# **Financial Disclosure Management**

FDM Deployment Communications Timeline & Samples

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## **Communications Timeline**

During the life of any project, opportunities arise for one-time or event-driven communications. To gain the most advantage from your FDM communications, the FDM PMO recommends reviewing your agency's SOP with your Core Deployment team to help identify the best opportunities/events for sending communications to your end users.

Depending on where your agency is in the transformation process, many of the initial communications may have already been completed by your agency. The FDM PMO has provided a recommended communications timeline along with sample communications content that you can alter to fit your needs.

Time Period	Туре	Purpose	Audience	Key Message	Sample
1 JULY-1 OCT:	Announcement	To provide an announcement of FDM	All FDM Pilot Participants	Description and purpose of FDM Change in Financial Disclosure reporting policy Who will be involved Timeframe	FDM Announcement
NLT than OCT 1	Bulletin/Memo	Legal Personal Registration	Legal Community participants	Business Objectives of implementation Expected participation Include links to relevant training materials	Initial SLC and 450 Certifier
1 OCT – 31 DEC	Request for Information	Update POC, organization and filer lists	Supervisors and POCs	Prompt POCs and Supervisors to take action and prepare for upcoming release. Include	Initial e-mail to POC and Supervisor – Filer & Org Unit Setup
30 OCT - 31 DEC	Registration Message	Begin Filer registration and Org Unit Set up in FDM	POCs	spreadsheet Specific instructions on how to register filers and set up org units. Provide links to appropriate training materials	FDM POCs and Supervisors – Begin Data Setup in FDM
NLT 31 DEC	Heads up	Help Desk Briefing	Regional Help Desk	General awareness of impact on their help operations and their expected level of participation	Local Help Desk/Desktop Support
NLT 31 DEC	Reminder	Reminder of upcoming Filing Season	POCs	Remind POCs of filing season timeline Include instructions to monitor filing requirement completion	Send Initial Notification to Filers
NLT 31 DEC	Launch e-mail	Begin use of FDM	OGE 450 filers	Prepare filers for upcoming filing season using FDM	Initial e-mail to OGE 450 Filers

#### Recommended Timeline of Major Events

				Login Instructions	
				Provide links to appropriate training materials	
NLT 31 JAN	Reminder	Delinquency Notice to Filers	Filers	Remind filers of the requirement to in FDM.	Reminder e-mail to Delinquent Filers
				Include filing deadlines and process for requesting extensions	
NLT 31 JAN	Reminder	Delinquency notice to supervisors	Supervisors	Reminder notice of their obligation to review their filer's reports in FDM.	Reminder E-mail to Supervisors to Begin Review
				Include filing deadlines	
NLT 15 FEB	Launch e-mail	Begin use of FDM	OGE 278 Filers and POCs	Prepare filers for upcoming filing season using FDM	
				Login Instructions	
				Provide links to appropriate training materials	

## **FDM Sample Communications**

#### ACTION ITEM

When sending notifications from FDM, be sure NOT to use special characters such as <,> =, &, :, ```` in your message. Italicized items in brackets indicate areas where local revisions of the message need to occur.

#### **FDM Announcement**

SUBJECT: Welcome to FDM – Electronic Financial Disclosure Filing

Welcome to FDM. The Financial Disclosure Management (FDM) software system helps Filers accurately prepare and electronically file a financial disclosure Report. It is a secure, online application accessed at **https://www.fdm.army.mil** that simplifies financial disclosure report preparation and review, saving time and eliminating common errors.

You have been selected to participate in the electronic financial disclosure pilot project. Filing of your {OGE 450} {OGE 278} form must be done electronically. You will use the Financial Disclosure Management (FDM) system, a web-based electronic filing system to prepare and file your financial disclosure report.

Given the sensitive nature of information entered into FDM, some users may be concerned about the security of their information. FDM uses a secure Internet connection to guarantee that the transmission of data from the server to you is secure.

You will be notified in the near future as to when to begin accessing FDM to complete your disclosure form.

Browse the FDM web site, <u>https://www.fdm.army.mil</u>, especially the Learning Center and the Help & Support tabs, just to see what is available for later use.

The FDM Learning Center, <u>https://www.fdm.army.mil/learningCenter/learningCenter.htm</u>, includes short video tutorials and topical Quick Reference Cards (QRCs).

FDM 450 will be ready to use for the start of the {YEAR} filing season. The filing season starts on 1 January {YEAR} and ends on 15 February {YEAR}.

### Sample Initial e-mail to SLCs and Certifiers

SUBJECT: Use of FDM - Set up Your Ethics Counselors and POCs

The {AGENCY NAME} is now connected to the Financial Disclosure Management system (FDM). Please take this opportunity to start looking at and using the system.

Your duties in FDM are similar to how you manage disclosure-reviewing activities today, except now you can manage them in FDM.

Log on at your earliest convenience to check and update the following information. See attached instructions.

CONTACT INFORMATION – make sure your personal contact information is correct. Click MY INFO | CONTACT INFO.

ETHICS COUNSELORS - Designate your Ethics Counselors so this staff will be able to assist you during the disclosure review process using FDM.

- A. Click MY INFO |MY ECs and add your ECs.
- B. Search by First/Last name—remember to select "{Agency Name}" under Agency Directories.
- C. Select correct entry and then confirm selection.

POCS AND ORG UNITS – You will need to identify and input your higher-level organizational POCs who manage 450 filers and prepare to register them in FDM. Your Org Units are simply an electronic version of your agency organization structure with required information regarding each organization – including a Supervisor, POC, SLC, and 450 Certifier.

- A. Click Admin | POCs.
- B. Click Add New POC and New OrgUnit
- C. Search by First/Last name—remember to select "{Agency Name}" under Agency Directories.
- D. Select correct entry and then confirm selection.
- E. Type the appropriate Org Name and Description and then click Save.

TIP! Use abbreviated name of the Directorate/Division/Branch/Section or the supervisor's position/title or the office symbol for the Org Unit Name.

Once the initial org unit and POC data is entered, the POC, or ethics officials for those agencies without POCs, can create sub-Org Units until a complete organizational structure has been established.

IMPORTANT! Automatic e-mails are sent to ECs and POCS as they are added to FDM

If you have technical questions concerning FDM access, registration, or navigation, you should contact the FDM Service Center (FDM Help Desk) at (732) 720-6454 or DSN 848-8679.

#### Sample Initial e-mail to Point of Contact for FDM – Filer and Org Unit Setup

SUBJECT: FDM – Electronic Financial Disclosure Filer Set Up

You have been identified as a Point of Contact for Financial Disclosure Management (FDM) system by your organization.

Your duties in FDM are similar to how you manage filers and reporting activities today, except now you can manage them in FDM. As an FDM POC, you are primarily responsible for loading Filer and Org Unit data into FDM and then keeping filers and supervisors aware of the filing season and deadline

To assist you in organizing the 450 filers you support, use the attached registration spreadsheet. This spreadsheet is a tool for organizational POCs to manage 450 filers and prepare to register them in FDM. Filers should be grouped by named organization that corresponds to a specific reviewing supervisor. A supervisor may have one or more 450 filers.

Please begin filling out the attached Filer spreadsheet NLT {*MONTH DAY, YEAR*}. Once your spreadsheets are completed, you can begin entering your filer and organization information into FDM. A separate e-mail will be sent out with instructions.

IMPORTANT! Automatic e-mails are sent to Filers as they are added to FDM.

FDM RESOURCES: You can browse the FDM web site to see what is available for later use. There are instructions and resources for filers, POCs and reviewers available in the FDM Learning Center <a href="https://www.fdm.army.mil/learningCenter/learningCenter.htm">https://www.fdm.army.mil/learningCenter/learningCenter.htm</a>. Also included here are instructions that you may find helpful in setting up your Filer and Org Unit data in FDM.

Please email me or call me with your questions and I will be more than happy to help you. Thanks very much for your cooperation.

If you have technical questions concerning FDM, contact the FDM Help Desk at (732) 720-6454 or DSN 848-8679.

If you are not the appropriate person, please provide me with an alternate name or replacement name as soon as possible.

#### Sample Initial e-mail to FDM POCs and Supervisors – Begin Data Setup in FDM

SUBJECT: Begin Data Setup (Enter OGE 450 Filers and Org Units) in FDM

The {YEAR} OGE 450 filing season will begin shortly. All filers will use the online Financial Disclosure Management (FDM) program to file their OGE 450 NLT 15 February 2008.

The data set up, e.g., Filers and Org Units can only be added to the system by a Supervisor or Organization Point of Contact. Managers/Supervisors should review the spreadsheet you previously created and make the final determination regarding who of their employees meet the OGE criteria, and are required to file. Once finalized, you FDM Point of Contact (POC) should begin the data setup in FDM.

Please login to FDM https://www.fdm.army.mil/ to begin setting up your Filers.

The overall {AGENCY} POC is {AGENCY POC NAME}, {AGENCY POC PHONE AND/OR E-MAIL}, is available if you have questions.

REMINDER: Org Units are simply an electronic version of your agency organization structure. Filers should be grouped by the named organization that corresponds to a specific reviewing supervisor. A supervisor may have one or more 450 filers. To add your filers and org units, follow these steps:

#### ADD ORG UNITS

- Log onto FDM at <u>https://www.fdm.army.mil;</u>
- Click the Admin Tab
- Click the Org Unit tab
- Under Org Unit, select the organization you want to add your org unit
- Click Add New Org Unit button
- Type the Org Unit Name and Description
- Click Save.

#### ADD OGE 450 FILERS

- Click on the Admin Tab;
- Click on the Filers Tab;
- Under Org Unit, click on the organization in which you want to add the filer(s)
- Click Add Multiple OGE 450 Filers button
- Type or copy and paste the e-mail address from your spreadsheet into the E-mail Address box.
- Click Search and then Confirm.

FDM POC Basic User Guide: <u>https://www.fdm.army.mil/documents/FDM POC Basic User Guide.pdf</u> FDM POC Basic User Guide Tutorial

https://www.fdm.army.mil/documents/POC Basic User Guide Tutorial for Website/POC Basic User Guide

## Sample e-mail to Local Help Desk/Desktop Support

SUBJECT: Financial Disclosure Management (FDM) Support Information

The Financial Disclosure Management (FDM) software program is due to go live on {*MONTH DAY, YEAR*}. {*NUMBER OF FDM USERS*} users are expected to begin using FDM and will complete their work within the next 8 weeks.

FDM users have been instructed to contact their local PC support help desk to address any technical problems they may have such as meeting FDM's minimum system requirements, assistance with their browser, etc. You can go to the FDM Help & Support page

<u>https://www.fdm.army.mil/helpSupport/helpSupport.htm</u> for more information.

The FDM Help Desk is available for all other FDM related questions or concerns.

#### Sample E-mail to FDM POCs – Please send Initial Notification to Filers

SUBJECT: Please send Initial Notification to Filer

The {YEAR} OGE 450 filing season has begun. All filers will use the online Financial Disclosure Management (FDM) program to file their OGE 450 NLT 15 February {YEAR}.

FDM will be used to assign and track filing completion. Annual reports must be completed by February 15.

Please login to FDM https://www.fdm.army.mil/ to begin reminding your Filers of their {OGE 450 ANNUAL} requirement to file.

To do so:

- 1. Log in to FDM at <a href="https://www.fdm.army.mil">https://www.fdm.army.mil</a>
- 2. Go to the My Reviews tab and then the Remind Filers sub-tab.

3. In the "Org Unit" section – Select Show My Filers and Include Filers for org units assigned to other POCs.

4. In the "Find" section -- Select the top radio button for "OGE 450 Annual Filers who need an Initial Notification to file"

5. On the next screen, you will be able to customize email messages to your filers and supervisors.

Please call the help desk for assistance in using FDM.

## Sample Initial e-mail to FDM OGE 450 Filers

SUBJECT: Use of FDM 450 for the {YEAR} OGE Form 450 Filing Season

The {YEAR} OGE 450 filing season has officially begun. All [Office name]'s electronic financial disclosure pilot filers will use Financial Disclosure Management (FDM) to file their OGE 450. The Office of Government Ethics (OGE) criteria regarding who is required to file remains unchanged from last year. As such, a person is required to file if:

his/her duties and responsibilities require him/her to participate personally and substantially, AND WITHOUT SUBSTANTIAL SUPERVISION AND REVIEW, in taking government action regarding:

- contracting or procurement;

- Regulating or auditing a non-federal entity;

- Or if activities in which the final decision will have a direct and substantial impact on the interests of any non-federal entity;

REGISTRATION: You are now registered in FDM (<u>https://www.fdm.army.mil</u>), as a Confidential Financial Disclosure Report Filer.

DUE DATE: Your (Year) Annual Report covering (YEAR) is due no later than February 15, {YEAR}.

FDM RESOURCES: You will receive a separate message with login instructions. You can browse the FDM web site, <u>https://www.fdm.army.mil</u>, especially the Learning Center and the Help & Support tabs, just to see what is available for later use.

QUESTIONS. Please consult your organization's POC or [Office name]'s Legal Office if you have questions about this requirement to file a Financial Disclosure Report, or need an extension.

The FDM Learning Center, <u>https://www.fdm.army.mil/learningCenter/learning Center.htm</u> has short tutorials and Quick Reference Cards for a quick introduction to FDM.

FDM Help Desk: (732) 532-5566, DSN 992-5566 from 7:00 AM to 5:00 PM Eastern Time. Voice mail available for other times. E-mail: mailto:MONM-SECFDMSpt@conus.army.mil.

#### Sample Reminder e-mail to Delinquent Filers

Subject: Late Annual OGE Form 450

1. Your ANNUAL OGE Form 450 is late. Please login to FDM, <u>https://www.fdm.army.mil</u>, to complete your report today.

Once you log in to FDM, click My Reports and then click Start this Report.

When you report is complete you can check the review status at any time on the My Reports | Reports List page.

DUE DATE: The annual OGE Form 450 was due 15 February [or later date if prior extension expired].

Failure to file by [date] will result in a delinquency report to your Supervisor with a request for disciplinary action.

The FDM Learning Center, <u>https://www.fdm.army.mil/learningCenter/learning Center.htm</u> has short tutorials and Quick Reference Cards for a quick introduction to FDM.

#### Sample Reminder e-mail to Supervisors to begin their Review in FDM

SUBJECT: OGE 450 Ready for Your Review Online - Supervisory Review Notice

FDM shows that [Filer name] has an OGE Form 450 that you have not reviewed.

To begin your review, please login to FDM, <u>https://www.fdm.army.mil/FDM</u>, - Click the Review Reports tab.

- Type the Filer's Name in this e-mail in the Search fields.
- Click Search
- Click View beside the Filer's report.

The FDM Learning Center has several resources you may find helpful: Reviewing an OGE 450 Report in FDM

https://www.fdm.army.mil/documents/Reviewing OGE 450 Report For Website/Reviewing an OGE 45 <u>0 Report.html</u> and a Quick Reference Card

https://www.fdm.army.mil/documents/Reviewing\_OGE\_450\_Report\_For\_Website/Reviewing\_an\_OGE\_450\_Report.html

#### Sample Initial e-mail to FDM OGE 278 Filers and Reviewers

SUBJECT: Use Financial Disclosure Management (FDM) for OGE 278 Public Financial Disclosure Report, Preparation and Electronic Filing

Annually by 15 May, Presidential Appointees, active duty General Officers, reserve General Officers who served over 60 days active duty during {YEAR}, and Senior Executive Service personnel must complete an Annual Post-Government Employment Restrictions Notification and Acknowledgement and Standard Form (OGE) 278, Public Financial Disclosure Report.

The {AGENCY NAME} is now connected to the Financial Disclosure Management system (FDM). It is a secure, online application accessed at **https://www.fdm.army.mil** that simplifies financial disclosure report preparation and review, saving time and eliminating common errors.

In addition, report reviewers and ethics officials will use FDM's online review and approval features to complete electronic processing of the report.

If you are not already registered, please ask your legal advisor to register you.

The FDM Learning Center has several resources you may find helpful: Filing a OGE 278 Report in FDM <u>https://www.fdm.army.mil/documents/FDM 278 Filing for Website/Filing a OGE 278 Main Menu.html</u> and a Quick Reference Card <u>https://www.fdm.army.mil/documents/FDM 278 Filing for Website/Filing a OGE 278 Main Menu.html</u>

Reviewing a OGE 278 in FDM <u>https://www.fdm.army.mil/documents/FDM\_Reviewing\_A\_OGE278\_For\_Website/Reviewing\_a\_OGE\_278</u> <u>Main\_Menu.html</u> and a Quick Reference Card <u>https://www.fdm.army.mil/documents/FDM\_278\_Filing\_for\_Website/Filing\_a\_OGE\_278\_Main\_Menu.html</u>

### Sample Initial e-mail to FDM OGE 278 Filers

SUBJECT: Use of FDM 278 for the {YEAR} OGE 278 Filing Season

The {YEAR} OGE 278 filing season has officially begun. All [Office name]'s electronic financial disclosure pilot filers will use Financial Disclosure Management (FDM) to file your OGE 278 form.

REGISTRATION: You are now registered in FDM (<u>https://www.fdm.army.mil</u>), as a OGE 278 Filer.

DUE DATE: Your (Year) Incumbent Report covering (YEAR) is due no later than May 15, {YEAR}.

FDM RESOURCES: You will receive a separate message with login instructions. You can browse the FDM web site, <u>https://www.fdm.army.mil</u>, especially the Learning Center and the Help & Support tabs, just to see what is available for later use.

QUESTIONS: Please consult your legal advisor or [Office name]'s Legal Office if you have questions about this requirement to file a Financial Disclosure Report, or need an extension.

The FDM Learning Center, <u>https://www.fdm.army.mil/learningCenter/learning Center.htm</u> has short tutorials and Quick Reference Cards for a quick introduction to FDM.

## Sample Reminder e-mail to FDM POCs of Upcoming Filing Season (2<sup>nd</sup> season)

The {YEAR} OGE 450 filing season has begun. All Filers will electronically file using the Financial Disclosure Management system (<u>www.fdm.army.mil</u>). OGE 450 reports are due no later than February 15, {YEAR}

You have been designated as a POC for your organization and it is your responsibility to pass this information along to all those who need it within your organization.

{Anyone who filed an OGE Form 450 last year will be in FDM and can file their form immediately. However, as the POC, it is your responsibility to make the necessary corrections to the org units and filer lists in FDM. Supervisors should be able to help you identify employees who are required to file and OGE 450.}

To ensure consistency, review the list of last year's filers and update to reflect both employees no longer working for you, and new employees who fit the filing criteria. Having said that, Managers/Supervisors should review that list, and make the final determination regarding who of their employees meet the OGE criteria, and are required to file.

There are instructions and resources for POCs on FDM

https://www.fdm.army.mil/learningCenter/learningCenter.htm. Also included here are instructions that you may find helpful in setting up your Filer and Org Unit data in FDM.

Please email me or call me with your questions and I will be more than happy to help you. Thanks very much for your cooperation.

If you have technical questions concerning FDM, contact the FDM Help Desk: (732) 720-6454 or DSN 848-8679. This office is staffed during regular business hours, Eastern Time. Voice mail available for other times. E-mail: mailto:USARMY.APG.CECOM.MBX.FDMSPT@mail.mil.

## Sample e-mail to FDM OGE 450 Filers (2<sup>nd</sup> season)

SUBJECT: Use of FDM 450 for the {YEAR} OGE Form 450 Filing Season

It is time to file your {YEAR} OGE 450. Please file through the Financial Disclosure Management system (<u>www.fdm.army.mil</u>).

Once you log in to FDM, click My Reports and then click Start this Report.

When you report is complete you can check the review status at any time on the My Reports | Reports List page.

Please consult your legal advisor or me, {POC Name, Phone, e-mail}, if you have questions about this requirement to file a Financial Disclosure Report, or need an extension. Also, consult your POC and/or legal advisor if you do not think you should file such a report.

All reports filed last year via FDM have been pre-loaded into FDM, and filers can easily pre-populate their {YEAR} reports with data from last year's reports. This makes filing much easier and quicker this year.

Your main points of contact for this action should be your organization POCs. If you have questions about how to file your report, please have them contact the FDM Help Desk at (732) 532-5566. There are also helpful step-by-step instructions on Quick Reference Cards found under the "Learning Center" tab on the first page of the FDM site.

#### Sample e-mail to FDM OGE 450 Supervisors or Ethics Counselors (2<sup>nd</sup> season)

To All,

FDM will be ready to use for the {YEAR} OGE 450 filing season. All filers will use the Financial Disclosure Management (FDM) program to file their OGE 450 NLT 15 February {YEAR}.

You will need to identify your organizational POCs to manage 450 filers and prepare to register them in FDM. Instructions are located on the FDM Learning Center. Filers should be placed in organizations that correspond to a specific reviewing supervisor. A supervisor may have one or more 450 filers.

At the same time, you will need to identify who in your office will certify OGE 450s for each organization you support.

FDM 450 can be accessed at this website:

#### https://www.fdm.army.mil/

Supervisors will receive automated e-mails when a report is ready. Please urge your supervisors to check for pending reports periodically.

If filers have questions about how to file their reports, or supervisors need assistance reviewing their subordinates' reports, please have them contact the FDM Help Desk at (732) 532-5566. There are also helpful step-by-step instructions on Quick Reference Cards found under the "Learning Center" tab on the first page of the FDM site.

For legal questions concerning the OGE Form 450, please contact an Ethics Counselor in your higher headquarters.