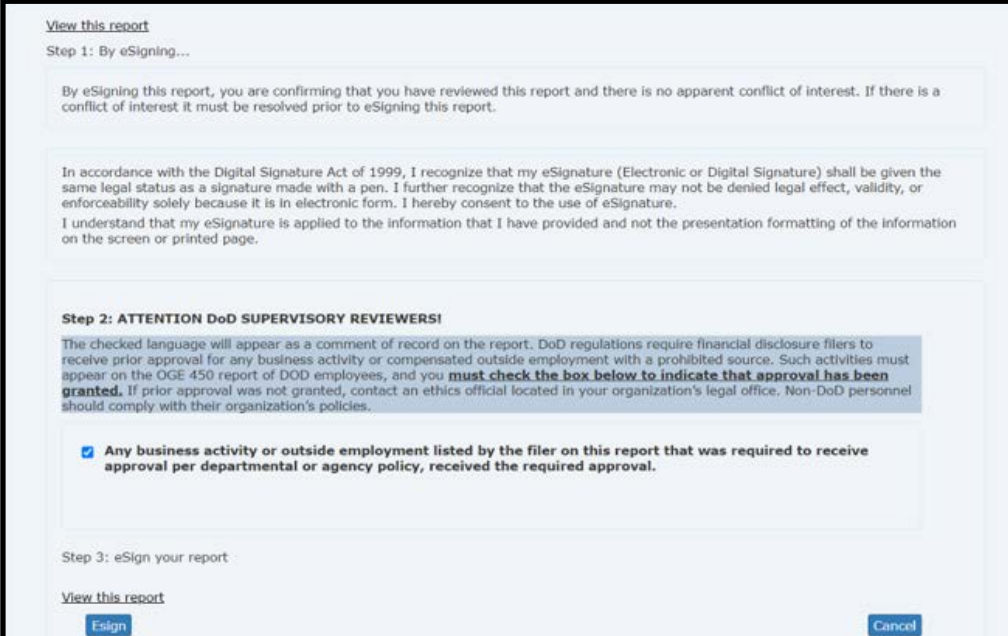


Many federal departments and agencies require their employees to obtain approval to engage in nonfederal activities. The requirements vary from agency to agency. For example, Department of Defense employees who are required to file a financial disclosure report (OGE Forms 450 or 278e), other than a special Government employee, must obtain approval from their agency designee before engaging in a business activity or compensated outside employment with a prohibited source. 5 CFR § 3601.106(a)

FDM now provides reviewing supervisors the opportunity to annotate on an employee's OGE 450 that approval for a reported outside position was provided IAW their department's regulations or policies. The DoD supplemental ethics regulation, applicable to all filers in DoD's components, departments, and agencies, require that approvals for outside activities or positions be annotated on the employee's OGE 450. 5 CFR §3601.106(b).

Reviewing supervisors at all agencies using FDM will be able to indicate that an OGE 450 filer has the required approval for a business activity or outside employment listed on the employee's report (Figures 1 and 2).



The screenshot displays a web-based e-signing interface. At the top, there is a link 'View this report' and the text 'Step 1: By eSigning...'. Below this is a paragraph stating: 'By eSigning this report, you are confirming that you have reviewed this report and there is no apparent conflict of interest. If there is a conflict of interest it must be resolved prior to eSigning this report.' This is followed by a paragraph regarding the Digital Signature Act of 1999 and a consent statement: 'I understand that my eSignature is applied to the information that I have provided and not the presentation formatting of the information on the screen or printed page.' The main section is titled 'Step 2: ATTENTION DoD SUPERVISORY REVIEWERS!'. It contains a blue-shaded box with the following text: 'The checked language will appear as a comment of record on the report. DoD regulations require financial disclosure filers to receive prior approval for any business activity or compensated outside employment with a prohibited source. Such activities must appear on the OGE 450 report of DOD employees, and you **must check the box below to indicate that approval has been granted**. If prior approval was not granted, contact an ethics official located in your organization's legal office. Non-DoD personnel should comply with their organization's policies.' Below this box is a checked checkbox with the text: 'Any business activity or outside employment listed by the filer on this report that was required to receive approval per departmental or agency policy, received the required approval.' At the bottom, there is a 'Step 3: eSign your report' section, another 'View this report' link, and two buttons: 'Esign' and 'Cancel'.

Figure 1. Supervisory Approval for Business Activity or Outside Employment.

FDM will not flag a report or prevent a supervisor from esigning the report if they do not use this functionality by checking the block. The annotation may be a regulatory requirement for DoD and other agencies, but FDM does not force supervisors to make the annotation.

Reviewing supervisors may wish to consult their ethics advisor for their agency's specific requirements on approving and documenting an employee's business activity or compensated outside employment with a nonfederal entity.

Under Review - Supervisor Signed - DA'JUAN MOSLEY, 2023 Annual OGE 450 Report

Comments

* Depicts an asset that the Filer has acknowledged does not contain reportable underlying assets.
**Depicts a legacy asset. No updates can be made to any fields until the legacy asset is changed to a new asset type.

[Add Report Comment](#)

| Author | Author Role | Date | Comment On | Line Item | Category | Comment Text | |
|----------------|-------------|------------|------------|-----------|-----------|---|---|
| Raborg, Ryan R | Reviewer | 11/28/2023 | Report | | Of Record | Any business activity or outside employment listed by the filer on this report that was required to receive approval per departmental or agency policy, received the required approval. |  |

[Add Report Comment](#)

Figure 2. Comments View with Add Report Comment Block