



2021

**HHS ETHICS
CALENDAR**

REPORTS DUE

OGE Form 450, Confidential Financial Disclosure Report, is due to reviewers by February 16, 2021, unless the filer was granted an extension. This report covers the period from January 1, 2020 through December 31, 2020. Most filers should be using EFDS, or for CMS, CDC, and NIH, their legacy electronic filing systems.

OGE Form 278e, Public Financial Disclosure Report, is due to reviewers by May 17, 2021, unless the filer was granted an extension. This report covers the period from January 1, 2020 through December 31, 2020. Most filers should be using OGE *Integrity*, or for CDC and NIH, their legacy electronic filing systems.

HHS-520, Request for Approval of Outside Activity, is submitted as necessary throughout the year. The [Outside Activity Reporting System \(OARS\)](#) may now be used to file HHS-520s. ACF, CMS, CDC, and NIH use their own electronic filing systems.

HHS-521, Annual Report of Outside Activity, must be submitted to the employee's supervisor by February 28, 2021. The [Outside Activity Reporting System \(OARS\)](#) may now be used to file HHS-521s. ACF, CMS, CDC, and NIH use their own electronic filing systems.

***As necessary, please remind HHS-520 and HHS-521 filers throughout the year of the need to renew their requests for approval of an ongoing outside activity by filing renewal HHS-520s at least 45 days before their current HHS-520s expire. HHS-520s are only good for one year from the date they are approved.

SF 326 (or OGE Form 1353), Semiannual Report of Payments Accepted from a Non-Federal Source under 31 U.S.C. § 1353, covering in kind benefits received in excess of \$250 received during the period October 1, 2020 through March 31, 2021, is due to ASA/PSC by date set by ASA/PSC, usually on or about May 20. Similarly, an SF 326 (or OGE Form 1353), for in kind benefits received in excess of \$250 received during the period April 1, 2021 through September 30, 2021, is due to ASA/PSC by date set by ASA/PSC, usually on or about November 20. **NEGATIVE REPORTS ARE REQUIRED. DO NOT REPORT PAYMENTS ACCEPTED FROM A NON-FEDERAL SOURCE UNDER OTHER AUTHORITIES, SUCH AS 42 U.S.C. § 3506 or 5 U.S.C. § 7342.**

THROUGHOUT THE YEAR

Initial Ethics Training: Ensure that each new employee receives an initial ethics training (IET) [prior to 2017 was known as initial ethics orientation (IEO)] within three months from the time the new employee begins working for HHS. An online IET module is accessible by using the HHS Access Management System. The 20 minute ethics introduction that new employees may receive during a New Employee Orientation (NEO) session does not, on its own, fully satisfy the regulatory requirement for IET. You are responsible for tracking IET completion. It is helpful to send periodic reminders to employees required to be trained.

DEC / EC Quarterly Meetings: Dates will be shared as soon as meetings are scheduled.

DEC Annual Workshop: Will likely be held during the fall of 2021. Further details will be shared as they become available.

Annual Ethics Training: Annual ethics training (AET) must be completed by all public (OGE Form 278e) and confidential (OGE Form 450) financial disclosure filers. The deadline for 2021 AET completion will be announced at the time of its launch. You are responsible for tracking AET completion. It is helpful to send periodic reminders to employees required to be trained.

IEC Meetings: Interagency Ethics Council (IEC) monthly meetings are held on the first or second Thursday of every month. The IEC presents topics of interest to ethics advisors. To receive information on upcoming IEC meetings, please go to <https://community.max.gov/x/rIL2P> or <https://community.max.gov/display/FTC/IEC+Journal>. Click on "Watchers" in the top right of your screen, and select "Watch This Page Family." This will allow you receive updates whenever a new post is added to the site.

Waivers: Copies of all conflict of interest waivers issued under 18 U.S.C. §§ 208(b)(1) and (b)(3) must be forwarded to the Ethics Division. At a minimum, waivers should be forwarded at the end of each quarter. All 208(b)(1) waivers require prior approval by Randall Hall, the HHS Alternate Designated Agency Ethics Official (ADAEO). Consult with your Advice Section attorney if you are considering issuance of a (b)(1) waiver. Components are to consult with the Ethics Division prior to the issuance of a 208(b)(3) waiver where such a review is practicable. For those rare instances where prior review is not practicable, a full Ethics Division review will occur after issuance.

Waivers from October 1 through December 31, 2020, are due the first week of January 2021. Waivers from January 1 through March 31, 2021, are due the first week of April; waivers from April 1 through June 30, 2021, are due the first week of July; waivers from July 1 through September 30, 2021, are due the first week of October. For fiscal year 2022, waivers from October 1 through December 31, 2021, are due the first week of January 2022.

February 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	1	2	3	4 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	5	6
7	8	9	10	11	12	13
14	15 FEDERAL HOLIDAY	16 CY 2020 OGE Form 450 is due to be filed with reviewers by this date, unless extension is granted [document all extensions]	17 Unless further information is required, each OGE Form 450 to be reviewed and certified within 60 days of receipt	18 Begin generating list of untimely OGE Form 450 filers and notify filers’ supervisors	19	20
21	22	23	24	25 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	26	27
28	-	-	-	-	-	-

March 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	1 Deadline for employees to submit HHS-521 to their supervisors	2	3	4 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	5	6
7	8	9	10	11	12	13
14	15 Identify all public filers and notify them that CY 2020 OGE Form 278e is due by May 17	16	17	18	19 Ask supervisors to obtain and provide to you any HHS 521 forms you haven't received yet	20
21	22	23	24	25 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	26	27
28	29	30	31 End of 10/1/20 – 3/31/21 reporting period for travel payments accepted under 31 U.S.C. § 1353	-	-	-

April 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	<p>First week of April: Forward to the Ethics Division copies of all 18 U.S.C. § 208(b)(1) and § 208(b)(3) waivers issued since last submission</p>	-	-	<p>1 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]</p>	<p>2 OGE Form 450 is due from filers granted first 45 day extensions</p>	3
4	5	6	7	8	9	10
11	12	13	14	<p>15 Notify public filers that CY 2020 OGE Form 278e is due by May 17</p>	16	17
18	<p>19 Unless further information is required, each OGE Form 450 filed timely to be certified (within 60 days of receipt)</p>	<p>20 Reminder that 31 U.S.C. § 1353 Travel Report using OGE Form 1353 or SF 326 due to ASA/PSC by date set by PSC, usually on or about May 20; negative reports required</p>	21	22	23	24
25	26	27	28	<p>29 Seeking / Post-Employment Brown Bag 12 – 1:30 pm</p>	30	-

May 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	-	-	-	-	-	1
2	3	4	5	6 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	7	8
9	10	11	12	13	14	15
16	17 CY 2020 OGE Form 278e is due to be filed with reviewers by this date, unless extension is granted [document all extensions] OGE Form 450 is due from filers granted 90 day extensions	18 Begin generating list of untimely OGE Form 278e filers and notify filers’ supervisors	19 Unless further information is required, each OGE Form 278e to be reviewed and certified within 60 days of receipt	20	21 By now CY 2020 HHS-521 forms should have been received, reviewed, and finalized.	22
23	24	25	26	27 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	28	29
30	31 FEDERAL HOLIDAY	-	-	-	-	-

June 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	-	1 Unless further information is required, each OGE Form 450 with 45 day extension to be certified (within 60 days of filing)	2	3 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	4	5
6	7	8	9	10	11	12
13	14	15	16 For CY 2020 OGE Form 278e filers who failed to file and lacked approved extensions, last day to submit 278e without incurring late fee	17 Late filing fee now applies to CY 2020 OGE Form 278e filers who did not file and lacked approved extensions	18	19
20	21	22	23	24 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	25	26
27	28	29	30	-	-	-

July 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	<p>First week of July: Forward to the Ethics Division copies of all 18 U.S.C. § 208(b)(1) and § 208(b)(3) waivers issued since last submission</p>	-	-	<p>1 OGE Form 278e is due from filers granted first 45 day extensions</p> <p>Last day for request of OGE Form 278e second 45 day extensions [document all extensions]</p> <p>IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]</p>	2	3
4	5 FEDERAL HOLIDAY	6	7	8	9	10
11	12	13	14	15	16 Unless further information is required, each OGE Form 450 with two 45 day extensions to be certified (within 60 days of filing)	17
18	19	20	21	22	23	24
25	26	27	28	29 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	30	31

August 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2 For CY 2020 OGE Form 278e filers with 45 day filing extensions, last day to submit 278e without incurring late fee	3 Late filing fee now applies to CY 2020 OGE Form 278e filers who did not file within their 45 day filing extensions	4	5 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	6	7
8	9	10	11	12	13	14
15	16 CY 2020 OGE Form 278e is due from filers granted second 45 day extensions	17	18	19	20	21
22	23	24	25	26	27	28
29	30 Unless further information is required, each OGE Form 278e with one 45 day extension to be certified (within 60 days of filing)	31	-	-	-	-

September 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	-	-	1	2 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	3	4
5	6 FEDERAL HOLIDAY	7	8	9	10	11
12	13	14	15 For CY 2020 OGE Form 278e filers with two 45 day filing extensions, last day to submit 278e without incurring late fee	16 Late filing fee now applies to CY 2020 OGE Form 278e filers failing to file within their second 45 day extensions	17	18
19	20	21	22	23	24	25
26	27	28	29	30 Seeking / Post-Employment Brown Bag 12 – 1:30 pm End of 4/1/21 – 9/30/21 reporting period for travel payments accepted under 31 U.S.C. § 1353	-	-

October 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	First week of October: Forward to the Ethics Division copies of all 18 U.S.C. § 208(b)(1) and § 208(b)(3) waivers issued since last submission	-	-	-	1	2
3	4	5	6	7 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	8	9
10	11 FEDERAL HOLIDAY	12	13	14	15 Unless further information is required, each OGE Form 278e with two 45 day extensions to be certified (within 60 days of filing)	16
17	18	19	20 Reminder that 31 U.S.C. § 1353 Travel Report using OGE Form 1353 or SF 326 due to ASA/PSC by date set by PSC, usually on or about November 20; negative reports required	21	22	23
24	25	26	27	28 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	29	30
31	-	-	-	-	-	-

November 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	1 Only 61 days remain in financial disclosure calendar year; employees need to serve in a position for 61 days or more to file annual financial disclosure reports	2 Financial disclosure filers entering positions today and later do not file CY 2021 reports in 2022	3	4 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	5	6
7	8	9	10	11 FEDERAL HOLIDAY	12	13
14	15	16	17	18 Seeking / Post-Employment Brown Bag 12 – 1:30 pm	19	20
21	22	23	24	25 FEDERAL HOLIDAY	26	27
28	29	30	-	-	-	-

December 2021

Sun	Mon	Tue	Wed	Thu	Fri	Sat
-	-	-	1 Last day to submit copies of SES DEC performance plans for current appraisal year to Ethics Division	2 IEC Meeting 12:15 – 1:30 pm [see prior “throughout the year” page to learn how to receive meeting details]	3	4
5	6	7	8	9	10	11
12	13	14	15 Identify all confidential filers and notify them that CY 2021 OGE Form 450 is due in two months	16	17	18
19	²⁰	21	22	23	24 FEDERAL HOLIDAY	25
26	27	28	29	30 Last day to submit paper original CY 2020 OGE Forms 278e and 278T to Ethics Division. Only applies to forms filed and signed using paper. NOT APPLICABLE if filed electronically.	31 FEDERAL HOLIDAY End of CY 2021 public (OGE Form 278e) and confidential (OGE Form 450) financial disclosure reporting periods	-