

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



June 5, 2018

The Honorable Richard Shelby
Chairman
Committee on Appropriations
United States Senate
S-128, The Capitol
Washington, DC 20510

The Honorable Patrick Leahy
Ranking Member
Committee on Appropriations
United States Senate
437 Russell Senate Building
Washington, DC 20510

The Honorable James Lankford
Chairman
Subcommittee on Financial Services
and General Government
Committee on Appropriations
United States Senate
316 Hart Senate Office Building
Washington, DC 20510

The Honorable Christopher Coons
Ranking Member
Subcommittee on Financial Services
and General Government
Committee on Appropriations
United States Senate
127A Russell Senate Office Building
Washington, DC 20510

Dear Chairman Shelby, Ranking Member Leahy, Subcommittee Chairman Lankford, and Subcommittee Ranking Member Coons:

The U.S. Office of Government Ethics (OGE) writes to request authorization¹ to use \$72,500 of its fiscal year 2017 unobligated balance² for expenditures in fiscal year 2018, to enhance *Integrity*, OGE's secure web-based public financial disclosure filing system.

OGE provides overall leadership and oversight of the executive branch ethics program designed to prevent and resolve conflicts of interest. One of the most visible parts of OGE's mission is to oversee a public financial disclosure system that reaches more than 26,000 of the most senior leaders in the executive branch, including Presidentially-appointed, Senate-confirmed officials. Since January 2015, these senior leaders have successfully used *Integrity*, OGE's web-based financial disclosure application, to file all of their financial disclosure and transaction reports. This system, which was developed based on a congressional mandate contained in the Stop Trading on Congressional Knowledge Act of 2012,³ must be continuously maintained and improved in order to perform reliably, securely, and efficiently. Therefore, OGE requests approval to use \$72,500 of the available unobligated balance of fiscal year 2017 appropriations in fiscal year 2018 for unanticipated, one-time, mission-related expenses for newly recommended improvements to *Integrity* described more fully below.

¹ OGE requests this authorization pursuant to Pub. L. No. 115-31, § 609, 131 Stat. 371-372 (2017). OGE only has one budget account, so its request to use 50% of OGE's unobligated balance of fiscal year 2017 appropriations in fiscal year 2018 will not cross budget accounts.

² The unobligated balance of OGE's fiscal year 2017 Salaries and Expense appropriation, as of April 23, 2018, was \$146,253.00, half of which is \$73,126.50. OGE is requesting authorization to use \$72,500.00 of the available carryover balance for expenses related to *Integrity*.

³ See Pub. L. No. 112-105, § 11(b), 126 Stat. 299-300 (2012).



Specifically, OGE requests authorization to use \$72,500 of its available carryover balance to implement five priority improvements to *Integrity* requested by the new *Integrity* Interagency Advisory Council (IAC). Launched in January 2018, the IAC is composed of representatives of 16 agencies from across the executive branch with valuable experience with the system who recommend to OGE changes necessary to improve the system's functionality and efficiency based on filer, reviewer, and administrator feedback. Based on their expertise and experience with the system the IAC has prioritized, and OGE is seeking to fund, the five improvements to *Integrity* described in the table below.

<i>Integrity</i>		
Executive Branchwide Electronic Public Financial Disclosure Filing System		
IMPROVEMENT	DESCRIPTION	ESTIMATED COST (rounded)
Customization of audit trail display	Increases efficiency by enabling ethics official reviewers to more quickly identify the source of the last change on a filer's report.	\$23,000
Annotation of post-certified reports	Improves transparency by creating the ability for ethics official reviewers to annotate a filer's report with post-certification amendments.	\$4,500
Implementation of ability to filter by audit trail	Reduces inefficiencies by creating the ability for ethics official reviewers to more quickly identify changes on a filer's report.	\$23,000
Expand compare functionality	Enhances productivity by providing more flexibility in how reviewers can compare a filer's current report to prior versions.	\$11,000
Customization of display settings	Increases efficiency by providing ethics official reviewers with the ability to customize and save personalized display settings.	\$11,000
	Total	\$72,500

OGE appreciates your favorable consideration of this request for important improvements to *Integrity*. If you or your staff need additional information or have any questions about this request, please contact me at (202) 482-9314 or Diana Veilleux, Chief, Legal, External Affairs and Performance Branch at (202) 482-9203. An identical request is being sent to the House of Representatives Appropriations Committee and Subcommittee on Financial Services and General Government.

Sincerely,



Shelley K. Finlayson
Chief of Staff and Program Counsel