

NIH MANUAL 2300-735-1 APPENDIX 2  
ILLUSTRATION 4  
DATE: 06/19/98  
ISSUING OFFICE: OHRM, 496-4851

**AVOIDING CONFLICTS OF INTEREST  
Executive Branch Personnel Public Financial  
Disclosure Reporting System (SF 278)  
Helpful Hints for SF 278 Filers and Reviewers**

**SCHEDULE A**

Filers must report each asset held in an Individual Retirement Account (IRA) or "Keogh" plan if the asset meets either of the reporting thresholds -- a fair market value exceeding \$1,000 at the close of the reporting period or over \$200 of income during the reporting period. IRAs and Keoghs are retirement vehicles which hold investment assets. Note that a specific investment which is a fund may qualify as an "excepted investment fund" under the rules discussed in the instructions to the form. The portfolios of such funds need not be reported.

The name, location, and line of business or investment holdings of any partnership of reportable value or income must be supplied.

The full specific name of each reported mutual fund, not just the fund's family name, must be provided. For instance, "Fidelity investment fund" is not specific enough; "Fidelity Magellan Fund" should be indicated if that is the full name of the particular fund held.

Asset valuations reported should reflect each asset's value at the close of the reporting period. For an annual report, if an asset were completely sold before the end of the calendar year, the value checked under Block B, Valuation of Assets, should be "None" (any reportable income during the period of time covered would be recorded under Block C, Income; if there was no such income, no entry at all for the asset would be needed).

Accrued income, even if deferred or exempt for tax purposes, is reportable, and the category of amount of such income (or exact amount if required) should be listed. For example, an IRA invested in a bank deposit account that accrues \$400 in interest during the covered period must be reported since the accrued income exceeds \$200 in amount.

When the "other" column is used to describe a type of income, the actual amount of income must be reported. This includes any earned income other than that derived from current U.S. Government employment. However, in the case of a spouse's earned income, the source, but

not the amount (except for honoraria), has to be reported.

## **SCHEDULE B**

If bank or brokerage statements are included as part of annual or termination reports, they must reflect transactions (and income for Schedule A) with the necessary details for the entire reporting period, not solely for the last month or quarter of the period. Assets held must also be shown as of the end of the appropriate reporting period for Schedule A.

When sales are recorded on Schedule B, make certain that Schedule A reflects any corresponding capital gains, dividends and interest realized (if over \$200).

## **SCHEDULE C**

Generally, any reportable liabilities which exceed \$10,000 at any time during the reporting period must be reported with the category of value for the highest amount owed indicated. This section is not limited to those liabilities which exceed \$10,000 at the conclusion of the reporting period (except for revolving charge accounts).

## **SCHEDULE D**

The outside positions reported must include positions held at any time during the reporting period, even those from which the individual may have resigned before the close of the reporting period.