

**Financial Interests Required to be Reported on the
OGE Form 278e, Public Financial Disclosure Report
[SAF/GCA 1 Feb 22]**

The following is a list of the financial interests that must be reported on the OGE Form 278e but that are often omitted from the first draft of a filer's report. This is not an exclusive list of the information that must be reported.

**Filer's Positions Held Outside the U.S. Government
(all of your non-Federal Government positions, both paid and unpaid)**

- Trustee of any trust, including your own living trust
- Member of board of directors of non-profit organization
- Position with a professional organization
- Managing member of limited liability corporation (e.g., family LLC)
- Reservists/Guard – position (as employee or other) with current civilian employer, if not the Federal Government

Filer's Employment Assets & Income and Retirement Accounts

- CY 2021 earned income from any non-Federal government employer and name of employer
- Each underlying holding (stocks, mutual funds, municipal bonds, government bonds, etc.) in the following investment vehicles held by you
 - 401(k) account with a current or former employer
 - 403(b) account with current or former employer
 - Defined benefit plan with an entity other than the Federal Government

Filer's Employment Agreements and Arrangements

- Your continued participation in retirement plan(s) and other benefit plans with a former, non-Federal employer
- Reservists/Guard
 - Continued employment with current civilian employer and
 - Continuing participation in retirement plan(s) and other benefit plans with current employer, if not the Federal Government

Spouse's Employment Assets & Income and Retirement Accounts

- Spouse's employer (add description of line of business if not publicly traded company)
- Spouse's business (sole proprietorship, S Corp, etc.) and brief description of line of business
- Each underlying holding (stocks, mutual funds, municipal bonds, government bonds, etc.) in the following investment vehicles held by your spouse:
 - 401(k) account with a current or former employer
 - 403(b) account with current or former employer
 - Defined benefit plan with an entity other than the Federal Government

Other Assets and Income

- Diversified mutual funds – full name is required
- Sector mutual funds – full name is required
- Exchange-traded funds – full name is required
- Stocks – full name is required
- Bonds – corporate, municipal, government
- Each underlying holding (stocks, mutual funds, municipal bonds, government bonds, etc.) in the following investment vehicles held by you, your spouse, your dependent child:
 - Individual retirement account (IRA)
 - Brokerage account
 - Managed account (e.g., First Command accounts, USAA accounts)
 - Asset management account
 - Any other investment account
 - Variable annuity
 - Variable life insurance
 - TIAA-CREF account
 - 529 or college savings plan – it is sufficient to report name of specific portfolio you/your spouse chose for plan and name of state/financial institution offering plan. *Example: Virginia 529 plan – 2030 Portfolio*
 - Trust created by you, your spouse, or your dependent child
 - Irrevocable trust if you, your spouse, or your dependent child is beneficiary

NOTE: The above accounts/plans do not qualify as excepted investment funds under the Federal financial disclosure regulation. This determination has been made by the U.S. Office of Government Ethics, the agency that wrote the regulation and that is responsible for enforcing the disclosure requirements. The holdings of each of these accounts/plans must be listed on the report. An entry with only the name of the managed account portfolio (such as First Command AMS Core Investment Portfolio) is not sufficient. Each mutual fund in the account must be listed.

- Rental income from real estate
 - Did you sell rental property during the reporting period?
 - Report rental income received prior to sale of the property (Other Assets section).
 - Because you no longer own the property, select “none” as the value of the property.
 - Report the capital gains (if any) from the sale of the property.
 - Report the date and the amount of the sale of the property on the Transactions section.
- Capital gains from sale of stocks or mutual funds (include dividends, if any, paid before the sale)
- Brief description of line of business for stock that is not publicly traded
- Undeveloped land, even if not income-producing
- Royalties, advances for books and other published materials
- Cryptocurrencies

Liabilities

- PAS and GOs only – mortgage on your personal residence (including primary residence, vacation home, second family home)

Transactions

Clarification about what to report

- Purchases and sales of real estate, mutual funds, cryptocurrencies, municipal and corporate bonds, and stocks not previously reported during the year on the monthly periodic transaction report (OGE Form 278-T), if the individual purchase or sale exceeded \$1,000
 - If you did not timely report a stock transaction on a 278-T, you are subject to the late filing fee.
- **Exchanges are rare.**
 - **An exchange for purposes of the financial disclosure regulation generally occurs when one company acquires another. The shareholders of the acquired company are often given the option to sell their shares to the acquiring company or exchange their existing stock for stock of the acquiring company. Exchanges are always reported in pairs.**
 - Virtually any other transaction will be either a purchase or a sale.
 - Your financial statements may use the term “exchange” when referring to the sale of one mutual fund and the purchase of another mutual fund to replace the sold fund. This is not an “exchange” for purposes of the 278e, but a sale and a purchase. The financial community uses the term “exchange” differently than the financial disclosure regulation uses that term. Consult your ethics official if you have questions.