



**Asia-Pacific
Economic Cooperation**

2019/SOM1/ACT/WKSP/006

**Perspectives from the United States: Using
Technology to Enhance Transparency and
Compliance with Ethics Laws**

Submitted by: United States



**Workshop on Digital Government, Integrity
Policies and Corruption Prevention Mechanisms in
APEC Economies
Santiago, Chile
27 February 2019**



Perspectives from the United States: Using Technology to Enhance Transparency & Compliance with Ethics Laws

APEC Chile
Anti-Corruption & Transparency Working Group
27 February 2019

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Workshop on Digital
Government, Integrity Policies
and Corruption Prevention
Mechanism in APEC
Economies

Roadmap

- Quick overview of ethics and financial disclosure overview in the United States
- Online financial disclosure filing system, www.integrity.gov
- Review of disclosure reports by ethics officials
- Public access to disclosure reports
- Enforcement using disclosure reports

Purpose of ethics laws

- ① Ensure that all governmental decisions are based on the public interest, rather than individual interests
- ① Promote public confidence in the integrity of government decision-making
- ① Promote transparency and accountability

The role of financial disclosure

- ⦿ Employees can recognize their own potential conflicts
- ⦿ Agencies can identify and address potential conflicts
 - Remedies: recusal, divestment, limited waivers
- ⦿ Enhances transparency and public confidence
- ⦿ Enforcement tool

Who files financial disclosures?

- ◎ **Public financial disclosures** – Senior government official and political appointees
 - (~ 26,000 across the executive branch)
- ◎ **Confidential financial disclosures** – Employees with substantive responsibilities in contracts, grants, licenses, subsidies, regulations, etc
 - (~ 380,000 across the executive branch)

www.integrity.gov

- Web-based portal designed to facilitate financial disclosure
- Easy for filers to submit reports and change entries as assets change over time
- Easy for ethics officials to review reports, track changes, and monitor progress and completion rates
- Enhances transparency and efficiency

Who can access and review disclosure reports?



Review by Ethics Officials

- ◎ Multiple layers of review:
 - Employee completes report
 - Employee's supervisor reviews report (in some cases)
 - Agency ethics official reviews report
 - For highest-ranking employees, the Office of Government Ethics also reviews the report
- ◎ All public financial disclosure reports are submitted electronically, with some exceptions.

Review by Ethics Officials in Integrity.gov

Records Search

AGENCY: Department of State | ITEM: All | TYPE: 278 | YEAR: 2017 | GROUP: All | STATUS: All

FIRST NAME: Search by First Name | MIDDLE INITIAL: Search by Middle Initial | LAST NAME: Search by Last Name | POSITION: Search by Position | MEMO: Search by Memo

INTEREST NAME: Search by Interest Name | AMENDMENT: All | **Go** | Reset

20 records per page | Search: [] | Customize Display

AGENCY	ITEM	TYPE	YEAR	GROUP	FILER	POSITION	STATUS
No data available in table							

Showing 0 to 0 of 0 entries | Previous | Next

Part 2: Filer's Employment Assets & Income and Retirement Accounts

[Add New Item](#)

In order to have a complete financial disclosure report, you need to report all of the following:

- Each source from which you received more than \$200 in earned and other non-investment income during the reporting period for this section (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes).
- Each asset related to your business, employment, or other income-generating activities if the asset had a value greater than \$1,000 at the end of the preceding calendar year or if you received more than \$200 in income from the asset during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, anticipated payments such as severance, deferred compensation, and intellectual property such as book deals and patents). Click the question mark for more examples.
- Do not include assets or income from United States federal government employment. In addition, do not include assets that were acquired separately from your business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account) because you will report these assets in a later section.

25 records per page

Search:

#	DESCRIPTION	DF	VALUE	INCOME TYPE	INCOME AMOUNT
<input type="checkbox"/> 1	Retirement Account	No			
<input type="checkbox"/> 1.1	Apple Stock	N/A	\$50,001 - \$100,000		None (or less than \$201)
<input type="checkbox"/> 1.2	Vanguard Large Cap Growth Mutual Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
<input type="checkbox"/> 1.3	Amazon Stock	N/A	\$50,001 - \$100,000		\$2,501 - \$5,000
<input type="checkbox"/> 1.4	Fidelity Biotechnology Fund	Yes	\$15,001 - \$50,000		None (or less than \$201)

Showing 1 to 5 of 5 entries

[← Previous](#) 1 [Next →](#)

[Previous Step](#) [Next Step](#)

Part 9: Gifts and Travel Reimbursements

Add New Gift/Reimbursement

For this final section, report:

- Gifts totaling more than \$390 that you and your dependent children received from any one source during the reporting period ¹ for this section.
- Travel reimbursements totaling more than \$390 that you and your dependent children received from any one source during the reporting period. ²
 - If more than one gift or travel reimbursement was received from a single source: (1) Determine the value of each item received from that source. (2) Ignore each item valued at \$156 or less. (3) Add the value of those items valued at more than \$156. If the total is more than \$390, then you must report each item valued at more than \$156.
 - Regardless of the value, however, you do not need to report the following: (1) anything received from relatives; (2) anything received from the United States federal government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to your agency in connection with your official travel; (5) gifts of hospitality (food, lodging, entertainment at the donor's residence or personal premises; and (6) anything received by your dependent children totally independent of their relationship to you. Additional exceptions apply. ³

25 records per page

Search:

#	SOURCE NAME	CITY/STATE	BRIEF DESCRIPTION	VALUE
1	Rock Collectors Association	Los Angeles, California	Airline ticket, hotel room, and meals incident to speech at convention in Los Angeles (August 5-6, 2018). Personal activity unrelated to official duties.	\$2,638.00
2	Nick the Nice Guy	Washington, District of Columbia	Birthday present - new mobile phone	\$600

Showing 1 to 2 of 2 entries

← Previous 1 Next →

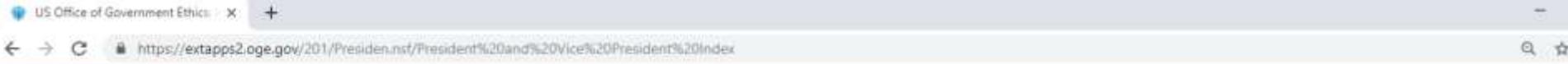
Previous Step

Next Step

Access by the Public and Press

- Financial disclosures of highest-ranking officials posted to www.OGE.gov
- Other financial disclosures can be requested through a “201” request
- Other documents can be requested through a Freedom of Information Act request

Access by the Public & the Press



Presidential and Vice Presidential Financial Disclosure Reports

Certified reports listed here are those submitted by current (and former) President and Vice President. These reports can be downloaded without completing an OGE Form 201.

[All other nominee and appointee reports->](#)

Trump, Donald J. White House Office, President [2018 Financial Disclosure Report](#)
Trump, Donald J. White House Office, President [2017 Financial Disclosure Report](#)

- ▼ Trump, Donald J, White House Office, President
 - [Annual \(2017\)](#)
 - [Annual \(2018\)](#)
- ▼ Pence, Michael R, Office Of The Vice President, Vice President
 - [Annual \(2017\)](#)
 - [Annual \(2018\)](#)
- ▼ Obama, Barack H, White House Office, President
 - [Termination](#)
 - [Annual \(2013\)](#)
 - [Annual \(2015\)](#)
 - [Annual \(2014\)](#)
 - [Annual \(2016\)](#)
- ▼ Biden, Joseph R, Office Of The Vice President, Vice President
 - [Termination](#)
 - [Annual \(2013\)](#)
 - [Annual \(2016\)](#)
 - [Annual \(2014\)](#)
 - [Annual \(2015\)](#)

Report Type:	
Year (Annual Report only):	
Date of Appointment/Termination:	January 20, 2017

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information				
Last Name	First Name	MI	Position	Agency
Trump	Donald	J	President of the United States of America	
Other Federal Government Positions Held During the Preceding 12 Months:				
N/A				
Name of Congressional Committee Considering Nomination (Nominees only):				
N/A				
Filer's Certification - I certify that the statements I have made in this report are true, complete and correct to the best of my knowledge:				
Signature:			Date:	
			JUNE 14/2017	
Agency Ethics Official's Opinion On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below)				
Signature:			Date:	
			June 14, 2017	
Other Review Conducted By:				
Signature:			Date:	
U.S. Office of Government Ethics Certification (if required):				
Signature:			Date:	
			6/16/17	
Comments of Reviewing Officials:				

Access by the Public & the Press



Online OGE Form 201

OGE Form 201

The automated OGE Form 201 is used to request copies of the public financial disclosure reports certified by the U.S. Office of Government Ethics. These records are available under the Ethics in Government Act of 1978 (5 U.S.C. app. 4 § 105) and OGE's regulations implementing this statute. *A list of new Nominees and Confirmations can be obtained from the Senate's "[Nominatees, Confirmations & Vacancies](#)" website.

Instructions

- 1) Find the filer by entering the last name and click Find Filer;
- 2) If duplicate names are found, select the person and position and click OK;
- 3) Select the documents from the list that appears (5 documents maximum per request);
- 4) Complete this form and click Submit.

Your request should be processed within 1 to 2 business days.

[Can't find the documents you're looking for? Click here for frequently asked questions.](#)

Notes: Reports for filers at Pay Levels I and II are available [here](#) without completing the OGE Form 201. Reports that have not yet been certified by the U.S. Office of Government Ethics can be requested through the filer's respective agencies. White House reports can be requested [here](#). Click [here](#) for reports submitted by the President and Vice President. These reports can be downloaded without completing an OGE Form 201.
All Certificates of Divestiture are available [here](#). These require an OGE Form 201 to be completed.

Filer's last name

Agency

Your Information

Your Name (required)

Street Address (required)

Your City (required)

Your State (required)

Your Country (required)

Email Address (or provide mailing street address below)*

Your Occupation (required)

Is this application for or on behalf of any other person or organization? (required)

Access by the Public & Press

The screenshot shows the FOIA.gov website homepage. At the top, there is a navigation bar with the FOIA.gov logo and the text "FOIA.gov" next to it. To the right of the logo, there is a blue box with white text that reads: "Thank you for visiting FOIA.gov, the government's central website for FOIA. We'll continue to make improvements to the site and look forward to your input. Please submit feedback to National.FOIAPortal@usdoj.gov." Below the navigation bar, there are several menu items: "Learn about FOIA", "Before you request", "Create a request", "Agency FOIA data", and "Agency login". The main content area features a large blue box with white text that reads: "The basic function of the Freedom of Information Act is to ensure informed citizens, vital to the functioning of a democratic society." Below this text, there is a smaller blue box with white text that reads: "This site can help you determine if filing a FOIA request is the best option for you and help you create your request when you're ready." At the bottom of this blue box, there are two links: "Tips for making a request" and "Start your request". Below the blue box, there is a white box with blue text that reads: "Do research and determine if you need to make a FOIA request, then get ready." At the bottom of the page, there are three icons with text: "Do research before you request", "Identify the right agency", and "What happens next".

FOIA.gov - Freedom of Informa: x

https://www.foia.gov

An official website of the United States government

UNITED STATES DEPARTMENT OF JUSTICE

 FOIA.gov

Thank you for visiting FOIA.gov, the government's central website for FOIA. We'll continue to make improvements to the site and look forward to your input. Please submit feedback to National.FOIAPortal@usdoj.gov.

Learn about FOIA ▾ Before you request ▾ Create a request Agency FOIA data ▾ Agency login

The basic function of the Freedom of Information Act is to ensure informed citizens, vital to the functioning of a democratic society.

This site can help you determine if filing a FOIA request is the best option for you and help you create your request when you're ready.

[Tips for making a request](#) or [Start your request](#)

Do research and determine if you need to make a FOIA request, then get ready.

 Do research before you request +  Identify the right agency +  What happens next +



Virtual Reading Room Documents Search

Search Tips

Administrative Rulings, Policy Statements, and Other Publications

Document Collections

Records Released in Litigation

Records Released under Mandatory Declassification Review (MDR)

Department of State Website Search

Virtual Reading Room Documents Search

Search Terms

Document Date

From To

Date Posted

From To

Case Number

Documents last added on November 01, 2018.

Total searchable documents: 207,484

Search

Disclaimer

This search is based upon locating specified words in the electronic text of documents. However, in many cases, this is dependent upon the conversion of the text in paper documents to electronic text through optical character recognition (OCR). Because of age and condition of some paper documents, the OCR may not recognize certain characters and words correctly. Please keep this in mind when using full text search, as these anomalies may affect the results of your search for relevant documents using your search criteria.

Please Note

- Some of the documents in the Virtual Reading Room are those of other federal agencies. Any questions regarding other federal agencies' documents should be directed to the originating agency [here](#).
- The search results list sometimes displays "n/a" in the data fields, which stands for "not available". The data is sometimes not available depending on the document itself or how the document was processed.

Access by Law Enforcement

- ⦿ Internal agency audits/investigations
- ⦿ Employee discipline
- ⦿ Criminal prosecution

Enforcement and Prosecutions

- **Criminal enforcement:** An employee at the Bureau of Prisons failed to include on his financial disclosure report that he was being paid by business that was competing for a federal contract. The employee was sentenced to 3 years probation and a fine.
- **Civil enforcement:** An employee at the Department of Homeland Security failed to file a financial disclosure termination report upon leaving government service. She was repeatedly reminded about this requirement. She settled the case with the Government, agreeing to pay \$4,000 and file the report.

An Integrity-based System: the Bigger Picture

