



GENERAL COUNSEL OF THE DEPARTMENT OF THE ARMY
104 ARMY PENTAGON
WASHINGTON DC 20310-0104



September 4, 2008

MEMORANDUM FOR DEPUTY DESIGNATED AGENCY ETHICS OFFICIALS

SUBJECT: Mandatory Use of Financial Disclosure Management for All OGE 450 Reports

1. As the Army Designated Agency Ethics Official, I direct that all Confidential Financial Disclosure Reports (OGE Form 450) due on or after January 1, 2009 within your organizations be electronically filed (eFiled) and reviewed using the Army's Financial Disclosure Management (FDM) system, <https://www.fdm.army.mil>. This means that all Annual OGE 450 reports covering calendar year 2008 and all New Entrant reports filed after January 1, 2009 will be eFiled in FDM. Please be sure to meet all applicable statutory labor relations obligations while implementing FDM.
2. The Army has successfully used FDM to eFile and manage SF 278 Public Financial Disclosure Reports since 2004. Over 9,100 Army OGE Form 450 filers eFiled their reports in FDM in 2008. Filer and reviewing official feedback was very positive – repeat users save time, errors are reduced, and report processing is improved and more efficient.
3. Migration to eFiling takes some planning and preparation because all filers and their supervisors must be registered in FDM by December 31, 2008. There are about 30,000 more Army personnel to register for the 2009 Annual filing season. The FDM 450 Tracking Spreadsheet aids the registration process. The FDM Program Director will arrange for timely registration of OGE 450 Filers provided the completed FDM 450 Tracking Spreadsheets are submitted by October 15, 2008. Please ensure that you submit your spreadsheets by that date if you desire the FDM Program Office to register filers and supervisors.
4. Transitioning to eFiling is an excellent time to evaluate whether the appropriate personnel are filing an OGE Form 450. I urge ethics counselors and supervisors to scrutinize their filer lists to ensure that only personnel who meet the requirements of 5 CFR 2634 Subpart I are directed to file the OGE Form 450.
5. I enclosed a memorandum addressed to Confidential Financial Disclosure Report Filers explaining the requirement to use FDM. Please distribute as needed.
6. POC: George Hancock, Program Director, FDM, Office of the General Counsel, 703-696-5512, email: geo-hancock@us.army.mil.

Benedict S. Cohen
Designated Agency Ethics Official

Enclosure



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September 4, 2008

MEMORANDUM FOR Confidential Financial Disclosure Report Filers (OGE Form 450)

SUBJECT: Use of Financial Disclosure Management to File Confidential Financial Disclosure Reports Due On or After January 1, 2009

1. As the Designated Agency Ethics Official responsible for the Army's Financial Disclosure Report and Review System, I am implementing an Army-wide requirement to use the Financial Disclosure management (FDM) on line system, <https://www.fdm.army.mil>, as the best method to implement this Secretary of the Army initiative. The requirement to electronically file (eFile) your Confidential Financial Disclosure Report(s) (OGE Form 450) will apply to all OGE Form 450 filings due on or after January 1, 2009.
2. Since 2005, when then Secretary of the Army Francis Harvey approved FDM development and implementation, we have continued to invest in and improve FDM. We successfully conducted evaluation pilot programs and a phased-in approach that demonstrated improved report accuracy and efficiency warranting Army-wide use. Filer and reviewing official feedback was very positive – repeat users save time, errors are reduced, and report processing is improved and more efficient. We also worked with Office of Government Ethics (OGE) officials who have formally approved FDM for Executive Branch-wide use. In addition to the Army, the Air Force and Navy have used FDM for several years. This past Spring the Veterans Affairs Department began using FDM.
3. Phase I applied to all Army SF 278 filers (General Officers and Senior Executive Service employees) who were required to use FDM beginning in April 2006. This year, during Phase II, over 9,100 Army OGE Form 450 filers used FDM to eFile their Reports. Army-wide use for all OGE Form 450s due beginning in 2009 marks the final transition to using FDM in the Army as the sole means for filing OGE Form 450.
4. Activities are reminded that they must meet all of their applicable statutory labor relations obligations regarding the implementation of the Army's FDM online system.
5. Direct questions about FDM to your local ethics counselor.

Benedict S. Cohen
Designated Agency Ethics Official