

REVIEWING AN OGE 278 REPORT



The review process begins in FDM when the reviewer receives an automated e-mail message indicating that they can begin their review process. In the Department of Defense (DoD), the Joint Ethics Regulation (JER) 7-206 requires Supervisors review 278s (except for Termination reports). Non-DoD agencies using FDM need not use the Supervisor role in FDM 278.

This QRC highlights select reviewer features in FDM. Supervisors use FDM to review financial disclosure reports online checking the reported financial interests for completeness, to identify any financial interests that may conflict with the Filer's official duties, and that the report is administratively accurate and complete. FDM's Compare feature highlights changes when a filer prepopulated the current report from a prior one in FDM. In addition, reviewers can check that a report is administratively accurate and complete. The "Flags" tool helps prevent many common mistakes before the Filer submits his/her report saving time for the Filer and reviewers.

Normally the Filer or another reviewer will cause FDM to e-mail a notice that an 278 is ready to review. That e-mail should contain instructions to login to FDM, <https://www.fdm.army.mil>, and go to the **My Reviews | Review Reports** tab, **Worklist** View. There, either change or accept the default settings and click on **Search** to see all reports ready for your action in any of your FDM role(s).

LOCATING 278 REPORTS TO REVIEW

FDM has two Reports List views Org Unit and Worklist. The Worklist is the default view for all FDM reviewers. OrgUnit View Mode lists disclosures by Org Unit. Most reviewers will use FDM's Worklist to see which reports are ready for review.

1. Click the **My Reports | Review Reports** tab.

Using the Worklist

2. In the Search area select the following and click **Search**.
 - ROLE - Supervisor, SLC or DAEO
 - FORM TYPE - 278
 - YEAR - the report year
 - REPORTING STATUS- All
 - REVIEW STATUS - Under Review
 - ACTION - eSign

Note: The Action setting narrows the display to only reports ready/available for your eSign action.

Continue to the Reviewing a Report section.

Assigned	Filer	Org Unit	Supervisor	Form Type	Year	Reporting Status	Review Status	Days In Review	My Review/Signature Date	
Yes	278Filer3_CIO X	CIO	SupervisorPOC, Public X	SF278	2010	Incumbent	Complete	0	10/05/2010	View
No	278Filer4_CIO X	CIO	SupervisorPOC, Public X	SF278	2010	New Entrant	Under Review	1		View, Assign, eSign, End Initial Review
Yes	278Filer5_Demo	Director Demo	SupervisorPOC, Public X	SF278	2010	Incumbent	Under Review	1		View, Remove Assignment, eSign, End Initial Review

Using Org Unit View

Use the Org Unit view to list reports by Filer Org Unit.

1. On the Review Reports page, click **Org Unit View**.
2. Check the Role box and ensure you are in the appropriate role, i.e., Supervisor, SLC, or DAEO.
3. Select the Org Unit from the Next Level Down drop-down list.
4. Select **Show My Filer's Reports** to see a listing of all of the reports you are responsible for reviewing.
5. Under the Search area, select the following and click **Search**.
 - FORM TYPE - 278
 - YEAR - The report year
 - REPORTING STATUS - All
 - REVIEW STATUS - All

Assigned	Filer	Org Unit	Supervisor	Form Type	Year	Reporting Status	Review Status	Days In Review	My Review/Signature Date	
Yes	278Filer1_OGC	OGC	SupervisorPOC, Public X	SF278	2010	Incumbent	Not Started			View, Remove Assignment
Yes	278Filer2_OGC	OGC	SupervisorPOC, Public X	SF278	2010	Incumbent	Draft			View, Remove Assignment
Yes	278Filer3_CIO X	CIO	SupervisorPOC, Public X	SF278	2010	Incumbent	Complete	0	10/05/2010	View
No	278Filer4_CIO X	CIO	SupervisorPOC, Public X	SF278	2010	New Entrant	Under Review	1		View, Assign
Yes	278Filer5_CIO X	CIO	SupervisorPOC, Public X	SF278	2010	Incumbent	Not Started			View, Remove Assignment

REVIEWING A REPORT

Depending upon the filtering criteria you select, all reports that have been signed and submitted by your assigned filers are displayed.

Reviewing Options

- Use **End Initial Review** to signify that you have conducted an initial review of a financial disclosure report.
- Use **eSign** when you have completed your review and are confident there are no conflicts of interest.
- **View** allows you to review the financial disclosure report online.
- **Submit to DAEO** - The Submit to DAEO button does not display until a FDM Supervisor and Senior Legal Counsel reviews and eSigns an OGE278. A DAEO or DAEO EC will not be able to eSign and complete a disclosure report until it has been submitted to DAEO. However, a DAEO or DAEO EC can "pull" a report forward for their review if necessary by clicking Submit to DAEO button when necessary.
- **Assign/Remove Assignment** - A reviewer has the ability to assign a report that has been started/submitted or remove a report assignment.

1. Click **View** beside the appropriate report. The Getting Organized page is displayed for the 278 report you are reviewing.

The screenshot shows the 'Financial Disclosure Management' interface. The main heading is 'Under Review - Marty Graw, 2009 Incumbent SF 278 Report'. Below this, there is a 'Red Flags' section with a table of transactions and a list of flags.

Asset Name	Type of Asset	Owner	Type of Transaction	Date	Amount	Divest
Beach Rental, Long Beach Island, NJ, USA	Real Estate	Joint	Purchase			
Charlotte Russe Holding	Stock, Bond, Option, or Security	Joint	Sale			

Flags:

- ♦ The Date of the transaction is required when reporting a single transaction.
- ♦ An Amount is required when reporting a transaction.
- ♦ The Date of the transaction is required when reporting a single transaction.
- ♦ An Amount is required when reporting a transaction.

Gifts:

- ♦ The Gifts section of the report must be filled out by filers with Incumbent reporting status.

Reviewing Report Flags

Review any report flags to be sure all errors and omissions are addressed. A red flag indicates required information is missing and that it should be provided before the report is submitted. A yellow flag indicates that information is missing but is not required in order to submit a report.

2. Click **Flags**.
3. Review the report's flags. When complete, click either **Report Data** to return to the details of the OGE 278 you are reviewing or **View/Print** to view and print the financial disclosure report form.

Comparing Reports

Reviewers can easily compare changes/differences between a prior report and the current report. The Compare feature is only available if the Filer prepopulated from a previous report.

4. Click **Compare**.
5. Review the report changes.
6. Click **Report Data** and then **eSign** to eSign the report.

Note: FDM reviewers (i.e., supplemental or additional) can request a copy of a Filer's previous report for comparison. To request a copy of a Filer's previous reports, click the **Previous Reports** tab and then click **Request a Copy**. E-mail requests are automatically sent to the Filer's current organizational legal reviewers.

The screenshot shows the 'Financial Disclosure Management' interface with the 'Compare' feature active. The main heading is 'Under Review - Marty Graw, 2009 Incumbent SF 278 Report Disclosure Report Comparison'.

Compare-to Report: Complete 2008 Incumbent
Comparison Date: February 26, 2009 16:49:39

Change Summary	Changed	Added	Deleted	Unchanged
Assets	0	1	1	1
Other Income	0	0	0	3
Liabilities	0	1	0	2
Agreements	0	0	0	1
Positions	0	0	0	1

Current to Previous Disclosure Totals	Current Disclosure Report	Previous Disclosure Report
Transactions		
Gifts	0	2
Compensations	-	-

Legend: & strike-through = Change & faded text = Delete & blue text = Added

Report Data

Reviewers may click Continue and advance through the OGE 278 section by section if desired. The advantage of this approach is that you may add an individual comment to a specific item.

7. Select the appropriate report data sections and make any necessary comments.

Comments

Comments can be added to specific line items or to the 278 report overall as substantive or non-substantive comments. A comment should be included as part of the 278 of record, if it is a substantive comment that provides additional information, a clarification, or a correction that materially affects the data reported on the 278.

Comments and attachments can also be added to a report after the report is complete (see Supplemental section.)

Adding a Line Item Comment

8. Click **Add Comment** beside the appropriate line item.
9. Review any existing reviewer or filer comments.

Note: Only select, **Include as part of the OGE 278 of Record** if you want to include this comment publicly with the financial disclosure report.

10. Type your comment and click **Save**.

Adding a Report Comment

11. Click **Comments** in the Review Reports submenu. The Comments page displays.
12. Click **Add Report Comment**.
13. Type the appropriate information and then click **Save**.

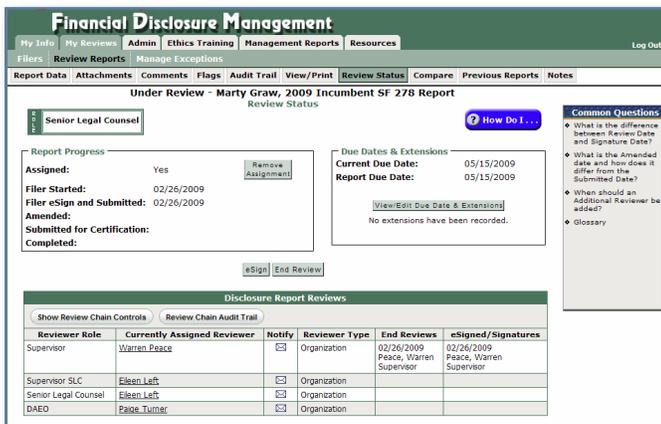
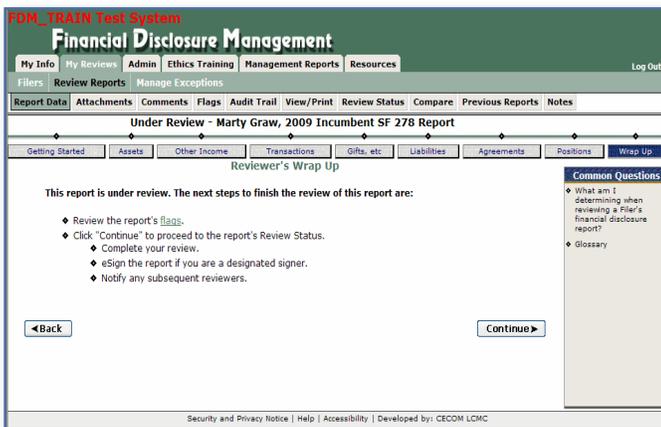
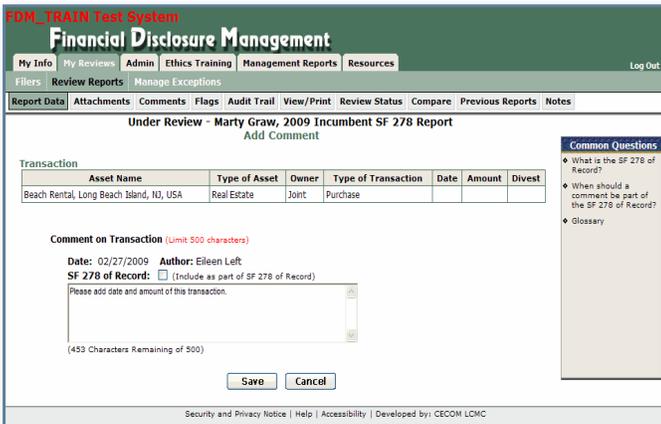
eSign

14. When you have completed your review, click **eSign**.
15. Click **Continue**.

eSigning an OGE 278

Note: Do not click eSign, if you want the Filer to make changes prior to you completing your review.

16. On the Review Status page, click eSign. A message displays confirming your review.
17. Click **OK**.
18. Click **eSign**. An e-mail message is sent to the next set of reviewers indicating that the report is awaiting their review.



Ending Initial Review

A reviewer can End Initial Review indicating that they have conducted an initial review of a financial disclosure report. Ending Initial Review is not the same as eSigning a report as it does not sign the report. You can still add comments to the disclosure after you have ended your initial review.

19. On the Review Status page, click **End Initial Review**. A message displays indicating that if the filer amends this report you will need to review the report again.

20. Click **OK** to end your initial review. The Review Status page is displayed.

Note: The Days in Review counter does not stop when a reviewer clicks the **End Initial Review** button. Days in Review only stops after a certifying authority eSigns and Completes a report.

Senior Legal Counsel [How Do I...](#)

Report Progress

Assigned: No [Assign](#)

Filer Started: 10/07/2010

Filer eSign and Submitted: 10/07/2010

Amended:

Submitted for Certification:

Completed:

[Request Filer Amend](#) [End Initial Review](#) [eSign](#)

Disclosure Report Reviews

Reviewer Role	Currently Assigned Reviewer	Notify	Reviewer Type	End Initial Review Dates	eSigned/Signatures
Supervisor	Public_X SupervisorPOC	<input type="checkbox"/>	Organization		
Supervisor SLC	Brock_X.Lee	<input type="checkbox"/>	Organization		
Senior Legal Counsel	Brock_X.Lee	<input type="checkbox"/>	Organization		
DAEO	CIO D.DAEO	<input type="checkbox"/>	Organization		

Request Filer Amend a Report

DAEOS and Senior Legal Counsels can request a filer amend their report directly from FDM. FDM adds a report comment to the report once an amendment is requested. The reviewer can also add this comment as a Note for the report. The amendment request information then prepopulates into an e-mail that the reviewers sends to the filer through the reviewer's e-mail application. Once the reviewer clicks Request Filer Amend, the report is only accessible on the Manage Exceptions page.

Note: Legal Reviewers can only request an amendment if the report has a status of Under Review.

21. On the Review Status page, click **Request Filer Amend**. The Add Report Comment and Note page is displayed.

22. Type any additional information in the comment about the requested amendment and then copy and paste this comment into the Notes text box.

23. Click **Continue**. Your e-mail client opens with a default message to the Filer about amending their report in FDM.

24. Click **Send**.

Determining if an Amendment was Requested

The Notes column on the Manage Exceptions display of reports will reflect the most recent Note on a report. If that is the "amendment requested" note you will see it as shown below. To determine if an amendment was requested for a specific report:

25. Go to **My Reviews | Manage Exceptions**.

26. Click **View** beside the appropriate report.

27. Click the **Comments** tab to review the amendment request.

Note: A report that has an Amendment Request will remain on the Manage Exceptions list until the report is certified in FDM.

Request Filer Amend - Add Report Comment and Notes

Instructions: Request Filer Amend is a 3-step process. 1. Add a short comment about the amendment request. You may edit the initial text in the "Comment on Report" text box. 2. Add an e-mail (may accept the default or extend it as needed). Reports with eNotes display on the My Reviews | Manage Exceptions tab (instead of the My Reviews | Review Reports World view). 3. Email the Filer by clicking "Continue" below after composing your report comment and notes on this page. This action will open your email and include the text you entered in the Comment for further adding in the email.

Tips: To copy and paste all or part of your Comment text into the Notes box: 1. Place your cursor at the beginning of the text you want to copy. 2. Hold down the LEFT mouse button while you drag/point across the text. 3. Click the RIGHT mouse button and select COPY from the menu. 4. Place your cursor in the notes box. 5. Click the RIGHT mouse button and select PASTE from the menu.

Comment on Report: (Limit 500 characters)
Date: 10/09/2010 Author: Brock X. Lee

Report returned to filer for amendment.

(481 Characters Remaining of 500)

Notes: (Limit 10,000 characters)
10/9/2010 by Lee, Brock X. - Report returned to filer for amendment.

(9932 Characters Remaining of 10000)

[Back](#) [Continue](#)

Notes

The Notes tool allows reviewers to attach an electronic "post-it" note to indicate that there are items within the filers report that require a follow up before the report can be certified. Once a Note is added, the report moves from the Reports Worklist to the Manage Exceptions List. To add a Note to a Filer's report.

28. Select the **Notes** tab.
 29. Click **Start/Add More Notes**.
 30. Type your note and click **Save**. A message is displayed indicating that this report moved to the Manage Exceptions List.
 31. Click on **Back** to return to the report.
- Note:** Although you can eSign a report with an open note, it is a good business practice to close or delete the note before you eSign and Complete.

Closing and Deleting Report Notes

To remove a report from the Manage Exceptions list, a 450 Certifier can either close or delete the existing report note(s).

- Closing a report Note indicates that the report is ready for final review.
- Deleting report Notes, removes all report Note text.

VIEWING/PRINTING A REPORT

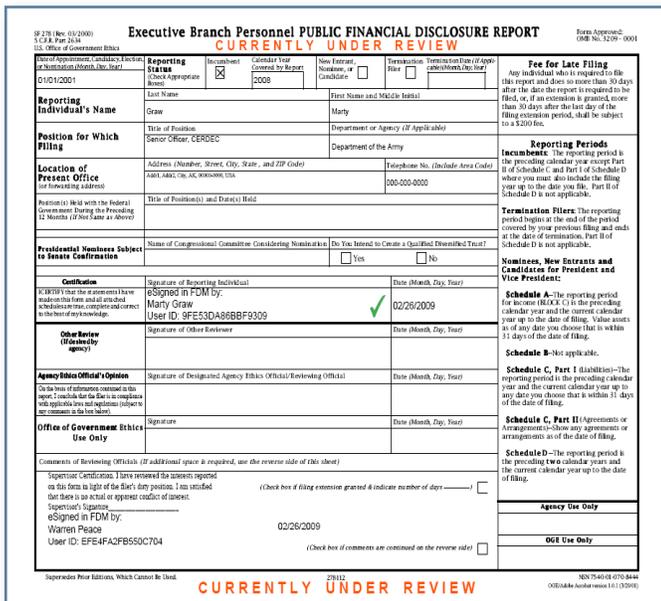
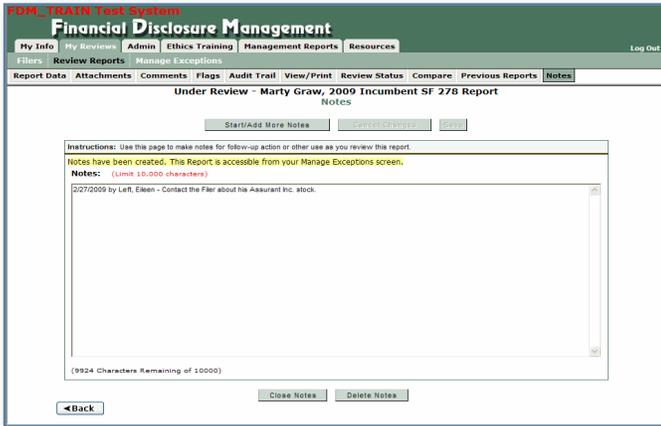
At any time, you can view and print a financial disclosure report.

1. Click **View** beside the appropriate report on the Review Reports | Reports List page.
2. Click **View/Print** and then click **View/Print** again. The report displays in a separate browser window in PDF form.

HINT! You may open the disclosure report on the **View/Print** tab and then move to the specific Report Data section of the report (click Report Data, then click the Report Progress Bar section, e.g., Assets, Other Income) to advance to a specific section of the OGE 278) to add a comment or check Flags.

Printing a Report

3. Print the PDF form by selecting **File | Print** and then click **Print**.



REVIEWING AN AMENDED OGE 278

Once a Filer "amends" a report, you will receive an e-mail notification to again review it and record your eSignature.

1. On the **My Reviews / Reports List** tab (or if the report has a note attached, select **My Reviews / Manage Exceptions**), under the Search section, select the **Role, Form Type, Year, Reporting Status, Review Status, and Action** or search by Filer Name.
2. Click **Search**. Results from your search criteria are displayed.

Crossed out Review Dates indicates that the report was amended and needs to be reviewed once again.

3. Click **View** beside the appropriate report.

Audit Trail

Review the Audit Trail to review report events and to verify if your recommended changes were made by the Filer.

4. Click **Audit Trail**. The Audit Trail page displays.

Reviewing a Report's Events

5. Click **View Event** beside the revised line item.

Reviewer's eSign

6. Click **Report Data** and then **eSign** to record your review.
7. Click **Continue**. The Review Status page is displayed.
8. Review the report and signoff progress.
9. **eSign** the report.

Submit to DAEO

10. If you are an SLC and have eSigned, the report is automatically **Submitted to DAEO and the DAEO receives** An e-mail message is sent to the DAEO advising that this report is ready to be complete.

Note: Further changes by the Filer are prevented once this option is selected.

To view other training materials, click on <https://www.fdm.army.mil/learningCenter/learningCenter.htm>

SUPPLEMENTAL REPORT COMMENTS AND ATTACHMENTS

At times, reviewers may want to include additional report information even after the report review is complete (e.g. a disqualification, an ethics agreement.) In FDM, Supervisor reviewers, SLCs, DAEOS and their ECs/Assistants can add supplemental report comments and report attachments once the report is complete.

1. On the Reports List Page, click **View** beside the appropriate OGE 450 completed report.

You can add either additional report comments or attachments to a completed report.

Supplemental Report Comments

2. Click the Comments sub-tab and then click **Add Report Comment**.

3. Type your comment and then click **Save**.

At this point, you can edit the comment you just added or add any additional report comments. Report comments cannot be deleted.

Supplemental Report Attachments

4. Click the **Attachments** sub-tab and then click **Add Attachment**.

5. Select the **Attachment Type** and then type a brief description of your file in the **Notes** field.

6. Click **Browse** to locate the file you wish to upload and then click **Upload**.

At this point, you can Replace and/or Delete any existing attachments or add a new attachment.

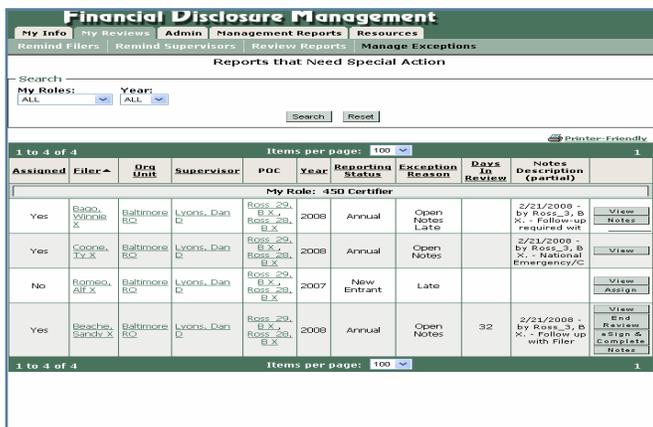
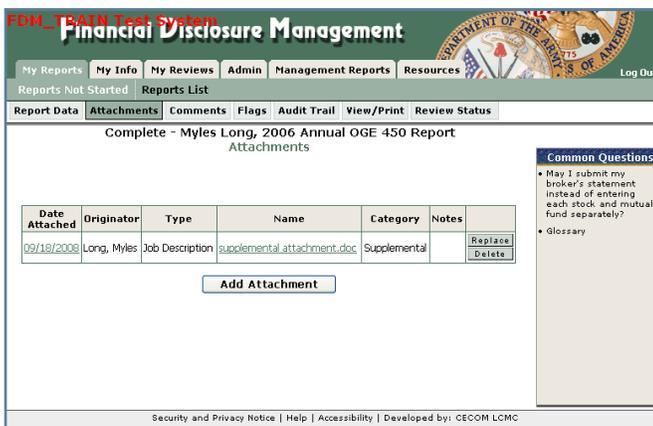
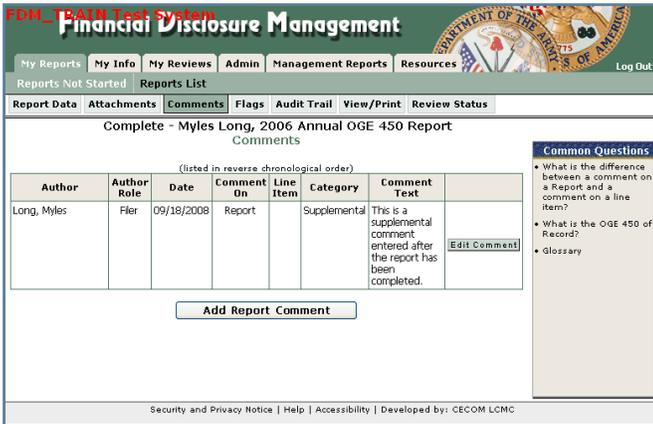
MANAGE EXCEPTIONS

The Manage Exceptions tool allows 450 Certifiers to track Filer and Supervisor Reviewer compliance and to manage reports that require any special action(s). Reports display on the Manage Exceptions list if:

- OPEN NOTES - The Report has existing Notes or a National Emergency/Combat Zone extension has been recorded for the report.
- LATE - The Filer has not submitted the report by the report's due date.
- LATE - More than 30 days have passed since the Filer has submitted (or re-submitted if their report in FDM) and the Supervisor has not eSigned.

To complete your review of a report with notes from the Manage Exceptions list:

1. Click **Notes** beside the appropriate report.
2. Review the existing notes. When complete, you can click either **Close** or **Delete Notes** to indicate that the report review can now be completed.
3. Click **OK** to the confirmation message.
If the report is ready for certification:
4. Select the **Review Status** tab.
5. Click **eSign** and **Complete**. Your review has been recorded.



DELETING A REPORT

DAEOS and their ECs can delete or remove 278 reports that are unneeded, erroneous, and/or "Admin Closed." This feature allows you to get rid of abandoned Draft reports left in FDM after a Filer was deleted, as well as incomplete reports that will never be completed and those reports that are "Admin Closed."

A report is eligible for deletion if:

- the report has a Review Status of Certified Complete and the date is six years after the last Filer eSign date.
- the report has a Review Status of Completed without signature and the date is six years after the report completion date.
- the report has a Review Status of Draft.
- the report has a Review Status of Under Review.

Note: Once a report is deleted from FDM, it cannot be recovered.

To delete a report from the Reports Worklist View or Org Unit view:

1. Click **My Reviews | Review Reports**.
2. In the Search area select the appropriate filers and click **Search**.
3. Click on **View** beside the report you wish to delete.
4. Click on the **Review Status** tab.
5. On the Review Status page, click on the **Delete** button. The Delete Confirmation page is displayed.
6. Select **Yes, permanently delete this report** checkbox and then click the **Confirm** button.

The report is now permanently removed from FDM.

Report Progress

Assigned: Yes

Filer Started: 10/07/2010

Filer eSign and Submitted:

Amended:

Submitted for Certification:

Completed:

Due Date & Extensions

Current Due Date: 05/17/2010

No extensions have been recorded.

Disclosure Report Reviews

Reviewer Role	Currently Assigned Reviewer	Notify	Reviewer Type	End Initial Review Dates	eSigned/Signatures
Supervisor	Public X SupervisorPOC	<input type="checkbox"/>	Organization		
Supervisor SLC	Brock X Lee	<input type="checkbox"/>	Organization		
Senior Legal Counsel	Brock X Lee	<input type="checkbox"/>	Organization		
DAEO	DemoOGC X DAEO	<input type="checkbox"/>	Organization		

Confirm Permanent Report Deletion - Warning

Warning! You are about to permanently delete a report from FDM.

DELETED REPORTS CANNOT BE RECOVERED.

Review the retention rule in [§ 2634.603 Custody of and access to public reports](#) before permanently deleting the report from FDM.

Yes, permanently delete this report.

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