Financial Disclosure Management (FDM) System Overview

FDM Program Management Office
Army Office of the General Counsel
Ethics & Fiscal

usarmy.pentagon.hqda-ogc.mbx.ef@mail.mil

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OGE 278s – Transition to Integrity

- **Effective January 1, 2020, <u>all</u> DoD OGE 278s will be filed using OGE's Integrity filing system.**

- **The <u>only</u> OGE 278s filed in FDM after that date will be Termination or Combination reports due prior to August 13, 2020.**

- **OGE 450 Confidential Financial Disclosure Reports will continue to be filed in FDM.**

FDM is…

- Office of Government Ethics (OGE) approved, secure, web-based application that improves the financial disclosure report preparation, filing, review, and tracking process

- Paperless report and online review using eSignatures

- Works similar to income tax filing software:
  - Guides filer through questions about reportable financial information
  - Flags missing and incorrect information
  - Starts each report with prior report information – "prepopulation"

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FDM Provides…

Centralized administration & monitoring with tools to:

- Remind & notify filers, supervisors, and POCs
- Permit initial screening/reviews and comments by supervisors and support staff
- Compare current report data to prior report for reconciliation
- Upload supporting documents & guidance
- Run management reports & export data to Excel
- Extract data for OGE Annual Agency Questionnaire
- Track annual ethics training
- Purge at record retention expiration

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Benefits

Efficient

Report wizard leads users through the report form filling and review process. FDM's paperless workflow eliminates the physical hand-offs between filers and reviewers. Existing filers "pre-populate" reports from earlier ones. Reviewers have a report "Compare" function for repeat filers (2 reports in FDM).

Accurate

Incorporates Office of Government Ethics (OGE) business rules ensuring accurate and consistent reports. Reduces common errors.

Secure

Only a filer and his/her review chain can see the report. All information is protected through the use of security features such as SSL 128-bit encryption and user authentication.

Access

Convenient access via Internet

. . . to assist reviewers get to Conflict of Interest analysis

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Understanding FDM

- Roles based – a user has one or more "roles" that determine what that user may do/see in FDM depending on the role selected
- Process Flows – Reports have an assigned process flow for data input and review
- Org Units – Ethics offices & POCs establish and structure "org units" in FDM and assign user roles for each org unit. Roles flow down to subordinate org units unless the role is assigned to another user at the subordinate org unit level.

Key FDM User Roles

- **DAEO/DAEO EC** – OGE 278 certifying authority.* A DAEO may have multiple DAEO ECs. Note this is the "FDM DAEO" not necessarily the legal agency "DAEO"

- **450 Certifier/EC** – OGE 450 certifying authority. A Certifier may have multiple ECs.
  - **450 Assistant** – assists Certifier in managing process/initial reviews.

- **SLC/SLC EC** – Senior Legal Counsel. Primarily serves to identify ethics counsel at subordinate legal offices who may have initial review and annual reporting responsibilities.
  - **SLC Assistant** – Assists SLC/SLC EC to manage process

> ** Note – The DAEO role(s) will remain, however, effective January 1, 2020, OGE 278 filing will migrate to OGE's Integrity filing system.*

Key FDM User Roles

- **POC –** organization point of contact (POC) for managing filing and org unit structure in FDM. Tracks and notifies ethics counsel regarding incoming/departing filers and supervisors. Ideally should be individual responsible for in/out processing in that organization.

- **Supervisor** – Filer's Supervisor. Need not be immediate/rater, just in chain of command. Use of 1st tier supervisors may create overly complex org structure, so 2nd or 3rd tier may be desirable

- **Filer** – Self-explanatory
  - **Filer Assistant** – optional; usually someone on filer's administrative support staff. May draft Filer's report; cannot eSign for Filer; cannot amend for Filer

Adding Users

- FDM identifies users by reference to the DISA Global Directory Service (GDS), https://dod411.gds.disa.mil/
- When adding or moving a user, FDM queries GDS and you select the user from the resultant list
  - If GDS has not been updated, FDM/GDS may identify the user by an old e-mail address (e.g., osd.mil or army.mil). Verify this is the correct person, just an old e-mail address, and then have the user login and update their e-mail address in FDM. Only the user can change their FDM e-mail address.
  - You may need to request the user send you a digitally signed e-mail to identify what e-mail address is associated with the user's CAC.

Address https://dod411.gds.disa.mil/ Go

DoD Global Directory Service
For Official Use Only

Last name | is | | First name | is |
Email address | is | | Where C/S/A is: | All DoD |
Download CRLs and CA Certificates | Search | Clear | Help | FAQ | GDS Home

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FDM Web Site – Home
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FDM Web Site Resources

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Help & Support

| Home | What is FDM | Learning Center | **Help & Support** | Agency Contact & Information |

FAQs ┆ Knowledge Center ┆ **Resources** ┆

Resources Page

General

- ❖ Rule: Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture, 5 C.F.R. Part 2634
- ❖ Extensions: Check your agency delegations to see who may grant extensions. See Extensions for general information on extensions including, combat zone and national emergency extensions. (Dec 2010)
- ❖ Glossary
- ❖ Useful Internet Resources for Reviewing Financial Disclosure Reports (from OGE) a collection of Internet sites for researching financial holdings when reviewing OGE 278s/OGE 450s.
- ❖ FDM Filer and Org Unit Registration Spreadsheet
  This spreadsheet is for legal office staff and organizational POCs to manage and organize filers for FDM registration. Legal office staff may find it helpful to distribute the spreadsheet so organization POCs can provide the required information on filers and their supervisors. Group filers in a named organization that corresponds to a specific reviewing supervisor. Instructions are included on the Instructions tab of the spreadsheet.
  Note: DoD Users Only: Use AKO email addresses for Army. For non-Army personnel you need the CAC-embedded email address. Often you can see that in a digitally signed email from them or in your local directory by checking email properties.
- ❖ Download Adobe Reader

  Get **ADOBE® READER®**

OGE 278
(OGE renamed the "SF" 278 to "OGE" Form 278 in December 2010. DAEOgram announcement: The DAEOgram includes an attachment listing the (mostly labeling) changes.

- ❖ OGE Form 278 (New blank form and instructions) (Dec 2011)
- ❖ OGE 278 Instructions only (Dec 2011)
- ❖ OGE's OGE Form 278 FAQs (OGE website)
- ❖ FDM 278 Common Questions & Answers

Navigating FDM

Report Tabs
Click to display the first page for the tab and any tab menu items

Menu Tabs
Click to display

User Profile

Progress Bar
Use to move to different report section

Instructions
Provide directions on how to enter data

DI

| My Reports | Assist Filers | My Reviews | My Expired Reports | Admin Center | Ethics Training | Management Reports | Resources |

| Remind Filers | Remind Supervisors | Review Reports | Manage Exceptions |

| Report Data | Attachments | Comments | Flags | Audit Trail | View/Print | Review Status | Compare | Previous Reports | Notes |

Draft - Danica Irvine, 2019 New Entrant OGE 450 Report

| Getting Started | Non-Investment Income | Assets | Liabilities | Outside Positions | Agreements | eSign |

View Asset and Investment Income

Reporting Period: 12 months preceding the submission of this Report* * If you had a National Emergency/Combat Zone Extension, consult your Ethics Official to determine the appropriate reporting period.

Asset Name:
(Limit 256 characters)

(256 Characters Remaining of 256)

Asset Type:
- ○ Stock, bond, option or security
- ● Sector mutual fund
- ○ Real Estate
  City:
  State: -SELECT-
  Country: -SELECT-
- ○ Privately held trade or business
  Description:
- ○ Life Insurance (not term)
  - ○ Whole
  - ○ Universal
  - ○ Variable
  - ○ Other
- ○ Annuity
- ○ Retirement Plan or Account (e.g., 401(k), IRA)
- ○ Pension Plan (Employer Name)
  Employer Name:
- ○ Trust
- ○ Other (Partnership, LLC, S Corp, etc.)
  Describe:

Asset Owner: (optional)
- ☑ Self ☐ Joint ☑ Spouse ☐ Dependent Child

Were you still holding this asset?
- ● Yes ○ No

Common Questions
- ◆ What are the instructions for this section?
- ◆ What are some common mistakes I should avoid?
- ◆ Do I have to report all assets that I owned during the reporting period and all investment income earned during this period?
- ◆ I owned stock in a company this year, but I sold it before the end of the year. When I sold it, the stock was worth $20,000, and it earned $1500 in capital gains. Because I no longer own it, do I still have to report the name of the company on the OGE Form 450?
- ◆ Do I have to report the value of the assets I report on the form or the amount of income that I or my spouse earns?
- ◆ Do I have to report IRAs?

how do I report it?
- ◆ I have only diversified mutual funds in my

Common Questions
Click to display

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Key Features - Filers

- Filers can prepare the report themselves or add an assistant who can draft it

- A report Q&A "wizard" & progress bar guides the Filer through with questions and tailored help

- Pre-population simplifies the filing:

  – Filers carry forward previous report data to their next reports

  – edit changes

- FDM flags incomplete items

- Filer eSigns the report securely online

- eMail notifications go to reviewers when Filer eSigns or amends

Key Features - Reviewers
(Supervisors and Ethics Counselors)

- e-Mail notices alert reviewers of report review readiness status
- Worklist view shows reports ready for review & tracks in-progress reports
- OGE reporting business rules applied to flagging issues requiring additional information or special attention
- Reviewers can add comments directly to a report
- Reviewer eSigns report securely online
- Audit trail records report status changes
- Compare view shows changes Filers make between reports saving Reviewers report reconciliation time

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Ethics Training

- Legal official roles may notify Filers & record Ethics Training for Filers
- Tabs:
  - Not Trained
  - Trained
  - Exceptions
- Use is optional; info in FDM will be available for SLC input to annual Agency report to OGE
- Print each year's Training Record *BEFORE* 31 Dec of that year!
  - Ethics Training | Trained
  - Ethics Training | Not Trained

Quick Reference: https://www.fdm.army.mil/documents/QRC_Manage_Ethics_Training.pdf