eFiling

A Small Agency's Journey
NSF Initiative
Robin Clay

System Philosophy

- Instead of developing a system focused on allowing filers to submit electronic financial disclosure reports, we decided to develop a system that would serve as an Ethics Program Management Tool. Our vision was to not only allow filers to submit reports electronically, but to ensure that electronic reviewing of reports and management of the ethics program could be accomplished within the same system. We started working on this during the anthrax scares and heightened terror alerts so portability – the ability to do our jobs from anywhere – was foremost in our minds.
- We have been meeting weekly as a team for a few years and improving the system with each new roll-out. Calendar Year 2011 is the first 450 and 278 annual cycle for which we've had a prior report for each annual filer in the system to pre-populate the new reporting requirement. That process has gone very well so far. We have additional enhancements to the system scheduled for a January 2012 release date.

Key Information

1st Release Date: January 2009

2nd Release Date: January 2010

3rd Release-Upgrades: January 2011

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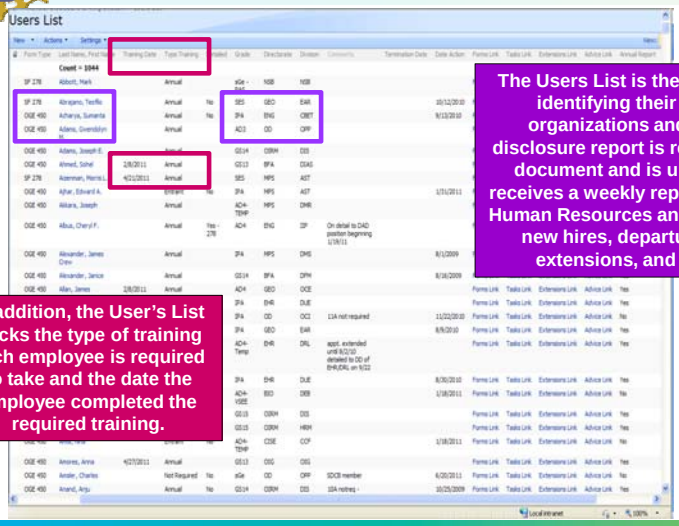
The Users List

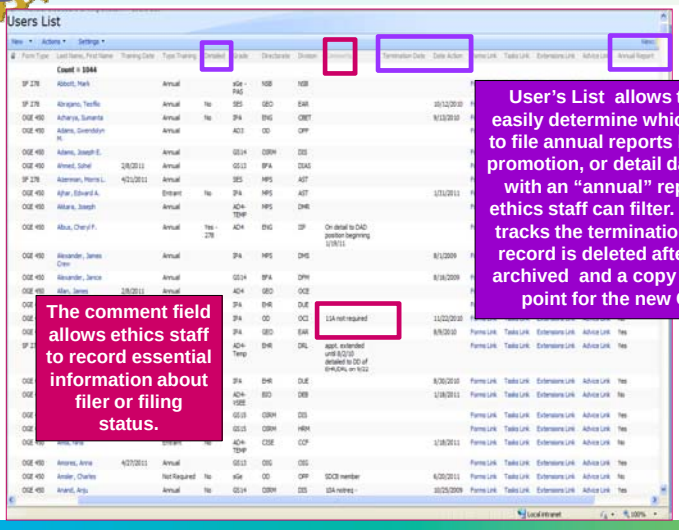


The Users List is the master list of filers, identifying their names, grades, organizations and which financial disclosure report is required. It is a living document and is updated when OGC receives a weekly report of new hires from Human Resources and a monthly report of new hires, departures, promotions, extensions, and reassignments.

In addition, the User's List tracks the type of training each employee is required to take and the date the employee completed the required training.

3

User's List

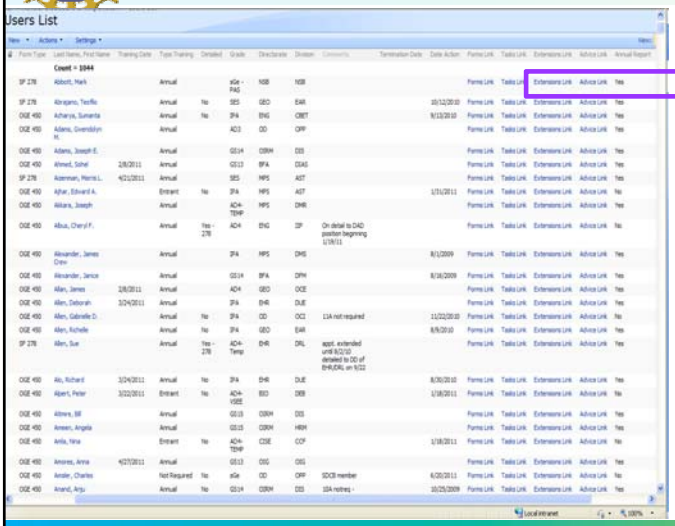


User's List allows the Ethics Team to easily determine which filers are required to file annual reports by tracking the EOD, promotion, or detail date in one field along with an "annual" report field on which ethics staff can filter. The User's List also tracks the termination date to ensure the record is deleted after the User's List is archived and a copy used as the starting point for the new CY report period.

The comment field allows ethics staff to record essential information about filer or filing status.

4

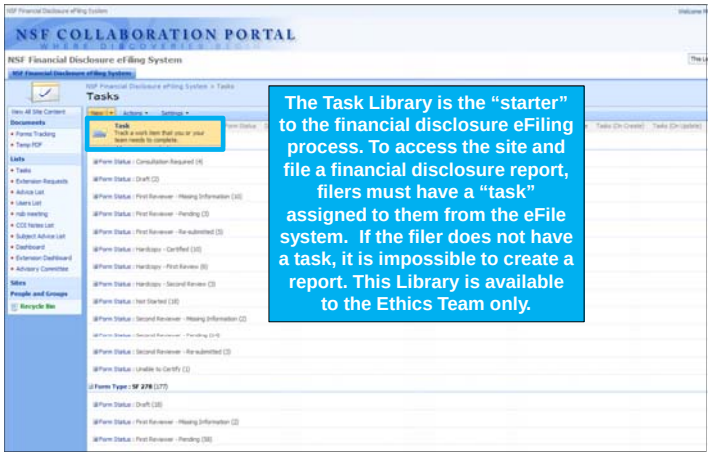
User's List – Navigation Bars



Navigation links to other libraries discussed later provide access to filer's current/prior reports, status of filer's task, access to filer's extension requests, and access to filer's advice folder

5

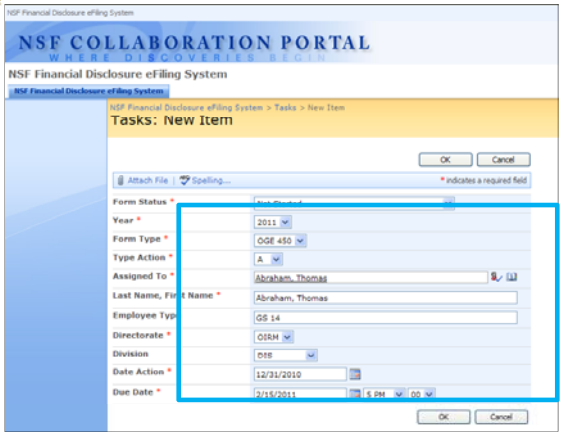
The Task Library



The Task Library is the "starter" to the financial disclosure eFiling process. To access the site and file a financial disclosure report, filers must have a "task" assigned to them from the eFile system. If the filer does not have a task, it is impossible to create a report. This Library is available to the Ethics Team only.

6

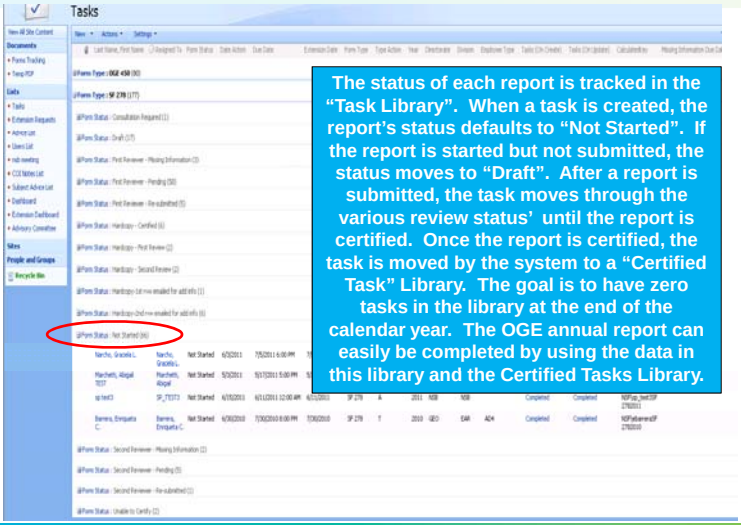
Sending Notification to File



The Ethics Team fills in information about the task and filer including Form Type, Due Date, Name, and Employee Type, then clicks OK to send a task notification email to the filer.

7

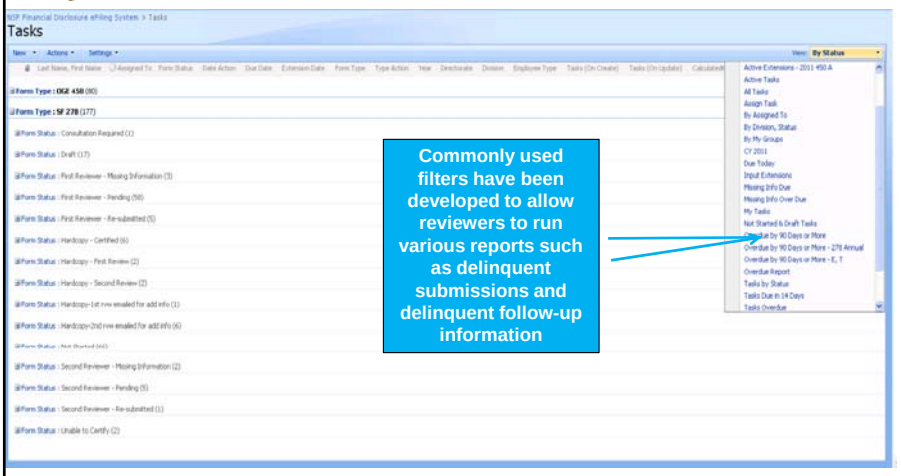
Task Library – Form Status



The status of each report is tracked in the "Task Library". When a task is created, the report's status defaults to "Not Started". If the report is started but not submitted, the status moves to "Draft". After a report is submitted, the task moves through the various review status' until the report is certified. Once the report is certified, the task is moved by the system to a "Certified Task" Library. The goal is to have zero tasks in the library at the end of the calendar year. The OGE annual report can easily be completed by using the data in this library and the Certified Tasks Library.

8

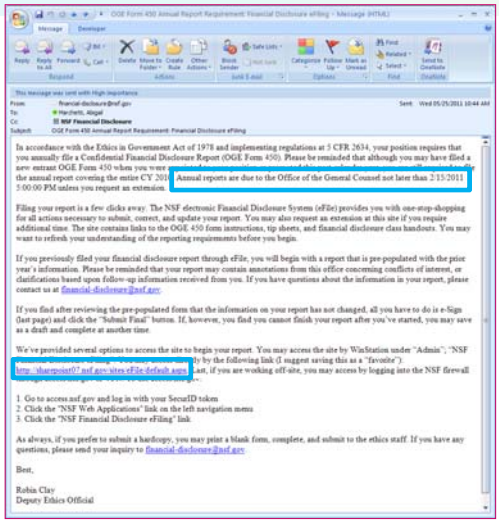
Task Library – Standardized Reports



Commonly used filters have been developed to allow reviewers to run various reports such as delinquent submissions and delinquent follow-up information

9

The Notification



After the task is input, the filer receives an email, which includes important information about the filing requirement, the filing Due Date and a link to the eFiling site.

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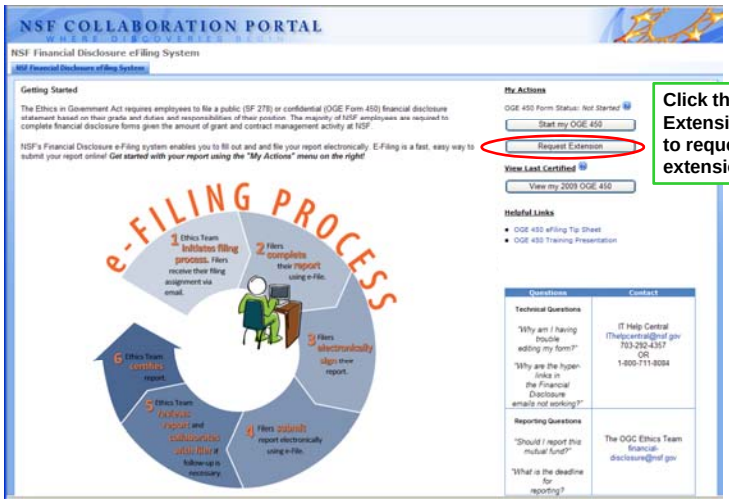
eFile HomePage

When filers who receive a task go to the eFile site, they can view their task status, start their report, request an extension, and view an electronic copy of their last submitted report. If the filer is a 278 filer, the buttons will read "SF 278". Under Helpful Links, the filer can review the tip sheet to learn to navigate the form or the disclosure training to learn to correctly fill out the form

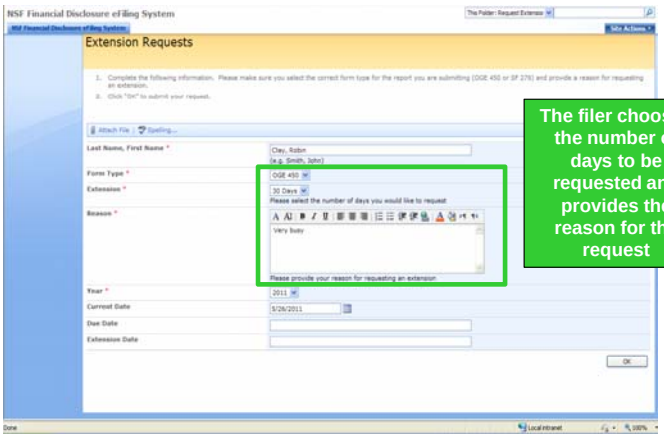
11

eFile HomePage – Requesting Extension



Click the "Request Extension" button to request an extension.

Extension Request



The filer chooses the number of days to be requested and provides the reason for the request

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Ethics Office Notification of Extension Request

From: NSF Financial Disclosure
Sent: Thursday, January 30, 2011 9:24 AM
To: NSF Financial Disclosure
Subject: Extension Approval Request: Financial Disclosure eFiling
Importance: High

Dear Ethics Staff:

I've received an extension request from NSF\rclay for 30 Days

My records indicate that the original due date is: 2/15/2011 5:00:00 PM
The current extension date (if applicable) is: 2/15/2011 5:00:00 PM
The reason this employee requires additional time is :
All of my financial records are in storage and I need to find the time to go through them and complete my report.

To approve this request please Click Here

Your friend,

eFile

The note to the ethics staff from eFile provides the due date of the report and the current extension date so that it is easy to determine whether the due date may be extended further (i.e. not over 90 days)

Reviewer clicks on this link to approve or deny the extension

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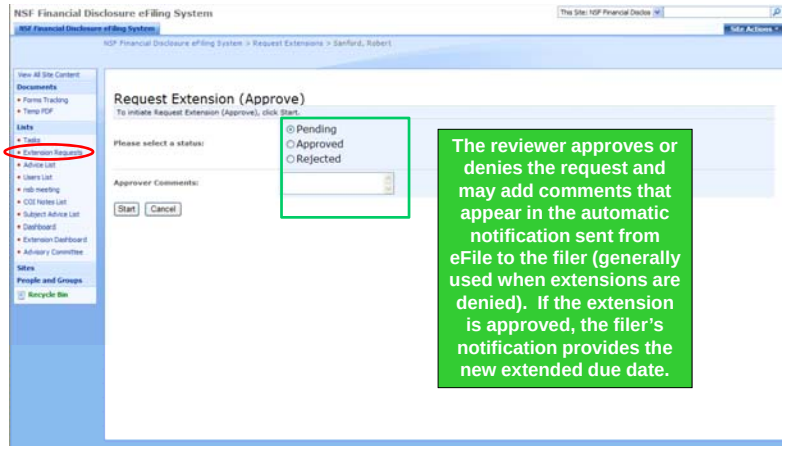
Extension Approval Screen

Requests, approvals, and denials are filed in Extension Library.



The reviewer approves or denies the request and may add comments that appear in the automatic notification sent from eFile to the filer (generally used when extensions are denied). If the extension is approved, the filer's notification provides the new extended due date.

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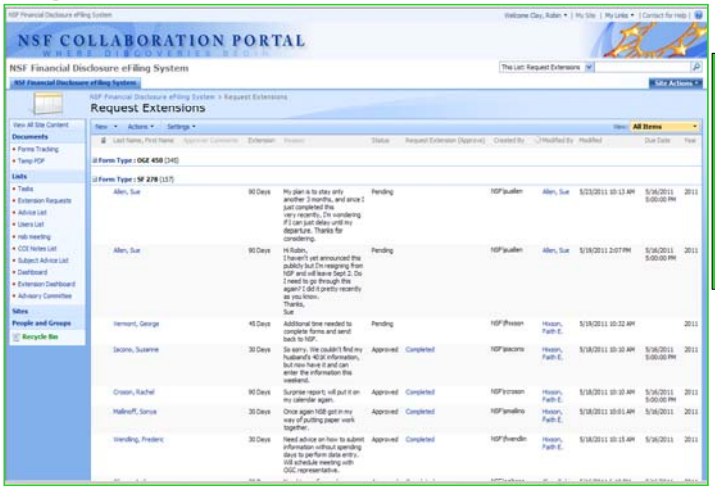
Extension Library



The extension library tracks the status of each extension request and provides an accurate count of the number of extensions submitted, number approved, and number denied for the OGE annual report

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eFile HomePage – Starting Report

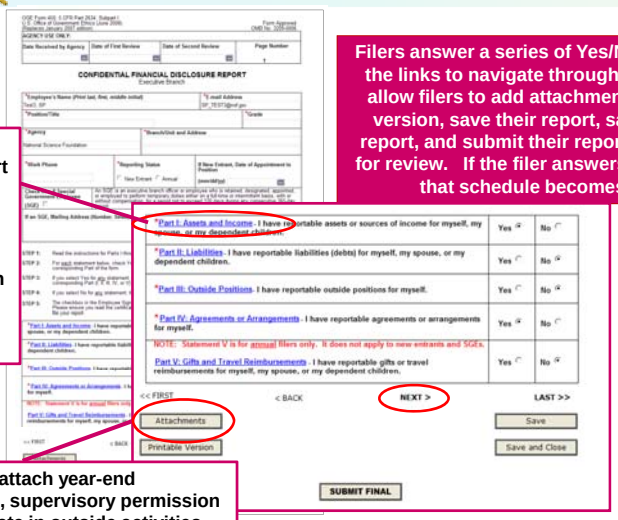
Click the "Start my OGE 450" button to get started.

Drafting Report

The eFile System automatically populates the form with the date the filer submits the report in the space provided.

Basic information including Name, E-mail Address, Title, Agency, Address, and Phone Number is pre-populated from the filer's corporate profile.

Drafting Report



Hyperlinks to each Part so a filer can review the part or input information as they answer questions.

Filers answer a series of Yes/No questions and use the links to navigate through the report. Buttons allow filers to add attachments, view a printable version, save their report, save and close their report, and submit their report to the Ethics Team for review. If the filer answers "No" to a question, that schedule becomes "read only".

Click "Next" to go to the next page of the report. Use of navigation link saves current progress of report.

Filers may attach year-end statements, supervisory permission to participate in outside activities, etc. Reviewers may also attach documents.

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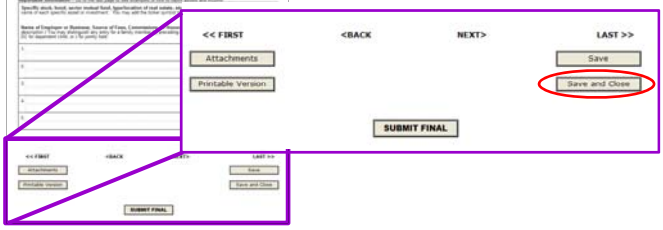
Drafting Report

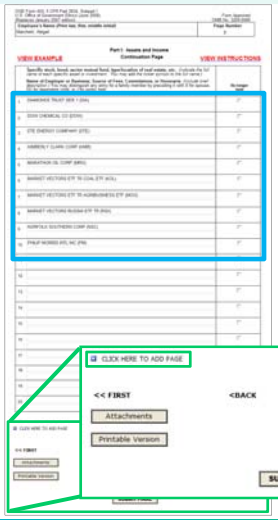
Links to specific examples and instructions are available from each section of the report

Navigation links and buttons are available on the bottom of all pages. The filer has the option of saving the report prior to completion and returning at a later time.



20

Drafting Report



If a filer previously submitted an electronic report, the information from the last submitted report is automatically populated into the current report. Filers simply need to update and add to the information.

Filers can use the "Click Here to Add Page Link" to insert more pages with additional lines to report their holdings, if necessary.

Click "Last" to jump to the signature page of the report.

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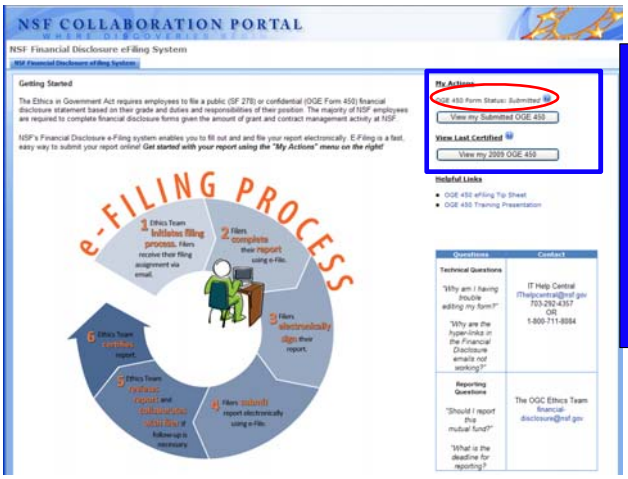
Signing and Submitting Report

Clicking the signature checkbox adds the filer's e-signature and date to the report

The filer clicks the "Submit Final" button to submit the report to the Ethics Team.

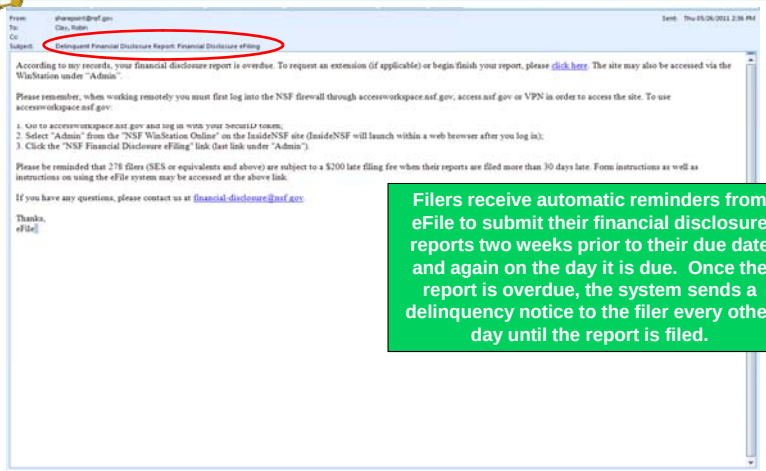
eFile Homepage – After Submission



After submitting:

- **Filer receives a confirmation email**
- **Task status is updated**
- **Report is available in read-only mode**
- **Option to request an extension is removed**

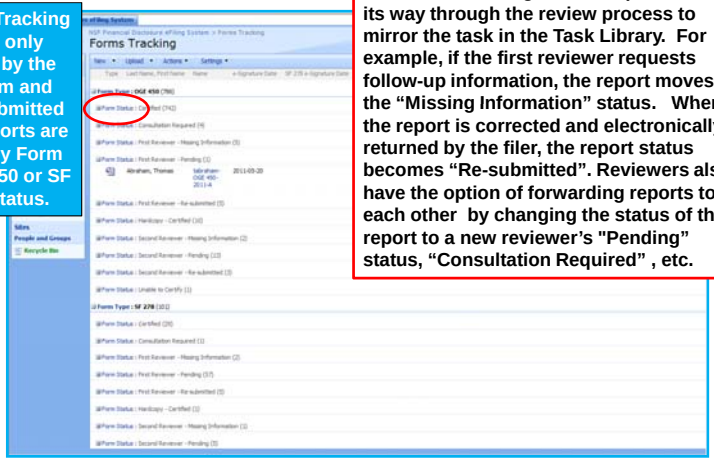
Reminders and Delinquency Notices



Filers receive automatic reminders from eFile to submit their financial disclosure reports two weeks prior to their due date and again on the day it is due. Once the report is overdue, the system sends a delinquency notice to the filer every other day until the report is filed.

Reviewing Reports

The Forms Tracking Library is only accessible by the Ethics Team and holds all submitted reports. Reports are organized by Form Type (OGE 450 or SF 278) and status.



Form status' change as the report makes its way through the review process to mirror the task in the Task Library. For example, if the first reviewer requests follow-up information, the report moves to the "Missing Information" status. When the report is corrected and electronically returned by the filer, the report status becomes "Re-submitted". Reviewers also have the option of forwarding reports to each other by changing the status of the report to a new reviewer's "Pending" status, "Consultation Required" , etc.

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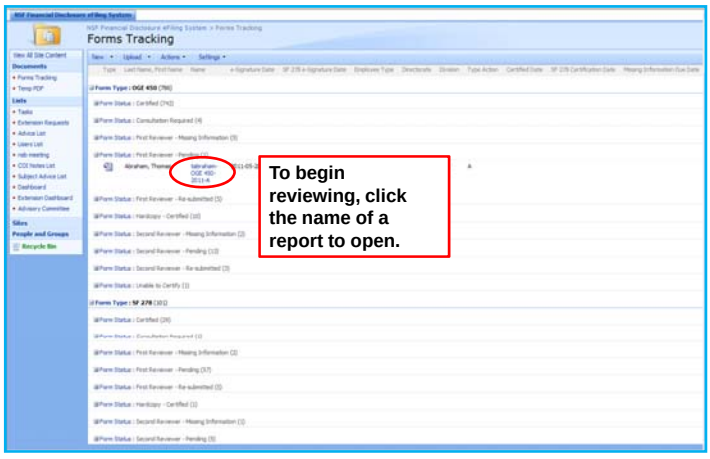
Reviewing Reports



To begin reviewing, click the name of a report to open.

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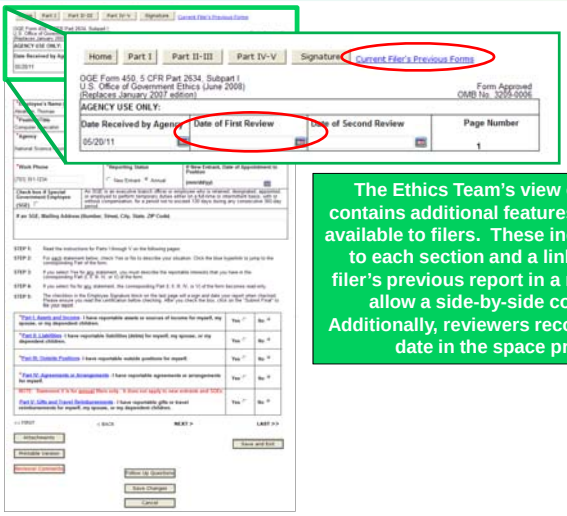
Reviewing Reports – Accessing Prior Report



The Ethics Team's view of the report contains additional features which are not available to filers. These include shortcuts to each section and a link to open the filer's previous report in a new window to allow a side-by-side comparison. Additionally, reviewers record their review date in the space provided.

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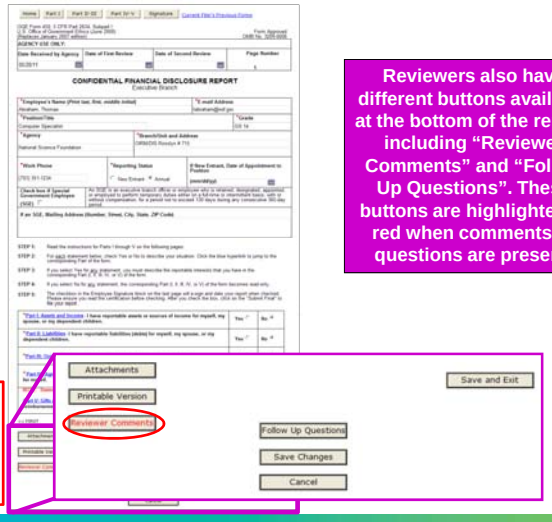
Reviewing Reports



Reviewers also have different buttons available at the bottom of the report, including "Reviewer Comments" and "Follow Up Questions". These buttons are highlighted in red when comments or questions are present.

Click the "Reviewer Comments" button to read any previous comments or to add new comments.

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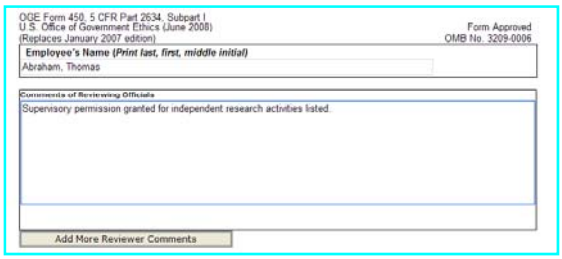
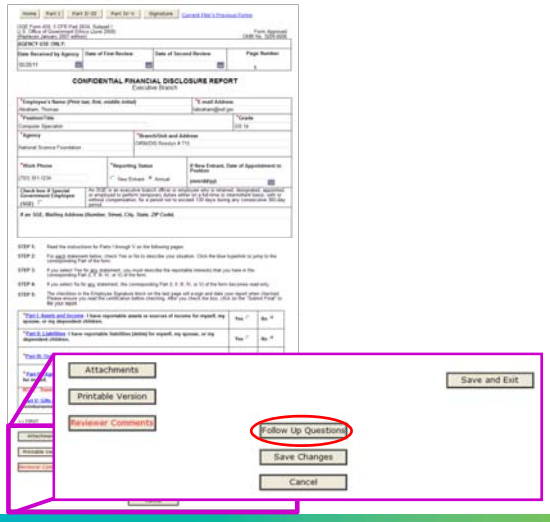
Reviewing Reports – Reviewer Comments



Reviewer comments are copied over from the filer's previous report and additional comments can be added. These comments are printed with the report.

29

Reviewing Reports – Requesting Corrections



Click the "Follow Up Questions" button to add questions for the filer to answer.

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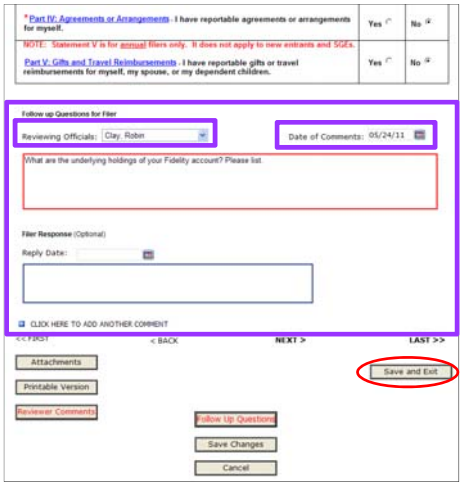
Reviewing Reports – Requesting Corrections

Reviewers choose their name and the date of their comments and enter questions for the filer within the "Follow Up Questions" area.



The follow-up screen stays open while reviewing each schedule so that the reviewer can move back and forth – adding additional questions with ease. After the review is complete, click the "Save and Exit" button to save the questions and return to the Forms Tracking Library.

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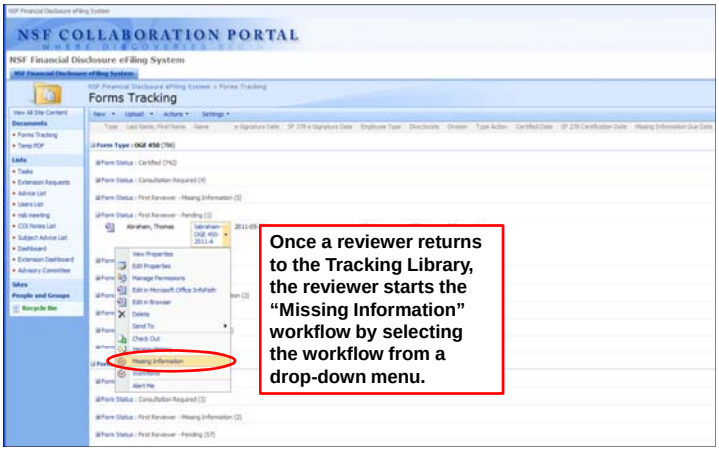
Missing Information Workflow



Once a reviewer returns to the Tracking Library, the reviewer starts the "Missing Information" workflow by selecting the workflow from a drop-down menu.

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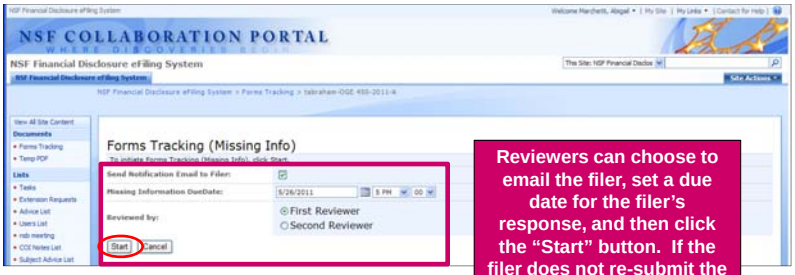
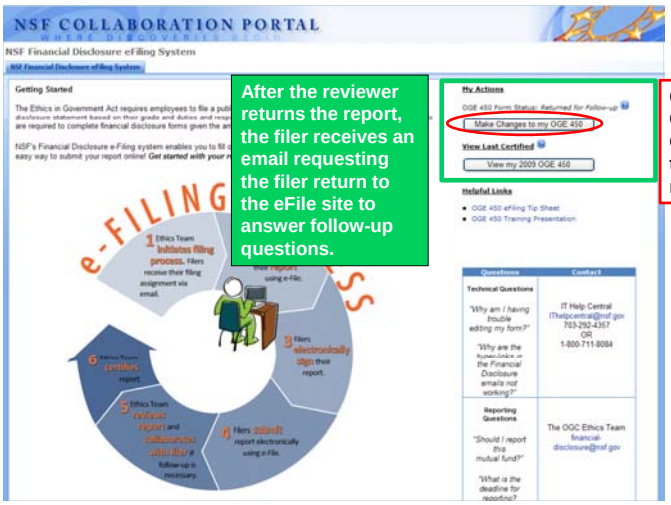
Missing Information Workflow



Reviewers can choose to email the filer, set a due date for the filer's response, and then click the "Start" button. If the filer does not re-submit the report with corrections by the due date, the system sends an overdue notice.



After the reviewer returns the report, the filer receives an email requesting the filer return to the eFile site to answer follow-up questions.

Click the "Make Changes to my OGE 450" button to open the returned report.

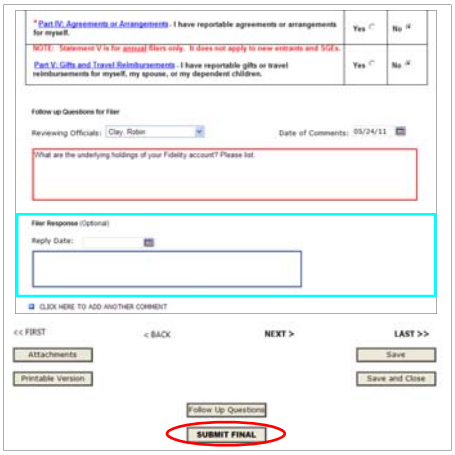
Correcting Report

Since the report was returned with questions, the "Follow Up Questions" button is now visible to the filer.

Click the "Follow Up Questions" button to see the reviewer's comments.

Correcting Report

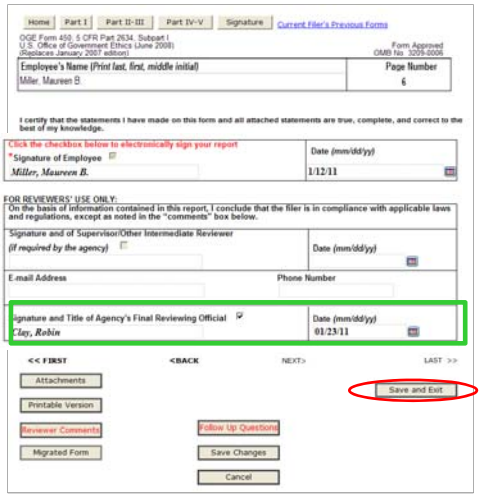
Filers can either write a response in the Filer Response area or update the report as requested.



Click the "Submit Final" button to send the updated report back to the Ethics Team.

Certifying Report

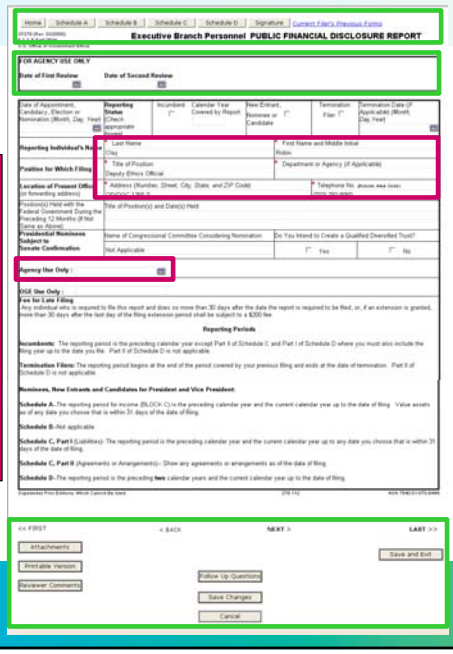
Clicking the signature checkbox adds the certifying official's e-signature and date to the report.



Click Save and Exit to return to Forms Tracking. The status of the report will automatically update to Certified.

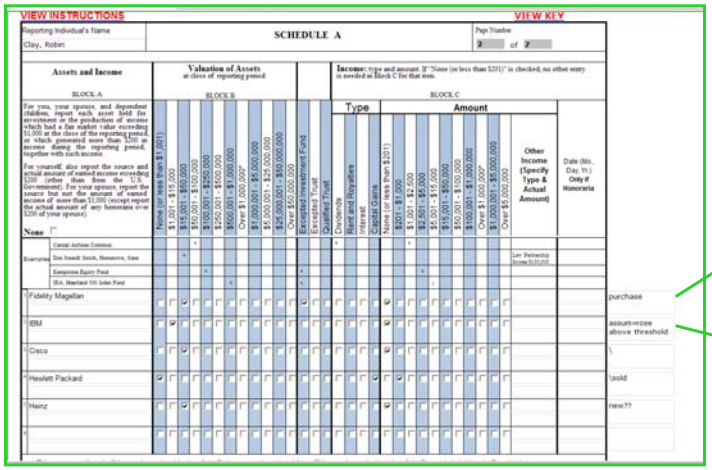
Additional 278 Review Features

Basic information - Name, Title, Agency, Address, and Phone Number is pre-populated from the filer's corporate profile. The date submitted is populated by the system



Much of the same features found on the OGE 450 are also on the SF 278. Reviewers input their review dates, and the same navigation buttons and functions are available

Additional 278 Review Features



Schedule A has a space to the side of each line item to add review notes such as those used by the reviewer when comparing prior and current reports. These review notes are not printed.

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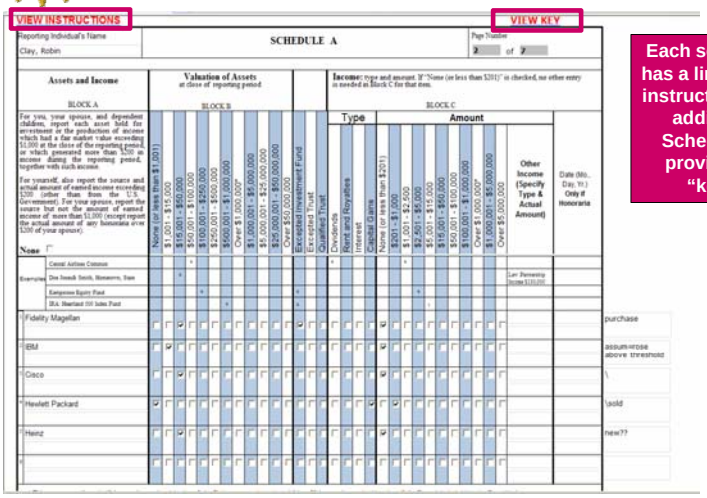
278 Additional Review Features



Each schedule has a link to the instructions. In addition, Schedule A provides a "key"

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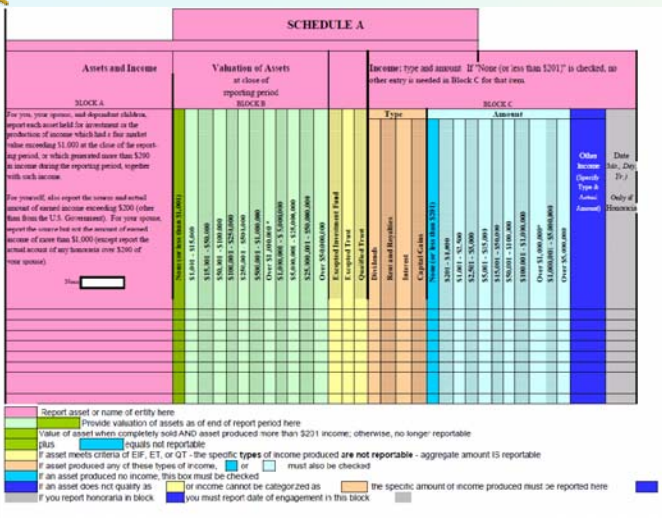
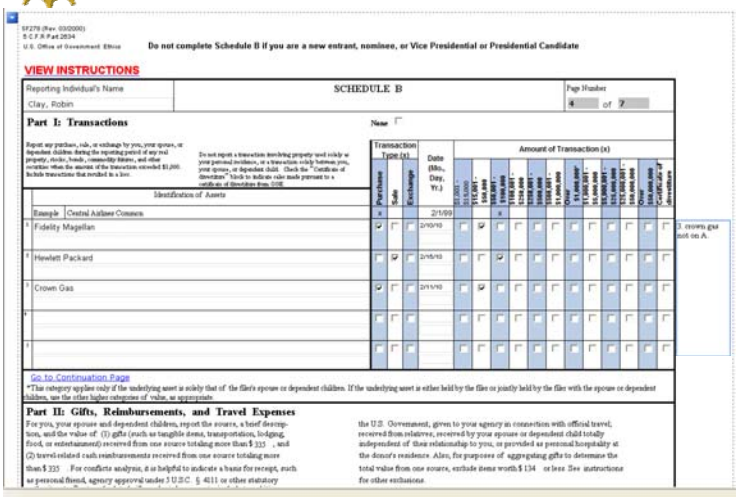
Schedule A Key

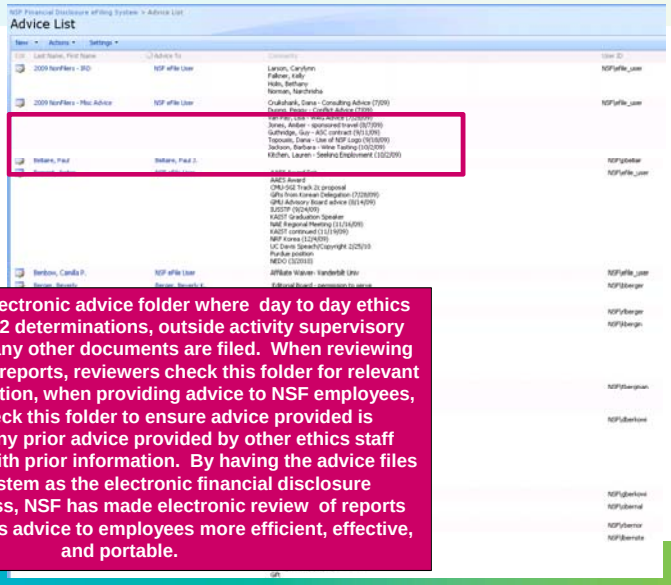


278 Additional Review Features



Schedule B also has a space to the side of the report for review notes. Again, these review notes are not printed.

Advice List



All filers have an electronic advice folder where day to day ethics advice, 208 and 502 determinations, outside activity supervisory permission, and many other documents are filed. When reviewing financial disclosure reports, reviewers check this folder for relevant documents. In addition, when providing advice to NSF employees, ethics staff check this folder to ensure advice provided is consistent with any prior advice provided by other ethics staff and/or consistent with prior information. By having the advice files in the same system as the electronic financial disclosure submission process, NSF has made electronic review of reports and providing ethics advice to employees more efficient, effective, and portable.

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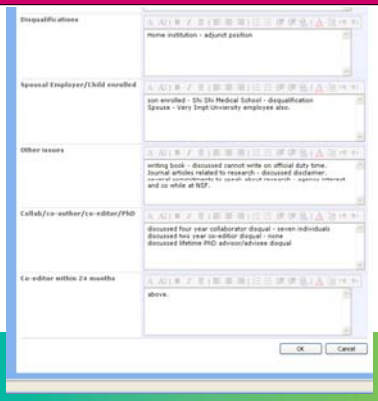
Conflict of Interest Profile

The Ethics Team provides pre-employment interviews for certain positions and Directorates prior to an employment decision being made. This is a separate library in the system and can be used in conjunction with the advice file when providing advice to employees or when reviewing an employee's financial disclosure report.



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