

STOCK Act Requirements for OGE-278 Filers

The Stop Trading on Congressional Knowledge (STOCK) Act was signed into law on April 4, 2012. The Act requires OGE-278 report filers to notify the NIH if: 1) they enter into post-government employment negotiations or an agreement for future employment or compensation; and/or 2) make certain transactions. The STOCK Act also requires the NIH to submit for posting on a central federal government website its employees' OGE-278 and 278-T reports. This requirement is currently under review. More information on STOCK Act can be found at <http://ethics.od.nih.gov/topics/STOCK/StockAct.htm>.

New requirements	OGE-278-T: Report of Financial Transactions	Employment Negotiation and Recusal Statement
What to report	<p>Purchases, sales or exchanges by you, your spouse, or dependent child of stocks, bonds, commodity futures, and other securities exceeding \$1,000.</p> <p>EXCEPT:</p> <ul style="list-style-type: none"> - Excepted investment funds (EIFs) including mutual funds - Cash accounts - Life insurance and annuities - Real property - Treasury securities 	<p>Employment negotiations or agreements with non-Federal entities for future employment or compensation:</p> <ul style="list-style-type: none"> - Name of non-federal entity or entities - Date negotiation or agreement began - Signature
When to file	<p>OGE-278-T is due on or before the 15th of every month in which a reportable transaction occurs unless an extension is granted by the DEC.</p> <p>By law, OGE-278 filers must report transactions within 30 days of receipt of notice, and no later than 45 days after a transaction occurs.</p> <p>*Negative reports are not required</p>	<p>Form is due within 3 business days of beginning negotiations or entering into an agreement for future non-federal employment or compensation.</p>
What to file	<p>OGE-278-T report (Fillable PDF with electronic signature, Excel, and Non-fillable PDF)</p>	<p>Notification of Post-Employment Negotiation or Agreement and Recusal Statement (Word and Fillable PDF with electronic signature capability)</p>
How to file	<p><u>ONLY SENIOR REPORTS ARE TO BE FILED WITH NEO:</u></p> <p>Electronic reports may be signed, scanned, and sent via email to your NEO Ethics Specialist.</p> <p>Hard copy reports may be sent to: NIH Ethics Office 2 Center Drive, 2 / BE-15 Bethesda, MD 20892</p> <p>*Non-Top 5 Reports should remain within the IC and be filed with your IC Ethics Office.</p>	

Note regarding negotiations or agreement for future employment or compensation: All employees are required to immediately disqualify (recuse) themselves from matters involving a person or entity with whom they are seeking or negotiating employment or compensation, unless a waiver (for negotiating future employment or compensation) or authorization (for seeking future employment or compensation) is granted. Seeking employment includes unsolicited communications by the employee regarding possible employment and any response other than rejection of an unsolicited communication from an employer. Negotiations begin (and the Notification of Post-Employment Negotiation or Agreement and Recusal Statement is required) when an employee enters into a discussion or communication with another person or entity (or agent) with an aim to reach an agreement regarding possible employment or compensation with that person or entity.