

STOCK Act Requirements for OGE 278e Filers

The Stop Trading on Congressional Knowledge (STOCK) Act requires public financial disclosure 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. they, their spouse, or dependent child(ren) make certain transactions through filing of a Periodic Transaction Report (OGE 278-T).

More information on the STOCK Act can be found on the [NIH Ethics Program Website](#)

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(ren) 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 diversified and sector mutual funds • Cash accounts • Life insurance and annuities • Real property • Treasury securities <p>(Negative reports are <u>not</u> required)</p>	<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 <p>Note: Also applicable to compensation for services to be rendered following termination, for example, a speaking engagement or a book deal under which writing will commence after termination.</p>
When to file	<p>OGE 278-T is due on or before the 15th of the month and must disclose transactions:</p> <ul style="list-style-type: none"> • that occurred during the previous calendar month • that occurred during the first fourteen days of the current calendar month if the filer has received notice of them <p>Note: A report submitted more than 30 days after it was due (taking any granted extension into account) is subject to a \$200 late fee. Please contact your IC ethics official if you have questions on report due dates, extensions, or late fees (see OGE LA-13-09).</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> <p>Note: Filers are encouraged to file before negotiations have commenced and/or agreement for future employment or compensation is reached.</p>
What to file	Periodic Transaction Report (Form OGE 278T)	Notification of Future Employment Discussions or Agreement and Recusal Statement
How to file	<p>Submit your OGE 278-T by using the NIH Enterprise Ethics System (NEES).</p> <ul style="list-style-type: none"> • If you experience technical difficulties logging into NEES you can use the OGE 278-T pdf form. • Non-Senior Employees - file your electronically signed form with your IC Ethics Office. • Senior Employees - email your electronically signed form to the NEO Action Coordinator inbox at neoactioncoordinator@mail.nih.gov with a cc to your NEO Ethics Specialist. <p>Note: There is a known issue with NEES using Internet Explorer so please use Chrome or Firefox.</p>	<p>Submit your Notification of Future Employment Discussions or Agreement and Recusal Statement via email.</p> <ul style="list-style-type: none"> • Non-Senior Employees - file your electronically signed form with your IC Ethics Office. • Senior Employees - email your electronically signed form to the NEO Action Coordinator inbox at neoactioncoordinator@mail.nih.gov with a cc to your NEO Ethics Specialist.

* 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.