

| OLD CODE               | NEW (USDA) CODE    | TITLE/DESCRIPTION   | DISPOSITION  | DISPOSITION AUTHORITY    |
|------------------------|--------------------|---|--|--------------------------|
|                        | <b><u>ETHI</u></b> | <b><u>ETHICS</u></b>  |  |                          |
| PER 8-2-1<br>PER 8-2-4 | ETHI – 1<br>✦      | Ethics Program Development and Implementation<br><br>Correspondence and Reports. Records such as determinations regarding attendance at widely attended gatherings which appropriate agency ethics officials determine are related to the routine, non-precedential application of settled legal standards to common factual situations and are not interpretations of the conflict of interest statutes, 18 U.S.C. “202-209, and other ethics statutes the violation of which may result in criminal penalties or civil fines. | <u>TEMPORARY:</u><br><br>Destroy 6 years following the conclusion of an ethics regulatory review, provision of advice to an employee, making a determination regarding outside employment, or when no longer needed for an active investigation. | GRS 2.8, Item 010        |
|                        | ETHI – 2<br>✦      | Ethics Program Interpretation<br><br>Correspondence and Reports. Records such as determinations regarding attendance at widely attended gatherings which appropriate agency ethics officials determine are related to the routine, non-precedential application of settled legal standards to common factual situations and are not interpretations of the conflict of interest statutes, 18 U.S.C. “202-209, and other ethics statutes the violation of which may result in criminal penalties or civil fines.                 | <u>TEMPORARY:</u><br><br>Destroy 6 years following the conclusion of an ethics regulatory review, provision of advice to an employee, making a determination regarding outside employment, or when no longer needed for an active investigation. | GRS 2.8, Item 010        |
|                        | ETHI – 3<br>✦      | Ethics Program Counseling<br><br>Correspondence, Reports, Case Files. Records such as determinations regarding attendance at widely attended gatherings which appropriate agency ethics officials determine are related to the routine, non-precedential application of settled legal standards to common factual situations and are not interpretations of the conflict of interest statutes, 18 U.S.C. “202-209, and other ethics statutes the violation of which may result in criminal penalties or civil fines.            | <u>TEMPORARY:</u><br><br>Destroy 6 years following the conclusion of an ethics regulatory review, provision of advice to an employee, making a determination regarding outside employment, or when no longer needed for an active investigation. | GRS 2.8, Item 010        |
|                        | ETHI – 4<br>✦      | Financial Disclosure Reporting Public SF 278 Hired<br><br>Correspondence, Reports, SF 278. All other alternative or additional financial disclosure reports.  | <u>TEMPORARY:</u><br><br>Destroy 6 years after receipt of the OGE Form 278 or 278e by the agency or when no longer needed for active investigation.  | GRS 2.8, Items 061 & 081 |

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|          | ETHI – 5<br>✦   | <p>Financial Disclosure Reporting Files - Public - SF 278 Not Hired</p> <p>Correspondence, Reports and SF 278. SF 278 reports to individuals filing in accordance with Section 101(b) or (c) of the Act, and not subsequently confirmed by the U.S. Senate or elected. Reports for individuals not subsequently confirmed by the U.S. Senate.</p> | <p><u>TEMPORARY:</u></p> <p>Destroy 1 year after nominee or candidate ceases to be under consideration for position; EXCEPT that documents needed in an ongoing investigation will be retained until no longer needed in the investigation.</p>  | GRS 2.8, Items 060 & 080 |
|          | ETHI – 6<br>✦   | <p>Financial Disclosure Reporting Files – Confidential - OGE 450 Hired</p> <p>Correspondence, Reports, OGE 450, OGE Optional Form 450-As.</p>   | <p><u>TEMPORARY:</u></p> <p>Destroy 6 years after receipt of the OGE Form 450 by the agency, except when the OGE Form 450 supports one or more subsequent Optional OGE Form 450-As then destroy 6 years after receipt of the last related OGE Form 450-A by the agency, or when no longer needed for active investigation.</p> | GRS 2.8, Items 071 & 072 |
|          | ETHI – 7<br>✦   | <p>Financial Disclosure Reporting Files – Confidential - OGE 450 Not Hired</p> <p>Correspondence, Reports and OGE 450s for individuals not subsequently confirmed by the U.S. Senate.</p>   | <p><u>TEMPORARY:</u></p> <p>Destroy 1 year after nominee or candidate ceases to be under consideration for position; EXCEPT that documents needed in an ongoing investigation will be retained until no longer needed in the investigation.</p>  | GRS 2.8, Item 070        |
|          | ETHI – 8<br>✦   | <p>Ethics Conflict of Interest Agreement</p> <p>Correspondence, Reports, Agreements and Waivers. Records documenting the review and issuance of ethics agreements used to remedy the appearance of potential or actual financial conflicts of interest.</p> <p>a. Agreements for employees who do not file financial disclosure reports.</p>      | <p><u>TEMPORARY:</u></p> <p>Destroy 6 years after waiver or other agreed-upon determination or action has been issued or undertaken or 6 years after it is no longer in effect or when no longer needed for active</p>   | GRS 2.8, Item 100        |

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|          |                        | <p>b. Agreements for employees who file financial disclosure reports.</p>  | <p>investigation, whichever is later.</p> <p><u>TEMPORARY:</u><br/>Destroy at the same time as the employee's last related financial report is destroyed or when no longer needed for active investigation, whichever is later.</p> | <p>GRS 2.8, Item 101</p>            |
|          | <p>ETHI -9<br/>✦</p>   | <p>Ethics Violations – Referrals and notifications of violations of criminal conflict of interest statutes and other potential violations files.</p> <p>Correspondence, Reports, Working Files. Referrals made to Inspectors General or the Department of Justice and notifications to OGE concerning ethics violations or suspected violations. This item also covers related background materials, including copies of disciplinary and corrective actions and disposition documents such as declinations of prosecution.</p>  | <p><u>TEMPORARY:</u><br/>Destroy 6 years after final disposition of the referral to either the IG or DOJ.</p>   | <p>GRS 2.8, Item 020</p>            |
|          | <p>ETHI – 10<br/>✦</p> | <p>Ethics Non-Federally Funded Travel</p> <p>Correspondence, Reports and Working Files. Agency copies of Semiannual Expense Reports for Non Federally Funded Travel submitted by all Executive branch agencies to the Office of Government Ethics in accordance with guidance given at 31 U.S.C. “1353, as implemented by 41 C.F.R. chapter 304 and the use of Standard Form (SF) 326 and SF 326A. Reports summarize payments made to the agency from non Federal sources for travel, subsistence, and related expenses of an employee who attends a meeting or similar function relating to official duties. Statements, forms, and other records used to compile Semiannual Expense Reports for Non Federally Funded Travel.</p> | <p><u>TEMPORARY:</u><br/>Destroy 3 years following submission of the report to OGE.</p>   | <p>GRS 2.8, Items 030 &amp; 031</p> |
|          | <p>ETHI – 11<br/>✦</p> | <p>Ethics Program Review</p> <p>Correspondence, Reports and Working Files. OGE program review reports, agency 60-day response letters, and other follow-up records sent to OGE on the resolution of program deficiencies. All other records produced during OGE program reviews, including notes and background materials.</p>   | <p><u>TEMPORARY:</u><br/>Destroy 6 years after all outstanding ethics program review deficiencies have been resolved or when the documentation or the next program review is on file.</p>   | <p>GRS 2.8, Item 050</p>            |
|          | <p>ETHI – 12<br/>✦</p> | <p>Agency Annual Ethics Questionnaire</p> <p>Correspondence, Reports, and Questionnaire. Questionnaire completed by ethics officials on an</p>   | <p><u>TEMPORARY:</u><br/>Destroy 3 years after submission.</p>  | <p>GRS 2.8, Item 040</p>            |

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|          |                 | annual basis in compliance with Section 402(e)(1) of the Ethics in Government Act of 1978, as amended, and associated records. All other records related to responses to annual agency ethics program questionnaires.  |  |                       |
|          | ETHI – 13<br>✦  | Ethics Program Procedures<br><br>Correspondence, Reports and Procedures. Procedures and related supporting records on the administration of ethics programs including, but not limited to, public and confidential financial disclosure reports systems, outside employment and activities approval systems, and referrals of violations of criminal conflict of interest statutes.  | <u>TEMPORARY:</u><br><br>Destroy 6 years following the conclusion of an ethics regulatory review, provision of advice to an employee, making determination regarding outside employment, or when no longer needed for an active investigation. | GRS 2.8, Item 010     |
|          | ETHI – 14<br>✦  | Ethics Employee Training<br><br>Correspondence, Reports, Annual Plans, Class Schedules, Rosters and Orientations. Records relating to the administration of new employee ethics orientations, annual, and other types of ethics training and education. Records include, but are not limited to, annual plans, schedules of classes, rosters of employees required to attend, verification of training completion and other related records. | <u>TEMPORARY:</u><br><br>Destroy when 6 years old.   | GRS 25, Item 8(a)     |
|          | ETHI – 15<br>✦  | Ethics Employee Training Material<br><br>Correspondence, Reports, Training Materials and Communications. Record copy of materials used in providing new employee ethics orientations, annual, and other types of ethics training and education including, but not limited to, instructors guides, handbooks, handouts and other materials used in training classes, bulletins, and newsletters.  | <u>TEMPORARY:</u><br><br>Destroy when 6 years old or when superseded or obsolete, whichever is later.  | GRS 25, Item 8(b)     |
|          |                 |  |  |                       |