

MANAGING ETHICS TRAINING



Any individual who is required to file a Financial Disclosure Report is required to attend Ethics Training once a year. FDM provides an "Ethics Training" tab for Ethics Counselors to notify Filers about ethics training and to record who attended training. Ethics Counselors who record all Filer training in FDM may generate reports to prepare that portion of the annual agency report to OGE.

Note: Ethics training must be recorded in the year presented, i.e., ethics training completed in 2010 must be recorded in FDM on the Ethics Training tab NLT 31 Dec 2010.

TYPE OF ETHICS TRAINING

There are two types of ethics training:

- ♦ **Initial Training** -- All Filers who are required to file an OGE 450 or OGE 278 New Entrant Report are to receive initial ethics training within 90 days after entering a covered position in a new agency.
- ♦ **Annual Training** -- All personnel required to file the OGE 278 or an OGE Form 450 must receive annual ethics training.

TRAINING RECORDERS

The following roles in FDM can record and report ethics training:

- ♦ DAEO or DAEO EC
- ♦ Agency Administrator
- ♦ SLC, SLC EC or SLC Assistants
- ♦ 450 Certifier, 450 Certifier EC or 450 Certifier Assistant (for 450 Filers only)
- ♦ POCs (for 450 Filers only)

Note: A training recorder may create, view or update a Filer's training record only for Filers within their organization.

NOT TRAINED

Ethics Training Notification to Filers

To notify Filers of their requirement to attend ethics training:

1. In FDM, select **Ethics Training | Not Trained**.
2. On the breadcrumb trail, select the Org Unit of the Filers you wish to notify, or select **Show My Filers /Include Filers for Org Units assigned to other.....** to display a list of all Filers.
3. Click on the checkboxes next to the Filers you wish to notify.
4. Click on the **Notify Filers** button. The Notify Filers screen is displayed.

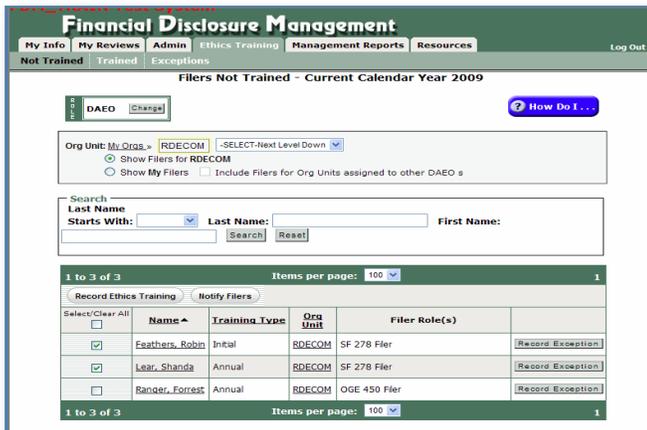
The screenshot shows the 'Filers Not Trained - Current Calendar Year 2009' screen. It includes a search section with fields for 'Last Name', 'Starts With', and 'First Name'. Below the search is a table with the following data:

Name	Training Type	Org Unit	Filer Role(s)	Record Exception
<input checked="" type="checkbox"/> Feathers, Robin	Initial	RDECOM	SF 278 Filer	<input type="button" value="Record Exception"/>
<input checked="" type="checkbox"/> Lear, Shanda	Annual	RDECOM	SF 278 Filer	<input type="button" value="Record Exception"/>
<input type="checkbox"/> Ranger, Forrest	Annual	RDECOM	OGE 450 Filer	<input type="button" value="Record Exception"/>
<input type="checkbox"/> West, Easton	Annual	RDECOM	SF 278 Filer	<input type="button" value="Record Exception"/>



5. Enter a Subject in the **Subject** field and type a message in the **Message** field.
6. When all information is entered, click on the Notify button. An e-mail message is sent to all selected Filers of their requirement to attend annual Ethics Training.

NOTE: You can only advise multiple Filers for annual training.



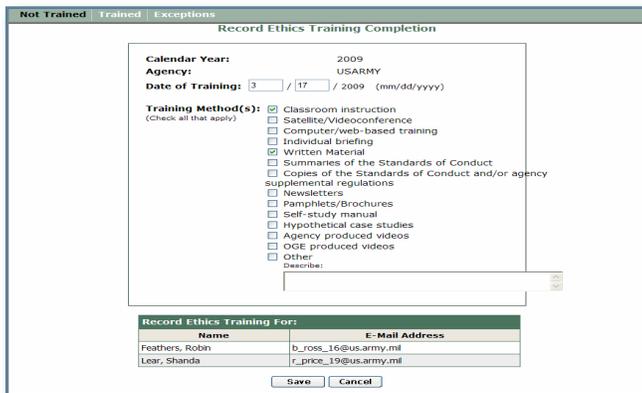
Record Ethics Training

When Ethics Training is complete record on the Ethics Training tab. Ethics training must be recorded in the year presented, i.e., ethics training completed in 2010 must be recorded in FDM NLT 31 Dec 2010.

1. Select the **Ethics Training / Not Trained** tabs.
2. Click on the checkbox next to each Filer who has received training.

NOTE: In order to enter a group of Filers at one time, training would have to be Annual training occurring on the same day, and using the same training method type. Initial training has to be entered for one Filer at a time.

3. Click on the **Record Ethics Training** button. The Record Ethics Training Completion screen is displayed.
4. Enter the date of training.
5. Select the method of training (more than one checkbox can be selected).
6. When complete, click on **Save**. You return to the Not Trained screen and the Filers' names are removed from this screen and display on the Trained screen.



TRAINED



View or Change a Training Record

Once you have recorded training for your Filers, you can view, edit or remove a training record on a Filer.

To view or change a training record:

1. Select the **Ethics Training / Trained** tab. The Filers Trained page is displayed.
2. Locate the Filer on the list and click on the View/Edit button located next to the Filer's name. The Filers Trained page is displayed. You can change the date, the training type and method of training.
3. When complete, click on **Save**.

The screenshot shows the 'Files Trained - Current Calendar Year 2009' page in the FDM TRAIN Test System. A dialog box is open, asking for confirmation to remove an ethics training record for the selected filer(s). The dialog box text reads: "You are about to remove Ethics Training record for the selected Filer(s). Click 'OK' to confirm removal or 'Cancel' to cancel this action." The background shows a table with columns for Name, Training Type, Org Unit, and Filer Role(s). One row is visible for "Hammer, Armand" with "Annual" training type, "CERDEC ASD" org unit, and "SF 278 Filer" role.

Remove a Training Record

To remove a training record:

1. Select the **Ethics Training / Trained** tabs.
2. Click on the checkbox next to the Filer whose training record you wish to remove (more than one can be selected at a time).
3. Click on the **Remove Ethics Training** button. A message displays confirming that you wish to remove this training record.
4. Click **OK**. The Filer's name is removed from the Trained List and returned to the Not Trained List.

TRAINING EXCEPTIONS

An exception to annual or initial Ethics Training is extremely rare. However, there are instances where training in a particular year may be waived. As shown above, the exception is recorded from the Not Trained page, and all exceptions recorded are displayed on the Exceptions page.

Record an Exception to Ethics Training

It is extremely rare for a Filer to be excused from ethics training since this training can be delivered in many different ways. However, there are some circumstances where a Filer's requirement to receive ethics training can be waived:

Exceptions for OGE 278 Filers:

- Verbal training without a qualified instructor available or written training prepared by a qualified instructor will satisfy the verbal training requirement for a public filer (or group of public filers) if one hour of official duty time is provided for the training; and
- The designated agency ethics official (or his or her designee) makes a written determination that it would be impractical to provide verbal training with a qualified instructor available; or
- The employee is a special Government employee.

Exceptions for OGE 450 Filers:

- Written ethics training prepared by a qualified instructor will satisfy the verbal training requirement for a covered employee (or group of covered employees) if sufficient official duty time is provided for the training; and
- The designated agency ethics official (or his or her designee) makes a written determination that verbal training would be impractical;
- The employee is a special Government employee expected to work 60 or fewer days in a calendar year; or
- The employee is an officer in the uniformed services serving on active duty for 30 or fewer consecutive days.

NOTE: For more information for OGE 278 Filers, click on the following link:
http://edocket.access.gpo.gov/cfr_2002/janqtr/5cfr2638.704.htm

NOTE: For more information for OGE 450 Filers, click on the following link:
http://edocket.access.gpo.gov/cfr_2002/janqtr/5cfr2638.705.htm

To record an exception:

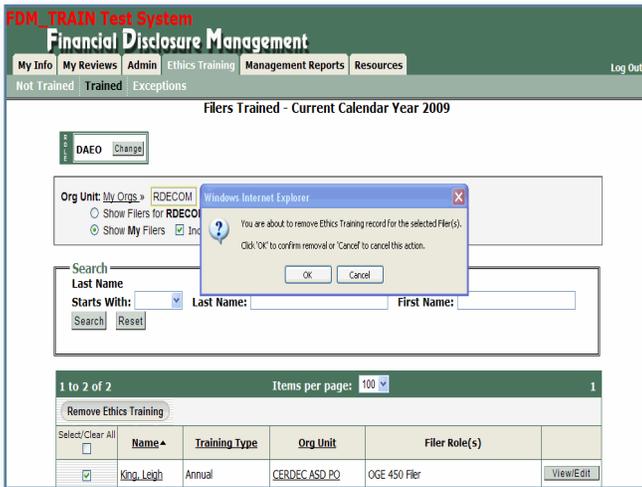
1. Select the **Ethics Training / Not Trained** tabs. A message displays citing the links giving more detailed information regarding exceptions.
2. Click on the checkbox next to the Filer's name to which an exception will be issued.
3. Click on the **Record Exception** button next to the Filer's line item. The Record Ethics Training Exception screen is displayed.
4. Select the radio button next to the type of training the Filer was to receive.
5. Enter a reason for the exception in the **Reason for Exception** text box.
6. Click on **Save**. You return to the Not Trained screen and the Filer who received the exception is removed from this list and now displays on the Exception List.



Remove an Exception to Training

To remove an exception to training:

1. Select the **Ethics Training / Exceptions** tabs. The Exceptions page is displayed.
2. Click on the checkbox next to the Filer whose exception you wish to remove (more than one can be selected at a time).
3. Click on the **Remove Exception** button. A message displays confirming that you wish to remove the exception from this Filer.
4. Click **OK**. The exception is removed and the Filer is moved back to the Not Trained page.



Change or View an Exception

1. Select the **Ethics Training / Exception** tabs.
2. Locate the Filer whose record you wish to view/change, then click on the **View/Edit** button located next to the Filer's name.
3. You can change the **Reason for Exception**.
4. If changes were made, click on the **Save** button. You return to the Exceptions page and any changes made are saved.

