



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

January 30, 2009  
DO-09-004

## MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Robert I. Cusick  
Director

SUBJECT: Guidance on the Use of Digital Signatures with the Confidential Financial Disclosure Form

Agencies are now authorized to allow digital signatures on the electronically fillable PDF version of the confidential financial disclosure form (OGE Form 450) as long as their agency's Chief Information Officer (CIO) has approved a digital signature process. This authorization modifies OGE's previous requirement that use of digital signatures on the electronically fillable OGE Form 450 had to be in conjunction with an OGE-approved pilot program.

A CIO's approval of a digital signature process assures OGE that requirements of the Government Paperwork Elimination Act (GPEA), the E-sign law, and other applicable laws have been met. Additionally, a CIO approval assures OGE that agencies have addressed other issues such as security, verification and non-repudiation before moving forward with digital signature.

The use of digital signatures alone does not constitute an electronic filing system. The guidance for developing an electronic filing system remains unchanged and can be found in DAEOgram, [DO-07-014](#), Guidance on Electronic Filing of Public and Confidential Financial Disclosure Reports.

Additionally, agencies should not confuse authorization to use digital signatures on the electronically fillable PDF version of the OGE Form 450 with the requirement to seek OGE approval of alternative or supplemental confidential financial disclosure procedures. Agencies interested in developing these types of procedures, which deviate from the standard OGE Form 450, are still required to seek separate approval by OGE.

If you have any questions or comments about the content of this DAEOgram, please contact Jennie Keith, Government Ethics Specialist, at 202-482-9295 or at [vjkeith@oge.gov](mailto:vjkeith@oge.gov).