




# Financial Disclosure eFiling


A Small Agency's Journey  
NSF Initiative  
Robin Clay



## Initiative Description and Goals

- △ **Initiative Background:**
  - The Ethics in Government Act requires employees to file a public (SF 278) or confidential (OGE Form 450) financial disclosure statement based on their grade and the duties and responsibilities of their position.
  - The majority of NSF employees are required to complete financial disclosure forms given the amount of grant and contract management activity at NSF. Users were previously required to complete and submit hard copies of these reports to the Ethics Office.
- △ **Initiative Goals – to streamline and automate the financial disclosure process:**
  - Enable users to electronically file ethics reporting forms
  - Assist the Ethics Team in tracking, managing and organizing the submission and review process
- △ **Business Function Components:**
  - Forms
  - Filers (Key Stakeholders)
  - Business Process

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**Initiative Sponsors:**

Sponsors	Role
Robin Clay, OGC; Faith Hixson, OGC	Business leads for Financial Disclosure eFiling

**Key Support Teams:**

Team	Role
SharePoint Team	Site Development and maintenance
Abigail Marchetti, DIS; Gartner, DAS; Edillon, DAS; Rhinehart, DAS; SharePoint Technical Team	
Communications Team	Communications, emails, flyers, posters and roll out plan
IT Help Central	Technical support

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## Business Function Overview: Forms


► **Forms:**

► The two forms affected are the "Executive Branch Confidential Financial Disclosure Report" (OGE Form 450) and the "Executive Branch Public Financial Disclosure Report" (SF 278)

Form	Filer Type	Filing Deadline	Approx. # of NSF Employees Affected
<b>OGE Form 450</b> "Executive Branch Confidential Financial Disclosure Report"	New Entrant	Within 30 days of appointment	n/a
	Annual	January 1 and February 15	900
<b>SF 278</b> "Executive Branch Public Financial Disclosure Report"	New Entrant	Within 30 days of appointment	n/a
	Annual	January 1 and May 15*	200
	Terminated	Within 30 days of termination	n/a

\* \$200 late filing fee may be assessed for filing more than 30 days late

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## Business Function Overview: Filers (Key Stakeholders)

► Filers:

Filer Type	Stakeholder	Roles
OGE Form 450 Filers  (900 employees affected)	General Schedule Employees	GS Employees who can effect the interests of a non-Federal entity (e.g. Program Officers, COTRs, auditors, investigators)
	Visiting Scientists and IPAs	All IPAs AD4 and below equivalents All AD3 and AD4 Visiting Scientists
	Special Government Employees (SGEs)	All SGEs (unless filing SF 278)
SF 278 Filers  (200 Employees Affected)	Senior Executive Service (SES)	Members of the SES or holding some other position classified above the GS-15 level or its equivalent (AD-5 or above)
	IPAs	IPAs serving in a position normally classified as SES
	Special Government Employees (SGEs)	SGEs paid at a rate greater than 120% of the basic rate of pay for a GS-15 and who will serve for more than 60 days

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## Business Function Overview: Business Process

► Business Process Outline:

► Business process changes: Few changes were made to the business process. The most significant change is electronic submission, signing of financial reporting forms, and automatic reminders and notifications of delinquency through SharePoint

Current Process	New Process	Changes
1. Filer receives email from Ethics Team initiating reporting process	1. Filer receives email from Ethics Team initiating reporting process with instructions on reporting through SharePoint	Instructions are for reporting through SharePoint. Ethics Team sends email using SharePoint tools.
2. Filer completes a PDF version of the required form	2. Filer completes a PDF version of the required form	No Changes
3. Filer prints and signs form	3. Filer signs form electronically	Signature is now completed electronically.
4. Filer submits form by either: - Bringing form to Ethics office - Faxing form to Ethics office	4. Filer uploads PDF copy of form to SharePoint	Submission now occurs online.
5. Ethics Team reviews forms and contacts filer for additional information if necessary via phone or email	5. Ethics Team reviews form and contacts filer additional information if necessary via SharePoint	Ethics Team requests for additional information are now sent through SharePoint
6. Ethics Team follows up with delinquent filers via phone or email	6. Ethics Team follows up with delinquent filers via phone, email, or SharePoint	Ethics delinquency notices are now sent through SharePoint


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## Overview of Roll-Out Plan

- ▶ **The e-Filing system will be rolled out in two phases**
  - ▶ OGE Form 450 filing process
    - ▶ Jan. 12, 2009: Robin initiates process in SharePoint, filers receive e-mail notification of process initiation
    - ▶ Submission deadline is Feb. 15
  - ▶ SF 278 filing process
    - ▶ March 1, 2009: Robin initiates process in SharePoint, filers receive e-mail notification of process initiation
    - ▶ Submission deadline is May 15
- ▶ **The system sends notifications, confirmations and alerts to stakeholders throughout the process/lifecycle.**
- ▶ **Hard copy filing will not be necessary**

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## Key Dates

Summer 08    Fall 08    Dec. 08    Jan. 09    Feb. 09    Mar. 09    Apr. 09    May 09

Task Kick-off

Requirements/Design

Development

Internal Testing

Conflicts Official Testing begins 12/22/2008

ITBSS Testing Completed 1/7/09

Readiness Review 1/7/09

PIA Approved 1/6/09

Site open to 450 filing 1/12/09 –

**Dec. 08**


Conflicts Official Testing Complete 12/31/2008

**OGE Form 450 filing**

SF 278 filing

\* No Architecture Review required based on the existing SharePoint architecture and software.


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## Outreach and Communications

- ▶ **eCommunications from the Office of General Council**
  - ▶ Robin to send email to filers announcing new system and process - 1/5/09
  - ▶ Email from Robin (through SharePoint) initiating OGE Form 450 filing process and distributing instructions for sending out forms – 1/12/09
  - ▶ Email from Robin (through SharePoint) initiating SF 278 filing process and distributing instructions for sending out forms – 3/1/09
  - ▶ Reminders and Notification re-sends implemented as functionality in the system.
- ▶ **Agency-wide outreach activities will include:**
  - ▶ Posters
  - ▶ Fliers
  - ▶ Announce Channel Ad
  - ▶ Inside NSF Posting
  - ▶ SharePoint Announcement
- ▶ **Planned Demos to key target audiences:**
  - ▶ SharePoint User Group – 1/7/09
  - ▶ RRB – 1/8/09

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## Sample eFiling Outreach 2010

- Outreach to inform OGE Form 450 filers of the improved eFiling system included:
  - Emails to staff who were required to file
  - Fliers posted around NSF in January 2010 announcing the launch and detailing the dates of the training sessions
  - Announce Channel ads
  - Announcements posted on Inside NSF and on the SharePoint Page

**Financial Disclosure with e-File is back!**

NSF's Financial Disclosure e-filing solution provides you with a fast, secure, and easy way to submit your annual report online.

If you are required to file an Annual Confidential Financial Disclosure Report (OGE Form 450), you received email from the Office of General Council (OGC) with financial disclosure@nsc.gov with instructions on how to get started.

For more information about the reporting process, e-filing, and training sessions, visit [www.nsc.gov/ogc](http://www.nsc.gov/ogc).

If you have comments or questions, send an email to [financial\\_disclosure@nsc.gov](mailto:financial_disclosure@nsc.gov).

NSF Announce Channel

**Financial Disclosure Reporting with e-File is back!**

NSF's Financial Disclosure e-filing solution provides you with a fast, secure, and easy way to submit your annual SF 278 Public Financial Disclosure Report online! If you are required to file, you will receive an email from the Office of General Council (OGC) with financial\_disclosure@nsc.gov with instructions on how to get started.

The filing team will hold 6 training sessions where participants will receive instructions for filing a form of the electronic submission process, and have an opportunity to ask general questions about Financial Disclosure. If you attend a session, you will also receive credit for your Annual OIG training requirement.

Training sessions will be held in the following rooms:


• Tuesday, 4/20/10, 9:00 AM - 12:00 PM	• Tuesday, 4/20/10, 3:00 PM - 5:00 PM
• Tuesday, 4/27/10, 9:00 AM - 12:00 PM	• Tuesday, 4/27/10, 3:00 PM - 5:00 PM
• Tuesday, 5/4/10, 9:00 AM - 12:00 PM	• Tuesday, 5/4/10, 3:00 PM - 5:00 PM

For more information on NSF's Financial Disclosure Reporting requirements, see [www.nsc.gov/ogc](http://www.nsc.gov/ogc).

If you have comments or questions about Financial Disclosure Reporting, send an email to [financial\\_disclosure@nsc.gov](mailto:financial_disclosure@nsc.gov).

- Outreach to inform SF 278 filers of the improved eFiling system included:
  - Emails to staff who were required to file
  - Postcards delivered to mailboxes announcing eFiling and detailing the dates of training sessions
  - Announce Channel ads
  - Announcements posted on Inside NSF and on the SharePoint Page

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## Testing

**Testing:**


In December '08 and January '09, the SharePoint Team conducted testing of the new eFiling system and process to ensure usability and readiness. Testing reviewed the user interface, functional business process, 508 accessibility/browser capability, security and performance

**User Interface:**

- ▶ **End-to-end business process testing involving OGC staff and Conflicts Officials**
  - ▶ **OGE Form 450 testers were asked to review the following scenarios**
    1. Filing as a new entrant (and responding to a request for missing information).
    2. Filing as an annual filer (and requesting an extension).
  - ▶ **SF 278 testers were asked to review the following scenarios**
    1. Filing as a new entrant (and responding to a request for missing information).
    2. Filing as an annual filer (and requesting an extension).
    3. Filing as a terminated employee.

Form	Tester
<b>OGE Form 450</b> "Executive Branch Confidential Financial Disclosure Report"	Leslie Jensen, OGC Matt Powell, OGC Ann Noonan, OGC Sandra Scholar, OGC Robin Clay, OGC Faith Hixson, OGC Daniel Mc Enrue, DIS
<b>SF 278</b> "Executive Branch Public Financial Disclosure Report"	Michael Reischman, ENG/OAD Debbie Crawford, CISE/OAD Penelope Firth, BIO/DEB Karen Santoro, OGC Amy Northcutt, OGC Joanna Rom, BFA/OAD Robin Fritsch, OGC Faith Hixson, OGC


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## Testing Cont.

- Δ **Functional**
  - DIS Testing - James Graham, Abigail Marchetti, Stacie Boyd
- Δ **508 Accessibility/Browser Compatibility**
  - SharePoint product is compliant with the accessibility guidelines
  - SharePoint product is compatible with the following browsers: Internet Explorer, Mozilla Firefox, Safari
- Δ **Security**
  - Test scenarios executed to validate end-user access permissions
- Δ **Performance**
  - SharePoint approved enterprise system; supporting 1300 unique users with minimal utilization of hardware resources
- Δ **Peer reviews conducted on all custom development**
- Δ **All testing was conducted in the existing SharePoint environment; no new hardware or software changes**


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## Sample Testing Results

Feedback	Defect	Enhancement	Future Enhancement	Action
I don't know my username and password.		✓		Added text to email communication instructing users to enter LAN ID and password if using a web browser other than Microsoft IE.
I filled in my report and saved it, but now it's just a blank form.			✓	Added text to email communication instructing users to verify they have Adobe Acrobat Reader 7 or higher loaded on their system, and that they use it to complete their report.
I'm in BFA Front Office, but there's no option for Front Office under BFA.	✓			Added Front Office as an option under BFA
My LAN ID appeared in the Last Name, First Name field	✓			Corrected the logic for LAN ID to populate the LAN ID field
The reminder to file emails do not read like reminders.			✓	The SharePoint reminder email is standard across all sites.

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## Security

△ Authority to provide eFile service was granted by the U.S. Office of Government Ethics Memo dated May 16, 2007 DO-07-014 Guidance on Electronic Filing of Public and Confidential Financial Disclosure Reports

△ Security readiness:

- Security Review conducted with security team
- PIA conducted and approved – Two areas of improvement identified and remediate
  - Added Privacy Act text to screens
  - Prohibited the ability to email a version of the submission back to users
- Ethics Financial Disclosure eFile System Security Document Developed
- Enabled enhanced audit logging; conducting weekly review of logs
- Limited Admin access to SharePoint site


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## NSF's Comprehensive Approach to SharePoint Security

- △ SharePoint is an NSF managed service. SharePoint security includes:
  - Access to SharePoint sites and data
  - Administration of SharePoint services
  - Deployment in NSF's production environment

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## Secure Access to Sites and Data

- △ Access to SharePoint is limited to users with a valid and active NSF LAN account
- △ SharePoint can be accessed remotely using Access NSF and two-factor authentication
- △ SharePoint provides "fine-grained permissions". This means that permissions can be set for individual documents. Fine-grained permissions ensure that NSF staff can only view and update documents that belong to them.
  - For a SharePoint site such as eFile, each NSF staff member would only be able to view or update their own Form 450. Additional access is limited strictly to Ethics Officials in the Office of General Counsel and to 3 SharePoint administrators (for user support)
- △ Encryption (NIST-certified) of documents is available for sites that require extra security. For the eFile site, this means that all 450s are stored encrypted.
- △ NSF Security Officer signed off on eFiling site. Review included:
  - Server and Site Architecture
  - Document Life Cycle
  - Role-based Permissions Model
  - System Auditing

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## Administration Is Secured

- △ All SharePoint Administrators sign the SharePoint Administrator Rules of Behavior
  - Some SharePoint sites, such as eFile, have extra restrictions on administrators. Only 3 SharePoint administrators can access the eFile site in order to support users
  - Logging and auditing of SharePoint activity (accessing sites, viewing documents, etc.) by any user, including SharePoint administrators, is enabled by default. SharePoint logs cannot be changed by administrators
- △ All users of SharePoint are under the Federal IT Rules of Behavior
- △ The eFile SharePoint Site has a current Privacy Impact Assessment reviewed by NSF's Office of General Counsel


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## Secure Deployment As An Enterprise Service

- △ NSF SharePoint servers are located on the internal NSF network
  - They are protected by firewalls
  - Kept current with the latest security patches, and
  - Scanned routinely for any potential vulnerabilities
- △ NSF SharePoint servers are located in NSF's Data Center
  - Physical access is secured
  - Provides 24x7 equipment monitoring and user support
  - Redundant power systems
  - Environmental controls
- All data backups are encrypted

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## Risks

Risk	Assessment
Known Bugs and Open Issues	No Defects
Security Issues	<p>No Known Security Issues</p> <p>SharePoint is a fully supported enterprise application with security and maintenance support. Details of the security activities are listed in section 6.</p>
Team concerns	None at this time

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## Training and Customer Support


Δ Training

- Demos Conducted – to DIS, DAS, Senior Management and OGC Office
- Demos/Outreach Scheduled – SharePoint User Group, RRB, IT Specialists meeting
- ITHC Demo Conducted – with ITHC staff to provide overview of system functionality. Provided SharePoint and Financial Disclosure eFile FAQs and technical contact information.
- Tier I Support – provided by ITHC and is consistent with other SharePoint Tier I support
- Tier II Support – provided by ITBSS SharePoint team

Δ Customer Support and User Documentation


- Admin Quick Reference Guides will be provided to Business Owners (Ethics Team)
- Hands-on support to Business Owners during first 2 weeks, then ongoing
- System notifications and end-user instructions reviewed for usability by DAS and DIS Communications team.

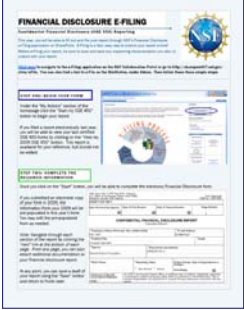
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## Sample eFiling Training 2010

- Training sessions were provided for OGE 450 and SF 278 filers
  - OGE 450 Training sessions
    - 340 people attended 5 sessions
    - Held from January to March
  - SF 278 training sessions
    - 67 people attended 5 sessions
    - Held from April to June
  
- Tips sheets were provided to both SF 278 filers and OGE 450 filers





- For future staff who need to eFile, Tips Sheets are available through a link on the eFiling homepage
  - In the email notification alerting users to the filing requirement, they are provided with the link to the eFile homepage
  - New Employee Orientation training being coordinated

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