



December 21, 1999
DO-99-048

MEMORANDUM TO: Designated Agency Ethics Officials

FROM: Stephen D. Potts, Director

SUBJECT: Second Paperwork Round For A Proposed Moderately Revised Version of the SF 278 Report Form

The Office of Government Ethics (OGE) has submitted a request to the Office of Management and Budget (OMB) for a three-year renewal of paperwork approval for a proposed moderately revised version of the SF 278 Executive Branch Personnel Public Financial Disclosure Report. As part of that request package, OGE has published a "second round" Federal Register notice with any agency or public comments due to OMB by January 18, 2000. The notice was published at 64 Federal Register 70259-70262 (December 16, 1999) and can also be found through a link on OGE's Web site under the "What's New In Ethics?" section. The mark-up copy of the SF 278 itself as proposed for revision was not published, but is available by contacting your OGE desk officer.

As noted in OGE DAEOgrams of March 18, 1999, and July 19, 1999 (#s DO-99-011 and DO-99-030), OGE decided to propose modest changes to the SF 278, retaining the same basic substance and design for the form, and keeping it a standard form. Four comments were received from the agencies based on the first round notice published last summer, along with a number of additional internal OGE suggestions. As explained in the notice of December 16th, OGE has decided for now to stay with the modest changes originally proposed with some further minor revisions. A brief mention of some of the proposed changes to the new edition of the SF 278 report form follows:

- incorporation of higher-category reporting, as required by amendments to the Ethics in Government Act, for any assets, income, liabilities and transactions, which are over \$1,000,000 in value. (Transactions will only be subject to this additional reporting requirement when the new form is finalized, since OGE just recently determined that they are included therein.)
- reflection of the new slightly higher thresholds for gifts and reimbursements (over \$260 overall, with a \$104 or less "de minimis" threshold).
- addition of a new continuation page for transactions (Schedule B, Part I).
- inclusion of a new check-off box for indicating any filing extensions and, if so, the number of days granted.

It will be some months before the new 2000 edition of the SF 278 report form will be ready for ordering nationwide from the General Services Administration's Customer Supply Centers. However, the form will be available earlier from the OGE Web site. Since the new edition will

probably not come into general circulation until late this winter or even spring, OGE will provide for, and inform all agencies of, an appropriate transition period during which the current usable editions (6/94 and 1/91) can still be utilized. Agencies will have to notify their personnel of, among other things, the higher value categories and increased gifts/reimbursement thresholds. The transition period will include the reports due by May 15, 2000, for the calendar year 1999 annual report filing season. Afterwards, the new 2000 edition will supersede those prior editions which will no longer be usable.