



United States
Office of Government Ethics
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August 25, 2003
DO-03-015

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Daniel D. Dunning
Deputy Director for Administration and
Information Management

SUBJECT: Unmodified SF 278 Executive Branch Personnel Public
Financial Disclosure Report

The Office of Government Ethics (OGE) recently obtained from the Office of Management and Budget (OMB) renewed approval for three years under the Paperwork Reduction Act for an unmodified SF 278 Executive Branch Personnel Public Financial Disclosure Report. The SF 278 is henceforth to be accompanied by agency notification to filers of the adjustment of the gifts/travel reimbursements reporting thresholds and the revisions to the Privacy Act Statement. Both revisions have not been incorporated into the form itself at this time, since OGE plans a more thorough revision of the form in the next year or two.

Executive branch departments and agencies should inform SF 278 filers, through cover memorandum or otherwise, of these two changes when the existing March 2000 edition of SF 278 report forms are provided for completion.

Gifts/Reimbursements Reporting Thresholds

Effective January 1, 2002, GSA raised "minimal value" under the Foreign Gifts and Decorations Act, 5 U.S.C. 7342, to \$285 or less for the three-year period 2002-2004. See OGE's September 27, 2002 memorandum to designated agency ethics officials [DO-02-021](#). As a result, the thresholds for SF 278 reporting of gifts and travel reimbursements received from any one source has increased to "more than \$285" for the aggregation level for reporting and to "\$114 or less" for the de minimis aggregation exception threshold.

Routine Uses Paraphrased in the Privacy Act Statement

Effective May 22, 2003, OGE updated the OGE/GOVT-1 system of records (covering SF 278 Public Financial Disclosure Reports and other name-retrieved ethics program records). See [68 FR 27891-27897](#) (05/22/03). As a result, agencies should inform SF 278 filers that the Privacy Act Statement on page 11 of the instructions now includes three additional routine uses to the six currently listed on the form:

- (7) to reviewing officials in a new office, department or agency when an employee transfers from one covered position to another;
- (8) 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; and
- (9) to contractors and other non-Government employees working for the Federal Government to accomplish a function related to an OGE Governmentwide system of records.

Availability

For now, OGE will continue to make the unmodified SF 278 available to departments and agencies and their reporting employees through the [Forms, Publications & Other Ethics Documents](#) section of OGE's Web site. This allows employees two different fillable options for preparing their report on a computer (in addition to a downloadable blank form), although a printout and manual signature of the form are still required. The SF 278 is also available for purchase by agencies from GSA Customer Supply Centers (see OGE's November 15, 2000 memorandum to designated agency ethics officials ([DO-00-042](#))) and fillable versions are now posted on the forms library of GSA's own Web site at www.gsa.gov.