

FAQS

Q1: Who must file the OGE 450?

A: Here's the key: If you touch money or make decisions concerning where money goes, you may be in a "covered position" and need to file the OGE 450.

CIVPERS GS-15 or below (and NSPS equivalent) and MILPERS below 0-7 must file an OGE 450 only if the duties/responsibilities of a position require the employee "to participate personally and substantially through decision or the exercise of significant judgment, and without substantial supervision and review, in taking a Government action regarding certain actions" which include:

- Contracting or procurement
- Administering/monitoring grants, subsidies, licenses, or other federally conferred financial/operational benefits
- Regulating/auditing any non-Federal entity
- Other activities in which the final decision or action will have a direct and substantial economic effect on the interests of any non-Federal entity
- Additionally, one can be an OGE 450 filer if "the agency concludes that the duties and responsibilities of the employee's position require the employee to file such a report to avoid involvement in a real or apparent conflict of interest, and to carry out the purposes behind any statute, Executive order, rule, or regulation applicable to or administered by the employee."

[NOTE: Senior Executive Service and 0-7 and above employees file a different financial form (SF 278)]

Q2: Who doesn't need to file an OGE 450?

A: Just because you are in a position listed above does not mean you automatically fill out the OGE 450. The OGE 450 is not required if it is unlikely the employee would be involved in a real or apparent conflict of interest.

EXAMPLE: Suppose SAF/AQ has a GS-5 procurement assistant who types and processes documents, answers status update questions, and performs other office support functions, such as filing and copying. The employee is not involved with contracting and has no other actual procurement responsibilities. Because it is very remote that this employee would be involved in a real or apparent conflict of interest, the employee does not need to file the OGE 450.

- **OR The employee has a substantial degree of supervision.**
- **OR The employee controls matters with a low dollar threshold.**

EXAMPLE: Micro-purchasers with annual purchases less than \$100,000 (the current Federal Acquisition Regulations simplified acquisition threshold) and their certifying officers - unless the supervisor feels otherwise (duties involve significant independent judgment over matters with substantial impact on the integrity of USAF operations and relationships with non-Federal entities).

-Unless contracting warrant employees (or others) fall within the "must file" categories.

Q3: How do I determine whether I have to fill out an OGE 450 form or 450-A? I filed an annual OGE Form 450 covering the reporting period of January 1, 2009 through December 31, 2009. I have reviewed my copy of that report. Between January 1, 2010 and December 31, 2010, there have been no changes in the information that I reported on that form. I have no new assets and income, no new liabilities, no new outside positions, no new agreements and arrangements.

- A. It depends. If your agency has approved the use of the OGE 450-A for its employees, you may file the 450-A because the information on your form has not changed from the prior year. Not all agencies, however, use the 450-A. Even if an agency has approved the use of the form, they may periodically require you to file a new OGE Form 450 even if you have no changes to the form. Check with your agency ethics official.

Q4: How do I know if I am an annual filer or a new entrant?

- A. You are an annual filer if last year you filed an OGE Form 450 or an OGE Form 450-A. You are a new entrant if you did not file an OGE Form 450 or an OGE Form 450-A last year.

Q5: I am a new entrant. What is my date of appointment?

- A. Your date of appointment is the date that you began working in the position that requires you to file the OGE Form 450. It is **not** the date that you began working for the federal Government unless that is when you started working in the position that requires you to file.

Q6: I am an annual filer. Which parts of the form do I fill out?

- A. As an annual filer, you are responsible for answering all five statements on the signature page by checking either “Yes” or the “No” box for each statement. Then you must fill out each part of the form for which you checked “yes.”

Q7: I am a new entrant. Which parts of the form do I fill out?

- A. As a new entrant, you are responsible for answering the first four statements on the signature page by checking either “Yes” or the “No” box for each statement. Then you must fill out each part of the form for which you checked “yes.”

Q8: What is the reporting period for this year’s annual report?

- A. The reporting period for the annual report due on February 15, 2010 is the 12-month period from January 1, 2009 through December 31, 2009. Refer to your financial records for this 12-month period in order to provide information requested on the form.

Q9: What is the reporting period for a new entrant report?

- A. The reporting period for a new entrant report is the 12-month period preceding you filing of this form. Refer to your financial records for this 12-month period in order to provide the information requested on the form.

Q10: I heard that under the new regulation, I do not have to report any mutual funds that I, my spouse, or my dependent children own. Is that true?

- A. Not completely. The new regulation eliminated only the requirement to report diversified mutual funds. You still must report the names of the sector mutual funds in which you, your spouse, or you dependent own shares.

Q11: What is a sector fund?

- A. A sector fund is a mutual fund that concentrates its investments in an industry, business, single country other than the United States, or bonds or a single State within the United States. Please consult you ethics official if you have questions.

Q12: Do I have to report all assets that I owned from January 1, 2009 through December 31, 2009 and all income that I earned during this period?

- A. No. You have to report your assets (for example, stocks, sector mutual funds, bonds, and real estate) that are valued at more than \$1,000 at the end of the reporting period. For example, if you owned stock in ABC Inc. that was worth \$3,000 on December 31, 2009, you must list ABC Inc. on the form.

Q13: I owned stock in a company in 2009, but I sold it before the end of the year. When I sold it, the stock was worth \$2,000, and it earned \$500 in capital gains. Because I no longer own it, do I still have to report the name of the company on the OGE Form 450?

- A. Yes. Because the stock earned more than \$200 in income during the reporting period, you must report the name of the company on the form even though you did not own the stock at the end of the reporting period. Also, you must check the box in the “No longer held” column to indicate that you no longer own this stock.

Q14: I am employed part-time as a professor at a local college. I’m paid only \$500 for teaching one class. Do I have to list the college on my report?

- A. Yes, if you earn more than \$200 from this part-time employment, you have to list it on Part I of the form. In addition, you have to list it in Part III because your part-time employment as a professor is considered to be an outside position.

Q15: I am instructed to report travel-related reimbursements and gifts totaling more than \$335 (the aggregation threshold) from any one source during the reporting period. It also instructs me that I do not have to report any item valued at \$134 or less, nor do I even include such an item in calculating the aggregation threshold. Where do these numbers come from?

- A. These amounts are tied under the Ethics in Government Act and OGE regulations to the “minimal value” for reporting foreign gifts under the Foreign Gifts and Decorations Act. The General Services Administration redefines this value every three years. The last revision occurred in 2007. The next adjustment is due to occur in 2010.

Q16: My job does not normally deal with Acquisition, Contracts or Procurement, but I sat on a Source Selection Committee for a million dollar contract. Do I need to file OGE 450?

- A. Yes. Even though you normally would not have to file, the Air Force Ethics Office recommends filing an OGE 450 for the fiscal year in question.

Q17: When I file my OGE Form 450, can I use any year’s version of the form?

- A. No. In order to view all new updates to the form, you need the current version, which is the December 2011 edition.

REMEMBER: WHEN IN DOUBT, CHECK WITH THE AIR FORCE ETHICS OFFICE BEFORE FILING THE OGE 450 UNNECESSARILY.