



DEPARTMENT OF DEFENSE
OFFICE OF GENERAL COUNSEL
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JAN 08 2009
ACTION MEMO

FOR: DEPUTY SECRETARY OF DEFENSE

FROM: Daniel J. Dell'Orto, Principal Deputy General Counsel

SUBJECT: Designation of Secretary of Army as Executive Agent for Financial Disclosure Management (FDM) – Ethics Reporting System

- In the Department of Defense (DoD), about 3,300 Presidential appointees, members of the Senior Executive Service, and General/Flag Officers file Public Financial Disclosure Reports (SF 278) annually. An additional 100,000 DoD personnel file Confidential Financial Disclosure Reports (OGE Form 450) annually.
- The FDM is an Army-developed, Government-owned and operated web-based software program which enables the electronic filing and management of SF 278 and OGE Form 450 reports. FDM improves the accuracy and efficiency of preparing, processing, and reviewing financial reports in a secure environment.
- Assignment of the Army to operate FDM as Executive Agent IAW DoD Directive 5101.1 would eliminate the need for the other military services and defense agencies to reimburse the Army approximately \$1,100,000 for their combined annual usage along with eliminating the administrative overhead associated with such reimbursement.

RECOMMENDATION: Designate the Army as Executive Agent to operate, manage, and fund FDM for DoD for electronic filing of required financial disclosure reports by initialing below:

Approve: _____

Disapprove: _____

Other: _____

Attachments:

FDM Information Paper

Unclassified

