

Financial Disclosure Management

Deployment Strategy

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DEPLOYMENT PLANNING & PREPARATION.....2

 AGENCY KICKOFF2

 Objectives2

CONFIGURATION.....3

 System Requirements and LDAP Set Up for Non DoD Agencies without PIV Cards.....3

 DoD Agencies with CAC Cards.....3

 FDM Agency Preferences3

 Agency Org Unit Set Up.....3

INFORM.....4

 Change Management and Communications4

TRANSFORMATION.....5

 DATA PLANNING5

TRAINING6

APPENDIX A7

 HIGH LEVEL DEPLOYMENT PLAN.....7

APPENDIX B8

 Identifying Agency Core Deployment Team.....8

APPENDIX C9

 DEPLOYMENT ACTIVITY CHECKLIST9

APPENDIX D11

 ISSUE MANAGEMENT.....11

 CHANGE CONTROL MANAGEMENT12

Deployment Planning & Preparation

Deploying a new web application requires planning, collaboration, and coordination between Agency and consultants from the Financial Disclosure Management (FDM) project. A variety of complex tasks must be completed, such as analyzing the business processes in disclosure management, configuring and populating organization information and members, and supporting end users with information, help, and training as they begin to use the new system.

The purpose of this document is to assist agencies who are new to FDM and are transitioning from a paper process to an electronic filing process using FDM. This guide will provide comprehensive event planning and strategies for making a smooth and efficient transition to FDM.

FDM is a web-based application designed to support OGE's required financial disclosure reporting process. FDM automates the process for filing, reviewing and storing Public Financial Disclosure reports (OGE 278) and Confidential Financial Disclosure reports (OGE 450) and allows agencies to fully manage and administer the entire financial disclosure process. OGE has endorsed and authorized the use of FDM by federal agencies in order to facilitate the filing of OGE 450 and OGE 278 financial disclosure forms.

Agency Kickoff

An FDM Deployment Services Consultant will schedule a kickoff meeting with the Agency Deployment Team to plan for your agency's transformation process to FDM. During this meeting, the FDM Team will familiarize your agency with the key players in FDM, demonstrate the basic capabilities of the program review the deployment strategy, discuss process issues and address any questions.

Objectives

- ❖ Jointly define a schedule of key events over the next several months, including training, meetings, and launch dates for the FDM program within your agency. Refer to [Appendix A](#), which outlines required and recommended project tasks to deploy FDM.
- ❖ Establishing a Core Deployment Team and define the roles and responsibilities of participants. Refer to [Appendix B](#) for a definition of required roles and responsibilities.
- ❖ Discuss agency's current financial disclosure SOPs and how to incorporate FDM. Utilize the Deployment Activity Checklist, located in [Appendix C](#) to identify and record changes to the current SOP.
- ❖ Review Communication/Training strategy

Review Status Meetings

Following the Kickoff meeting, Review Status meetings will be scheduled appropriately to discuss project status, issues and change requests. Refer to [Appendix D](#) for Issue Management Procedures and Change Control procedures.

Configuration

System Requirements and LDAP Set Up for Non DoD Agencies without PIV Cards

To ensure that the Agency has the required infrastructure in place to use FDM, the Agency IT POC or other authorized IT personnel must review and agree to the FDM MOU/ISA, which specifies the technical and security requirements of the FDM and Agency interconnection. FDM requires access to Agency supplied services: an authentication service and a user directory. Without access to Agency supplied services, the Agency cannot pilot FDM. Access to the Agency's authentication services is crucial for user authentication in FDM.

FDM utilizes an Agency LDAP (Lightweight Directory Access Protocol) for authentication, search and to correlate smart card identity. (Not all agencies use smart card technology.) The LDAP used for authentication and directory service can be the same. If the authentication service and directory are different, then the user-id for both must be unique and the same on both LDAP servers.

The Agency IT POC will be responsible for the following:

- ❖ Determining if the Agency's Directory and authentication services can be exposed through the Agency's Firewall.
- ❖ Reviewing the LDAP (Directory) Specification and making required fields available. See the FDM LDAP Specification & Data Requirements.
- ❖ Initiating/Testing the Service.
- ❖ Loading all of the appropriate PKI Certificates to end users computers.
- ❖ Ensuring end user's PCs meet the minimum system requirements for using FDM. See <https://www.fdm.army.mil/helpSupport/knowledgeCenter.htm> for a listing of minimum system requirements for using FDM.

DoD Agencies with CAC Cards

If the agency is a component of the DoD or uses smart card technology in compliance with the DoD PKI infrastructure, then authentication is accomplished by inserting the CAC into a reader and validating the user's digital certificate. FDM in this case uses the Global Directory Service (GDS) to provide a lookup directory.

FDM Agency Preferences

An Agency can request certain application preferences, such as links to Help Resources, Signature Type, etc., be available to their users in FDM. The Agency Action Officer should provide guidance for setting up the Agency Preferences and Agency Contacts & Links information. The FDM PMO System Administrator will update FDM with your choices. Please see [FDM Deployment Agency Preferences](#) for a listing of the Agency Preferences.

Agency Org Unit Set Up

Before an Agency can begin using FDM, an Agency Org Unit and its members must first be established in FDM. The Agency and its members reside as the top-level org unit for the Agency in FDM. The members of the Agency Org unit become the default or acting members of any sub-org units for the Agency in FDM. All Agency Org Unit members will be able to review all sub-org unit disclosure reports in FDM except for the Agency Administrator. The Agency Action Officer should provide guidance for setting up the Agency Org Unit in FDM. The FDM PMO System Administrator will update FDM with your choices. The FDM PMO must be notified anytime agency members are removed to ensure all system preferences are applied appropriately.

FDM allows for sub-agencies in an Agency hierarchy. However, these sub-agencies must be placed directly beneath the initial Agency. The FDM PMO must be notified anytime a sub-agency is added to FDM to ensure all system preferences are applied appropriately.

Inform

Change Management and Communications

The goal of change management is to prepare your agency and its end users for implementation of the system. This includes preparing Ethics Counselors, administrative personnel and filers of the various roles they will have in the system. One goal is to identify and communicate these changes in ways that allow end users to adapt their policies to the new system

Communication is a critical success factor on any project involving the implementation of a web application. The key ingredient in a successful transformation is clear and effective communications from the legal office to the users of FDM. To gain user acceptance and adoption of FDM, the FDM PMO recommends that the Agency Core team develop communications plan generally targeted toward three audience groups: legal community, administrators (POCs and Supervisors) and Filers. These communications should provide instruction and support in using the new system. The FDM PMO can provide sample communications and timeline (announcement schedule) to assist the legal office in having well-informed FDM users.

See [FDM Deployment Communications Timeline and Samples](#) for a sample communications timeline/plan and sample communications.

Transformation

Data Planning

The final phase of your FDM deployment is setting up your data in FDM. Depending upon the size of your Agency, the procedure for recording your org units and Filers should occur in two phases: data collection via spreadsheet and then data entry directly into FDM.

The data collection phase should begin once you have sent out the FDM announcements and introductory materials to your Points of Contacts (POCs), FDM POC Basic User Guide [FDM_POC_Basic_User_Guide.pdf](#) or POC Basic User Guide Tutorial [POC_Basic_User_Guide_Tutorial](#). Data entry into FDM begins once the spreadsheets have been updated and reviewed. To allow enough time for accurate data collection and input, the FDM PMO recommends beginning this process at least three months prior to the upcoming filing season.

During your initial year of using FDM, POCs will be asked to do a great deal of work including the front-loading of all filers and org units within your agency. In most agencies, the Ethics Counselor is not directly responsible for individually notifying filers of their requirement to file. Instead, your agency may have an established network of organizational or departmental Points of Contact (POCs) who are responsible for the administration of OGE 450 and OGE 278 filers.

This transformation phase may be considerably time consuming depending on the size of your organization. However, during subsequent years of FDM use, your POCs can use FDM directly to update your list of filers through FDM.

The FDM team has developed a simple spreadsheet for each organization POC to complete prior to entering data into FDM. The form outlines required information for setting up org units in FDM. 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. In addition, FDM has a bulk registration tool that allows up to 25 OGE 450 filers to be entered at one time to a particular Org Unit.

See the [FDM Filer and Org Unit Registration Spreadsheet](#) for the FDM org Unit data collection template and instructions. The FDM Learning Center has guides and online tutorials to assist POCs in entering their Org Unit and Filer Data.

Training

Producing knowledgeable, confident and effective end users is key deliverable of any computing system implementation. Depending upon the size of your Agency, you may want to utilize the training materials available in the [FDM Learning Center](#).

To provide distributed support in the installations/offices in your agency, the FDM PMO recommends establishing "power users" and "coaches" who will receive advanced training in order to support their colleagues more directly.

Each Agency should offer training to local legal office personnel and organizational coordinators. The FDM PMO will provide instructor led or e-meeting sessions (Synchronous Learning) to designated power users sufficiently in advance of implementation. In addition, the FDM Website provides a variety of instructional tools that cover all of the topics and concepts end users need to learn about to use FDM. Business processes will be documented in the training materials, and they will be conveyed within the full context of the appropriate activity, task, tool, or procedure that end users need to understand. Training modules are defined by the topics they cover. Related concepts and procedures are grouped together into the same module.

Change management activities will tie in with end-user training to help users make transitions to new roles and responsibilities in their work. Ultimately, the objective and chief benefit of providing good training is to ensure that data is accurately entered, managed, and maintained in the system. Equally important is the goal and benefit of providing the means for users to make a successful transition from the old system to the new one.

The FDM Project team can supply a training database to provide users with a technical environment in which they can learn new procedures hands-on. The training database can be shared across agencies on a request basis. The FDM Training team will work with the agency's Training Coordinators to arrange use of the training database, refreshes, and "freeze dates" for system updates to minimize the impact of constant changes on the training materials. In addition, FDM Trainers will work with FDM Security administrators to provide trainees with the roles in the training database appropriate for each training topic presented.

Appendix A

Below is an outline of the high-level tasks that need to be completed in order to deploy FDM. To access the full project plan task list, go to the [FDM Deployment Kit](#). The plan outlines, in detail, the order of deployment events and who should be assigned to each task. As you will see on the project plan, many of the tasks can and should occur concurrently.

ACTION ITEM

Review High Level and Detail Project Plan. Communicate any issues and risks to the FDM PMO.

High Level Deployment Plan

AGENCY PLANNING AND PREPARATION

- Step 1 - Letter of Intent**
- Step 2 FSA**
- Step 3 - Funding**
- Step 4 - MOU/ISA**

Deployment/Transition Process Begin

Agency Kickoff

AGENCY DEPLOYMENT TEAM PLANNING AND PREPARATION

I. ORGANIZE - Resource Planning

II. CONFIGURATION - FDM Agency/LDAP Set Up

LDAP Configuration

Agency Configuration

III. INFORM

Change Management & Communications

IV. Transform/Learn

Data Planning

POCs Update Filer & Org Unit Registration Spreadsheet

Train/Demo FDM

Data Setup Begin

Appendix B

Identifying Agency Core Deployment Team

The recommended process for transforming your agency's financial disclosure reporting process is to identify several key individuals to become FDM subject matter experts. The FDM PMO recommends each agency organize a Core Deployment team and then assign specific roles to team members. The core team should include experts in Financial Disclosure Management (Ethics Counselors and a senior legal official) and an IT representative. Depending on the size of your organization and the complexity of your deployment, you might also want to create sub-teams of Ethics Counselors and/or technology experts. Also, be sure to include help desk or support personnel.

Note: In the case of smaller agencies, a single individual may hold multiple roles.

The Ethics Counselor will be considered the FDM subject matter expert (SME) and will receive the bulk of the train-the-trainer training. Just as this person was the main facilitator of the paper filing process for financial disclosure reports, this person will continue to facilitate the electronic process using the FDM program. You might consider assigning your core deployment team responsibilities as listed below.

ACTION ITEM

Identify and notify your Agency Core Deployment Team members. E-mail the list of Agency Deployment Team members, their responsibilities and contact information to the FDM PMO.

Agency Action Officer	The Agency Action Officer is the deployment project manager and is responsible for planning and the day-to-day operations of integrating FDM's automated financial disclosure process into the Agency. This person is also usually designated as the FDM Agency Administrator and subject matter expert.
Agency IT POC	Your agency will also need to appoint a lead information technology expert to facilitate the technical aspects of adopting the FDM program. The Agency IT POC is a senior IT project manager having the authority to arrange IT resources for making Agency directory and authentication services available for use by FDM. Your FDM users will require assistance from your agency's local computer helpdesks just as they do for any other programs that your agency uses.
Participating Legal/Administrative Members	These are members of the legal team in the Agency. Their responsibilities within the deployment team are the same as they are within the Agency.

Appendix C

Deployment Activity Checklist

Part of the FDM transformation process will include reviewing and modifying the Agency’s current standard operating procedures (SOP) to incorporate FDM. Some tasks may no longer be required due to the Agency’s use of FDM. Once the assessment of the Agency SOP is complete, the agency should document and communicate these amended SOPs to all affected personnel. The Deployment Activity Checklist should be revised based upon the updated Agency’s SOP.

ACTION ITEM

Review you Agency’s filing SOP and compare to the FDM Deployment Activity Checklist. Update checklist appropriately and communicate the changes to local agency administrators and FDM PMO.

Completed	Activity Definition
Activity to begin JULY 1 thru OCT 1	
	<p>Provide FDM Announcement and Introductory materials/ Facilitating User Acceptance and Adoption of FDM</p> <ul style="list-style-type: none"> ▪ As with any automation of manual processes, there is an initial resistance to adoption of new methods and procedures. The FDM PMO has found through their experiences deploying FDM to various organizations that if users understood why the agency was implementing FDM, how it could make them more efficient and where to get information or support, they would more easily accept and adopt FDM. ▪ To build enthusiasm and support for change, as well as to minimize confusion and the potential number of support calls, it is important for you to send Announcements and Introductory materials to your users. The FDM PMO believes that if users could understand the bigger picture, they would be more accepting of the temporary inconveniences during the startup period. Sample communications to POCs can be found at FDM Deployment Communications Samples. These communications should convey: <ul style="list-style-type: none"> – Program objectives and benefits – Program Status – Expected System behavior
	<p>Identify POCs - Send request to POCs to update POC list for each</p> <ul style="list-style-type: none"> ▪ In most agencies, the Ethics Counselor is not directly responsible for individually notifying filers of their requirement to file. Instead, your agency may have an established network of organization or department Points of Contact (POC) for the filing of OGE 450 and OGE 278 forms. If your agency is small, the Ethics Counselor may not have POCs for smaller organizations or departments. ▪ If your organization does have a network of POCs, sometime prior to the filing season, the Ethics Counselor should update the list of POCs. It is recommended, that the Ethics Counselor contact the POCs and request a positive response if they are still the financial disclosure form POC. It is best that the Ethics Counselor requests the POCs to provide an alternate POC or a replacement POC when appropriate.
	<p>Send introductory e-mail to POCs about FDM and their expected participation (Include timeline for gathering Filer, Org Unit and Reviewer list)</p> <ul style="list-style-type: none"> ▪ Ethics Counselors will need to inform and train POCs on their new responsibilities within FDM. FDM closely mirrors the paper process by allowing POCs to track and manage filers using the tools in FDM. In FDM, POCs are primarily responsible for a variety of tasks including loading filer and Org Unit data into FDM and keeping filers and supervisors aware of the filing season and deadlines. ▪ During your initial year, it is recommended that you begin informing, training, and executing these steps with your POC several months in advance of the filing season to ensure accuracy and completion of all tasks.
	<p>POCS Gather Filer, Review Chain and Org List (Spreadsheet)</p> <ul style="list-style-type: none"> ▪ To assist you in organizing the 450 filers you support, use the attached Registration spreadsheet in FDM Filer and Org Unit Registration Spreadsheet. This spreadsheet is a tool for organizational POCs to manage 450 filers and prepare to register them in FDM. We recommend distributing the spreadsheet to your organization POCs so they can obtain the information needed to register the OGE 450 filers 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. ▪ At the same time, you will need to identify who in your office will certify OGE 450s for each organization you support. We recommend you indicate that on the spreadsheet

	<p>you distribute.</p> <ul style="list-style-type: none"> Once your spreadsheets are completed, your POCs can begin registering your organization(s) and 450 filers in FDM for you.
	Determine Filer to Org Unit Groupings
	<p>Add High Level POCs (and Supervisors) and Org Units to FDM</p> <ul style="list-style-type: none"> Before POCs can begin their FDM input, you will need to identify and input your higher-level organizational POCs who manage both 278 and 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.
	Confirm POC, Review Chain and Filer Lists
Additional Tasks	
FDM POCs and Supervisors cannot perform the tasks of adding SLCs and 450 Certifiers. Only FDM SLCs and DAEOs can manage SLCs and 450 Certifiers in FDM.	
	Update FDM SLC Listing
	Update FDM 450 Certifier Listing
	<p>Send Communication to POCs to begin the data input</p> <ul style="list-style-type: none"> Once you have established your top-level organization hierarchy in FDM, you will need to notify the assigned POCs that they can begin their data entry.
	Send communication to OGE 450 Filers and Supervisors telling them FDM registration process has begun for 2009 filing season.
Local Agency FDM Activities	
	Update FDM POC Listing
	Update FDM Supervisor Listing
OGE 450 Activity to begin NLT OCT 30	
	<p>Update FDM OGE 450 Filer Listing</p> <ul style="list-style-type: none"> Review Filer Spreadsheet Add New Filers where necessary Determine appropriate Org Unit Location Place Filer under Appropriate Org Unit- WARNING - Automatic e-mails are sent from FDM to Filers and their Supervisors as Filers are added to FDM.
OGE Annual 450 Activity to begin NLT than JAN 5	
	<p>Send Initial Notification to Filers</p> <ul style="list-style-type: none"> Locate appropriate Filers. Include internal suspense date if required Send Remind Annual OGE 450 Filers message - WARNING - OGE 450 Filers who are registered as an OGE 450 Filer will automatically be assigned to file an OGE 450 Annual report on December 31.
OGE 278 Activity to begin NLT than JAN 1	
	<p>Update FDM OGE 278 Filer Listing</p> <ul style="list-style-type: none"> Review Filer Spreadsheet Add New Filers where necessary Determine appropriate Org Unit Location Place Filer under Appropriate Org Unit - WARNING - Automatic e-mails are sent from FDM to Filers and their Supervisors as Filers are added to FDM.
Activity to begin NLT than JAN 20	
	<p>Send Notifications to Delinquent Filer</p> <ul style="list-style-type: none"> Check Delinquent Filers who have not begun and/or completed their filing activities Record Extensions Send Reminder Notification to Filer of requirement to file Create and send an e-mail message to send to the selected Filers Check Delinquent Supervisor Reviewers Create and send an e-mail message to send to the selected Supervisors
Additional Tasks	
These tasks can be performed any time after the org units and members for your agency are set up. FDM Administrators cannot perform these tasks for end users in FDM. FDM Users must establish their own ECs and assistants in FDM.	
	Update Assistants/ECs

Appendix D

Issue Management

Issue Management is the manner within which issues are identified and resolved within projects. A formal process for managing issues will ensure that the problems are identified and resolved as quickly and effectively as possible. The FDM PMO utilizes the following process as a way to manage project issues.

1. Solicit potential issues from any Core Deployment Team member. The issues can be surfaced through verbal or written means but must be formally documented in the project's Issue Log. (If an issue cannot be documented, there is no way it can be resolved.)
2. The project manager/government lead will determine if the problem should be classified as a formal issue, document the issue and assign an issue owner.
3. The issue owner will then develop an action plan to resolve the issue. The action plan identifies the expected resolution date.
4. The project manager and the project team will review issues weekly to ensure that action is being taken.
5. The various alternatives and impacts on schedule and budget are documented on the Issues Log.
6. Any appropriate corrective activities will be added to the work plan to ensure the issue is resolved.

Note: If the resolution of an issue causes the budget or duration of the project to change, the current Product Plan should be updated.

7. Issue status and resolutions will be communicated to Agency Core Team members and other appropriate stakeholders through the project Status meetings and other appropriate communication means.

Change Control Management

When deploying a new computing system, change requests are an inevitable part of the process. (Change here refers to changes to the system resulting from reported issues and enhancement requests.) The FDM Project team documents any change requests through a formal Change Management Process to ensure that changes are formally defined, evaluated and approved prior to implementation. The FDM Change Control Board (CBB) is the committee responsible for administering and managing the change control process for all modifications and enhancements to the FDM. The high-level steps of the FDM change control process are outlined below.

- 1.** When a project change is identified, the requestor communicates a thorough description of requested change, business requirements and justification for change including expected benefits, who is immediately benefiting from the increase in scope and who could benefit in the future. This can be done through verbal or written means.
- 2.** The Project Manager and Government lead will review the requested change and make the determination of the change request impact.
- 3.** If it is determined that a change should be initiated, it will be followed up with a System Change Request (SCR). Requests will be logged in the project change request system and assigned a number.
- 4.** The FDM CCB will identify alternatives, including workarounds and business process changes, and an estimate of scope/impact of each (level of effort and resources required by sub teams).
- 5.** Once analysis has been done and the risks and benefits of not making the change are assessed the change request will be presented for approval to the Agency Core Team members and other appropriate stakeholders and prioritized.