

HOW TO REVIEW AN OGE 450 FORM (Guidance for Executive Directors and Secretaries)

WHAT IS THE PURPOSE OF A FINANCIAL DISCLOSURE FORM?

The purpose is to identify potential conflicts of interest between an SGE's personal financial interests (like the SGE's employment or investments or board service) and the subject matter of the Advisory Committee.

Your job as an Executive Secretary is to review the form as a "Supervisor/Other Intermediate Reviewer" so you can annotate any potential conflicts for the attorney's final review.

HOW CAN SGEs FILE A FORM IN 2012?

They can file **electronically** in the secure, web-based Ethics Program Tracking System (EPTS) or in **paper form** that they mail in to the NSSC.

HOW WILL I BE NOTIFIED TO REVIEW A FINANCIAL DISCLOSURE FORM?

When an SGE files a form, you should get notification that there is a new form in your EPTS "Review Forms" queue to review. You will be notified immediately if the SGE files electronically but will not be notified to review a paper form until the form is received in the mail by the NSSC and scanned into EPTS.

HOW DO I LOG INTO EPTS TO REVIEW THE FORM?

To access the form for review, you can click on the link to the form in the email, or access EPTS at <https://eptsadmin.nssc.nasa.gov>. There is also a link to EPTS in the "Applications" Tab of the "Inside NASA Headquarters" webpage: <http://www.hq.nasa.gov/hq/applications.html>.

To review forms onsite, you should be e-authenticated to EPTS and do not have to enter a separate ID and password. To review forms offsite, you will need VPN or SNA access and a token, and will log in with your Launchpad Agency User ID and Password. If you review the form offsite, make sure that no one else is in a position to see the information on the form. This is sensitive financial information and must be protected.

HOW DO I REVIEW AN ELECTRONIC OGE-450 FORM?

1. After logging in to EPTS, you should be taken automatically to your "Review Forms" queue which shows you a list of 450 forms to review.
2. Select the name of an SGE to access their form and then review the form.
3. Make a note of any potential conflicts in the comments box and "save."
4. Sign the form electronically with your Launchpad Agency User ID and Password.
5. After you sign the form, the EPTS system will automatically route the form to the attorney (Final Reviewing Officer) queue for final review.

HOW DO I REVIEW A PAPER OGE-450 FORM?

1. After you access EPTS, you should be taken automatically to your “Review Forms” queue which shows you a list of forms to review.
2. Select the name of an SGE to access their record under the “Forms Administration” tab. Once there, you can click on the “2012 OGE-450 Form” link in red at the top of the page. This link will take you to the PDF paper form that the NSSC scanned into EPTS.
3. Print out the form in hard copy.
4. Put the form into a folder with a yellow SBU sheet on top. (You need to do this because this is sensitive financial information. You should lock up the form for safekeeping at any time that you are away from the your office.)
5. Review the form, noting any potential conflicts of interest in the comments block.
6. Sign and date the form in ink as the “intermediate/supervisory reviewer”.
7. Check to see if the SGE filled in the name of your Advisory Committee and checked the SGE box on the form. If not, please write it on the paper form and check the SGE box.
8. Under the Forms Administration tab, search for the SGEs record.
9. Go back to the SGE’s record under the “Forms Administration” Tab. **Put the date in the box that says “Supervisor Signed date.”** (This is necessary for the EPTS system to reflect that you completed the review.)
10. Take the paper form to the OGC Ethics Team paralegal, Angela Davis, in Room 9X26 to log in.
 - Be sure the form is in a folder with the yellow SBU sheet on top.
 - Make sure that the name of the Committee is on the form (either entered by the SGE or by you) and that the SGE box is checked.
 - You may want to call ahead to see if Angela is in the office. Her number is: X3053.
 - Do not leave the form on Angela’s desk or in-box if she is not there.
 - Do not leave the form with anyone except Angela, because she needs to log it in to assign for attorney review.

WHAT DOES THE ETHICS ATTORNEY DO WITH THE PAPER OGE 450 FORM?

After completing the review of the form, the Ethics Attorney will send in the final copy of the paper OGE 450 form (with both your and the attorney's signatures and dates) to the NSSC to scan back into the SGE's record.

If the Ethics Attorney would like to point out any potential conflicts of interest, he or she will email the SGE a "cautionary letter" and send a copy to the Executive Secretary.

HOW WOULD I FIND A CAUTIONARY LETTER OR OGE 450 FORM LATER?

1. Log into EPTS at <https://eptsadmin.nssc.nasa.gov> .
2. Go to the "Forms Administration" Tab at the top.
3. Search for the SGE by name and click on the link.
4. In the SGE's record, click on the red link that says "2012 OGE-450 Form" to access a PDF of the signed 450 form.
5. Click on the link to "View Cautionary Letter History" to see all cautionary letters that have been sent to the SGE.

It is recommended that you review the cautionary letters and/or OGE 450 forms before your meetings as you prepare the agenda to refresh your memory on any potential conflicts the SGEs might have with the subject matter of that meeting. You should alert an Ethics Attorney if there is such a potential conflict and see if it is advisable to recommend recusal to the SGE for that portion of the agenda.

HOW CAN I CHECK ON THE STATUS OF THE REVIEW OF A FORM?

1. Log into EPTS at <https://eptsadmin.nssc.nasa.gov> .
2. Go to the "Reports" tab.
3. Scroll down to "Committee Reports."
4. Choose your Committee in the drop-down box and run the report.
5. The Report will reflect the status of review in the "Form Status" field:
 - "New" means the employee has not yet filed (and there will be no date in the "Employee sign date" field.)
 - "Awaiting Supervisor Signature" means the Executive Secretary has not completed the supervisory/intermediate review of the form.
 - "Supervisor signed – sending to NSSC" means that the Supervisor (Executive Secretary) has completed the review of a paper form.
 - "Awaiting Final Reviewing Officer" means that the Ethics Attorney has not yet completed the review of the form
 - "Final Reviewing Officer signed – sending to NSSC" means that the Ethics Attorney has completed the review of a paper copy and is sending the form to the NSSC to scan in.
 - "Completed" means that all review has been completed on that form.

Note that this committee report will also tell you (if you have recorded the training dates) which SGEs need to take make-up ethics training for 2012. If you have not yet recorded the training dates, please see the handout for Executive Secretaries on SGE training.