



**NUMBER:** Directive 0623

**SUBJECT:** Financial Disclosure Filing

**DIRECTIVE OWNER:** Office of the General Counsel, General Law Division

**EFFECTIVE DATE:** March 30, 2023

---

**1. PURPOSE.** To establish the procedures for Commission employees and officials (including nominees and appointees to Presidentially appointed, Senate-confirmed positions) who are required to submit public or confidential financial disclosure reports in accordance with the Ethics in Government Act and the regulations promulgated by U.S. Office of Government Ethics (OGE). The program of public and confidential financial disclosure is designed to identify potential conflicts of interest through a systematic review of the financial interests of employees and to prevent conflicts of interest on the part of Commission employees. Violation of the ethics laws and regulations may result in criminal and civil penalties.

**2. AUTHORITIES.**

- a. 5 U.S.C. § 13103, et seq. (Ethics in Government Act of 1978, as amended)
- b. 18 U.S.C. § 208 (Acts Affecting a Personal Financial Interest)
- c. Pub. L. No. 112-105, as amended (Stop Trading on Congressional Knowledge Act, or STOCK Act)
- d. Executive Order 13989, *Ethics Commitments by Executive Branch Appointees* (Jan. 20, 2021) (Ethics Pledge)
- e. 5 C.F.R. Part 2634 (Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture)
- f. 5 C.F.R. Part 2635 (Standards of Ethical Conduct for Employees of the Executive Branch or Standards of Conduct)
- g. 5 C.F.R. Part 2638 (Executive Branch Ethics Program)
- h. 5 C.F.R. § 8101 (Supplemental Standards of Ethical Conduct for Employees of the Consumer Product Safety Commission)



3. **SCOPE.** This Directive applies to all employees required to file a public financial disclosure report or a confidential financial disclosure report.

#### 4. **PUBLIC FINANCIAL DISCLOSURE PROGRAM**

- a. **Principles.** Employees may not hold or acquire financial interests that conflict substantially, or appear to conflict substantially, with their government duties and responsibilities. The financial interests of a spouse or minor child are considered the financial interests of the employee. An employee having a substantial conflict of interest will be required to resolve the conflict.

Employees are prohibited by criminal statute, 18 U.S.C. § 208(a), from participating personally and substantially in an official capacity in any particular matter in which, to their knowledge, they (or any person whose interests are imputed to them) have a financial interest, if the particular matter will have a direct and predictable effect on that interest.

- b. **Filers.** The following employees, whether permanent or serving in an acting capacity, who could reasonably be expected to perform the duties of such a position for more than 60 days in a calendar year, are required to file public financial disclosure reports pursuant to the Ethics in Government Act, as amended, and 5 C.F.R. part 2634:

- (1) The Chair;

- (2) Each Commissioner;

- (3) Each employee, including a special government employee, who is in a position:

- (a) classified as a position within the Senior Executive Service (SES);

- (b) classified above the GS-15 grade of the General Schedule; or

- (c) the rate of basic pay for which is fixed (other than under the General Schedule) at a rate equal to or greater than 120 percent of the minimum rate of basic pay for a GS-15 of the General Schedule;

- (4) Each employee, regardless of grade or pay level, who is in a position that is excepted from the competitive service by reason of being of a confidential or policymaking character (Schedule C employees);

- (a) Exception: Individuals in any Schedule C position classified at GS-15 or below who have no policymaking role with respect to agency programs, may be



excluded from filing a public report pursuant to 5 C.F.R. § 2634.203, subject to the determination of the Director of OGE;

(5) The Designated Agency Ethics Official (DAEO).

**c. Types of Reports, Deadlines, and Fees.** Public financial disclosure reports must be filed on the forms prescribed by OGE (Form 278e, Executive Branch Personnel Public Financial Disclosure Report, and 278-T, Periodic Transaction Report) through the Integrity database system and in accordance with the regulations promulgated by OGE. There are 5 types of reports:

- (1) **Annual Reports.** Filed by incumbents each year on or before May 15, by all public filers who perform their responsibilities for more than 60 days in the calendar year.
- (2) **New Entrant Reports.** Filed by individuals within 30 days of assuming a position that is required to file a public financial disclosure report. Unless:
  - (a) The new entrant left another position where filing was required fewer than 30 days before assuming the position at CPSC; or
  - (b) The new entrant has already filed a nominee report.
- (3) **Nominee Reports.** Filed by individuals nominated to the position of Commissioner or Chair after a public announcement by the President (or President-elect) but no less than 5 days after the transmittal of the nomination to the Senate.
- (4) **Termination Reports.** Filed by a public filer leaving the Commission no more than 15 days before termination and no more than 30 days after termination of employment. If the public filer files before departing, the filer must update the report with any changes before termination. If the individual departs to assume another position where a public report is required, the filer does not have to file a termination report.
- (5) **Periodic Transaction Reports.** A public filer must file a transaction report within 30 days of receiving notification of a covered transaction but not later than 45 days after such transaction. A covered transaction is any purchase, sale, or exchange in which the transaction exceeds \$1,000 with the exception of:
  - (a) Transactions between the filer and his or her spouse or dependent children;
  - (b) Transactions of “excepted investment funds,” as defined at 5 C.F.R. § 2634.312(c);



- (c) Transactions involving Treasury bills, notes, and bonds; money market mutual funds or accounts; and bank accounts;
  - (d) Transactions involving holdings of trusts and investment funds, described at 5 C.F.R. § 2634.312(b)–(c); and
  - (e) Transactions that occurred when the filer was not a public financial disclosure filer.
- (6) **Filing Extensions.** Ethics officials may, for good cause, grant an extension of up to 45 days to any public filer. Ethics officials may, for good cause, grant an additional extension, which must not exceed 45 days. The filer must make the request in writing and state why an extension is necessary. The ethics official must approve or deny extension requests in writing. An extension request and the decision are maintained as part of the official report file. Filers who are serving in the Armed Forces in a combat zone will have the filing deadline automatically extended.
- (7) **Late Filing Fee.** Any individual who files a public report more than 30 days late is required by statute to pay a late filing fee of \$200. The DAEO shall collect the fee and forward it to the U.S. Treasury for deposit as miscellaneous receipts, or the employee may pay Treasury directly by using [pay.gov](https://www.pay.gov) and showing the DAEO a record of the payment. The DAEO may waive the late filing fee by determining that the delay in filing was caused by extraordinary circumstances that made the delay reasonably necessary. An employee must request a waiver in writing and the DAEO's response must be in writing; both documents must be maintained as part of the official report file. If the filer fails to remit the \$200 fee, he or she will be subject to agency debt collection procedures. The filer may also be subject to other sanctions, including referral to the Attorney General.
- (8) **Penalties.** The Attorney General may bring a civil or criminal action, or both, against any individual who knowingly and willfully falsifies or fails to file or report any information required to be reported on the public financial disclosure reporting form. In addition, the Commission may take appropriate disciplinary action in accordance with applicable law or regulation against any individual for failing to file a report, filing late, or for falsifying or failing to report required information.
- d. **Financial Disclosure Counseling.** The DAEO, the Alternate Designated Agency Ethics Official (ADAEO), and ethics officials serve as the primary advisors on matters covered by the financial disclosure laws and regulations. They provide advice and guidance to employees, as needed, to assist them in complying with the requirements of ethics laws and regulations. Employees may contact individual ethics officials or email [ethics@cpsc.gov](mailto:ethics@cpsc.gov), at any time to request advice regarding conflicts of interest and financial disclosure.



- e. Procedure for Filers.** All public financial disclosure reports must be filed in OGE's executive branch-wide electronic filing system, Integrity, available at [www.integrity.gov](http://www.integrity.gov). Once a filer submits the 278e in Integrity, the report has been filed. Paper reports will not be accepted, except in extraordinary circumstances. The reporting periods, which vary by type of report, are outlined at 5 C.F.R. § 2634.310.
- (1) **Annual filers.** Ethics officials will inform public financial disclosure filers of their annual obligation to file and provide any updated information no less than 30 days before the annual May 15 filing date, and preferably earlier. Such notice will be provided via email with a link to the form.
  - (2) **New entrants.** Ethics officials will inform new entrant filers of their filing obligation within 10 days of their entry on duty. Such notice will be provided by email with directions about establishing an account and accessing Integrity for the first time.
  - (3) **Nominees.** Nominees' forms are initiated by OGE, not CPSC. However, ethics officials at CPSC will work directly with nominees to complete their reports.
  - (4) **Termination filers.** As soon as they are notified by EXRM of a filer's departure date, ethics officials will inform departing employees of their obligations to file a termination report. Ethics officials will determine whether the departing employee needs to file a combination annual/termination report. Notice will be provided via email with a link to the form. Ethics officials will also ensure that departed employees continue to have access to the Integrity system if they do not complete their termination report before their departure.
  - (5) **Transaction reports.** Public financial disclosure filers must initiate the 278-T form in Integrity whenever they make a covered financial transaction or become aware that a transaction has been made on their behalf. Ethics officials are available to assist in this process, if necessary.
- f. Procedure for Reviewers.** The DAEO or ADAEO assigns each filer to an agency ethics official, who is responsible for reviewing that filer's submissions (278e and 278-T). The Integrity system notifies ethics officials when reports are filed.
- (1) Within 60 days after submission by the filer, ethics officials will review each public financial disclosure report for completeness and accuracy, as well as for potential conflicts of interest as defined in law, rule, regulation, and agency policy.
  - (2) The ethics official will confer with the filer if the report is incomplete or ambiguous, raises conflict of interest issues, or is inconsistent within the report or with prior reports.



- (3) The ethics official will review each public financial disclosure report to determine whether a real or potential conflict of interest exists between the filer's financial interests and their duties as a public employee.
  - (4) The ethics official will conduct independent research into the filer's interests, as appropriate, to determine whether the interest is or could be a prohibited source for employees of the Commission.
  - (5) If the ethics official determines that there are no conflicts of interest under applicable laws and regulations, he or she will affirm that determination and forward the report for further review by the DAEO or ADAEO.
  - (6) If the ethics official determines that there is a conflict of interest, he or she will discuss the matter with the filer, and seek resolution of the matter, as may be appropriate. The report will not be certified until the conflict has been resolved.
  - (7) The DAEO or ADEAO will certify the determination of the ethics official after conducting the second-level review.
  - (8) The certifying official (usually the ADAEO) will issue Cautionary Advice to the filer if the filer has assets that present potential conflict of issue concerns.
  - (9) The Chair or ADAEO will review and certify the report of the DAEO.
  - (10) Reports submitted by the Chair, Commissioners, and the DAEO will be further reviewed by OGE, which is the final certifying official for those individuals.
- g. Resolution of Conflicts of Interest (Remedial Action).** Except in unusual circumstances, any conflict of interest must be resolved within 3 months of the filer receiving notice that action is required. There are 5 ways to resolve actual and apparent conflicts of interest:
- (1) **Recusal.** A conflict is resolved through recusal when the filer agrees to refrain from participating personally and substantially in a particular matter in which he or she has a financial interest.
  - (2) **Divestiture.** Divestiture is required when the ethics officials determine that a particular interest is so intertwined with the filer's responsibilities that it cannot be resolved by recusal. Ethics officials will work with the filer to minimize, to the extent possible, the divestiture's impact on an individual's finances pursuant to 5 C.F.R. Subpart J—Certificates of Divestiture.



- (3) **Resignation from outside activities or interests.** Resignation is required when the ethics officials determine that the outside activities or interests are too intertwined with the filer's responsibilities and cannot be resolved by recusal.
  - (4) **Waiver.** In unusual and rare circumstances, the DAEO may issue a written waiver in accordance with 18 U.S.C. § 208(b)(1), stating that the interest is not substantial enough to be deemed likely to affect the integrity of the services that the government may expect from the filer. Without such a waiver, the filer cannot participate in the particular matter.
  - (5) **Qualified Trusts.** There are two types of qualified trusts that may be used by employees to reduce real or apparent conflicts of interest: a qualified blind trust and a qualified diversified trust. Individuals who wish to establish a qualified trust to avoid a conflict of interest should consult with the DAEO. Such qualified trusts must be established in accordance with the Ethics in Government Act, as amended, and OGE regulations set forth in 5 C.F.R. Part 2634, Subpart D—Qualified Trusts, and Subpart E—Revocation of Trust Certificates and Trustee Approvals.
- h. Ethics Agreements.** An Ethics Agreement is any oral or written promise by a reporting individual to undertake specific actions to alleviate a real or apparent conflict of interest. The Ethics Agreement may contain any or all of the five methods of resolving actual and apparent conflicts of interest.
- (1) Ethics officials will work with every nominee and OGE to draft the nominee's Ethics Agreement during the nominations process in accordance with the OGE regulations set forth at 5 C.F.R. Part 2634, Subpart H—Ethics Agreements.
  - (2) Ethics officials will continue to provide updates to OGE regarding a nominee's compliance with the Ethics Agreement once the nominee becomes a Commissioner or Chair.
  - (3) Filers needing to resolve conflicts may or may not need to file a formal Ethics Agreement. Most filers may recuse by notifying ethics officials and/or their supervisor(s) via email or orally.
  - (4) Records of ethics agreements and evidence of any action taken to comply with such ethics agreements shall be maintained with the individual's financial disclosure reports.
- i. Referrals for Noncompliance or Falsification.** The Chair must make a referral to the Attorney General when there is reasonable cause to believe that an individual has willfully failed to file a public financial disclosure report or has willfully omitted or falsified any information required on the report.



- (1) Ethics officials will work with the Office of Inspector General whenever falsification is suspected.
- (2) Filers who file their financial disclosures report more than 30 days after the deadline (including extensions), must remit a late filing fee of \$200 payable to the U.S. Treasurer in accordance with section 4(c)(7) above. Failure to comply may be grounds for referral to the Inspector General or the Attorney General.
- (3) The Attorney General has the authority to bring civil or criminal actions against employees who are not compliant with their financial disclosure obligations or who refuse to resolve conflicts of interest as recommended by the DAEO.

**j. Custody of and Access to Public Reports.** All public financial disclosure reports will be maintained in the Integrity financial disclosure system controlled and managed by OGE.

- (1) Within 30 days after the filer files a public financial disclosure report, the report will become available to the public in accordance with 5 C.F.R. § 2634.603.
- (2) Requests for public financial disclosure reports must be submitted on OGE Form 201 to the agency or, as appropriate, OGE. It is unlawful for any person to obtain or use a public financial disclosure report:
  - (a) For any unlawful purpose;
  - (b) For any commercial purpose, other than by news and communications media for dissemination to the general public;
  - (c) For determining or establishing the credit rating of any individual; or
  - (d) For use, directly or indirectly, in the solicitation of money for any political, charitable, or other purpose.
  - (e) Any person who obtains or uses a report for any purpose prohibited by this section may be subject to a civil action brought by the Attorney General. This remedy shall be in addition to any other remedy available under statutory or common law.
- (3) Public financial disclosure reports will remain available to the public for a period of six years after filing. After the six year period, reports will be destroyed, unless needed in an ongoing investigation, or as otherwise provided by statute or regulation.





- (4) A qualified trust agreement, the list of assets initially placed in the trust, and all other publicly available documents relating to the trust shall be made available to the public and retained on the same retention schedule as a filer's financial disclosure report.

## **5. CONFIDENTIAL FINANCIAL DISCLOSURE PROGRAM**

- a. Principles.** An employee may not hold or acquire a financial interest that conflicts substantially, or appears to conflict substantially, with his or her government duties and responsibilities. The financial interests of a spouse or dependent child are considered the financial interests of the employee. An employee having a substantial conflict of interest will be required to resolve the conflict.

Employees are prohibited by criminal statute, 18 U.S.C. § 208(a), from participating personally and substantially in an official capacity in any particular matter in which, to their knowledge, they (or any person whose interests are imputed to them under the statute) have a financial interest, if the particular matter will have a direct and predictable effect on that interest.

- b. Confidentiality.** Confidential financial disclosure reports are confidential. No member of the public will have access to such reports, except under order of a federal court, or as otherwise provided under the Privacy Act. Confidential financial disclosure reports are exempt from disclosure under the Freedom of Information Act (FOIA).
- c. Filers.** Employees who are in a position designated in Section 6 of this Directive, whether permanent or serving in an acting capacity, must file a confidential financial disclosure report. Only employees reasonably expected to perform the duties of such a position for more than 60 days in any calendar year are required to file.

- (1) Confidential filers include employees at GS-15 or below, whose positions require them to participate personally and substantially, through decision or the exercise of significant judgment, and without substantial supervision and review, in taking a government action regarding:

- (a) Contracting or procurement;
- (b) Regulating or auditing any non-federal entity; or
- (c) Other activities in which the final decision or action will have a direct and substantial economic effect on the interests of any non-federal entity.

- (2) Confidential filers also include employees whose duties and responsibilities require the employee to file to avoid real or apparent conflicts of interest, or to carry out the



purposes of any statute, including duties and responsibilities that involve investigating or prosecuting violations of criminal or civil law.

- (3) Any employee may be excluded from the confidential reporting requirements when the agency head or designee determines that the duties of a position make remote the possibility that the incumbent will be involved in a real or apparent conflict of interest.
- (4) An employee's request to be excluded must be made in writing. The request will be retained by the DAEO.
- (5) Employees may file a complaint with the DAEO asserting that their position has been improperly included with those requiring confidential reporting. A decision by the DAEO on such complaint shall be final.

**d. Report Form, Deadlines, and Administrative or Disciplinary Remedies.** Confidential financial disclosure reports must be filed on the electronic data collection system used by CPSC (currently FDOOnline), which provides an electronic version of the form required by the Office of Government Ethics (OGE Form 450). Copies of the current form are available online at the Office of Government Ethics website, [www.oge.gov](http://www.oge.gov), in the forms library.

- (1) Annual confidential financial disclosure reports are due each year by February 15.
- (2) New entrants (including employees promoted or detailed to a listed position for more than 60 days in a calendar year) must file a new entrant report not later than 30 days after assuming the position.
- (3) Termination reports are not required for individuals leaving CPSC.
- (4) Filing extensions may be granted by ethics officials for good cause, with the total time of the extensions not to exceed 90 days.
- (5) Any individual who fails to file a confidential financial disclosure report shall be subject to administrative remedies pursuant to 5 C.F.R. § 2634.701(d).
- (6) The Attorney General may bring a civil or criminal action, or both, against any individual who knowingly and willfully falsifies any information on the confidential financial reporting form. In addition, the Commission may take appropriate disciplinary action in accordance with applicable law or regulation against any individual who falsifies information.



- e. Procedure for Filers.** All confidential financial disclosure reports must be filed in CPSC's electronic system, which is currently FDOonline. Once a filer submits OGE Form 450 online, the report has been filed. Paper reports will not be accepted, except in extraordinary circumstances.
- (1) **Annual filers.** Ethics officials will inform confidential financial disclosure filers of their annual obligation to file and provide any updated information no less than 30 days before the annual February 15 filing date. Notice will be provided via email with a link to the filer's form in the electronic system.
  - (2) **New entrants.** Ethics officials will inform new entrant filers of their filing obligation within 10 days of their entry on duty. Notice will be provided by email with directions about establishing an account and accessing the electronic system for the first time.
- f. Procedure for Reviewers.** The ADEAO assigns each filer to an ethics official, who is responsible for reviewing that filer's submissions.
- (1) Within 60 days after receipt, ethics officials will review every confidential financial disclosure report for completeness and accuracy, as well as for potential conflicts of interest as defined in law, rule, regulation, and agency policy.
  - (2) The ethics official will confer with the filer if the report is incomplete or ambiguous, raises conflict-of-interest issues, or is inconsistent within the report or with prior reports.
  - (3) The ethics official will review each confidential financial disclosure report to determine whether the filer has a real or potential conflict of interest between their financial interests and their duties as a public employee.
  - (4) The ethics official will conduct independent research into the filer's interests, as appropriate, to determine whether the interest is, or could be, a prohibited source for employees of the Commission.
  - (5) If the ethics official determines that there are no conflicts of interest under applicable laws and regulations, he or she will affirm that determination and forward the report for further review by the DAEO or ADAEO.
  - (6) If the ethics official determines that there is a conflict of interest, he or she will discuss the matter with the filer and seek resolution of the matter, as may be appropriate. The report will not be certified until the conflict has been resolved.
  - (7) The DAEO or ADEAO will certify the determination of the ethics official after conducting the second-level review.



(8) The certifying official will issue Cautionary Advice to the filer if the filer has assets that present potential conflict-of-issue concerns.

**g. Resolution of Conflicts of Interest (Remedial Action).** Except in unusual circumstances, any conflict of interest must be resolved within 3 months of the filer receiving notice that action is required. There are 5 ways to resolve actual and apparent conflicts of interest:

(1) **Recusal.** A conflict is resolved through recusal when the filer agrees to refrain from participating personally and substantially in a particular matter in which he or she has a financial interest.

(2) **Divestiture.** Divestiture is required when the ethics officials determine that a particular interest is so intertwined with the filer's responsibilities that it cannot be resolved by recusal. Ethics officials will work with the filer, to the extent possible, to minimize the divestiture's impact on an individual's finances pursuant to 5 C.F.R. Subpart J—Certificates of Divestiture.

(3) **Resignation from outside activities or interests.** Resignation is required when the ethics officials determine that the outside activities or interests are too intertwined with the filer's responsibilities and cannot be resolved by recusal.

(4) **Waiver.** In unusual and rare circumstances, the DAEO may issue a written waiver in accordance with 18 U.S.C. § 208(b)(1) stating that the interest is not substantial enough to be deemed likely to affect the integrity of the services that the government may expect from the filer. Without a waiver, the filer cannot participate in the particular matter.

(5) **Qualified Trusts.** There are 2 types of qualified trusts that may be used by employees to reduce real or apparent conflicts of interest: a qualified blind trust and a qualified diversified trust. Individuals who wish to establish a qualified trust to avoid a conflict of interest should consult with the DAEO. Qualified trusts must be established in accordance with the Ethics in Government Act, as amended, and OGE regulations set forth in 5 C.F.R. Part 2634, Subpart D—Qualified Trusts, and Subpart E—Revocation of Trust Certificates and Trustee Approvals.

**h. Ethics Agreements.** An ethics agreement is any oral or written promise by a reporting individual to undertake specific actions to alleviate a real or apparent conflict of interest. The Ethics Agreement may contain any or all of the 5 methods of resolving actual and apparent conflicts of interest.



- (1) Filers needing to resolve conflicts through 1 of the 5 methods may or may not need to file a formal Ethics Agreement. Most filers may recuse themselves by notifying ethics officials via email or orally.
  - (2) Records of ethics agreements and evidence of any action taken to comply with such ethics agreements shall be maintained with the individual's financial disclosure reports.
- i. Referrals for Noncompliance or Falsification.** The Chair must make a referral to the Attorney General when there is reasonable cause to believe that an individual has willfully falsified any information required on the report.
- (1) Ethics officials will work with the Office of Inspector General whenever falsification is suspected.
  - (2) The Attorney General has the authority to bring civil or criminal actions against employees who are not compliant with their financial disclosure obligations or who refuse to resolve conflicts of interest as recommended by the DAEO.
- j. Custody of Confidential Financial Disclosure Reports.** All confidential financial disclosure reports will be maintained in the electronic financial disclosure system. Confidential financial disclosure reports will be retained for a period of 6 years after filing. After the 6-year period, reports will be destroyed, unless needed in an ongoing investigation, or as otherwise provided by statute or regulation.

## **6. EMPLOYEE POSITIONS SUBJECT TO CONFIDENTIAL FINANCIAL DISCLOSURE REPORTING**

- a.** The following offices report to the Chair of the Commission:

**Office of Equal Employment Opportunity, Diversity and Inclusion (OEEODI)**

Required Filers: All GS-15 positions

**Office of the Executive Director (EX)**

Required Filers:

- All special assistants
- The Small Business Ombudsman (SBO)

**Office of General Counsel (GC)**

Required Filers:

- The Commission Secretary
- All Assistant General Counsels



- All attorneys in GCFL
- All special assistants
- All senior counsels

**Office of Communications (CM)**

Required Filers: Deputy Director

- b. The following offices report to the Executive Director of the Commission:

**Office of Compliance and Field Operations (EXC)**

(EXC, CFI, CEL, CRE, CRM)

Required Filers:

- All directors, supervisors, compliance officers, and investigators
- All administrative officers GS-13 and above

**Office of Import Surveillance (EXIS)**

Required Filers:

- All directors, supervisors, compliance investigators, compliance inspectors, trade specialists, management and operations research analysts
- All administrative officers GS-13 and above

**Office of Hazard Identification and Reduction (EXHR)**

(EC, ES, EP, HS, LS)

Required Filers: All positions except administrative personnel

**Office of Human Resources Management (EXRM)**

Required Filers:

- All supervisors
- Security Officer

**Office of Information and Technology Services (EXIT)**

Required Filers: All GS-14 and GS-15 positions

**Office of Financial Management, Planning and Evaluation (EXFM)**

(FMPB, FMPS, FMFS)

Required Filers:

- All GS-15 positions
- All warranted contracting officers
- All contract specialists

**Office of Facilities Services (EXFS)**

Required Filers: Director



7. **CANCELLATION:** This Directive supersedes and cancels IP311-A, *Implementing Procedure for Financial Disclosure Program (Ethics Program)* (Aug. 26, 2019).

A handwritten signature in black ink, appearing to read "Alex H. Saric", written over a horizontal line.

Alexander Hoehn-Saric  
Chair

3/30/2023

\_\_\_\_\_  
Date