

JUSTIFICATION FOR NO MATERIAL/NON-SUBSTANTIVE CHANGE

EXECUTIVE BRANCH PERSONNEL PUBLIC FINANCIAL DISCLOSURE REPORT [OGE FORM 278]

In early 2014, OIRA/OMB reviewed and approved a three-year extension under the Paperwork Reduction Act covering the new OGE Form 278e to be incorporated in the new *Integrity* e-filing application, as well as the existing OGE Form 278 PDF and 278 Excel spreadsheet versions. The most significant difference between the 278 PDF and 278 Excel versions is that the 278e is a streamlined, rendered report format that presents only the filer's data inputs in a given category, eliminating categories not applicable to the specific filer. Otherwise all three approved versions collect the same information and are similar in burden requirements. In anticipation of the launch of the *Integrity* e-filing application, OGE recently created a new, "standalone" Excel version of the 278 form that closely resembles the 278e rendered format. OGE proposes to introduce the 278e Excel version as soon as possible and shortly thereafter, to phase out the 278 PDF and 278 Excel versions.

OGE is proposing to do this primarily because of a desire for uniformity. In addition, OGE hopes that the new format will reduce confusion regarding the various versions of the form for ethics officials reviewing public financial disclosure reports, for Senate Committees considering PAS nominees, for filers preparing and submitting their own financial disclosure reports, and for members of the public requesting access to financial reports.