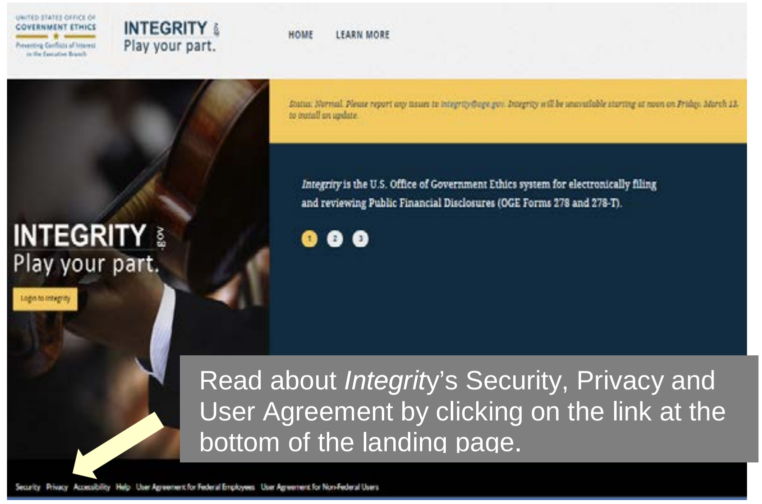
Electronically Filing in *INTEGRITY*



Introduction: We use *INTEGRITY*, https://integrity.gov, to securely electronically file the OGE 278, Public Financial Disclosure Report, and the OGE Form 278-T, Periodic Transaction Report.

INTEGRITY is a new electronic filing system the Office of Government Ethics developed for the executive branch as Congress required in the Stop Trading on Congressional Knowledge (STOCK) Act of 2012. *INTEGRITY* presents filers with a combination of data-entry tables and context-dependent questions to help filers identify all of their reportable financial interests and to disclose those interests correctly.

User-friendly reporting.

- Brief instructions on screen and
- Tool tips on demand (white question mark on blue background).

OGE's two primary objectives:

- Reduce the burden on filers and
- Increase the accuracy of public financial disclosure.

A team of OGE analysts and attorneys with financial disclosure expertise developed the content for *INTEGRITY*, and OGE worked closely with a team of user-experience professionals to make the system user friendly. Throughout *INTEGRITY*'s development, OGE collaborated with agency ethics officials, who provided input and tested the system extensively.

Same reportable information. OGE redesigned the OGE Form 278 to support the two fundamental goals of the public financial disclosure system:

- Preventing conflicts of interest and
- Promoting transparency.

The new report form, the OGE Form 278e, organizes reported information differently. The following table cross-references the two forms:

OGE Form 278e Parts	OGE Form 278 Sections
Cover page	Cover page
Part 1: Filer's Positions Held Outside United States Government	Schedule D, Part I: Positions Held Outside the U.S. Government
Part 2: Filer's Employment Assets and Income	Schedule A: Assets and Income
Part 3: Filer's Employment Agreements and Arrangements	Schedule C, Part II: Agreements or Arrangements
Part 4: Filer's Sources of Compensation Exceeding $5,000 in a Year	Schedule D, Part II: Compensation Exceeding $5,000 in a Year
Part 5: Spouse's Employment Assets and Income	Schedule A: Assets and Income
Part 6: Other Assets and Income	Schedule A: Assets and Income
Part 7: Transactions	Schedule B, Part I: Transactions
Part 8: Liabilities	Schedule C, Part II: Liabilities
Part 9: Gifts and Travel Reimbursements	Schedule B, Part II: Gifts, Reimbursements, and Travel Expenses

OGE reorganized the disclosure of information based on its experience that filers, particularly filers entering government service for the first time, occasionally forget to report financial interests related to non-federal employment. It is not uncommon for agency ethics officials to have to instruct filers to add these items to their reports. By segregating financial interests related to employment, the OGE Form 278e reduces the risk of inadvertent omission. This structure also promotes transparency by highlighting information of significant interest to the public.

Information regarding employment-related interests and retirement plans is collected in Part 2 (Filer's Employment Assets and Income) and Part 5 (Spouse's Employment Assets and Income). In these sections, filers will report the following three categories of financial interests:

- Earned income,
- Assets obtained from an employer or through employment, and
- Retirement plans.

See Appendix A, What & What Not to Report, for examples of what to report in each part.

Visit Learn about *INTEGRITY*, https://community.max.gov/x/vQApLg, for more information, including narrated tutorials on how to file an OGE Form 278-T in *INTEGRITY*, or watch an overview of its features, https://www.youtube.com/watch?v=FFGK-dDo_kE&feature=player_embedded.

Preparing. Have the same information you used when completing your previous OGE 278 and a copy of that last report. For example, refer to your reports of earnings and financial statements.

Login. On the landing page, https://integrity.gov, click on "**Login to Integrity**."
On the login screen, you may have several options:
1. Enter your MAX.gov user ID and password (note: if you have never logged in to MAX.gov, click on the "Forgot, set, or change your password?" link and follow the on-screen prompts to create a password on MAX.gov);

2. Choose to login with your CAC/PIN; or,

3. If your agency is listed as a "MAX Agency Federated Partner," login by clicking on the button for your agency. MAX will route you through your agency authenticator. If you are already logged in at your agency, you will be connected directly to MAX without further prompt. Consider checking the "Use this Agency Login every time I log into MAX." If you exclusively use this feature for MAX login, you no longer need to periodically update your MAX password.

See Appendix B for login tips.

Mention login to *INTEGRITY*. MAX Support: 202.395.6860, maxsupport@omb.eop.gov. Available weekdays 8:30 a.m. to 9:00 p.m. and weekends 9:00 a.m. to 6:00 p.m.

Contact Information. The first time you login to *INTEGRITY,* you see a partially completed "**Contact Information**" screen. Review and update the information, read the appropriate *User Agreement and Rules of Behavior*, check the checkbox to acknowledge that you read and agree to it, then click **Submit**.

Start your 278. Next, *INTEGRITY* displays your **My Tasks** dashboard. To start your Assigned OGE Form 278, click on **Start** in the row to the right.

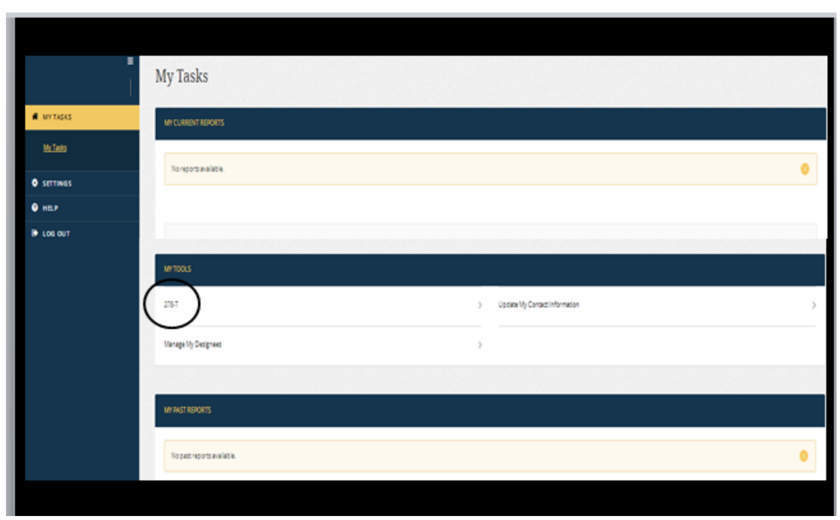
Contact your ethics official if you don't need to file the assigned report or you do not see any assigned report.

After you click **Start** (or Update if you already started your 278), *INTEGRITY* will display questions for you to answer to report your financial holdings.

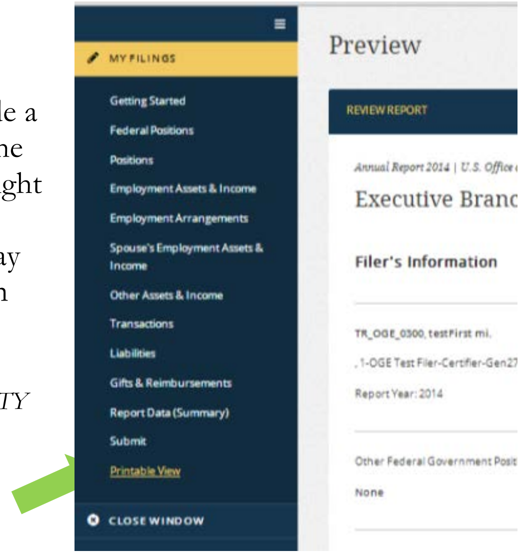
As you enter your information, the wizard will build your report based on your answers.

The left-side navigation will expand to show the different parts applicable to your situation based on your answers. As you finish a part of the report, that part's title will appear in the table of contents-type view. At the left is a sample for a typical Annual report where the filer has a spouse. It shows the nine parts starting with Federal Positions through Gifts and Reimbursements. These work like hyperlinks - click on a title to jump to that part of your report. Click **Submit** to file your report.

Need to Start a 278-T? On your **My Tasks** dashboard, scroll down to the **My Tools** area. Click on **278-T**. Integrity will display it in a new tab or window.



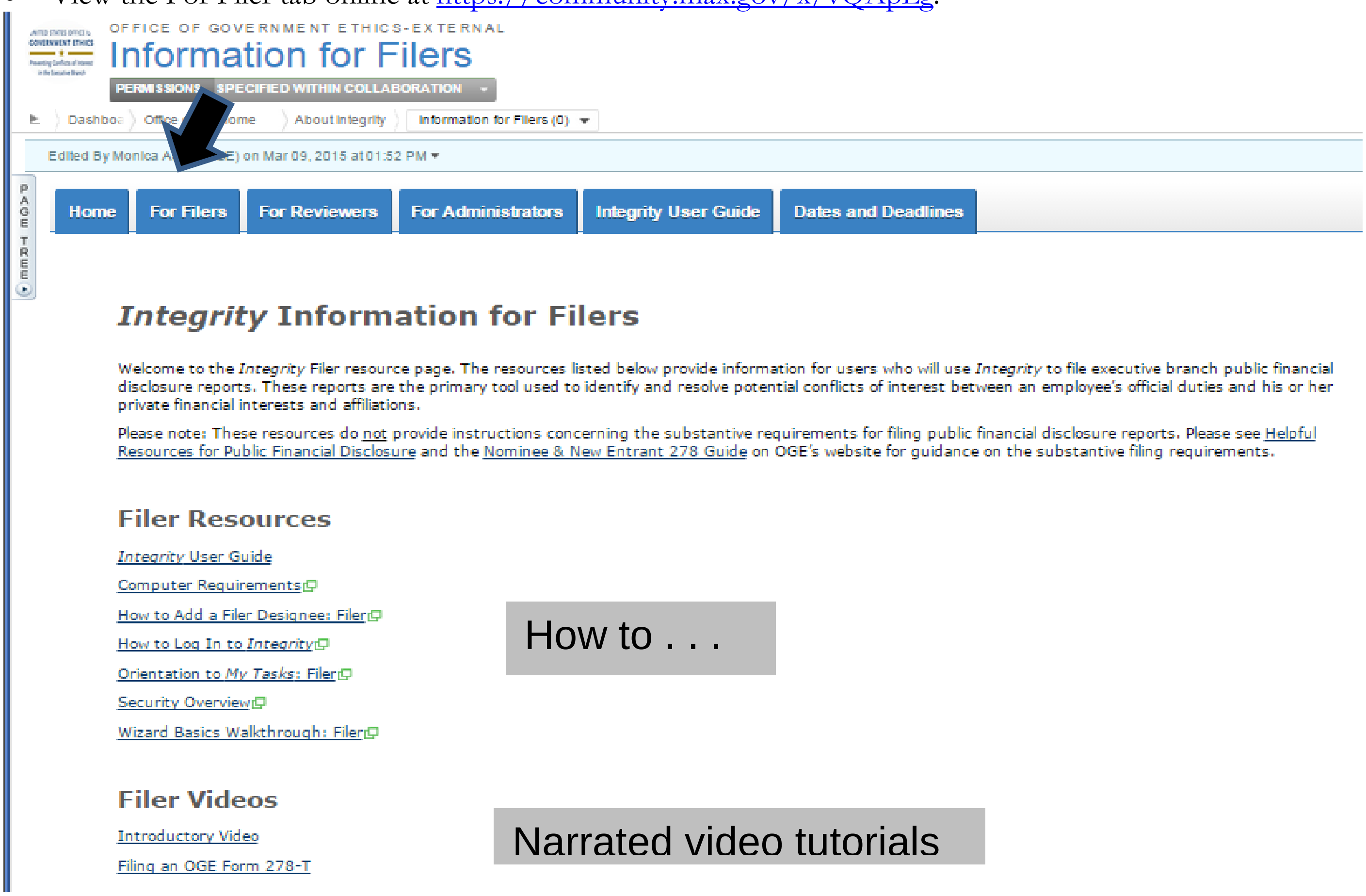
Printable View. In case you want to print your report, inside a report, click the **Printable View** button near the bottom of the left-side navigation. Use your Internet browser's print tool, right click in the report data area and select Print or block copy the report data and paste to a document to save or print. You may print a copy at any time you see the **Printable View** button in the left-side navigation.



Note: your agency's reviewers can see your report in *INTEGRITY* so there is seldom a need to print it.

Want more information?

- Contact your ethics official,
- See the User Guide, Section 4 (OGE form 278e) or Section 5 (OGE Form 278-T) for screen-by-screen instructions, or
- View the For Filer tab online at https://community.max.gov/x/vQApLg.



INTEGRITY.gov
Play your part.

Appendix A - What & What Not to Report

Contact your ethics official if you have questions about what you should report.

Part 1: Filer's Positions Held Outside U.S. Government

Report:	Do Not Report:
All positions outside the U.S. Government held at any time during the reporting period, whether or not you were compensated and whether or not you currently hold that position. Positions include an officer, director, employee, trustee, general partner, proprietor, representative, executor, or consultant of any of the following: • Corporation, company, firm, partnership, trust, or other business enterprise • Non-profit or volunteer organization • Educational institution • Labor organization • Any organization other than the US Government	• Any position with a - Religious entity - Social entity - Fraternal entity - Political entity • Any position that you hold as part of your official duties • Any position solely of an honorary nature

Part 2: Filer's Employment Assets and Income

Report:	Do Not Report:
• all sources of non-Federal salary, fees, commissions, and other earned income greater than $200 • bonus • consulting fee • deferred compensation • defined benefit pension plan • defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account) • director's fee • employee stock ownership plan • employee stock purchase plan • employer stock obtained through employment (e.g., by exercising a stock option) • farming income • fee for serving as a trustee or as an executor or administrator of an estate • honorarium • incentive stock option • individual retirement account (IRA) • investment fund created by an employer solely for employees • law firm income • LLC income • long-term incentive plan • money purchase pension plan • partnership distribution or partnership distributive share • phantom stock • restricted stock • restricted stock unit • self-funded defined benefit plan • severance payment from an employer • solo legal practice income • split-dollar life insurance • stock appreciation right	• Federal Government employment, salary or retirement benefits • Thrift Savings Plan • Social Security benefits

Part 3: Filer's Employment Agreements and Arrangements

Report:	Do Not Report:
• Continuing participation in an employee pension or benefit plan (e.g., pension, 401(k), deferred compensation) maintained by a former employer • A leave of absence • Future employment, including date you accepted employment offer • Continuation of payment by a former employer (including severance pay) Note: Report any negotiations for future employment from the point you and a potential non-Federal employer have agreed to your future employment by that employer whether or not you have settled all of the terms, such as salary, title, benefits, and date employment is to begin.	• Any agreement or arrangement related to your employment by the Federal Government • Spouse's and dependent child's agreements or arrangements

Part 4: Filer's Sources of Compensation Exceeding $5,000 in a Year (New Entrant Filers only)

Report:	Do Not Report:
Sources of compensation in excess of $5,000 and the nature of the duties you provided. This includes not only the source of your salary or other fees, but the disclosure of clients for whom you personally provided more than $5,000 in services even though the clients' payments were made to your employer, firm or other business affiliation. Note: Report in this part only when a client paid your business affiliation more than $5,000 for your services. When a source paid you directly report that in Part 6 if the payment was in the reporting period.	• information to the extent that it is considered confidential as a result of a privileged relationship established by law, or • information about persons for whom services were provided by a business affiliation of which you were a member, partner or employee *unless* you were directly involved in the provision of the services. The name of a client of a law firm is not generally confidential. • compensation paid to your spouse or a dependent child.

Part 5: Spouse's Employment Assets and Income

Report:	Do Not Report:
• all sources of non-Federal salary, fees, commissions, and other earned income greater than $200 • bonus • consulting fee • deferred compensation • defined benefit pension plan • defined contribution plan (e.g., 401(k) plan, 403(b) plan, 457 plan, TIAA-CREF account) • director's fee • employee stock ownership and/or employee stock purchase plan • employer stock obtained through employment (e.g., by exercising a stock option) • farming income • fee for serving as a trustee or as an executor or administrator of an estate • honorarium • incentive stock option • individual retirement account (IRA) • investment fund created by an employer solely for employees • law firm income • LLC income • long-term incentive plan • money purchase pension plan • partnership distribution or partnership distributive share • phantom stock • restricted stock • restricted stock unit • self-funded defined benefit plan • severance payment from an employer • solo legal practice income • split-dollar life insurance • stock appreciation right	• Federal Government employment, salary or retirement benefits • Thrift Savings Plan • Social Security benefits

Part 6: Other Assets and Income

Report for Yourself, Spouse, and Dependent Child:	Do Not Report:
Assets held for investment with a value greater than $1,000 at the end of the reporting period OR assets held for investment which produced more than $200 in income during the reporting period, including but not limited to: • stocks, bonds, trust holdings, partnership interests, life insurance (other than term), investment real estate, or a privately-held trade or business • mutual funds (report the full name of the fund, not just the general family fund name) • holdings in retirement plans, such as 401(k)s or IRAs (list each holding) (unless reported in Part 2 or 5) • holdings of investment life insurance (universal, variable, or whole) • commercial crops, livestock • 529 plan (college savings plan or prepaid tuition plan) • American depositary receipt • annuity (fixed or variable) purchased on the market • bank account • beneficial interest in a trust • brokerage account holdings • collectible item • common trust fund of a bank • corporate bond (not acquired through employment (reported in Part 2 or 5)) • equity index-linked note • exchange-traded fund • foreign exchange position (forex) • futures contract • government agency security • investment fund unrelated to employment • life insurance (universal, variable, or whole) • loan made to another party • managed account holdings • money market account • money market mutual fund • mutual fund • oil, gas, or other mineral rights lease • put or call option not acquired through employment • real estate • real estate holding company (e.g., REIT) • short sale	• Federal Government retirement benefits • Thrift Savings Plan • Term life insurance • Your personal residence ***unless you rent it out*** • Money owed to you, your spouse, or dependent child by a spouse, parent, sibling, or child • Deposits aggregating $5,000 or less in a single financial institution in money market accounts, certificates of deposit, savings accounts, checking accounts or other deposits • Income arising from the dissolution of the filer's marriage or permanent separation such as alimony or child support • Dependent child's earned income or other non-investment income • Veterans' benefits • Federal Government salary of you or your spouse • Spouse's Federal Government retirement benefits • Social Security benefits

Part 7: Transactions (Annual and Termination filers only)

Report for Yourself, Spouse, and Dependent Child:	Do Not Report a transaction involving:
Any purchase, sale, or exchange of any real property, stocks, bonds, commodity futures, mutual funds, and other securities when the amount involved in the transaction **exceeded $1,000**. Only those transactions that individually exceeded $1,000 need to be reported.	• your personal residence (unless rented out) • a money market or personal savings account • a holding of a Qualified blind, diversified, or excepted trust • US Treasury bills, notes, and bonds • solely by and between you, your spouse, and/or dependent child(ren)

Part 8: Liabilities

Report for Yourself, Spouse, and Dependent Child:	Do Not Report:
A liability over $10,000 owed at any time during the reporting period. Report the highest amount owed on any liability held during the reporting period, not just at the end of the period. Examples: rental property mortgage, student loans, investment loans, and lines of credit *As a result of the Stop Trading on Congressional Knowledge Act of 2012, Presidentially Appointed, Senate-Confirmed filers must report any personal residence mortgage on their OGE 278 filed after April 4, 2012. Do not include the street address (e.g., 123 Main). Other Filers do not report the mortgage liability on their personal residence unless it is rented out.	• a personal liability owed to a spouse or dependent child, or to a parent, brother, sister, or child of you, your spouse or dependent child • a mortgage or home equity loan secured by real property which is the personal residence* (or a second residence not used for producing income) of you or your spouse • a loan secured by a personal motor vehicle, household furniture, or appliances, where the loan does not exceed the purchase price of the item • a revolving charge account where the outstanding liability did not exceed $10,000 as of the close of the reporting period • any liability of your spouse or dependent child which represents the sole financial interest or responsibility of the spouse or child, and about which you have no knowledge, and which is not derived from your income, assets, or activities, and concerning which you neither derive nor expect to derive any financial or economic benefit.

Part 9: Gifts and Travel Reimbursements *Annual & Termination Filers only*)

Report for Yourself, Spouse, and Dependent Child:	Do Not Report:
• Travel-related reimbursements (items such as lodging, transportation, and food) totaling more than $375 from any one source during the reporting period; include where you traveled, the purpose, and date(s) of the trip • Any other gifts totaling more than $375 from any one source during the reporting period *If you received more than one gift from one source: 1. Determine the value of each item you received from that source 2. Ignore each item valued at $150 or less 3. Add the value of those items valued at more than $150; if the total is more than $375, then you must list those items on this form	• Anything for which you paid fair market value • Anything received from relatives (i.e., your father, mother, son, daughter, brother, sister, uncle, aunt, great uncle, great aunt, first cousin, nephew, niece, husband, wife, grandfather, grandmother, grandson, granddaughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, half sister, your spouse's grandfather or grandmother, or your fiancé or fiancée); • Anything received from the U.S. Government, D.C., state, or local governments • Bequests and other forms of inheritance • Gifts and travel reimbursements given to your agency in connection with your official travel • Gift items in the nature of communications to your office, such as subscriptions to newspapers and periodicals • Suitable mementos of a function honoring you • Gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises • Anything received by your spouse or dependent child totally independent of their relationship to you

Contact your agency ethics official if you have questions about what to report.

Appendix B - Login Tips

On the landing page, https://integrity.gov, click on "**Login to Integrity**."

On the login screen, you may have several options:

1. Enter your MAX.gov user ID and password (note: if you have never logged in to MAX.gov, click on the "Forgot, set, or change your password?" link and follow the on-screen prompts to create a password on MAX.gov);

2. Choose to login with your CAC/PIN; or,

3. If your agency is listed as a "MAX Agency Federated Partner," login by clicking on the button for your agency. MAX will route you through your agency authenticator. If you are already logged in at your agency, you will be connected directly to MAX without further prompt. Consider checking the "Use this Agency Login every time I log into MAX." If you exclusively use this feature for MAX login, you no longer need to periodically update your MAX password.

Mention login to *INTEGRITY*. MAX Support: 202.395.6860, maxsupport@omb.eop.gov. Available weekdays 8:30 a.m. to 9:00 p.m. and weekends 9:00 a.m. to 6:00 p.m.

INTEGRITY uses MAX authentication service so your agency doesn't have to manage user IDs and passwords.

Troubleshooting login. Try one or more of these tips if you see an "access denied" error message.

1. Are you registered as an Integrity user? Check with your agency ethics official.
2. Never logged in to MAX.gov? Activate the MAX.gov account when starting to login to *INTEGRITY*. Here is how: Click "Login to Integrity" on the landing page, https://integrity.gov, to open the ID/password dialog box. Above the password field, click on the "*Forgot, set, or change your password?*" link. This will open a dialog box where you enter your email address to receive MAX.gov account activation instructions and to create a password that you will use to access *INTEGRITY*.
3. What Internet browser? Must be Internet Explorer (IE) 10 or greater, Google Chrome 36 or greater, Firefox 31 or greater, or Safari 6 or greater. Also works with IE 9 if Adobe flash player installed. Check with your IT Help Desk.
4. Clear your cache. Your Internet browser's cache stores various information from web pages you visit. Occasionally, the cache can prevent you from seeing updated content or cause functional problems. You can fix many browser problems by simply clearing your cache. To clear your browser's cache (temporary internet files), visit http://www.wikihow.com/Clear-Your-Browser's-Cache, for instructions.
5. Close your Internet browser window(s) completely, then in a new browser window go to https://integrity.gov, and click "Login to Integrity".

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