

**U. S. OFFICE OF GOVERNMENT ETHICS**  
**JUSTIFICATION FOR A NONMATERIAL/NONSUBSTANTIVE CHANGE**  
**OGE FORM 278E EXECUTIVE BRANCH PERSONNEL**  
**PUBLIC FINANCIAL DISCLOSURE REPORT**  
**JULY 2023**

In November 2021, 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 now seeks to make several nonsubstantive changes to that form.

First, OGE proposes to update certain reporting thresholds stated on the form. On June 9, 2023, OGE issued final rule amendments that revise the executive branch financial disclosure regulation at 5 C.F.R. §§ 2634.304 and 2634.907(g) to reflect the increased thresholds, applicable as of January 1, 2023, for reporting of gifts and travel reimbursements for both the public and confidential financial disclosure systems. The Ethics in Government Act and OGE regulations tie the increase of these values to the General Services Administration’s March 2023 redefinition of “minimal value” for purposes of the Foreign Gifts and Decorations Act. *See* Gen. Servs. Admin., GSA Bull. FMR B-52, Foreign Gift and Decoration Minimal Value (2023). The new aggregation threshold for the reporting of gifts and travel reimbursements received from any one source on financial disclosure reports is “more than \$480”; items worth “\$192 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 and examples to Part 9: Gifts and Travel Reimbursements, as well as in the Summary of Contents. OGE proposes to update these threshold values from “\$166” and “\$415” to “\$192” and “\$480,” respectively. These changes to the OGE Form 278e have no material effect on the burden to filers; rather, the changes simply update the form to provide the correct information to filers regarding the currently applicable thresholds for reporting gifts and travel reimbursements.

OGE also proposes adding two new instruments to the information collection, specifically Spanish and Chinese language translations of the form. These additional instruments are exact translations of the online version prepared and quality checked by National Language Service Corps. The purpose of the translations is to allow the public (who by law can request to view individuals’ completed forms using the 3209-0002) to understand what it is they are viewing. OGE does not intend to distribute a translated form to respondents, nor does it believe there are any respondents who will want to use a translated form. As these instruments are purely for reference purposes only, they will have no burden on filers.

Finally, OGE proposes updating a statutory citation based on the recent recodification of the Ethics in Government Act and fix a couple of other citations in the Privacy Act statement.