

**U. S. OFFICE OF GOVERNMENT ETHICS  
JUSTIFICATION FOR A NONMATERIAL/NONSUBSTANTIVE CHANGE  
OGE FORM 450 EXECUTIVE BRANCH CONFIDENTIAL  
FINANCIAL DISCLOSURE REPORT  
SEPTEMBER 2020**

The OGE Form 450 has been approved for use until November 2021. The current information collection request includes one information collection instrument, a PDF version of the form. OGE is now requesting approval to make a Microsoft Excel version of the OGE Form 450 available for use as a second instrument. The proposed Excel version will collect the same information as the approved PDF instrument, and the instructions are the same. The only differences are slight variations in line breaks, font, and the number of blank data entry rows on the Part I pages. The public burden will not be affected. Accordingly, OGE is requesting a nonmaterial/nonsubstantive change to add the second information collection instrument to the information collection.

The purpose of the proposed Excel version is to improve the user experience, particularly for confidential filers with extensive assets. OGE currently makes available two versions of the OGE Form 450 PDF form. The first version is 508-compliant but static, meaning there is no way for the user to add additional pages within the form file itself. Several continuation pages are instead provided at the end of the file. The second version is not 508-compliant but it is dynamic, meaning the user can add pages by clicking an “Add Page” button which appears at the bottom of each page. Unfortunately, the second, dynamic version contains a number of technical defects that have proven difficult to fix. In the interests of providing a fully functional, dynamic version of the OGE Form 450 to users within the limits of OGE’s resources, OGE has developed a Microsoft Excel file that recreates the existing (August 2020) OGE Form 450. Users would be able to add pages by copying the appropriate tab within the Excel file.