

Roadmap & Planning Workbook: Electronically File (eFile) & Manage Financial Disclosure Reports (FDRs)

https://www.fdm.army.mil/PM_Reference_Docs/efilingRoadmap2.doc

Editor's Note: At OGE's request, I updated this 2011 edition for sharing in the 18th National OGE Conference materials. I shared it with eFiling agencies OGE identified for comment and completion of an eFiling Information appendix to share information with other agencies interested in migrating to eFiling.

Our roadmap includes what has worked in other agencies to create an actionable model for successful transformation to an eFiling program.

Please send comments/suggestions to geo-hancock@us.army.mil.

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Roadmap & Planning Workbook: Electronically File (eFile) & Manage Financial Disclosure Reports (FDRs)

*Software should help its users do their jobs better, easier, and/or faster.
Note: this does not mean, however, it will help its EVERY user EQUALLY do the job
better, easier, and/or faster! Some users will benefit more than others.*

Introduction

Why do you want your agency to electronically file (eFile) and manage Financial Disclosure Reports (FDRs)? No doubt you expect it will help you do your job better, easier, and faster. That is a good reason, but is it enough for your agency decision maker to commit agency money and people to an eFiling initiative? You probably need to show advantages (e.g., faster FDR processing - time savings to Filers, error elimination, other tangible, intangible benefits) to persuade your agency leadership to support and invest in eFiling initiative.

Most everything worthwhile requires careful thought and planning. Implementing eFiling is no different. It is challenging. It is a strategic issue requiring time, money, and coordination. Your agency's needs must be determined, its current FDR processes analyzed, and options evaluated.

Whether you buy and adapt a commercial off-the-shelf solution, have another agency operate a "turn-key" solution, or build a custom system in-house, you (or someone in your agency) must take certain steps to ensure a clear eFiling vision, design meets specific agency needs, progress happens on track and within budget, and proper user support is readily available.

This Workbook should help you along the way and save you some organizing time. Members of the Interagency Ethics Council eFiling Work Group developed it initially as a guide for U.S. ethics officials seeking to implement eFiling. It incorporates the experiences of certain agencies currently eFiling FDRs as well as thoughts of some work group members at agencies investigating eFiling.

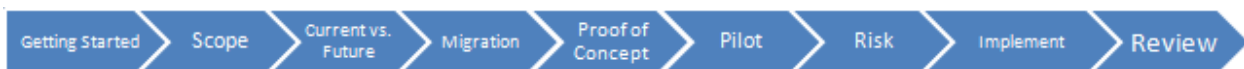
It is organized into several sections. Each represents a major milestone toward successfully implementing an eFiling initiative:

- **Executive Summary:** An overview of the case for eFiling FDRs, the goals of the plan, and how the plan will be executed. When most of the workbook is complete create an Executive Summary.
- **Getting Started:** Some preliminary questions to answer as your eFiling initiative takes shape.
- **Scope:** The overall scope clearly defines the boundaries of what is included in your eFiling initiative. For example, the case for eFiling, along with the timing of the deployment, a budget, how you will gain users' cooperation and engender

enthusiasm, the service level you plan to provide, as well as the results you plan to achieve.

- **Current versus Planned Environment:** An analysis and inventory of the current FDR process and environment as well as the future planned FDR process and environment, including hardware, software, and network infrastructure.
- **Migration Plan:** A detailed plan for migrating from the current environment to the planned environment, including migrating current paper FDRs.
- **Proof of Concept:** Describes the testing of all physical aspects of the eFiling solution.
- **Pilot:** Outlines implementing the entire plan on a representative pilot group of agency users.
- **Risk Assessment:** Documents risks for a successful implementation and how can they be mitigated; is based on the results of the Proof of Concept, the Pilot, and other planning factors such as the budget.
- **Implementation Plan:** A detailed rollout schedule and plan for actual deployment to all agency users.
- **Post Implementation Review:** A review, complete with any changes necessary to move forward, lessons learned for the next deployment, and considerations for application development and use.
- **Maintaining the Solution:** once your eFiling solution is up and running you need to plan for operating it, receiving user feedback, and improving it.

At the start of each section of the workbook is a progress graphic to give you an idea of your progress in completing the entire plan. Use this to “think through” your initiative.



Finally, adapting this workbook to your eFiling initiative should help you present it to your agency Information Technology Office (ITO) staff. Implementing an eFiling initiative requires close coordination with and support of select agency ITO staff.

Executive Summary

The goal of your executive summary is to quickly inform its readers and agency decision makers of the most pertinent points of the eFiling initiative.

Summarize these sections in the executive summary:

- Scope
- Current versus Planned Environment
- Migration Plan
- Proof of Concept
- Pilot
- Risk Assessment
- Implementation
- Post Implementation Review

The Executive Summary persuades and interests agency/ethics leadership that the initiative has merits and is achievable.

Note: Traditionally, the executive summary appears near the front of a plan, however, you probably will not have its content until your plan is almost complete.

Getting Started

Getting Started

An important first step to eFiling (or any initiative) is to have a common understanding of what it is and what it will achieve in your agency and for its users. Equally important is connecting this to the agency's strategic plan to gain leadership support.

Begin by answering a few questions (at least partially) for your agency.

What is “eFiling” to my agency ethics leadership (or me)?

Initially, think of eFiling as “a purposefully designed system that brings data, computers, procedures, and people together to process and manage FDRs.” Beyond that, what do you want it to be and do in your agency?

- Is it sending a scanned FDR by email? That really is not eFiling – see OGE DAEOgram DO-07-014, *Guidance on Electronic Filing of Public and Confidential Financial Disclosure Reports*, http://www.usoge.gov/pages/daeograms/dgr_files/2007/do07014.html.
- Is it applying a digital signature to a fillable form that is securely stored on my agency's network?
- Is it a secure, web-based software program that allows agency users world-wide access where Filers login via an Internet browser and enter their financial data? Reviewers login to review their various assigned Filers' reports. Certifying authorities then finally review and approve the eFiled report. The secure online system preserves the data for the requisite record retention period and provides access to authorized organizational users. The system compares and highlights differences between a Filer's subsequent reports. . .

The answer will guide your effort and help you determine your agency eFiling vision and preliminary needs.

For example, if eFiling is merely adding a digital signature capability to a fillable form you may only want software that provides that. Your eFiling implementation could be as easy as contacting your agency's Information Technology (IT) Office and explaining your need (e.g., add digital signature capability to an eForm). That office could “budget” and incorporate your requirement in its operating program, and “buy” you a digital signature solution. Next, is deploying that solution to users and training the users.

What is my organization vision of eFiling? What is the “end state” when my agency is eFiling?

You may find it helpful to draft a preliminary eFiling Vision. The vision is for the agency leadership and eventual eFiling users so they understand the goal, end state, or desired results of the eFiling initiative. For example:

Transform our existing paper-based OGE 278 and OGE 450 reporting process to an easy to use, web-based application that is efficient, accurate, and secure, eliminating most common mistakes while saving its users report preparation or review time.

or

Implement a secure, web-based application that automates the financial disclosure report preparation (OGE 278 & OGE 450) and electronic filing process by:

- Guiding a filer through questions about reportable financial information (*TurboTax-like*)
- Validating a filer's data
- Flagging missing and incorrect information
- Displaying a report comparison view
- Starting each report with previous report information
- Reducing common errors
- Increasing data accuracy

Vision is a realistic description of the eventual eFiling system. Vision statements are normally both aspirational and inspirational. When it is not practical, realistic, and achievable, vision is only hallucination. Some visions are inherently flawed because they suggest unattainable results. For example, a vision statement that a system will meet *all* current and future needs of the user community, suggests that programs can be designed to satisfy unstated, even unknown requirements. Limit your vision statement to realistic expectations.

You may prefer a narrative of how select agency personnel will use the eFiling system—a *concept of operations*—to articulate the vision of eFiling. For example:

Filers use a secure, web-based system to prepare, review, and submit a required financial disclosure report. **Reviewers** – supervisors and ethics counselors – review the report online before the **Designated Agency Ethics Official, or Designee**, approves the report online.

Why do I want eFiling? Why does my organization want eFiling? What benefits will my agency get from eFiling?

A main premise of an eFiling initiative is that paper-based FDR preparation and review, processing and managing, is slow, inadequate, and error-prone. These are good reasons to move to an eFiling approach. Are there others you are considering?

In one case a senior ethics official said “Turbo Tax the FDR process in a web-based program. Find an easier way to process and manage FDRs.” Right away one reason for eFiling was clear.

Some eFiling benefits include:

Efficient: a smart form wizard design guides a Filer through the form filling and review process quickly and effectively. Paperless workflow eliminates the physical hand-offs between filers and reviewers.

Accurate: the system incorporates Office of Government Ethics (OGE) certified business rules ensuring accurate and consistent financial disclosure reports ***the first time***.

Secure: the system limits access to a Filer's information - only a filer and his/her review chain can see the report. All personal information is protected through the use of security features such as SSL 128-bit encryption and user authentication.

What are my organizational eFiling needs and wants?

Start with general features. For example:

- Secure, web-based access world-wide
- Simple to use, leveraging IT skills users already have (e.g., familiarity with eFiling income tax software, MS Word, Internet Explorer (for attachments))
- Minimal user training requirement – Filer's don't have/want to take the time to "learn" a software program
- Report information readily available online (w/o searching file cabinet)
- Improved FDR consistency, accuracy, & timeliness

As you refine the needs and wants, distinguish "*Must Have*" from "*Nice to Do*" (in case your agency cannot afford the "nice to do" at first). For example, you may decide that importing a user's personnel information from an agency personnel system is more of a nice to do than a must have initially. Perhaps you want to add that later after coordination with your agency's personnel system manager.

Scan Appendix B, a sample list of eFiling requirements. For example:

- Pre-population – Information is captured once and reused in later reports during subsequent filing seasons.
- Automatic "flagging" of incomplete and inconsistent report information.
- E-mail alerts that allow for the management of filer and reviewer activity.
- Audit trail captures all report activities.
- The report can only be viewed by the filer and the filer's review chain.

What is realistically achievable eFiling?

Time for a reality or sanity check. You are unlikely to get funding for everything you want the first time around so temper your eFiling appetite to the most important features that you "*must have*."

Who will help with the eFiling initiative?

Successful eFiling takes a team – ethics personnel and agency IT personnel initially working toward the same vision. Later, the Filer and Reviewers need to cooperate and use the system. It is never too early to identify key personnel to recruit to your eFiling initiative team.

Who will decide on eFiling in your agency?

Most likely your agency DAEO will have to champion the eFiling initiative to your agency leadership – agency head and CIO. The information you compile using this workbook should go a long way toward success. Also keep in mind the “What’s in it for me?” (W3IFM) that makes the initiative personal to key decision makers. Prepare to tell them the personal benefits they get when they use the eFiling solution to complete an often dreaded, unpleasant, but required task. In at least one case saving a Filer time and making the task easier was persuasive.

What’s in it for me (W3IFM)?

- ***Better report accuracy***
- ***Easier filing/management***
- ***Faster reporting/reviewing***

How will your agency eFile?

While it is too early to know how your agency will implement an eFiling initiative you should gather information on the “how” as early as possible. In this regard, consider other agencies that adopted eFiling. See Appendix A for a summary.

With the answers in mind there are a few other “organizing” tasks to move your eFiling initiative forward.

Establish an Agency Ethics eFiling Decision Making Structure

Doing so is an important start on the road to successful eFiling. It will give the eFiling initiative a foundation in the agency. Successful eFiling implementation depends on senior ethics official leadership, user involvement, strong management, and a sound structure for planning and decision making.

Success also requires buy-in on several levels.

- Your agency leadership and DAEO must support the initiative from a financial, personnel, and business perspective.
- Users must be willing to use the technology once it is in place.
- Technologists must understand the technical environment and successfully support it.

WHAT A decision making structure for your eFiling implementation that:

- provides leadership and accountability,
- relates the agency strategic plan to the eFiling initiative,
- analyzes technical environments, policies and solutions, and
- effectively manages the eFiling initiative.

WHO Agency Ethics leadership (DAEO), users (e.g., Ethics Office staff, Filers, Report Reviewers), a dedicated eFiling Initiative Manager, and

ITO staff.

WHY To ensure a well-defined decision making structure with clear responsibilities and authority, that the structure is officially sanctioned and that it involves users to address problems.

WHEN The sooner the better.

Representatives of the Decision Making Structure will:

- Develop a united vision and determine the scope and focus of the initiative.
- Identify legal, policy, administrative, funding, technical, and other obstacles to the initiative.
- Define and sanction initiative objectives, tasks, and timetables.
- Garner support from other relevant decision makers (Agency CIO).
- Monitor planning, implementation, and management of the initiative.
- Define the operational requirements for the initiative.
- Oversee the acquisition.
- Resolve obstacles to implementation.
- Review system performance.
- Make recommendations concerning systems improvements, enhancements, and next steps.

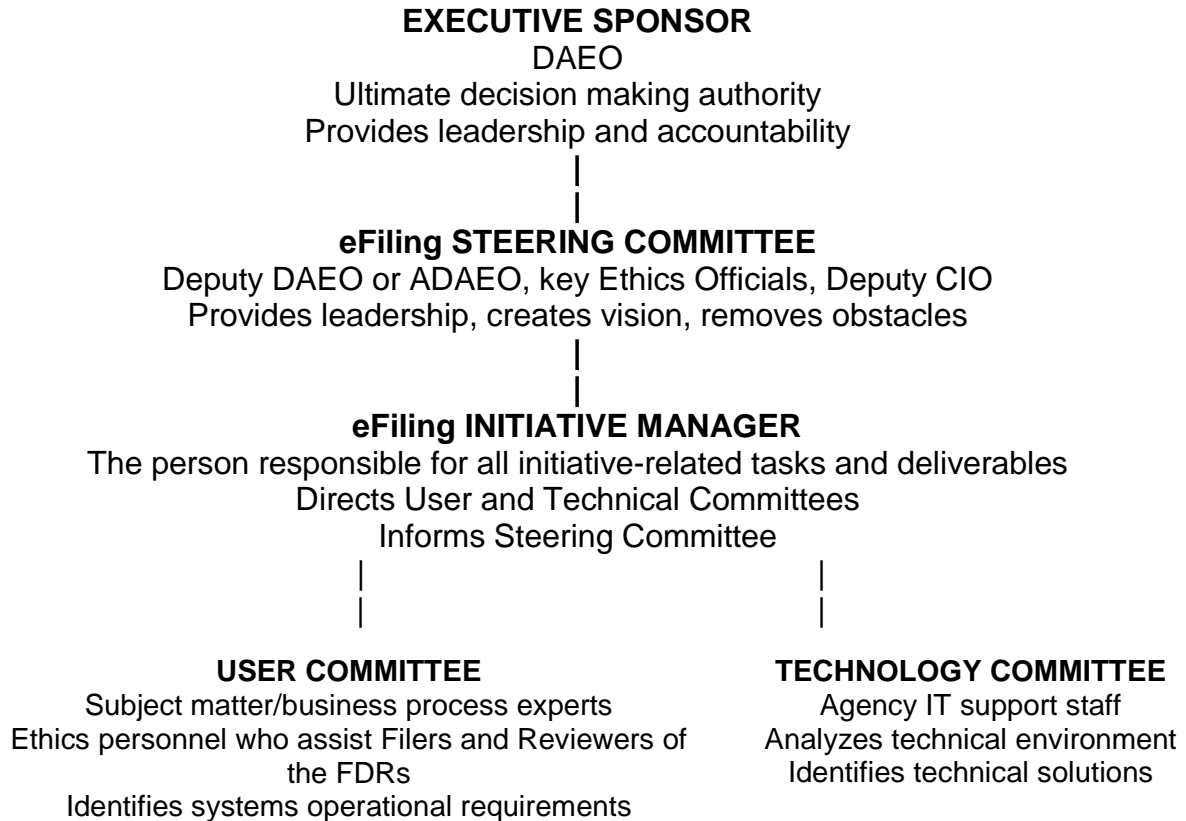
Step 1 **Identify an Agency “Executive Sponsor:”** the one with ultimate accountability for the eFiling initiative with authority to sanction the eFiling initiative and make it an agency priority. This person is the champion, spokesperson and leader for the eFiling effort. Most likely this is your agency DAEO.

Step 2 **Identify Agency Stakeholders:** those agency people who will be affected by the eFiling initiative. Consider the intended users and those who have an indirect role in achieving successful eFiling. It is critical to:

- identify the stakeholders,
- determine their needs and expectations, and then,
- manage and influence those expectations to ensure success.

Step 3 **Establish the eFiling Decision Making Structure** so those involved in the initiative will know roles and responsibilities.

Here is a suggested eFiling decision making structure:



Steering Committee: generally high-level managers and/or supervisors who can assign and commit staff to the initiative as needed. This group ensures a structured process for the initiative. The Steering Committee will provide constant guidance and oversight to the effort, its progress and deliverables, and will make most decisions. They will keep the Executive Sponsor informed and advise of specific action the Sponsor may need to take to remove barriers or to garner resources.

The eFiling Initiative Manager: Ideally, an individual who has project management skills, experience and/or training, dedicated in a full-time manner to the success of the initiative. This person provides daily direction, manages the schedule, serves as a single point of contact, directs/leads team members toward objectives, reviews and approves deliverables, handles low-level problem resolution, and liaisons to the Steering Committee.

The User Committee: Subject matter and business process experts for the initiative functions. Ethics Counselors, staff, maybe select FDR Filers & Reviewers. This group should analyze current agency FDR processes and practices, identify ways to improve workflow and achieve efficiency, and define how the eFiling system will support agency needs to make their work more efficient and effective and solve particular problems. The User Committee will evaluate software and technical solutions to their business requirements.

The Technology Committee: Agency technical staff. The Technology Committee takes its cues from the User Committee. Once the User Committee has defined the eFiling needs, the Technology Committee will analyze those needs with a focus on the agency’s current technology environment and potential “solutions.” The Technology Committee may be heavily involved in either “building” the solution in-house or evaluating solutions available elsewhere. This Committee will also have to make important recommendations about training, assigning, and hiring staff to implement, support and maintain the eventual eFiling system.

- Step 4 **Appoint an eFiling Initiative Project Manager (PM):** Pin the rose on someone as soon as possible. This action officer is the single point of contact for the initiative and everyone associated with it. Ideally the PM understands the agency FDR process and is familiar with project management.
- Step 5 **Seek eFiling information:** Gather information on other eFiling systems for consideration and background. (See Appendix A or contact OGE.)

Scope



Next, get a “big picture” grasp on your agency’s eFiling initiative, limited by what can be accomplished successfully. The overall initiative scope defines the boundaries of what is included in the eFiling initiative. It includes the case for eFiling, along with the timing, a budget, how you will gain user cooperation and engender enthusiasm, the service level you plan to provide, and the projected results. In short, it conveys the purpose and requirements — the ‘who,’ ‘what,’ and ‘why.’

Key Tasks:

- 1 Establish the agency eFiling Vision:** [If not previously completed] Vision answers the question: “What is eFiling success?” For example:

Replace the existing paper-based OGE 278 and OGE 450 reporting process with an online application that is efficient, accurate, and secure, eliminating most common mistakes.

Filers use a secure, web-based system to prepare, review, and submit a required financial disclosure report. **Reviewers** – supervisors and ethics counselors – review the report online before the **Designated Agency Ethics Official, or Designee**, approves the report online.
- 2 Name the initiative:** e.g., **eFiling FDRs**. This gives the effort an identity.
- 3 Get the big picture:** What internal and external issues will affect the eFiling initiative? For example, consider:
 - OGE guidance (e.g., DAEOgram on eFiling; FDR rules)
 - Agency personnel resources
 - Other agency experience with eFiling

- Availability of agency funding
- Current and planned agency technology

- 4 Develop the eFiling initiative’s business case:** your business case demonstrates the need and identifies the benefits of the initiative. A good one persuades its readers of the initiative’s merit and supports its funding and other resources.

It also demonstrates that the status quo (“error-prone, cumbersome paper reporting process”) is unacceptable.

Good business cases show operational benefits to the agency. So for the benefit of direct users of the system and the Executive Sponsor, for example, you may want to discuss broadly how implementing eFiling results in such benefits as:

- More accurate, timely, and accessible FDR information.
- Elimination of common errors that take time of Filers and ethics officials to resolve.
- Significant reduction of paper documents.

System users will want to know how it will make them more efficient and effective (e.g., saves time on preparing/eFiling later reports, avoids common errors), and how they can work better and faster (e.g., prepopulates later reports with “repeated” information from prior reports).

You may want to put a dollar value on any projected time savings. You could begin by identifying each step of the paper-based report preparation and time involved and the role of that person. Then you could apply a salary figure to that amount of time. See Appendix C for a sample to adapt.

- 5 Define the initiative’s scope:** Scope sets the boundaries. Defining scope also identifies which activities are “in” the project and which activities are excluded. Scope explains:

- What users want (functions).
- How well the user requirements are met (quality of).
- When and how it must be developed (constraints).
- Why (the value in the project).

Examples:

By December 1, 2011 develop and implement a secure, web-based, electronic filing system that guides Filers to eFile their FDR (similar to Turbo Tax for income tax returns) that improves FDR preparation and review and eliminates common errors.

Obtain and deploy agency-wide a secure, web-based electronic system for filing and reviewing required Financial Disclosure Reports by [date]. Users will use their Internet Explorer browser to access the software to prepare or review a report online without printing a report. User orientation materials will be prepared and provided to users by [date]. Migrate existing paper reports to the eFiling system by [date].

- 6 List preliminary objectives:** The User Committee could develop preliminary objectives by taking scope to the next level of detail.

For example:

- Secure – the eFiling system must be access-controlled and transmit and receive a user's information securely using SSL
- Eliminates common errors – uses drop down pick lists reducing a user's typos, ability to enter free text

- 7 Identify any assumptions/constraints:** Assumptions and constraints are circumstances and events that can affect the success of the eFiling initiative. They are generally beyond the control of the initiative Team. List those with high likelihood of occurring. For example, a constraint may be that there will not be ample or additional funding for hiring new or additional staff to support the effort. A technology assumption for an eFiling initiative, for example, may be that the agency will continue to use Internet Explorer for at least three more years. Another may address timing associated with filing deadlines (e.g., 15 Feb (OGE 450); 15 May (OGE 278)).

Listing the assumptions will provide assistance in making decisions and, in some cases, explaining some decisions.

- 8 Develop a timeline and preliminary budget estimate:** What is the desired timing for your initiative, including major milestones for kick off, planning, pilot, the implementation start date, and the implementation complete date. Your plan will include detailed milestone and timing information, so just include a high-level summary now. Document any constraints early since timing affects many of the other variables such as budget and training.

For example:

- By September 1 obtain DAEO approval of the eFiling initiative Scope
- By October 1 convene the eFiling Initiative Steering Committee
- ...
- By December 1 identify and train selected FDR Filers to participate in a pilot eFiling of OGE 450s
- By January 15 begin a pilot eFiling with selected Filers
- By March 1 identify and train selected FDR Filers to participate in a pilot eFiling OGE 278s
- By April 15 begin a pilot eFiling with selected Filers
- By . . .

- 9 Discuss Project Planning Methodology:** Briefly discuss the major planning tasks such as conducting a needs assessment, developing a requirements definition, doing a risk assessment, completing budget estimates, and developing the full plan. This gives all stakeholders an outline and order for planning tasks.

- 10 Get the Scope Approved:** With the Steering Committee endorsement, get the Executive Sponsor to approve the finished scope. That weds all to the effort.

Current versus Future



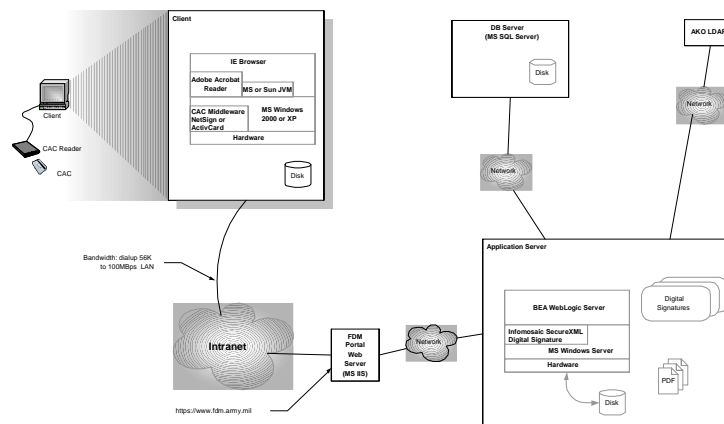
Describe the current as well as the future planned environments.

Key tasks:

- 1 **List your user technology:** current, and if known, planned migration to other software, network details. Your IT staff should assist with this information. It is important to ensure that your eFiling initiative can operate with your existing IT.
 - What kind of computers will they use to access the eFiling system?
 - What kind of operating system does it use? E.g., Windows 2000
 - What kind of internet browser(s) are used? E.g., Internet Explorer 8.0
- 2 **Do an eFiling Needs/Wants Analysis:**
 - Evaluate Agency's current FDR process identifying weaknesses that eFiling could fix or eliminate
 - Identify needs – features that will help users perform their FDR tasks better, easier, faster – more efficiently, more accurately
 - Identify Agency technology, e.g., hardware, software, that could impact eFiling
 - Develop general eFiling "requirements"
 - Put it together in a conceptual design

For example:

Conceptual Architecture



Word version:

The Filer accesses the web-based eFiling software, Adds and eSigns the report. Filers with an earlier report in the system use its information to “prepopulate” the new report.

The eFiling software emails the Filer’s reviewers (Supervisor and/or Senior Legal Counselor/Ethics Counselor) that the report is ready for their online review.

Reviewers complete and inform report Certifying Authority (DAEO) who reviews and completes the report.

Migration Plan



Once an organization has envisioned the eFiling system, the next step is planning to get there. The migration plan is your roadmap to changing from your current paper-based environment to your desired eFiling one. It includes both what you will do and how you will do it. View this plan as "in progress" so that everyone who uses it is confident that it is accurate and current.

Key tasks:

- 1 **Do the Agency eFiling Migration Plan:** the detailed roadmap guiding planning, acquisition, implementation, and management. It is a disciplined effort to produce decisions and actions. It should catalog the decisions about what to do, and when, why, and how. It is an inclusive process that should keep all initiative stakeholders “on the same page.” It has the specifics of getting eFiling in place in the agency.
 - Evaluate Agency’s current FDR process especially identifying weaknesses that eFiling would fix or eliminate

Planning Principles:

- Planning is a creative and dynamic process. Given the pace at which technology and business are changing, ideas and decisions made at a particular time may be altered significantly as new thoughts and information become available. Your plan will evolve and change as the scope and objectives become clearer and more mature.
- Planning is not linear. Some activities relate to and depend on other decisions. For instance, developing detailed objectives depends on finalizing the scope statement, while detailing deliverables can only occur after both scope and objectives are completed. However, scope, objectives, and deliverables may be revisited and modified pending the results of a thorough risk assessment and/or the resource requirements analysis.
- Effective plans are used, reviewed, maintained, and updated regularly.
- Successful planning requires management and control so that it does not go on indefinitely. Don’t fall victim to



“planning paralysis.” Instead, the project manager should set realistic timeframes and develop a schedule to control the planning process.

- 2 **Identify initiative team or workgroup:** If not done previously, identify who will assist and what their roles and responsibilities are. Assemble and involve them in these products.
- 3 **Scope review:** Carefully review your prior scope. Consider:
 - a. A scope statement that provides scope definition with supporting detail;
 - b. Objectives (measures for success) [Objectives are yardsticks to measure success. They are a critical part because they help the team, stakeholders, and users assess whether or not the finished eFiling product does what it was supposed to do, how well it works, and, ultimately, if it is a success. Thus, objectives must include measures of quality, time, cost, performance, reliability and/or functionality.]; and a
 - c. Scope Management Plan to control scope changes and avoid “scope creep.”Note: once a project starts:
 - Those involved learn more and realize that what they originally asked for may not be exactly what is needed, so a change in scope or requirements is necessary;
 - The business needs may change so that what was originally “in scope” is no longer needed (e.g., OGE changes FDR regulations or definitions – don’t report diversified mutual funds on OGE 450); or
 - Newer technology is available (e.g., another agency has a better solution).
- 4 **Schedule & Milestones:** Add detail to the earlier preliminary schedule with more milestones and the projected date of full agency-wide use of the eFiling system. If already out of FDR filing season (e.g., after 15 Feb for OGE 450 or after 15 May for OGE 278) consider focusing on New Entrant filers at first.
- 5 **Budget:** Estimate the expected direct and indirect costs for planning (e.g., any outside agency consultants), for obtaining the eFiling solution, for implementing it, and for sustaining and operating it.
- 6 **Risk Management Plan:** Identify potential risks to the initiative. Discuss how you anticipate preventing or minimizing them.
- 7 **Support Plan:** What is the model for support, including supporting the different eFiling system users (e.g., Filer, Reviewer, Ethics Staff)? Include steady-state support policies and levels, escalation paths, any third-party involvement, and how to reduce the need for application help desk support.

How your agency acquires the eFiling solution will affect what you do here. For example, if you build or operate the eFiling solution yourself you will need Help Desk and functional experts who understand it better than most users. These super users should be prepared to help other users and prepare training and training materials, including user self-help materials and any user guide(s). If, however, you do a “fee for services” acquisition by having another agency “turn key” it then that agency provides your technology support (if the terms of your agreement include it). You may need to anticipate eFiling questions for your

ethics staff along the lines of substantive reporting using the eFiling program. For example: a Filer might ask about reporting underlying assets in a managed investment account.

If your agency's Help Desk will have any eFiling application responsibilities address staffing issues, training of those personnel, supplementing the Help Desk with additional personnel, features to plan for, implementation escalation paths, and end-user self-help such as intranet content, Quick References.

- 8 **Communications Plan:** Decide how to inform agency users about the eFiling solution. Determine who and when that information will be distributed. Draft the information.
- 9 **Training Strategy & Plan:** Identify who will be trained, how and when that training will occur, and what training materials are needed. Document these. Include information on both end-user and support personnel training. Be sure to evaluate all training methods for the migration, including instructor-led training, brown-bag sessions, and “on-demand” computer-based training (CBT).
- 10 **Test Plan:** Include information on how you plan to test your new eFiling system. For example, you may plan to have several staff access the system as “pretend” Filers, others as report reviewers, and still others as certifying authorities. Someone will need to “register” each of the users in the appropriate roles and provide introductory guidance to them on their respective test roles and responsibilities. If that succeeds then consider a limited test with real filers, reviewers, and certifying authorities. Once that succeeds, consider a pilot of a significant portion of the agency users, perhaps New Entrant filers, before full agency-wide deployment.

Identify:

- Test scenarios
- How to measure success of the test
- Who decides on success

Proof of Concept



The goal of the Proof of Concept (PoC) phase is to carefully evaluate the eFiling solution to see how it performs the desired tasks. This can also be a showcase for final agency approval. This phase enables further feedback and refinement on the eFiling solution and is another opportunity for “fixing” it. Many agencies will use their ethics staff for the PoC. If you do that, temper the findings based on how representative these users are of your general Filer population.

Pilot



The goal of the Pilot is to validate the eFiling solution. Basically, prove that a select pilot group representative of the real agency users, successfully uses it. You also want their user experience feedback.

This validates the eFiling solution. In addition, it provides an evaluation of the readiness of the eFiling team and support staff to properly deploy and support the eFiling solution. The lessons learned here will help further refine the agency-wide implementation.

Key tasks:

- 1 **Identify pilot activities:**
 - What is required? For example, register users, have users prepare a report, have reviewers review a report, then have a Filer amend a previously submitted report.
 - Select and notify pilot participants; train as necessary
 - Identify user support and feedback mechanisms
 - Create the pilot schedule
 - Inform pilot participants
- 2 **Review the pilot:** Cover
 - Issues
 - Successes
 - Failures
 - Lessons Learned

Risk Assessment



A risk assessment documents risks and how they can be mitigated. It is based on the results of the Proof of Concept, the Pilot, and other planning factors such as the budget. Its primary purpose is to increase the probability of a successful implementation by decreasing the degree of project risk. The items listed below will help focus your project on areas that may pose risk.

Key Task: prepare a risk assessment checklist covering these areas:

- Envisioning
 - Are there conflicting or competing projects?
 - What are the “real” deadlines?
 - Do members of various sponsoring organizations have differing visions of initiative methods and outcomes?
 - Are any other business or political considerations involved that might impact deployment?

- Budget
 - Has the budget been approved at the appropriate agency level?
 - What factors could cause cost overruns? How will overruns be handled?
- Human Resources
 - Are there an appropriate number of people on the team? If not, identify:
 - Identify how this could impact deployment.
 - Plan to add people for those areas that are lacking support, including timing.
 - Are people with the appropriate technical and subject matter skills available? If not, identify:
 - Which areas need additional technical skills.
 - How to provide the necessary technical training or hire those with the desired technical skill.
 - Are the people involved in the project dedicated or part-time?
- Technology
 - Are new technologies being deployed other than the eFiling solution?
 - What risks do those pose to the successful deployment of the eFiling solution?
 - How do you plan to mitigate or remedy those risks?

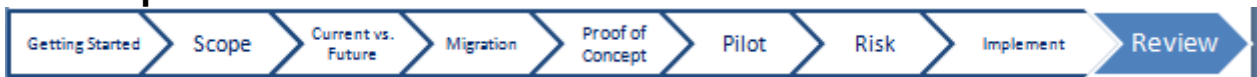
Implementation



implement your eFiling. Plan how you will get your intended users using the eFiling solution. Detail these tasks:

- Communicate with users – What do they need to know and when? Who tells them to use the new eFiling solution? Draft what that person says.
- Conduct user training – Which roles will be trained? How much is enough? Is it so simple even a cave man can do it (without formal training)? Will a short, 2 or 3-page screen shot Quick Reference be enough? Consider techniques other eFiling agencies have used.
- Migrate any paper reports – how will you manage the prior paper reports?
- Ensure ethics support staff are prepared and ready to assist Filers and reviewers
- Obtain user feedback – will you survey the agency users or let them send comments? Explain how to provide feedback in the eFiling announcement about preparing the FDR.

Post Implementation Review



Now, review how everything went. Include future needs discovered during the implementation and use. User feedback is particularly useful. Several users will readily tell you any shortcomings. Include a critical review of the overall process, team, and results. Collect and evaluate user feedback. Review all major areas of the implementation, especially:

- Communication
- Migration
- Support
- Training
- Future Directions

Cover:

- Issues
- Successes
- Failures
- Lessons Learned

Prepare the Executive Summary

Summarize these sections in the executive summary:

- Scope
- Current versus Planned Environment
- Migration Plan
- Proof of Concept
- Pilot
- Risk Assessment
- Implementation
- Post Implementation Review

The Executive Summary persuades and interests agency/ethics leadership that the initiative has merits and is achievable.



Conclusion

Three Basic Rules for eFiling Success:

1. Moving an agency to eFiling is challenging. Successful eFiling requires strong agency leadership, good planning, some heavy lifting (“sweat equity”), and skillful management.
2. Planning and deploying eFiling in an agency takes a coordinated team and continuous nurturing. Think of it as a lifecycle, a process with several stages, including planning, procurement, implementation and management.





Successful implementation of a system really signals the beginning of a new phase of evaluating the recently adopted system and planning for maintenance, upgrade, enhancement, and replacement. With rapid advances in hardware and software, new system functionality is available almost immediately after a system is implemented.

3. Your opportunity to implement a eFiling initiative improves when it is appropriately linked to the agency's strategic mission, goals, and objectives.



Appendix A

Agencies eFiling FDRs (July 2011)

OGE invited several agencies to provide information on their eFiling programs. Four chose to do so:

- Army
- DoJ/Executive Office for United States Attorneys
- National Technical Information Service (NTIS), US Department of Commerce
- National Aeronautics and Space Administration (NASA)
- National Science Foundation

Their information follows.

Agencies eFiling FDRs (July 2011)

Agency Name: Army

Contact: George Hancock, Associate Deputy General Counsel (Ethics & Fiscal), FDM Program Director, 703.696.5512; email: geo-hancock@us.army.mil; Gilbert Carlson, Deputy FDM Program Director, 703.696.5506; email: gilbert.carlson@us.army.mil. Software: Dave Garrett, Chief, Architecture Services Division, US Army Software Engineering Center, 443-861-9048 David.k.garrett.civ@mail.mil

Description: Financial Disclosure Management (FDM) is a secure, web-based software program that helps/guides Filers to accurately prepare and electronically file an OGE 278, Public FDR, or an OGE 450, Confidential FDR. It simplifies FDR preparation and review, saving time and eliminating common errors.

Used since: 2004 (278s); 2005 (450s); over 9,000 SF/OGE 278s, over 230,000 OGE 450s eFiled

Functions/features (mark all that apply):

- Electronically linked into human resources system
- Master list of Filers (*agency-wide; DAEO-wide; local Ethics Official view*)
- Notices and reminders to Filers (*standard agency-wide; local tailoring*)
- Notices and reminders to Reviewers (*Filer eSign triggers*)
- Tracks receipt of report (*Filer eSign puts report Under Review*)
- Tracks date of initial review (*Reviewer eSign or end review screening*)
- Tracks extensions (*Ethics official may record extension*)
- Tracks certification date
- Prepopulates in subsequent years following initial filing
- System displays comparison view of filers last two reports
- Archives reviewer notes and comments
- Notifies Filer of report certification
- System displays oversight/management views of report processing
- Other (describe): Users may add Notes, Comments, Attachments; Review aids – flagging system of incomplete information; 450 Certifier Success Score (compares report processing to OGE 60-day review rule); data extraction for annual agency ethics report; data extraction on Filers/Reports for OGE Program Reviews (e.g., master filer list, report status, processing, ethics training of Filers)

Filer Features:

- ★ Filers can prepare the report themselves or delegate entry to an assistant.
- ★ Wizard guides the filer through the financial disclosure reporting process.
- ★ Filers can attach electronic documents to their report (e.g., job descriptions).
- ★ Filer “eSigns” the report securely online.
- ★ e-mail notifications to reviewers when the report is complete or amended.

Reviewer Features:

- ★ Online work list to track status of disclosures “in-process”.
- ★ Automatic “flagging” of report issues using OGE business rules.
- ★ Comments can be added electronically.
- ★ Report “Compare” view when Filer has 2 or more reports online
- ★ Reviewer “eSigns” report securely online.
- ★ Automatic e-mail notifications “*move a report*” along.
- ★ Audit trail tracks significant events.

Agency Benefits:

- ★ Secure
- ★ More accurate reporting the first time
- ★ Real time visibility of report processing agency-wide
- ★ Data extraction tools to support the annual agency ethics report and OGE Program Reviews

Secure: Access to a Filer's reports is limited to specifically authorized personnel. Security features include user authentication, SSL 128-bit encryption, and network and physical security protection.

FDM’s Resources page, <https://www.fdm.army.mil/helpSupport/resources.htm>, is a financial disclosure knowledge inventory of SOPs, checklists, and references.

Informational website: <https://www.fdm.army.mil>

Get FDM information: <https://www.fdm.army.mil/whatIsFDM/getFDM.htm>

FDM Brochure: https://www.fdm.army.mil/documents/FDM_Brochure.pdf

FDM is secure, professional OGE 278 & OGE 450 reporting



Agencies eFiling FDRs (July 2011)

Agency Name: DOJ/Executive Office for United States Attorneys

Contact: Lucy Hurley, Management Analyst (202) 252-1557

Description: (including number of e-filed reports and types of forms accommodated)
3,645 reports filed to date, OGE 278 reports only.

Used since: January 2009

Functions/features (mark all that apply):

- Electronically linked into human resources system
 - Master list of Filers
 - Notices and reminders to Filers built in, not using entirely yet
 - Notices and reminders to Reviewers
 - Tracks receipt of report
 - Tracks date of initial review
 - Tracks extensions
 - Tracks certification date
 - Prepopulates in subsequent years following initial filing
 - System displays comparison view of filers last two reports
 - Archives reviewer notes and comments can enter on report/does not carry over
 - Notifies Filer of report certification
 - System displays oversight/management views of report processing
 - Other (describe) _____
-

Informational website:

Agencies eFiling FDRs (July 2011)

Agency Name:

US Department of Commerce, National Technical Information Service (NTIS)

Contact:

Patricia S. Gresham
Sr. Program Manager
Office of Federal Services
National Technical Information Service
Department of Commerce

Office: 703-605-6123

Cell: 571-259-8306

Fax: 703-605-6373

Email: pgresham@ntis.gov

Description: (including number of e-filed reports and types of forms accommodated).

FDonline is a government-wide, SaaS-based Financial Disclosure automation system securely hosted and provided to other federal entities through NTIS' e-Gov initiatives. Over 60,000 reports have been e-filed in the system. Agencies using NTIS' FDonline and its Common Service Platform to support their Financial Disclosure, Entry on Duty, and Telework programs include USDA, DOI, FAA, TSA, DOJ, PBGC, SIGIR, NLRB, OPIC, and IMLS.

Used since: 2005

Functions/features (mark all that apply):

- ✓ Electronically linked into human resources system (can be integrated but customers have not requested that at this time)
- ✓ Master list of Filers
- ✓ Notices and reminders to Filers
- ✓ Notices and reminders to Reviewers
- ✓ Tracks receipt of report
- ✓ Tracks date of initial review
- ✓ Tracks extensions
- ✓ Tracks certification date
- ✓ Prepopulates in subsequent years following initial filing
- ✓ System displays comparison view of filers last two reports
- ✓ Archives reviewer notes and comments
- ✓ Notifies Filer of report certification (adding this)
- ✓ System displays oversight/management views of report processing

Other (describe):

Agency Benefits:

- ✓ Less time on paperwork means more time to improve ethics and avoid potential conflicts

Filer Benefits

- ✓ Intuitive TurboTax[®] like intelligent interview wizard guides filer through process
- ✓ Wizard skips unnecessary pages based on filer answers to questions to save time
- ✓ Context sensitive help hyperlinks make instructions easy to reach – “1 click away”
- ✓ Saves information from year to year so filer only has to update and maintain information
- ✓ Ability to enter investment vehicles and underlying assets to reduce data entry year to year
- ✓ All work is done online at the desktop with full ability to enter, edit, correct and delete text
- ✓ Drop down lists of stocks and mutual funds provide easy click and fill data entry
- ✓ Automated notifications and reminders ensure paperwork is completed in a timely fashion

Reviewer Benefits

- ✓ Save time by eliminating incomplete forms - forces filers to complete required fields
- ✓ Review filings electronically from anywhere the internet can be accessed 24/7/365
- ✓ Provides online information about stocks and mutual funds to aid conflicts review
- ✓ Multiple email templates for quick generation of written communications to filers
- ✓ Provides online list of prohibited holdings to flag potential conflicts
- ✓ Provides ability to compare to filer’s forms from prior year to aid conflicts review
- ✓ Reviewer page organizes data for reviewer and provides .pdf view of 278/450/450A form
- ✓ Reviewers can add comments to note actions and keep other reviewers informed
- ✓ E-Stack allows reviewer to “flip” through multiple filings
- ✓ Ethics Officials can electronically review and approve completed forms
- ✓ Managers can more easily balance workload among multiple reviewers

Program Administrator/DAEO Benefits

- ✓ Current status of all filings can easily be seen and acted on
- ✓ Full system notification capabilities to draft and send scheduled notices and reminders
- ✓ Easy entry of new filers with automatic notices of filing obligations and deadlines
- ✓ All records are easily accessible online to OGE and other reporting requirements
- ✓ Full security (access and modification, audit traceability, disaster recovery, COOP, C&A)
- ✓ Robust online help for all users to reduce questions from program participants

Informational web site link: www.ntis.gov

Agencies eFiling FDRs (July 2011)

Agency Name: National Aeronautics and Space Administration (NASA)

Contact:

- For information about the eFiling system or to schedule a demo, contact Daniel Mangieri, Program Specialist at the NASA Shared Services Center, at (228) 813-6008 or daniel.w.mangieri@nasa.gov.
- For information from an attorney's perspective, contact the Adam Greenstone, NASA's Alternate Designated Agency Ethics Official at (202) 358-1775 or adam.f.greenstone@nasa.gov.

Description: The Ethics Program Tracking System (EPTS) is a secure, web-based management system for NASA's financial disclosure process and for tracking completion of annual ethics training. The EPTS system provides secure electronic notification, tracking, filing, signature, review, and storage of the Office of Government Ethics (OGE) Confidential Financial Disclosure Report (OGE-450 and 450-A) and the Public Financial Disclosure Report (SF 278).

Used since: January 2007

Functions/features:

- X Electronically linked into human resources system
- X Master list of Filers
- X Notices and reminders to Filers (The EPTS system keeps an archive of the date/time notices were sent to the filers.)

- X Tracks receipt of report
- X Tracks date of initial review
- X Tracks extensions
- X Tracks certification date.
- X Prepopulates in subsequent years following initial filing
- X Allows reviewer to make corrections on form
- System displays comparison view of filers last two reports
- X Archives reviewer notes and comments
- X Notifies Filer of report certification
- X System displays oversight/management views of report processing
- X Other (describe): EPTS also supports other capabilities and features such as:
 - Employees can file their forms at work or at home, on PCs or Macs, because the system is web-based and secure.
 - Filers and reviewers can electronically sign the forms.
 - Reviewers can annotate corrections on forms and make comments.
 - Forms can be set up for supervisory review and for initial review by a paralegal and can be easily reassigned from one reviewer to another if the need arises.

- A cautionary letter builder allows reviewers to check boxes indicating the holdings that are actual or potential conflicts. The letter builder then compiles these holdings into a customized letter template which can be edited by the reviewer and sent to the filer.
- Copies of all forms, letters, and training information are stored for easy retrieval at any time.
- Annual ethics training is tracked in the system for each filer. NASA uses live and computer-based training and the EPTS system is set up to import course completion data from the training system.
- A variety of reports can be run, including: form status (who filed or did not file), status of review, numbers of forms filed, completion of annual ethics training, ethics pledge, late fee, and statistical information for the OGE annual report.
- Folders are available in each filer's profile for the upload of attachments and other scanned ethics documents, including: waivers, recusals, ethics opinions, ethics pledges, evaluation board reviews, outside employment approvals, and post-employment opinions.
- Forms are archived for 6 years and then destroyed in accordance with regulation.

Informational Web Site Link: <http://epts.nssc.nasa.gov>.

Agencies eFiling FDRs (July 2011)

Agency Name: National Science Foundation

Contact: Robin Clay

Description: Ethics program management tool using Sharepoint. Used for financial disclosure filing (900 Form 450 Filers and 200 Form 278 Filers), tracking ethics training, and maintaining ethics advice folders.

Used since: 2009

Functions/features (mark all that apply):

- Electronically linked into human resources system
- Master list of Filers
- Notices and reminders to Filers
- Notices and reminders to Reviewers
- Tracks receipt of report
- Tracks date of initial review
- Tracks extensions
- Tracks certification date
- Prepopulates in subsequent years following initial filing
- System displays comparison view of filers last two reports
- Archives reviewer notes and comments
- Notifies Filer of report certification
- System displays oversight/management views of report processing
- Other (describe) _Master list also tracks ethics training requirement. Separate library for advice folders for each filer so that reviewer can access all advice, waivers, etc. online while reviewing report, and ethics officials can see all prior advice provided to employee. Separate library for snapshot view of potential employee conflicts/resolution that is filled in by ethics official when providing pre-employment interviews.

Informational web site link:

Internal to NSF.

Appendix B

Sample eFiling System Requirements

Developing the list of needs and wants is one of the fun parts of any eFiling initiative. Do so without constraint initially. You can always cut the list to the “must haves” later.

This is a partial sample list of possible system requirements for an eFiling FDR system. Decide whether your eFiling initiative will include both the OGE 278 and OGE 450 or only one FDR type. This list does not include OGE access to the system to review FDRs or see agency eFiling progress.

Must Have

System

The system shall support the online and manual completion of the OGE-278, the Public Financial Disclosure Report, and the OGE 450, Confidential Financial Disclosure Report, and the reporting/review process. The system must be accessible via the web using Internet Explorer and SSL should be the primary encryption transmission method for the Web application.

The system must accommodate and comply with record retention requirements and the Government Paperwork Elimination Act (GPEA) and its associated implementation guidance; the requirements specified in Section 508 of the Rehabilitation Act of 1973, as expanded under the Workforce Investment Act of 1998; the Privacy Act; the Freedom of Information Act (FOIA); and applicable federal regulations.

Pre-registration

The system must have an authorization service that is capable of supporting a scripted or batch pre-registration of authorized users.

Registration

The System shall allow new Filers and Reviewers to self-register. Pre-registration data will be available to the system for user name validation.

Login/Logout

The system will have a login prompt for the user to access the system.

The system shall validate user names and passwords against a user data source.

The system must use “smart card” technology or enable authorized Filers and Reviewers to establish new PINs or passwords and change existing PINs or passwords through confidential web page.

The system will use standard encryption techniques (i.e., SSL) for all operations.

Expired or disabled credentials will not permit system entry and will direct the user to contact an administrator.

OGE-278 Form

The system shall enable authorized Filers to start a new OGE-278 report for online completion, edit an online OGE-278 Form in process, and to view a Filer’s previous report(s).

The system shall allow a user to create a new report using information from a Filer’s prior report (e.g., “pre-populate”).

The system shall guide a Filer through a smart form wizard to complete all required data fields on the OGE-278 report, including Filer and position information, Schedule A, Schedule B Parts I & II, Schedule C Parts I & II, and Schedule D Parts I & II.

The application shall provide Filers with a Form navigation capability to facilitate access to all Form sections, sub-sections, and comment areas.

The system must record all data input by the Filer.

The system must provide pull-down lists for each field where this is possible to expedite Filer input and increase data consistency.

The system shall auto-fill fields that required identical data that has been previously input into the report.

The system shall pre-fill fields where possible.

The system shall provide automatic field syntax enforcement and corrections throughout the application.

The system shall allow the Filer to return to a previous screen to add or change data during a single session.

The system must allow the Filer to save partially completed reports (before submission); it must allow the Filer to complete the report in one or more "sessions."

The system should link any Reviewer comments to the item or section to which they apply upon selection of a "view comments" mode by the Filer.

The system shall allow the filer to upload files as attachments to the OGE-278 report in various formats such as word processing files, spreadsheets, and image files.

The system shall provide online help to assist the Filer in completing all sections of the OGE-278 report.

The system shall provide access to a User's Guide that provides text instructions or directions for all areas of the OGE-278 Form.

The system shall provide Filers with the ability to print the complete User's Guide.

The system shall provide access to a user glossary.

The system shall provide access to Common Questions & Answers (and/or helpful hints) associated with each section of the OGE-278 report.

The system shall provide access to an OGE provided OGE-278 Reviewer's Guide.

The system shall provide authorized Reviewers to view the OGE-278 report contents, insert comments and view comments.

The system must allow Reviewers to retrieve and view all reports created by Filers for whom they have a review relationship/access authority.

The system must allow Reviewers to input and save comments associated with each section on a Filer's report.

The system should allow multiple Reviewers to simultaneously view the same report.

The system shall allow the Reviewer comments to be selectively deleted following approval of the OGE-278.

The system shall allow the Filer to apply for a Late Fee Waiver.

The system shall allow authorized Reviewers to approve or disapprove a Late Fee Waiver request.

The system shall be capable of tracking the status of an individual OGE-278 report and associated components based upon its location in the process.

The system shall allow the automatic update of the tracking fields for those reports that are being filed electronically.

The system shall allow for the manual input of data into the tracking fields for those forms that are being filed manually.

The system shall identify the current status of an OGE-278 report.

The system's audit trail shall capture tracking data such as date and time stamps of report progress beginning after the Filer eSigns the report (e.g., Filer eSign, amendment, comments, Reviewer eSign).

The system shall track changes made to any Filer eSigned/submitted version of an individual OGE-278.

Products and Reports

The system shall be capable of printing an individual OGE-278 report and associated schedules as they exist at any point in the application workflow.

The system should provide facilities that enable authorized users to query a database of all OGE-278 reports and associated information for all Filers over time and create reports based on the queries. (i.e., access the data and using SQL, generate a custom report)

The system shall generate reports that can be viewed on screen and printed without special configuration by the print hardware and software of leading printer manufacturers.

The system shall output reports in a read-only file for electronic distribution.

The system shall provide an administrative interface to facilitate the creation of reports associated with an individual OGE-278 report.

The system shall generate a signed on-line tracking report for an individual OGE-278 report that show what stage of the application workflow the report is in, time tags associated with its movement across the workflow, and identification of individuals involved in the steps of the workflow.

The system shall provide an administrative interface to facilitate the creation of reports to assist authorized users in the review of OGE-278 reports

The system shall permit authorized reviewers to compare the OGE-278 Form of an annual filer to a previously approved OGE-278 report. The application shall highlight those fields that have been modified when compared to the previously approved OGE-278 report.

The system should provide tools that enable authorized users to query a database of all report data for all Filers using a text search.

The system should create an easily accessed list of current Filers and their status by using agency.

The system shall provide an administrative interface to facilitate the creation of tracking reports of all OGE-278 reports in the system.

The system shall be able to generate status reports of the OGE-278 reports being tracked in the application.

The system shall generate a report of the current completion status (e.g., Draft, Under Review, Amendment, Complete) of each report, including time, who, where, next steps, and completed steps.

The system shall provide an ad-hoc query tool/capability to facilitate the generation of additional reports.

The system shall generate required statistical reports used to prepare the annual OGE report.

Report Submission & Approval

The system shall allow the Filer to submit the report electronically.

The system shall allow the filer to electronically draft an OGE-278 that may be reviewed by members of the Filer's report review chain.

The system shall allow the filer to electronically submit and amend a FDR.

The system shall allow the DAEO to electronically submit the FDR and any Draft Ethics Agreement for OGE Pre-Clearance Review.

The system shall allow an authorized OGE Reviewer to electronically approve the FDR and Draft Ethics Agreement following a successful Pre-Clearance Review.

The system shall allow the filer to electronically submit the Final FDR and Final Ethics Agreement to the agency DAEO.

The system shall allow the DAEO to electronically submit the Final OGE-278 Form, Final Ethics Agreement, and any DAEO Opinion Letter to OGE.

The system shall require that all users be required to confirm that the OGE-278 FDR is being submitted or approved.

Workflow Administration

The system shall provide a facility for authorized administrators to create, modify, and delete User Groups that contain predefined sets of permissions for different user types

The system shall support the definition of up to 10 User Groups having different permissions for different phases of the application workflow. User Groups may include: Filer, Filer's Assistant, DAEO, DAEO staff, OGE Reviewer, OGE Director, OGE staff, Other (TBD).

The system should enable an OGE manager with staff assignment authority to assign an individual Filer's FDR to a specific Reviewer or multiple Reviewers.

The system shall allow the appropriate DAEO staff to be provided access to the FDR during its initial completion by the Filer prior to the Filer eFiling the FDR.

The system will permit only one editable copy of a Form or Form Package at one time.

The system shall allow only authorized users be capable of viewing Comments to an individual OGE-278 FDR.

The system shall require that only the Filer or the Filer's designated Assistant may create or modify a draft OGE-278 FDR.

The system shall allow the Filer to delegate permissions or authority for the creation and/or completion of the Filer's OGE-278 FDR to an Assistant(s).

The system shall permit only the Filer to eSign/submit the OGE-278 FDR.

The system shall provide an interface for workflow participants to be identified and validated in the system.

The system shall provide a facility for authorized administrators to assign all application users to appropriate user roles.

The system will provide automatic electronic validation of FDRs at major stages of preparation.

The system will allow for the creation and modification of business rules associated with the workflow participants.

The system shall have the capability to automatically distribute e-mail notification based upon the completion of specified tasks in the workflow.

The system shall automatically generate an email notification to the Filer.
The system shall automatically generate an email notification when the Filer eSigns/submits the the OGE-278 FDR.
The system shall automatically generate an email notification to the Reviewer when the Filer eSigns/submits an OGE-278 FDR.

The system shall allow authorized users to generate an ad hoc e-mail.

Form Administration

The system shall allow authorized users to access an "Application Administration View" to perform administrative functions.

The system shall provide an interface for the administrator to create and maintain referential data used in the FDR (i.e. drop-down lists).

The system shall allow administrators upon direction of the DAEO (or designee) to delete erroneous records (even if submitted).

The system will allow the administrator to maintain saved records by initiating, either manually or automatically, the archiving or de-archiving of FDRs based on established criteria. In this regard, see the National Archives and Records Administration (NARA), toolkit for managing electronic records, <http://toolkit.archives.gov/pls/htmldb/f?p=102:1:11077972001844564795::NO>. The NARA eRecords Management Resource Guide includes links to records management principles that apply to electronic signature technology generally, <http://www.archives.gov/records-mgmt/policy/electronic-signature-technology.html>, and records management guidance to Federal agencies for PKI digital signature authenticated and secured electronic transaction records. <http://www.archives.gov/records-mgmt/policy/pki.html>. The latter includes:

Requirements Definition and Implementation Planning

Information Systems (IS)11 <http://www.archives.gov/records-mgmt/policy/pki.html#footnote11#footnote11>, including those that agencies use to implement PKI-based electronic transaction applications, will produce new records or augment existing records. A critical first step in several of the system development stages is the identification, definition, development, and refinement of the data model that includes treatment of the PKI-based digital signature transaction records that will be created and should be managed. ...

Technical Architecture

Network facilities within the security architecture should enable session timeouts based on configurable inactivity thresholds.

The system must support 50,000 users and be capable of scaling to support 300,000 users.

The architecture must not require the installation of software on end-user computers beyond standard browsers.

Web servers in the e-Form computing environment providing confidential information or financial transactions must securely identify and authenticate themselves to users. The system should not permit web server's to be positioned in front of the firewall.

The application and security architecture must support the defined user roles and levels of permissions/access to FDR data.

The system should provide a standards-based Relational Database Management System (RDBMS).

The system shall support the following environments.

- Microsoft SQL Server 2003
- Internet Explorer
- E-mail platforms – Exchange/Outlook

Administration

The system must provide an administrative interface to facilitate the creation and deletion of user accounts, and modify associated account permissions. The system should provide for this capability to be delegated to any level of an agency.

The system should offer a facility, for use by select authorized administrators, which would enable the locking of a selected user account.

The system should provide a capability that enables data to be securely retained for a period of time definable by the system administrator in accordance with OGE retention policies (e.g., 6 years for all submitted reports).

The system should provide a capability that enables data to be archived after a set period of time and to retrieve data from archives in original and FDR Format.

The system shall provide an Audit Event Recording Tool to record FDR events.

The system must establish and maintain secure audit logs of system administrator and security administrator activities within the computing environment.

The audit trail shall be protected from unauthorized modification. Log entries should be digitally signed by the server to guarantee authenticity.

OTHER Ethics Agreement

The system shall allow authorized users to view and input data into an Ethics Agreement summary form for each filer. An ethics agreement may consist of five components: Blind Trusts, Recusals, Waivers, Divestitures, and Resignations.

The system shall allow authorized users to view and input data on Blind Trusts including if a Blind Trust is a part of the Ethics Agreement, if the agreement is satisfied, and the date that compliance was attained.

The system shall allow authorized users to view and input data on Recusals, including if a Recusal is a part of the Ethics Agreement, if the agreement is satisfied, and the date that compliance was attained.

The system shall allow authorized users to view and input data on Waivers, including if a Waiver is a part of the Ethics Agreement, if the agreement is satisfied, and the date that compliance was attained.

The system shall allow authorized users to view and input data on Divestitures, including if a Divestiture is a part of the Ethics Agreement, if the reporting official has applied for a Certificate of Divestiture, if the agreement is satisfied, and the date that compliance was attained.

The system shall allow authorized users to view and input data on Resignations, including if Resignations are part of the Ethics Agreement, if the agreement is satisfied, and the date that compliance was attained.

Blind Trusts

The system shall allow authorized users to view and input data concerning multiple Blind Trusts for an individual Filer.

The system shall allow authorized users to view and input tracking data on each individual Blind Trust, including settler, trustee, contact information, date of certification, last report, attorney and accountant information, and additional details.

Certificate of Divestiture

The system shall provide the capability for authorized users to input data concerning multiple Certificates of Divestiture for an individual user account.

The system shall capture detailed tracking information on each individual Certificate of Divestiture, including CERT #, date logged, request initiator, date materials were received, date certification was issued, the assigned reviewer, and additional comments.

Agency Letters

The system shall allow authorized users to create and modify a standard Ethics Agreement Letter.

The system shall allow authorized users to create and modify a standard DAEO Opinion Letter.

The system shall allow authorized users to create and modify a standard OGE Opinion Letter.

The system shall allow authorized users to create and modify a standard OGE Director's Letter.

The system shall allow authorized users to create and modify a standard Earned Income and Honoraria Update Letter.

Appendix C

Sample Time Savings Valuation Methodology

Saving users time is one key eFiling benefit justifying eFiling. To calculate savings, first determine the approximate time required in the paper-based reporting system. Then, estimate the time that will be saved over several year's use for each user role. Next, assign a dollar value to that time based on the user's salary and role.

Time saved/value realized varies based on grade/experience of different users involved in the report preparation and review process.

Base salary used	Time (hours)	Cost	FDM Time Saved Year 1 Use (hours)	Savings (Projected) Year 1 Use	FDM Time Saved Year 2 & Beyond (Projected)	Savings (Projected) Per Year Year 2 & Beyond	Accumulated Savings Years 1 – 3 per report
278							
Filer (GO/SES \$140,000 ÷ 2008 hrs per year = \$70/hr)	3.0	\$210			1.0	\$70	\$140
Supervisor (GO/SES \$160,000 ÷ 2008 hrs per year = \$80/hr)	1.0	80	.25	\$20	.5	40	100
Technical Reviewer (GS 7/7 \$18/hr)	2.0	36	1.0	18	1.5	27	72
Conflict of Interest Reviewer/Legal Advisor (GS 13/7 \$38/hr)	2.0	76	1.0	38	1.5	59	156
Report Certifier Staff to Track Reports (GS 7/7 \$18/hr)	0.5	9	0				
Report Certifier (DAEO/ADAEO/DDAEO) (\$70/hr)	1.0	70	0.5	35	.5	35	105
Total	9.5	\$481	2.75	\$111	5.0	\$231	\$573
450							
Filer (\$96,000 ÷ 2008 hrs per year = \$48/hr)	1.5	\$72			1.0	\$48	\$96
Supervisor (GO/SES \$140,000 ÷ 2008 hrs per year = \$70/hr)	0.5	35			.25	15	30
Report Certifier Staff to Track Reports (GS 7/7 \$18/hr)	0.5	9					
Report Certifier (\$70/hr)	1.0	70	.5	35	.5	35	105
Total	3.5	\$186	.5	\$35	1.75	\$98	\$231

Value of time saved:

- OGE 278 report preparation and processing at \$573 per filer;
- OGE 450 at \$231 per filer.

This estimate does not include value for improved report processing efficiency (e.g., elimination/avoidance of passing paper reports through the report review chain). It also does not include preparation/review of “Nominee” reports, which are processed outside FDM.

It does presume use “agency-wide” over three years.

The table below shows projections at 100%, 90%, and 80% Army-wide for the first 3 years FDM usage after FDM 450 is deployed. The 90% and 80% figures recognize that it is unlikely that every agency filer will use FDM initially.

Filers	100%	Savings @ 100% FDM Use	90%	Savings @ 90% FDM Use	80%	Savings @ 80% FDM Use
Army 278s	800	\$458,400	720	\$412,560	640	366,700
Army 450s	38,000	\$8,788,000	34,200	7,900,200	30,400	7,022,400
Total		\$9,246,400		\$8,112,760		\$7,389,100

You could prepare a similar calculation for your eventual agency-wide use of your eFiling solution.

Appendix D Interagency Ethics Council eFiling Work Group Members

(formed July 2007)

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Work Group Mission/Purposes:

1. Collaborate on eFiling FDRs
2. Develop "Vision" of eFiling FDRs in the Executive Branch, including OGE visibility
3. Evaluate and promote electronic filing and review of Financial Disclosure Reports (FDRs) through a web-based electronic filing system
4. Identify desired eFiling features (e.g., prepopulate from prior report, highlight changes in reports, stock/mutual fund drop down list, Filer Assistant), "best practices" & policies (e.g., mandate eFiling to drive per report cost down)
5. Share information with agencies interested in implementing eFiling

First draft: https://www.fdm.army.mil/PM_Reference_Docs/eFilingRoadmapDraft1.doc

Appendix E

OGE eFiling References*

OGE DAEOgram DO-07-014, *Guidance on Electronic Filing of Public and Confidential Financial Disclosure Reports*,

http://www.usoge.gov/pages/daeograms/dgr_files/2007/do07014.html

OGE Report: *Elements of a Successful Financial Disclosure Program* (March 2009)

http://www.usoge.gov/ethics_docs/office_agency_prog/prdrptfocused_0309.pdf

NASA-Electronic Filing of Financial Disclosure Reports May Increase Timeliness, Consistency, and Accuracy of the Financial Disclosure Program (2009)

http://www.usoge.gov/ethics_docs/agency_model_prac/nasa_efiling_fin_discl.aspx

Army-Electronic Filing of Financial Disclosure Reports May Increase Timeliness, Consistency, and Accuracy of the Financial Disclosure Program (2009)

http://www.usoge.gov/ethics_docs/agency_model_prac/efiling_fin_discl.aspx

*These links are to the OGE website from mid-August 2011.