

Determining Which Positions Should File A Confidential Financial Disclosure Report: A Worksheet

This job aid is designed to assist supervisors in determining whether a career employee should file a Confidential Financial Disclosure Report (OGE Form 450). If you have questions about the criteria listed below, please contact the Air Force Ethics Office at SAF.GCA.Ethics.Workflow@us.af.mil or 703-693-0417.

Employee's Name: _____

Date: _____

Position Title: _____

CAC Email: _____

I. Pay

1. Is the employee's position classified at or below the GS-15 level, or, if military, below the rank of O-7?

OR

If the employee is not paid on the GS scale, is the employee's rate of basic pay less than 120% of the minimum rate of basic pay for the GS-15 level?

Note: For purposes of financial disclosure, the term "**rate of basic pay**" means the lowest level of pay authorized for a position's pay grade/band (not the actual pay received). Basic pay does not include locality pay, bonuses, etc., and for re-employed annuitants, the rate of basic pay is calculated before any salary offset is applied. For 2024, the threshold rate of basic pay is **\$147,649**.

Yes

Go to Question 2

No



Your agency's Ethics Office will determine if this employee must file a Public Financial Disclosure form

II. Type of Work Done by the Employee

2. Does the employee's work involve at least one of the following:

➤ Contracting procurement actions above the micro-purchase threshold (currently \$10,000) or with an annual total that is greater than the simplified threshold (currently \$250,000).

***Example:** A GS-9 Admin Assistant makes GPC purchases of office supplies for her work unit, but each purchase totals less than \$10,000 and she never spends more than \$80,000 annually. She would be excluded from filing. If her annual purchases totaled more than \$250,000, then she would file.*

➤ Administering, awarding, monitoring, or making determinations regarding grants, subsidies, licenses, or other federal benefits;

➤ Regulating, auditing, or inspecting non-federal entities;* or,

➤ Performing other activities when those activities will have a direct and substantial effect on the financial interest of non-federal entities.

**Non-federal entities include, but are not limited to, businesses, non-profit organizations, and state and local governments.*

Yes

Go to Question 4

No

Go to Question 3

3. Is the employee serving in any other position where there is a potential for conflicts of interest, appearance of favoritism, or loss of impartiality?

Examples include:

➤ Reviewing or making recommendations concerning products/services for potential future acquisitions or use by the Government;

➤ Representing the United States in litigation or other proceedings; or

➤ Scientific or social science research, when research will have a direct and substantial effect on the financial interests of non-federal entities.


Yes

Go to Question 4




No



If you said "No" to questions 2 **and** 3, the employee does NOT need to file.

<p>4. Does the employee:</p> <p>➤ Only provide factual information?</p> <p><i>Example: A GS-13 librarian for the Patent and Trademark Office (PTO) shows PTO staff members ow to research the uniqueness of an invention and design complex search queries of the agency's databases. The librarian does not make decision on the patentability of the invention.</i></p> <p>OR</p> <p>➤ Only work on administrative or peripheral matters?</p> <p><i>Example: A draftsman prepares the drawings to be used by an agency soliciting bids for construction work on a bridge based on specification provided by others. He is not involved in determining the specs or the contracting process.</i></p> <p><i>Example: An agency just hired a GS-5 Procurement Assistant who is responsible for typing and processing procurement documents, answering statue inquiries from the public performing office support duties such as filing and copying, and maintaining an online database. The Assistant has no contracting or procurement responsibilities.</i></p>	<p>Yes</p>  <p>The employee does NOT need to file an OGE Form 450.</p>	<p>No</p> <p>Go to Question 5</p>
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III. Employee's Level of Responsibility

<p>5. Does the employee:</p> <p>➤ Engage in the work activity identified in Section II by exercising significant judgment in performing any of the following job functions?</p> <p>➤ Making decisions;</p> <p>➤ Approving or disapproving;</p> <p>➤ Making recommendations;</p> <p>➤ Conducting investigations;</p> <p>➤ Rendering advice or opinions.</p> <p>OR</p> <p>➤ Actively supervise a subordinate's performance of any of the above-listed job functions?</p>	<p>Yes</p> <p>Go to Question 6</p>	<p>No</p>  <p>The employee does NOT need to file an OGE Form 450.</p>
<p>6. Does the employee receive substantial supervisory review and oversight with very little independent judgment or authority?</p> <p><i>Example: A senior contract specialist develops requests for proposals with substantial independence of action and exercises significant judgment in doing so, even though he is ultimately supervised by the contracting officer. The specialist is participating personally and substantially in the acquisition process and should be required to file a confidential financial disclosure report. By contrast, a contracting intern who assists him in developing portions of the requests does so with significant oversight from the specialist and the contracting officer. The contracting intern should not be required to file.</i></p>	<p>Yes</p>  <p>The employee does NOT need to file an OGE Form 450.</p>	<p>No</p>  <p>The employee SHOULD file an OGE Form 450.</p>

Name and Signature of Supervisor:_____

E-mail and Phone Number of Supervisor:_____