



A Publication of the  
Office of Government Ethics  
for the Executive Branch

Fall 1995 Vol. 12 No. 3

Government

# Ethics Newsgram

## Proposed Changes to 18 U.S.C. § 208

On September 11, 1995, OGE published a proposed regulation describing circumstances under which employee financial interests would be exempt from the prohibition in 18 U.S.C. § 208(a). See 60 *Federal Register* 47208-47233 (September 11, 1995.) Section 208(a) bars employees from acting in an official capacity in matters affecting personal financial interests. Section 208(b)(2) of title 18 authorizes OGE to establish executive branchwide exceptions or exemptions to the prohibition.

The proposed regulation contains a listing of exemptions that relate to commonly-held assets and interests such as mutual funds and pensions, as well as exemptions for matters affecting companies or other entities in which an employee owns de minimis amounts of securities, including stocks and bonds. Additionally, the proposed regulation includes a variety of  
*Continued on page 2 column 3*



Judge Abner Mikva gives the Keynote Address.

## Annual Ethics Conference

Over 450 ethics officials attended this year's Government Ethics Conference in Williamsburg, Virginia. The theme was "Ethics in an Era of Change." Judge Abner Mikva, then-Counsel to the President, was the keynote speaker. Brooks Jackson from CNN addressed a plenary session on the topic "Ethics of the Press: Are We Any Better?" Dr. Rushworth Kidder from The Institute for Global Ethics spoke to the assembled ethics officials and presented an Ethical Fitness Seminar (see article on page 2). Dr. Edward S. Petry, Executive Director of the National Ethics Officer Association, spoke to conference attendees about ethics situations in private industry, discussing two specific examples from the private sector. Videotapes of the plenary sessions are available for viewing in the Ethics Information Center at OGE.

As in past conferences, participants attended a variety of concurrent sessions. A few of the 38 topics included partnerships, privatization, non-Federally funded travel, and professional associations.

Several sessions were presented twice to allow more participants to learn about "hot" topics. Participants were free to select any of the 90-minute sessions that interested them during the five session times.

Other events included a technology demonstration and a "Meet Your Desk Officer" forum. Gabe Paone, Department of Interior (DOI), presented DOI's reinventing ethics ideas. Jack Kress, DAEO at Department of Health and Human Services, led a panel of three who formerly served in the White House Counsel's Office on the topic "Do Ethics Rules Help or Hinder Effective Government?" The final morning of the conference, OGE presented "OGE Program Managers Update" to inform everyone about OGE projects.



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## Director Potts Appointed for Second Term

As I reflect on my first term as Director of OGE, I realize how much the ethics program of the executive branch has developed. As a partner in the ethics community, I take pride in the strides that we have made over the past five years. Your enthusiastic support and dedication have been critical to our successes.

Over the years, the role of ethics practitioners has become increasingly important to your client agencies as they are faced with heightened scrutiny. You are viewed as the gate keeper of the public trust: responsible for maintaining the highest level of ethical service to our country.

Today, the Federal workforce faces new challenges. We must operate within the reality of diminished budgets, of agency downsizing, and of privatization of many Government programs. These reforms in the administration of Government present challenges to us all. We must remember, though, that ethical service is a constant, and that we must carry out our duties with the same impartiality as before.



*Stephen D. Potts takes Oath as Director of OGE*

I pledge my continued support to you, the ethics officers, during my second term as Director. I look forward to building upon our solid body of past accomplishments. Together, we can work to ensure that every citizen will have complete confidence in the integrity of the Federal Government as we enter the 21st century.

## Ethical Fitness

With all the emphasis these days on *physical* fitness, have you stopped to consider your *ethical* fitness? If not, then Rushworth Kidder's Ethical Fitness Seminar may "get you into shape."

Dr. Kidder addressed the 1995 Ethics Conference and presented an abbreviated version of his Ethical Fitness Seminar. "Exercises" centered around two topics — core values and ethical dilemmas. Participants identified a list of moral values and then analyzed the list to select five core values that are identified time after time across cultures, countries, and religions: honesty, compassion, tolerance, responsibility, and fairness. Then, using real-life ethical dilemmas supplied by the seminar participants or drawn from Dr. Kidder's experience, participants discussed how to resolve these dilemmas which involved choosing between "right" and "right" values.

For example, consider this dilemma Dr. Kidder used during an OGE fitness session: A policeman arrives at an accident scene where a truck driver is pinned in his cab by a steel beam. The beam is piercing his body and he is severely injured but conscious. There is not enough time to free him from the wreckage because the rig is on fire and will soon explode. The driver begs the policeman, "Shoot me, shoot me." The policeman takes his gun from his holster and aims it at the driver. The driver is still pleading, "Shoot me. Please don't let me burn to death." What would you do? Which value would you choose — justice or mercy? When you are faced with an ethical dilemma you usually don't have time to carefully weigh all the alternatives. But being aware of core values and potential dilemmas will keep you "ethically fit."

## Proposed Changes

*continued from page 1*

miscellaneous exemptions that would apply only in particular situations or to particular groups of employees, such as special Government employees serving on advisory committees. Comments on the proposed rule were due November 13, 1995.

A related interim rule was published by OGE on August 28, 1995. The interim rule establishes a single exemption to the prohibition in section 208(a) for interests that arise from Government employment and from veteran or Social Security benefits. See 60 *Federal Register* 44706-44709 (August 28, 1995). Comments on the interim rule were due October 27, 1995.



## Government Ethics Newsgram

The **Government Ethics Newsgram** is published by the U.S. Office of Government Ethics, 1201 New York Avenue, NW., Suite 500, Washington, DC 20005-3917. Telephone 202-523-5757. TDD 202-523-1200. Fax 202-523-1251.

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We welcome any news and information related to Government ethics which you might wish to bring to the attention of OGE and the executive agencies as well as your candid critiques and suggestions. Quoting or reprinting materials contained in this publication is strongly encouraged and may be done without seeking OGE permission.

The Director of the Office of Government Ethics has determined that the publication of this periodical is necessary to the transaction of the public business of OGE, as required by law.

# Evaluation of Training Regulations

The Office of Government Ethics is currently engaged in an evaluation of its regulations governing Executive Agency Ethics Training Programs (Training Regulation), located at subpart G of 5 C.F.R. part 2638. One aspect of the Training Regulation that is likely to be changed is the requirement that each agency submit a written plan for annual ethics training to OGE by August 31 of each year. OGE believes that this requirement, while appropriate during the period when agencies were first establishing their annual ethics training programs, is no longer necessary in its current form. Accordingly, OGE did not require agencies to submit a written plan for annual ethics training to OGE for CY 1996.

*Agencies will still be required to develop annual agency ethics training plans and to maintain them at the agencies. When OGE's Program Review Division conducts a review of an agency's ethics program, it will verify that an*

agency has completed the required training plan for the calendar year in which the review occurs. Pending the completion of this evaluation of the Training Regulation, each agency's annual agency ethics training plan should include the items set forth in 5 C.F.R. § 2638.702(a)(3), as amended. See 59 *Federal Register* 12145 (March 16, 1994).

An agency should have its plan completed by January 1 of the calendar year covered by the plan. In developing its annual plan an agency should coordinate with OGE.

This may include: consulting with OGE concerning upcoming OGE training materials, including videotapes, that may be useful in administering the agency's training program; contacting OGE's Ethics Information Center to obtain



training materials from other executive branch agencies that may be adapted to the agency's needs; or consulting with OGE concerning other issues or problems the agency is facing in providing ethics training.

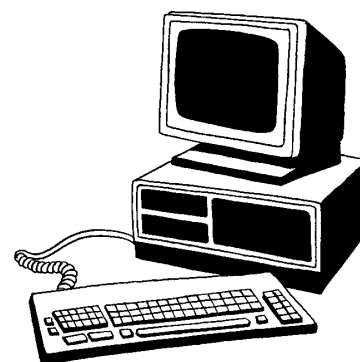
## TEBBS

OGE is pleased to provide The Ethics Bulletin Board System (TEBBS) as a service to the Government ethics community and to those members of the public interested in Government ethics. TEBBS provides information about ethics legislation, regulations, policies, opinions, and other Government ethics materials, including the Government Ethics Newsgram.

For global access to TEBBS, a user needs a personal computer, a modem, a telecommunications software package and a telephone line. TEBBS will accommodate baud rates ranging from 300 to 14,200. The modem settings are: full duplex; no parity; eight bit data length; one stop bit. The bulletin board supports multiple lines currently, with capacity for more as the need arises.

TEBBS is available 23 hours each day, seven days a week. It is unavailable from 7:00 a.m. to 8:00 a.m. Eastern Standard Time (EST), when routine maintenance is performed. For public access to TEBBS, call 202-523-1186.

User assistance for TEBBS is available from 8:00 a.m. until 4:00 p.m. EST, Monday through Friday (except Federal holidays) by calling Office of Information Resources Management at 202-523-5757.



## Satellite Broadcast for Partnership Agencies

The Ethics Trainers' Partnership satellite broadcast aired on October 5, 1995, to meet the annual ethics training requirement for employees of 15 executive branch agencies. This broadcast was an outstanding example of cooperation among Government agencies to provide training and conserve resources. An estimated 30,000 employees viewed the broadcast simultaneously and thousands more will view a video tape of the transmission before the end of the year. The total cost of the transmission was \$15,000.

Universal Training Task Force Chairman Dan Ross, General Services Administration, and the other task force members managed finances, content of the broadcast, scheduling, and presentation. Zina Pierre, Office of Personnel Management, served as moderator for the hour-long broadcast, introducing panels of experts on travel, ethics amendment issues, and seeking other employment and post

employment, and video-taped updates on current ethics issues. The session ended with a question and answer period for viewers to call or fax questions. The panelists followed up on a variety of questions received but not answered on the air.

### The 15 participating agencies included:

Corporation for National Service  
 Defense Logistics Agency  
 Department of Agriculture  
 Department of Interior  
 Federal Emergency Management Agency  
 General Services Administration  
 Health and Human Services  
 Internal Revenue Service  
 International Joint Commission  
 Nuclear Regulatory Commission  
 Office of Government Ethics  
 Office of Personnel Management  
 Social Security Administration  
 United States Postal Service  
 Veterans Administration

# U.S. Office of Government Ethics

## Publications

OGE publications may be ordered through the Government Printing Office (GPO), Superintendent of Documents' order line, 202-512-1800. Orders may also be faxed to 202-512-2250 but **only** if you pay by Visa, MasterCard, or Purchase Order.

◆ **"Standards of Ethical Conduct for Employees of the Executive Branch"** presents the Standards in an easy-to-read outline format. In addition, it has space on the back cover to record the names, telephone numbers and office addresses of agency ethics officials. Stock number: 052-003-01382-7. Price: \$6.00.

◆ **"Standards of Ethical Conduct for Employees of the Executive Branch"** is also available in Spanish. For further information contact Rhonda Curtis at OGE, 202-523-5757, ext. 1231.

◆ **"Informal Advisory Letters and Memoranda and Formal Opinions of the U.S. Office of Government Ethics 1979-1988"** collects all OGE opinions issued between 1979 and 1988. Stock number: 052-003-01172-7. Price: \$43.00.

◆ **"Supplement to the Informal Advisory Letters and Memoranda and Formal Opinions of the U.S. Office of Government Ethics 1991-1992"** includes OGE guidance issued in 1991 and 1992, a new index for the guidance issued from 1990 through 1992, and a corrected version of the index for the guidance issued from 1979 through 1989. Stock Number: 052-003-01363-1. Price: \$13.00.

◆ **"Supplement to the Informal Advisory Letters and Memoranda and Formal Opinions of the U.S. Office of Government Ethics 1993"** includes OGE guidance issued in 1993 and a new index for the guidance issued from 1990 through 1993. Stock Number: 052-003-01400-9. Price: \$8.50.

◆ **"Informal Advisory Letters and Memoranda and Formal Opinions of the U.S. Office of Government Ethics"** includes letters and memoranda issued by OGE in 1994, a new index covering guidance issued from 1990 through 1994, a new binder, and labels for the first two volumes of OGE guidance. Stock Number: 052-003-01437-8. At press time, order information was not yet available. Anticipated cost should not exceed \$15.00. For ordering information contact Rhonda Curtis at OGE, 202-523-5757, ext. 1231.

◆ **"Public Financial Disclosure: A Reviewer's Reference,"** a loose-leaf 300-page reference manual for reviewers of Standard Form 278, contains an introduction to the public financial disclosure system, the procedures and mechanics of review and conflict resolution, summaries of applicable ethics laws and regulations, sample SF 278 entries, model letters and documents related to the review process, and case studies. Stock number: 052-003-01365-7. Price: \$24.00.

## Posters

Posters may be ordered by contacting Karla Kunsemiller at 202-508-8462 and sending an SF-1 or purchase order to UNICOR Federal Prison Industries, Print Program Management, Attention: Karla Kunsemiller, 320 1st St., NW., Washington, DC 20534. Orders may also be faxed to 202-628-1897.

Posters are sold **only** in increments of 10. The order number is FPI-200396 for both posters; however, please **specify by name which poster you are ordering**. Shipment will be made 3 business days after receipt of the order. Estimate shipping costs to be approximately 15 percent of the total order.

Both posters are two-color on white coated text stock.

◆ **"Code of Ethics,"** a 12x18 inch poster, lists the 14 points of the Standards of Conduct. Price: \$26.50 for 10 posters.

◆ **"Ethics is the Cornerstone of Government Service,"** an 11x15 inch poster, symbolizes strength through ethics, and contains an allocated space for your agency to add the name and phone number of its DAEO. Price: \$21.50 for 10 posters.

## VHS Videotapes

All tapes may be ordered through the National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22161. Telephone sales desk: 703-487-4650. A shipping fee will be added to all orders. The amount of the fee is determined by the total value of your order.

◆ **"Integrity in Public Service: Earning the Public's Trust"** uses vignettes to briefly outline the statutes and regulations governing employee conduct. An on-screen narrator provides commentary on the vignettes to clarify particular points. This video is closed captioned and may be used either with an instructor present or as a stand-alone training tool. Twenty minutes in length. Order number: PB93-781342. Price: \$35.00.

◆ **"Guide to the Standards of Ethical Conduct"** is intended for use as an aid for ethics officials in educating themselves about the Standards of Ethical Conduct for Employees of the Executive Branch. It is divided into three sections, each of which summarizes the major provisions of a portion of the Standards. An accompanying study guide contains a brief summary of each subpart and rule. Fifty minutes in length. Order number: PB93-780005. Price: \$40.00.

An *audio* tape of the **"Guide to the Standards of Ethical Conduct"** is also available. Order number: PB93-781409. Price: \$12.50.

◆ **"The Ethical Choice: Ethics for Special Government Employees"** follows three Special Government

Employees (SGEs) through many of the ethical hurdles they face in the course of their Government service. While the videotape focuses on SGEs, it also addresses many of the rules applicable to all executive branch employees. Twenty minutes in length. Order number: AVA19673-VNB1. Price: \$45.00.

◆ **“Public Financial Disclosure: A Closer Look”** explores the need for high level executive branch officials to file a public financial disclosure report and emphasizes the importance of completing the report accurately and completely. Fifteen minutes in length. Order number: AVA 19788-VNB1. Price: \$40.00.

## Booklets

OGE booklets may be ordered through the Government Printing Office (GPO), Superintendent of Documents' order line, 202-512-1800. Orders may also be faxed to 202-512-2250 but **only** if you pay by Visa, MasterCard, or Purchase Order.

◆ **“Do It Right”** provides, in 35 pages, a detailed summary of the conflict of interest statutes and the standards of ethical conduct as they apply to executive branch employees. The booklet uses examples to promote reader comprehension. Stock number: 052-003-01359-2. Price: \$2.75.

◆ **“Take the High Road”** provides, in 22 pages, an intermediate level summary of the ethics laws and regulations. It uses a question-and-response format, as well as examples, to help the reader understand the material. Stock number: 052-003-01355-0. Price: \$2.25.

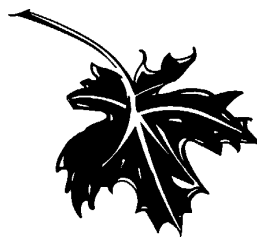
◆ **“A Brief Wrap on Ethics”** provides, in 20 pages, an easy-to-read, anecdotal treatment of some of the basic ethics laws and regulations. It uses simple examples.

## The Ethics CD-ROM

◆ **“The Ethics CD,”** October 1995 issue, is a multimedia searchable collection of Federal executive branch ethics laws, executive orders, regulations, advisory opinions, policy memoranda (DAEOgrams), Federal Register notices, and ethics program administration aids issued through September 30, 1995. It includes OGE publications: *A Brief Wrap on Ethics, Take the High Road, Do It Right*, and public and confidential financial disclosure review guides. It also includes the latest free OGE software for completing and printing the SF 450 confidential financial disclosure report.

The latest version includes preview sample video and audio clips from each of the four ethics videos: *The Ethical Choice: Ethics for Special Government Employees; Public Financial Disclosure: A Closer Look; Guide to the Standards of Ethical Conduct for Employees of the Executive Branch; and Integrity in Public Service: Earning the Public's Trust*. Each video lasts three to four minutes and includes complete ordering and pricing information. Although the CD-ROM is capable of running on either a DOS- or Windows-based personal computer, a Windows-based PC with a sound card is necessary to view the video clips. Stock number: 052-003-01434-3. Price: \$28.00

**Note:** “The Ethics CD,” October 1995, replaces the April 1995 edition.

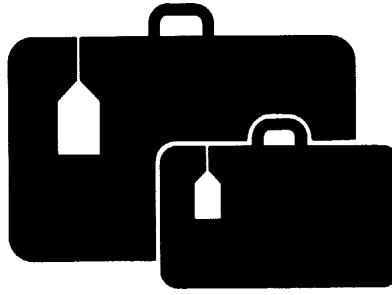


## Frequent Flyer Miles

In a November 30, 1994 decision, the Comptroller General of the United States reasserted that frequent flyer mileage credits obtained as a result of official travel are property of the Government. The Comptroller General affirmed, however, that in cases in which benefits derived from both personal and official travel are combined in one frequent flyer account, the employee may use personal mileage credits so long as adequate records clearly distinguish credits earned on personal travel from those earned on official travel.

### **Panama Canal Commission – Frequent Flyer Benefits – Commingling of Accounts**, B-257525, Nov. 30, 1994.

On behalf of his employees, the Administrator of the Panama Canal Commission (Commission) brought to the Comptroller General the question of personal use of frequent flyer credits. Aware of the long-standing rule requiring Federal employees to account for any gift, gratuity, or benefit received from a private source incident to official duty, the Administrator hoped to obtain an exception for employees of the Commission. The Administrator argued

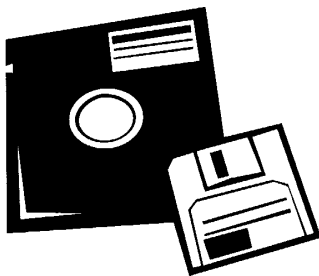


that the Commission is a self-sustaining entity, operating entirely from its own revenue, and therefore may not be subject to the rules pertaining to appropriated-fund agencies. Additionally, he argued, the Commission encourages its employees to schedule home leave to the continental United States coincident to official travel in order to keep the cost of home leave travel as low as possible. While on home leave, many employees travel at their own expense within the United States, combining benefits derived from personal and official travel in one frequent flyer account. The Administrator was concerned that all such mixed accounts would be considered Government property.

The Comptroller General ruled that while the Commission is financially self-sustaining, revolving funds are appropriated funds. The rules governing expenditures of appropriated funds therefore generally apply to the Commission, as do the legal principles governing appropriations. Thus, benefits received by a Commission employee as a result of trips paid for, in part or in whole, by Commission funds are property of the Commission. The Comptroller General did recognize, however, that many airlines do not permit members to have separate frequent flyer accounts for personal and official travel. In such cases, the Comptroller General concluded that employees are free to use personal mileage credits, so long as they are able to provide adequate records distinguishing personal from official benefits. The Comptroller General emphasized that the burden of proof is on the employee to show that credits used for personal travel do not exceed those acquired on personal travel.

## Ethics Information Center Continues to Grow

The Ethics Information Center (Center), a centralized repository for ethics training materials for executive branch agencies, continues to offer a variety of training information to the ethics community. The Ethics CD is one item which can be previewed in the Center. The CD is intended to be a complete reference library of ethics materials issued by OGE since its inception. Other holdings in the Center include video tapes, training scripts, overheads, case studies, computer discs, and more.



If you have developed training tools or ideas which may be beneficial to other agencies, please share your ideas by submitting them to the Center. Although your materials may be "agency-specific," that does not preclude them from being useful to other ethics practitioners. Please remember to include a 3 1/2" or 5 1/4" computer diskette of your written materials, whenever possible. This makes it much easier for other practitioners to copy and edit data to meet their needs. Your submissions may be sent to:

Ethics Information Center  
Office of Government Ethics  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

The Center operates Monday through Friday from 8:30 a.m. to 4:00 p.m. Due to space limitations, please contact either Tonda King or Sandy McKinzy at 202-523-5757, extensions 1229 or 1212, respectively, to schedule an appointment.

### **Thanks for Your Recent Submissions**

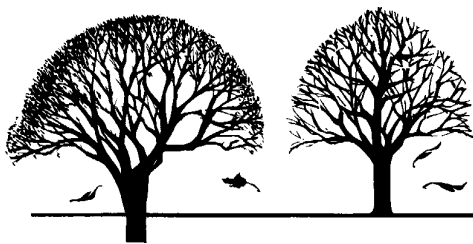
Agency for International Development  
Agricultural Research Service (USDA)  
Central Intelligence Agency  
Defense Mapping Agency  
Department of the Army  
Department of Defense  
Department of Energy  
Department of the Interior  
Department of Transportation  
Environmental Protection Agency  
Executive Office of the President  
Export-Import Bank of the United States  
Farm Credit Administration  
Federal Law Enforcement Training Center  
Federal Transit Administration  
Forest Service (USDA)  
Internal Revenue Service  
Nuclear Regulatory Commission  
Office of Special Counsel  
Postal Rate Commission  
Tennessee Valley Authority  
United States Information Agency  
United States Postal Service

# Ethics Programs "Outside the Beltway"

Last fall, OGE surveyed selected civilian Departments and agencies (referred to collectively as "agencies") to determine which of their field offices have *bona fide* ethics programs. *Bona fide* field office ethics programs are those that collect, review, and retain financial disclosure reports and/or conduct ethics training, in addition to providing oral/written ethics advice.

A total of 19 civilian agencies indicated that they have *bona fide* field office ethics programs, at nearly 600 locations in 250 cities throughout the United States and the world.

In many cases, field office ethics programs for several different agencies are located in the same geographic area. Ethics staffs



in these areas may be able to work together to coordinate training efforts, resolve routine issues, and ultimately, conserve resources.

You may access the survey results which are available in two formats; sorted by agency name or sorted by location. The documents, which include the name of the

agency, name, address, and phone number of a contact person, and elements of the office's ethics program, are quite lengthy. You may view a printout of each of these files in the Ethics Information Center at OGE. OGE has also made them available through TEBBS. To obtain a disk copy of the results (WordPerfect 6.0), send a 3 1/2" floppy disk to:

Lisa Deener  
Program Assistance Division  
U. S. Office of Government Ethics  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

Please specify which format you prefer, sorted by agency name or sorted by location.

## Ethics News Briefs

### Supplemental Agency Ethics Regulations Update

With OGE's concurrence and co-signature, the following additional agencies have issued or proposed, for codification in title 5 C.F.R., supplemental standards of ethical conduct for their employees (in addition to the executive branchwide standards at 5 C.F.R. part 2635). They have also revoked their residual old standards and issued cross-references to the new provisions, or have proposed to do so.

Farm Credit System Insurance Corporation (interim final rule) — 60 *Federal Register* 30773-30778 (June 12, 1995).

Farm Credit Administration (interim final rule) — 60 *Federal Register* 30778-30783 (June 12, 1995).

Department of Housing and Urban Development (proposed rule) — 60 *Federal Register* 34420-34426 (June 30, 1995).

Overseas Private Investment Corporation (final rule) — 60 *Federal Register* 37555-37556 (July 21, 1995).

### Proposed Amendments to the Widely Attended Gatherings Gifts Exception

OGE has issued proposed amendments to the widely attended gatherings gifts exception under the executive branchwide standards of ethical conduct regulation (5 C.F.R. § 2635.204(g)). There are several features to this proposed rule: It is based primarily on a White House alternative request for changes to enable acceptance of unsolicited invitations from persons other than the sponsor where there has been a determination of agency interest; more than 100 persons must be expected to attend the event; and the gift of free attendance must have a market value of \$250 or less. The proposal also would reemphasize that widely attended gatherings involve a large number of persons and permit free attendance by guests as well as spouses in appropriate circumstances, including events at which employees are invited to speak. See 60 *Federal Register* 31415-31418 (June 15, 1995).

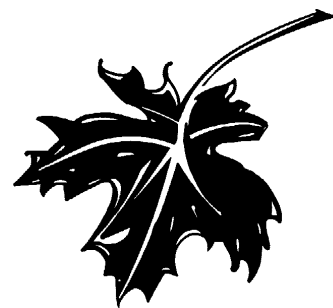
### Paperwork notices

OGE has published two notices regarding its requests for renewed Paperwork Reduction Act approval by the Office of

Management and Budget of its updated qualified trust model documents and certificates as well as the Standard Form 450 confidential financial disclosure report. The latter will be effective until OGE develops a new replacement OGE reporting form. See 60 *Federal Register* 32327-32328 (June 21, 1995) and 60 *Federal Register* 34258-34259 (June 30, 1995).

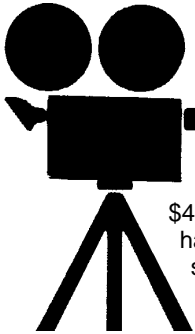
### Miscellaneous

OGE has issued its final Equal Access to Justice Act rule for any covered administrative adversary proceedings before it. See 60 *Federal Register* 38665-38666 (July 28, 1995).



## SF 278 Video Released

OGE's latest videotape, "Public Financial Disclosure: A Closer Look," is now available. It features a newly appointed official who meets an old friend. Together with other characters, they explore the need for high-level executive branch officials to file public financial disclosure reports. The emphasis



is on the importance of completing the report accurately and completely. You may purchase this video from the National Technical Information Service for \$40.00 plus \$4.00 shipping and handling by calling the sales desk at 703-487-4650. Please identify the videotape by its complete title and its stock number, AVA19788-VNB1.

## SF 450 Computer Software Available

At the Annual Ethics Conference, OGE demonstrated and distributed a free computer software program for completing and printing the SF 450 confidential financial disclosure report. Developed by OGE's Office of Information Resources Management, this stand-alone software requires only DOS to run the program. The program allows the individual filer to complete and print the form while saving the data to a database file which can be recalled and updated the following year. Any changes made to the data in subsequent filings will be highlighted on the printed form so the differences between the last and current filing can easily be seen. This should save considerable time for the filer and the reviewer. A similar program, with even

more sophisticated built-in editing and "technical review" capabilities, is under development for the SF 278 public financial disclosure report. The current version of the SF 450 software (Version 1.0a) can be downloaded from TEBBS, or obtained from the Ethics Information Center. Copies should also be available from agency ethics offices.

Office of Government Ethics  
1201 New York Avenue, NW, Suite 500  
Washington, DC 20005-3917

Official Business  
Penalty for Private Use, \$300

Bulk Rate  
Postage & Fees Paid  
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