



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

January 4, 2001
DO-01-002

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Amy L. Comstock
Director

SUBJECT: Transition Report

As many of you know, the Presidential Transition Act of 2000 requires OGE to conduct a study and submit a report on improvements to the financial disclosure process for Presidential nominees to Senate confirmed positions. The report shall include recommendations, and may include legislative proposals, regarding (1) streamlining, standardizing, and coordinating the financial disclosure process and the requirements of financial disclosure reports; (2) avoiding duplication of effort and reducing the burden of filing with respect to financial disclosure of information to the White House, the Office of Government Ethics (OGE) and the Senate; and (3) any other relevant matter the OGE determines appropriate. The law specifically states, however, that our recommendations and proposals shall not (if implemented) have the effect of lessening substantive compliance with any conflict of interest requirement.

The Office has begun gathering information and recommendations from the Senate, the White House and from a number of private organizations which have been studying the transition process. We also published a notice in the Federal Register inviting comments. See 65 Fed. Reg. 83039 (December 29, 2000), a copy of which is attached and is also available under the "What's New In Ethics" section of OGE's Web site. We have asked that comments be submitted by January 29, 2001.

We strongly encourage you to take this opportunity to provide your recommendations to this Office. We welcome any

comments or thoughts that you believe are responsive to this request, but have indicated below areas that, at this time, we believe will be OGE's focus.

SF 278

1. Information requested. The purpose of public financial disclosure is two-fold. First, it provides information to the Government so that it can assist employees in recognizing and avoiding statutory and regulatory conflicts of interest and, if necessary, detect conflicts of interest. Second, it is intended to provide information sufficient to support a level of public confidence in the integrity of an individual's decision making.

What information that is presently requested on the SF 278 do you believe is unnecessary for both of those purposes? Is there information that you believe should be requested that is not currently requested? What modifications would you suggest to the actual disclosure requirements?

2. Procedures. Would you recommend any changes to procedures that surround the collection, review, and certification of the SF 278 for purposes of a nominee's confirmation?

3. Forms. Assume that the statutory requirements for public financial disclosure are changed and that a new form will have to be designed. What recommendations do you have for the format of such a form?

Other aspects of the nomination/confirmation process

1. From your experience in the nomination/confirmation process, are there any procedures that you believe would be helpful in streamlining that process? Do not limit yourself to procedures within your agency. Feel free to address any aspect of the nomination/confirmation process that you believe should be addressed in this study.

2. Is there any information you believe should be provided to nominees or potential nominees that you believe they need as they proceed through this process? Who should provide that information?

As with the comments solicited from the general public, we would appreciate receiving your comments and recommendations by January 29, 2001.

[Attachment](#)