

Who Should File an OGE Form 450?

Personnel described below are **required** to file an OGE Form 450:

- 1) Commanding officers, heads, deputy heads, and executive officers of all Army installations, bases, air stations or activities.
- 2) Civilian employees at grade GS-15 and below (or comparable pay level under other authority, e.g., NSPS), and military members below grade O-7 when they participate personally and substantially, through decision or exercise of significant judgment, and without substantial supervision and review, in taking an official action for:
 - contracting or procurement,
 - administering or monitoring grants, subsidies, licenses, or other Federal benefits,
 - regulating or auditing any non Federal entity, or
 - other activities in which the final decision may have a direct and substantial economic impact on the interests of any non Federal entity. Note that it is the final action or decision in a particular matter, not the individual's actions, that triggers the filing requirement.
- 3) Civilian employees at grade GS-15 and below (or comparable pay level under other authority, e.g., NSPS), and military members below grade O-7 when filing is determined to be necessary by the supervisor (i.e., when the supervisor is unsure of whether employee meets standards in (2), above, but prefers employee to file regardless).
- 4) Personnel serving under the Intergovernmental Personnel Act (IPA) and Highly Qualified Experts (HQEs), who are not required to file an SF 278 but are serving in a position requiring filing under 2, above. Most IPAs are not required to file an SF 278.

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Personnel described below are **excluded** from filing the OGE Form 450

1) Personnel whose duties are such that the possibility that the employee will be involved in a real or apparent conflict of interest is remote, or there is a substantial degree of supervision and review of the employee's duties, or the effect of any potential conflict on the integrity of the Government is inconsequential.

2) Personnel not employed in contracting or procurement who have authority to make purchases less than \$2,500 per purchase and less than \$20,000 cumulatively per year.

3) IMPAC card holders and micro-purchasers who make annual purchases totaling less than the simplified acquisition threshold, currently \$100,000, unless they either hold contracting warrants, administer or monitor grants, subsidies, licenses, or other federally-conferred financial or operational benefits, or are engaged in the regulating or auditing of any non-federal entity.

- However, such card holders who would otherwise be excluded may be required to file the form when their supervisor determines that the card holder has duties that involve the exercise of significant independent judgment over matters that will have a substantial impact on the integrity of Army operations, or when there is little supervision on the card holder's purchases.

4) Academic student interns also shall be excluded from the filing requirement, unless either one of the following conditions exists:

- The student intern either holds contracting warrants, administers or monitors grants, subsidies, licenses, or other federally-conferred financial or operational benefits, or is engaged in the regulating or auditing of any non-federal entity; or
- The supervisor determines the intern has duties that involve the exercise of significant independent judgment over matters having a substantial impact on the integrity of Army operations.