



278 FILING MADE EASY ADVANTAGES OF A SMART APPROACH

WHO MUST FILE A 278

- Employees in Senior Executive Service
- Federal employees earning over 120% of minimum rate for GS-15
- Uniformed officers at or above O-7
- Administrative law judges
- Political appointees and their assistants
- President, Vice President, presidential nominees, & civilians in Office of the President

WHEN TO FILE A 278

- Required every year by May 15
- When starting a new position (without a current 278 on file)
- When leaving a position (after which a 278 is no longer required, e.g., retiring)

WHAT MUST BE FILED IN A 278

Note: All of these must be reported not only for the federal employee but for his/her spouse and dependent children as well.

- All positions (excluding TSP) with a fair market value over \$1000 or for which a dividend, royalty, interest, or capital gain was paid resulting in \$200 or more of income; values of the position and distributions are also reported
- All property, stock, bond, commodity, etc. transactions over \$1000 including the amounts
- All bank accounts over \$5000 and rare coins held for investment including the amounts
- All gifts, reimbursements, and travel expenses totaling more than \$350 from one source excluding official travel
- All liabilities over \$10,000 excluding auto (unless loan exceeds purchase price) and residence (unless rented); the highest loan balance during the year is reported, not the balance at the end of the year
- All agreements or arrangements for employee benefits from a former employer, continuing payment from a former employer, leaves of absence, or future employment
- Positions held outside of the US Government
- All compensation over \$5,000 from one source

For most, filing a 278 financial disclosure form is an annual time-consuming and onerous task for federal employees and military personnel often in positions of significant responsibility or highly compensated ones.

First, one must gather all the information to be filed (see *sidebar to the left for the type of information required*). Second, one must complete the form and its four schedules. Third, depending on the specific agency, the completed 278, along with its schedules, may need to be reviewed by agency attorneys and/or other ethics officials before final submission and possibly revised with additional clarifications based on their feedback.

At ClearLogic Financial, we manage all of our client's financial assets under one umbrella reporting system, e.g., outside accounts (brokerage, IRAs, employer, etc.). Using this system, we run a single report to list almost all the items required on the 278. For federal employees filing a 278, this means only minimal information needs to be gathered for a few remaining items which we request by email.

ClearLogic also uses a sophisticated investment approach to eliminate hundreds of potential conflicts of interest, thereby streamlining the listing of assets. Our primary focus is on detailed financial planning and management in preparation for, transition into, and throughout retirement. As a result, we opt for long-term, cautious investment strategies that are blended using low-cost, diversified mutual funds. The nature of these funds simplifies the detailed reporting required for the 278.

As part of our service to handle "all things financial" for our clients, ClearLogic prepares 278 forms for each of our federal and military clients. We consider it part of our professional role to make all financial matters easy for our clients. For the 278 specifically, we run the necessary reports and prepare it and all its schedules.

A federal employee client then reviews the form 278 for accuracy and we update it accordingly. The form is then signed and submitted. In addition to saving a lot of time, our client gains peace of mind knowing his or her 278 financial disclosure form was professionally and properly prepared.

About ClearLogic Financial For Federal Employees & Retirees

ClearLogic has extensive experience with federal and military employment requirements since half of our clients are federal employees or retirees. We provide our federal-employee clients comprehensive advice on their irrevocable decisions just prior to retirement as well as during their working years and throughout their retirement. We help clients clearly understand their options – so they can make the best choices – regarding:

- TSP, FERS, & CSRS pension plan options
- tax smart distribution planning
- social security options
- saving for & transitioning into retirement
- estate planning & administration
- investment management