

U. S. OFFICE OF GOVERNMENT ETHICS
JUSTIFICATION FOR A NONMATERIAL/NONSUBSTANTIVE CHANGE
OGE FORM 278E EXECUTIVE BRANCH PERSONNEL
PUBLIC FINANCIAL DISCLOSURE REPORT
MAY 2020

In November 2019, the Office of Management and Budget reviewed and approved a three-year extension under the Paperwork Reduction Act of the OGE Form 278e Executive Branch Personnel Public Financial Disclosure Report. OGE will be issuing final rule amendments soon that revise the executive branch financial disclosure regulation at 5 C.F.R. §§ 2634.304 and 2634.907(g) to reflect the retroactive increase, applicable as of January 1, 2020, of the threshold for reporting of gifts, reimbursements and travel expenses for both the public and confidential report systems. The Ethics in Government Act and OGE regulations tie these increases to the increase in March 2020 by the General Services Administration of “minimal value” for purposes of the Foreign Gifts and Decorations Act to \$415 for the three-year period 2020-2022. *See* GSA, [FMR B-50](#), Foreign Gift and Decoration Minimal Value (2020). The new aggregation threshold for the reporting of gifts and reimbursements received from any one source on financial disclosure reports is “more than \$415”; items worth “\$166 or less” do not need to be counted towards that overall threshold.

These reporting threshold values are indicated on the OGE Form 278e in the instructions to Part 9: Gifts and Travel Reimbursements. OGE proposes to update these threshold values from “\$156” and “\$390” to “\$166” and “\$415,” respectively. These changes to the OGE Form 278e have no material effect on the burden to filers; rather, the changes simply update the form, including in *Integrity*, to provide the correct information to filers regarding the currently-applicable aggregation threshold for reporting gifts and travel reimbursements. OGE also proposes minor typological corrections in the instructions to Part 2 and Part 7, adding the word “as” on page 3 and the word “the” on page 8 and page 22 of the Excel version of the form.