

**WHAT YOU DON'T KNOW CAN HURT YOU:  
CONSIDERATIONS BEFORE SELECTING AN  
E-FILING SYSTEM  
OGE CONFERENCE – ORLANDO, FL**



# *Electronic Filing at USDA and DOI*

**Presenters:**

**Stuart Bender—Director,  
Office of Ethics, USDA**

**Mike Edwards—Deputy Director,  
Office of Ethics**

**Craig Clark – Deputy Ethics  
Counselor, Bureau of Reclamation,  
DOI**

**Pam Miller – Ethics Analyst, Ethics  
Office, DOI**



“Could you spare a few minutes to help me file disclosure reports?”

# E-Filing: By the Numbers

## USDA:

700 OGE-278 Filers

16,000 OGE-450 Filers

## DOI:

300 OGE-278 Filers

10,000 OGE-450 Filers

... All across the country and  
the globe.



# The Problems

- All USDA and DOI filers submitted hard copies of their annual reports.
  - Expensive
  - Lack of consistency in agency
  - Challenge to provide good customer service
  - Lost reports
  - Filer frustration

# The Solution

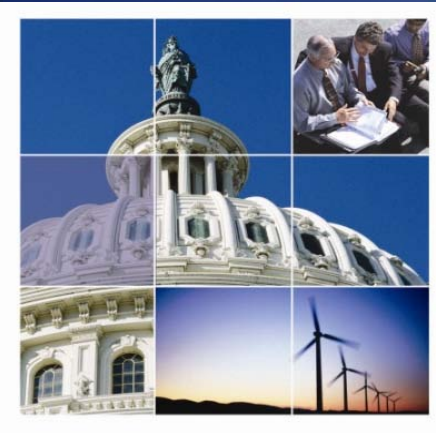
## Electronic Filing or “E-Filing”

- Filers gain flexibility, save time, save paper, and reduce expensive shipping costs.
- Reviewers provide better customer service and consistency increases throughout agency.

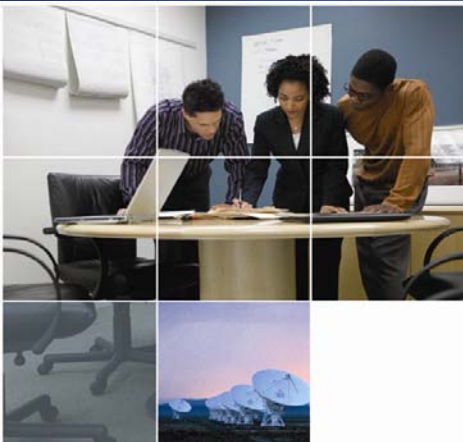
# The Solution

- **Starting January 1, 2011 USDA and DOI introduced E-Filing for OGE-278 and OGE-450 Filers**

# E-Filing: It Takes Teamwork!



**FDonline**<sup>TM</sup>



# E-Filing: It Takes Teamwork!





## Tangible Benefits to E-Filing: Eliminate Expensive Delivery Costs

With Paper Filing Hundreds of filers use UPS, DHL, or FedEx to ship their reports to us.

E-Filing will save thousands of dollars in delivery costs for the Government, plus there would be no delay in receipt.



## Environmentally-Friendly “Eco-Filing” “Green” Operations

**E-Filing** will eliminate the need for hard copy financial disclosure reports for virtually all USDA and DOI filers.

When fully implemented USDA and DOI will save approximately 125,000 pieces of paper every year!

Additional paper savings occur because employees would not need to keep or request paper copies of their forms.

## World-Wide Reach

Filers can use E-Filing from overseas locations via a secure site. This will assist filers across the nation and around the globe to efficiently and securely transmit their reports.



# E-Filing Plan of Action

- Step 1: Get Buy-In
- Step 2: Evaluate Software Options
- Step 3: Funding/Contracting Process
- Step 4: Train Top Level Ethics Staff
- Step 5: Train All Ethics Staff
- Step 6: Increase Agency Buy-In
- Step 7: Set Up Support Infrastructure
- Step 8: Execution
- Step 9: Lessons Learned

# Step 1: Get Ethics Staff Buy-In

- Create Ethics Staff Stakeholders
- Create Ethics Staff Cheerleaders
- Set Expectations
- Start Agency Buy-In Process
- Express Benefits
  - Better Customer Service
  - Teleworking
  - Consistency
  - Efficiency



## Step 2: Evaluate Software Options

- **Talk to Other Agencies Ethics Programs, see what they use, conduct site visits and demos**



# Government E-Filing Systems

	Agency	SF 278	OGE Form 450	Contact(s)	Telephone	E-mail
1	Department of the Army (FDM)	X	X	George Hancock	(703) 696-5512	<a href="mailto:George.Hancock2@hqda.army.mil">George.Hancock2@hqda.army.mil</a>
2	Federal Deposit & Insurance Corporation (NEETS II)	X	X	Robert Fagin	(202) 898-6808	<a href="mailto:rfagan@fdic.gov">rfagan@fdic.gov</a>
3	National Aeronautics & Space Administration	X	X	Adam Greenstone	(202) 358-1775	<a href="mailto:adam.f.greenstone@nasa.gov">adam.f.greenstone@nasa.gov</a>
4	National Science Foundation		X	Robin Fritsch	(703) 292-7854	<a href="mailto:rfritsch@nsf.gov">rfritsch@nsf.gov</a>
5	Office of the Director of National Intelligence	X	X	Claudia Nadig	(703) 275-2502	<a href="mailto:claudia.nadig@ugov.gov">claudia.nadig@ugov.gov</a>
6	Nuclear Regulatory Commission	X	X	John Szabo	(301) 415-1610	<a href="mailto:jls.nrc.gov">jls.nrc.gov</a>
7	Central Intelligence Agency	X	X	Karla Anthony	(703) 482-4066	<a href="mailto:karlala@ucia.gov">karlala@ucia.gov</a>
8	DHHS/Center for Medicare and Medicaid Services	X	X	Joseph Dion	(410) 786-8022	<a href="mailto:Joseph.Dion@CMS.hhs.gov">Joseph.Dion@CMS.hhs.gov</a>
9	DHHS/National Institutes of Health	X	X	Traci Melvin	(301) 402-6628	<a href="mailto:melvint@mail.nih.gov">melvint@mail.nih.gov</a>
10	National Security Agency	X	X	Kimberly Ann Proctor	(443) 479-0728	<a href="mailto:kaproctor8@verizon.net">kaproctor8@verizon.net</a>
11	U.S. Postal Service		X	Helen Grant	(202) 268-3077	<a href="mailto:helen.r.grant@usps.gov">helen.r.grant@usps.gov</a>
12	DOJ/EOUSA	X		Lucy Hurley	(202) 616-1227	<a href="mailto:Lucy.Hurley@usdoj.gov">Lucy.Hurley@usdoj.gov</a>
13	NTIS/Department of Commerce (FDOnline)	X	X	Patricia Gresham	(703) 605-6123	<a href="mailto:pgresham@ntis.gov">pgresham@ntis.gov</a>

and there are probably more. . .

# Step 2: Evaluate Software Options

- Data Secure and accessible
- Filer-Friendly
- Allows importing data from previous report
- Delivered over the web
- Reviewer-friendly
- Affordable
- Leads to 450s and 278s that meet regulatory criteria (e.g. allows asset “collections” on Schedule A)
- Provides necessary reports for your office and OGE
- Automated password resets





# Step 3: Funding/Contracting Process

- Presenting Proposal to Agency Decision Makers
- In a time of tight budgets, you will need to show that E-Filing:
  - Is a time saver for your filers – hours of time saved
  - Is a time saver for your reviewers to more quickly identify potential conflicts of interest
  - Will reduce express shipping / delivery costs



# Step 4: Train Top Level Staff

- Continue to Get Ethics Staff Buy-In
- Continue to Make Ethics Staff Stakeholders
- Ensure Consistency
- Log In
- Get Feedback



# Step 5: Train All Ethics Staff

- Ensure Competency Throughout Agency
- Involve Software Partner
- Start Early



# Step 6: Increase Agency Buy-In

- Start Early
- Part of Annual Ethics Training
- Benefits Talking Points
  - Telework Flexibility
  - Time Saver
- Set Reasonable Expectations
- Invite Feedback/Empower Stakeholders
- Address Security Concerns



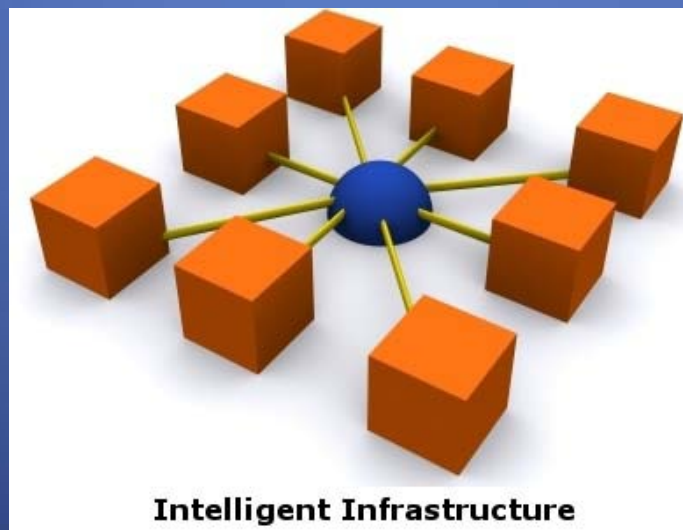
Slide from 2009/2010 DOI Ethics Town Hall Series

What is your opinion of requiring financial disclosure filing?

1. Effective means of deterring conflicts of interest
2. It's complicated and ineffective
3. It is a complete waste of time
4. Save the trees; we should be able to file electronically

# Step 7: Set Up Support Infrastructure

- Announce E-Filing on Ethics Website
- Create FAQs for Filers and Reviewers
- Develop Customer Service Procedures
- Create a Clear Chain of Command



# Step 8: Execution

- Be Prepared for the Onslaught
- Have Patience
- Set Up Regular Agency Support Calls for Ethics Staff
- Involve Software Partner
- Kill Them With Kindness
- Invite Feedback



# Step 9: Lessons Learned

- Implement User Suggestions
- Create Focus Groups
- Create Reviewer User Group
- Revise Business Plan
- Work With Vendor





# Major Benefit: Decrease Follow Up Questions

E-Filing is an “intelligent system” which prompts filers to properly prepare their reports. This will result in less need for reviewer follow up with filers.



# Major Benefit: Better Management Controls

Supervisors will be able to see statistics on filing, and the productivity and timeliness of report reviews and certification--all from a secure web page. The web page would also allow management to reallocate reports among available ethics specialists to aid timely review.



# Major Benefit: Better Customer Service

Reviewers can more easily access filings and provide real-time support to filers. Ethics Office can respond quickly and efficiently to audit inquiries.



**Major Benefit:**  
**Increased Institutional Integrity**

Filings are pre-screened for conflicts based on agency parameters. Timeliness of review can be better monitored across agency. Contact with filers needing follow-up can be tracked to ensure timely resolution of any possible conflict of interest or filing delay.

# The Filer Perspective



“Just a little nap then I’m sure I’ll find what I need for that disclosure report. When is it due, again?”

# FDonline Filer Benefits

- “Help Section” and instructions always quickly available.
- Common mistakes avoided, less follow-up questions.
- Intuitive TurboTax<sup>®</sup> like intelligent interview wizard guides the filer through the complex maze of properly completing the financial disclosure paperwork.

# FDonline Filer Benefits

- Drop-down lists of stocks and mutual funds provide easy click and fill data entry.
- Automated notifications and reminders.
- Securely saves information from year to year. No losing or misplacing prior year's form.

# Easy Filer Invitation

The screenshot shows an email client window with a toolbar at the top containing icons for Reply, Forward, Delete, Move to Folder, Create Rule, Other Actions, Block Sender, Not Junk, Categorize, Follow Up, Mark as Unread, Find, Related, Select, Link to Record, and E-mail Auto-link. Below the toolbar, the email header shows the sender as DAEO.Ethics@dm.usda.gov and the subject as "E-Filing Invitation Letter--Incumbent Filers". The main body of the email contains the following text:

You forwarded this message on 4/7/2011 10:02 AM.

From: DAEO.Ethics@dm.usda.gov  
To: primeforce+oigpublic@verizon.net  
Cc:  
Subject: E-Filing Invitation Letter--Incumbent Filers

Sent: Wed 4/6/2011 10:00 PM

Dear JohnOIGPUBLIC Martin,

The Department of Agriculture is using an online electronic filing (e-filing) system for you to file your public financial disclosure report (SF 278). If you have already filed a paper copy and do not wish to enter your information this year electronically, please reply to this e-mail and let us know. If you have already filed a paper copy report for this year and wish to also file electronically, there is no need to notify us. The benefit of filing electronically is that your information will be available for your report next year and will save you time preparing your annual report next year. In addition, it will make your report available to you online all year if you need to access it for any reason.

There will be a further e-mail coming out in a few days that will notify you of resources and online training, should you want it. This electronic filing program is designed to be simple, however, and so you may find that you will not need any training. Nonetheless, we put this in place to further assist you, our filer.

To get started on your annual report now, please click the following link and follow all instructions: <https://fdonline.ntis.gov/oge450/formworx/client/CheckToken.do?token=1651607f849e91360f1cd6ae33b41028>.

Once you have completed entering your data in the automated program, you will be prompted to submit your form to complete the process. The action of submitting the form generates an electronic signature that certifies that the information you provided on the form is true, complete, and correct to the best of your knowledge. The form is then transmitted directly to the Office of Ethics for review. The due date for this filing is: 05/16/2011.

Because of the timing of the implementation of the e-filing program, requests for extensions of time to file will be liberally granted. (Extensions must be requested prior to your filing due date.)

Questions regarding electronic filing or requests for extensions should be directed to the Office of Ethics at (202) 720-2251 or you may simply reply to this e-mail. Additionally, a list of USDA ethics officials is available at USDA's ethics website: <http://www.usda.gov/ethics>; just click on "Ethics Advisor Locator."

Best regards,

Stuart Bender  
Director  
Office of Ethics  
Office of Human Resources Management  
Office of the Assistant Secretary for Administration

A blue arrow points from the "Click Here" button at the bottom of the page to the URL in the email body.

Click Here



# Friendly (but Automated) Reminders

Dear Michael Edwards,

If you have received this message, it is because our records indicate that you have not completed your Public Financial Disclosure Report. Your filing is due on 05/16/2011. To access the automated financial disclosure application, please click the following link and follow the instructions:  
<https://fdonline.ntis.gov/oge450/formworx/client/CheckToken.do?token=7f7e61516577f3a1e13b0c75a6591023>

Please direct any questions or requests for an extension of time to file your report to the appropriate ethics official. (Extensions must be requested prior to your filing due date.) Your ethics official is listed in our records as Andrew Tobin and may be contacted at [Andrew.Tobin@dm.usda.gov](mailto:Andrew.Tobin@dm.usda.gov). If you wish, you may also hit "Reply" and respond to this e-mail. Additionally, a list of USDA ethics officials (and lots of other helpful ethics information) is available at: <http://www.usda.gov/ethics>; just click on "Ethics Advisor Locator."

Regards,

USDA Office of Ethics  
Office of Human Resources Management  
Office of the Assistant Secretary for Administration

# Filer Help and Instructions Available

The screenshot shows a Windows Internet Explorer browser window displaying the FdOnline website. The address bar shows the URL: <https://fdonline.nhs.gov/oge450/formworx/client/Start.do>. The page features the USDA logo in the top left corner. The main heading is "FdOnline" with a sub-heading "What To Expect". Below this, there is a paragraph of text explaining the system's purpose and a "Save & exit" button. To the right, a "Go back" and "Continue" button are visible. A dropdown menu is open on the right side, listing various help topics. A red arrow points from the main title to the "Help" menu item.

**USDA**

## FdOnline

### What To Expect

The Electronic Financial Disclosure system will automatically walk you through filling out your Financial Disclosure Form. The system will let you know what you are to report and what is not necessary to report. After all the necessary questions are answered, you will electronically submit the form. You will also be able to save the form for your own records. You are strongly urged to retain a copy for your own records.

- Help
- Change password
- OGE-278 Instructions
- OGE 278 Form
- Penalties
- Public Burden Information
- Who Must File?
- When Must I File?
- What is the Reporting Period?
- Frequently Asked Questions

Version 2.20 (20110401-165824)  
Based on Formwork version 2.20 (20110328-230313)  
Copyright © 2004-2011 HHS/OPX LLC  
All rights reserved.  
[View Data](#)

Windows taskbar: Start, Internet Explorer, Firefox, Outlook, Microsoft Exchange, InvoicationLet..., Microsoft Ex..., Inbox - Micro..., OE Ethics Co..., E-Filing Invit..., RE: E-Filing I..., FW: Travel - ..., E-Filing Invit..., Microsoft Po..., Speaker, FdOnline - ... 11:00 AM

# Look Ma No Forms!

**USDA**

### FDonline

Personal Information - Work Information

\* = required field.

E-Mail Address \*

Position/Title \*

Grade/Pay Band \*

Agency \*

Branch/Unit/Routing Symbol \*

Work Address Street \*

Work Address Suite

Work Address City \*

Work Address State \* (Select)

Work Address Zip Code \*

Work Address Country \* United States

Work Telephone # \*  (Use 999-999-9999 format.)

Drop-downs and default information .

Required fields clearly shown

Save & exit Start Over Go back Continue

Version 2.20 (20110401-165824)  
Based on FormWork version 2.20 (20110328-230333)  
Copyright © 2004-2011 [HRWorkX LLC](#).  
All Rights Reserved.  
[View Data](#)

# Many Mistakes Caught Before Filing

The screenshot shows a Windows Internet Explorer browser window displaying the Fdonline website. The address bar shows the URL: <https://fdonline.nbis.gov/oge450/formworx/client/Input.do>. The page title is "Fdonline - Windows Internet Explorer". The browser's Favorites bar includes links to IEC Journal, Verizon Yahoo!, New Tab, Fdonline, and Ogdline. The main content area features the USDA logo and the heading "Fdonline". Below this is a sub-heading "Personal Information - Work Information" with a progress indicator at 0%. A yellow error box contains the following text: "Position/Title is required. Grade/Pay Band is required. Agency is required. Branch/Unit/Routing Symbol is required. Work Address is required. City is required. State is required. Zip is required. Work Telephone # is required." Below the error box, a form is displayed with the following fields: "E-Mail Address" (filled with "mikem.edwards@dm.usd"), "Position/Title", "Grade/Pay Band", "Agency", "Branch/Unit/Routing Symbol", "Work Address Street", "Work Address Suite", "Work Address City", "Work Address State" (dropdown menu), "Work Address Zip Code", "Work Address Country" (dropdown menu, filled with "United States"), and "Work Telephone #" (with a note "(Use 999-999-9999 format.)"). At the bottom of the form are buttons for "Save & exit", "Start Over", "Go back", and "Continue". The footer of the page includes version information: "Version 2.20 (20110401-165824)", "Based on Formwork version 2.20 (20110228-230333)", "Copyright © 2004-2011 ePROX LLC", "All Rights Reserved.", and a "View Data" link. The Windows taskbar at the bottom shows the Start button and several open applications, including "InvitationLette...", "Fdonline Produ...", "Microsoft Excel...", "Inbox - Micro...", "RE: E-Filing Inv...", "RE: E-Filing Inv...", "ME\_E-Filing.ppt", "Fdonline Logos...", and "Speaker". The system clock shows "1:50 PM".

# Easy Lookup for Stocks / Mutual Funds

The image shows a screenshot of the USDA FDonline website. The main page is titled "FDonline" and "OGE278: Executive Branch Personnel Public Financial Disclosure Report - Schedule A". It contains a form for entering stock information. A blue arrow points from the "Stock Symbol" field to a search results window. The search results window shows a list of stocks with columns for "Symbol" and "Company name".

**USDA**

## FDonline

OGE278: Executive Branch Personnel Public Financial Disclosure Report - Schedule A

\* = required field.  
Enter stocks worth more than \$1,000 at the end of the reporting period or that produced income greater than \$200 during the reporting period.  
Enter a specific stock. Indicate the full name of each stock.

Stock Symbol \*  (lookup)

Name \*

Value \*

Income type  Dividends  
 Rent or Royalties  
 Interest  
 Capital Gains  
 Other

Type:

Amount:   
(Use XXXXX.XX format. Do not use commas.)

Income amount \*

Still held at the end of current reporting period? \*

Yes  
 No

Held by:  Self only  
 Joint  
 Spouse only  
 Dependent child

Save & exit Start Over

**FDonline - Windows Internet Explorer**

https://fdonline.n.

File Edit View Favorites Tools Help

USDA

## FDonline

### Stocks

Symbol  starts with  Search Show All Close

Symbol Company name

8098 records found ; displaying 1 to 25.

First Prev 1 2 3 4 5 6 7 8 9 10 11 Next Last

Symbol	Name
<a href="#">A</a>	Agilent Technologies Inc.
<a href="#">AA</a>	Alcoa Inc.
<a href="#">AA.P</a>	Alcoa Inc.
<a href="#">AAC</a>	Ableauctions.Com Inc
<a href="#">AACCC</a>	Asset Acceptance Capital Corp.
<a href="#">AAI</a>	AirTran Holdings Inc.
<a href="#">AAME</a>	Atlantic American Corporation
<a href="#">AAN</a>	AARON'S INC.
<a href="#">AAN.A</a>	AARON'S INC. CLASS A
<a href="#">AANB</a>	Abigail Adams National Bancorp Inc.
<a href="#">AAON</a>	AAON Inc.
<a href="#">AAP</a>	Advance Auto Parts Inc
<a href="#">AAPL</a>	Apple Inc.
<a href="#">AAR</a>	AMR Corporation
<a href="#">AATI</a>	Advanced Analogic Technologies Inc.
<a href="#">AAU</a>	Almaden Minerals Ltd.
<a href="#">AAV</a>	ADVANTAGE ENERGY INCOME FUND

Go back Continue

# When Complete Print / Submit

https://fdonline.nts.gov/oge450/formworx/client/Form.do?name=us/gov/oge/0GE278&file=Form1-1302 - Windows Internet Explorer

https://fdonline.nts.gov/oge450/formworx/client/Form.do?name=us/gov/oge/0GE278&file=Form1-1302551639054.pdf

File Edit Go To Favorites Help

Favorites Metro Lobbying Yahoo AgLearn Dictionary Dirs GrammarRight Lex MAEAs OE OGE Refs Srch Telephone Time & Attendance USDA Directives Wivi Webs GovTrip Ethics E-Filing Initiative

https://fdonline.nts.gov/oge450/formworx/client/For...

1 / 5 75% Find

OGE Form 278 (Rev. 09/2010)  
5 C.F.R. Part 2636  
U.S. Office of Government Ethics

**Executive Branch Personnel PUBLIC FINANCIAL DISCLOSURE REPORT**

Form Approved:  
OMB No. 3299-0001

Report of Appointments, Calendar Year, or Termination (Month, Day, Year) Reporting Status (Check Appropriate Item) <input checked="" type="checkbox"/> Incumbent <input type="checkbox"/> Calendar Year Covered by Report: 2010 <input type="checkbox"/> New Entrant, Nominee, or Candidate <input type="checkbox"/> Termination <input type="checkbox"/> Termination (not if Applicable) (Month, Day, Year)	First Name and Middle Initial Michael	Last Name Edwards	Department or Agency (If Applicable) USDA	Telephone No. (Include Area Code) 202-720-2251	Address (Number, Street, City, State, and ZIP Code) 1400 Independence Ave SW Washington DC 20250	Title of Position Deputy Director Office of Ethics	Position(s) Held with the Federal Government During the Preceding 12 Months (If Not Same as Above) Washington DC 20250	Name of Congressional Committee Considering Nomination Do You Intend to Create a Qualified Diversified Trust? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Signature of Reporting Individual Date (Month, Day, Year)	Signature of Other Reviewer Date (Month, Day, Year)	Signature of Designated Agency Ethics Official Date (Month, Day, Year)	Signature Date (Month, Day, Year)	<b>Fee for Late Filing</b> Any individual who is required to file this report and does so more than 30 days after the date the report is required to be filed, or, if an extension is granted, more than 30 days after the last day of the filing extension period, shall be subject to a \$200 fee.	<b>Reporting Periods Incumbent.</b> The reporting period is the preceding calendar year except Part II of Schedule C and Part I of Schedule D where you must also include the filing year up to the date you file. Part II of Schedule D is not applicable.	<b>Termination Filers.</b> The reporting period begins at the end of the period covered by your previous filing and ends at the date of termination, Part II of Schedule D is not applicable.	<b>Nominees, New Entrants and Candidates for President and Vice Presidents</b> Schedule A—The reporting period for income (BLOCK C) is the preceding calendar year and the current calendar year up to the date of filing. Value assets as of any date you choose that is within 31 days of the date of filing. Schedule B—Not applicable.	<b>Schedule C, Part I (Liabilities)—</b> The reporting period is the preceding calendar year and the current calendar year up to any date you choose that is within 31 days of the date of filing.	<b>Schedule C, Part II (Agreements or Arrangements)—</b> Show any agreements or arrangements as of the date of filing.	<b>Schedule D—</b> The reporting period is the preceding two calendar years and the current calendar year up to the date of filing.
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Comments of Reviewing Officials (If additional space is required, use the reverse side of this sheet)

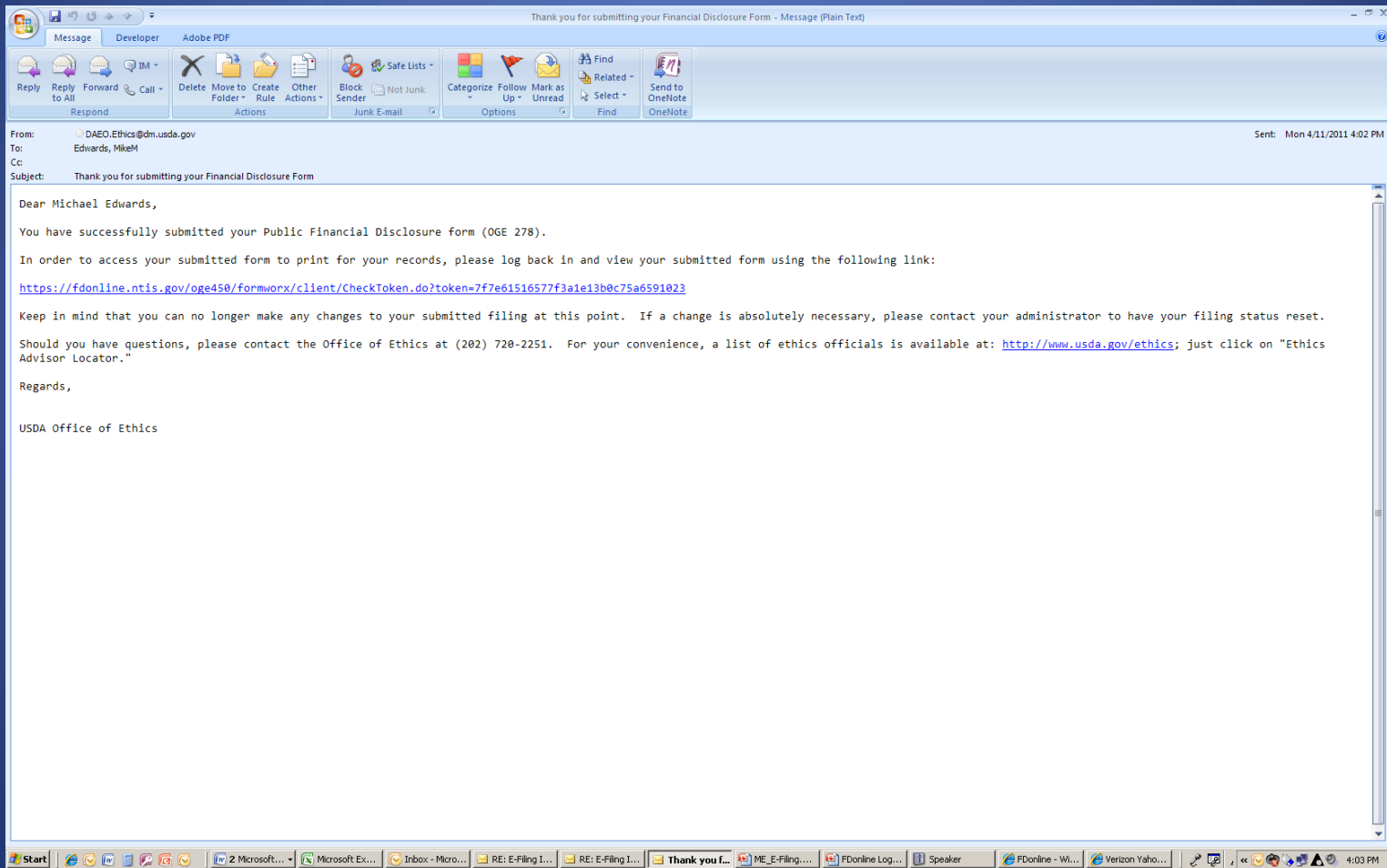
See attached page(s) (Check box if filing extension granted & indicate number of days \_\_\_\_\_)

(Check box if comments are continued on the reverse side)

Supersedes SF 278 Edition:

Start Microsoft Ex... In-box - Micro... RE: E-Filing I... RE: E-Filing I... ME\_E-Filing... FDonline Log... Speaker Online - Wi... Verizon Yaho... https://do... 3:58 PM

# Confirmation of Filing / Form Locked



# Questions ?

