

### Summary of OGE Form 450 Comments

In the last review and clearance for the OGE Form 450, the Office of Management and Budget, Office of Information and Regulatory Affairs (OIRA), directed the Office of Government Ethics (OGE) to incorporate public feedback that will improve the clarity and efficiency of this collection and to update OIRA every six months until OGE makes a final determination, in consultation with OMB, regarding updates to the collection.

OGE created an action plan to capture and evaluate public and stakeholder feedback from a variety of sources. During the implementation of this plan, OGE received comments from OGE employees, agency ethics officials, and a member of the public. A majority of the comments OGE received are related to the definitions and instructions.

OGE thoroughly considered each comment submitted. OGE accepted those suggested changes that improve clarity and efficiency of this collection. OGE rejected other suggested changes due to a lack of regulatory authority, adequate budget resources, or agency support.

The following is a summary of the comments received and their disposition:

<b>Commenter</b>	<b>Suggestion</b>	<b>Disposition</b>
Comments received during public and agency sessions	<p>Over the course of the current life of the OGE Form 450, OGE has offered 3 options for agencies and filers:</p> <ul style="list-style-type: none"> <li>• the <b>static PDF</b>, which is fillable, but you can't add pages; [508 compliant]</li> <li>• the <b>dynamic PDF</b> which is also fillable and you can add pages; and</li> <li>• the <b>Excel</b> version which has an add page feature.</li> </ul> <p>It has come to OGE's attention that the dynamic PDF is problematic for both the filer and the agencies to manage when pages are added. In response to comments and forms presented to OGE for review, OGE sought guidance and was advised by its internal IT Department (ITD) that there are no vendors including Adobe that can support or resolve any of the dynamic PDF issues, thus rendering the form unmanageable and burdensome</p>	<p>OGE is formally retiring the dynamic PDF version of the form due to technical problems. OGE is maintaining the static PDF version, as requested by agencies, and restructuring it by breaking out each part of the report on a separate page and adding more pages to provide ample additional pages for the average filer. OGE believes that this major change in structure will address and lessen the burden to filers, agencies, and OGE reviewers.</p>

	<p>for OGE as well as agencies and filers.</p> <p>During public and agency sessions, agencies requested that OGE maintain at least one PDF option of the form.</p>	
<b>FORM STRUCTURE, INSTRUCTIONS, and DEFINITIONS</b>		
OGE subject matter expert	OGE identified a potential need and asked agency officials about their thoughts on moving all instructions to the beginning of the OGE Form 450, which is similar to that of the OGE Form 278e.	OGE accepts the agency's suggestion to add examples rather than move the instructions because agencies believe the change will be more beneficial and provide greater clarity for filers.
OGE subject matter expert and agency comment	An OGE subject matter expert suggested changing the numbering of the parts from roman numerals to cardinal numbering. The rationale is that it would make it easier to reference the parts of the report.	OGE declines to make this change because agencies expressed no interest in it and noted it would require changes to the electronic filing systems, which are costly.
Agency written comments and comments received during public and agency sessions	OGE should repeat the reporting period for each part of the report within the instructions box for each part.	OGE declines to make this change due to the lack of space on the form but will consider it if the form is restructured in the future.
<b>COVER PAGE: STEP 1 and STEP 2</b>		
Comments received during public and agency sessions	OGE should clarify the definitions and/or the instructions of the definition of "Special Government Employee" (SGE).	OGE accepts this change. The form provides a succinct definition that will aid filers and agency reviewers.
OGE subject matter expert	OGE should add a box that asks the filer to identify the type of asset with standard responses.	OGE declines to make this change based upon the lack of support from the public and agency reviewers.

<p>Agency written comments and comments during public and agency sessions</p>	<p>OGE should add a question concerning a filer’s marital status. The rationale is that it would provide clarity to agency reviewers on what they should expect to see in the report.</p> <p>The form as it currently exists does provide for an option to self-identify an asset’s owner, however, it is not required by the regulation.</p>	<p>OGE accepts this change and adds the following question to the form: “I have a spouse who has paid employment outside of the Federal government.”</p>
<p><b>PART I: ASSETS and INCOME</b></p>		
<p>Comment received in prior renewal</p>	<p>OGE previously received comments that Part I should include a field that asks whether a reported interest had value below a certain threshold. One agency opined that it would provide additional clarity and perhaps negate a need for certain follow up questions.</p>	<p>OGE declines to make this change because the limited agency feedback indicated that the change is not useful.</p>
<p>OGE subject matter expert</p>	<p>OGE suggested adding an “excepted investment fund” field to Part I, which is similar to what currently exists on the OGE Form 278e (Parts 2, 5 and 6) to clarify whether an asset holds underlying assets. The rationale is to provide filers and agency reviewers with more clarity as to whether certain underlying assets need to be reported.</p>	<p>OGE declines to make this change and firmly believes, following extensive discussion with the agencies, that it would not provide greater clarity, ease of review, or understanding for filers or agency reviewers.</p>
<p>Agency written comments and comments received during public and agency sessions</p>	<p>OGE was asked to add more instructional guidance concerning treatment of reporting assets with underlying portfolios.</p>	<p>OGE accepts this change and adds examples to Part I. OGE also updates the examples on the existing “Examples” page.</p>

Agency written comments and comments received during public and agency sessions	OGE was asked to update the instructions in <b>Part I</b> to clarify how to report certain types of assets, including retirement accounts. The change would assist and reduce the burden for filers and agency reviewers.	OGE accepts these changes and updates and clarifies the instructions in Part I.  Additionally, OGE updates the <b>“Do and Do Not”</b> report instructions by: (1) moving certain types of assets to more prominent locations; (2) modernizing examples of sector funds; (3) clarifying “dependent child earned income”; and (4) clarifying that only non-federal retirement accounts are reportable.
Agency written comments and comments received during public and agency sessions	OGE was asked to clarify in the instructions that personally identifiable information (PII) is not reportable.	OGE accepts this change and clarifies that asset and income descriptions should not include account or social security numbers or names of family members.
<b>PART III: INSTRUCTIONS</b>		
Agency written comments and comments received during public and agency sessions	OGE was asked to move the word “Trust” in the instructions for Part III so that it would stand out to filers and agency reviewers. The rationale is that it would provide added clarity that an outside position with a trust is reportable.	OGE accepts this change and moves the word “Trust” to its own line item to highlight the need to report this outside position.
<b>PART V: INSTRUCTIONS and VALUE THRESHOLDS</b>		
OGE subject matter expert	An OGE subject matter expert suggested providing updated instructions and/or clarifying guidance as it applies to gifts and travel reimbursements. The rationale would be to make it clear that the thresholds identified apply to reports for calendar years 2023-2025.	OGE accepts this change and adds the following: <i>“These amounts apply to gifts and travel reimbursements received in calendar years 2023-2025. The next three-year adjustment to these amounts is scheduled to occur in 2026.”</i>