (no extension)	July 15	August 1
June 30 (45-day extension)	August 29	September 13
August 15 (90-day extension)	October 14	October 31

Again, we are more than happy to assist you in resolving issues that may prevent you from certifying the PAS or DAEO reports within these time frames. If you have any questions, please contact Trish Zemple, Associate Director, Program Services Division at pczemple@oge.gov or at 202-482-9286.