



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

December 8, 1994  
DO-94-046

## MEMORANDUM

TO: Designated Agency Ethics Officials, General Counsels and Inspectors General

FROM: Stephen D. Potts Director

SUBJECT: Financial Disclosure Preparation Software

The Office of Government Ethics (OGE) recently held a brown bag lunch with representatives from several agencies to discuss how computer technology could be used to streamline the financial disclosure filing and review process. We discussed the issue of electronic filing, the current restriction on the development and use of electronic versions of the SF 278 and SF 450 imposed under the General Services Administration's (GSA's) Federal Information Resources Management Regulation (FIRMR) Bulletin B-3, and the possible development of a stand-alone computer program for completing, editing and printing the financial disclosure forms.

As a result of this meeting, it was agreed, that while the concept of electronic filing has certain appeal, on the practical side, it is at this time beyond OGE's and most other agencies' technological capabilities. One of the most notable problems involves the issue of "electronic signatures" and the level of administrative controls and security required to implement a legally sufficient electronic filing process. Nonetheless, we will revisit the idea at a later date.

We also agreed, and have already taken action, to ask GSA and the Office of Management and Budget to lift the restriction on the development and use of electronic versions of the SF 278 and SF 450. Once the restriction is lifted, the burden will be upon each department and agency, using one of these electronic disclosure forms, to ensure the form meets the parameters set out in GSA's FIRMR Bulletin B-3.

Finally, we also agreed to develop a stand-alone computer program for preparing both the public and confidential financial disclosure reports. The software program would be available free, and would operate in a manner similar to the commercially available "tax preparation" type programs. The program would be designed to guide the filer through the form and the filing requirements, ensuring that all appropriate questions are asked and that all appropriate sections of the form are properly completed. Our expectation is that once the form is completed and printed using this program, the ethics official reviewing the form would be relieved of the tedious task of checking the forms for technical accuracy and completeness. We believe this should save reviewers considerable time and effort in their review process.

As part of this software development effort, we are asking all departments and agencies to check among their various offices, to see if anyone has already started developing a financial disclosure preparation program along the lines described above. Obviously, we do not want to reinvent the wheel in this area, but would like to build upon any efforts made to date. If you know of anyone who either has done or is in the process of doing work in this area, please provide their names and phone numbers to Jim Parle, Chief, Office of Information Resources Management, at 202-523-5757, ext. 213.

Also, we would like to know if your department or agency has any GS-334-12/13 Computer Specialists that would be willing to be detailed to this Office on a reimbursable basis for a period not to exceed one year. If so, we would like their names and phone numbers as well.