April 2, 2020 PA-20-02

PROGRAM ADVISORY

TO: Designated Agency Ethics Officials

FROM: David J. Apol General Counsel

SUBJECT: Deadlines and Procedures for Annual Public Financial Disclosure Reports of Executive Branch Employees (2020 Filing Cycle)

This program advisory provides filing deadlines for the public financial disclosure reports of executive branch employees and procedures for the reports agencies are required to transmit to the U.S. Office of Government Ethics (OGE).

OGE has been asked whether, in light of the COVID-19 pandemic, it will issue an executive branchwide extension of the filing deadlines. OGE is not issuing such an extension because agency ethics officials are best positioned to address the needs and changeable circumstances of their agencies' officials and because the vast majority of public financial disclosure reports are now filed, reviewed, and certified electronically. Agency ethics officials may grant extensions for employees or classes of employees for up to 45 days. Agency ethics officials may also grant a second 45-day extension upon written request.

Deadlines for 2020 Annual Reports

The deadlines for 2020 annual reports of public filers are listed below.

Friday, May 15 – deadline for filing the report without an extension

Monday, June 15 – reports filed by May 15 must be released to public upon request

Monday, June 29 – deadline for filing the report with a 45-day extension

Tuesday, July 14 – deadline for certifying reports filed by May 15 and not requiring additional information

Thursday, August 13 – deadline for filing the report with a 90-day extension

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Friday, December 11 – final deadline for agencies to transmit reports to OGE which required additional information

Once a report is filed with the agency, it must be reviewed by the agency within 60 days. Once certified, reports that are reviewed by OGE must be promptly forwarded by the agency to OGE.

OGE will provide additional guidance on the deadlines for closing the 2020 annual review cycle at a later date. If you have any questions about this program advisory please contact Megan Granahan at 202-482-9204 or <u>mvgranah@oge.gov</u>.