

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

> August 29, 2011 PA-11-04

MEMORANDUM

TO: Designated Agency Ethics Officials

- FROM: Rashmi Bartlett Associate Director for Program Reviews
- SUBJECT: Financial Disclosure Certification

This Program Management Advisory serves as a reminder and clarification of the requirements for timely certification of financial disclosure reports under 5 C.F.R. § 2634.605(a). During recent program reviews, PRD has found some confusion and different interpretations among agencies regarding the requirement to accomplish final certification of financial disclosure reports within 60 days of their receipt.

Final certification of the OGE Form 278 and OGE Form 450 must occur within 60 days of report receipt when the reports do not require additional information or remedial action.¹ For agencies with intermediate certification and multiple review levels, OGE will determine that an agency is in compliance with the 60-day requirement if (1) someone designated as a reviewing official (versus the DAEO) has reviewed the report and (2) the reviewing official certifies that the report is in compliance with applicable laws and regulations. Certification of the OGE Form 278 by either the DAEO or reviewing official must be indicated by a signature in the "Agency Ethics Official's Opinion" block. (See Figure 1) Certification of the OGE Form 450 by either the DAEO or reviewing official must be indicated by a signature in either the "Intermediate Reviewer" or "Final Reviewing Official" block. (See Figure 2)

Please contact me at (202) 482-9317 or by email at <u>Rashmi.Bartlett@oge.gov</u> if you have any questions.

¹ See the Reviewer's Reference (page 4-3) and 5 C.F.R. § 2634.605(a).

Figure 1: OGE Form 278 signature block	Κ.
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Certification	Signature of Reporting Individual	Date (Month, Day, Year)
l CERTIFY that the statements I have made on this form and all attached schedules are true, complete and correct to the best of my knowledge.		
Other Review	Signature of Other Reviewer	Date (Month, Day, Year)
(If desired by agency)		
Agency Ethics Official's Opinion	Signature of Designated Agency Ethics Official/Reviewing Official	Date (Month, Day, Year)
On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments in the box below).		
Office of Government Ethics Use Only	Signature	Date (Month, Day, Year)

Figure 2: OGE Form 450 signature block.

FOR REVIEWERS' USE ONLY: On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations, except as noted in the "comments" box below.					
Signature and Title of Supervisor/Other Intermediate Reviewer (if requ	iired by the agency)	Date (mm/dd/yy)			
E-mail Address	Phone Number				
Signature and Title of Agency's Final Reviewing Official		Date (mm/dd/yy)			
Comments of Reviewing Officials					
(Check box if continued on additional page [])					