

Who is Required to File the OGE Form 450?

The Office of Government Ethics (OGE) Form 450 is a confidential financial disclosure form for government employees within certain positions. The OGE requires these employees to disclose financial information regarding their assets, liabilities, outside positions, etc. to ensure that financial conflicts of interest, or appearances thereof, do not occur.

Not all government employees are required to file the OGE Form 450. Government employees required to file are typically those in a position below GS-15 or O-7, who have **substantial and personal involvement** in certain government actions. These actions include: contracting or procurement; administering and monitoring grants, subsidies, and licenses; regulating or auditing any non-federal entity; and activities in which the final decision will have **a direct and substantial economic effect on the interests of any non-federal entity**. If an employee is significantly involved in decision making, approving or disapproving matters, making recommendations, conducting investigations, or rendering advice or opinions regarding those government actions, or if the employee supervises a subordinate in those actions, the employee likely must file the OGE 450.

Even if an employee falls into one of the positions outlined above, there are exceptions that may preclude an employee from filing the OGE 450.

1. If the employee receives substantial review from a supervisor when engaging in the above actions, the employee does not need to file the OGE 450. Additionally, if the employee's duties are such that there is little to no possibility that the employee would be involved in a conflict of interest, real or apparent, the employee need not file the OGE 450.
2. Employees who are not involved in contracting or procurement who are authorized to make purchases less than \$2,500 per purchase and less than \$20,000 per year do not need to file the OGE 450.
3. Government credit card holders who make annual purchases totaling less than \$100,000 do not need to file the OGE 450. However, they will be required to file the OGE 450 if they hold contracting warrants, administer or monitor grants, or subsidies, or are engaged in regulating or auditing any non-federal entity.
4. Academic interns do not need to file the OGE 450. However, they will be required to file the OGE 450 if they hold contracting warrants, administer or monitor grants, or subsidies, or are engaged in regulating or auditing any non-federal entity.

If an employee's supervisor determines that the employee should file the OGE 450, the employee must file regardless of whether he or she meets one of the exceptions.

Please contact LTC May Nicholson at may.l.nicholson.mil@mail.mil if you have questions.