

## Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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**Stannard, Paula**

Senior Counselor to Secretary, Department of Health & Human Services

Date of Appointment: 03/05/2017

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

**/s/ Stannard, Paula [electronically signed on 01/11/2017 by Stannard, Paula in Integrity.gov]**

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

**/s/ Olesh, Stanley, Certifying Official [electronically signed on 04/13/2017 by Olesh, Stanley in Integrity.gov]**

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Other review conducted by

**/s/ Olesh, Stanley, Ethics Official [electronically signed on 04/13/2017 by Olesh, Stanley in Integrity.gov]**

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U.S. Office of Government Ethics Certification

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Data Revised 04/13/2017

Data Revised 04/12/2017

Data Revised 03/20/2017

Data Revised 01/18/2017

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Comments of Reviewing Officials (public annotations):

<b>PART</b>	<b>#</b>	<b>REFERENCE</b>	<b>COMMENT</b>
N/A	N/A	General	(04/12/2017, Olesh, Stanley): IR = 1/14/17 by KS
N/A	N/A	General	(04/12/2017, Olesh, Stanley): 1/17-20 - rec'd further info
N/A	N/A	General	(04/13/2017, Olesh, Stanley): 4/12/17 - rec'd signed Ethics Agreement -- SO

## 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	Alston & Bird LLP	Washington, DC, District of Columbia	Law Firm	Project Attorney	7/2016	1/2017
2	Alston & Bird LLP	Washington, DC, District of Columbia	Law Firm	Counsel	6/2010	7/2016
3	James Wilson Institute	Washington, DC, District of Columbia	Non-Profit	Trustee	1/2009	1/2017
4	Federalist Society - Administrative Law Practice Group	Washington, District of Columbia	Non-Profit	Executive committee member	1/2015	1/2017

## 2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Alston & Bird LLP (law firm)	N/A		salary	\$177,145
2	Double Line Total Return Fund INSTL	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3	Neuberger Strategic Income Institutional Class	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
4	Prudential Short-Term Corporate Bond Fund Inc. Z	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
5	Virtus Emerging Markets Opportunity Fund Class I	Yes	\$15,001 - \$50,000		None (or less than \$201)
6	Blackrock Equity Dividend Fund	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
7	MFS International Value Fund Class I	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	AB Small Cap Growth Portfolio Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
9	Ivy Mid Cap Growth Fund Class I	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
10	JP Morgan Large Cap Growth Fund Select	Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
11	Vanguard Instl Target Retirement 2030 Fund	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
12	Federalist Society for Law & Public Policy Studies - September 2016	See Endnote			\$201 - \$1,000

### 3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	Alston & Bird LLP	Atlanta, Georgia	I will continue to participate in this defined contribution plan. The plan sponsor will not make further contributions after my separation.	6/2010

### 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	Aetna, Inc.	Hartford, Connecticut	Legal services as an attorney at Alston & Bird LLP.
2	American Cancer Society	Atlanta, Georgia	Legal services as an attorney at Alston & Bird LLP.
3	Ardent Health Services	Nashville, Tennessee	Legal services as an attorney at Alston & Bird LLP.
4	Caradigm LLC	Boston, Massachusetts	Legal services as an attorney at Alston & Bird LLP.
5	Cigna Corporation	Bloomfield, Connecticut	Legal services as an attorney at Alston & Bird LLP.

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
6	Conifer Health Solutions, Inc.	Frisco, Texas	Legal services as an attorney at Alston & Bird LLP.
7	Conifer Value Based Care LLC	Encino, California	Legal services as an attorney at Alston & Bird LLC.
8	CVS Health Corporation	Woonsocket, Rhode Island	Legal services as an attorney at Alston & Bird LLP.
9	ePatientFinder, Inc.	Austin, Texas	Legal services as an attorney at Alston & Bird LLP.
10	Fiserv, Inc.	Brookfield, Wisconsin	Legal services as an attorney at Alston & Bird LLP.
11	Healthport Technologies, LLC	Alpharetta, Georgia	Legal services as an attorney at Alston & Bird LLP.
12	Hillsides	Pasadena, California	Legal services as an attorney at Alston & Bird LLP.
13	Hodges-Mace, LLC	Atlanta, Georgia	Legal services as an attorney at Alston & Bird LLP.
14	Inmar, Inc.	Winston-Salem, North Carolina	Legal services as an attorney at Alston & Bird LLP.
15	Jiff, Inc.	Mountain View, California	Legal services as an attorney at Alston & Bird LLP.
16	Leatherman Tool Group	Portland, Oregon	Legal services as an attorney at Alston & Bird LLP.
17	Massachusetts Hospital Association	Boston, Massachusetts	Legal services as an attorney at Alston & Bird LLP.
18	Tennessee Hospital Association	Brentwood, Tennessee	Legal services as an attorney at Alston & Bird LLP.
19	Anthem, Inc.	Indianapolis, Indiana	Legal services as an attorney at Alston & Bird LLP.
20	Humana, Inc.	Louisville, Kentucky	Legal services as an attorney at Alston & Bird LLP.
21	Medical Mutual of Ohio	Cleveland, Ohio	Legal services as an attorney at Alston & Bird LLP.
22	National Association for Home Care & Hospice	Washington, District of Columbia	Legal services as an attorney at Alston & Bird LLP.
23	NetSpend	Austin, Texas	Legal services as an attorney at Alston & Bird LLP.

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
24	Notal Vision, Ltd.	Manassas, Virginia	Legal services as an attorney at Alston & Bird LLP.
25	Pamplona Capital Management LLP	New York, New York	Legal services as an attorney at Alston & Bird LLP.
26	Pfizer, Inc.	New York, New York	Legal services as an attorney at Alston & Bird LLP.
27	Qbtech AB	Stockholm, Outside U.S.	Legal services as an attorney at Alston & Bird LLP.
28	RingCentral, Inc.	Belmont, California	Legal services as an attorney at Alston & Bird LLP.
29	Roche Diagnostics Operations, Inc.	Indianapolis, Indiana	Legal services as an attorney at Alston & Bird LLP.
30	Scripps Networks Interactive, Inc.	Knoxville, Tennessee	Legal services as an attorney at Alston & Bird LLP.
31	Los Angeles County Employees Retirement Association	Pasadena, California	Legal services as an attorney at Alston & Bird LLP.
32	The LHC Group	Lafayette, Louisiana	Legal services as an attorney at Alston & Bird LLP.
33	Total System Services, Inc.	Columbus, Georgia	Legal services as an attorney at Alston & Bird LLP.
34	UnitedHealthcare, Inc.	Minnetonka, Minnesota	Legal services as an attorney at Alston & Bird LLP.
35	VISA USA	San Francisco, California	Legal services as an attorney at Alston & Bird LLP.
36	Wendy's International LLC	Dublin, Ohio	Legal services as an attorney at Alston & Bird LLP.
37	Alston & Bird LLP	Washington, District of Columbia	Attorney

## 5. Spouse's Employment Assets & Income and Retirement Accounts

None

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Affinity Plus Federal Credit Union Shares Account		\$1,001 - \$15,000		None (or less than \$201)
2	Affinity Plus Federal Credit Union 12 Month CD, Maturing 10/10/2017		\$50,001 - \$100,000	Dividends Interest	\$201 - \$1,000
3	Affinity Plus Federal Credit Union Checking Account		\$100,001 - \$250,000	Dividends Interest	\$201 - \$1,000
4	Democracy Federal Credit Union Shares Account		\$1,001 - \$15,000		None (or less than \$201)
5	Democracy Federal Credit Union Money Market Account		\$1,001 - \$15,000		None (or less than \$201)
6	Democracy Federal Credit Union Checking Account		\$1,001 - \$15,000		None (or less than \$201)
7	Northwestern Mutual Life Insurance Whole Life Insurance Policy		\$50,001 - \$100,000	Dividends	\$201 - \$1,000
8	Northwestern Mutual Life Insurance Whole Life Insurance Policy		\$15,001 - \$50,000	Dividends	\$201 - \$1,000
9	Condominium and Garage at 1910 North Halsted Street No. 2, Chicago, IL 60614		\$250,001 - \$500,000	Rent or Royalties	\$5,001 - \$15,000
10	U.S. Savings Bond, Series EE, Issued 10/86		\$15,001 - \$50,000	Interest	\$201 - \$1,000
11	US Savings Bond, Series EE, Issued 12/1992		\$15,001 - \$50,000	Interest	\$201 - \$1,000
12	iShares Core MSCI Emerging Markets ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
13	iShares Core S&P Small Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
14	iShares iBoxx \$ Investment Grade Corporate Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
15	iShares JP Morgan USD Emerging Markets Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
16	iShares MSCI EAFE ETF Paid on 155	Yes	\$1,001 - \$15,000		\$201 - \$1,000
17	iShares National Municipal Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	iShares Short-Term National Municipal Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
19	iShares US Credit Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
20	Powershares Emerging Markets Sovereign Debt	Yes	\$1,001 - \$15,000		None (or less than \$201)
21	PowerShares National AMT-Free Municipal Bond ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
22	SPDR Barclays Capital High Yield EFT	Yes	\$1,001 - \$15,000		None (or less than \$201)
23	Vanguard Index Funds Vanguard Growth ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
24	Vanguard Index Funds Vanguard Mid Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
25	Vanguard Index Funds Vanguard Value ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
26	Vanguard Short Term Corporate Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
27	Pimco Enhanced Short Maturity Active ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
28	Schwab Strategic TR US TIPS	Yes	\$1,001 - \$15,000		None (or less than \$201)
29	SPDR Barclays International Treas. Bond ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
30	Vaneck Vectors ETF TR JP Morgan Mkts.	Yes	\$1,001 - \$15,000		None (or less than \$201)
31	UBS Cash Management Account		\$1,001 - \$15,000		None (or less than \$201)
32	Health Savings Administrators HSA Account		\$1,001 - \$15,000		None (or less than \$201)
33	JP Morgain Chase & Co. Checking Account		None (or less than \$1,001)		None (or less than \$201)
34	TIAA-CREF acct	No			
34.1	TIAA Traditional Annuity	N/A	\$1,001 - \$15,000	Dividends Interest	\$201 - \$1,000
34.2	CREF Equity Index R3	Yes	\$1,001 - \$15,000		\$1,001 - \$2,500
34.3	CREF Bond Market R3	Yes	\$1,001 - \$15,000		\$201 - \$1,000
34.4	CREF Money Market	Yes	\$15,001 - \$50,000		None (or less than \$201)

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

#	CREDITOR NAME		TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Fifth Third Bank	See Endnote	Mortgage (investment/rental property)	\$50,001 - \$100,000	1994	Variable: 3% in 2016; 3.25% in 2017.	30 years
2	Chase Card Member Services		Credit Card	\$10,001 - \$15,000	2016	13.74%	Revolving Charge Card

## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

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### Endnotes

<b>PART</b>	<b>#</b>	<b>ENDNOTE</b>
2.	12	Honorarium for service on the Federalist Society's Law and Innovation Project's FDA and Health Working Group.
8.	1	Chicago rental property, rented for part of 2016.

# Summary of Contents

## 1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

## 2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

## 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

## **5. Spouse's Employment Assets & Income and Retirement Accounts**

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

## **6. Other Assets and Income**

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## **7. Transactions**

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## 8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## 9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$150 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).

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