OBSERVATIONS
A Small Agency's eFile Odyssey

The eFile experience for a small agency may deviate, and in some cases, follow a more streamlined path than that of a larger, cabinet level agency. This will document a small agency's winding path to successful eFiling. If you compare NSF's journey to the Army's comprehensive roadmap, you will probably find many of the same steps, minus multiple review levels:

Got Vision? AKA – In the Beginning…

1. **It is all about trees** – The amount of natural resources we can save is tremendous.
2. **It is all about me –** I cannot get up at 3:45 every morning to go to work. Therefore, I need a system that allows seamless off site work.
3. **It is all about workload –** A system that automatically sends reminders, delinquency notices, provides online extensions, and allows online corrections will save a significant amount of administrative manpower. In addition, a reports progression through the review cycle that is automatically tracked by the system saves even more time and scarce manpower.
4. **It is all about them –** A system that allows the filer to start with a template of their last report each year, provides a copy of their last report for reference, allows them to file their report from home, request an extension online, communicate with the reviewer within the report, and correct the report within the system makes for a much happier and timelier filer.
5. **A more perfect union** – eFile allows us to better serve our clients by creating a more comprehensive ethics profile of each employee by providing access to financial disclosure reports, ethics advice and ethics training for each filer. Ethics officials can access the system and provide advice from anywhere, anytime.

Got Plan? Cheerleading IS a Sport…

1. **Robin, Robin, You're the Man, If You Can't Do It…** - If you are the one with the vision, you probably need to be the one in charge of the plan. In a small agency, we are fortunate in that decisionmaking is more streamlined – I say "please" – you say "why" (a scientist joke…) and eventually we work towards our goal.
2. **The Powers that Be –** Go to the experts in your agency for advice regarding options– especially if your agency's ethics program has absolutely no budget and there is no push or "buy in" for eFile. I went to a manager in the Division of Information Services who was coincidentally an OGE Form 450 filer and who personally wanted to electronically file her report. She thought it a worthwhile project and was able to assign an internal team.

3. **Make Sure YOU Understand All of the Requirements for eFile (before you set up your first requirements meeting)** – What are your internal requirements? What are OGE's requirements? As an example of NOT understanding all of the requirements, our first eFile project director interpreted OGE's requirements for e-signature as allowing for a "checkbox" since the checkbox met the requirements of the E-Sign law and other requirements as stipulated in the DAEOgram. Not so – there has to be a physical signature…
4. **Some Things Are NOT Worth Repeating** – Figuring out what you do not want is just as important as what you do want. DO look at other systems before you jump feet first. Learn from our mistakes – functions we did not include in our systems, the things we did a poor job of incorporating into our systems, the things that could use a bit of tweaking. Take the best ideas and use those to build a better system.
5. **Rome was not Built in a Day** – Do not try to do too many things at once. Some of the systems I've seen started big, but missed a lot of detail because the initial scope of the system was too large. NSF's team has been meeting weekly for four years – making changes, improving the system and its performance, adding additional features each year.
6. **Use Your Best Courting Skills** – Filer buy-in should be a forethought, not an afterthought. Start romancing your filers early – know what makes them happy. If you work for a tree-hugger agency, emphasize resource savings – my scientists wear Birkenstocks and wool socks – **with everything**. If time-management is an issue, emphasize that issue. I pretty much threw in the kitchen sink to get my people on board. We have about 99% of our filers who are able to file electronically, doing so.

Got Whip?

1. **YOU GET WHAT YOU ASK FOR** – Please remember that programmers are not ethics officials and have never read 5 CFR 2634, never filed a financial disclosure report, never reviewed a financial disclosure report, and are going to give you exactly what you ask for – no more, and sometimes a lot less due to ignorance and miscommunications. DO NOT provide your programmers with a list of requirements in one meeting and go back to the daily grind. Your final product will NOT turn out to be anything like you've envisioned. You have to meet with them, meet with them, meet with them; test it, test it, test it. REPEAT AFTER ME – meet with them, test; meet with them, test… AND make them re-do it your way WHEN it is incorrect.
2. **Whose the Boss?** – The subtitle to this is "You get what you ask for, Part II". Requirements are an ongoing process. Do not let the programmer tell you – too bad, so sad – that you did not think of it earlier. Many requirements do not become "known" until you are pretty far along in the process. Therefore, meet, test, meet, test, meet, test… and insist on necessary changes.

3. **Time IS Your Friend –** When you sign off on the requirements document and the timeline, think of it as your guide. If you are dogmatic and do not allow for flexibility, you may miss out on some necessary and crucial features.
4. **Have Fun –** Who cares if you use the system to amuse yourself by writing love letters and other letters of adoration from your main man eFile Dude. No one sees those letters but you – and it is nice to have a complimentary note every now and then – at least someone likes the ethics official…

Got Beta?

1. **No One Knows the Trouble I've Seen –** Hello, my name is Robin, and I'm not perfect. If not for the Beta Testing that we did with our Conflicts Officials prior to deployment, our first roll-out would have been a disaster. As much as I had already worked with the system, the flaws with the process did not rear their ugly heads until we sent out tasks for our officials to file reports. I cannot stress enough the importance of Beta Testing prior to actual deployment of the system. It will save your reputation – and maybe you won't have to admit publicly that you are not perfect…
2. **My Friend the Geek -** After all of the issues discovered during Beta are fixed, it is time for the IT folks to perform all of the final internal tests encompassing functionality, 508 accessibility/compatibility, security, and performance.

Got Clearance?

1. **It's All Fun and Games Until Someone Needs the Paperwork –** You must develop for approval a Privacy Impact Assessment (PIA) for eFile. The PIA ensures that electronic collections of information on individuals are evaluated for privacy risks, conforms to Privacy Act life cycle management requirements, and ensures that privacy protection measures are in place. You will need to consult with your Privacy Act Officer.
2. **Gottta Clean Up Your Act –** Your eFile system must go through a security review that requires approval from your Chief Information Officer prior to deployment. The PIA and development of a security plan is part of this review.
3. **On Strike – REALLY? –** After serving for 15 years in an agency where labor union issues and ethics issues very rarely coincided because most positions were non-collective bargaining, I did not understand the IMPORTANCE of clearing this "change in procedure", even though not mandatory, through our Union. Two Unfair Labor Practice filings later, we are all on the same page. As a result, NSF now has consultation with the Union as a standard step when converting a paper process to electronic format.

Let's Give Them Something to Talk About

1. **I Say Tomahto… -** As important as developing your system is to your program, developing a communication plan is just as or even more important. Having an electronic system in place may not provide the benefits you envision if only 25% of your filers use it. You have to make them want to use it.
2. **Demo It –** Prior to rollout, schedule demos to as many groups in the agency as possible. We conducted demos with the Division of Information Systems, Division of Administrative Systems, Senior Management, Office of the General Counsel, the SharePoint User's Group, the Business Applications Requirements Review Board, IT Specialist's Group, and IT Help Central – which provides technical support for the system.
3. **Outreach –** Prior to rollout, reach your target audience through a variety of mediums. We sent personal emails extolling the benefits of electronic filing, personal emails letting filers know what to expect and when to expect it, hung posters and fliers, and sent postcards to 278 filers. We also made announcements on electronic medium such as our Announce Channel, Inside NSF website, and SharePoint website.

I Want to Hold Your Hand…

1. **When You Turn 18, You Are On Your Own! –** What can I say – I have teenagers… Unlike them, there is probably a light at the end of the eFile tunnel – but it is not with rollout. If you want eFile to be successful, you should plan to spend a lot of time handholding – meaning deskside assists as well as training on the system.
2. **Overachieving - Killing Three Birds -** The eFile Project Director and I offered many training sessions for the eFile system the first and second years. We combined the system training with a course on the financial disclosure requirements of the specific form we were targeting AND ethics training. Because our filers were provided credit for ethics training if they attended, they were motivated. Both years, approximately one third of our filers attended our training. For example, NSF has approximately 900 OGE Form 450 Filers and 200 OGE Form 278 Filers. In 2010, 340 OGE Form 450 Filers attended the five sessions held between January and March and 67 OGE Form 278 Filers attended the five sessions held from April to June. The Director of NSF signed up for my first 278 session – he did not even draft his own report – I did.
3. **No Pressure – REALLY –** Consider an across-the board extension. The first year of eFile – because it was a new system and I wanted as many filers as possible to be able to train – we provided an automatic 30 day extension to all filers. This helped with easing into the 450 requirement especially.

Rollin, Rollin, Rollin Down the River…

1. **Slow Train –** Just as you Beta tested the system prior to finalization, you should Beta Test your roll out. Each year we've made changes to eFile – fixes, improvements. We roll out the system the first week of January to 450 filers in our Division of Information Services for testing purposes. These are our IT folks in the agency. They have a one to two week head start to file their annual 450s and let us know of any issues. If all goes well, we roll out the annual requirement to the rest of the Foundation.
2. **Distance Just Might Make the Heart Grow Fonder –** Our team has been together for several years with some minor adjustments. We still meet weekly to discuss issues or plan for the future. I have a rule that if we work on the weekend, we are supposed to use our codenames. Mine used to be "the Sparrow". However, Faith and I have most recently been known as "Pinky and the Brain"…