



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

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MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Joseph E. Gangloff
Deputy Director

SUBJECT: Tips for Public Financial Disclosure Termination Reports

The number of Presidentially-appointed, Senate-confirmed officials (PAS) departing federal service is expected to increase significantly over the coming months. To facilitate the timely review and certification of the public financial disclosure termination reports (SF 278s) that these PAS officials must file, OGE is providing the following tips:

1. Departing PAS officials are required to file a termination public financial disclosure report within 30 days of leaving federal service.
2. Departing PAS officials must report gifts, such as interview trips, received during federal service.
3. PAS officials must report any agreement or arrangement for future employment that existed during the PAS official's federal service.
4. PAS officials who have an agreement or arrangement for future employment must be recused from matters affecting those prospective employers.
5. The PAS official's termination date must be included on the cover page of the public financial disclosure report.
6. PAS officials should sign and date the termination reports no earlier than their last day of federal service.

The financial disclosure process is a keystone of the executive branch's ethics program. Timely filing of public financial disclosure reports bolsters public confidence in government processes, enhances employee respect for the ethics program and prevents embarrassment of filers. The termination review standards included in the publication, *Public Financial Disclosure: A Reviewer's Reference*, 2nd edition, (available on-line at www.usoge.gov) provides useful guidance on what information must be obtained. If you are unable to certify a report within sixty days of receiving the termination report, please notify your OGE desk officer of the delay.