DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

Office Of The General Counsel

6 February 2022

MEMORANDUM FOR ALL PUBLIC FINANCIAL DISCLOSURE REPORT FILERS

FROM: SAF/GCA

SUBJECT: OGE Form 278e Public Financial Disclosure Reports and Annual Ethics Training Requirement

The U.S. Office of Government Ethics (OGE) Form 278e Public Financial Disclosure Report filing season is underway. If you have filled out your report, thank you for submitting your report early.

Filer's Responsibilities

If you have not filed your report, this is a reminder that the deadline for submitting the report this year is **Monday, May 16, 2022**. You will file your report in the Integrity e-filing system, https://www.integrity.gov/efeds-login/index.html.

- **Please notify SAF/GCA if you cannot log in.** If you cannot log in to the Integrity system, the issue is probably a change in your email address since the last time that you logged in. SAF/GCA will register you with your new email address and provide you with instructions about how to activate your new account. You will have access to your prior reports in the system. Notify Justin Marby or Amy Braud for assistance.

- **Verify that your supervisor is correct.** Prior to pre-populating your OGE Form 278e report, verify that your report will be sent to the correct supervisor. Only your ethics office has the ability to correct the supervisor role, a task that is easier to accomplish before you pre-populate the report. Attachment 1 contains instructions explaining how to identify the supervisor who will receive your report. Notify your ethics official if your supervisor is incorrect. Filers assigned to Headquarters Air Force should contact Amy Braud.

- **Pre-populate your 2022 report with the information from your last report in the system.** You can then edit the entries to reflect your CY 2021 information. For those filing a termination or combination report, the reporting period will be different for each filer. Contact your ethics official for advice about your particular circumstances. Attachment 2 explains how to pre-populate a report.

- **Import transactions from 278-Ts.** If you filed periodic transaction reports (OGE Form 278-T) disclosing purchases, sales, and exchanges that occurred in CY 2021, you are required to report those transactions again on the Transactions section of your 2022 report. You have the ability to pre-populate the Transactions section of the 2022 report with the data from your 278-Ts in the Integrity system. You are required to report all transactions that occurred in CY 2021. Attachment 3 explains how to import the 278-Ts onto the OGE Form 278e.

- **Report on the Transactions section any transactions not previously reported on a 278-T.** In addition to importing the data from your 278-Ts, add any 2021 transactions not reported on a 278-T. Because transactions involving mutual funds, exchange-traded funds and real estate are not required on the 278-T, you may not have disclosed these on a 278-T and will need to add them to your 2022 report.
- **The reporting period for the annual report is 1 January 2021 through 31 December 2021.** Your 2022 annual OGE Form 278e covers assets held in CY 2021, income received in CY 2021, and transactions that occurred in CY 2022. The sections for Outside Positions and Agreements/Arrangements must also include information for CY 2021 through the date that you sign the report. For those filing a termination or combination report, the reporting period will be different for each filer. Contact your ethics official for advice about your particular circumstances.
- Brokerage statements may **not** be attached in lieu of making individual entries on the OGE Form 278e.
- For good cause, (e.g. illness, deployment, etc.) you may be granted up to 45 additional days to complete the form. To avoid a $200 late filing fee imposed by law, send your request for an extension in writing (email is acceptable) to your local ethics counsel BEFORE May 16, 2022.
- **Respond promptly to questions from the ethics official reviewing your report.** Although your deadline for submitting the annual report is 16 May 2022, the ethics official has a different deadline for reviewing and closing a report. In order to comply with the Federal regulation for reviewing these reports, the ethics official must close the report within 60 days of the date that you submit the report. It is critical that ethics officials receive the answers to their questions as soon as possible in order to meet this deadline.

Filers Who Are Retiring or Otherwise Leaving the Air Force in CY 2022

Please contact your ethics official if you are retiring, separating from Federal service, or otherwise leaving your filing position this year and provide the date of your retirement or departure. You are required to file a termination OGE Form 278e when you retire, separate from Federal service, or change your personnel status (for example, from a Schedule C employee to GS employee). Filing an annual OGE Form 278e does not satisfy this requirement. You may, however, be able to file a combination report encompassing both requirements. This will depend upon the date of your retirement or departure.

Substantive Guidance About What to Report and How

To assist you in filling out your report, I have attached a list of the information that filers must include but most often fail to provide on the OGE Form 278e. If you omit this information, you will be required to amend the report to add the information before the ethics counselor can certify that you are in compliance with both the financial disclosure law and regulation and the conflict of interest laws. In its online public financial disclosure guide, the U.S. Office of Government Ethics provides comprehensive examples of how to report information. You can find the guide on OGE's website at: https://www.oge.gov/Web/278eGuide.nsf. You may also contact SAF/GCA with any questions that you have.

The primary mistake that filers make is failing to list each investment in an IRA, a brokerage account, a managed account, or other investment account. You must list the full name of each investment in this type of account, along with the value of and income received from each investment. For example, if you own shares of the Fidelity Blue Chip Growth Fund in your IRA, you must report "Fidelity Blue Chip Growth Fund" and not simply "IRA."

Supervisor's Responsibilities

If you are a supervisor of an OGE Form 278e filer, you must review and sign the report before the ethics counselor can sign the report. *See* Joint Ethics Regulation, DoD 5500.7-R, Section 7-206. To help your ethics counselor meet the 60-day review deadline, you should complete your review within 2 weeks after your subordinate submits the OGE Form 278e to you.

As a supervisor, you will receive a system-generated e-mail when your subordinate signs an OGE Form 278e or an OGE Form 278-T and every two weeks until you sign the report.

Ethics Counselor's Responsibilities

Once your supervisor signs and transmits your report to the ethics counselor, the ethics counselor will review it to ensure that it complies with the financial disclosure requirements of the Federal statute and regulation and to identify any entities in which you have a financial interest that do business with the Department of Defense. You will be advised in writing of any actual or potential conflicts of interests that are identified, and we will work with you on the best approach to resolve any conflicts.

Annual Ethics Training Requirement

Public financial disclosure filers are required by a Federal regulation to complete one hour of ethics training each year. For filers at Headquarters Air Force, SAF/GCA will distribute its schedule of 2022 annual ethics training sessions as soon as the schedule is finalized. Your annual ethics training must be completed by 30 November 2022.

Technical Assistance with *Integrity.gov*

If you have any technical difficulties with *Integrity.gov*, contact your ethics official or SAF/GCA (Mr. Marby or Ms. Braud) instead of the *Integrity.gov* or *max.gov* help desks. *Max.gov* is rarely the source of any technical issues that prevent your access to *Integrity.gov*, so you will lose valuable time contacting that help desk. With regard to the *Integrity.gov* help desk, filers and supervisors must route all requests for help through their ethics officials. The *Integrity.gov* help desk will process requests for assistance only from ethics officials and not from filers.

Conclusion

The OGE Form 278e process reinforces the Air Force core value *"Integrity First."* As Senior Leader, our decisions, recommendations and advice impact those both inside and outside of the Air Force. You are prohibited by law from taking any official action that could have a direct and predictable effect on your own financial interests, as well as those of your spouse and dependent children. The OGE Form 278e is a visible demonstration of your commitment to the highest ethical standards and provides public reassurance that your official actions are not influenced in any way by personal interests or affiliations.

Designated ethics counselors in the Air Force Ethics Office in SAF/GCA are available to assist you with any questions you may have regarding how to comply with this important ethics requirement. We encourage you to contact them for assistance. Your timely participation and compliance with this requirement is greatly appreciated.

Respectfully,

MCGUIRE.SHANNON.ANN.1102012387
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SHANNON A. McGUIRE
Deputy General Counsel
Fiscal, Ethics & Administrative Law

Attachments:
1. How to Find Your Supervisor in *Integrity.gov*
2. How to Pre-Populate an OGE Form 278e
3. How to Import Transactions from an OGE Form 278-T to an OGE Form 278e
4. List of Information Commonly Omitted from the OGE Form 278e

January 2022

How to Find Your Supervisor For a Report in Integrity

Before you begin entering data into your OGE Form 278e, verify that you are aligned with the correct supervisor. Follow these instructions to see who the supervisor for your group is:

1) Log in to Integrity. You should be on the My Tasks page.

2) On the My Tasks page, you will see your 2022 report under the My Current Reports heading.

My Current Reports

YEAR	ITEM	TYPE	AGENCY	GROUP	POSITION	DUE DATE	STATUS	DATE FILED	ACTION
2022	Annual Report	278	Department of the Air Force	AF/A1	Director	16 May 2022	Not Started		Start

3) Under the Status column, you will see “Not Started.” Click on the words “Not Started.”

4) You will see the Workflow page for that report.

5) If your supervisor is not correct, contact either me or Justin Marby so that we can place you in the correct group before you start your report.

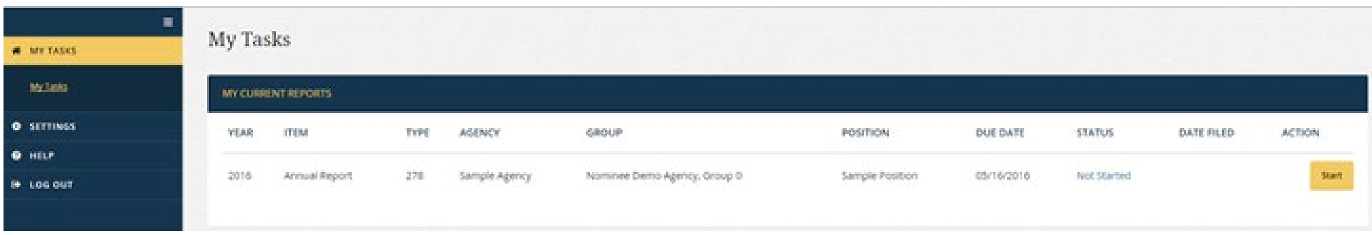
UNITED STATES OFFICE OF
GOVERNMENT ETHICS
Preventing Conflicts of Interest
in the Executive Branch

Filer Prepopulate

INTEGRITY.gov
Play your part.

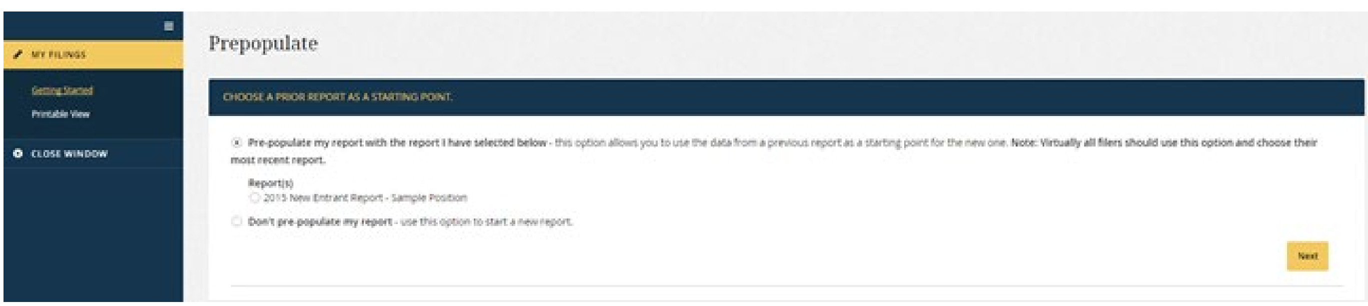
A returning filer who has previously filed a report in *Integrity* may use the earlier report to “pre-populate” a new filing. Prepopulate will copy the data from the prior report into the new one.

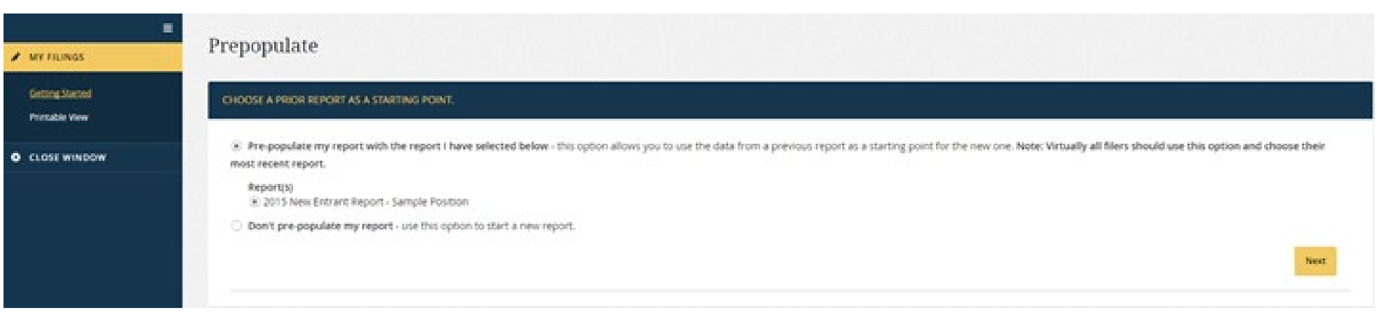
1. Log into *Integrity* and find the report that you need to file in the “**My Current Reports**” section of the “**My Tasks**” page:



2. Select the “**Start**” button at the far right side of the page.

3. On the next page, you will see a list of prior reports that you can use to pre-populate your new report. In most cases, you should select the most recent report (e.g., your last Annual report).





4. Select the “**Next**” button at the far right side of the page.

5. This message displays while *Integrity* pre-populates the report:

6. Once the pre-population process is complete, you will arrive at the “Getting Started” page. Complete the rest of your report as normal, changing the pre-populated information or adding new entries as needed.

Note: You will need to select **Next** and navigate through each "part" of the report before submitting. **The left side menu will expand as you move through the report.**

A filer may edit while moving through each part or wait until the **Report Data (Summary)** link appears. Click that to view the entire report. That view includes “Edit” action buttons to jump to a particular part to make changes.

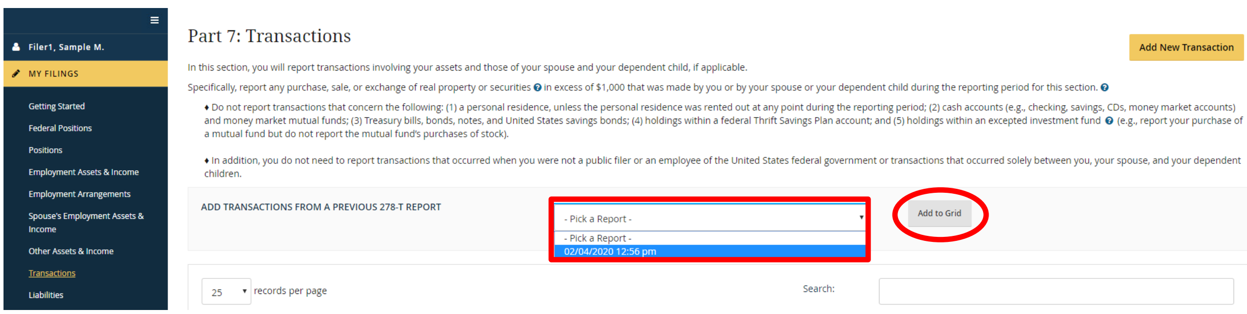
Reference: *Integrity* User Guide, § 4.2.3. User Guide available here https://community.max.gov/x/vQApLg.

Note: If a filer previously registered a designee to complete the form, the filer may need to register/re-invite the designee again. The designee will likely have to reset the password.

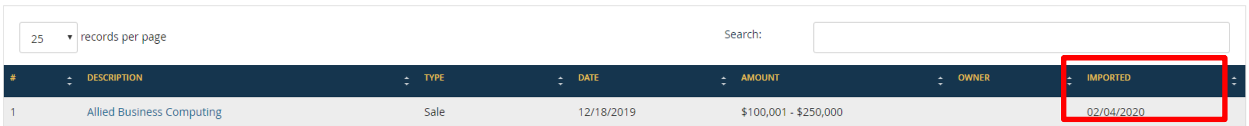
How to Import Transactions from a Periodic Transaction Report onto the Transactions Section of the Annual and Termination 278s

Integrity allows the Filer to import transactions directly from prior Periodic Transaction reports into the Part 7 grid.

To import transactions onto the Transactions section of the annual and termination 278s, the Filer goes to the "Transactions" section and selects a report from the "Add Transactions" drop-down field. Then, the Filer clicks the "Add to Grid" button.



The transactions from the selected report appear in the data entry grid. The "Imported" column will display the date of the imported report. This column does not appear on the printable, publicly releasable version of the report.



If the Filer edits an imported transaction, the "Imported" column will note the edit.